



# Massachusetts Cannabis Control Commission

## Marijuana Product Manufacturer

### General Information:

License Number: MP282104  
Original Issued Date: 11/01/2022  
Issued Date: 11/01/2022  
Expiration Date: 11/01/2023

## ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: The Green Lady Dispensary, Inc.

Phone Number: 914-490-5426 Email Address: nicole@thegreenladydispensary.com

Business Address 1: 370 Wareham Street

Business Address 2:

Business City: Middleborough Business State: MA

Business Zip Code: 02346

Mailing Address 1: 11 Amelia Drive

Mailing Address 2:

Mailing City: Nantucket Mailing State: MA

Mailing Zip Code: 02554

## CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Minority-Owned Business

## PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

## RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

To your knowledge, is the existing RMD certificate of registration in good standing?:

If no, describe the circumstances below:

## PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 40.5

Percentage Of Control: 33.33

Role: Owner / Partner

Other Role: CEO, Head of Security, President, Director,  
Capital Contributor

First Name: Rupert

Last Name: Campbell

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 40.5

Percentage Of Control:

33.33

Role: Owner / Partner

Other Role:

First Name: Nicole

Last Name: Campbell

Suffix:

Gender: Female

User Defined Gender:

What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 10

Percentage Of Control:

33.3

Role: Owner / Partner

Other Role: Secretary, Director

First Name: Corbet

Last Name: Campbell

Suffix:

Gender: Female

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French), Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali)

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: The Green Lady Dispensary, Inc.

Entity DBA:

Email:

Phone: 914-490-5426

nicole@thegreenladydispensary.com

Address 1: 11 Amelia Drive

Address 2:

City: Nantucket

State: MA

Zip Code: 02554

Types of Capital: Monetary/Equity

Other Type of Capital:

Total Value of Capital Provided:

Percentage of Initial Capital:

\$250000

100

Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

**First Name:** Rupert **Last Name:** Campbell **Suffix:**  
**Marijuana Establishment Name:** The Green Lady Dispensary, Inc. **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Nantucket **Marijuana Establishment State:** MA

**Individual 2**

**First Name:** Rupert **Last Name:** Campbell **Suffix:**  
**Marijuana Establishment Name:** The Green Lady Dispensary, Inc. **Business Type:** Marijuana Retailer  
**Marijuana Establishment City:** Nantucket **Marijuana Establishment State:** MA

**Individual 3**

**First Name:** Nicole **Last Name:** Campbell **Suffix:**  
**Marijuana Establishment Name:** The Green Lady Dispensary, Inc. **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Nantucket **Marijuana Establishment State:** MA

**Individual 4**

**First Name:** Nicole **Last Name:** Campbell **Suffix:**  
**Marijuana Establishment Name:** The Green Lady Dispensary, Inc. **Business Type:** Marijuana Retailer  
**Marijuana Establishment City:** Nantucket **Marijuana Establishment State:** MA

**Individual 5**

**First Name:** Corbet **Last Name:** Campbell **Suffix:**  
**Marijuana Establishment Name:** The Green Lady Dispensary, Inc. **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Nantucket **Marijuana Establishment State:** MA

**Individual 6**

**First Name:** Corbet **Last Name:** Campbell **Suffix:**  
**Marijuana Establishment Name:** The Green Lady Dispensary, Inc. **Business Type:** Marijuana Retailer  
**Marijuana Establishment City:** Nantucket **Marijuana Establishment State:** MA

**Individual 7**

**First Name:** Rupert **Last Name:** Campbell **Suffix:**  
**Marijuana Establishment Name:** The Green Lady Dispensary II, Inc. **Business Type:** Marijuana Retailer  
**Marijuana Establishment City:** Newton **Marijuana Establishment State:** MA

**Individual 8**

**First Name:** Nicole **Last Name:** Campbell **Suffix:**  
**Marijuana Establishment Name:** The Green Lady Dispensary II, Inc. **Business Type:** Marijuana Retailer  
**Marijuana Establishment City:** Newton **Marijuana Establishment State:** MA

**Individual 9**

**First Name:** Corbet **Last Name:** Campbell **Suffix:**  
**Marijuana Establishment Name:** The Green Lady Dispensary II, Inc. **Business Type:** Marijuana Retailer  
**Marijuana Establishment City:** Newton **Marijuana Establishment State:** MA

**MARIJUANA ESTABLISHMENT PROPERTY DETAILS**

**Establishment Address 1:** 370 Wareham Street  
**Establishment Address 2:**  
**Establishment City:** Middleborough **Establishment Zip Code:** 02346

Approximate square footage of the Establishment: 6809

How many abutters does this property have?: 16

Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes

### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Certification of Host Community Agreement.pdf	pdf	619d629f7d382308064566d0	11/23/2021
Plan to Remain Compliant with Local Zoning	TGLD_Plan to Remain Compliant.pdf	pdf	61cb455c922a104454b6b947	12/28/2021
Community Outreach Meeting Documentation	TGLD_COM Documentation.pdf	pdf	61fc4ab9d3dbc608cffa6ce9	02/03/2022

Total amount of financial benefits accruing to the municipality as a result of the host community agreement. If the total amount is zero, please enter zero and provide documentation explaining this number.: \$

### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	TGLD_Positive Impact Plan.pdf	pdf	61e6e504dc96b108e5513e4f	01/18/2022
Other	Mass CultivatED Cohort 3 Engagement Letter.pdf	pdf	61e6e50925efbc089300b842	01/18/2022
Other	Urban League-Mass CultivatED Letter for CCC.pdf	pdf	61f860b025efbc08930100ad	01/31/2022

### ADDITIONAL INFORMATION NOTIFICATION

Notification:

### INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner Other Role: CEO, Head of Security, President, Director, Capital Contributor

First Name: Rupert Last Name: Campbell Suffix:

RMD Association: RMD Owner

Background Question: yes

Individual Background Information 2

Role: Owner / Partner Other Role: COO, CFO, Head of Cultivation, Treasurer, Director, Capital Contributor

First Name: Nicole Last Name: Campbell Suffix:

RMD Association: RMD Owner

Background Question: yes

Individual Background Information 3

Role: Owner / Partner Other Role: Secretary, Director

First Name: Corbet Last Name: Campbell Suffix:

RMD Association: RMD Owner

Background Question: yes

### ENTITY BACKGROUND CHECK INFORMATION

#### Entity Background Check Information 1

Role: Investor/Contributor

Other Role:

Entity Legal Name: The Green Lady Dispensary, Inc.

Entity DBA:

Entity Description: Marijuana Retailer

Phone: 914-490-5426

Email: nicole@thegreenladydispensary.com

Primary Business Address 1: 11 Amelia Drive

Primary Business Address 2:

Primary Business City: Nantucket

Primary Business State: MA

Principal Business Zip Code: 02554

Additional Information:

### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	Certificate of Good Standing DOR.pdf	pdf	61322f0dd64352077f3c1906	09/03/2021
Department of Revenue - Certificate of Good standing	Certificate of Good Standing UI.pdf	pdf	61322f180b068e073262b8cb	09/03/2021
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing SoC.pdf	pdf	6168371f1a09116935912048	10/14/2021
Articles of Organization	Articles of Organization.pdf	pdf	61957ac2d5b18b31d599a0c7	11/17/2021
Bylaws	TGLD - For Profit Bylaws.pdf	pdf	619653816155aa37c425a0f3	11/18/2021

No documents uploaded

Massachusetts Business Identification Number: 001331160

Doing-Business-As Name:

DBA Registration City:

### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	TGLD - Plan for Obtaining Liability Insurance.pdf	pdf	61302807b9f60d076b8d48af	09/01/2021
Business Plan	TGLD - Business Plan.pdf	pdf	6130f516ab6739076439d6ec	09/02/2021
Proposed Timeline	TGLD - Timeline_Product Manufacturing.pdf	pdf	6130f520d905310789ae26cc	09/02/2021

### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Method used to produce products	TGLD - Methods Used to Produce Products_PM.pdf	pdf	613027230b068e073262aee3	09/01/2021
Sample of unique identifying marks used for branding	TGLD - Samples of Unique Identifying Marks Used for Branding_PM.pdf	pdf	6130272ad64352077f3c0f45	09/01/2021
Separating recreational from	TGLD - Plan for Separating Recreational	pdf	61302758d905310789ae2396	09/01/2021

medical operations, if applicable	From Medical Operations.pdf				
Restricting Access to age 21 and older	TGLD - Plan for Restricting Access to Age 21 and Older_PM.pdf	pdf	6130275ad64352077f3c0f49	09/01/2021	
Security plan	TGLD - Security Plan.pdf	pdf	6130275d3e10be075d4ab9d6	09/01/2021	
Prevention of diversion	TGLD - Prevention of Diversion.pdf	pdf	6130275fb9f60d076b8d48a8	09/01/2021	
Storage of marijuana	TGLD - Storage of Marijuana.pdf	pdf	613027640b068e073262aee7	09/01/2021	
Transportation of marijuana	TGLD - Transportation of Marijuana.pdf	pdf	613027a3ac54100740714046	09/01/2021	
Inventory procedures	TGLD - Inventory Procedures.pdf	pdf	613027a4ab6739076439d39b	09/01/2021	
Quality control and testing	TGLD - Quality Control and Testing_PM.pdf	pdf	613027a50b068e073262aee7	09/01/2021	
Personnel policies including background checks	TGLD - Personnel Policies Including Background Checks.pdf	pdf	613027afa82c5807742a7365	09/01/2021	
Record Keeping procedures	TGLD - Recordkeeping Procedures_PM.pdf	pdf	613027b4d64352077f3c0f51	09/01/2021	
Maintaining of financial records	TGLD - Maintaining of Financial Records_PM.pdf	pdf	613027bbe140910769755a8f	09/01/2021	
Qualifications and training	TGLD - Qualifications and Training_PM.pdf	pdf	613027da25900e079f2b488f	09/01/2021	
Energy Compliance Plan	TGLD - Energy Compliance Plan_PM.pdf	pdf	613027e0ab6739076439d39f	09/01/2021	
Safety Plan for Manufacturing	TGLD - Product Manufacturing Safety Plan_PM.pdf	pdf	613027efd905310789ae239c	09/01/2021	
Plan to Obtain Marijuana	TGLD - Plan for Obtaining Marijuana_PM.pdf	pdf	613027fb8aea4607aa2acee5	09/01/2021	
Types of products Manufactured.	TGLD_Types of Products Manufactured.pdf	pdf	61a8fe5d6991cd3b88f9bd9f	12/02/2021	
Diversity plan	TGLD_Diversity Plan.pdf	pdf	61fd4305f2351e085f729153	02/04/2022	
Types of products Manufactured.	Types of Products Manufactured.pdf	pdf	620519b57c2bdd089a1f72dd	02/10/2022	

## ATTESTATIONS

I certify that no additional entities or individuals meeting the requirement set forth in 935 CMR 500.101(1)(b)(1) or 935 CMR 500.101(2)(c)(1) have been omitted by the applicant from any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.: I Agree

I understand that the regulations stated above require an applicant for licensure to list all executives, managers, persons or entities having direct or indirect authority over the management, policies, security operations or cultivation operations of the Marijuana Establishment; close associates and members of the applicant, if any; and a list of all persons or entities contributing 10% or more of the initial capital to operate the Marijuana Establishment including capital that is in the form of land or buildings.: I Agree

I certify that any entities who are required to be listed by the regulations above do not include any omitted individuals, who by themselves, would be required to be listed individually in any marijuana establishment application(s) for licensure submitted to the Cannabis Control Commission.: I Agree

### Notification:

I certify that any changes in ownership or control, location, or name will be made pursuant to a separate process, as required under 935 CMR 500.104(1), and none of those changes have occurred in this application.:

I certify that to the best knowledge of any of the individuals listed within this application, there are no background events that have arisen since the issuance of the establishment's final license that would raise suitability issues in accordance with 935 CMR 500.801.:

I certify that all information contained within this renewal application is complete and true.:

## ADDITIONAL INFORMATION NOTIFICATION

**Notification:**

**COMPLIANCE WITH POSITIVE IMPACT PLAN**

No records found

**COMPLIANCE WITH DIVERSITY PLAN**

No records found

**PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS**

No records found

**HOURS OF OPERATION**

**Monday From: 10:00 AM      Monday To: 6:00 PM**

**Tuesday From: 10:00 AM      Tuesday To: 6:00 PM**

**Wednesday From: 10:00 AM      Wednesday To: 6:00 PM**

**Thursday From: 10:00 AM      Thursday To: 6:00 PM**

**Friday From: 10:00 AM      Friday To: 6:00 PM**

**Saturday From: 10:00 AM      Saturday To: 6:00 PM**

**Sunday From: 10:00 AM      Sunday To: 6:00 PM**

# Host Community Agreement Certification Form

## Instructions

Certification of a host community agreement is a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). Applicants must complete items 1-3. The contracting authority for the municipality must complete items 4-8. Failure to complete a section will result in the application not being deemed complete. This form should be completed and uploaded into your application. Please note that submission of information that is “misleading, incorrect, false, or fraudulent” is grounds for denial of an application for a license pursuant to 935 CMR 500.400(2) and 501.400(2).

## Certification

The parties listed below do certify that the applicant and municipality have executed a host community agreement on the specified date below pursuant to G.L. c. 94G § 3(d):

1. Name of applicant:

The Green Lady Dispensary, Inc.

2. Name of applicant’s authorized representative:

Nicole Campbell

3. Signature of applicant’s authorized representative:

Nicole Campbell

Digitally signed by Nicole Campbell  
Date: 2021.11.08 16:06:15 -05'00'

4. Name of municipality:

Middleborough

5. Name of municipality’s contracting authority or authorized representative:

Robert G. Nunes





6. Signature of municipality's contracting authority or authorized representative:



7. Email address of contracting authority or authorized representative of the municipality (*this email address may be used to send municipal notices pursuant to 935 CMR 500.102(1) and 501.102(1).*):

rnunes@middleboroughma.gov

8. Host community agreement execution date:

10/20/21



### **PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING**

The Green Lady Dispensary, Inc. (“Green Lady”) will remain compliant at all times with the local zoning requirements set forth in the Town of Middleborough’s Zoning Bylaw. In accordance with Zoning Bylaw Section 8.5, Green Lady’ proposed Marijuana Cultivator and Product Manufacturer Establishment is located in the Cannabis Business District designated for Marijuana Cultivator and Product Manufacturer Establishments.

In compliance with 935 CMR 500.110(3), the property is not located within 500 feet of a pre-existing public or private school providing education in kindergarten or any of grades 1 through 12, daycare centers, libraries, playgrounds, parks, martial arts and dance studios, houses of worship, pediatric medical offices, toy stores or comic book stores.

As required by the Town of Middleborough’s Zoning Bylaw, Green Lady will apply for a Special Permit and/or Site Plan Approval, as applicable, from the local Special Permit Granting Authority. Green Lady will apply for any other local permits required to operate at the proposed location. Green Lady will comply with all conditions and standards set forth in any local permit required to operate at Green Lady’s proposed location. The permit, once awarded, must be acted on within two calendar years.



# Community Outreach Meeting Attestation Form

## Instructions

Community Outreach Meeting(s) are a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). 935 CMR 500.101(1), 500.101(2), 501.101(1), and 501.101(2). The applicant must complete each section of this form and attach all required documents as a single PDF document before uploading it into the application. If your application is for a license that will be located at more than one (1) location, and in different municipalities, applicants must complete two (2) attestation forms – one for each municipality. Failure to complete a section will result in the application not being deemed complete. Please note that submission of information that is “misleading, incorrect, false, or fraudulent” is grounds for denial of an application for a license pursuant to 935 CMR 500.400(2) and 501.400(2).

## Attestation

I, the below indicated authorized representative of that the applicant, attest that the applicant has complied with the Community Outreach Meeting requirements of 935 CMR 500.101 and/or 935 CMR 501.101 as outlined below:

1. The Community Outreach Meeting was held on the following date(s):
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).



4. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was published in a newspaper of general circulation in the municipality at least 14 calendar days prior to the meeting. A copy of this publication notice is labeled and attached as "Attachment A."

- a. Date of publication: 11/25/21
- b. Name of publication: Middleboro Gazette

5. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was filed with clerk of the municipality. A copy of this filed notice is labeled and attached as "Attachment B."

- a. Date notice filed: 11/18/21

6. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was mailed at least seven (7) calendar days prior to the community outreach meeting to abutters of the proposed address, and residents within 300 feet of the property line of the applicant's proposed location as they appear on the most recent applicable tax list, notwithstanding that the land of the abutter or resident is located in another municipality. A copy of this mailed notice is labeled and attached as "Attachment C." Please redact the name of any abutter or resident in this notice.

- a. Date notice(s) mailed: 11/23/2021

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:
  - a. The type(s) of ME or MTC to be located at the proposed address;
  - b. Information adequate to demonstrate that the location will be maintained securely;
  - c. Steps to be taken by the ME or MTC to prevent diversion to minors;
  - d. A plan by the ME or MTC to positively impact the community; and
  - e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.



Name of applicant:

The Green Lady Dispensary, Inc.

Name of applicant's authorized representative:

Nicole Campbell

Signature of applicant's authorized representative:

DocuSigned by:  
*Nicole Campbell*  
FF036B56F16B4D2...



Link to Presentation:

<https://us02web.zoom.us/rec/share/cEhDzyakpqub1LPURDt9ZCYPApjbZr1qZWETYjiRJCSLnBv2x1faQvTq1XNz9qIB.L7NBn5jgiz-2rjAQ>

Please copy and paste the above link. Clicking on it may not appropriately redirect you.

Passcode: TGLD2021!

Number of Attendees: 5

## Sarah Grande

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**From:** Allison Ferreira <aferreira@middleboroughma.gov>  
**Sent:** Thursday, February 3, 2022 11:27 AM  
**To:** Bridgette Nikisher  
**Cc:** Sarah Grande; Colleen Lieb  
**Subject:** RE: Virtual Community Outreach Meeting

Bridgette,

I spoke with our Executive Assistant to our Board of Selectmen and she indicated that virtual meetings are allowed.

Respectfully,  
Allison

*Allison J. Ferreira, CMMC*

*Town Clerk*

*Town of Middleborough*

*Annex Building*

*20 Centre Street, 1<sup>st</sup> Floor*

*Middleborough MA 02346*

*(508) 946-2415 office*

*(508) 946-2308 fax*

*aferreira@middleboroughma.gov*

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# Home Depot employees clean up at Veterans Memorial

Special to Middleboro Gazette  
USA TODAY NETWORK

Middleborough's Veterans Memorial Park received an upgrade last week through the donations of Home Depot and work done by a crew of volunteer employees from several local stores.

Improvements included removal and replacement of some old plants, upgrading the sides of the park structure with new white stone and some general cleaning.

The company volunteers were from

the Taunton, Somerset and Wareham stores, including Rachel Shepard, Dawn Crowell, Bob Liesieur, Jimmy Poole, Michael DaCosta, Heidi Antclit, Nicole Dias, Jenny Greer, Ronald French, Jane Ellis and Theresa Hudson. Leading the crew from Home Depot were Nicole Dias, James Poole and Scott Horton.

Jason Cox, Middleborough's Veterans Service Officer, was involved in organizing the upgrades. Middleborough's Public Works Department provided a dump truck and a driver.



Landscaping supplies donated by the Home Depot for some recent improvements and clean-up at the Middleborough Veterans Memorial Park.



Middleborough Veterans Memorial Park received an upgrade last week through the donations of Home Depot and the work by a company crew of volunteer employees. Improvements included removal and replacement of some old plants, upgrading the sides of the park with white stone and general cleaning. PHOTOS BY BOB LESSARD/SPECIAL TO THE GAZETTE

## PUBLIC NOTICE

### NOTICE OF HEARING

The Middleborough Zoning Board of Appeals will hold a public hearing on Thursday, December 9, 2021 at 7:30 P.M., in the Selectmen's Room, Middleborough Town Hall, 10 Nickerson Avenue, Middleborough, MA 02345 relative to his request to allow for the demolition of the existing 1,650 sq ft in ground swimming pool and construct a new 2,170 sq ft in ground swimming pool. The subject property is located at 438 Plymouth Street, Middleborough, MA 02345, lot #704, known as KOK Campground. Anyone desiring to be heard on this matter should appear at the time and place designated.

Chairman Darrin DeGrazia  
On behalf of the Middleborough Zoning Board of Appeals  
November 25 & December 2, 2021  
The Middleboro Gazette Newspaper  
Notice also on [www.masspublicnotices.org](http://www.masspublicnotices.org)

The Middleborough Conservation Commission will hold a hearing under M.G.L. Ch. 131, s. 40, the Wetlands Protection Act, for a Determination of Applicability for 51 Marshbrook Street, Map 22, Lot 845, Reopened by Susan and Larry Dura. Hearings will be held on December 2, 2021, at 6:30PM in the BOS Meeting Room, at the Town Hall, 10 Nickerson Avenue and via remote. Join Zoom meeting: <https://us02web.zoom.us/j/85346575136>

Diane Stewart, Chair  
Nancy Ockers, 1st Co-Vice Chair  
Melissa Guimont, 2nd Co-Vice Chair  
Adam Guaraldi  
Jacqueline Jones  
Edward Medeiros  
November 25, 2021  
The Middleboro Gazette Newspaper  
Notice also on [www.masspublicnotices.org](http://www.masspublicnotices.org)

The Middleborough Conservation Commission will hold a hearing under M.G.L. Ch. 131, s. 40, the Wetlands Protection Act, to review an Abandoned Notice of Resource Area Determination for 177 East Grove Street & 197 East Grove Street, Map 8 and 9 will be held on December 2, 2021, at 6:30PM in the BOS Meeting Room, at the Town Hall, 10 Nickerson Avenue and via remote. Join Zoom meeting: <https://us02web.zoom.us/j/85346575136>

Diane Stewart, Chair  
Nancy Ockers, 1st Co-Vice Chair  
Melissa Guimont, 2nd Co-Vice Chair  
Adam Guaraldi  
Jacqueline Jones  
Edward Medeiros  
November 25, 2021  
The Middleboro Gazette Newspaper  
Notice also on [www.masspublicnotices.org](http://www.masspublicnotices.org)

### NOTICE OF HEARING

The Middleborough Zoning Board of Appeals will hold a public hearing on Thursday, December 9, 2021 at 7:30 P.M., in the Selectmen's Room, Middleborough Town Hall, 10 Nickerson Avenue, Middleborough, MA 02345 relative to his request to be granted a special permit pursuant to Section 4.5.3 of the Zoning By-Law to allow for the construction of greater than 20,000 sq gross area of buildings in a General Use District which will contain a total area of 34,790 sq ft. The subject property is located at 607A Wareham Street, Middleborough, MA 02345, lot #3027. Anyone desiring to be heard on this matter should appear at the time and place designated.

Chairman Darrin DeGrazia  
On behalf of the Middleborough Zoning Board of Appeals  
November 25 & December 2, 2021  
The Middleboro Gazette Newspaper  
Notice also on [www.masspublicnotices.org](http://www.masspublicnotices.org)

The Lakeville Board of Selectmen, acting in accordance with Mass General Laws Chapter 40A, as amended, will conduct a public hearing on Monday, December 13, 2021 at 6:30 PM remotely upon the petition of Anthony Valentin for a Special Permit to operate a Tattoo Shop in an Industrial Zone located at 12 Harding Street, Sale IRZ, Lakeville, MA as zoned by the Lakeville Zoning By-Laws.

In accordance with provisions allowed by Chapter 20 of the Acts of 2021, the December 13, 2021 public meeting of the Lakeville Board of Selectmen will be held remotely. However, to view this meeting in progress, please go to: [www.facebook.com/lakeville](https://www.facebook.com/lakeville) (you do not need a Facebook account to view the meeting). This meeting will be recorded and available to be viewed at a later date at <http://www.lakeville.com>.

Evangelie Fabian, Chair  
Richard LaCamera  
Corinne Carbone  
BOARD OF SELECTMEN  
November 25 & December 2, 2021  
The Middleboro Gazette Newspaper  
Notice also on [www.masspublicnotices.org](http://www.masspublicnotices.org)

### NOTICE OF MORTGAGEE'S SALE OF REAL ESTATE

By virtue and in execution of the Power of Sale contained in a certain mortgage given by Lisa M. Simonds, Mark R. Simonds to Mortgage Electronic Registration Systems, Inc., as nominee for First American Mortgage Trust, dated December 9, 2011 and recorded in the Plymouth County Registry of Deeds in Book 40705, Page 111 of which mortgage the undersigned is the present holder, assignment from: Mortgage Electronic Registration Systems, Inc. as mortgagee, as nominee for First American Mortgage Trust, its successors and assignee to Freedom Mortgage Corporation, recorded on February 24, 2020, in Book No. 52292, at Page 48 for breach of the conditions of said mortgage and for the purpose of foreclosing, the same will be sold at Public Auction at 17 Long Pond Road, Lakeville, Plymouth County, Massachusetts, all and singular the premises described in said mortgage.

The land with the buildings thereon situated on the Northerly side of Long Pond Road, Lakeville, Plymouth County, Massachusetts, bounded and described as follows: Beginning at the Southeast corner of said lot on said road, and running thence WESTERLY in line with said pond thirteen (13) rods and fifteen (15) links to line of land of F.A. Harvey, now or formerly, thence NORTHERLY eighteen (18) rods to a pond, thence SOUTHERLY in line of said Harvey twenty-seven (27) rods to said road, thence EASTERLY by said road seventeen (17) rods to the point of beginning. Said premises are conveyed subject to and with the benefit of assessments, restrictions, reservations and rights of way of record so far as the same are now in force and applicable.

For mortgagee's title see deed recorded with Plymouth County Registry of Deeds in Book 40705, Page 108. The premises will be sold and conveyed under and to the benefit of all rights, rights of way, restrictions, assessments, covenants, liens or claims in the nature of liens, improvements, public assessments, any and all unpaid taxes, tax titles, tax liens, water and sewer liens and any other municipal assessments or liens or existing encumbrances of record which are in force and are applicable, having priority over said mortgage, whether or not reference to such restrictions, assessments, improvements, liens or encumbrances is made in this advertisement.

TERMS OF SALE: A deposit of Ten Thousand (\$10,000.00) dollars by certified or bank check will be required to be paid by the purchaser at the time and place of sale. The balance is to be paid by certified or bank check at Harmony Law Offices, P.C., 150 California St., Newburyport, MA 01950, Newburyport, MA 01950, Newburyport, MA 01950, Newton Highlands, Massachusetts 02461-0389, within thirty (30) days from the date of sale. Bids will be provided to purchaser for recording upon receipt in full of the purchase price. The description of the premises contained in said mortgage shall control in the event of an error in this publication. Other terms, if any, to be announced at the sale. FREEDOM MORTGAGE CORPORATION Present holder of said mortgage BY Its Attorney, HARMONY LAW OFFICES, P.C., 150 California St., Newburyport, MA 02461 (617)585-6200 2015600309

November 18, 25 & December 2, 2021  
The Middleboro Gazette Newspaper  
Notice also on [www.masspublicnotices.org](http://www.masspublicnotices.org)

### LEGAL ADVERTISEMENT

The Middleborough Conservation Commission will hold a hearing under M.G.L. c. 131, s. 40, the Wetlands Protection Act, for the construction of a new residential subdivision roadway and stormwater infrastructure within 100' of a herbicide vegetated wetland. Fuller Street, Map 16, Lots 4844. Hearing has been requested by Fuller Street Development, LLC. Hearing will be held December 2, 2021 at 7:15 PM in the BOS Meeting Room, at the Town Hall, 10 Nickerson Avenue and via remote. Join Zoom meeting: <https://us02web.zoom.us/j/85346575136>

Diane Stewart, Chair  
Nancy Ockers, 1st Co-Vice Chair  
Melissa Guimont, 2nd Co-Vice Chair  
Adam Guaraldi  
Jacqueline Jones  
Edward Medeiros  
November 25, 2021  
The Middleboro Gazette Newspaper  
Notice also on [www.masspublicnotices.org](http://www.masspublicnotices.org)

### NOTICE OF COMMUNITY OUTREACH MEETING

Notice is hereby given that The Green Lady Dispensary, Inc. will hold a Virtual Community Outreach Meeting on December 8, 2021 at 6:00 PM in the State House, 100 State Street, Boston, MA 02133. The purpose of the meeting is to discuss the proposed location and operation of a cannabis dispensary. A copy of the meeting presentation will be made available at least 24 hours prior to the meeting by emailing [mccol12@greenladydispensary.com](mailto:mccol12@greenladydispensary.com) or called during the meeting.

Interested members of the community will have the opportunity to ask questions and receive answers from company representatives about the proposed facility and operations. Questions can be submitted in advance by emailing [mccol12@greenladydispensary.com](mailto:mccol12@greenladydispensary.com) or asked during the meeting.

Join Zoom Meeting: <https://us02web.zoom.us/j/85346575136>  
Zoom Meeting Telephone Dial In: +1 301 715 8521  
Meeting ID: 852 8477 4842

### LEGAL ADVERTISEMENT

Virtual meeting information is at the end of this notice. This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Regarding Virtual Web-Based Community Outreach Meetings, and the applicable requirements set forth in M.G.L. Ch. 94C and 95C CMR 800.003-015. A copy of the meeting presentation will be made available at least 24 hours prior to the meeting by emailing [mccol12@greenladydispensary.com](mailto:mccol12@greenladydispensary.com).

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Zoom Meeting Telephone Dial In: +1 301 715 8521  
Meeting ID: 852 8477 4842

Have an opinion? Write a letter to the editor!

Have an opinion? Write a letter to the editor!

Send Legal Notices via email to [llegert@s-t.com](mailto:llegert@s-t.com)

LEGAL NOTICES: Call: 508-979-4351



## Attachment B

**From:** [Allison Ferreira](#)  
**To:** [Bridgette Nikisher](#)  
**Subject:** RE: Online Form Submittal: Contact Us Form - Clerk  
**Date:** Thursday, November 18, 2021 2:38:02 PM  
**Attachments:** [image001.png](#)  
[image004.png](#)  
[image005.png](#)

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Thank you.

*Allison J. Ferreira, CMMC  
Town Clerk  
Town of Middleborough  
Annex Building  
20 Centre Street, 1<sup>st</sup> Floor  
Middleborough MA 02346  
(508) 946-2415 office  
(508) 946-2308 fax  
aferreira@middleboroughma.gov*

---

**From:** Bridgette Nikisher <b.nikisher@vicentesederberg.com>  
**Sent:** Thursday, November 18, 2021 2:34 PM  
**To:** Allison Ferreira <aferreira@middleboroughma.gov>  
**Subject:** RE: Online Form Submittal: Contact Us Form - Clerk

[**NOTICE:** This message originated outside of the Town of Middleborough mail system --  
**PLEASE DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Hi,

Of course. Thank you so much!

Best,

**Bridgette Nikisher**  
*Strategic Affairs Specialist  
She/Her/Hers*

**Vicente Sederberg LLP**  
Direct: 917-398-0685  
Main: 917-338-5455  
[b.nikisher@vicentesederberg.com](mailto:b.nikisher@vicentesederberg.com)  
[VicenteSederberg.com](http://VicenteSederberg.com)  
[Confidentiality Notice](#)

## Attachment B



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**From:** Allison Ferreira <[afferreira@middleboroughma.gov](mailto:afferreira@middleboroughma.gov)>  
**Sent:** Thursday, November 18, 2021 2:19 PM  
**To:** Bridgette Nikisher <[b.nikisher@vicentesederberg.com](mailto:b.nikisher@vicentesederberg.com)>  
**Subject:** RE: Online Form Submittal: Contact Us Form - Clerk

Good afternoon,

Thank you for your below e-mail. Please be advised there was no attachment included. Could you kindly forward the attachment in response to this e-mail?

Respectfully,  
Allison

*Allison J. Ferreira, CMMC  
Town Clerk  
Town of Middleborough  
Annex Building  
20 Centre Street, 1<sup>st</sup> Floor  
Middleborough MA 02346  
(508) 946-2415 office  
(508) 946-2308 fax  
[afferreira@middleboroughma.gov](mailto:afferreira@middleboroughma.gov)*

---

**From:** [noreply@civicplus.com](mailto:noreply@civicplus.com) <[noreply@civicplus.com](mailto:noreply@civicplus.com)>  
**Sent:** Thursday, November 18, 2021 1:58 PM  
**To:** ClerkWeb <[ClerkWeb@middleboroughma.gov](mailto:ClerkWeb@middleboroughma.gov)>  
**Subject:** Online Form Submittal: Contact Us Form - Clerk

[NOTICE: This message originated outside of the Town of Middleborough mail system -- PLEASE DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Contact Us Form - Clerk

Email from Town of Middleborough Website

---

# Attachment B

Your Name	Bridgette Nikisher
Your e-mail address	<a href="mailto:b.nikisher@vicentesederberg.com">b.nikisher@vicentesederberg.com</a>
Your phone number	19144838836
Subject	Notice of Public Meeting
Message	Hello,

Please find the attached public meeting notices relative to a series of proposed Marijuana Cultivator and Product Manufacturers. If I can provide further information, please don't hesitate to ask.

Best,  
Bridgette Nikisher  
Strategic Affairs Specialist  
She/Her/Hers

Vicente Sederberg LLP  
1115 Broadway, 12thFloor  
New York, NY 10010  
Direct: 917-398-0685  
Main: 917-338-5455  
[b.nikisher@vicentesederberg.com](mailto:b.nikisher@vicentesederberg.com)

Email not displaying correctly? [View it in your browser.](#)

Please note: The Town of Middleborough will be transitioning to .gov over the next several months. All Town email addresses have changed from [@middleborough.com](mailto:@middleborough.com) to [@middleboroughma.gov](mailto:@middleboroughma.gov). All mail to the [middleborough.com](mailto:middleborough.com) addresses will still go through for the remainder of the calendar year. Please update your address books accordingly.

When responding, please be aware that the Massachusetts Secretary of State has determined that most email is public record and therefore cannot be kept confidential.

**CAUTION:** This email is from an EXTERNAL contact. Please do not open attachments, or click on links from unknown or suspicious senders.

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## NOTICE OF COMMUNITY OUTREACH MEETING

Notice is hereby given that The Green Lady Dispensary, Inc. will hold a Virtual Community Outreach Meeting on **December 8, 2021** at 6:00 PM to discuss the proposed siting of an Adult Use Marijuana Cultivation and Product Manufacturing Facility at 370 Wareham Street, Middleborough MA.

Virtual meeting information is at the end of this notice. This Virtual Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's Administrative Order Allowing Virtual Web-Based Community Outreach Meetings and the applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 *et seq.* A copy of the meeting presentation will be made available at least 24 hours prior to the meeting by emailing [nicole@thegreenladydispensary.com](mailto:nicole@thegreenladydispensary.com).

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--

Join Zoom Meeting: <https://us02web.zoom.us/j/86284074642>

Zoom Meeting Telephone Dial In: +1 301 715 8592; Meeting ID: 862 8407 4642#

# Attachment C

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--

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Zoom Meeting Telephone Dial In: +1 301 715 8592; Meeting ID: 862 8407 4642#

# Attachment C

DocuSign Envelope ID: 05738D28-D29F-429E-B89B-34F1CE3D2697





## PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

### Overview

The Green Lady Dispensary, Inc. (“TGLD”) is dedicated to serving and supporting the areas around it, particularly those that are classified as areas of disproportionate impact. Marijuana businesses have an obligation to the health and well-being of their customers as well as the communities that have had historically high rates of arrest, conviction, and incarceration related to marijuana crimes. It is TGLD's intention to be a contributing, positive force in areas of disproportionate impact and to assist in changing the perception of those associated with marijuana use.

### Goals

1. TGLD’s goal will be to maintain a staff comprised of 10% of individuals that have a drug-related CORI but are otherwise legally employable in a cannabis-related enterprise.<sup>1</sup>
2. TGLD will have a staff compromised of 10% of individuals from Wareham, Boston, or Commission-identified designated census tracts within the City of Boston.

### Programs

1. TGLD will work with Mass CultivatED to bring on two (2) fellows per year from areas of disproportionate impact or Massachusetts residents who have past drug convictions. TGLD will also make a \$10,000 donation to the program. TGLD is also providing employee housing, at no charge, to interns participating in this 8-10 week program. Fellows who complete the program with TGLD will be referred to open positions.
  - a. Mass CultivatED is a first in the nation jails to jobs cannabis program. Mass CultivatED fellows receive full-scholarship awards, gaining them access to individualized pro bono legal services, a higher education certificate program, workforce training, fully paid and benefited co-operative learning and externship rotations in the cannabis industry for educational credit hours, and job placement upon completion of the program.
2. TGLD will post annually in newspapers and online such as the Boston Herald, Wareham Week, and 70MillionJobs.com. The notices will state that the TGLD is specifically looking to hire Massachusetts residents who have past drug convictions and are 21 years or older, as well as residents from the target communities (Wareham, Boston, and specific census tracts in Boston).

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<sup>1</sup> TGLD will ensure that hiring efforts are completed in accordance with employment law standards, including “Ban The Box” requirements.

## Measurements

The CEO, in conjunction with other members of the executive management team, will administer the Plan to Positively Impact Areas of Disproportionate Impact (the “Plan”). The CEO will be responsible for recording measurable outcomes and will ensure that TGLD continues to meet TGLD’s commitments made in the Plan. TGLD will complete regular staffing audits to verify compliance with its staffing commitments pursuant to the Plan, and if found not in compliance, TGLD will immediately amend its hiring practices and strategies.

Measurements will include the following:

- Documentation of at least two (2) fellows per year from the CultivatED program;
- An accounting of donations made to the CultivatED program;
- An annual staffing analysis to determine the composition of TGLD’s workforce, including employees with past drug convictions and those who reside in areas of disproportionate impact; and
- Documentation of any job advertisements placed in relevant newspaper or online publications that are meant to target individuals with past drug convictions and those who reside in areas of disproportionate impact

The CFO/COO will administer TGLD’s relationship with Mass CultivatED to ensure that TGLD is providing financial support and taking on fellow from the program who are from areas of disproportionate impact or Massachusetts residents who have past drug convictions.

TGLD acknowledges that, upon receipt of a Provisional License, the progress and success of its plan will be documented upon renewal each year.

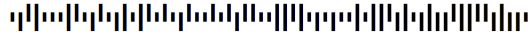
## Acknowledgements

- As identified above, TGLD intends to donate to CultivatED and acknowledges that CultivatED has been contacted and will receive the donation described herein.
- TGLD will adhere to the requirements set forth in 935 CMR 500.105(4) and 935 CMR 501.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment and Medical Marijuana Treatment Center.
- Any actions taken, or programs instituted, by TGLD will not violate the Commission’s regulations with respect to limitations on ownership or control or other applicable state laws.





## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



THE GREEN LADY DISPENSARY, INC.  
320 MT HOLLY RD  
KATONAH NY 10536-3546

### *Why did I receive this notice?*

The Commissioner of Revenue certifies that, as of the date of this certificate, THE GREEN LADY DISPENSARY, INC. is in compliance with its tax obligations under Chapter 62C of the Massachusetts General Laws.

This certificate doesn't certify that the taxpayer is compliant in taxes such as unemployment insurance administered by agencies other than the Department of Revenue, or taxes under any other provisions of law.

**This is not a waiver of lien issued under Chapter 62C, section 52 of the Massachusetts General Laws.**

### *What if I have questions?*

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 9:00 a.m. to 4:00 p.m..

### *Visit us online!*

Visit [mass.gov/dor](http://mass.gov/dor) to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

- Review or update your account
- Contact us using e-message
- Sign up for e-billing to save paper
- Make payments or set up autopay

Edward W. Coyle, Jr., Chief  
Collections Bureau



THE COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT  
DEPARTMENT OF UNEMPLOYMENT ASSISTANCE

Charles D. Baker  
GOVERNOR

Karyn E. Polito  
LT. GOVERNOR



367964346

Rosalin Acosta  
SECRETARY

Richard A. Jeffers  
DIRECTOR

The Green Lady Dispensary, Inc.  
11 AMELIA DR  
NANTUCKET, MA 02554-6063

EAN: 22125907  
August 31, 2021

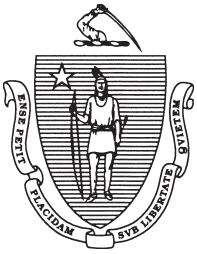
Certificate Id:51110

The Department of Unemployment Assistance certifies that as of 8/31/2021, The Green Lady Dispensary, Inc. is current in all its obligations relating to contributions, payments in lieu of contributions, and the employer medical assistance contribution established in G.L.c.149,§189.

This certificate expires in 30 days from the date of issuance.

Richard A. Jeffers, Director

Department of Unemployment Assistance



*The Commonwealth of Massachusetts*  
*Secretary of the Commonwealth*  
*State House, Boston, Massachusetts 02133*

William Francis Galvin  
Secretary of the  
Commonwealth

Date: October 13, 2021

To Whom It May Concern :

I hereby certify that according to the records of this office,

**THE GREEN LADY DISPENSARY, INC.**

is a domestic corporation organized on **June 06, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

*William Francis Galvin*

Secretary of the Commonwealth

Certificate Number: 21100267720

Verify this Certificate at: <http://corp.sec.state.ma.us/CorpWeb/Certificates/Verify.aspx>

Processed by: ili

D

The Commonwealth of Massachusetts

William Francis Galvin
Secretary of the Commonwealth
One Ashburton Place, Boston, Massachusetts 02108-1512

The Green Lady Dispensary, Inc. is a registrant with the Department of Public Health in accordance with 105 CMR 725.100(C) as of May 31, 2018.

B. Galvin

Bryan Harter
Director
Medical Use of Marijuana Program
Bureau of Healthcare Safety and Quality
Massachusetts Department of Public Health

FORM MUST BE TYPED

FORM

Articles of Entity Conversion of a Domestic Non-Profit with a Pending Provisional or Final Certification to Dispense Medical Use Marijuana to a Domestic Business Corporation (General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

- (1) Exact name of the non-profit: The Green Lady Dispensary, Inc. 001276965
(2) A corporate name that satisfies the requirements of G.L. Chapter 156D, Section 4.01: The Green Lady Dispensary, Inc.
(3) The plan of entity conversion was duly approved in accordance with the law.
(4) The following information is required to be included in the articles of organization pursuant to G.L. Chapter 156D, Section 2.02(a) or permitted to be included in the articles pursuant to G.L. Chapter 156D, Section 2.02(b):

ARTICLE I

The exact name of the corporation upon conversion is:

The Green Lady Dispensary, Inc.

ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. Chapter 156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose.\*

The corporation is organized to (a) cultivate, manufacture, market, promote, sell, distribute and otherwise provide products containing cannabis, products that enable persons to consume cannabis, and other related products, all for medicinal uses, but only in accordance with the laws of the Commonwealth of Massachusetts; (b) engage in all activities incidental thereto; and (c) engage in any other activities in which a corporation formed under the laws of the Commonwealth of Massachusetts may lawfully engage.

### ARTICLE III

State the total number of shares and par value, \* if any, of each class of stock that the corporation is authorized to issue. All corporations must authorize stock. If only one class or series is authorized, it is not necessary to specify any particular designation.

WITHOUT PAR VALUE		WITH PAR VALUE		
TYPE	NUMBER OF SHARES	TYPE	NUMBER OF SHARES	PAR VALUE
Common	100,000			

### ARTICLE IV

Prior to the issuance of shares of any class or series, the articles of organization must set forth the preferences, limitations and relative rights of that class or series. The articles may also limit the type or specify the minimum amount of consideration for which shares of any class or series may be issued. Please set forth the preferences, limitations and relative rights of each class or series and, if desired, the required type and minimum amount of consideration to be received.

Each owner of record of Common Stock shall be entitled to one vote for each share of Common Stock. Subject to applicable law, the owners of Common Stock shall be entitled to receive dividends out of funds legally available therefore at such times and in such amounts as the Board of Directors of the Corporation may determine, declare, order to be paid and pay in its discretion. Upon any liquidation, dissolution or winding up of the Corporation, whether voluntary or involuntary, after the payment or provisions for payment of all debts and liabilities of the Corporation, all remaining assets of the Corporation available for distribution to its shareholders shall be distributed pro rata to the holders of Common Stock, subject to applicable law.

### ARTICLE V

The restrictions, if any, imposed by the articles or organization upon the transfer of shares of any class or series of stock are:

### ARTICLE VI

Other lawful provisions, and if there are no such provisions, this article may be left blank.

See attached Article VI

*Note: The preceding six (6) articles are considered to be permanent and may be changed only by filing appropriate articles of amendment.*

**ARTICLE VII**

The effective date of organization of the corporation is the date and time the articles were received for filing if the articles are not rejected within the time prescribed by law. If a later effective date is desired, specify such date, which may not be later than the 90th day after the articles are received for filing:

**ARTICLE VIII**

The information contained in this article is not a permanent part of the articles of organization.

- a. The street address of the initial registered office of the corporation in the commonwealth:  
11 Amelia Drive, Nantucket, MA 02554
- b. The name of its initial registered agent at its registered office:  
Nicole Campbell
- c. The names and addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

President: Rupert Campbell

Treasurer: Nicole Campbell

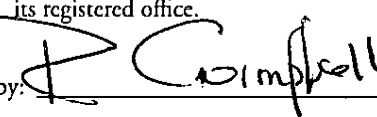
Secretary: Corbet Campbell

Director(s): Rupert Campbell, Nicole Campbell, and Corbet Campbell

- d. The fiscal year end of the corporation:  
December 31st
- e. A brief description of the type of business in which the corporation intends to engage:  
Cultivate, manufacture, market, sell and distribute cannabis and related products.
- f. The street address of the principal office of the corporation:  
11 Amelia Drive, Nantucket, MA 02554
- g. The street address where the records of the corporation required to be kept in the commonwealth are located is:

11 Amelia Drive, Nantucket, MA 02554, which is  
*(number, street, city or town, state, zip code)*

- its principal office;
- an office of its transfer agent;
- an office of its secretary/assistant secretary;
- its registered office.

Signed by:   
*(signature of authorized individual)*

- Chairman of the board of directors,
- President,
- Other officer,
- Court-appointed fiduciary,

on this 14<sup>th</sup> day of May, 2018

## ARTICLE VI CONTINUATION SHEET

- A. Limitation of Director Liability. Except as required by applicable law, no Director of the corporation shall have any personal liability to the corporation or its stockholders for monetary damages for breach of fiduciary duty as a director. The preceding sentence shall not eliminate or limit the liability of a director for any act or omission occurring prior to the date upon which such provision becomes effective.
- B. Indemnification. The Corporation shall, to the extent permitted by G.L c. 156D, indemnify all persons who have served or may serve at any time as officers or Directors of the Corporation and their heirs, executors, administrators, successors, and assigns, from and against any and all loss and expense, including amounts paid in settlement before or after suit is commenced, and reasonable attorney's fees, actually and necessarily incurred as a result of any claim, demand, action, proceeding, or judgment that may have been asserted against any such persons, or in which these persons are made parties by reason of their being or having been officers or Directors of the Corporation. This right of indemnification shall not exist in relation to matters as to which it is adjudged in any action, suit or proceeding that these persons are liable for negligence or misconduct in the performance of duty. The indemnification rights provided herein (i) shall not be deemed exclusive of any other rights to which those indemnified may be entitled under any law, agreement, vote of shareholders or otherwise; and (ii) shall inure to the benefit of the heirs, executors and administrators of such persons entitled to indemnification. The Corporation may, to the extent authorized from time to time by the board of Directors, grant indemnification rights to other employees or agents of the Corporation or other persons serving the Corporation and such rights may be equivalent to, or greater or less than, those set forth herein.
- C. Partnership. The corporation may be a partner to the maximum extent permitted by law.
- D. Minimum number of directors. The board of directors may consist of two or more individuals, notwithstanding the number of shareholders.
- E. Shareholder action without a meeting by less than unanimous consent. Action required or permitted by Chapter 156D of the General Laws of Massachusetts to be taken at a shareholders' meeting may be taken without a meeting by shareholders having not less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting.
- F. Authorization of directors to make, amend or repeal Bylaws. The board of directors may make, amend or repeal the Bylaws in whole or in part, except with respect to any provision thereof which by virtue of an express provision in Chapter 156D of the General Laws of Massachusetts, the Articles of Organization or the Bylaws requires action by the shareholders.

COMMONWEALTH OF MASSACHUSETTS

2522

William Francis Galvin  
Secretary of the Commonwealth  
One Ashburton Place, Boston, Massachusetts 02108-1512

**Articles of Entity Conversion of a  
Domestic Non-Profit with a Pending Provisional or  
Final Certification to Dispense Medical Use Marijuana  
to a Domestic Business Corporation**  
(General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

I hereby certify that upon examination of these articles of conversion, duly submitted to me, it appears that the provisions of the General Laws relative thereto have been complied with, and I hereby approve said articles; and the filing fee in the amount of \$475 having been paid, said articles are deemed to have been filed with me this 6 day of June, 2018, at \_\_\_\_\_ a.m./p.m.  
*time*

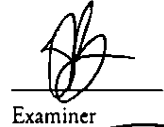
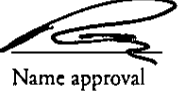
Effective date: \_\_\_\_\_  
*(must be within 90 days of date submitted)*



WILLIAM FRANCIS GALVIN  
*Secretary of the Commonwealth*

Filing fee: Minimum \$250

SECRETARY OF THE  
COMMONWEALTH  
2018 JUN -6 PM 3:26  
CORPORATIONS DIVISION

  
Examiner  
Name approval

\_\_\_\_\_

\_\_\_\_\_

TO BE FILLED IN BY CORPORATION  
Contact Information:

Nicole Campbell

11 Amelia Drive

Nantucket, MA 02554

Telephone: 914-490-5426

Email: ncampbell@growthproducts.com

Upon filing, a copy of this filing will be available at [www.sec.state.ma.us/cor](http://www.sec.state.ma.us/cor). If the document is rejected, a copy of the rejection sheet and rejected document will be available in the rejected queue.

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BYLAWS  
OF  
THE GREEN LADY DISPENSARY, INC.

## BYLAWS OF THE GREEN LADY DISPENSARY, INC.

### ARTICLE I OFFICES

**Section 1.01 Principal Office.** The principal office of the Corporation shall be located at such place within the Commonwealth of Massachusetts as shall be fixed from time to time by the board of Directors, and if no place is fixed by the board of Directors, such place as shall be fixed by the President.

### ARTICLE II SHAREHOLDERS

**Section 2.01 Place of Meeting.** Meetings of the shareholders shall be held at any place within or without the Commonwealth of Massachusetts that may be designated by the board of Directors. Absent such designation, meetings shall be held at the principal office. The board of Directors may, in its discretion, determine that the meeting may be held solely by means of remote electronic communication. If authorized by the board of Directors, and subject to any guidelines and procedures adopted by the board of Directors, shareholders not physically present at a meeting of shareholders, may participate in a meeting of shareholders by means of electronic transmission by and to the Corporation or electronic video screen communication; and, may be considered present in person and may vote at a meeting of shareholders, whether held at a designated place or held solely by means of electronic transmission by and to the Corporation or electronic video screen communication, subject to the conditions imposed by applicable law.

**Section 2.02 Annual Meeting.** The annual meeting of shareholders of this Corporation shall be held on such date and at such time as may be designated from time to time by the board of Directors. At the annual meeting, Directors shall be elected, and any other business may be transacted that is within the power of the shareholders and allowed by law.

**Section 2.03 Special Shareholders' Meetings.** Special meetings of the shareholders, for any purpose whatsoever, may be called at any time by the President, the board of Directors, or by shareholders entitled to cast not less than ten percent (10%) of the corporation's voting power. Any person entitled to call a special meeting of shareholders (other than the board of Directors) may make a written request to the board of Directors and the shareholders, specifying the general purpose of such meeting and the date, time and place of the meeting, which date shall be not less than thirty-five (35) days nor more than sixty (60) days after the receipt by such officer of the request.

**Section 2.04 Notice of Shareholders' Meeting.** Except as otherwise provided by law, written notice stating the place, day, and hour of the meeting shall be given at least two (2) days (or, if sent by mail, four (4) days) and not more than sixty (60) days before the meeting. In the case of an annual meeting, notice will include matters the Corporation's board of Directors intends, at the time of the giving of the first of such notices, to present to the shareholders for action. It shall not be necessary to state in a notice of any meeting of shareholders as a purpose thereof any matter relating to the procedural aspects of the conduct of such meeting. Notice shall be given

personally, by electronic transmission, or by mail, by or at the direction of the secretary, or the officer or person calling the meeting, to each shareholder entitled to vote at the meeting.

If mailed, the notice shall be deemed to be given when deposited in the United States mail addressed to the shareholder at the shareholder's address as it appears on the share transfer records of the Corporation, with postage thereon prepaid. Notice may be given to the shareholder by electronic transmission. Notice by electronic transmission is deemed given when sent, provided that the sender does not receive notification that the transmission failed.

The participation or attendance at a meeting of a person entitled to notice constitutes waiver of notice, except where the person objects, at the beginning of the meeting, to the lawfulness of the convening of the meeting.

**Section 2.05 Persons Entitled to Vote.** Except as otherwise provided by law, and except when a record date has been fixed, only persons in whose names shares entitled to vote stand on the stock records of the Corporation at the close of business on the business day next preceding the day on which notice is given shall be entitled to notice of a shareholders' meeting, or to vote at such meeting. In the event notice is waived, only persons in whose names shares entitled to vote stand on the stock records of the Corporation at the close of business on the business day next preceding the day on which the meeting is held shall be entitled to vote. If no record date has been fixed, the record date shall be:

(a) For determining shareholders entitled to give consent to action by the Corporation without a meeting, the day on which the first written consent is given.

(b) For determining shareholders for any other purpose, the later of (i) the day on which the board of Directors adopts the resolution relating thereto, or (ii) the sixtieth (60<sup>th</sup>) day prior to the date of such other action.

**Section 2.06 Fixing the Record Date.** The board of Directors may fix a time in the future as a record date to determine the shareholders entitled to notice of, and to vote at, any meeting of shareholders or give written consent to action by the Corporation without a meeting or entitled to receive any dividend or distribution, or to any change, conversion, or exchange of shares.

A record date fixed under this Section may not be more than sixty (60) days or less than ten (10) days before the meeting or more than sixty (60) days before any other action requiring a determination of shareholders. When a record date is so fixed, only shareholders of record at the close of business on that date are entitled to notice of and to vote at the meeting or to receive the dividend, distribution, or allotment of rights, or to exercise the rights, as the case may be, notwithstanding any transfer of any shares on the books of the Corporation after the record date. In the event any meeting of shareholders is adjourned for more than forty-five (45) days from the date set for the original meeting, the board shall fix a new record date for purposes of giving notice of, and determining the holders of shares entitled to vote at, such adjourned meeting.

**Section 2.07 Quorum of and Action by Shareholders.** The presence at a meeting in person or by proxy of the persons entitled to vote a majority of the voting shares constitutes a quorum for the transaction of business. The shareholders present at a duly called or held meeting

at which a quorum is present may continue to do business until adjournment notwithstanding the withdrawal of such number of shareholders so as to leave less than a quorum, if any action taken, other than adjournment, is approved by at least a majority of the shares required to constitute a quorum, except as otherwise provided by law. Except as otherwise provided by law, herein or in the Articles of Organization, the affirmative vote of a majority of the shares represented at a meeting at which a quorum is present, shall be the act of the shareholders.

**Section 2.08 Adjourned Meetings and Notice Thereof.** Any shareholders' meeting, annual or special, whether or not a quorum is present, may be adjourned from time to time by a vote of the majority of the shares present, in person or proxy. When a meeting is adjourned for forty-five (45) days or more, or if a new record date for the adjourned meeting is fixed by the board of Directors, notice of the adjourned meeting shall be given to such shareholders of record entitled to vote at the adjourned meeting, as in the case of any original meeting. When a meeting is adjourned for less than forty-five (45) days, and a new record date is not fixed by the board of Directors, it shall not be necessary to give any notice of the time and place of the adjourned meeting or of the business to be transacted thereat other than by announcement at the meeting at which the adjournment is taken.

**Section 2.09 Conduct of Meetings.** The board of Directors may adopt by resolution rules and regulations for the conduct of meetings of the shareholders as it shall deem appropriate. At every meeting of the shareholders, the President, or in his or her absence or inability to act, a Director or officer designated by the board of Directors shall serve as the presiding officer. The secretary or, in his or her absence or inability to act, the person whom the presiding officer of the meeting shall appoint secretary of the meeting, shall act as secretary of the meeting and keep the minutes thereof.

The presiding officer shall determine the order of business and, in the absence of a rule adopted by the board of Directors, shall establish rules for the conduct of the meeting. The presiding officer shall announce the close of the polls for each matter voted upon at the meeting, after which no ballots, proxies, votes, changes, or revocations will be accepted. Polls for all matters before the meeting will be deemed to be closed upon final adjournment of the meeting.

**Section 2.10 Voting of Shares.** Unless otherwise provided by law or in the Articles of Organization, each shareholder entitled to vote is entitled to one (1) vote for each share of Common Stock. Any holder of shares entitled to vote on any matter may vote part of such shares in favor of the proposal and refrain from voting the remaining shares or vote them against the proposal. If a shareholder fails to specify the number of shares such shareholder is voting affirmatively, it will be conclusively presumed that the shareholder's approving vote is with respect to all shares such shareholder is entitled to vote.

**Section 2.11 Consent of Absentees.** The transactions of any meeting of shareholders, however called or noticed, are as valid as though had at a meeting duly held after regular call and notice, if a quorum is present either in person or by proxy, and if, either before or after the meeting, each of the persons entitled to vote, not present in person or by proxy, signs a written waiver of notice, or a consent to the holding of such meeting, or an approval of the minutes thereof. The waiver, notice, or consent need not specify the business transacted or purpose of the meeting,

except as required by G.L. c. 156D. All such waivers, consents, or approvals shall be filed with the corporate records or made a part of the minutes of the meeting.

**Section 2.12 Voting by Proxy or Nominee.** Every person entitled to vote or execute consents may do so either in person or by one or more agents authorized by a written proxy executed by the person or such person's duly authorized agent and filed with the secretary of the Corporation. A proxy is not valid after the expiration of eleven (11) months from the date of its execution, unless the person executing it specifies therein the length of time for which it is to continue in force. Except as set forth below, any proxy duly executed is not revoked, and continues in full force and effect, until an instrument revoking it, or a duly executed proxy bearing a later date, executed by the person executing the prior proxy and presented to the meeting is filed with the secretary of the Corporation, or unless the person giving the proxy attends the meeting and votes in person, or unless written notice of the death or incapacity of the person executing the proxy is received by the Corporation before the vote by such proxy is counted. A proxy that states on its face that it is irrevocable will be irrevocable for the period of time specified in the proxy, if held by a person (or nominee of a person) specified by law to have sufficient interest to make such proxy irrevocable and only so long as he shall have such interest, subject to G.L. c. 156D, § 7.22.

**Section 2.13 Action by Shareholders Without a Meeting.** Any action, that, under any provision of G.L. c. 156D may be taken at a meeting of the shareholders, may be taken without a meeting and without prior notice if a consent in writing, setting forth the action so taken, shall be signed by the holders of the outstanding shares having not less than the minimum number of votes that would be necessary to authorize or take such action at a meeting at which all shares are entitled to vote thereon were present and voted; provided, however, that unless the consents of all shareholders entitled to vote have been solicited in writing, notice shall be given (in the same manner as notice of meetings is to be given), and within the time limits prescribed by law, of such action to all shareholders entitled to vote who did not consent in writing to such action; and provided, further, that Directors may be elected by written consent only if such consent is unanimously given by all shareholders entitled to vote, except that action taken by shareholders to fill one or more vacancies on the board other than a vacancy created by the removal of a Director, may be taken by written consent of a majority of the outstanding shares entitled to vote.

### **ARTICLE III DIRECTORS**

**Section 3.01 Number of Directors; Identity of Initial Directors.** The authorized number of Directors of the Corporation shall be three (3) until changed by an amendment to these Bylaws duly adopted in accordance with these Bylaws by the vote or written consent of a majority of the outstanding shares entitled to vote. The initial Directors shall be Nicole Campbell, Rupert Campbell, and Corbet Campbell.

**Section 3.02 Powers.** All corporate power shall be exercised by or under the authority of, and the business and affairs of the Corporation shall be managed under the direction of, the board of Directors, except such powers expressly conferred upon or reserved to the shareholders, and subject to any limitations set forth by law, by the Articles of Organization or by these Bylaws.

Without limiting the generality of the foregoing, and subject to the same limitations, it is hereby expressly declared that the Directors shall have the power and, to the extent required by law the duty to:

(a) Appoint and remove at pleasure of the board, all officers, managers, management companies, agents, and employees of the Corporation, prescribe their duties in addition to those prescribed in these Bylaws, supervise them, fix their compensation, and require from them security for faithful service. Such compensation may be increased or diminished at the pleasure of the Directors;

(b) Conduct, manage, and control the affairs and business of the Corporation; make rules and regulations not inconsistent with the Articles of Organization or applicable law or these Bylaws; make all lawful orders on behalf of the Corporation; and prescribe in the manner of executing the same;

(c) Incur indebtedness and borrow money on behalf of the Corporation and designate from time to time the person or persons who may sign or endorse checks, drafts, or other orders of payment of money, notes, or other evidences of indebtedness, issued in the name of, or payable to, the Corporation, and prescribe the manner of collecting or depositing funds of the Corporation, and the manner of drawing checks thereon;

(d) Appoint by resolution of a majority of the authorized number of Directors an executive committee and other committees and delegate to the executive committee any of the powers and authorities of the board in the management of the business and affairs of the Corporation, except the powers to (i) fill vacancies on the board or any committee, (ii) fix compensation of Directors; (iii) adopt, amend, or repeal these Bylaws; (iv) amend or repeal resolutions of the board that are expressly nonamendable or repealable; (v) declare a dividend or distribution to shareholders or authorize the repurchase of the Corporation's shares except at a rate, in a periodic amount or within a range, determined by the board; (vi) establish other committees of the board; or (vii) approve any action that in addition to board approval requires shareholder approval. The executive committee shall be composed of two (2) or more Directors. The provisions of these Bylaws regarding notice and meetings of Directors shall apply to all committees;

(e) Authorize the issuance of stock of the Corporation from time to time, upon such terms as may be lawful; and

(f) Prepare an annual report to be sent to the shareholders after the close of the fiscal or calendar year of this Corporation, which report shall comply with the requirements of law. To the extent permitted by law, the requirements that an annual report be sent to shareholders and the time limits for sending such reports are hereby waived, the Directors, nevertheless, having the authority to cause such report to be sent to shareholders.

**Section 3.03 Term of Office.** Directors shall hold office until the next annual meeting of shareholders and until their successors are elected.

**Section 3.04 Vacancies and Newly Created Directorships.** A vacancy on the board of Directors exists in case of the occurrence of any of the following events:

- (a) The death, resignation, or removal of any Director.
- (b) The removal or declaration of vacancy by the board of Directors of a Director who has been declared of unsound mind by a court order or convicted of a felony.
- (c) The Director is a shareholder who is divested from ownership of the marijuana business by a decision of either the state or local licensing authority.
- (d) The authorized number of Directors is increased.
- (e) At any annual, regular, or special meeting of shareholders at which any Director is elected, the shareholders fail to elect the full authorized number of Directors to be voted for at that meeting.

All vacancies (other than vacancies created by removal of a Director) may be filled by the approval of the board of Directors or, if there is less than a quorum of Directors, by (i) a vote of the majority of the remaining Directors at a meeting held pursuant to notice or waivers of notice complying with G.L. c. 156D, (ii) unanimous written consent or (iii) a sole remaining Director. Each Director so elected shall hold office until his successor is elected at an annual, regular, or special meeting of the shareholders. The shareholders may, by vote or written consent of a majority of outstanding shares entitled to vote in the election of Directors, elect a Director at any time to fill any vacancy not filled by the Directors. The shareholders may, by vote of a majority of outstanding shares entitled to vote in the election of Directors or unanimous written consent, elect a Director at any time to fill any vacancy created by removal of a Director, except that a vacancy created pursuant to clause (b) of this Section may be filled by the board of Directors. If the board of Directors accepts the resignation of a Director tendered to take effect at a future time, the board or the shareholders may elect a successor to take office when the resignation becomes effective. A reduction of the authorized number of Directors does not remove any Director prior to the expiration of that Director's term of office.

**Section 3.05 Removal.** The board of Directors may declare vacant the office of a Director who has been declared of unsound mind by an order of the court or convicted of a felony, or who has been barred from ownership of a marijuana business by a final decision of an applicable state or local licensing authority, or otherwise in a manner provided by law.

Any or all of the Directors may be removed from office at any duly called meeting without cause by a vote of the shareholders entitled to elect them. If one or more Directors are so removed at a meeting of shareholders, the shareholders may elect new Directors at the same meeting.

**Section 3.06 Resignation.** A Director may resign effective on giving written notice to the President, unless the notice specifies a later effective date.

**Section 3.07 Meetings of Directors.**

(a) Regular Meetings. A regular annual meeting of the board shall be held immediately after, and at the same place as, the annual meeting of shareholders for the purpose of electing officers and transacting any other business. The board may provide for other regular meetings from time to time by resolution.

(b) Special Meetings. Special meetings of the board for any purpose or purposes may be called at any time by at least one Director. Notice of the time and place of special meetings shall be delivered by mail, electronic delivery, or orally. If notice is mailed, it shall be deposited in the United States mail at least three (3) days before the time of the meeting. In the case the notice is delivered either orally or by electronic delivery shall be delivered at least forty-eight (48) hours before the time of the meeting. Any oral notice given personally or by telephone may be communicated either to the Director or to a person at the office of the Director whom the person giving notice has reason to believe will promptly communicate it to the Director. The notice need not specify the purpose of the meeting nor the place if it is to be held at the principal office of the Corporation.

(c) Place of Meetings. Meetings of the Board may be held at any place within or without the Commonwealth of Massachusetts that has been designated in the notice. If a place has not been stated in the notice or there is no notice, meetings shall be held at the principal office of the Corporation unless another place has been designated by a resolution duly adopted by the board.

**Section 3.08 Electronic Participation.** Members of the board may participate in a meeting through conference telephone, electronic video screen communication, or other electronic transmission by and to the Corporation. Participation in a meeting by conference telephone or electronic video screen communication constitutes presence in person as long as all Directors participating can hear one another. Participation by other electronic transmission by and to the Corporation (other than conference telephone or electronic video screen communication) constitutes presence in person at the meeting as long as participating Directors can communicate with other participants concurrently, each Director has the means to participate in all matters before the board, including the ability to propose or object to a specific corporate action, and the Corporation implements some means of verifying that each person participating is entitled to participate and all votes or other actions are taken by persons entitled to participate.

**Section 3.09 Quorum of and Action by Directors.** A majority of the authorized number of Directors constitutes a quorum of the board for the transaction of business. Every act or decision done or made by a majority of the Directors present at a meeting duly held at which a quorum is present is the act of the board of Directors, unless G.L. c. 156D or the Articles of Organization require a greater number. A meeting at which a quorum is initially present may continue to transact business notwithstanding the withdrawal of Directors, if any action is approved by at least a majority of the Directors who constitute the required quorum for such meeting. A quorum of the Directors may adjourn any Directors' meeting to meet again at a stated time and place. In the absence of quorum, a majority of the Directors present may adjourn from time to time. Notice of the time and place of a meeting that has been adjourned for more than twenty-four (24) hours shall be given to the Directors not present at the time of the adjournment.

**Section 3.10 Compensation.** Directors shall not receive compensation in connection with his or her service as a Director, provided, however, that Directors shall not be prohibited from holding any other position with the Corporation or providing any other services to the Corporation and receiving compensation from the Corporation in connection with such employment or services. Directors may receive reimbursement for reasonable costs incurred in connection with his or her service as a Director.



**Section 3.11 Action by Directors Without a Meeting.** Any action required or permitted to be taken by the board of Directors or any committee thereof under G.L. c. 156D may be taken without a meeting if, prior or subsequent to the action, a consent or consents thereto by all of the Directors in office, or all the committee members then appointed, is filed with the secretary to be filed with the minutes of the proceedings of the board of Directors. Such action by written consent shall have the same force and effect as a unanimous vote of such Directors.

**Section 3.12 Committees of the Board of Directors.** The board of Directors, by resolution adopted by a majority of authorized Directors, may designate one or more committees, each consisting of two or more Directors, to serve at the pleasure of the board and to exercise the authority of the board of Directors to the extent provided in the resolution establishing the committee and permitted by law. The board of Directors may adopt governance rules for any committee consistent with these Bylaws. The provisions of these Bylaws applicable to meetings and actions of the board of Directors shall govern meetings and actions of each committee, with the necessary changes made to substitute the committee and its members for the board of Directors and its members.

A committee of the board of Directors does not have the authority to:

- (a) Approve actions that require approval of the shareholders or the outstanding shares.
- (b) Fill vacancies on the board or in any committee.
- (c) Fix compensation of the Directors for serving on the board or on any committee.
- (d) Amend or repeal bylaws or adopt new bylaws.
- (e) Amend or repeal any resolution of the board of Directors that by its terms is not so amendable or repealable.
- (f) Make a distribution to shareholders, except at a rate, in a periodic amount or within a price range set forth in the Articles of Organization or determined by the board.
- (g) Appoint other committees or board members.

The board of Directors, by resolution adopted by the majority of authorized Directors, may designate one or more Directors as alternate members of any committee who may replace any absent or disqualified member at any meeting of the committee or for the purposes of any written action by the committee.

The designation of a committee of the board of Directors and the delegation thereto of authority shall not operate to relieve the board of Directors, or any member thereof, of any responsibility imposed by law.

## **ARTICLE IV OFFICERS**

**Section 4.01 Positions and Election.** The officers of the Corporation shall be elected by the board of Directors and shall be a chair of the board or a President or both, a secretary and a treasurer. At the discretion of the board of Directors, the Corporation may also have other officers, including but not limited to one or more vice Presidents or assistant vice Presidents, one or more assistant secretaries, a chief financial officer, and a chief operations officer, as may be appointed by the board of Directors, with such authority as may be specifically delegated to such officers by the board of Directors. Any two or more offices may be held by the same person.

Officers shall be elected annually at the meeting of the board of Directors held after each annual meeting of shareholders. Each officer shall serve until a successor is elected and qualified or until the earlier death, resignation or removal of that officer. Vacancies or new offices shall be filled at the next regular or special meeting of the board of Directors.

**Section 4.02 Removal and Resignation.** Any officer elected or appointed by the board of Directors may be removed with or without cause by the affirmative vote of the majority of the board of Directors. Removal shall be without prejudice to the contract rights, if any, of the officer so removed.

Any officer chosen by the board of Directors may resign at any time by giving written notice to the Corporation. Unless a different time is specified in the notice, the resignation shall be effective upon its receipt by the chair, the President, the secretary, or the board.

**Section 4.03 Powers and Duties of Officers.** The powers and duties of the officers of the Corporation shall be as provided from time to time by resolution of the board of Directors or by direction of an officer authorized by the board of Directors to prescribe the duties of other officers. In the absence of such resolution, the respective officers shall have the powers and shall discharge the duties customarily and usually held and performed by like officers of corporations similar in organization and business purposes to the Corporation subject to the control of the board of Directors.

## **ARTICLE V INDEMNIFICATION OF DIRECTORS AND OFFICERS**

**Section 5.01 Indemnification of Officers or Directors.** The Corporation shall, to the extent permitted by G.L c. 156D, indemnify all persons who have served or may serve at any time as officers or Directors of the Corporation and their heirs, executors, administrators, successors, and assigns, from and against any and all loss and expense, including amounts paid in settlement before or after suit is commenced, and reasonable attorney's fees, actually and necessarily incurred as a result of any claim, demand, action, proceeding, or judgment that may have been asserted against any such persons, or in which these persons are made parties by reason of their being or having been officers or Directors of the Corporation. This right of indemnification shall not exist in relation to matters as to which it is adjudged in any action, suit or proceeding that these persons are liable for negligence or misconduct in the performance of duty.

**Section 5.02 Non-Exclusivity of Indemnification Rights and Authority to Insure.**

The foregoing rights of indemnification and advancement of expenses shall be in addition to and not exclusive of any other rights to which any person may be entitled pursuant to any agreement with the Corporation, or under any statute, provision of the Articles of Organization or any action taken by the Directors or shareholders of the Corporation.

The Corporation may buy and maintain insurance to protect itself and any agent against any expense asserted against them or incurred by an agent, whether or not the Corporation could indemnify the agent against the expense under applicable law or the provisions of this Article V.

**ARTICLE VI  
SHARE CERTIFICATES AND TRANSFER**

**Section 6.01 Share Certificates.** Shares of the Corporation may, but need not, be represented by certificates. Each certificate issued shall bear all statements or legends required by law to be affixed thereto. For all shares issued or transferred without certificates, the Corporation shall within a reasonable time after such issuance or transfer send the shareholder a written statement of the information required on share certificates pursuant to G.L. c. 156D, § 6.25(b) & (c) and § 6.27. Shareholders can request and obtain a statement of rights, restrictions, preferences, and privileges regarding classified shares or a class of shares with two or more series, if any, from the Corporation's principal office. Each certificate issued shall bear all statements or legends required by law to be affixed thereto.

Every certificate for shares shall be signed by (i) the chair of the board, if any, a vice chair, if any, the President, or a vice President and (ii) the chief financial officer, an assistant treasurer, the secretary, or any assistant secretary.

**Section 6.02 Transfers of Shares.** Transfer of shares of the Corporation shall be made only on the books of the Corporation by the registered holder thereof or by such other person as may under law be authorized to endorse such shares for transfer, or by such shareholder's attorney thereunto authorized by power of attorney duly executed and filed with the secretary or transfer agent of the Corporation. Except as otherwise provided by law, upon surrender to the Corporation or its transfer agent of a certificate for shares duly endorsed or accompanied by proper evidence of succession, assignment, or authority to transfer, it shall be the duty of the Corporation to issue a new certificate to the person entitled thereto, cancel the old certificate, and record the transaction upon its books. Shareholders shall not transfer or attempt to transfer any shares to any person or entity that is prohibited from holding such interest in the Corporation or to a person or entity whose ownership of such shares would jeopardize any license held by the Corporation. Any purported transfer that would violate the preceding sentence shall be null and void.

**Section 6.03 Registered Shareholders.** The Corporation may treat the holder of record of any shares issued by the Corporation as the holder in fact thereof, for purposes of voting those shares, receiving distributions thereon or notices in respect thereof, transferring those shares, exercising rights of dissent with respect to those shares, exercising or waiving any preemptive right with respect to those shares, entering into agreements with respect to those shares in accordance with the laws of the Commonwealth of Massachusetts, or giving proxies with respect to those shares.

**Section 6.04 Lost, Stolen, or Destroyed Certificates.** The board of Directors may issue a new share certificate in place of any certificate it previously issued that the shareholder alleges to have been lost, stolen, or destroyed provided that the shareholder or the shareholder's legal representative of the lost, stolen, or destroyed certificate shall give the Corporation a bond or other adequate security sufficient to indemnify the Corporation against any potential claim against the Corporation because of the alleged loss, theft, or destruction of any such certificate or the issuance of such new certificate.

## **ARTICLE VII CORPORATE RECORDS AND INSPECTION**

**Section 7.01 Records.** The Corporation shall maintain adequate and correct books and records of account, minutes of the proceedings of the shareholders, board of Directors, and committees of the board of Directors, and a record of its shareholders, including names and addresses of all shareholders and the number and class of shares held, along with any other records required by law. The Corporation shall keep such record of its shareholders at its principal office, as fixed by the board of Directors from time to time, or at the office of its transfer agent or registrar. The Corporation shall keep its books and records of account and minutes of the proceedings of the shareholders, board of Directors, and committees of the board of Directors at its principal office, or such other location as shall be designated by the board of Directors from time to time.

**Section 7.02 Inspection of Books and Records.** The Corporation's accounting books and records and minutes of proceedings of the shareholders, board of Directors, and committees of the board of Directors shall, to the extent provided by law, be open to inspection of Directors, shareholders, and voting trust certificate holders, in the manner provided by law.

**Section 7.03 Certification and Inspection of Bylaws.** The Corporation shall keep in its principal office the original or a copy of these Bylaws as amended or otherwise altered to date, which shall be open to inspection by the shareholders at all reasonable times during office hours.

## **ARTICLE VIII MISCELLANEOUS**

**Section 8.01 Checks, Drafts, Etc.** All checks, drafts or other instruments for payment of money or notes of the Corporation shall be signed by an officer or officers or any other person or persons as shall be determined from time to time by resolution of the board of Directors.

**Section 8.02 Fiscal Year.** The fiscal year of the Corporation shall commence on January 1 of each year.

**Section 8.03 Conflict with Applicable Law or Articles of Organization.** Unless the context requires otherwise, the general provisions, rules of construction, and the definitions of G.L. c. 156D shall govern the construction of these Bylaws. These Bylaws are adopted subject to any applicable law and the Articles of Organization. Whenever these Bylaws may conflict with any applicable law or the Articles of Organization, such conflict shall be resolved in favor of such law or the Articles of Organization.

**Section 8.04 Invalid Provisions.** If any one or more of the provisions of these Bylaws, or the applicability of any provision to a specific situation, shall be held invalid or unenforceable, the provision shall be modified to the minimum extent necessary to make it or its application valid and enforceable, and the validity and enforceability of all other provisions of these Bylaws and all other applications of any provision shall not be affected thereby.

**Section 8.05 Emergency Management of the Corporation.** In anticipation of or during an emergency, as defined in G.L. c. 156D, § 3.03(d), the board, in order to conduct the ordinary business affairs of the Corporation, shall modify procedures, including, but not limited to, calling a board meeting, quorum requirements for such board meeting, and designation of additional or substitute Directors; provided that such modifications may not conflict with the Articles of Organization.

In anticipation of or during an emergency, the Corporation shall be able to take any and all of the following actions to conduct the Corporation's ordinary business affairs and operations:

- (a) Modify lines of succession to accommodate the incapacity of any Director, officer, employee, or agent resulting from the emergency.
- (b) Relocate the principal office, or designate alternative principal offices or regional offices.
- (c) Give notice to Directors in any practicable matter under the circumstances, including but not limited to publication and radio, when notice of a board meeting cannot be given in a manner prescribed by these Bylaws.
- (d) Deem that one or more officers present at a board meeting is a Director as necessary to achieve a quorum for that meeting.

**Section 8.06 Reports.** At the request of shareholders holding a majority of the outstanding shares of the Corporation, the Corporation shall provide all shareholders with notice of the availability of annual financial reports of the Corporation before the earlier the annual meeting of shareholders or 120 days after the close of the fiscal year. Such financial reports shall be prepared and provided to shareholders upon request in compliance with G.L. c. 156D, § 16.20.

**Section 8.07 Advisement of Counsel.** THE CULTIVATION, PRODUCTION AND SALE OF CANNABIS IS ILLEGAL UNDER FEDERAL LAW. NEITHER PARTY, NOR ATTORNEYS FOR COMPANY, HAVE MADE ANY REPRESENTATION TO THE CONTRARY.

## **ARTICLE IX AMENDMENT OF BYLAWS**

**Section 9.01 Amendment by Shareholders.** Shareholders may adopt, amend or repeal bylaws by the vote or written consent of the holders of a majority of the outstanding shares entitled to vote, except as otherwise provided by law, these Bylaws, or the Articles of Organization.

**Section 9.02 Amendment by Directors.** Subject to the rights of shareholders as provided in Section 9.01, and the statutory limitations of G.L. c. 156D, the board of Directors may adopt, amend, or repeal bylaws.

**CERTIFICATE OF SECRETARY  
OF  
The Green Lady Dispensary, Inc., a Massachusetts corporation**

The undersigned, Corbet Campbell, hereby certifies that he is the duly elected and acting Secretary of The Green Lady Dispensary, Inc., a Massachusetts corporation (the “**Corporation**”), and that the foregoing Bylaws were adopted as the Bylaws of the Corporation as of the filing of the Articles of Conversion of the Corporation, and that the same do now constitute the Bylaws of the Corporation.

IN WITNESS WHEREOF, the undersigned has executed this certificate on behalf of the Corporation as of this [DAY OF MONTH] day of [MONTH], [YEAR].

THE GREEN LADY DISPENSARY, INC.

By: \_\_\_\_\_  
Name: Corbet Campbell  
Title: Secretary



### **PLAN FOR OBTAINING LIABILITY INSURANCE**

The Green Lady Dispensary, Inc. (“TGLD”) will contract with an insurance provider to maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually and product liability coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually. The policy deductible will be no higher than \$5,000 per occurrence. TGLD will consider additional coverage based on availability and cost-benefit analysis.

If adequate coverage is unavailable at a reasonable rate, TGLD will place in escrow at least \$250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. TGLD will keep reports documenting compliance with 935 CMR 500.105(10): *Liability Insurance Coverage or Maintenance of Escrow* in a manner and form determined by the Commission pursuant to 935 CMR 500.000.





## **BUSINESS PLAN**

### Executive Summary

The Green Lady Dispensary, Inc. (“TGLD”) is a Marijuana Establishment (“ME”) committed to creating a safe and clean community environment providing consistent, high quality cannabis to Consumers who are 21 years or age and older, and registered patients.

### Products

In addition to traditional sativa, indica, and hybrid cannabis flower, TGLD will offer a wide range of products and services that will allow TGLD to serve customers and patients with a wide variety of needs. Products TGLD intends to offer include in addition to traditional flower, will include, but will not be limited to:

1. Concentrates
2. Topical Salves
3. Creams and Lotion
4. Patches
5. Oral Mucosal/Sublingual Dissolving Tablets
6. Tinctures
7. Oral Sprays
8. Inhalation Ready to Use CO2 Extracted Hash Oils
9. Pre-Dosed Oil Vaporizers
10. Ingestion Capsules
11. Food and Beverages

### Customers

TGLD’s target customers include serving Nantucket’s year-round residents, Nantucket’s summer residents, registered patients, and visitors to the island.

### What Drives Us

TGLD’s goals include maintaining the historic character and quaint island charm; providing on-island products and services negating the inconvenience and expense of traveling off island; stimulating and supporting the local island micro-economy to keep small businesses, jobs, and tax revenue on the island year-round; producing top quality products and services in every segment of TGLD’s operations; and cultivating 100% organically.

### Company Description

TGLD is a Massachusetts domestic for-profit corporation interested in applying for Certificates of Registration from the Commission to operate a vertically-integrated ME in the Commonwealth.

### Proposed Operations

Marijuana Cultivator, Marijuana Product Manufacturer, Marijuana Retailer, Modified On-Premise Testing System under 935 CMR 500.200.

TGLD will be located on the island of Nantucket, where TGLD has leased a facility at 11 Amelia Drive. The facility is well positioned in a centrally located business district. Before TGLD took over the facility, it was used as a dentist's office, and his residence within the facility has been completely repurposed on the interior to function as a retail store, cultivation space, commercial kitchen, and extraction lab. Despite the substantial changes made to the interior of the facility to accommodate TGLD's medical marijuana operations, the exterior of the facility still complies with the Nantucket Historic District Commission's strict aesthetic guidelines. The business will be launching with just one outlet in Nantucket and intends to focus its efforts on servicing year-round island residents and the influx of summer residents.

The facility encompasses a total of 7,594 square feet, with approximately 3,684 square feet dedicated exclusively to cultivation, 732 square feet retail dispensary, and approximately 3,178 square feet of space dedicated to supporting cultivation, extraction, commercial kitchen, mechanicals.

TGLD will establish inventory controls and procedures for conducting inventory reviews, and comprehensive inventories of marijuana products in the process of cultivation, as well as finished, stored marijuana. TGLD will tag and track all marijuana seeds, clones, plants, and marijuana products, using a seed-to-sale methodology in a form and manner to be approved by the Commission that integrates with Metrc.

No marijuana product, including marijuana, will be sold or otherwise marketed that is not tested by TGLD's modified on-premises testing system, as allowed under 935 CMR 500.200. TGLD will maintain records, including all records required in any section of 935 CMR 500.000, which will be available for inspection by the Commission, upon request. The records will be maintained in accordance with generally accepted accounting principles. Records will be maintained for at least 12 months.

TGLD will obtain and maintain general liability insurance coverage with Kinsale Insurance Company for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy shall be no higher than \$5,000 per occurrence.

TGLD shall provide adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110.

All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. Organic material, recyclable material, solid waste, and liquid waste containing marijuana or by-products of marijuana processing will be disposed of in compliance with all applicable state and federal requirements.

TGLD will demonstrate consideration of the factors for Energy Efficiency and Conservation outlined in 935 CMR 500.105(15) as part of its operating plan and application for licensure. Prior to commencing operations, TGLD will provide proof of having obtained a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation Fund to ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000 or the cessation of operation of TGLD.

TGLD and TGLD agents shall comply with all local rules, regulations, ordinances, and bylaws.

TGLD has achieved:

1. RMD Priority Certification with the Commission (RPA201895)
2. Letter of Support from the Nantucket Board of Selectmen to Operate a Registered Marijuana Dispensary – December 5, 2017
3. Nantucket Planning and Land User Services Special Permit (RMD) – December 11, 2017
4. Provisional Certificate of Registration from the Department of Public Health to Operate a Registered Marijuana Dispensary – February 8, 2018
5. RMD Architectural Review – In process
6. Host Community Agreement for Adult-Use Operations, executed on July 25, 2018

### Security

TGLD has contracted with a professional security and alarm company to design, implement, and monitor a comprehensive security plan to ensure that the facility is a safe and secure environment for employees and the local community.

TGLD's state-of-the-art security system will consist of perimeter windows, as well as duress, panic, and holdup alarms connected to local law enforcement for efficient notification and response in the event of a security threat. The system will also include a failure notification system that will immediately alert the executive management team if a system failure occurs.

A redundant alarm system will be installed to ensure that active alarms remain operational if the primary system is compromised.

Interior and exterior HD video surveillance of all areas that contain marijuana, entrances, exits, and parking lots will be operational 24/7 and available to the Nantucket Police Department. These surveillance cameras will remain operational even in the event of a power outage.

The exterior of the dispensary and surrounding area will be sufficiently lit and foliage will be minimized to ensure clear visibility of the area at all times.

Only TGLD's registered agents and other authorized visitors (e.g. contractors, vendors) will be allowed access to the facility, and a visitor log will be maintained in perpetuity.

All agents and visitors will be required to visibly display an ID badge, and TGLD will maintain a current list of individuals with access.

On-site consumption of marijuana by TGLD's employees and visitors will be prohibited.

TGLD will have a security personnel on-site during business hours.

### Benefits to the Town of Nantucket

TGLD looks forward to working cooperatively with Town of Nantucket (which approved 2016 Ballot Question 4 legalizing adult use marijuana with 63.8% of the vote) to ensure that TGLD operates as a responsible, contributing member of the Nantucket community. TGLD anticipates establishing a mutually beneficial relationship with the Town in exchange for permitting TGLD to site and operate in Nantucket. The Town stands to benefit in various ways, including but not limited to the following:

- Jobs
  - A co-located cultivation, processing, and retailing facility will add 20-30 full-time jobs, in addition to hiring qualified, local contractors and vendors.
- Monetary Benefits
  - A Host Community Agreement with significant monetary donations would provide the Town with additional financial benefits beyond local property taxes.
- Access to Quality Product
  - TGLD will allow qualified consumers in the Commonwealth to have access to high quality marijuana and marijuana products that are tested for cannabinoid content and contaminants.
- Control
  - In addition to the Commission, the Nantucket Police Department and other municipal departments will have oversight over TGLD's security systems and processes.
- Responsibility
  - TGLD is comprised of experienced cultivators and professionals who will be thoroughly background checked and scrutinized by the Commission.
- Economic Development
  - TGLD's renovation of 11 Amelia Drive will preserve the Mid-Island professional character and intermix with other businesses on Amelia Drive and contribute to the overall economic development of the local community.
- On-Island
  - TGLD will have internal testing processes for its products, necessitate by its location on Nantucket. TGLD hopes to offer these testing services to other marijuana businesses on the island.

### Zoning

In accordance with Nantucket's Zoning Bylaws, the proposed property is located in Nantucket's CN (Commercial Neighborhood) District.

TGLD will be located in a standalone facility and is not within a building or structure containing other retail, commercial, residential, industrial, or other uses, except for co-location with TGLD's licensed medical marijuana treatment center. There will be a minimum separation of 500 feet, measured between lot lines, between the TGLD facility and state-certified public or private schools or state-licensed day-care centers.

### Market Research

TGLD's proposed location is located on the island of Nantucket. There are no surrounding areas that would create competition except other marijuana establishments who are located on the island.

### Customers

In Massachusetts, sales are expected to increase from \$106 million in 2017 to \$457 million in 2018, and eventually to \$1.4 billion in 2025, according to New Frontier Data.

### Competitors

Presently TGLD has no competitors on Nantucket. The Town is currently considering adopting a limitation on the number of Marijuana Establishments in the Town at the next Town Meeting.

### Competitive Advantage

Competition abounds in every industry; however, the retail cannabis industry is known to be especially competitive due to the cost per individual unit sold at retail and, in some states, the ubiquity of storefronts, which forces companies to differentiate themselves from competitors or risk failing. TGLD possesses several strengths that will allow us to stand apart from our competition. The industry is rapidly growing, and customers are scrutinizing the quality of cannabis dispensed, the services offered, the location of the dispensary, discounts offered for the products, and to some extent, the branding of the business.

TGLD's competitive advantages over their competition include an experienced management team with many years of experience in running a successful manufacturing, packaging, distribution, sales, and marketing business that had to comply with its own set of state and federal regulations. Nantucket's island geography and unique charm and character offer the ultimate location for a singular retail dispensary experience.

### Regulations

TGLD will comply the applicable provisions of 935 CMR 500.000 *et seq.*, including the special regulations issued for Dukes County and Nantucket under 935 CMR 500.200.

TGLD will be registered to do business in the Commonwealth as a domestic business corporation or another domestic business entity in compliance with 935 CMR 500.000 and

maintain the corporation in good standing with the Massachusetts Secretary of the Commonwealth and the Department of Revenue.

TGLD will apply for all state and local permits and approvals required to renovate and operate the facility.

TGLD will also work cooperatively with various municipal departments to ensure that the proposed facility complies with all state and local codes, rules and regulations with respect to design, renovation, operation and security.

TGLD plans to have a co-located facility where TGLD will cultivate, manufacture, and sell marijuana products to consumers and--through its Certificate of Registration with the Department of Public Health--to patients and their registered caregivers as well.

#### Product & Service

TGLD strives to provide a great customer experience by training staff on communication skills, company culture and best practices for resolving customer service issues. Through this training, a higher quality of customer service will be achieved. Additionally, TGLD will offer customers a unique retail experience by using technology to showcase products and a beautifully designed interior retail space.

TGLD's cultivation space will utilize energy efficient lighting and HVAC systems in an effort to reduce any environmental impact. Our core product as a marijuana cultivator will be marijuana in flower form, which will come in a variety of strains and product types. We will also engage in the sale of MIPs. Through the use of a state-of-the-art supercritical CO2 extraction system, TGLD will have the ability to manufacture a wide range of extract products.

#### Pricing Structure

TGLD has a distinct advantage over retailers that are not vertically integrated with a cultivation center. It is TGLD's expectation that non-vertically integrated retailers will face product shortages and spiking prices due to increased market demand in the new adult-use market.

#### Growth Strategy

TGLD's plan to grow the company includes hosting community events, engaging adult-use consumers via social media, creating a unique retail destination, and creating unique products that appeal to an ever-evolving demographic. TGLD will consider the demographics of tourists and the population surge during the summer month as it relates to TGLD's operations and products offered.

#### Communication

TGLD will engage in reasonable marketing, advertising, and branding practices that are not otherwise prohibited in 935 CMR 500.105(4)(b) that do not jeopardize the public health, welfare or safety of the general public or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising and branding created for viewing by the public shall include the statement "Please Consume Responsibly," in a

conspicuous manner on the face of the advertisement and shall include a minimum of two of the warnings, located at 935 CMR 500.105(4)(a), in their entirety in a conspicuous manner on the face of the advertisement.

All marketing, advertising and branding produced by or on behalf of TGLD shall include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a<sup>1/2</sup>)(xxvi): “This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. **KEEP THIS PRODUCT AWAY FROM CHILDREN.** There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA.”

TGLD will communicate with our customers by website, [www.TheGreenLadyDispensary.com](http://www.TheGreenLadyDispensary.com), Facebook, Instagram, YouTube and Twitter. TGLD will provide a catalogue and a printed list of the prices and strains of marijuana available to consumers and will post the same catalogue and list on its website and in the retail store.

### Sales

TGLD will ensure that all marijuana products that are provided for sale to consumers or registered patients are sold in tamper or child-resistant packaging. Packaging for marijuana products sold or displayed for consumers and registered patients, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, will not be attractive to minors.

Packaging for marijuana products sold or displayed for consumers and registered patients in multiple servings will allow a consumer or patient to easily perform the division into single servings and include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica or Arial, including capitalization: “**INCLUDES MULTIPLE SERVINGS.**” TGLD will not sell multiple serving beverages and each single serving of an edible marijuana product contained in a multiple-serving package will be marked, stamped, or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product. At no point will an individual serving size of any marijuana product contain more than five (5) milligrams of delta-nine tetrahydrocannabinol.

### Logo

TGLD has developed a logo to be used in labeling, signage, and other materials such as letterhead and distributed materials.

The logo is discreet, unassuming, and does not use medical symbols, images of marijuana, related paraphernalia, or colloquial references to cannabis or marijuana. The logo can be found below:

# the Green Lady

## -Dispensary-

### Financial Projections

Fiscal Year	FIRST FULL FISCAL YEAR PROJECTIONS	SECOND FULL FISCAL YEAR PROJECTIONS	THIRD FULL FISCAL YEAR PROJECTIONS
Projected Revenue	\$3,900,000	\$5,850,000	\$7,800,000
Projected Expenses	\$4,063,855	\$5,409,355	\$6,943,855
VARIANCE:	(\$163,855)	\$440,645	\$856,145
Number of unique customers for the year	1,000	1,100	1,265
Number of customer visits for the year	16,000	26,400	30,360
Projected % of customer growth rate annually	---	10%	15%



Estimated purchased ounces per visit	.5	.5	.5
Estimated cost per ounce	\$ 350	\$ 325	\$ 300
Total FTEs in staffing	25	30	30
Total marijuana inventory for the year (in lbs.)	2442	3650	3750
Total marijuana sold for the year (in lbs.)	2300	3550	3600
Total marijuana left for roll over (in lbs.)	142	100	150

	First Full Fiscal Year	Second Full Fiscal Year	Third Full Fiscal Year
Real Estate Taxes	\$15,000	\$15,000	\$15,000
3% Impact Payment	\$117,000	\$175,500	\$234,000
3% Local Option Tax	\$105,300	\$157,950	\$210,600
Charitable Donations	\$10,000	\$10,000	\$10,000
Total Anticipated Payments	\$247,300	\$358,450	\$469,600

Fiscal Year	First Full Fiscal Year Projections	Second Full Fiscal Year Projections	Third Full Year Fiscal Projections
<b>Projected Revenue</b>	<b>\$3,900,000</b>	<b>\$5,850,000</b>	<b>\$7,800,000</b>
Production Costs:			
Wages (includes taxes & benefits)	\$1,120,000	\$1,440,000	\$2,000,000
Allocable Facility Costs	\$251,077	\$251,077	\$251,077
Allocable Utilities Costs	\$250,000	\$400,000	\$600,000

Edible Mfg Exp	\$50,000	\$75,000	\$100,000
Fertilizer/Supplies	\$75,000	\$100,000	\$150,000
<b>Total Production Costs</b>	<b>\$1,746,077</b>	<b>\$2,266,077</b>	<b>\$3,101,077</b>
Projected SG&A Expenses:			
Payroll	\$800,000	\$960,000	\$1,120,000
Occupancy	\$20,923	\$20,923	\$20,923
Licenses/Fees	\$50,000	\$50,000	\$50,000
Packaging	\$40,000	\$50,000	\$60,000
Lab Testing Supplies	\$20,000	\$20,000	\$20,000
Marketing	\$20,000	\$20,000	\$20,000
Supplies	\$20,000	\$25,000	\$30,000
Charitable	\$10,000	\$10,000	\$10,000
Other/Professional	\$100,000	\$120,000	\$140,000
HCA Fees	\$117,000	\$175,000	\$234,000
<b>Total SG&amp;A Costs</b>	<b>\$1,197,923</b>	<b>\$1,451,423</b>	<b>\$1,704,923</b>
<b>EBITDA</b>	<b>\$956,000</b>	<b>\$2,132,500</b>	<b>\$2,994,000</b>
Tax Expense	\$861,569	\$1,433,569	\$1,879,569
Depreciation	\$114,286	\$114,286	\$114,286
Interest Expense	\$144,000	\$144,000	\$144,000
<b>Profit/(Loss)</b>	<b>(\$163,855)</b>	<b>\$440,645</b>	<b>\$856,145</b>

### Founders

Nicole and Rupert Campbell are the co-founders of TGLD and are members of the Board of Directors. Nicole also serves as Treasurer, CFO, COO, and Head of Cultivation, and Rupert also serves as President, CEO and Head of Security.

Nicole began her career as the first employee of Growth Products, Ltd., an agricultural chemical company, in 1991, where over the past 26 years she has grown the company into an international supplier of agricultural chemicals and is now Owner and Chief Operating Officer. Nicole is also Owner and Controller at G.P. Solutions, LLC, a related agricultural chemical company. Through her experience at these companies, Nicole has gained significant knowledge regarding cultivation additives, such as fertilizers, micronutrients, organic plant foods, and biological pesticides. Furthermore, Nicole's experience in managing international permitting and compliant labeling in all 50 states and 35 countries translates directly to the medical cannabis industry and ensures that TGLD will maintain a focus on regulatory compliance. Nicole has received a Master's in Business Administration from Pace University, and she currently lives with her husband, Rupert, and their two daughters in Katonah, New York. Nicole has been a part-time resident of Nantucket since 2012, and she is committed to maintaining strong ties between TGLD and Nantucket.

Rupert began his career in the construction materials industry working for Borden Chemical, where he gained significant experience in manufacturing and processing systems, processes, and equipment. In 1997 Rupert joined Growth Products, Ltd., where he has managed the planning and construction of a fertilizer manufacturing facility with complex liquid reactors and has become the Senior Production Manager. During his time at Growth Products, Rupert has gained expertise in several facets of chemical manufacturing, such as dry augers, packaging systems, and assembly logistics. Rupert has also worked for the Katonah Fire Department since 1993, where he previously served as Captain and Lieutenant, and where he actively participates in the department's governance. During his time with the Katonah Fire Department, Rupert has been trained and certified by the New York State Division of Homeland Security and Emergency Services, New York State Fire Chiefs Association, Firemen's Association of the State of New York, with additional certifications in Hazardous Materials First Responder Operations, Confined Space Rescue, and Emergency Management. Rupert currently lives with his wife, Nicole, and their two daughters in Katonah, New York. Rupert and his family have been part-time residents of Nantucket since 2012, and Rupert looks forward to helping the patients of Nantucket by providing them with high-quality medicine.

### Team

TGLD has put together a team to implement the operations of the Marijuana Establishment. TGLD intends to create 20-30 full-time staff positions within the first three years of operations in Nantucket.

Corbet Campbell is the Secretary and a member of the Board of Directors of TGLD. As daughter to TGLD's CEO and COO, Corbet looks forward to growing this family-run business on Nantucket.

No individual on the TGLD team is a controlling person over more than three licenses in a particular class of license.



## **PLAN FOR SEPARATING RECREATIONAL FROM MEDICAL OPERATIONS**

The Green Lady Dispensary, Inc. (“TGLD”) has developed plans and procedures to ensure virtual and physical separation between medical and adult use marijuana operations in accordance with the requirements of 935 CMR 500.000 and 935 CMR 501.000.

TGLD will virtually separate medical and adult-use marijuana and Marijuana Products in its Cultivation and Product Manufacturing operations by using separate medical and adult-use plant and/or package tags in Metrc.

TGLD will ensure that registered patients have access to a sufficient quantity and variety of medical marijuana and marijuana products. For the first six (6) months of operations, 35% of TGLD’s marijuana product inventory will be marked for medical use and reserved for registered patients. Thereafter, TGLD will maintain a quantity and variety of medical marijuana products for registered patients that is sufficient to meet the demand indicated by an analysis of sales data collected during the preceding six (6) months. Marijuana products reserved for patient supply will, unless unreasonably impracticable, reflect the actual types and strains of marijuana products documented during the previous six (6) months. If a substitution must be made, the substitution will reflect the type and strain no longer available as closely as possible.

On a quarterly basis, TGLD will submit to the Commission an inventory plan to reserve a sufficient quantity and variety of medical marijuana and marijuana products for registered patients, based on reasonably anticipated patient needs as documented by sales records over the preceding six (6) months. On each occasion that the supply of any product within the reserved patient supply is exhausted and a reasonable substitution cannot be made, TGLD will submit a report to the Commission. Marijuana products reserved for patient supply will be either: (1) maintained on-site at TGLD’s retailer or easily accessible at another TGLD location and transferable to the retailer location within 48 hours of notification that the on-site supply has been exhausted. TGLD will perform audits of patient supply available on a weekly basis and retain those records for a period of six (6) months. TGLD may transfer marijuana products reserved for medical-use to adult-use within a reasonable period of time prior to the date of expiration provided that the product does not pose a risk to health or safety.

In addition to virtual separation, TGLD will provide for physical separation between the medical and adult use sales areas. A temporary or semi-permanent physical barrier, such as a stanchion or other divider, will be installed to create separate, clearly marked lines for patients/caregivers and adult-use consumers. Trained marijuana establishment agents will verify the age of all individuals, as well as the validity of any Medical Use of Marijuana Program ID Cards, upon entry to the facility and direct them to the appropriate queue. TGLD’s agents will prioritize patient and caregiver identification verification and physical entry into the retail area.

Access to the adult-use marijuana queue will be limited to individuals 21 years of age or older, regardless of if the individual is registered as a patient/caregiver. Registered patients under the age of 21 will only have access to the medical marijuana queue. A registered patient/caregiver 21 years of age or older will be permitted to access either queue and will not be limited only to the

medical marijuana queue, so long as the transaction can be recorded in accordance with 935 CMR 501.105.

TGLD will also provide an enclosed patient consultation area that is separate from the sales floor to allow privacy and for confidential visual and auditory consultation. The patient consultation area will have signage stating “Consultation Area” and will be accessible by patients and caregivers without having to traverse a Limited Access area.

TGLD will also maintain separate financial records for adult-use products and medical products to ensure compliance with the applicable tax laws.



## PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

Pursuant to 935 CMR 500.050(8)(b), The Green Lady Dispensary, Inc. (“TGLD”) will only be accessible to individuals, visitors, and agents who are 21 years of age or older with a verified and valid government-issued photo ID, or, if co-located with an MTC, Registered Qualifying Patients with the Medical Use of Marijuana Program in possession of a medical registration card. Upon entry into the premises of the marijuana establishment by an individual, visitor, or agent, a TGLD agent will immediately inspect the person’s proof of identification and determine the person’s age, in accordance with 935 CMR 500.140(2).

In the event TGLD discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1)(m). TGLD will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors in the Commonwealth or a like violation of the laws in other jurisdictions, pursuant to 935 CMR 500.030(1).

Pursuant to 935 CMR 500.105(4), TGLD will not engage in any advertising practices that are targeted to, deemed to appeal to or portray minors under the age of 21. TGLD will not engage in any advertising by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, including sponsorship of charitable, sporting or similar events, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data. TGLD will not manufacture or sell any edible products that resemble a realistic or fictional human, animal, fruit, or sporting-equipment item including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b). In accordance with 935 CMR 500.105(4)(a)(5), any advertising created for public viewing will include a warning stating, **“For use only by adults 21 years of age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of marijuana. Please Consume Responsibly.”** Pursuant to 935 CMR 500.105(6)(b), TGLD packaging for any marijuana or marijuana products will not use bright colors, defined as colors that are “neon” in appearance, resemble existing branded products, feature cartoons, a design, brand or name that resembles a non-cannabis consumer or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be marketed to minors. TGLD’s website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13).



## QUALITY CONTROL AND TESTING

### Quality Control

The Green Lady Dispensary, Inc. ("TGLD") will comply with the following sanitary requirements:

1. Any TGLD agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any TGLD agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
  - a. Maintaining adequate personal cleanliness; and
  - b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. TGLD's hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in TGLD's production areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. TGLD's facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. TGLD will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. TGLD's floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. TGLD's facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. TGLD's buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. TGLD will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items will not be stored in an area containing products used in the cultivation of marijuana. TGLD acknowledges and understands that the Commission may require TGLD to demonstrate the intended and actual use of any toxic items found on TGLD's premises;

11. TGLD will ensure that its water supply is sufficient for necessary operations, and that any private water source will be capable of providing a safe, potable, and adequate supply of water to meet TGLD's needs;
12. TGLD's plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and wastewater lines;
13. TGLD will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. TGLD will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. TGLD will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

TGLD's vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

TGLD will ensure that TGLD's facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

TGLD will follow established policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures are sufficient to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by TGLD to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.

Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated will be disposed of in accordance with the provisions of 935 CMR 500.105(12), and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

TGLD will process marijuana in a safe and sanitary manner. TGLD will process the leaves and flowers of the female marijuana plant only, which will be:

- Well-cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area.

All edible products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments, and



any marijuana product that is made to resemble a typical food or beverage product will be packaged and labeled as required by 935 CMR 500.105(5) and 500.105(6).

When selling or otherwise transferring marijuana to another marijuana establishment TGLD will provide documentation of its compliance with the testing requirements of 935 CMR 500.160: *Testing of Marijuana and Marijuana Products*, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect marijuana products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.

### Testing

TGLD will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

Any Independent Testing Laboratory relied upon by TGLD for testing will be licensed or registered by the Commission and (i) currently and validly licensed under 935 CMR 500.101: *Application Requirements*, or formerly and validly registered by the Commission; (ii) accredited to ISO 17025:2017 or the most current International Organization for Standardization 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission; (iii) independent financially from any Medical Marijuana Treatment Center, Marijuana Establishment or Licensee; and (iv) qualified to test marijuana and marijuana products, including marijuana-infused products, in compliance with M.G.L. c. 94C, § 34; M.G.L. c. 94G, § 15; 935 CMR 500.000: *Adult Use of Marijuana*; 935 CMR 501.000: *Medical Use of Marijuana*; and Commission protocol(s).

Testing of TGLD's marijuana products will be performed by an Independent Testing Laboratory in compliance with a protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission, including but not limited to, the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*. Testing of TGLD's environmental media will be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Commission.

TGLD's marijuana will be tested for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides. In addition to these contaminant tests, final ready-to-sell Marijuana Vaporizer Products shall be screened for heavy metals and Vitamin E Acetate (VEA) in accordance with the relevant provisions of the *Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations*. TGLD acknowledges and understands that the Commission may require additional testing.

TGLD's policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1) will include notifying the Commission (i) within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch and (ii) of any information regarding contamination as specified by the Commission immediately upon request by the Commission. Such notification will be from both TGLD and the Independent Testing Laboratory, separately and directly, and will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

TGLD will maintain testing results in compliance with 935 CMR 500.000 *et seq* and the record keeping policies described herein and will maintain the results of all testing for no less than one year. TGLD acknowledges and understands that testing results will be valid for a period of one year, and that marijuana or marijuana products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of TGLD's marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to TGLD for disposal or by the Independent Testing Laboratory disposing of it directly. All Single-servings of marijuana products will be tested for potency in accordance with 935 CMR 500.150(4)(a) and subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

Any marijuana or marijuana products that fail any test for contaminants must either be reanalyzed without remediation, remediated or disposed of. In the event marijuana or marijuana products are reanalyzed, a sample from the same batch shall be submitted for reanalysis at the ITL that provided the original failed result. If the sample passes all previously failed tests at the initial ITL, an additional sample from the same batch previously tested shall be submitted to a second ITL other than the initial ITL for a Second Confirmatory Test. To be considered passing and therefore safe for sale, the sample must have passed the Second Confirmatory Test at a second ITL. Any Marijuana or Marijuana Product that fails the Second Confirmatory Test will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees without first being remediated. Otherwise, any such product shall be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal*.

If marijuana or marijuana products are destined for remediation, a new test sample will be submitted to a licensed ITL, which may include the initial ITL for a full-panel test. Any failing Marijuana or Marijuana Product may be remediated a maximum of two times. Any Marijuana or Marijuana Product that fails any test after the second remediation attempt will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees and will be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal*.

#### Quality Control Samples

TGLD may create a sample of Marijuana Product ("Marijuana") to be provided internally to employees for purposes of ensuring product quality and making determinations about whether to

sell the Marijuana. Quality Control Samples and employee feedback regarding such samples will allow TGLD to produce the highest quality Marijuana Products for distribution on the adult use market.

Quality Control Samples provided to employees may not be consumed on TGLD's Premises nor may they be sold to another licensee or Consumer. Quality Control Samples will be tested in accordance with 935 CMR 500.160: Testing of Marijuana and Marijuana Products. TGLD will limit the Quality Control Samples provided to all employees in a calendar month period to the following aggregate amounts:

1. Five grams of Marijuana concentrate or extract, including but not limited to tinctures;
2. Five hundred milligrams of Edibles whereby the serving size of each individual sample does not exceed five milligrams and otherwise satisfies the potency levels set forth in 935 CMR 500.150(4): Dosing Limitations; and
3. Five units of sale per Cannabis product line and no more than six individual Cannabis product lines. For purposes of 935 CMR 500.130(8): Vendor Samples, a Cannabis product line shall mean items bearing the same Stock Keeping Unit Number.

If Quality Control Samples are provided as Vendor Samples pursuant to 935 CMR 500.130(8), they will be assigned a unique, sequential alphanumeric identifier and entered into the Seed-to-sale SOR in a form and manner to be determined by the Commission, and further, shall be designated as "Quality Control Sample."

Quality Control Samples will have a legible, firmly Affixed label on which the wording is no less than 1/16 inch in size containing at minimum the following information:

1. A statement that reads: "QUALITY CONTROL SAMPLE NOT FOR RESALE";
2. The name and registration number of the Marijuana Product Manufacturer;
3. The quantity, net weight, and type of Marijuana flower contained within the package; and
4. A unique sequential, alphanumeric identifier assigned to the Production Batch associated with the Quality Control Sample that is traceable in the Seed-to-sale SOR.

Upon providing a Quality Control Sample to an employee, TGLD will record:

1. The reduction in quantity of the total weight or item count under the unique alphanumeric identifier associated with the Quality Control Sample;
2. The date and time the Quality Control Sample was provided to the employee;
3. The agent registration number of the employee receiving the Quality Control Sample; and
4. The name of the employee as it appears on their agent registration card.



## **PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS**

### Overview

The Green Lady Dispensary, Inc. (“TGLD”) will securely maintain personnel records, including registration status and background check records. TGLD will keep, at a minimum, the following personnel records:

- Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
- A personnel record for each marijuana establishment agent;
- A staffing plan that will demonstrate accessible business hours and safe operating conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030.

### Agent Personnel Records

In compliance with 935 CMR 500.105(9), personnel records for each agent will be maintained for at least twelve (12) months after termination of the agent’s affiliation with TGLD and will include, at a minimum, the following:

- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- Documentation of verification of references;
- The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- Documentation of periodic performance evaluations;
- A record of any disciplinary action taken;
- Notice of completed responsible vendor and eight-hour related duty training; and
- Results of initial background investigation, including CORI reports.

Personnel records will be kept in a secure location to maintain confidentiality and be only accessible to the agent’s manager or members of the executive management team.

### Agent Background Checks

- In addition to completing the Commission’s agent registration process, all agents hired to work for TGLD will undergo a detailed background investigation prior to being granted access to a TGLD facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for TGLD pursuant to 935 CMR 500.030 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.
- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.030, TGLD will consider:

- a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.
- b. All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability.
- c. Where applicable, all look-back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.
- Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, TGLD will:
  - a. Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination.
  - b. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, TGLD will consider the following factors:
    - i. Time since the offense or incident;
    - ii. Age of the subject at the time of the offense or incident;
    - iii. Nature and specific circumstances of the offense or incident;
    - iv. Sentence imposed and length, if any, of incarceration, if criminal;
    - v. Penalty or discipline imposed, including damages awarded, if civil or administrative;
    - vi. Relationship of offense or incident to nature of work to be performed;
    - vii. Number of offenses or incidents;
    - viii. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
    - ix. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and
    - x. Any other relevant information, including information submitted by the subject.
  - c. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or

Other Types of Criminal History Information Received from a Source Other than the DCJIS.

- All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.
- Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.
- References provided by the agent will be verified at the time of hire.
- As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by TGLD or the Commission.

Personnel Policies and Training

As outlined in TGLD's Record Keeping Procedures, a staffing plan and staffing records will be maintained in compliance with 935 CMR 500.105(9) and will be made available to the Commission, upon request. All TGLD agents are required to complete training as detailed in TGLD's Qualifications and Training plan which includes but is not limited to TGLD's strict alcohol, smoke and drug-free workplace policy, job specific training, Responsible Vendor Training Program, confidentiality training including how confidential information is maintained at the marijuana establishment and a comprehensive discussion regarding the marijuana establishment's policy for immediate dismissal. All training will be documented in accordance with 935 CMR 105(9)(d)(2)(d).

TGLD will have a policy for the immediate dismissal of any dispensary agent who has:

- Diverted marijuana, which will be reported the Police Department and to the Commission;
- Engaged in unsafe practices with regard to TGLD operations, which will be reported to the Commission; or
- Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.



## RECORDKEEPING PROCEDURES

### General Overview

The Green Lady Dispensary, Inc. (“TGLD”) has established policies regarding recordkeeping and record-retention in order to ensure the maintenance, safe keeping, and accessibility of critical documents. Electronic and wet signatures are accepted forms of execution of TGLD documents. Records will be stored at TGLD in a locked room designated for record retention. All written records will be available for inspection by the Commission upon request.

### Recordkeeping

To ensure that TGLD is keeping and retaining all records as noted in this policy, reviewing Corporate Records, Business Records, and Personnel Records to ensure completeness, accuracy, and timeliness of such documents will occur as part of TGLD’s quarter-end closing procedures. In addition, TGLD’s operating procedures will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis.

- Corporate Records

Corporate Records are defined as those records that require, at a minimum, annual reviews, updates, and renewals, including:

- Insurance Coverage:
  - Directors & Officers Policy
  - Product Liability Policy
  - General Liability Policy
  - Umbrella Policy
  - Workers Compensation Policy
  - Employer Professional Liability Policy
- Third-Party Laboratory Contracts
- Commission Requirements:
  - Annual Agent Registration
  - Annual Marijuana Establishment Registration
- Local Compliance:
  - Certificate of Occupancy
  - Special Permits
  - Variances
  - Site Plan Approvals
  - As-Built Drawings
- Corporate Governance:
  - Annual Report
  - Secretary of Commonwealth Filings

- Business Records

Business Records require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:

- Assets and liabilities;
- Monetary transactions;
- Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products;

- Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over TGLD.
- Personnel Records
  - At a minimum, Personnel Records will include:
    - Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
    - A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with TGLD and will include, at a minimum, the following:
      - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
      - Documentation of verification of references;
      - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
      - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
      - Documentation of periodic performance evaluations; and
      - A record of any disciplinary action taken.
      - Notice of completed responsible vendor and eight-hour related duty training.
    - A staffing plan that will demonstrate accessible business hours and safe operating conditions;
    - Personnel policies and procedures; and
    - All background check reports obtained in accordance with 935 CMR 500.030: Registration of Marijuana Establishment Agents 803 CMR 2.00: Criminal Offender Record Information (CORI).
- Handling and Testing of Marijuana Records
  - TGLD will maintain the results of all testing for a minimum of one (1) year.
- Inventory Records
  - The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Seed-to-Sale Tracking Records
  - TGLD will use Metrc as the seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(e), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.



- Incident Reporting Records
  - Within ten (10) calendar days, TGLD will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident.
  - All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by TGLD for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within TGLD's jurisdiction on request.
- Visitor Records
  - A visitor sign-in and sign-out log will be maintained at the security office. The log will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.
- Waste Disposal Records
  - When marijuana or marijuana products are disposed of, TGLD will create and maintain an electronic record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two TGLD agents present during the disposal or other handling, with their signatures. TGLD will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Security Records
  - A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
  - Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.
  - Recordings shall not be destroyed or altered and shall be retained as long as necessary if TGLD is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.
- Transportation Records
  - TGLD will retain all transportation manifests for a minimum of one (1) year and make them available to the Commission upon request.
- Vehicle Records (as applicable)
  - Records that any and all of TGLD's vehicles are properly registered, inspected, and insured in the Commonwealth and shall be made available to the Commission on request.
- Agent Training Records

- Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).
- Responsible Vendor Training
  - TGLD shall maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.
- Closure
  - In the event TGLD closes, all records will be kept for at least two (2) years at TGLD's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, TGLD will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.
- Written Operating Policies and Procedures

Policies and Procedures related to TGLD's operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Policies and Procedures will include the following:

  - Security measures in compliance with 935 CMR 500.110;
  - Employee security policies, including personal safety and crime prevention techniques;
  - A description of TGLD's hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
  - Storage of marijuana in compliance with 935 CMR 500.105(11);
  - Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
  - Price list for Marijuana and Marijuana Products, and alternate price lists for patients with documented Verified Financial Hardship as defined in 501.002: *Definitions*, as required by 935 CMR 501.100(1)(f);
  - Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
  - Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
  - A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
  - Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
  - Alcohol, smoke, and drug-free workplace policies;
  - A plan describing how confidential information will be maintained;
  - Policy for the immediate dismissal of any dispensary agent who has:
    - Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission;
    - Engaged in unsafe practices with regard to TGLD operations, which will be reported to the Commission; or

- Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
  - A list of all board of directors, members, and executives of TGLD, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on TGLD's website.
  - Policies and procedures for the handling of cash on TGLD premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
  - Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
  - Policies and procedures for energy efficiency and conservation that will include:
    - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
    - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
    - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
    - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
  - Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.
- License Renewal Records
  - TGLD shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Record-Retention

TGLD will meet Commission recordkeeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations.



## MAINTAINING OF FINANCIAL RECORDS

The Green Lady Dispensary, Inc.'s ("TGLD") operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission's Adult Use of Marijuana regulations (935 CMR 500). Financial records maintenance measures include policies and procedures requiring that:

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
  - Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
    - Assets and liabilities;
    - Monetary transactions;
    - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
    - Sales records including the quantity, form, and cost of marijuana products; and
    - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over TGLD.
- All sales recording requirements under 935 CMR 500.140(5) are followed, including:
  - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
  - Prohibiting the use of software or other methods to manipulate or alter sales data;
  - Conducting a monthly analysis of its equipment and sales data, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
    - If TGLD determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data: 1. it shall immediately disclose the information to the Commission; 2. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and 3. take such other action directed by the Commission to comply with 935 CMR 500.105.
  - Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
  - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;
  - Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500; and

- If co-located with a medical marijuana treatment center, maintaining and providing the Commission on a biannual basis accurate sales data collected by the licensee during the six (6) months immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products under 935 CMR 500.140(15).
- Additional written business records will be kept, including, but not limited to, records of:
  - Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
  - Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
  - Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission's regulations.
- License Renewal Records
  - TGLD shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.



## QUALIFICATIONS AND TRAINING

The Green Lady Dispensary, Inc. (“TGLD”) will ensure that all employees hired to work at a TGLD facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

### Qualifications

In accordance with 935 CMR 500.030, a candidate for employment as a marijuana establishment agent must be 21 years of age or older. In addition, the candidate cannot have been convicted of a criminal offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States, or foreign jurisdiction, or a military, territorial, or Native American tribal authority.

TGLD will also ensure that its employees are suitable for registration consistent with the provisions of 935 CMR 500.802. In the event that TGLD discovers any of its agents are not suitable for registration as a marijuana establishment agent, the agent’s employment will be terminated, and TGLD will notify the Commission within one (1) business day that the agent is no longer associated with the establishment.

### Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of TGLD’s agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent’s job function. A TGLD Agent will receive a total of eight (8) hours of training annually. A minimum of four (4) hours of training will be from Responsible Vendor Training Program (“RVT”) courses established under 935 CMR 500.105(2)(b). Any additional RVT over four (4) hours may count towards the required eight (8) hours of training.

Non-RVT may be conducted in-house by TGLD or by a third-party vendor engaged by the TGLD. Basic on-the-job training in the ordinary course of business may also be counted towards the required eight (8) hour training.

All TGLD Agents that are involved in the handling or sale of marijuana at the time of licensure or renewal of licensure will have attended and successfully completed the mandatory Responsible Vendor Training Program operated by an education provider accredited by the Commission.

### *Basic Core Curriculum*

TGLD Agents must first take the Basic Core Curriculum within 90 days of hire, which includes the following subject matter:

- Marijuana's effect on the human body, including:
  - Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
  - The amount of time to feel impairment;
  - Visible signs of impairment; and
  - Recognizing the signs of impairment.
- Diversion prevention and prevention of sales to minors, including best practices.

- Compliance with all tracking requirements.
- Acceptable forms of identification. Training must include:
  - How to check identification;
  - Spotting and confiscating fraudulent identification;
  - Common mistakes made in identification verification.
  - Prohibited purchases and practices, including purchases by persons under the age of 21 in violation of M.G.L. c. 94G, § 13.
- Other key state laws and rules affecting TGLD Agents which shall include:
  - Conduct of TGLD Agents;
  - Permitting inspections by state and local licensing and enforcement authorities;
  - Local and state licensing and enforcement, including registration and license sanctions;
  - Incident and notification requirements;
  - Administrative, civil, and criminal liability;
  - Health and safety standards, including waste disposal;
  - Patrons prohibited from bringing marijuana and marijuana products onto licensed premises;
  - Permitted hours of sale;
  - Licensee responsibilities for activities occurring within licensed premises; xix. Maintenance of records, including confidentiality and privacy; and
  - Such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program.

TGLD will encourage administrative employees who do not handle or sell marijuana to take the “Responsible Vendor” program on a voluntary basis to help ensure compliance. TGLD’s records of Responsible Vendor Training Program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other applicable licensing authority on request.

After successful completion of the Basic Core Curriculum, each TGLD Agent involved in the handling or sale of marijuana will fulfill the four-hour RVT requirement every year thereafter for TGLD to maintain designation as a Responsible Vendor. Once the TGLD Agent has completed the Basic Core Curriculum, the Agent is eligible to take the Advanced Core Curriculum. Failure to maintain Responsible Vendor status is grounds for action by the Commission.





## ENERGY COMPLIANCE PLAN

The Green Lady Dispensary, Inc. (“TGLD”) is currently exploring potential energy-use reduction opportunities such as natural lighting and energy efficiency measures and a plan for implementation of such opportunities. TGLD will update this plan as necessary and will further provide relevant documentation to the Commission during Architectural Review and during inspections processes.

### Potential Energy-Use Reduction Opportunities

TGLD is considering the following potential opportunities for energy-use reduction and plans for implementation of such opportunities.

1. Natural Lighting;
2. Energy efficient exterior wall construction, which may include batt insulation, continuous rigid insulation, and air and vapor barriers; and
3. Plumbing fixtures that are Water Sense rated for reduced water consumption.

As the need and opportunity for facility upgrades and maintenance arise in the future and the company becomes cash flow positive, TGLD will continue to evaluate energy-use reduction opportunities.

### Renewable Energy Generation Opportunities

TGLD is in the process of considering opportunities for renewable energy generation (including wind and solar options). TGLD’s preliminary examination of renewable energy generation has determined that the upfront costs of such options are too expensive at this time, although TGLD may reconsider at a future date. TGLD will also consult with its architects and engineers when designing the facility to determine the building’s capacity for renewable energy options (e.g. whether or not the roof can support the weight of solar panels). Nevertheless, our team is dedicated to consistently strive for sustainability and emissions reduction.

### Strategies to Reduce Electric Demand

TGLD is considering the following strategies to reduce electric demand:

1. Exterior and interior glazing on windows such that maximum natural daylight can enter the building without compromising security, reducing the reliance on artificial light during daytime hours;
2. Lighting fixtures that are energy efficient and used with Energy Star rated bulbs; and
3. Room lighting and switching will have occupancy sensors to reduce electrical consumption when rooms are unoccupied.

As the need and opportunity for facility upgrades and maintenance arise in the future and the company becomes cash flow positive, TGLD will continue to evaluate strategies to reduce electric demand.

### Opportunities for Engagement with Energy Efficiency Programs

TGLD also plans on engaging with energy efficiency programs offered by Mass Save and the Massachusetts Clean Energy Center and will coordinate with municipal officials to identify other

potential energy saving programs and initiatives. TGLD will also coordinate with its utility companies to explore any energy efficiency options available to TGLD.



## **PRODUCT MANUFACTURING SAFETY PLAN**

In accordance with 935 CMR 500.105(3)(c), The Green Lady Dispensary, Inc. (“TGLD”) will ensure that all edibles will be prepared, handled and stored in compliance with the sanitation requirements in 105 CMR 590.000: *State sanitary code chapter X: Minimum Sanitation Standards for Food Establishments*.

### **Agent Hygiene Practices**

TGLD agents will follow thorough hygienic practices and will maintain adequate personal cleanliness. All TGLD agents will wash their hands thoroughly before starting work, and at any other time when hands may have become soiled or contaminated. Hand-washing facilities will be placed conveniently within the TGLD facility and will be equipped with running water, effective hand-cleaning and sanitizing preparations, suitable drying devices, and sufficient storage for all cleaning and sanitation materials. All TGLD agents will also wear food grade disposable gloves when handling marijuana and in the creation of marijuana products.

Any agent who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion (e.g., boils, sores, infected wounds), or any other abnormal source of microbial contamination for which there is a reasonable possibility of contact with cannabis shall be excluded from any operations that may be expected to result in microbial contamination until the condition is corrected.

### **Food Material Practices**

Food material used in the preparation of marijuana products will be acquired from an approved source. Any and all materials used in the production of marijuana products that can support the rapid growth of undesirable microorganisms will be stored in a manner that prevents the growth of such microorganisms, such as proper refrigeration or other appropriate storage. All thermometers used in the storage and preparation of marijuana products will be tested regularly to ensure accuracy. All food products will be properly stored in their original containers and will be properly labeled. Only approved food additives will be used. Marijuana products and food products used in the production of marijuana products will be maintained in good condition and will be unadulterated.

### **Food Contact Surface Sanitation Practices**

The Company recognizes the importance of properly washing, rinsing, and sanitizing food preparation equipment, utensils, and all surfaces that come into contact with food to reduce the number of bacteria, prevent the spread of bacteria, and eliminate the possibility of cross-contamination. TGLD will institute the following sanitation procedures in its commercial kitchen:

- Sanitizing solution should be used in the kitchen and other areas to sanitize food contact surfaces and utensils prior to use.
- All surfaces that come into contact with food will be washed, rinsed, and sanitized after each use, when an agent begins working with another type of food, anytime an agent is interrupted during a task and the tools or items they have been working with may have become contaminated, or at four-hour intervals if the areas or items are in constant use.

- Sanitizing solution will be stored in buckets or other containers such as a spray bottle and used with wiping cloths to sanitize prep tables, prep sinks, dining room tables, bar area, and working utensils; in the third compartment of a 3-compartment sink to sanitize all dishes that are washed; and use the final rinse in the dish machine to sanitize all dishes that are washed.
  - The chlorine-based solution will be prepared each morning, using the following recipe:

Minimum concentration: 50ppm <b>Range recommended: 50-100ppm.</b> Do not exceed 200 ppm.	Amount needed per unit of water		
	per 2 quarts	per gallon	per 12 gallons
<b>Use provided test strips.</b> Check the temperature of the water for recommend temperature of 75-120 degrees Fahrenheit.	½ tsp.	1 tsp.	1/4 cup

- The sanitizing solution will be measured, tested, and placed into red sanitization bins and used to wipe down surfaces that will then air-dry.
- The third bay in the bay sinks will be filled with the solution, in order to soak utensils, cookware and labware, for a minimum of one (1) minute, and will air-dry.
- Agents will ensure that all wiping cloths are soaked with sanitizer when cleaning food contact surfaces (like cutting boards, prep tables, slicers, etc.) and stored in sanitizer when not in use.
- Sanitizer buckets will be set up at all times in areas where food is being handled. Agents will check sanitizer solutions frequently to ensure that they are at the correct concentration, using the proper test strips for the type of sanitizing chemical that they are using.
- Sanitizer solutions will be changed as needed to properly sanitize food contact surfaces.
- Cleaning of all equipment, work surfaces, laboratory glassware and kitchen cookware can be challenging given the non-aqueous nature of cannabis concentrate. Often, strong solvents such as acetone must be used to chemically dissolve hard-to-clean cannabis concentrate. When acetone is used to clean surfaces, a solvent respirator must be worn to

prevent inhalation of fumes. When acetone is used to clean lab glass and utensils, soaking must be done under the fume hood located in the TGLD facility, at all times. Used solvent will be disposed of in the provided solvent-waste bin, which is only to be removed by a chemical waste disposal professional.

- Equipment and utensils utilized in the TGLD facility be so designed and of such material and workmanship as to be adequately cleanable.

### **Training**

All agents will complete mandatory safety training sessions. TGLD agents and TGLD management will have the following responsibilities when it comes to health and safety:

- **TGLD Management:**
  - Ensure the health and safety of all agents.
  - Correct any workplace conditions that are hazardous to the health and safety of agents.
  - Inform agents about any remaining hazards.
  - Make copies of the OSHA Regulations and any workers compensation requirements available by posting throughout the facility.
  - Ensure agents know their rights and responsibilities under OSHA Regulations and the Commission's requirements and that they comply with them.
  - Provide and maintain protective devices, equipment, and clothing, and ensure that agents use them.
  - Provide agents with education, supervision, and training specific to equipment.
  - Perform ongoing reviews and updates to policies and procedures as needed.
- **TGLD Agents:**
  - Take care to protect health and safety and the health and safety of others who may be affected by individual actions.
  - Comply with all regulations and other legal requirements.
  - Follow established safe work procedures.
  - Use the required personal protective equipment.
  - Refrain from horseplay or similar conduct that may endanger others.
  - Ensure individual ability to work safely is not impaired by drugs or alcohol.
  - Report accidents and other incidents (including near misses) to the manager on duty.
  - Report the following to the manager on duty:
    - A hazard that might endanger TGLD agents;
    - A problem with personal protective equipment or clothing; or
    - Any suggestions to improve workplace safety.

### **Cleanliness & Sanitation Training:**

TGLD will combine its existing successful agent training program, supplemented with Commission rules and cannabis specific training to provide exhaustive training curricula to all agents. TGLD's training will include USDA Good Handling Practices and Quality Systems, FDA Current Good Manufacturing Practices, and sickness or illness policies. Agents who handle cannabis will receive hygiene training with specific attention to preventing microbial contamination. All employees will receive, at a minimum, the following quality assurance and contamination prevention training:

- USDA Good Handling Practices and Quality Systems, including but not limited to 21 CFR part 110.
- Product care, inspection, and maintenance techniques.
- Company policies which prohibit employees showing signs of illness, open wounds, sores, or skin infections from handling cannabis or materials that come into contact with cannabis.
- Hygiene training for employees who handle cannabis with specific attention to preventing microbial contamination.
- Handwashing requirements, including washing hands with soap and hot water before beginning work, after using the bathroom, and after meal breaks.
- Quality assurance procedures and consequences of failing to follow the company's established processes; and
- ServSafe certification training.

#### TGLD Lab and Production Agent Health and Safety Program

TGLD has identified eight basic components which have been identified to help prevent accidents and injuries from happening in the TGLD facility, as well as to help deal effectively with any incidents that do occur. These components are:

- Hazard Identification & Risk Control—determine which hazards are present in the workplace and take steps to eliminate or minimize such hazard.
- Safe Work Procedures:
  - Dealing with wet surfaces;
  - Wearing proper personal protective equipment and clothing;
  - Handling solvents with use of protective gloves and proper ventilation; and
  - Using proper body mechanics when lifting heavy objects.
- Orientation, Education, Training & Supervision—properly prepare agents for job duties and ensure policies and procedures are consistently followed.
- Safety Inspections—regular safety inspections throughout the TGLD facility, which will help identify workplace hazards so that they can be eliminated or controlled.
- Incident Investigation—determine cause of accident or injury and implement preventive measures.
- Health and Safety Meetings—regular meetings to provide an opportunity for agents and managers to communicate any concerns about health and safety.
- First Aid—determine what level of first aid is necessary on-site.
- Records & Statistics—maintain documentation to help identify recurring problems and ensure that hazardous conditions are corrected.

An annual Health and Safety Program review will be carried out to address current concerns.

When selling or otherwise transferring marijuana to another marijuana establishment TGLD will provide documentation of its compliance with the testing requirements of 935 CMR 500.160: *Testing of Marijuana and Marijuana Products*, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect marijuana products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.

## Diversity Plan

### Overview

The Green Lady Dispensary, Inc. (“TGLD”) believes in creating and sustaining a robust policy of inclusivity and diversity. TGLD recognizes that diversity in the workforce is key to the integrity of a company’s commitment to its community.

TGLD’s comprehensive diversity empowerment plan is a pillar of its purpose-driven company. To better serve TGLD’s customers, TGLD aims to create an environment where personal identities, race, military service, sexual orientation, and heritage are utilized, celebrated, and valued. TGLD’s diversity initiatives and strategies are designed to attract, develop, and advance the most talented individuals regardless of their race, sexual orientation, religion, age, gender, disability status, or any other dimension of diversity.

### Diversity Recruitment and Sourcing

TGLD will establish and maintain an inclusive and diverse workforce to serve its customers through innovative corporate recruitment of underrepresented and minority communities.

TGLD’s goals include:

- Ensure that 30% of our workforce is comprised of minorities;
- Ensure that 50% of our workforce is comprised of women;
- Ensure that 10% of our workforce is comprised of veterans;
- Ensure that 5% of our workforce is comprised of people with disabilities;
- Ensure that 20% of our workforce is comprised of people who identify as LGBTQ+;
- Ensure that at least 5% of our vendor or vendor spending is with Women Business Enterprises, Minority Business Enterprises, Veteran Business Enterprises, LGBT Business Enterprises, or Disability-Owned Business Enterprises; and
- TGLD will host and prepare two internal educational training sessions annually on cultural sensitivity and recognizing unconscious bias. Topics include but may not be limited to diversity and inclusion, unconscious bias, and microaggressions.

TGLD’s recruitment efforts are designed to maintain a steady flow of qualified diverse applicants and includes the following steps:

- Ensuring that job openings are sent to the diverse communities through publications including the Rainbow Times and Bay State Banner at least once annually;
- Utilizing the Massachusetts Supplier Diversity Office’s Directory of Certified Businesses when hiring vendors; and
- Utilizing Zip Recruiter to reach over 100 online career and job websites, as well as social media.

Measurement beginning upon receipt of TGLD’s first Provisional License from the Commission to operate a marijuana establishment in the Commonwealth, TGLD will utilize the below proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license:

- Ensure that 30% of our workforce is comprised of minorities;
- Ensure that 50% of our workforce is comprised of women;
- Ensure that 10% of our workforce is comprised of veterans;
- Ensure that 5% of our workforce is comprised of people with disabilities;
- Ensure that 20% of our workforce is comprised of people who identify as LGBTQ+;
- TGLD will document vendor or vendor spending to ensure at least 5% of our vendor or

- vendor spending is with Women Business Enterprises, Minority Business Enterprises, Veteran Business Enterprises, LGBT Business Enterprises, or Disability-Owned Business Enterprises; and
- TGLD will host and prepare two internal educational training sessions annually on cultural sensitivity and recognizing unconscious bias. Topics include but may not be limited to, harassment policies, disability rights and diversity and inclusion.

The Diversity Committee will review and evaluate TGLD's measurable outcomes no less than once a year to ensure that TGLD is meeting its commitments. TGLD is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

#### Acknowledgements

TGLD will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment. Any actions taken, or programs instituted, by TGLD will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.