



Massachusetts Cannabis Control Commission

Marijuana Cultivator

General Information:

License Number: MC283662
Original Issued Date: 06/14/2022
Issued Date: 06/14/2022
Expiration Date: 06/14/2023

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: True Cannabis, Inc.

Phone Number: 248-736-3308
Email Address: cyatooma@msycapital.com

Business Address 1: 2 Bellor Road
Business City: Heath
Business State: MA
Business Zip Code: 01346
Business Address 2:
Mailing Address 1: 45 School Street
Mailing City: Boston
Mailing State: MA
Mailing Zip Code: 02108
Mailing Address 2: Suite 202

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

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: 100
Role: Owner / Partner
Percentage Of Control: 100
Other Role: President

First Name: Christopher Last Name: Yatooma Suffix:

Gender: Male User Defined Gender:

What is this person's race or ethnicity?: Some Other Race or Ethnicity

Specify Race or Ethnicity: Chaldean

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Christopher Last Name: Yatooma Suffix:

Types of Capital: Monetary/ Other Type of Capital: Total Value of the Capital Provided: Percentage of Initial Capital:

Equity \$25000000 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 92 Sadoga Road

Establishment Address 2:

Establishment City: Heath Establishment Zip Code: 01346

Approximate square footage of the Establishment: 200000 How many abutters does this property have?: 12

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

Cultivation Tier: Cultivation Environment:

FEE QUESTIONS

Cultivation Tier: Tier 11: 90,001 to 100,000 sq. ft Cultivation Environment: Outdoor

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	EXECUTED HCA Certification Form - True Cannabis Inc.pdf	pdf	61b936a4d3dd284475be2200	12/14/2021
Plan to Remain Compliant with Local Zoning	True Cannabis_Plan to Remain Compliant with Local Zoning.pdf	pdf	61cc9a6e7baa3f462ea49e35	12/29/2021
Community Outreach Meeting Documentation	True Cannabis_COM Documentation.pdf	pdf	61ef5bbf71cb79087958cce9	01/24/2022

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
Other	True Cannabis_Letter from Community Legal Aid.pdf	pdf	61ef5c4d25efbc089300db8a	01/24/2022
Plan for Positive Impact	4.11.22 Positive Impact Plan - True Cannabis.pdf	pdf	625491b13eefeb000a299acc	04/11/2022

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner **Other Role:** President
First Name: Christopher **Last Name:** Yatooma **Suffix:**
RMD Association: Not associated with an RMD
Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	True Cannabis_Articles of Organization.pdf	pdf	61b9389f84fb17447c43b3a7	12/14/2021
Department of Revenue - Certificate of Good standing	True Cannabis_DUA Attestation.pdf	pdf	61bc07a1bf093f460253e76a	12/16/2021
Secretary of Commonwealth - Certificate of Good Standing	True Cannabis_SoC CoGS.pdf	pdf	61bc07a3073d79445b0d3986	12/16/2021
Bylaws	True Cannabis_Bylaws.pdf	pdf	61bc07a4d4f4b84609a57d66	12/16/2021
Department of Revenue - Certificate of Good standing	True Cannabis_DoR CoGS.pdf	pdf	61bc07a5d2f0bb446ad243bd	12/16/2021

No documents uploaded

Massachusetts Business Identification Number: 001541134

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	True Cannabis - Business Plan.pdf	pdf	61ce3367d4f4b84609a5b1d1	12/30/2021
Proposed Timeline	True Cannabis - Proposed Timeline.pdf	pdf	61ce33707baa3f462ea4a4b9	12/30/2021
Plan for Liability Insurance	True Cannabis - Liability Insurance.pdf	pdf	61ce337dd2f0bb446ad279e4	12/30/2021

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Policies and Procedures for cultivating.	True Cannabis - Outdoor Cultivation Procedures.pdf	pdf	61ce33b9bccaf2464fd822eb	12/30/2021
Restricting Access to age 21 and older	True Cannabis - Restricting Access.pdf	pdf	61ce33c2d2f0bb446ad279ea	12/30/2021
Security plan	True Cannabis - Security Plan.pdf	pdf	61ce33c70183444639b60050	12/30/2021
Prevention of diversion	True Cannabis - Prevention of Diversion.pdf	pdf	61ce33d2bccaf2464fd822ef	12/30/2021
Storage of marijuana	True Cannabis - Storage.pdf	pdf	61ce33d790ca3b46232e3412	12/30/2021
Transportation of marijuana	True Cannabis - Transportation.pdf	pdf	61ce33dd0b55784640e08947	12/30/2021
Inventory procedures	True Cannabis - Inventory.pdf	pdf	61ce33e4fcc7605b21aa0738	12/30/2021
Quality control and testing	True Cannabis - Quality Control and Testing.pdf	pdf	61ce33f0bccaf2464fd822f3	12/30/2021
Personnel policies including background checks	True Cannabis - Personnel Policies.pdf	pdf	61ce33f7d4f4b84609a5b1d7	12/30/2021
Record Keeping procedures	True Cannabis - Recordkeeping.pdf	pdf	61ce33ff7baa3f462ea4a4bf	12/30/2021
Maintaining of financial records	True Cannabis - Financial Records.pdf	pdf	61ce34090b55784640e0894b	12/30/2021
Qualifications and training	True Cannabis - Qualifications and Training.pdf	pdf	61ce340f151a044618ec7efd	12/30/2021
Energy Compliance Plan	True Cannabis - Energy Compliance.pdf	pdf	61ce341412daf94439385800	12/30/2021
Diversity plan	4.11.22 Diversity Plan - True Cannabis.pdf	pdf	625491d65e562200081e8c2d	04/11/2022

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

HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 8:00 PM
Tuesday From: 8:00 AM	Tuesday To: 8:00 PM
Wednesday From: 8:00 AM	Wednesday To: 8:00 PM
Thursday From: 8:00 AM	Thursday To: 8:00 PM
Friday From: 8:00 AM	Friday To: 8:00 PM
Saturday From: 8:00 AM	Saturday To: 8:00 PM
Sunday From: 8:00 AM	Sunday To: 8:00 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:

True Cannabis, Inc.

2. Name of applicant’s authorized representative:

Christopher Yatooma

3. Signature of applicant’s authorized representative:



4. Name of municipality:

Heath

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

Select Board by Town Coordinator Hilma A Sumner



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

Hilma A Sumner

Digitally signed by Hilma A Sumner
Date: 2021.12.01 12:08:02 -05'00'

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).*):

bos@townofheath.org

8. Host community agreement execution date:

11/23/21



PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

True Cannabis, Inc. (“True Cannabis”) will remain compliant at all times with the local zoning requirements set forth in the Heath’s Zoning By-Law. In accordance with Zoning By-Law Section 7, True Cannabis’ proposed Outdoor Cultivator is located in the Zoning District designated for an Outdoor Cultivator.

In compliance with Section 7.2.2 of Heath’s Zoning By-Law, the property is not located within two hundred-fifty feet (250 feet) from a property used as a preschool with outdoor play areas that is licensed with the Massachusetts Department of Early Education and Care, or town-owned property with an outdoor play area or a private or public school providing education in kindergarten or any of grades 1 through 12 or the Heath Public Library.

As required by Heath’s Zoning By-Law, True Cannabis will apply for a Special Permit and/or Site Plan Approval, as applicable, from the local Special Permit Granting Authority. In accordance with MGL Ch. 40A § 9, the Special Permit shall lapse within five years if construction has not begun by such date except for good cause but shall be renewable for successive five-year periods thereafter, provided that a written request for such renewal is made to the Planning Board at least 90 calendar days prior to said expiration and that no objection to said renewal is made and sustained based upon compliance with all conditions of the Special Permit as well as public safety factors applied at the time the Special Permit renewal is requested.

True Cannabis will apply for any other local permits required to operate a Outdoor Cultivator at the proposed location. True Cannabis will comply with all conditions and standards set forth in any local permit required to operate an Outdoor Cultivator at True Cannabis’ proposed location.

True Cannabis has already attended several meetings with various municipal officials and boards to discuss True Cannabis’ plans for a proposed Outdoor Cultivator and has executed a Host Community Agreement with Heath. True Cannabis will continue to work cooperatively with various municipal departments, boards, and officials to ensure that True Cannabis’ Outdoor Cultivator remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

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): 11/29/2021
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).

There were 16 attendees at the webinar.

The webinar recording can be found at:

<https://us02web.zoom.us/j/84561234567>
share/3W_0QtapQ95SR4PLTpMsMvN4wNBTPHviN3hUPVtM-XW1Ela-
kdk2E9ruC3F37xM.vS0wbbEspkIfEMI1 Passcode: lny6#3kT

1



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: 11/15/21
- b. Name of publication: Greenfield Recorder

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: 11/12/21

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: 11/15/2021

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:

True Cannabis, Inc.

Name of applicant's authorized representative:

Christopher Yatooma

Signature of applicant's authorized representative:

Christopher Yatooma



Link to Presentation:

https://us02web.zoom.us/rec/share/3W_0QtapQ95SR4PLTpMsMvN4wNBTPHviN3hUPVtM-XW1Ela-kdk2E9ruC3F37xM.vS0wbbEspkIfEMI1

Passcode: lny6#3kT

Number of Attendees: 16

From: BOS <BOS@townofheath.org>
Sent: Friday, December 17, 2021 11:52 AM
To: Mandy Bonny <m.bonny@vicentesederberg.com>
Subject: RE: [Town Of Heath] New Contact: m.bonny@vicentesederberg.com

Hi Mandy,

The Community Outreach Meeting for your client was held virtually on November 29th. Since it was set up and scheduled out of your office, I assume it is allowed. It would be whatever the CCC regulations state. Please refer to their website. I do think it would be covered under the modifications to the Open Meeting Law during the COVID pandemic.

Hilma

Hilma A. Sumner

Town Coordinator
Town of Heath
18 Jacobs Road
P.O. Box 35
Heath, MA 01346
(413) 337-4934, e

From: rocketfusion@webworksserver.com <rocketfusion@webworksserver.com>
Sent: Friday, December 17, 2021 11:36 AM
To: BOS <BOS@townofheath.org>
Subject: [Town Of Heath] New Contact: m.bonny@vicentesederberg.com

New contact for townofheath.org

If you want to reply to this email, make sure the To: address is
"m.bonny@vicentesederberg.com" before you click send.

email: m.bonny@vicentesederberg.com

Name: Mandy Bonny

City: Boston

State: MA

Phone: [617-207-4798](tel:617-207-4798)

Comments: Good Afternoon, I am reaching out to confirm whether an applicant can hold a Virtual Community Outreach Meeting as it relates to a Host Community Agreement. Thank you in advance for your attention to this matter. Best Mandy

LEGAL NOTICES

Legals

Commonwealth of Massachusetts
The Trial Court
Probate and Family Court
Franklin Division
INFORMAL PROBATE
FEBRUARY NOTICE
Docket No. FR210321EA
Isabel de Gloria Fumhouser
Also known As: Gloria B. Fumhouser
Date of Death: 07/30/2021
To all persons interested in the above captioned estate, by Petition of
Kathleen Kelley Manson of
Barnardston, MA
a Will has been admitted to
informal probate.
Kathleen Manson of Barnardston, MA
has been informally appointed as the
Personal Representative of the
estate to serve without
surety on the bond.
The estate is being
administered under informal
procedure by the Personal
Representative under the
Massachusetts Uniform Probate
Code without expense to the
Court. Inventory and accounts
are not required to be filed with
the Court, but interested parties
are entitled to notice regarding
the administration from the
Personal Representative and
can petition the Court in any
matter relating to the estate,
including distribution of assets
and expenses of administration.
Interested parties are entitled to
petition the Court to institute
formal proceedings and to
obtain orders terminating or
restricting the powers of
Personal Representatives
appointed under informal
procedure. A copy of the
Petition and Will, if any, can be
obtained from the Petitioner.
November 15
250088

Legals

NOTICE BY PUBLICATION
OF PETITION FOR
APPOINTMENT OF
GUARDIAN
Docket Number 210000000000
COMMONWEALTH OF
MASSACHUSETTS
Franklin/Hampshire County
Juvenile Court
43 Hope St. Ste 7
Greenfield, MA 01301-3352
TO: Unknown, Unnamed Father
of Amelia Coss DOB 12/28/2010
WHEREAS, Georgia Madd
has filed in this court a petition
seeking the appointment of a
guardian for the following minor
child(ren) with custody of said
child(ren):
Amelia R. Coss
You are hereby NOTICED that a
preliminary hearing is
scheduled in this court on the
following date and time:
12/03/2021 at 9:00 AM
You may bring an attorney with
you. If you have a right to an
attorney and if the court
determines that you are
indigent, the court will appoint
an attorney to represent you.
If you fail to appear, the court
may proceed with a hearing on
the merits of the petition and an
adjudication of this matter.
For further information call the
Office of the Clerk-Magistrate at
978-544-9125.
WITNESS, Hon. Charles S. Belsky,
First Justice,
Date Issued: 11/03/21
Kathleen K. Smoraski,
Clerk-Magistrate/Asst. Clerk
November 15
26733

Legals

NOTICE BY PUBLICATION
OF PETITION FOR
APPOINTMENT OF
GUARDIAN
Docket Number 210000000000
COMMONWEALTH OF
MASSACHUSETTS
Franklin/Hampshire County
Juvenile Court
43 Hope St. Ste 7
Greenfield, MA 01301-3352
TO: Unknown, Unnamed Father
of Amelia Coss DOB 12/28/2010
WHEREAS, Georgia Madd
has filed in this court a petition
seeking the appointment of a
guardian for the following minor
child(ren) with custody of said
child(ren):
Amelia R. Coss
You are hereby NOTICED that a
preliminary hearing is
scheduled in this court on the
following date and time:
12/03/2021 at 9:00 AM
You may bring an attorney with
you. If you have a right to an
attorney and if the court
determines that you are
indigent, the court will appoint
an attorney to represent you.
If you fail to appear, the court
may proceed with a hearing on
the merits of the petition and an
adjudication of this matter.
For further information call the
Office of the Clerk-Magistrate at
978-544-9125.
WITNESS, Hon. Charles S. Belsky,
First Justice,
Date Issued: 11/03/21
Kathleen K. Smoraski,
Clerk-Magistrate/Asst. Clerk
November 15
26733

NOTICE BY PUBLICATION
OF PETITION FOR
APPOINTMENT OF
GUARDIAN
Docket Number 210000000000
COMMONWEALTH OF
MASSACHUSETTS
Franklin/Hampshire County
Juvenile Court
43 Hope St. Ste 7
Greenfield, MA 01301-3352
TO: Unknown, Unnamed Father
of Amelia Coss DOB 12/28/2010
WHEREAS, Georgia Madd
has filed in this court a petition
seeking the appointment of a
guardian for the following minor
child(ren) with custody of said
child(ren):
Amelia R. Coss
You are hereby NOTICED that a
preliminary hearing is
scheduled in this court on the
following date and time:
12/03/2021 at 9:00 AM
You may bring an attorney with
you. If you have a right to an
attorney and if the court
determines that you are
indigent, the court will appoint
an attorney to represent you.
If you fail to appear, the court
may proceed with a hearing on
the merits of the petition and an
adjudication of this matter.
For further information call the
Office of the Clerk-Magistrate at
978-544-9125.
WITNESS, Hon. Charles S. Belsky,
First Justice,
Date Issued: 11/03/21
Kathleen K. Smoraski,
Clerk-Magistrate/Asst. Clerk
November 15
26733

NOTICE BY PUBLICATION
OF PETITION FOR
APPOINTMENT OF
GUARDIAN
Docket Number 210000000000
COMMONWEALTH OF
MASSACHUSETTS
Franklin/Hampshire County
Juvenile Court
43 Hope St. Ste 7
Greenfield, MA 01301-3352
TO: Unknown, Unnamed Father
of Amelia Coss DOB 12/28/2010
WHEREAS, Georgia Madd
has filed in this court a petition
seeking the appointment of a
guardian for the following minor
child(ren) with custody of said
child(ren):
Amelia R. Coss
You are hereby NOTICED that a
preliminary hearing is
scheduled in this court on the
following date and time:
12/03/2021 at 9:00 AM
You may bring an attorney with
you. If you have a right to an
attorney and if the court
determines that you are
indigent, the court will appoint
an attorney to represent you.
If you fail to appear, the court
may proceed with a hearing on
the merits of the petition and an
adjudication of this matter.
For further information call the
Office of the Clerk-Magistrate at
978-544-9125.
WITNESS, Hon. Charles S. Belsky,
First Justice,
Date Issued: 11/03/21
Kathleen K. Smoraski,
Clerk-Magistrate/Asst. Clerk
November 15
26733

Legals

NOTICE OF COMMUNITY OUTREACH MEETING
Notice is hereby given that
Alchemy Cannabis, Inc. will hold a
Virtual Community Outreach Meeting
on November 23 at 6:00 PM to
discuss the proposed filing of an
Adult Use Marijuana Cultivator
and Product Manufacturer at 11
Beiler Road, Heath MA.
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. 940 and
935 C.M.R. 500.000 et seq.
The Virtual Community Outreach
Meeting via Zoom is available
using the following link:
https://us02web.zoom.us/j/88227605292
or via telephone at 312-626-6799
using Webinar ID: 882 2760 5292.
A copy of the meeting presentation
will be made available at least 24
hours prior to the meeting by
emailing
rebecca@vicentesoderberg.com
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
rebecca@vicentesoderberg.com
or asked during the meeting
after the presentation.
November 15
267055

Legals

NOTICE OF COMMUNITY OUTREACH MEETING
Notice is hereby given that
Alchemy Cannabis, Inc. will hold a
Virtual Community Outreach Meeting
on November 23 at 6:00 PM to
discuss the proposed filing of an
Adult Use Marijuana Cultivator
and Product Manufacturer at 11
Beiler Road, Heath MA.
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. 940 and
935 C.M.R. 500.000 et seq.
The Virtual Community Outreach
Meeting via Zoom is available
using the following link:
https://us02web.zoom.us/j/88227605292
or via telephone at 312-626-6799
using Webinar ID: 882 2760 5292.
A copy of the meeting presentation
will be made available at least 24
hours prior to the meeting by
emailing
rebecca@vicentesoderberg.com
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
rebecca@vicentesoderberg.com
or asked during the meeting
after the presentation.
November 15
267055

Legals

NOTICE OF COMMUNITY OUTREACH MEETING
Notice is hereby given that
Alchemy Cannabis, Inc. will hold a
Virtual Community Outreach Meeting
on November 23 at 6:00 PM to
discuss the proposed filing of an
Adult Use Marijuana Cultivator
and Product Manufacturer at 11
Beiler Road, Heath MA.
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. 940 and
935 C.M.R. 500.000 et seq.
The Virtual Community Outreach
Meeting via Zoom is available
using the following link:
https://us02web.zoom.us/j/88227605292
or via telephone at 312-626-6799
using Webinar ID: 882 2760 5292.
A copy of the meeting presentation
will be made available at least 24
hours prior to the meeting by
emailing
rebecca@vicentesoderberg.com
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
rebecca@vicentesoderberg.com
or asked during the meeting
after the presentation.
November 15
267055

Legals

NOTICE OF COMMUNITY OUTREACH MEETING
Notice is hereby given that
Alchemy Cannabis, Inc. will hold a
Virtual Community Outreach Meeting
on November 23 at 6:00 PM to
discuss the proposed filing of an
Adult Use Marijuana Cultivator
and Product Manufacturer at 11
Beiler Road, Heath MA.
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. 940 and
935 C.M.R. 500.000 et seq.
The Virtual Community Outreach
Meeting via Zoom is available
using the following link:
https://us02web.zoom.us/j/88227605292
or via telephone at 312-626-6799
using Webinar ID: 882 2760 5292.
A copy of the meeting presentation
will be made available at least 24
hours prior to the meeting by
emailing
rebecca@vicentesoderberg.com
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
rebecca@vicentesoderberg.com
or asked during the meeting
after the presentation.
November 15
267055

Legals

NOTICE OF COMMUNITY OUTREACH MEETING
Notice is hereby given that
Alchemy Cannabis, Inc. will hold a
Virtual Community Outreach Meeting
on November 23 at 6:00 PM to
discuss the proposed filing of an
Adult Use Marijuana Cultivator
and Product Manufacturer at 11
Beiler Road, Heath MA.
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. 940 and
935 C.M.R. 500.000 et seq.
The Virtual Community Outreach
Meeting via Zoom is available
using the following link:
https://us02web.zoom.us/j/88227605292
or via telephone at 312-626-6799
using Webinar ID: 882 2760 5292.
A copy of the meeting presentation
will be made available at least 24
hours prior to the meeting by
emailing
rebecca@vicentesoderberg.com
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
rebecca@vicentesoderberg.com
or asked during the meeting
after the presentation.
November 15
267055

Legals

PUBLIC NOTICE
TAX CLASSIFICATION HEARING
TOWN OF CHARLEMONT
In accordance with Chapter 589
of the Acts of 1982, the
Charlmon Select Board will
hold a public hearing on the
issue of determining a single or
multiple tax rate for the Town of
Charlmon. Said hearing will be
held on Monday, November 22,
2021 at 6:00 PM in the Goodnow
Town Hall, 157 Main Street,
Charlmon. To attend this
hearing, visit telephonic
conference call 1-426-439-6303
with access code: 240482#
Charlmon Board of Selectmen
Margaret Wilk, Chair
Daniel O'Neil
November 15
256919

Legals

LEGAL NOTICE
ATHOL CONSERVATION
COMMISSION
The Athol Conservation
Commission will hold a public
meeting on a Request for a
Determination of Applicability
submitted by Athol Hospital,
2033 Main Street, Athol, MA, to
remove approximately 30 trees
and brush encroaching on the
Helped Fight path. All debris will
be chipped and removed. Map
38, lot 106, in Athol, MA. The
hearing is in accordance with the
Massachusetts Probate Act and
310 CMR 10.05(5). The meeting
will be held on Tuesday,
November 16, 2021 at 6:00 PM in
the Conservation Commission
Office (Memorial Hall), Memorial
Building, 584 Main Street, Athol,
MA. You must wear a mask and
keep the 6-foot social distance
requirement. Limited to 20
persons at any one time.
November 15
262450

Legals

CARE AND PROTECTION,
TERMINATION OF
PARENTAL RIGHTS,
SUMMONS BY PUBLICATION,
DOCKET NUMBER: 21CP00202F,
Trial Court of Massachusetts,
Juvenile Court Department,
COMMONWEALTH OF
MASSACHUSETTS,
Franklin/Hampshire
County Juvenile Court,
43 Hope Street,
Greenfield, MA 01301
TO: Father of Karler
Michael O'Malley born on
March 18, 2019 to Mariah
O'Malley. A petition has been
submitted to this court by DCF
Greenfield Office, seeking as to
the following child: Karler
O'Malley, that said child be
found in need of care and
protection and committed to
the Department of Children and
Families. The court may
dispena the rights of the
parent(s) named herein to
receive notice of or to consent
to any legal proceeding
relating to the adoption, custody
or guardianship or any other
disposition of the child named
herein, if it finds that the child is
in need of care and protection
and that the best interests of
the child would be served by
said disposition.
You are hereby ORDERED to
appear in this court, at the
court address set forth above,
on the following date and time:
12/13/2021 at 9:30 AM
Permanency Hearing
You may bring an attorney with
you. If you have a right to an
attorney and if the court
determines that you are
indigent, the court will appoint
an attorney to represent you.
If you fail to appear, the court
may proceed on that date and
any date thereafter with a trial
on the merits of the petition and
an adjudication of this matter.
For further information call the
Office of the Clerk-Magistrate at
(413) 748-7747.
****Please call the Clerk's Office**
at 413-776-0014 for further
information. DO NOT REPORT IN
PERSON.
WITNESS, Hon. Charles S. Belsky,
First Justice,
DATE ISSUED: 10/27/2021
Kathleen K. Smoraski,
Assistant Clerk-Magistrate
November 5, 8, 15
249881

CARE AND PROTECTION,
TERMINATION OF
PARENTAL RIGHTS,
SUMMONS BY PUBLICATION,
DOCKET NUMBER: 21CP00202F,
Trial Court of Massachusetts,
Juvenile Court Department,
COMMONWEALTH OF
MASSACHUSETTS,
Franklin/Hampshire
County Juvenile Court,
43 Hope Street,
Greenfield, MA 01301
TO: Father of Karler
Michael O'Malley born on
March 18, 2019 to Mariah
O'Malley. A petition has been
submitted to this court by DCF
Greenfield Office, seeking as to
the following child: Karler
O'Malley, that said child be
found in need of care and
protection and committed to
the Department of Children and
Families. The court may
dispena the rights of the
parent(s) named herein to
receive notice of or to consent
to any legal proceeding
relating to the adoption, custody
or guardianship or any other
disposition of the child named
herein, if it finds that the child is
in need of care and protection
and that the best interests of
the child would be served by
said disposition.
You are hereby ORDERED to
appear in this court, at the
court address set forth above,
on the following date and time:
12/13/2021 at 9:30 AM
Permanency Hearing
You may bring an attorney with
you. If you have a right to an
attorney and if the court
determines that you are
indigent, the court will appoint
an attorney to represent you.
If you fail to appear, the court
may proceed on that date and
any date thereafter with a trial
on the merits of the petition and
an adjudication of this matter.
For further information call the
Office of the Clerk-Magistrate at
(413) 748-7747.
****Please call the Clerk's Office**
at 413-776-0014 for further
information. DO NOT REPORT IN
PERSON.
WITNESS, Hon. Charles S. Belsky,
First Justice,
DATE ISSUED: 10/27/2021
Kathleen K. Smoraski,
Assistant Clerk-Magistrate
November 5, 8, 15
249881

CARE AND PROTECTION,
TERMINATION OF
PARENTAL RIGHTS,
SUMMONS BY PUBLICATION,
DOCKET NUMBER: 21CP00202F,
Trial Court of Massachusetts,
Juvenile Court Department,
COMMONWEALTH OF
MASSACHUSETTS,
Franklin/Hampshire
County Juvenile Court,
43 Hope Street,
Greenfield, MA 01301
TO: Father of Karler
Michael O'Malley born on
March 18, 2019 to Mariah
O'Malley. A petition has been
submitted to this court by DCF
Greenfield Office, seeking as to
the following child: Karler
O'Malley, that said child be
found in need of care and
protection and committed to
the Department of Children and
Families. The court may
dispena the rights of the
parent(s) named herein to
receive notice of or to consent
to any legal proceeding
relating to the adoption, custody
or guardianship or any other
disposition of the child named
herein, if it finds that the child is
in need of care and protection
and that the best interests of
the child would be served by
said disposition.
You are hereby ORDERED to
appear in this court, at the
court address set forth above,
on the following date and time:
12/13/2021 at 9:30 AM
Permanency Hearing
You may bring an attorney with
you. If you have a right to an
attorney and if the court
determines that you are
indigent, the court will appoint
an attorney to represent you.
If you fail to appear, the court
may proceed on that date and
any date thereafter with a trial
on the merits of the petition and
an adjudication of this matter.
For further information call the
Office of the Clerk-Magistrate at
(413) 748-7747.
****Please call the Clerk's Office**
at 413-776-0014 for further
information. DO NOT REPORT IN
PERSON.
WITNESS, Hon. Charles S. Belsky,
First Justice,
DATE ISSUED: 10/27/2021
Kathleen K. Smoraski,
Assistant Clerk-Magistrate
November 5, 8, 15
249881

CARE AND PROTECTION,
TERMINATION OF
PARENTAL RIGHTS,
SUMMONS BY PUBLICATION,
DOCKET NUMBER: 21CP00202F,
Trial Court of Massachusetts,
Juvenile Court Department,
COMMONWEALTH OF
MASSACHUSETTS,
Franklin/Hampshire
County Juvenile Court,
43 Hope Street,
Greenfield, MA 01301
TO: Father of Karler
Michael O'Malley born on
March 18, 2019 to Mariah
O'Malley. A petition has been
submitted to this court by DCF
Greenfield Office, seeking as to
the following child: Karler
O'Malley, that said child be
found in need of care and
protection and committed to
the Department of Children and
Families. The court may
dispena the rights of the
parent(s) named herein to
receive notice of or to consent
to any legal proceeding
relating to the adoption, custody
or guardianship or any other
disposition of the child named
herein, if it finds that the child is
in need of care and protection
and that the best interests of
the child would be served by
said disposition.
You are hereby ORDERED to
appear in this court, at the
court address set forth above,
on the following date and time:
12/13/2021 at 9:30 AM
Permanency Hearing
You may bring an attorney with
you. If you have a right to an
attorney and if the court
determines that you are
indigent, the court will appoint
an attorney to represent you.
If you fail to appear, the court
may proceed on that date and
any date thereafter with a trial
on the merits of the petition and
an adjudication of this matter.
For further information call the
Office of the Clerk-Magistrate at
(413) 748-7747.
****Please call the Clerk's Office**
at 413-776-0014 for further
information. DO NOT REPORT IN
PERSON.
WITNESS, Hon. Charles S. Belsky,
First Justice,
DATE ISSUED: 10/27/2021
Kathleen K. Smoraski,
Assistant Clerk-Magistrate
November 5, 8, 15

NOTICE OF COMMUNITY OUTREACH MEETING

Notice is hereby given that True Cannabis, Inc. will hold a Virtual Community Outreach Meeting on November 29 at 6:00 PM to discuss the proposed siting of an Adult Use Marijuana Cultivator and Product Manufacturer at 11 Bellor Road, Heath MA.

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.

The Virtual Community Outreach Meeting via Zoom is available using the following link: <https://us02web.zoom.us/j/88227505292> or via telephone at 312-626-6799 using Webinar ID: 882 2750 5292. A copy of the meeting presentation will be made available at least 24 hours prior to the meeting by request by emailing rebecca@vicentesederberg.com.

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 rebecca@vicentesederberg.com or asked during the meeting after the presentation.

From: Bridgette Nikisher <b.nikisher@vicentesederberg.com>
Sent: Friday, November 12, 2021 11:11 AM
To: BOS <BOS@townofheath.org>; Town Clerk <TownClerk@townofheath.org>
Subject: Notice of Public Meeting

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

*Paralegal
She/Her/Hers*

Vicente Sederberg LLP

1115 Broadway, 12th Floor
New York, NY 10010
Direct: 917-398-0685
Main: 917-338-5455
b.nikisher@vicentesederberg.com
VicenteSederberg.com
[Confidentiality Notice](#)



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

NOTICE OF COMMUNITY OUTREACH MEETING

Notice is hereby given that True Cannabis, Inc. will hold a Virtual Community Outreach Meeting on November 29 at 6:00 PM to discuss the proposed siting of an Adult Use Marijuana Cultivator and Product Manufacturer at 11 Bellor Road, Heath MA.

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.

The Virtual Community Outreach Meeting via Zoom is available using the following link: <https://us02web.zoom.us/j/88227505292> or via telephone at 312-626-6799 using Webinar ID: 882 2750 5292. A copy of the meeting presentation will be made available at least 24 hours prior to the meeting by request by emailing rebecca@vicentesederberg.com.

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 rebecca@vicentesederberg.com or asked during the meeting after the presentation.

7020 3160 0002 2726 5997

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee
 \$

Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage
 \$

Total Postage and
 \$

Sent To
 [REDACTED]

Street and Apt. No.
 43 UNDERWOOD HILL RD
 COLRAIN, MA 01340

City, State, ZIP+4
 [REDACTED]

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7020 3160 0002 2727 0410

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee
 \$

Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage
 \$

Total Postage and
 \$

Sent To
 [REDACTED]

Street and Apt. No.
 23 BELLOR RD
 CHARLEMONT, MA 01339

City, State, ZIP+4
 [REDACTED]

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7020 3160 0002 2727 0397

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee
 \$

Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage
 \$

Total Postage
 \$

Sent To
 [REDACTED]

Street and Apt. No.
 15 GROVE ST
 GREENFIELD, MA 01301-2325

City, State, ZIP+4
 [REDACTED]

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7020 3160 0002 2727 0403

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee
 \$

Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage
 \$

Total Postage
 \$

Sent To
 [REDACTED]

Street and Apt. No.
 PO BOX 4
 COLRAIN, MA 01340

City, State, ZIP+4
 [REDACTED]

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7020 3160 0002 2727 0373

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee \$
 Extra Services & Fees (check box, add fee as appropriate):
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage \$
 Total Postage \$

Sent To [REDACTED]
 Street and Apt. 635 BRADLEY ST
 City, State, ZIP+4® EAST HAVEN, CT 06512

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7020 3160 0002 2726 6000

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee \$
 Extra Services & Fees (check box, add fee as appropriate):
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage \$
 Total Postage \$

Sent To [REDACTED]
 Street and Apt. 637 CONCORD RD
 City, State, ZIP+4® SUDBURY, MA 01776

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7020 3160 0002 2727 0360

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee \$
 Extra Services & Fees (check box, add fee as appropriate):
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage \$
 Total Postage \$

Sent To [REDACTED]
 Street and Apt. 4343 VT ROUTE 112
 City, State, ZIP+4® JACKSONVILLE, VT 05342-9787

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

ATTESTATION REGARDING COMMUNITY OUTREACH MEETING

I, Philip C. Silverman, Esq., Counsel for the True Cannabis, Inc. ("True Cannabis") hereby certify and attest to the following:

1. On February 5, 2022, I corresponded with Hilma Sumner, the Town Coordinator of the Town of Heath, Massachusetts, on behalf of True Cannabis.
2. Ms. Sumner confirmed that True Cannabis' prior Community Outreach Meeting (held on November 29, 2021) was sufficient to meet the Town's requirements and as notice to abutters and interested parties.
3. Ms. Sumner also confirmed that a new Community Outreach Meeting would not need to be held by True Cannabis.



Name: Philip C. Silverman, Esq.
Title: Counsel for True Cannabis, Inc.

February 7, 2022

Date

THE TRUE CANNABIS PLAN TO ENHANCE AND PROVIDE FOR AREAS OF DISPROPORTIONATE IMPACT

In order for True Cannabis to positively impact Massachusetts residents who have past drug convictions, True Cannabis has established the following goals:

- Reduce barriers to entry in the commercial adult-use cannabis industry by having 20% of True Cannabis' staff be individuals with drug-related CORI that are otherwise legally employable in a cannabis-related business; and
- Provide business assets toward endeavors that will have a positive impact towards the promotion of social and economic reparations to those persons with past drug convictions by donating \$5,000, annually, to Community Legal Aid - Pittsfield.

Planned Programs

True Cannabis has developed specific programs to effectuate its stated goals to positively impact Massachusetts residents who have past drug convictions. Such programs will include the following:

- True Cannabis will recruit individuals with drug-related CORI by posting job opportunities until its initial hiring needs are met and then as needed on jobsforfelonsonline.com.
- True Cannabis will donate \$5,000, annually, to Community Legal Aid – Pittsfield for the purpose of providing free legal services for record expungement to Massachusetts residents.

Measurable Outcomes

The Community Engagement Officer will administer the Plan and will be responsible for developing measurable outcomes to ensure True Cannabis continues to meet its commitments. Such measurable outcomes, in accordance with True Cannabis' goals and programs described above, include:

- *The number of employees hired with drug-related CORI.*

- The applicant will count the number of employees hired with drug-related CORI, determine what percentage of the applicant's workforce these individuals make up and compare it to its goal of 20%.
- *The amount of funds donated on an annual basis to Community Legal Aid – Pittsfield.*
 - The applicant will determine the total amount of funds donated to Community Legal Aid – Pittsfield on an annual basis and compare it to its goal of \$5,000.

Beginning upon receipt of True Cannabis' first Provisional License from the Commission to operate a marijuana establishment in the Commonwealth, True Cannabis will utilize the 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. The Community Engagement Officer will review and evaluate True Cannabis' measurable outcomes no less than twice annually to ensure that True Cannabis is meeting its commitments. True Cannabis is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

Acknowledgements

- True Cannabis 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 True Cannabis will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$250.00

Secretary of the Commonwealth, Corporations Division
 One Ashburton Place, 17th floor
 Boston, MA 02108-1512
 Telephone: (617) 727-9640

Articles of Organization

(General Laws, Chapter 156D, Section 2.02; 950 CMR 113.16)

Identification Number: 001541134

ARTICLE I

The exact name of the corporation is:

TRUE CANNABIS, INC.

ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. C156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:

APPLYING FOR A LICENSE WITH THE CANNABIS CONTROL COMMISSION.

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.

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		<i>Num of Shares</i>	<i>Total Par Value</i>	
CWP	\$0.01000	100	\$1.00	0

G.L. C156D eliminates the concept of par value, however a corporation may specify par value in Article III. See G.L. C156D Section 6.21 and the comments thereto.

ARTICLE IV

If more than one class of stock is authorized, state a distinguishing designation for each class. Prior to the issuance of any shares of a class, if shares of another class are outstanding, the Business Entity must provide a description of the preferences, voting powers, qualifications, and special or relative rights or privileges of that class and of each other class of which shares are outstanding and of each series then established within any class.

ARTICLE V

The restrictions, if any, imposed by the Articles of Organization upon the transfer of shares of stock of any class are:

ARTICLE VI

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

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 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.

Later Effective Date: Time:

ARTICLE VIII

The information contained in Article VIII is not a permanent part of the Articles of Organization.

a,b. The street address of the initial registered office of the corporation in the commonwealth and the name of the initial registered agent at the registered office:

Name: INCorp SERVICES, INC.
No. and Street: 44 SCHOOL STREET, STE. 505
City or Town: BOSTON State: MA Zip: 82001 Country: USA

c. The names and street 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):

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	CHRISTOPER YATOOMA	1615 S TELEGRAPH RD BLOOMFIELD HILLS, MI 48302 USA
TREASURER	CHRISTOPER YATOOMA	1615 S TELEGRAPH RD BLOOMFIELD HILLS, MI 48302 USA
SECRETARY	CHRISTOPER YATOOMA	1615 S TELEGRAPH RD BLOOMFIELD HILLS, MI 48302 USA
DIRECTOR	CHRISTOPER YATOOMA	1615 S TELEGRAPH RD BLOOMFIELD HILLS, MI 48302 USA

d. The fiscal year end (i.e., tax year) of the corporation:

January

e. A brief description of the type of business in which the corporation intends to engage:

OBTAINING A LICENSE WITH THE CANNABIS CONTROL COMM

f. The street address (post office boxes are not acceptable) of the principal office of the corporation:

No. and Street: 1615 S TELEGRAPH RD. STE. 300
City or Town: BLOOMFIELD HILLS State: MI Zip: 48302 Country: USA

g. Street address where the records of the corporation required to be kept in the Commonwealth are located (post office boxes are not acceptable):

No. and Street: 44 SCHOOL STREET, STE. 505
City or Town: BOSTON State: MA Zip: 82001 Country: USA
which is
☐ its principal office ☐ an office of its transfer agent
☐ an office of its secretary/assistant secretary ☒ its registered office

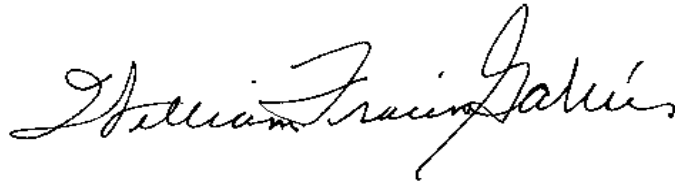
Signed this 29 Day of October, 2021 at 4:29:32 PM by the incorporator(s). *(If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)*

CHRISTOPHER YATOOMA

THE COMMONWEALTH OF MASSACHUSETTS

I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are deemed to have been filed with me on:

October 29, 2021 04:28 PM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive, flowing style with a large initial 'W' and 'G'.

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

**Certificate of Good Standing or Compliance from the Massachusetts
Department of Unemployment Assistance Attestation Form**

Signed under the pains and penalties of perjury, I, Christopher Yatooma, an authorized representative of True Cannabis, Inc., certify that True Cannabis, Inc. does not currently have employees and is therefore unable to register with the Massachusetts Department of Unemployment Assistance to obtain a Certificate of Good Standing or Compliance.

Christopher Yatooma
Signature

12/2/21
Date

Name: Christopher Yatooma

Title: President

Entity: True Cannabis, Inc.



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

William Francis Galvin
Secretary of the
Commonwealth

Date: November 22, 2021

To Whom It May Concern :

I hereby certify that according to the records of this office,
TRUE CANNABIS, INC.

is a domestic corporation organized on **October 29, 2021** , 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: 21110550160

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

Processed by: ili

BYLAWS
OF
True Cannabis, Inc.
A Massachusetts Profit Corporation

ARTICLE I
OFFICES

Section 1. Registered Office. The registered office of the Corporation shall be as specified in the Articles of Incorporation or such other place as determined by the Board of Directors. The Corporation shall keep records containing the names and addresses of all shareholders, the number, class and series of shares held by each, and the dates when they respectively became holders of record thereof, at its registered office or at the office of its transfer agent.

Section 2. Other Offices. The business of the Corporation may be transacted in such locations other than the registered office, within or outside the State of Massachusetts, as the Board of Directors may from time to time determine, or as the business of the Corporation may require.

ARTICLE II
CAPITAL STOCK

Section 1. Stock Certificates. Certificates representing shares of the Corporation shall be in such form as is approved by the Board of Directors. Certificates shall be signed by the chairman of the Board of Directors, vice chairman of the Board of Directors, president or a vice president.

Section 2. Replacement of Lost or Destroyed Certificates. If a stock certificate is lost or destroyed, no new certificate shall be issued in place thereof until the Corporation has received from the registered holder such assurances, representations, warranties and/or guarantees as the Board of Directors, in its sole discretion, shall deem advisable, and until the Corporation receives sufficient indemnification protecting it against any claim that may be made on account of such lost or destroyed certificate, or the issuance of any new certificate in place thereof, including an indemnity bond in such amount and with sureties, if any, as the Board of Directors, in its sole discretion, deems advisable.

Section 3. Transfer of Shares. Shares of stock of the Corporation shall be transferable only upon the books of the Corporation. The old certificates shall be surrendered to the Corporation by delivery thereof to the person in charge of the stock transfer books of the Corporation or to such other person as the Board of Directors may designate, properly endorsed for transfer, and such certificates shall be canceled before a new certificate is issued. The Corporation shall be entitled to treat the person in whose name any share, right or option is registered as the owner thereof for all purposes, and shall not be bound to recognize any equitable or other claim with respect thereto,

regardless of any notice thereof, except as may be specifically required by the laws of the State of Massachusetts.

Section 4. Rules Governing Stock Certificates. The Board of Directors shall have the power and authority to make all such rules and regulations as they may deem expedient concerning the issue, transfer and registration of certificates of stock, and may appoint a transfer agent and/or a registrar of transfer, and may require all such certificates to bear the signature of such transfer agent and/or of such registrar of transfers.

Section 5. Record Date for Share Dividends, Distributions and Other Actions. For the purpose of determining shareholders entitled to receive payment of a share dividend or distribution, or allotment of a right, or for the purpose of any other action, the Board of Directors may fix a record date which shall not precede the date on which the resolution fixing the record date is adopted by the Board. The date shall not be more than sixty (60) days before the payment of the share dividend or distribution or allotment of a right or other action. If a record date is not fixed, the record date shall be the close of business on the day on which the resolution of the Board relating to the corporate action is adopted.

Section 6. Dividends. The Board of Directors, in its discretion, may from time to time declare and direct payment of dividends or other distributions upon the Corporation's outstanding shares. Dividends may be paid in money or other property, subject to the limitations of the Massachusetts Business Corporation Act.

Section 7. Acquisition of Shares. Subject to the limitations of the Massachusetts Business Corporation Act, the Board of Directors may authorize the Corporation to acquire its own shares, and shares so acquired shall constitute authorized but unissued shares, except that shares of the Corporation acquired by it may be pledged as security for the payment of the purchase price of the shares and, until the purchase price is paid by the Corporation, such shares are not canceled and do not constitute authorized but unissued shares. In such event, the acquired and pledged shares shall not be voted directly or indirectly at any meeting or otherwise, shall not be counted in determining the total number of issued shares entitled to vote at any given time, and, upon payment of the purchase price, are canceled and constitute authorized but unissued shares.

Section 8. Redemption of Control Shares. Control shares acquired in a control share acquisition, with respect to which no acquiring person statement has been filed with the Corporation, shall, at any time during the period ending sixty (60) days after the last acquisition of control shares or the power to direct the exercise of voting power of control shares by the acquiring person, be subject to redemption by the Corporation. After an acquiring person statement has been filed with the Corporation and after the meeting at which the voting rights of the control shares acquired in a control share acquisition are submitted to the shareholders, the shares shall be subject to redemption by the Corporation unless the shares are accorded full voting rights by the shareholders as provided in Section 798 of the Massachusetts Business Corporation Act. Redemptions of shares pursuant to this bylaw shall be at the fair value of the shares pursuant to procedures adopted by the Board of Directors of the Corporation. The terms "control shares," "control share acquisition/ "acquiring person statement," "acquiring person," and "fair value," as

used in this bylaw, shall have the meanings ascribed to them in the Massachusetts Business Corporation Act.

ARTICLE III SHAREHOLDERS

Section 1. Place of Meetings. Meetings of shareholders shall be held at the registered office of the Corporation or at such other place, within or outside the State of Massachusetts, as may be determined from time to time by the Board of Directors, provided however, if a meeting of shareholders is to be held at a place other than the registered office of the Corporation, the notice of the meeting shall designate such place.

Section 2. Annual Meeting. Annual meetings of shareholders for election of directors and for such other business as may come before the meeting shall be held at a date designated by the Board of Directors.

Section 3. Special Meetings. Special meetings of shareholders may be called by the chairman or vice chairman of the Board, the president or the secretary and shall be called by one of them or upon receipt by them of a request in writing stating the purpose or purposes thereof and signed by any three directors.

Section 4. Record Date for Notice and Vote. For the purpose of determining shareholders entitled to notice of and to vote at a meeting of shareholders or an adjournment of a meeting, the Board of Directors may fix a record date which shall not precede the date on which the resolution fixing the record date is adopted by the Board. The date shall be not more than sixty (60) nor less than ten (10) days before the date of the meeting. If a record date is not fixed, the record date for determination of shareholders entitled to notice of or to vote at a meeting of shareholders shall be the close of business on the day next preceding the day on which notice is given or, if no notice is given, the day next preceding the day on which the meeting is held. When a determination of shareholders of record entitled to notice of or to vote at a meeting of shareholders has been made as provided in this Section 4, the determination applies to any adjournment of the meeting, unless the Board fixes a new record date under this section for the adjourned meeting.

For the purpose of determining shareholders entitled to express consent to or to dissent from a proposal without a meeting, the Board of Directors may fix a record date which shall not precede the date on which the resolution fixing the record date is adopted by the Board and shall be not more than ten (10) days after the Board resolution. If a record date is not fixed and prior action by the Board is required with respect to the corporate action to be taken without a meeting, the record date shall be the close of business on the day on which the resolution of the Board is adopted. If a record date is not fixed and prior action by the Board is not required, the record date shall be the first date on which a signed written consent is delivered to the Corporation as provided in Section 407 of the Massachusetts Business Corporation Act.

Section 5. Notice of Shareholder Meetings. Written notice of the time, place and purposes of any meeting of shareholders shall be given not less than ten (10) nor more than sixty (60) days before the date of the meeting to each shareholder of record entitled to vote at the meeting. Such

notice may be given either by delivery in person to such shareholders or by mailing such notice to shareholders at their addresses as the same appear on the stock books of the Corporation. A shareholder's attendance at a meeting, in person or by proxy, constitutes a waiver of the shareholder's objection to lack of notice or defective notice of the meeting unless, at the beginning of the meeting, the shareholder objects to holding the meeting or transacting business at the meeting, and constitutes a waiver of the shareholder's objection to consideration of a particular matter at the meeting that is not within the purpose or purposes described in the meeting notice, unless the shareholder objects to considering the matter when it is presented.

Section 6. Voting Lists. The Corporation's officer or agent having charge of its stock transfer books shall prepare and certify a complete list of the shareholders entitled to vote at a shareholders' meeting or any adjournment thereof, which list shall be arranged alphabetically within each class and series, and shall show the address of and number of shares held by each shareholder. The list shall be produced at the time and place of the meeting of shareholders and be subject to inspection by any shareholder at any time during the meeting. The list shall be prima facie evidence as to who are the shareholders entitled to examine the list or to vote at the meeting. If for any reason the requirements with respect to the shareholder list specified in this Section 6 of Article III have not been complied with, any shareholder, either in person or by proxy, who in good faith challenges the existence of sufficient votes to carry any action at the meeting, may demand that the meeting be adjourned and the same shall be adjourned until the requirements are complied with, provided however, that failure to comply with such requirements does not affect the validity of any action taken at the meeting before such demand is made.

Section 7. Voting. Except as may otherwise be provided in the Articles of Incorporation or bylaws of the Corporation, each shareholder entitled to vote at a meeting of shareholders, or to express consent or dissent without a meeting, shall be entitled to one (1) vote, in person or by proxy, for each share of stock entitled to vote held by such shareholder, provided however, no proxy shall be voted after three (3) years from its date unless such proxy provides for a longer period. A vote may be cast either orally or in writing as announced or directed by the chairperson of the meeting prior to the taking of the vote. When an action other than the election of directors is to be taken by vote of the shareholders, it shall be authorized by a majority of the votes cast by the holders of shares entitled to vote thereon, unless a greater vote is required by express requirement of the Massachusetts Business Corporation Act or of the Articles of incorporation, in which case such express provision shall govern and control the decision of such question. Except as otherwise expressly required by the Articles of Incorporation, directors shall be elected by a plurality of the votes cast at an election.

Section 8. Quorum. Except as may otherwise be provided in the Articles of Incorporation, shares entitled to cast a majority of the votes at a meeting constitute a quorum. Meetings at which less than a quorum is represented may be adjourned by a vote of a majority of the shares present to a further date without further notice other than the announcement at such meeting, and, when the quorum shall be present upon such adjourned date, any business may be transacted which might have been transacted at the meeting as originally called. Shareholders present in person or by proxy at any meeting of shareholders may continue to do business until adjournment, notwithstanding the withdrawal of enough shareholders to leave less than a quorum.

Section 9. Conduct of Meetings. The chairman of the Board of Directors or the chairman's designee shall call meetings of the shareholders to order and shall act as chairman of such meetings. The secretary of the Corporation shall act as secretary of all meetings of shareholders but, in the absence of the secretary at any meeting of shareholders or the secretary's inability or election not to act as secretary, the presiding officer may appoint any person to act as secretary of the meeting.

Section 10. Inspector of Elections. The Board of Directors may, in advance of a meeting of shareholders, appoint one or more inspectors to act at the meeting or any adjournment thereof. If inspectors are not so appointed, or an appointed inspector fails to appear or act, the person presiding at the meeting of shareholders may and, on request of a shareholder entitled to vote thereat, shall appoint one or more persons to fill such vacancy or vacancies, or to act as inspector. The inspector(s) shall determine the number of shares outstanding and the voting power of each, the shares represented at the meeting, the existence of a quorum, the validity and effect of proxies, and shall receive votes, ballots or consents, hear and determine challenges and questions arising in connection with the right to vote, count and tabulate votes, ballots or consents, determine the results, and do such acts as are proper to conduct the election or vote with fairness to all shareholders.

Section 11. Notification of Nominations. Nominations for the election of directors may be made by the Board of Directors or by a shareholder entitled to vote in the election of directors. A shareholder entitled to vote in the election of directors, however, may make such a nomination only if written notice of such shareholder's intent to do so has been given, either by personal delivery or by United States mail, postage prepaid, and received by the Corporation (a) with respect to an election to be held at an annual meeting of shareholders, not later than sixty (60) days in advance of the date of such meeting, and (b) with respect to an election to be held at a special meeting of shareholders called for that purpose, not later than the close of business on the tenth (10th) day following the date on which notice of the special meeting was first mailed to the shareholders by the Corporation.

Each shareholder's notice of intent to make a nomination shall set forth:

- (a) the names and addresses of the shareholder who intends to make the nomination and of the person or persons to be nominated;
- (b) a representation that the shareholder (i) is a holder of record of stock of the Corporation entitled to vote at such meeting, (ii) will continue to hold such stock through the date on which the meeting is held, and (iii) intends to appear in person or by proxy at the meeting to nominate the person or persons specified in the notice;
- (c) a description of all arrangements or understandings between the shareholder and each nominee and any other person or persons (naming such person or persons) pursuant to which the nomination is to be made by the shareholder;
- (d) such other information regarding each nominee proposed by such shareholder as would be required to be included in a proxy statement filed pursuant to the proxy rules of the

Securities and Exchange Commission had the nominee been nominated by the Board of Directors; and

(e) the consent of each nominee to serve as a director of the Corporation if so elected.

The chairman of the meeting may refuse to acknowledge the nomination of any person nominated by a shareholder whose nomination is not made in compliance with the foregoing procedure.

Section 12. Notification of Other Shareholder Proposals. The Board of Directors of the Corporation shall submit for consideration and vote by the shareholders, at any meeting of the shareholders, only those proposals that are first brought before the meeting by or at the direction of the Board of Directors, or by any shareholder entitled to vote at such meeting (a) who submits to the Corporation a timely Notice of Proposal in accordance with the requirements of this Section 12 and the proposal is a proper subject for action by shareholders under Massachusetts law, or (b) whose proposal is included in the Corporation's proxy materials in compliance with all the requirements set forth in the applicable rules and regulations in the Securities and Exchange Commission.

Each shareholder's Notice of Proposal shall set forth:

- (a) The name and address of the shareholder submitting the proposal, as they appear on the Corporation's books and records;
- (b) A representation that the shareholder (i) is a holder of record of stock of the Corporation entitled to vote at such meeting, (ii) will continue to hold such stock through the date on which the meeting is held, and (iii) intends to appear in person or by proxy at the meeting to submit the proposal for shareholder vote;
- (c) A brief description of the proposal desired to be submitted to the meeting for shareholder vote and the reasons for conducting such business at the meeting; and
- (d) A description of any financial or other interest of such shareholder in the proposal.

A Notice of Proposal must be given, either by personal delivery or by United States mail, postage prepaid, and received by the Corporation not less than thirty (30) days prior to the date of the originally scheduled meeting, regardless of any adjournments thereof to a later date; provided that, if less than forty (40) days' notice of the shareholder meeting is given by the Corporation, the Notice of Proposal must be received by the Corporation not later than the close of business on the tenth (10th) day following the date on which the notice of the scheduled meeting was first mailed to the shareholders.

The secretary of the Corporation shall notify a shareholder in writing whether his or her Notice of Proposal has been made in accordance with all the requirements of this Section 12. The chairman of the meeting may refuse to acknowledge the proposal of any shareholder not made in compliance with all such requirements.

ARTICLE IV DIRECTORS

Section 1. Authority and Size of Board. The business and affairs of the Corporation shall be managed by the Board of Directors. The number of directors of the Corporation that shall constitute the Board of Directors shall be at least one (1) but no more than five (5), unless otherwise determined from time to time by resolution adopted by the affirmative vote of at least eighty percent (80%) of the Board of Directors.

Section 2. Classification of Board and Filling of Vacancies. The directors shall be divided into two (2) classes, each class to be as nearly equal in number as possible. The directors of the first class shall hold office until the annual meeting of stockholders in even numbered years and until their respective successors are duly elected and qualified or their resignation or removal. The directors of the second class shall hold office until the annual meeting of stockholders in odd numbered years and until their respective successors are duly elected and qualified or their resignation or removal. Any vacancies in the Board of Directors for any reason, and any newly created directorships resulting from any increase in the number of directors, may be filled only by the Board of Directors, acting by vote of a majority of the Continuing Directors and at least eighty percent (80%) of the Board of Directors, and any directors so chosen shall hold office until the next annual meeting of stockholders and until their respective successors shall be duly elected and qualified or their resignation or removal. No decrease in the number of directors shall shorten the term of any incumbent director.

Section 3. Resignation and Removal of Directors. A director may resign by written notice to the Corporation, which resignation is effective upon its receipt by the Corporation or at a subsequent time as set forth in the written notice of resignation. Notwithstanding any other provisions of the Articles of Incorporation or the Bylaws of the Corporation, any one or more directors of the Corporation may be removed at any time, with or without cause, but only by either (a) the affirmative vote of a 80% of the Board of Directors, or (b) the affirmative vote, at a meeting of the stockholders called for that purpose, of the holders of at least eighty percent (80%) of the voting power of the then outstanding shares of capital stock of the Corporation entitled to vote generally in the election of directors voting together as a single class.

Section 4. Place of Meetings and Records. The directors shall hold their meetings and maintain the minutes of the proceedings of meetings of shareholders, Board of Directors, and committees, if any, and keep the books and records of account for the Corporation in such place or places, within or outside the State of Massachusetts, as the Board may from time to time determine.

Section 5. Annual Meetings of Directors. The newly elected directors shall hold their first meeting, without notice other than this bylaw, at the same place and immediately after the annual meeting of the shareholders at which they are elected, or the time and place of such meeting may be fixed by consent in writing of all the directors.

Section 6. Regular Meetings of the Board. Regular meetings of the Board of Directors may be held without notice at such time and at such place as shall from time to time be determined

by the Board or by the chairman or vice chairman of the Board of Directors, or the president. Any notice given of a regular meeting need not specify the business to be transacted or the purpose of the meeting.

Section 7. Special Meetings of the Board. Special meetings of the Board may be called by the chairman or vice chairman of the Board of Directors or the president on at least two (2) days' notice to each director by mail or overnight courier or twenty-four (24) hours' notice either personally, by telephone, by facsimile or by electronic or digital transmission. Special meetings shall be called on the written request of any two (2) directors. The notice shall specify the purpose of the special meeting.

Section 8. Meeting Attendance or Participation as Waiver of Notice. A director's attendance at and participation in a meeting waives any required notice to him or her of the meeting.

Section 9. Meeting Participation by Means of Communication Equipment. Members of the Board of Directors or any committee designated by the Board of Directors may participate in a meeting of the Board of Directors or of such committee by means of a conference telephone or similar communication equipment by means of which all persons participating in the meeting can communicate with the other participants, and participation in a meeting pursuant to this paragraph shall constitute presence in person at such meeting.

Section 10. Quorum and Vote. At all meetings of the Board or a committee thereof, a majority of the members of the Board of Directors then in office shall constitute a quorum for the transaction of business. The act of a majority of the members present at any meeting at which there is a quorum shall be the act of the Board of Directors or the committee.

Section 11. Action Without Meeting. Any action required or permitted to be taken pursuant to authorization voted at a meeting of the Board of Directors may be taken without a meeting if 80% of the Board of Directors then in office consent thereto in writing. The written consent has the same effect as a vote of the Board of Directors for all purposes.

Section 12. Committees. The Board of Directors may, by resolution passed by a majority of the whole Board, designate one or more committees, each committee to consist of one or more of the directors of the Corporation. A committee and each member thereof shall serve at the pleasure of the Board. Any committee, to the extent provided in the resolution of the Board, shall have and may exercise the powers of the Board of Directors in the management of the business and affairs of the Corporation. No committee, however, shall have the power or authority to amend the Articles of Incorporation or Bylaws of the Corporation, adopt an agreement of merger or share exchange, or fill vacancies in the Board of Directors. The committees shall keep regular minutes of their proceedings and report the same to the Board when required.

Section 13. Compensation. By affirmative vote of a majority of directors in office, the Board of Directors may establish reasonable compensation for directors for services to the Corporation as directors or for members of committees.

ARTICLE V OFFICERS

Section 1. Officers. The officers of the Corporation shall consist of a president, a treasurer, and a secretary, all of whom shall be elected by the Board of Directors. In addition, the Board of Directors may elect a chairman of the Board of Directors, a vice chairman of the Board of Directors, one or more vice presidents and such assistant secretaries and assistant treasurers as desired. Each officer shall hold his office until his successor is elected and qualified or until his earlier resignation or removal. The officers shall be elected at the first meeting of the Board of Directors after each annual meeting of Shareholders and may be elected at any other meeting. Any two or more offices may be held by the same person, but an officer shall not execute, acknowledge or verify any instrument in more than one capacity if the instrument is required by law to be executed, acknowledged or verified by two or more officers.

Section 2. Other Officers and Agents. The Board of Directors may appoint such other officers and agents as it may deem advisable, who shall hold their offices for such terms and shall exercise such powers and perform such duties as shall be determined from time to time by the Board of Directors. The Board may, by specific resolution, empower the chairman or the president to appoint such officers or agents.

Section 3. Removal. Any officer may be removed at any time, with or without cause, but only by the affirmative vote of 80% of the whole Board of Directors.

Section 4. Chairman and Vice Chairman. The chairman of the Board of Directors shall preside at all meetings of the Board of Directors and at all meetings of shareholders. The chairman shall also perform such other duties as from time to time may be assigned to him or her by the Board of Directors. If the chairman is unable to perform the duties of the chairman for any reason, the vice chairman shall preside at all meetings of the shareholders and at all meetings of the Board of Directors. The vice chairman shall not succeed to any of the other rights, powers or duties of the chairman. The vice chairman shall also perform such other duties as from time to time may be assigned to him or her by the Board of Directors.

Section 5. President. The president shall be the chief executive officer of the corporation, shall have general supervision, direction and control of the business of the Corporation and shall have the general powers and duties of management usually vested in or incident to the office of the president and chief executive officer of a corporation. In the absence or inability to act of the chairman and vice chairman of the Corporation, the president shall preside at all meetings of the shareholders and all meetings of the Board of Directors. The president shall also have such other powers and duties as from time to time may be assigned to him or her by the Board of Directors. Except as the Board of Directors shall authorize the execution thereof in some other manner, the president shall execute bonds, mortgages and other contracts in behalf of the Corporation and shall cause the seal to be affixed to any instrument requiring it. If the president becomes unable to perform the duties of this office for any reason, the Board of Directors shall appoint a successor to be the president of the Corporation.

Section 6. Treasurer. The treasurer shall have the custody of the corporate funds and securities and shall keep full and accurate account of receipts and disbursements in books belonging to the Corporation. The treasurer shall deposit all monies and other valuables in the name and to the credit of the Corporation in such depositories as may be designated by the Board of Directors. The treasurer shall disburse the funds of the Corporation as may be ordered by the Board of Directors or the president, taking proper vouchers for such disbursements. The treasurer shall render to the president and Board of Directors at the regular meetings of the Board of Directors, or whenever they may request it, an account of all his or her transactions as treasurer and of the financial condition of the Corporation. In general, the treasurer shall perform all the duties incident to the office of treasurer and such other duties as may be assigned to him or her by the Board of Directors of the president.

Section 7. Secretary. The secretary shall give, or cause to be given, notice of all meetings of shareholders and directors required by law or by these Bylaws, and all other notices so required. If the secretary is unable to do so, any such notice may be given by any person directed to do so by the chairman or vice chairman of the Board of Directors or the president. The secretary shall record all the proceedings of the meetings of the Corporation and of the directors in one or more books to be kept for that purpose, and shall perform all duties incident to the office of the secretary and such other duties as may be assigned to him or her by the directors, the chairman of the Board of Directors, or the president. The secretary shall have the custody of the seal of the Corporation and shall affix the same to all instruments requiring it, when authorized by the directors, the chairman of the Board of Directors, or the president, and attest the same.

Section 8. Compensation. The compensations of the officers shall be fixed from time to time by or under the direction of the Board of Directors. No officer shall be prevented from receiving a salary or other compensation by reason of the fact that he or she is also a director of the Corporation.

ARTICLE VI MISCELLANEOUS

Section 1. Fiscal Year. The fiscal year of this Corporation shall end on the 31st day of December in each year.

Section 2. Notices. Whenever any written notice is required to be given under the provisions of any law, the Articles of Incorporation for this Corporation, or by these Bylaws, it shall not be construed or interpreted to mean personal notice, unless expressly so stated, and any notice so required shall be deemed to be sufficient if given in writing by facsimile, electronic mail, overnight courier or first class mail, by depositing the same in a United States Post Office box, postage prepaid, addressed to the person entitled thereto at his address as it appears on the records of the Corporation, and such notice shall be deemed to have been given on the day of such mailing. Any person may waive such notice by a signed writing stating such waiver.

Section 3. Voting of Securities. Securities of another corporation, foreign or domestic, standing in the name of this Corporation, which are entitled to vote shall be voted, in person or by

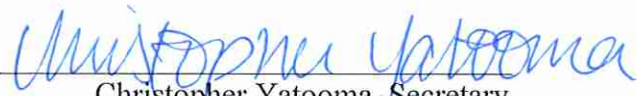
proxy, by the chairman of the Board or the president of this Corporation or by such other or additional persons as may be designated by the Board of Directors.

Section 4. Deposits. All funds of the Corporation not otherwise employed shall be deposited from time to time to the credit of the Corporation in such banks, trust companies or other depositories as the Board of Directors may select.

Section 5. Indemnification of Directors and Officers. Directors and officers of the Corporation shall be indemnified as of right to the fullest extent now or hereafter permitted by law in connection with any threatened, pending or completed civil, criminal, administrative or investigative action, suit or proceeding (whether brought by or in the name of the Corporation, a subsidiary or otherwise and whether formal or informal) in which a director or officer is a witness or which is brought against a director or officer in his or her capacity as a director, officer, employee, agent or fiduciary of the Corporation or of any corporation, partnership, joint venture, trust, employee benefit plan or other enterprise which the director or officer was serving at the request of the Corporation. Persons who are not directors or officers of the Corporation may be similarly indemnified in respect of such service to the extent authorized at any time by the Board of Directors of the Corporation. The Corporation may purchase and maintain insurance to protect itself and any such director, officer or other person against any liability asserted against him or her and incurred by him or her in respect of such service whether or not the Corporation would have the power to indemnify him or her against such liability by law or under the provisions of this Article. The provisions of this Article shall be applicable to actions, suits or proceedings, whether arising from acts or omissions occurring before or after the adoption hereof, and to directors, officers and other persons who have ceased to render such service, and shall inure to the benefit of the heirs, executors and administrators of the directors, officers and other persons referred to in this Article. The right of indemnity provided pursuant to this Article shall not be exclusive and the Corporation may provide indemnification to any person, by agreement or otherwise, on such terms and conditions as the Board of Directors may approve. Any agreement for indemnification of any director, officer, employee or other person may provide indemnification rights which are broader or otherwise different from those set forth in, or provided pursuant to, or in accordance with, this Article. Any amendment, alteration, modification, repeal or adoption of any provision in these Bylaws inconsistent with this Article VIII shall not adversely affect any indemnification right or protection of a director, officer, employee or other person of the Corporation existing at the time of such amendment, alteration, modification, repeal or adoption.

Section 6. Amendments. These Bylaws may be added to, altered, amended or repealed by a vote of 80% of the members of the Board of Directors then in office at any regular or special meeting of the Board. These Bylaws may also be added to, altered, amended or repealed by vote of the holders of 80% of the voting shares of capital stock issued and outstanding at any annual or special meeting and upon due notice of such proposed action, unless a greater plurality is required by law or by the Articles of Incorporation.

The foregoing Bylaws were adopted by the Board of Directors of True Cannabis, Inc. on December 2, 2021.


Christopher Yatooma, Secretary



Commonwealth of Massachusetts
Department of Revenue
Geoffrey E. Snyder, Commissioner

mass.gov/dor

Letter ID: L1097597632
Notice Date: November 22, 2021
Case ID: 0-001-323-933



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



TRUE CANNABIS, INC.
1615 S TELEGRAPH RD
BLOOMFIELD HILLS MI 48302-0065

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, TRUE CANNABIS, 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 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

000109

BUSINESS PLAN

Mission Statement and Message from the CEO

True Cannabis, Inc. (“True Cannabis”) is an applicant for Marijuana Establishment Licenses in the Commonwealth and is committed to creating a safe and clean community environment that provides consistent, high-quality cannabis for consumers who are 21 years of age or older.

True Cannabis intends to operate as a Marijuana Cultivator in Heath, Massachusetts and will cultivate its marijuana outdoors.

What Drives Us

True Cannabis’ goals include:

1. Providing customers 21 years of age or older with a wide variety of high quality, consistent, laboratory-tested cannabis and derivatives;
2. Assisting local communities in offsetting the cost of True Cannabis’ operations within its communities;
3. Hiring employees and contractors from within the communities served;
4. Hiring employees and contractors from communities that have been disproportionately impacted by the war on drugs;
5. Having a diverse and socially representative pool of employees;
6. Empowering the next generation of entrepreneurs and leaders through hiring, training and teaching; and
7. Running an environmentally friendly Outdoor Marijuana Cultivator facility.

COMPANY DESCRIPTION

Structure

True Cannabis is a Massachusetts domestic for-profit corporation that is applying for a License from the Commission to operate an outdoor Marijuana Cultivator in the Commonwealth. True Cannabis will file, in a form and manner specified by the Commission, an application for licensure as a Marijuana Establishment.

Operations

True Cannabis will establish inventory controls and procedures for the conduct of inventory reviews and comprehensive inventories of marijuana products in the process of cultivation and finished, stored marijuana; conduct a monthly inventory of marijuana in the process of cultivation and finished, stored marijuana; conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and promptly transcribe inventories if taken by use of an oral recording device. True Cannabis will tag and track all marijuana seeds, clones, plants, and

marijuana products using Metrc and in a form and manner approved by the Commission.

No marijuana product, including marijuana, will be sold or otherwise marketed for adult use that has not first been tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

True Cannabis will maintain records which will be available for inspection by the Commission upon request. The records will be maintained in accordance with generally accepted accounting principles and maintained for at least 12 months or as specified and required by 935 CMR 500.000.

True Cannabis will obtain and maintain general liability insurance coverage 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 will be no higher than \$5,000 per occurrence. If adequate coverage is unavailable at a reasonable rate, True Cannabis 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. True Cannabis will keep reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

True Cannabis will 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.

True Cannabis 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, True Cannabis will provide proof of having obtained a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation

Fund. The bond will 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 True Cannabis. If True Cannabis is unable to secure a surety bond, it will place in escrow a sum of no less than \$5,000 or such other amount approved by the Commission, to be expended for coverage of liabilities. The escrow account will be replenished within ten business days of any expenditure required under 935 CMR 500.105: *General Operational Requirements for Marijuana Establishments* unless True Cannabis has ceased operations. Documentation of the replenishment will be promptly sent to the Commission.

True Cannabis and True Cannabis agents will comply with all local rules, regulations, ordinances, and bylaws.

Security

True Cannabis will contract 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.

True Cannabis' state-of-the-art security system will be 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.

HD video surveillance of all areas that contain marijuana, entrances, exits, and parking lots will be operational 24/7 and available to the Police Department. These surveillance cameras will remain operational even in the event of a power outage. The exterior of the facility and surrounding area will be sufficiently lit, and foliage will be minimized to ensure clear visibility of the area at all times.

Only True Cannabis' 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 True Cannabis will maintain a current list of individuals with access. True Cannabis will have security personnel on-site during business hours.

On-site consumption of marijuana by True Cannabis' employees and visitors will be prohibited.

Benefits to Host Communities

True Cannabis looks forward to working cooperatively with its host communities to ensure that True Cannabis operates as a responsible, contributing member of those host communities. True Cannabis has established a mutually beneficial relationship with its host communities in exchange for permitting True Cannabis to site and operate.

True Cannabis' host communities stand to benefit in various ways, including but not limited to the following:

1. Jobs: A Marijuana Establishment facility will add a number of full-time jobs, in addition to hiring qualified, local contractors and vendors.
2. Monetary Benefits: A Host Community Agreement with significant monetary donations will provide the host community with additional financial benefits beyond local property taxes.
3. Access to Quality Product: True Cannabis 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.
4. Control: In addition to the Commission, the Police Department and other municipal departments will have oversight over True Cannabis' security systems and processes.
5. Responsibility: True Cannabis is comprised of experienced professionals who will be thoroughly background checked and scrutinized by the Commission.
6. Economic Development: True Cannabis' operation of its facilities will help to revitalize its host communities and contribute to the overall economic development of the local community.

MARKET RESEARCH

Customers

True Cannabis will only sell marijuana and marijuana products to other licensed Marijuana Establishments.

Competitors

True Cannabis' competitors include other licensed Marijuana Cultivators in the Commonwealth.

Competitive Advantage

True Cannabis' competitive advantages rests primarily in its outdoor cultivation processes, whereby True Cannabis will be able to provide consumers with quality, sun-grown cannabis. True Cannabis' cannabis will be of superior quality and will be held in high regard by even the most-discerning consumers.

Regulations

True Cannabis is a Massachusetts domestic for-profit corporation. True Cannabis will maintain the corporation in good standing with the Massachusetts Secretary of the Commonwealth, the Department of Revenue, and the Department of Unemployment Assistance. True Cannabis will apply for all state and local permits and approvals required to build out and operate the facility.

True Cannabis 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.

Products & Services

True Cannabis will offer a wide variety of traditional sativa, indica, and hybrid cannabis flower.

Pricing Structure

True Cannabis' pricing structure will vary based on market conditions. True Cannabis plans to provide products of superior quality and will price accordingly. At the same time, True Cannabis hopes to take advantage of economies of scale by maximizing its canopy footprint (within the requirements of 935 CMR 500.050(1)(b)(5)).

MARKETING & SALES

Growth Strategy

True Cannabis' plan to grow the company includes:

1. Strong and consistent branding;
2. Intelligent, targeted, and compliant marketing programs;
3. An exemplary customer in-store experience; and
4. A caring and thoughtful staff made of consummate professionals.

Communication

True Cannabis will engage in reasonable marketing, advertising, and branding practices 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 will include the statement: "Please Consume Responsibly," in a conspicuous manner on the face of the advertisement and will 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 True Cannabis will include the following warning, including capitalization, in accordance with M.G.L. c.

94G, § 4(a½)(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.”

True Cannabis will seek events where 85% or more of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data. At these events, True Cannabis will market its products and services to reach a wide range of qualified consumers.

True Cannabis will communicate with customers through:

1. A company run website;
2. A company blog;
3. Popular cannabis discovery networks such as WeedMaps and Leafly;
4. Popular social media platforms such as Instagram, Facebook, Twitter, and SnapChat; and
5. Opt-in direct communications.

FINAL REMARKS

True Cannabis has the experience and know-how to safely and efficiently cultivate high quality, consistent, laboratory-tested, sun-grown cannabis for adult-use consumers who are at least 21 years of age. True Cannabis’ security systems and comprehensive security measures also help ensure a safe and secure environment that will help deter and prevent diversion.

In Massachusetts, adult-use sales eclipsed \$2 billion in September 2021, less than three years after adult-use sales began in the Commonwealth. As more Marijuana Establishments become operational, the sales growth rate continues to expand month after month. True Cannabis has positioned itself well in this market and will contribute to this growth through a highly experienced team of successful operators working under an established framework of high-quality standard operating procedures and growth strategies. In doing so, True Cannabis looks forward to working cooperatively with the Town of Heath to help spread the benefits that this market will yield.

PLAN FOR OBTAINING LIABILITY INSURANCE

True Cannabis, Inc. (“True Cannabis”) 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. True Cannabis will consider additional coverage based on availability and cost-benefit analysis.

If adequate coverage is unavailable at a reasonable rate, True Cannabis 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. True Cannabis 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.

PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

Pursuant to 935 CMR 500.050(8)(b), True Cannabis, Inc. (“True Cannabis”) 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. Upon entry into the premises of the marijuana establishment by an individual, visitor, or agent, a True Cannabis agent will immediately inspect the person’s proof of identification and determine the person’s age.

In the event True Cannabis 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). True Cannabis 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), True Cannabis will not engage in any advertising practices that are targeted to, deemed to appeal to or portray minors under the age of 21. True Cannabis 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. True Cannabis 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), True Cannabis 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. True Cannabis’ 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

True Cannabis, Inc. ("True Cannabis") will comply with the following sanitary requirements:

1. Any True Cannabis 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 True Cannabis 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. True Cannabis' 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 True Cannabis' 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. True Cannabis' facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. True Cannabis 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. True Cannabis' floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. True Cannabis' facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. True Cannabis' buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. True Cannabis 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. True Cannabis acknowledges and understands that the Commission may require True Cannabis to demonstrate the intended and actual use of any toxic items found on True Cannabis' premises;
11. True Cannabis 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 True Cannabis' needs;
12. True Cannabis' 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. True Cannabis will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. True Cannabis 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. True Cannabis 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.

True Cannabis' 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).

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

True Cannabis 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 True Cannabis 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.

Testing

True Cannabis 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 True Cannabis 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 True Cannabis' 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 True Cannabis' 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.

True Cannabis' 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*. True Cannabis acknowledges and understands that the Commission may require additional testing.

True Cannabis' 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 True Cannabis 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.

True Cannabis will maintain testing results in compliance with 935 CMR 500.000 *et seq* and their record keeping policies described herein and will maintain the results of all testing for no less than one year. True Cannabis 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 True Cannabis' 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 True Cannabis 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

True Cannabis may create a sample of Marijuana flower ("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 True Cannabis 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 True Cannabis' 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.

True Cannabis 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, True Cannabis 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

True Cannabis, Inc. (“True Cannabis”) will securely maintain personnel records, including registration status and background check records. True Cannabis 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 True Cannabis 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 True Cannabis will undergo a detailed background investigation prior to being granted access to a True Cannabis facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for True Cannabis 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, True Cannabis 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, True Cannabis 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, True Cannabis 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 True Cannabis or the Commission.

Personnel Policies and Training

As outlined in True Cannabis' 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 True Cannabis agents are required to complete training as detailed in True Cannabis' Qualifications and Training plan which includes but is not limited to True Cannabis' 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).

True Cannabis 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 True Cannabis 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

True Cannabis, Inc. (“True Cannabis”) 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 True Cannabis documents. Records will be stored at True Cannabis 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 True Cannabis 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 True Cannabis’ quarter-end closing procedures. In addition, True Cannabis’ 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 True Cannabis.

- 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 True Cannabis 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; and
 - 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

- True Cannabis 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
 - True Cannabis 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, True Cannabis 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 True Cannabis 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 True Cannabis' 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, True Cannabis 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 True Cannabis agents present during the disposal or other handling, with their signatures. True Cannabis 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 True Cannabis is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.
- Transportation Records
 - True Cannabis 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 True Cannabis' 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
 - True Cannabis 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 True Cannabis closes, all records will be kept for at least two (2) years at True Cannabis' expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, True Cannabis 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 True Cannabis' 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 True Cannabis' 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 True Cannabis 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 True Cannabis, 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 True Cannabis' website.

- Policies and procedures for the handling of cash on True Cannabis 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
 - True Cannabis 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

True Cannabis 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

True Cannabis, Inc.'s ("True Cannabis") 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 True Cannabis.
- 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 True Cannabis 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; and
- 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.
- 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
 - True Cannabis 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

True Cannabis, Inc. (“True Cannabis”) will ensure that all employees hired to work at a True Cannabis facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner. True Cannabis will maintain a list of anticipated positions and their qualifications.

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.

True Cannabis will also ensure that its employees are suitable for registration consistent with the provisions of 935 CMR 500.802. In the event that True Cannabis discovers any of its agents are not suitable for registration as a marijuana establishment agent, the agent’s employment will be terminated, and True Cannabis 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 True Cannabis’ agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent’s job function. A True Cannabis 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 True Cannabis or by a third-party vendor engaged by the True Cannabis. Basic on-the-job training in the ordinary course of business may also be counted towards the required eight (8) hour training.

All True Cannabis 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

True Cannabis 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 True Cannabis Agents which shall include:
 - Conduct of True Cannabis 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;
 - 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.

True Cannabis 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. True Cannabis’ 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 True Cannabis Agent involved in the handling or sale of marijuana will fulfill the four-hour RVT requirement every year thereafter for True Cannabis to maintain designation as a Responsible Vendor. Once the True Cannabis 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

True Cannabis, Inc. (“True Cannabis”) will ensure its cultivation facility remains in compliance with the Commission’s energy efficiency and conservation regulations.

Potential Energy-Use Reduction Opportunities

As an outdoor cultivation facility, True Cannabis will rely primarily on the sun for the lighting and energy aspects of plant cultivation, which substantially reduces the need for traditional lighting sources and electric demand and significantly reduce the overall energy need compared to indoor cultivation facilities

Renewable Energy Generation Opportunities

To achieve maximum energy efficiency and conservation, as well as environmental sustainability, True Cannabis will rely primarily on natural sunlight, which is the cleanest and most abundant renewable energy source available, for the energy generation aspect of cultivation operations.

Strategies to Reduce Electric Demand

As an outdoor cultivation facility, True Cannabis will rely primarily on natural sunlight for plant cultivation, which will substantially reduce the need for traditional lighting sources and electric demand.

As the need and opportunity for facility upgrades and maintenance arise in the future and the company becomes cash flow positive, True Cannabis will continue to evaluate strategies to reduce electric demand, including the use of solar-powered utilities, energy-efficient climate control equipment for its storage areas, and energy-efficient transport vehicles.

Opportunities for Engagement with Energy Efficiency Programs

As the need and opportunity for facility upgrades and maintenance arise in the future and the company becomes cash flow positive, True Cannabis will continue to evaluate its options for engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, s. 21, or through municipal lighting plants.

THE TRUE CANNABIS DIVERSITY PLAN

Statement of Purpose

At True Cannabis, Inc. (“True Cannabis”), diversity, equity, and inclusion are at the core of who we are. Our commitment to these values is unwavering. They are central to our mission and to our impact. We know that having varied perspectives helps generate better ideas to solve the complex problems of a changing and increasingly diverse industry.

Goals

In order for True Cannabis to promote equity for the above-listed groups in its operations, True Cannabis has established the following goals:

- Recruit and hire a diverse group of employees that values and promotes inclusiveness among the workforce by having a staff consisting of 30% women, 50% minorities, 10% LGBTQ+, 10% veterans, and 10% individuals with disabilities.
- Facilitate upward mobility for all women, minorities, LGBTQ+, veterans and people with disabilities that desire and pursue advancement by promoting to managerial and executive positions internally with a goal of having at least 25% of managerial and executive positions held by women, minorities, LGBTQ+ individuals, veterans and/or people with disabilities.

Planned Programs

True Cannabis has developed specific programs to effectuate its stated goals to promote diversity and equity in its operations, which will include the following:

- The applicant’s staff will consist of 30% women, 50% minorities, 10% LGBTQ+, 10% veterans, and 10% individuals with disabilities. Applicant will post job openings in the local newspapers of disproportionately impacted communities as well as on recruitment sites like horizontaltalent.com as needed or, minimally, once a year.
- In order to provide the tools for success to the above listed demographics, applicant will provide all employees with biannual training focused on awareness and promoting diversity and inclusion among the staff with topics that include managing bias in the workplace, identifying and addressing microaggressions, and the science behind exclusion and belonging and its impact on individual decisions. Each training shall accommodate as many individual employees as possible until all employees have undergone the training.
- Applicant will provide advancement to managerial and executive positions internally. When a managerial or executive position opens up, applicant will consider internal applicants before placing a job posting on any public forum. Every employee will be encouraged to apply when a promotion opportunity is

available. This will help with promoting diversity in the workplace by creating opportunities for exposure to senior leadership for every employee.

Measurable Outcomes

The Community Engagement Officer will administer the Plan and will be responsible for developing measurable outcomes to ensure True Cannabis continues to meet its commitments. Such measurable outcomes, in accordance with True Cannabis' goals and programs described above, include:

- *The number of employees from each above identified demographic.*
 - The applicant will count the number of employees hired from each above identified demographics, determine what percentage of the applicants workforce these individuals make up and compare the result to its goal.
- *Biannual training.*
 - Applicant will count the number of training sessions offered throughout the year and compare it to its goal of two.

Beginning upon receipt of True Cannabis' first Provisional License from the Commission to operate a marijuana establishment in the Commonwealth, True Cannabis will utilize the 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. The Community Engagement Officer will review and evaluate True Cannabis' measurable outcomes no less than twice annually to ensure that True Cannabis is meeting its commitments. True Cannabis is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

Acknowledgements

- True Cannabis 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 True Cannabis will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.