



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR282909
Original Issued Date: 08/13/2021
Issued Date: 08/13/2021
Expiration Date: 08/13/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: True East Leaf LLC

Phone Number: 413-841-1238
Email Address: trueeastleaf@gmail.com

Business Address 1: 161 Seymour Street
Business City: Pittsfield
Business State: MA
Business Zip Code: 01201
Business Address 2:
Mailing Address 1: 12 Vivian Avenue
Mailing City: Pittsfield
Mailing State: MA
Mailing Zip Code: 01201
Mailing Address 2:

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

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

PRIORITY APPLICANT

Priority Applicant: no
Priority Applicant Type: Not a Priority Applicant
Economic Empowerment Applicant Certification Number:
RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:
Department of Public Health RMD Registration Number:
Operational and Registration Status:
To your knowledge, is the existing RMD certificate of registration in good standing?:
If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 51
Role: Owner / Partner
First Name: Kayley
Percentage Of Control: 51
Other Role:
Last Name: Stasiewski
Suffix:

Community Agreement	Reduced.pdf			
Plan to Remain Compliant with Local Zoning	true.east.leaf-pittsfield-plan to remain compliant with local permits.bylaws - 5.8.21.docx (1).pdf	pdf	609950ff031c12076ccf37d7	05/10/2021

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	NEVA letter for True East Leaf.pdf	pdf	6095cebe8ecb05074fe6aba3	05/07/2021
Other	MRCC letter for True East Leaf.pdf	pdf	6095cebfe067a90777b5088e	05/07/2021
Plan for Positive Impact	FINAL - True East Leaf Positive Impact Plan (1).pdf	pdf	60994ef73fd8b2075df9e249	05/10/2021

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner Other Role:
First Name: Kayley Last Name: Stasiewski Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 2

Role: Owner / Partner Other Role:
First Name: Thomas Last Name: Pytko 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
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing - The Commonwealth.pdf	pdf	6095ca0f954bd3079c690c8a	05/07/2021
Department of Revenue - Certificate of Good standing	Certificate of Good Standing - Dept of Revenue.pdf	pdf	6095ca1109011007a03d1880	05/07/2021
Bylaws	Operating Agreement.pdf	pdf	6095ca1e3fd8b2075df9decb	05/07/2021
Department of Revenue - Certificate of Good standing	Unemployment Form.pdf	pdf	6095ca2968436d078d6b32b2	05/07/2021
Articles of Organization	Certificate of Organization reduced.pdf	pdf	6095ca378ecb05074fe6ab9b	05/07/2021

No documents uploaded

Date generated: 09/24/2021

Massachusetts Business Identification Number: 001370033

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	Proposed Timeline.docx.pdf	pdf	6095ca583bbe600765b4dbef	05/07/2021
Plan for Liability Insurance	Plan to Obtain Liability Insurance.docx.pdf	pdf	6095ca5a954bd3079c690c8e	05/07/2021
Business Plan	Business Plan.pdf	pdf	60a56c47e067a90777b53307	05/19/2021

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	TEL - Plan for Obtaining Marijuana and Marijuana Products - Retail.pdf	pdf	6095cc7a954bd3079c690c92	05/07/2021
Restricting Access to age 21 and older	TEL - Restricting Access to age 21 and older - Retail.pdf	pdf	6095cc7d09011007a03d1888	05/07/2021
Security plan	TEL - Security Plan - Retail.pdf	pdf	6095cc8185675207abc7a90a	05/07/2021
Prevention of diversion	TEL - Prevention of Diversion - Retail.pdf	pdf	6095cc863fd8b2075df9decf	05/07/2021
Storage of marijuana	TEL - Storage of Marijuana - Retail.pdf	pdf	6095cc8868436d078d6b32b7	05/07/2021
Transportation of marijuana	TEL - Transportation of Marijuana - Retail.pdf	pdf	6095ccc6031c12076ccf3455	05/07/2021
Inventory procedures	TEL - Inventory Procedures - Retail.pdf	pdf	6095ccc78f80610756a12d03	05/07/2021
Quality control and testing	TEL - Quality Control and Testing - RETAIL.pdf	pdf	6095cccab15b2007955522c7	05/07/2021
Dispensing procedures	TEL - Dispensing Procedures - Retail.pdf	pdf	6095ccce247e180786c96550	05/07/2021
Personnel policies including background checks	TEL - Personnel Policies Including Background Checks - Retail.pdf	pdf	6095cccfe067a90777b50889	05/07/2021
Record Keeping procedures	TEL - Record Keeping Procedures - Retail.pdf	pdf	6095cd0409011007a03d188c	05/07/2021
Maintaining of financial records	TEL - Maintaining of Financial Records - Retail.pdf	pdf	6095cd072e7a1d0770d09784	05/07/2021
Qualifications and training	TEL - Qualifications and Training - Retail.pdf	pdf	6095cd0d6f8420077bfc7d4e	05/07/2021
Energy Compliance Plan	True East Leaf - Energy Compliance Plan - Retail.pdf	pdf	6095cd0e68436d078d6b32bb	05/07/2021
Diversity plan	updated FINAL 6-3-2021 - True East Leaf Diversity Plan.pdf	pdf	60b8ea2dbcbcb5a3617910629	06/03/2021

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

Date generated: 09/24/2021

Page: 4 of 5

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: 10:00 AM	Monday To: 7:00 PM
Tuesday From: 10:00 AM	Tuesday To: 7:00 PM
Wednesday From: 10:00 AM	Wednesday To: 7:00 PM
Thursday From: 10:00 AM	Thursday To: 7:00 PM
Friday From: 10:00 AM	Friday To: 7:00 PM
Saturday From: 10:00 AM	Saturday To: 7:00 PM
Sunday From: 10:00 AM	Sunday To: 7:00 PM

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): 4/22/2021
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).



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:
- b. Name of publication:

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:

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:

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 East Leaf

Name of applicant's authorized representative:

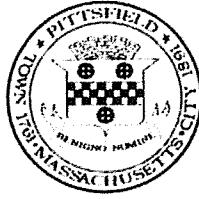
Kayley Stasiewski

Signature of applicant's authorized representative:

Kayley Stasiewski

Digitally signed by Kayley Stasiewski
Date: 2021.04.28 13:20:00 -04'00'





CITY OF PITTSFIELD
OFFICE OF THE CITY SOLICITOR, CITY HALL, 70 ALLEN STREET, SUITE 200,
PITTSFIELD, MASSACHUSETTS 01201

Tel. (413) 499-9352
Solicitor@cityofpittsfield.org

Via Email

March 31, 2021

Karen Calton, Esq.
Mensing Group, LLC
100 State Street, 9th Floor
Boston, MA 02109

Re: True East Leaf, LLC – City of Pittsfield

Dear Attorney Calton:

The City of Pittsfield hereby consents to your request to allow True East Leaf, LLC to hold a virtual community outreach meeting.

Please let us know if you need anything further from the City of Pittsfield on this matter.

Respectfully,

A handwritten signature in black ink, appearing to be "S. Pagnotta", written over a horizontal line.

Stephen N. Pagnotta
City Solicitor

True East Leaf LLC

Number of attendees at Community Outreach Meeting

5

True East Leaf LLC

Link to recording of Community Outreach Meeting

<https://youtu.be/1q66AqWZ5g4>



ATTACHMET B

April 05, 2021

To whom it may concern:

Notice is hereby given that a Community Outreach Meeting for a proposed Adult-Use Marijuana Retail and Cultivation Establishment is scheduled for **Thursday, April 22, 2021 at 6:00 p.m.** In light of COVID-19, the meeting will be held virtually as follows:

Join Zoom Meeting: <https://us06web.zoom.us/j/83490839427>

Meeting ID: 834 9083 9427

or Via Dial-in: (929) 205-6099 and entering the Meeting ID

The proposed Adult-Use Marijuana Retail and Cultivation Establishment is anticipated to be located at 161 Seymour Street, Pittsfield, MA 01021. There will be an opportunity for the public to ask questions.

Sincerely, on behalf of True East Leaf LLC,

Blake M. Mensing
Founder & Chief Counsel
The Mensing Group LLC
100 State Street, 9th Floor
Boston, MA 02109
Direct: (617) 333-8725
Email: Blake@MensingGroup.com

NAME	ADDRESS	ADDRESS 2	TOWN/CITY	STATE	Zip
Nathaniel Joyner	Attention: Community Development	70 Allen Street	Pittsfield	MA	01201
Catherine VanBramer	Attention: Mayor's Office	70 Allen Street	Pittsfield	MA	01201
Mayor Linda Tyer	Attention: Mayor's Office	70 Allen Street	Pittsfield	MA	01201
Rosaura Román	Attention: City Solicitor	70 Allen Street	Pittsfield	MA	01201



ATTACHMENT C

April 05, 2021

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Sincerely, on behalf of True East Leaf LLC,

Blake M. Mensing
Founder & Chief Counsel
The Mensing Group LLC
100 State Street, 9th Floor
Boston, MA 02109
Direct: (617) 333-8725
Email: Blake@MensingGroup.com

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Host Community Agreement Certification Form

The applicant and contracting authority for the host community must complete each section of this form before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant and/or municipality appear in italics. 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(1).

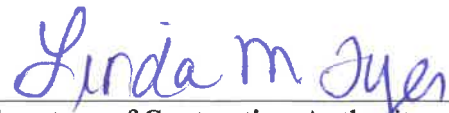
Applicant

I, Kayley Stasiewski, (*insert name*) certify as an authorized representative of True East Leaf LLC (*insert name of applicant*) that the applicant has executed a host community agreement with City of Pittsfield (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on 8/10/20 (*insert date*).


Signature of Authorized Representative of Applicant

Host Community

I, Linda M. Tyer, Mayor, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for City of Pittsfield (*insert name of host community*) to certify that the applicant and City of Pittsfield (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 8/10/2020 (*insert date*).


Signature of Contracting Authority or
Authorized Representative of Host Community

True East Leaf, LLC

Adult Use Marijuana Establishment for Retail and Cultivation
161 Seymour Street, Pittsfield, Mass., Berkshire County
Assessor ID H110001013

Plan to Remain Compliant with Local Permits and Zoning

True East Leaf, LLC, (the Applicant), is seeking a marijuana establishment permit for retail and cultivation at 161 Seymour Street in the City of Pittsfield and the site is located within the City's General Business (BG) zoning district and both of these uses are allowed by special use permit from the City's Zoning Board of Appeals (ZBA) with Site Plan Review and Recommendation by the City's Planning Board.

The Applicant shall duly apply-for and comply-with the ordinance provisions and requirements and all applicable conditions that may be imposed by the Zoning and Planning Boards during the permitting process. The Applicant's site meets the distancing/setback requirements from playgrounds, schools, etc., set forth in the City's ordinance and as set forth in the CCC statutes and regulations. The Applicant has reviewed the submission requirements for the conditional/special permit and the criteria/findings for a special permit to issue, all of which are consistent with the 935 CMR 500, and can and will meet all such requirements and obtain and maintain its permits as required.

The site consists of 9,900 square feet with a single-level brick-and-mortar retail shop on Seymour Street and two-story attached multi-use building for offices/storage/warehouse and cultivation areas on the first floor and apartment/office uses on the 2nd floor and there is no prohibition on these mixed uses occurring on site. The property was previously used as a bakery and has had a history of mixed uses, including manufacturing with support areas, restaurant with storage, warehousing and apartment/offices on upper floor.

The time frame for obtaining this marijuana establishment special permit from ZBA with site plan recommendation from Planning Board is as follows: Upon formal filing with city clerk, approximately 21 days for publishing and posting of public notice of hearing date; anticipation of one or two hearings to be accomplished between 30 to 65 days following filing; approximately 14 days for board's writing of final decision and filing of decision with town clerk for 20-day appeal period. Total time-frame is approximately 120-150 days for special permit and site plan review. A building permit with professional engineering stamped/signed plans will be submitted for application for building permit and the building dept. has 30 days to issue upon confirmation that submitted construction filings/plans comply with building code. After construction, a certificate of use/occupancy will be required prior to commencing operations, which typically takes 15 to 30 days to obtain.

END OF COMPLIANCE PLAN

True East Leaf LLC

POSITIVE IMPACT PLAN

Governed by: M.G.L. ch. 94G, §4 and 935 CMR 500.101(1)(a)(11)

True East Leaf LLC (“True East Leaf” or “the Company”) is dedicated to serving and supporting those disproportionately harmed by cannabis prohibition. True East Leaf’s Positive Impact Plan is an effort to respond to evidence which demonstrates that certain populations have been disproportionately impacted by high rates of arrest and incarceration for marijuana and other drug crimes as a result of state and federal drug policy.

The Cannabis Control Commission has identified the following Groups as those that should be targeted and supported:

1. Certified Economic Empowerment recipients;
2. Social Equity Program participants;
3. Past or present residents of the geographic areas of disproportionate impact (“ADI”), which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact;
4. Massachusetts residents who have past drug convictions; and
5. Massachusetts residents with parents or spouses who have past drug convictions.

To support such populations, True East Leaf has created a Positive Impact Plan, summarized below, and has identified numerous goals and priorities.

GOALS

#1 - Provide Massachusetts residents from ADIs with increased access to education and/or job training in the cannabis industry by giving financial support to *New England Veteran’s Alliance, Inc.*

#2 - Provide Massachusetts residents from ADIs with increased support, education and/or job training in the cannabis industry by giving financial support to *Massachusetts Recreational Consumer Council*.

#3 - Provide Massachusetts residents who have past drug convictions or who have parents or spouses who have had drug convictions with education and support relating to sealing criminal records to reduce barriers to entry in the cannabis industry and the workforce in general.

PROGRAMS

Our commitment to positively impact disproportionately harmed populations is an essential part of the company’s ethos. Specifically, to implement the defined Goals, True East Leaf will:

1. Give an annual donation of \$2,500 to *New England Veteran’s Alliance, Inc. (NEVA)*. NEVA endeavors to develop skills for its members through mentoring, educational and informational events with cannabis industry networking opportunities, and to provide financial support to allow them to continue to provide cultivation education and peer support groups for Veterans in Massachusetts. Funds donated will support two *New*

True East Leaf LLC

England Veteran's Alliance, Inc. programs that provide: (1) education to veterans on cannabis cultivation; and (2) peer support groups for veterans. *New England Veteran's Alliance, Inc.* has a membership consisting heavily of Massachusetts residents disproportionately impacted by the War on Drugs, including residents in Cannabis Control Commission defined "areas of disproportionate impact" and individuals who have had a past drug conviction and have lived in the Commonwealth of Massachusetts within the last 12 months. A donation to NEVA will help residents of areas of disproportionate impact increase their chances of receiving a position in the cannabis industry through mentorship, educational, and information events in addition to networking opportunities with cannabis companies.

2. Give an annual donation of \$2,500 to *Massachusetts Recreational Consumer Council (MRCC)*. MRCC seeks to make tangible commitments towards creating positive impact and outcomes in the communities most harmed by the war on drugs. These funds will support MRCC's educational seminars that specifically occur within communities that are Commission-approved areas of disproportionate impact (ADI) and for individuals that are from ADIs.
3. Host an annual record sealing workshop teaching which criminal records can be sealed and how to seal them. The workshop will also assist individuals through the sealing process with the courts or probation department. The workshop will be advertised in print and online sources to include ADI and local newspapers. Specific sources utilized will include, The Berkshire Eagle, Pittsfield Gazette. The workshop will be held at True East Leaf's facilities, and will each have a capacity of at least 5 participants. The topics for the workshops will include practical training and information that will assist Massachusetts residents to identify and seal eligible drug convictions.

MEASUREMENTS

1. True East Leaf will develop specific initiatives, creating partnerships and achieving measurable outcomes to ensure that True East Leaf meets the Plan's goals. We will audit the progress of the plan annually upon provisional license renewal and will disclose tracked measurement metrics. Metrics tracked will include the following:
2. At the end of each year, True East Leaf will conduct an analysis and create a report on the amounts and percentages of donations and other financial support that the company has given to NEVA as outlined above. True East Leaf will continue to assess the viability and impact of financial donations made and annually review donation amounts. NEVA will provide an annual report to True East Leaf summarizing the use of the funds, as well as indicating the number of veterans participating in the programs are from an area of disproportionate impact and/or whether the particular program assisted veterans with past drug convictions.
3. At the end of each year, True East Leaf will conduct an analysis and create a report on the amounts and percentages of donations and other financial support that the company has given to MRCC as outlined above. True East Leaf will continue to assess the viability and impact of financial donations made and annually review donation amounts. MRCC will provide True East Leaf with documentation that the programs occurred within communities that are Commission-approved areas of disproportionate impact and/or that they were for individuals that are from ADIs.

True East Leaf LLC

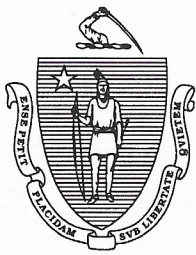
4. True East Leaf will document the record sealing workshop date, the topics discussed, the number of attendees, to which targeted group the attendees belong and referral sources. Participating individuals or businesses will be asked to complete an assessment of the program which will provide insight into the demographics of the attendees, the helpfulness and clarity of the topics presented as well as suggestions for future programs.

DISCLOSURES

True East Leaf acknowledges and 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 East Leaf will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

True East Leaf understands that the progress or success of this plan must be demonstrated upon each annual license renewal period in conformity with *935 CMR 500.103(4)(b)*.



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

William Francis Galvin
Secretary of the
Commonwealth

March 26, 2021

TO WHOM IT MAY CONCERN:

I hereby certify that a certificate of organization of a Limited Liability Company was filed in this office by

TRUE EAST LEAF LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **February 25, 2019.**

I further certify that said Limited Liability Company has filed all annual reports due and paid all fees with respect to such reports; that said Limited Liability Company has not filed a certificate of cancellation; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; and that said Limited Liability Company is in good standing with this office.

I also certify that the names of all managers listed in the most recent filing are: **KAYLEY TAYLOR STASIEWSKI, THOMAS JOSEPH PYTKO**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **KAYLEY TAYLOR STASIEWSKI, THOMAS JOSEPH PYTKO**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **NONE**



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

Processed By:TAA



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

mass.gov/dor

Letter ID: L1303733056
Notice Date: April 7, 2021
Case ID: 0-001-135-251



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



TRUE EAST LEAF LLC
12 VIVIAN AVE
PITTSFIELD MA 01201-2435

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, TRUE EAST LEAF LLC 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

TRUE EAST LEAF, L.L.C.

OPERATING AGREEMENT

THIS OPERATING AGREEMENT of TRUE EAST LEAF, L.L.C. (The "LLC"), dated February 25, 2019, is among Kayley Taylor Stasiewski and Thomas Joseph Pytko, Managers and Kayley Stasiewski and Thomas Pytko, members. The Members, intending to form a limited liability company pursuant to. The Massachusetts Limited Liability Company Act (the "Act"), hereby agree as follows:

1 Name of LLC. The name of the LLC is TRUE EAST LEAF, L.L.C. (The "LLC").

2. Business of LLC: Purposes and Powers

(a) The general character of the business of the LLC is to engage in ownership and operation of a marijuana retail and manufacturing business; and to engage in any activities directly or indirectly related or incidental thereto.

(b) Kayley Taylor Stasiewski and Thomas Joseph Pytko are designated Managers of the LLC. All decisions respecting any matter set forth herein or otherwise affecting or arising out of the conduct of the business of the LLC shall be made by the Managers, unless pursuant to this Agreement, the Act or other applicable law.

The Managers shall have the exclusive right and full authority to manage, conduct and operate the LLC's business. Specifically, but not by way of limitation, the Managers shall be authorized, for and on behalf of the LLC to do the following:

(i) to borrow money, to issue evidences of indebtedness and to guarantee the debts of others for whatever purposes they may specify, whether or not related to the LLC or the LLC's assets, and, as security therefor, to mortgage, pledge or otherwise encumber the assets of the LLC;

(ii) to cause to be paid on or before the due date thereof all amounts due and payable by the LLC to any person or entity;

(iii) to employ such agents, employees, managers, accountants, attorneys, consultants and other person necessary or appropriate to carry out the business and affairs of the LLC, whether or not any such persons so employed are Members or are affiliated or related to any Member; and to pay such fees, expenses, salaries, wages and other compensation to such persons as the Members shall in their sole discretion determine;

(iv) to pay, extend, renew, modify, adjust, submit to arbitration, prosecute, defend or compromise, upon such terms as they may determine and upon such evidence

as he may deem sufficient, any obligation, suit, liability, cause of action or claim, including taxes, either in favor of or against the LLC;

(v) to pay any and all fees and to make any and all expenditures that the Member, in his discretion, deem necessary or appropriate in connection with the organization of the LLC, and the carrying out of its obligations and responsibilities under this or any other Agreement;

(vi) to cause the LLC's property to be maintained and operated in a manner that satisfies in all respects the obligations imposed with respect to such maintenance and operation by law, by any mortgages encumbering such property from time to time, and by any lease, agreement or rental agreement pertaining to such property;

(vii) to cause necessary and proper repairs to be made, and supplies necessary for the proper operation, maintenance and repair of the LLC's property to be obtained;

(viii) to lease, sell, finance or refinance all or any portion of the LLC's property, real or personal.

(ix) to exercise all powers and authority granted by the Act to Member, except as otherwise specifically provided in this Agreement.

(c) The Manager of the LLC is authorized to execute on behalf of the LLC any documents to be filed with the Secretary of State of the Commonwealth of Massachusetts. The Manager is authorized to execute, acknowledge, deliver and record on behalf of the LLC any recordable instrument purporting to affect an interest in real property.

3. Office of the Limited Liability Company. The address of the office of the LLC for purposes of Section 5 of the Act is 161 Seymour Street, Pittsfield, MA 01201.

4. Agent for Service of Process. The name and address of the resident agent for service of process for the LLC is Kayley Stasiewski, 12 Vivian Ave., Pittsfield, MA 01201

5. Members' Names and Address. The names and business addresses of the Members are set forth in Schedule A attached hereto.

6 Term of the LLC

(a) The term of the LLC commenced February 25, 2019 upon filing on the date hereof a Certificate of Organization in the Office of the Secretary of State of the Commonwealth of Massachusetts. The term shall continue until the LLC is terminated by agreement of the Members unless earlier dissolved upon the occurrence of an event of dissolution under Section 43 of the Act (subject to the right to continue the LLC contained in Section

6(b), below, or pursuant to the Act).

(b) The Members may continue the business of the LLC upon the occurrence of any event that constitutes an event of dissolution of an LLC under the Act by electing to do so within 90 days after the occurrence of any such event. Any such election shall be made by unanimous vote of members in office.

7. Capital Contributions, Capital Account and Liability of Members.

(a) Each Member has contributed in cash to the capital of the LLC the amount set forth opposite such Member's name in Schedule A, hereto. Additional capital contributions may be made by any Member if agreed to by all Members.

Except as otherwise provided in this Section 7, no Member shall be obligated to contribute any additional capital to the LLC. No interest shall accrue on any contributions to the capital of the LLC, and no Member shall have the right to withdraw or be repaid any capital contributed by it or to receive any other payment in respect of its interest in the LLC, including, without limitation, as a result of the withdrawal or resignation of such Member from the LLC, except as specifically provided in this Agreement.

(b) A "Capital Account" shall be maintained for each Member and adjusted in accordance with Regulations under Section 704 of the Internal Revenue Code of 1986, as amended (the "Code"). To the extent consistent with such Regulations, the adjustment to such Capital Account shall include the following:

- (i) there shall be credited to each Member's Capital Account the amount of any cash or the net fair market value of any property actually contributed by such Member to the capital of the LLC, the amounts of liabilities of the LLC assumed by the member or to which property distributed by the member was subject, and such Member's share of the net profits of the LLC and of any items in the nature of income or gain separately allocated to the Members; and
- (ii) there shall be charged against each Member's Capital Account the amount of any cash and the net fair market value of any property distributed to such Member the amount of liabilities of the member assumed by the LLC or to which property contributed by the member was subject, and such Member's share of the net losses of the LLC and of any items in the nature of losses or deductions separately allocated to the Members.

(c) The liability of the Members for the losses, debts and obligations of the LLC shall be limited to their capital contributions; provided, however, that under applicable law, the Members may under certain circumstances be liable to the LLC to the extent of previous distributions made to them in the event that the LLC does not have sufficient assets to discharge its liabilities. Without limiting the foregoing, (i) no

Member, in his, her or its capacity as a Member shall have any liability to restore any negative balance in his, her or its Capital Account and (ii) the failure of the LLC to observe any formalities or requirements relating to exercise of its powers or management of its business or affairs under this Agreement or the Act shall not be grounds for imposing personal liability on the Members or Managers for liabilities of the LLC.,

8 .Return of Contributions .The contribution of each Member is to be returned to such Member only upon the termination and liquidation of the LLC, but contributions may be returned prior to such time if agreed upon by all Members.

9. Share of Net Losses and Cash Distributions.

(a) During the term of the LLC, the net cash flow, net proceeds of any sale or refinancing of any property of the LLC, and other distributions of cash or other property of the LLC, shall be allocated among the Members in proportion to their respective capital contributions. Subject to the foregoing, distributions to the Members shall be made at such times and in such amounts as the Members shall determine.

Distributions of net proceeds of liquidation of the LLC (whether of cash or other assets) shall be distributed to all Members with positive Capital Account balances (after such balances have been adjusted to reflect the allocation of net profits or net losses and items thereof through the date of liquidation pursuant to Section 9(b) in proportion to and to the extent of such positive balances.

A Member, regardless of the nature of his or her contribution to the LLC, shall have no right to demand or receive any distribution from the LLC in any form other than cash. The LLC may, at any time, and from time to time, make distributions in kind to the Members. If any assets of the LLC are distributed in kind, such assets shall be distributed on the basis of their fair market value as determined by the Members.

(b) Net profits and net losses as determined for purposes of adjusting Capital Account balances as provided in Treasury Regulations Section 1.704-1(b)(2)(iv)(b). Net profits or net losses of the LLC shall be allocated among the members in proportion to their respective capital contributions. For tax purposes, all items of depreciation, gain, loss, deduction or credit shall be determined in accordance with the Treasury Regulations under I.R.C. sec. 704(b), and, except to the extent otherwise required by the Code, allocated to and among the Members in the same percentages in which the Members share in net profits and net losses.

(c) Kayley Stasiewski shall be the "tax matters partner" of the LLC for purposes of the Code.

(d) No Member shall have any right to distributions respecting his or her membership interest (upon withdrawal or resignation from the LLC or otherwise) except as expressly set forth in this Agreement.

10. Substitution and Assignment of a Member's Interest. Resignation: Additional Members.

No Member may sell, assign, give, pledge, hypothecate, encumber or otherwise transfer, including, without limitation, any assignment or transfer by operation of law or by order of court, such Member's interest in the LLC or any part thereof, or in all or any part of the assets of the LLC, without the unanimous written consent of all of the other Members, and any purported assignment without such consent shall be null and void and of no effect whatsoever.

No assignee of the interest of a Member may be substituted as a member of the LLC without the unanimous written consent of all other Members.

A Member may not resign from or otherwise terminate his or her membership in the LLC without the prior approval of all other Members.

Additional Members may be admitted to the LLC if agreed to by all Members. Members holding a majority interest may remove any other members.

11. Miscellaneous

(a) The members shall cause the LLC to keep just and true books of account with respect to the operations of the LLC. Such books shall be maintained at the principal place of business of the LLC, or at such other place as the Members shall determine, and all Members and their duly authorized representatives shall, at all reasonable times, have access to such books.

(b) Such books shall be kept on the accrual method of accounting or on such other method of accounting as the Members may from time to time determine, and shall be closed and balanced as of December 31 each year. The same method of accounting shall be used for both LLC accounting and tax purposes. The fiscal year of the LLC shall be the calendar year.

(c) The Members shall cause the LLC to maintain one or more accounts in a bank (or banks) that is a member of the Federal Deposit Insurance Corporation (FDIC), which accounts shall be used for the payment of the expenditures incurred by the Members in connection with the business of the LLC, and in which shall be deposited any and all cash receipts. All such amounts shall be and remain the properties of the LLC, and shall be received, held and disbursed by the Members for the purposes specified in this Agreement.

(d) Subject to the restrictions on transfers set forth herein, this Agreement, and each and every provision hereof, shall be binding upon and shall inure to the benefit of the Members, their respective successors, successors in title, heirs and assigns, and each and every successor in interest to any Member, whether such successor acquires such interest by way of gift, purchase, foreclosure or any other method, and each party shall hold such

interest subject to all of the terms and provisions of this Agreement.

(e) No change, modification or amendment of this Agreement shall be valid or binding unless such change, modification or amendment shall be in writing and duly executed by all of the Members.

(f) This Agreement and the rights and obligations of the parties hereunder shall be governed by and interpreted, construed and enforced in accordance with the laws of the Commonwealth of Massachusetts.

(g) This Agreement may be executed in a number of counterparts, all of which together shall for all purposes constitute one Agreement, binding on all the Members, notwithstanding that all Members have not signed the same counterpart

(h) None of the provisions of this Agreement shall be for the benefit of or enforceable by any creditor of any Member, or any creditor of the LLC other than a member who is such a creditor of the LLC.

(i) The Members hereby agree that no Member or any successor in interest to any Member shall have the right while this Agreement remains in effect to have the property of the LLC partitioned, or to file a complaint or institute any proceeding at law or in equity to have the property of the LLC partitioned, and that each Member, on behalf of himself or herself, his or her successors, representatives, heirs and assigns, hereby waives any such right. It is the intention of the Members that, during the term of this Agreement, the rights of the Members and their successors in interest, as among themselves, shall be governed by the terms of this Agreement, and that the right of any Member or successor in interest to assign, transfer, sell or otherwise dispose of his or her interest in the LLC shall be subject to the limitations and restrictions of this Agreement.

This Agreement constitutes the full and complete agreement of the parties hereto with respect to the subject matter hereof.

IN WITNESS WHEREOF, the Members have signed and sworn to this Agreement under penalties of perjury as of the date first above written.

MEMBERS:

SCHEDULE "A"
Members

Kayley Stasiewski 12 Vivian Ave Pittsfield, MA 01201	51%
--	-----

Thomas Pytko 12 Vivian Ave Pittsfield, MA 01201	49%
---	-----

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

Signed under the pains and penalties of perjury, I, Kayley Stasiewski, an
authorized representative of True East Leaf certify that
True East Leaf 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.

Kayley S

Signature of Agent

Date

Name:

Title:

Entity:



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$500.00

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

Certificate of Organization

(General Laws, Chapter)

Identification Number: 001370033

1. The exact name of the limited liability company is: TRUE EAST LEAF LLC

2a. Location of its principal office:

No. and Street: 161 SEYMOUR STREET
 City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

2b. Street address of the office in the Commonwealth at which the records will be maintained:

No. and Street: 161 SEYMOUR STREET
 City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:

AFTER OBTAINING A LICENSE FROM THE CANNABIS CONTROL COMMISSION, THE GENERAL CHARACTER OF BUSINESS IS TO LEGALLY OWN AND OPERATE A CRAFT CANNABIS RETAIL STORE OFFERING RECREATIONAL MARIJUANA PRODUCTS.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: KAYLEY STASIEWSKI
 No. and Street: 12 VIVIAN AVENUE
 City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

I, KAYLEY STASIEWSKI resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

6. The name and business address of each manager, if any:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	KAYLEY TAYLOR STASIEWSKI	161 SEYMOUR STREET PITTSFIELD, MA 01201 USA
MANAGER	THOMAS JOSEPH PYTKO	161 SEYMOUR STREET PITTSFIELD, MA 01201 USA

7. The name and business address of the person(s) in addition to the manager(s), authorized to execute documents to be filed with the Corporations Division, and at least one person shall be named if there are no managers.

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code

8. The name and business address of the person(s) authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code

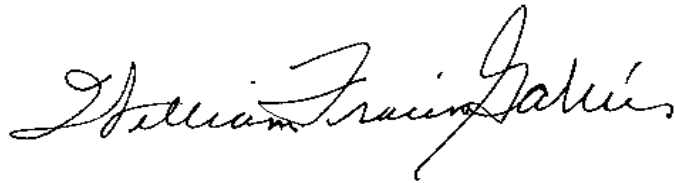
9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 25 Day of February, 2019,
KAYLEY STASIEWSKI
(The certificate must be signed by the person forming the LLC.)

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:

February 25, 2019 08:28 PM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive style with a large, stylized 'G' at the end.

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

PLAN TO OBTAIN LIABILITY INSURANCE

True East Leaf LLC (“True East Leaf”) will be contracting with Budrisk insurance brokerage to 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 & \$2,000,000 in aggregate, annually. The deductible for each policy will be no higher than \$5,000 per occurrence.



**TRUE EAST LEAF, LLC
BUSINESS PLAN**

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EXECUTIVE SUMMARY

True East Leaf LLC (“True East Leaf”) is a team of highly motivated individuals with a vision to create a unique, positive storefront experience when shopping for high quality craft cannabis. Their cultivating skills and knowledge of the plant will allow for limitless success in production.

True East Leaf plans to operate an adult-use retail dispensary and cultivation facility at 161 Seymour Street in Pittsfield. The building design is ideal for both types of businesses to thrive.

The cultivation will be tightly controlled and sophisticated in design to achieve the best results for harvesting. It will consist of two large vegetative grow rooms and three large flower grow rooms. The rooms will be on a constant cycle allowing for a harvest every 4-6 weeks.

The retail storefront will be designed specifically to create a relaxing atmosphere, enhancing the customer experience. This will be achieved through the use of calming hues of purple, also known to spark creativity – distinguishing itself from other dispensaries in the area. The design work will be done by local artists to support the community. The acrylic countertops will be custom made locally using cheerful colors to promote positive energy.

Surrounded by attractions including restaurants, food trucks, shops, Barrington Stage Company, and historic Wahconah Park, the location of this facility will be unmatched. Heavy foot traffic is anticipated as the building is near a bus stop, grocery store, hospital, apartments, and other homes. Since the location is especially accessible to walkers, having a crosswalk with lights in front of the building maximizes safety.

True East Leaf has established friendly relationships with the neighbors and are excited to continue to build new connections within the community. Each year, True East Leaf will participate in environmental clean ups to continually improve neglected areas of the city.

COMPANY DESCRIPTION & PRODUCTS

True East Leaf looks forward to effectively operating a safe and accessible adult-use retail storefront. They will offer a wide variety of products including cannabis flower, prerolls, edibles, topicals, and extracts. Products will be both in-house and outsourced to provide various options to the consumers. For outsourced products, True East Leaf will contract with trusted state licensed companies.

Some examples of products that will be available include:

- Flower - 20+ different strains
- Prerolls - regular, king size, special
- Edibles - baked goods, gummies, chocolate
- Topicals – lotions, oils, salves
- Extracts - hash, dry sift, rosin, shatter, wax

The cultivation will be focused on growing exotic, world-class cannabis bred by industry leaders. True East Leaf will have the ability to grow up to 50 exclusive strains with a diverse range of cannabinoids and terpenes. The goal is to provide premium cannabis to all customers while earning a positive and trustworthy reputation.

The cultivation portion of the building will include:

- vegetative room
- mother/clone room
- flowering rooms
- drying room
- trimming room
- packaging room

The flower that will be grown in-house will stand out from the competition. True East Leaf will be cultivating rare, resilient genetics accessible only at their retail shop. The crosses of the cannabis strains are hand selected after years of breeding. These strains will bring an excitement to the storefront every time they are released. True East Leaf is excited to introduce high quality craft cannabis to a market that is largely wholesale.

MARKET RESEARCH

True East Leaf's proposed location is in Pittsfield, Massachusetts. In 2020, Massachusetts total marijuana sales exceeded \$1 billion and will continue to increase into the future.

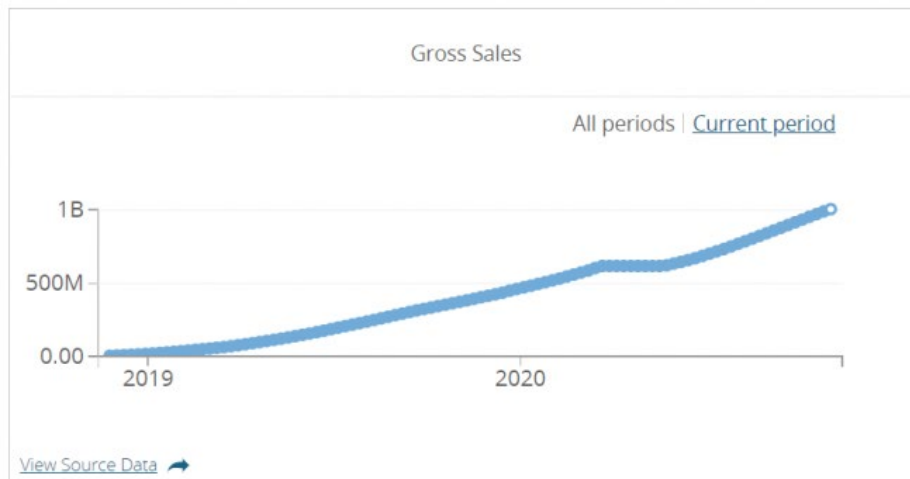
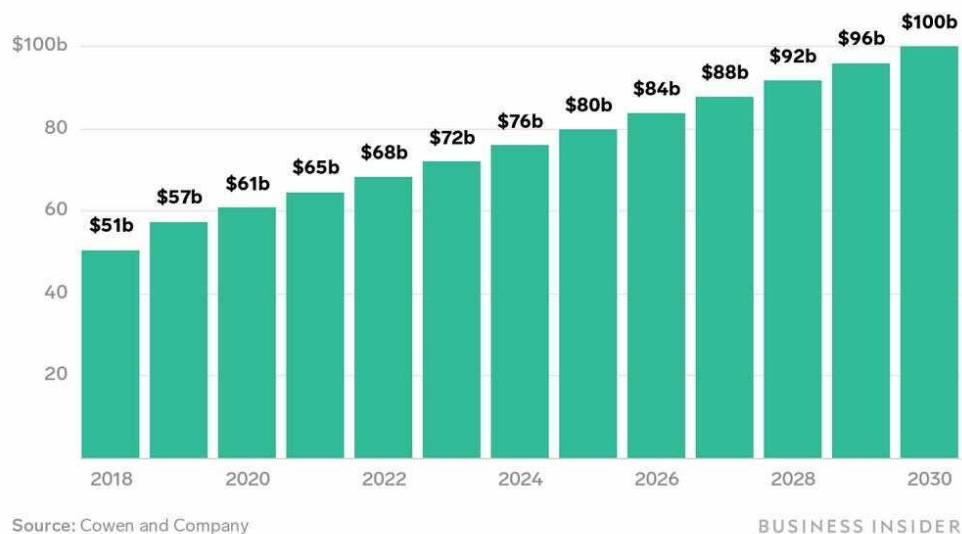


Image Source: Marijuana Moment

In January 2021, overall daily sales averaged \$2.8 million. Cowen Viven Azer, Wall Street's top cannabis analyst, predicted that the US cannabis market will reach \$80+ billion by 2030.

Projected US cannabis market



True East Leaf’s competitors in the industry include both retail storefronts and cultivations. True East Leaf will stand out from the competition by offering the highest quality craft cannabis, focused on exotic strains. Product prices will stay within the average cost offered at other dispensaries. The storefront will be warm and welcoming for all guests, with a focus on efficiency and speed.

Sourced by Verilife, 49% of millennials consume cannabis for recreational reasons. Although it is expected that visitors will be of all ages 21 years old and up, the target age group is 25-65 years old.

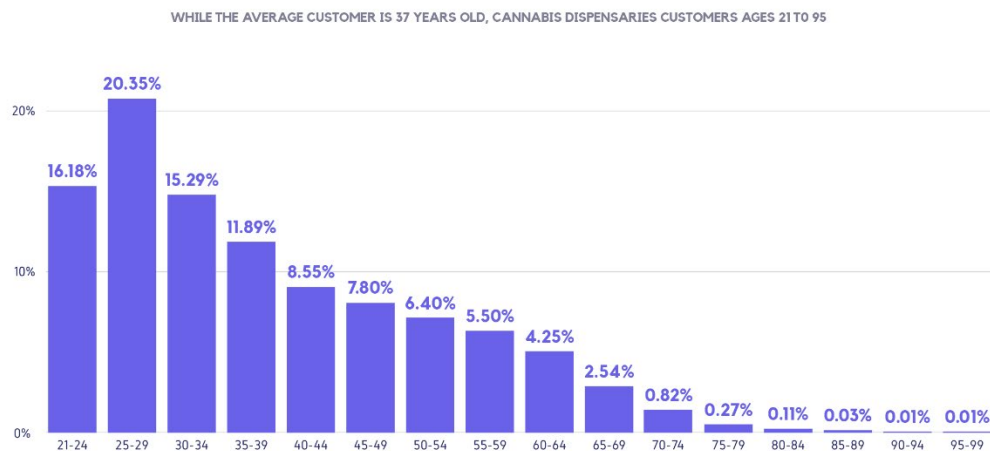
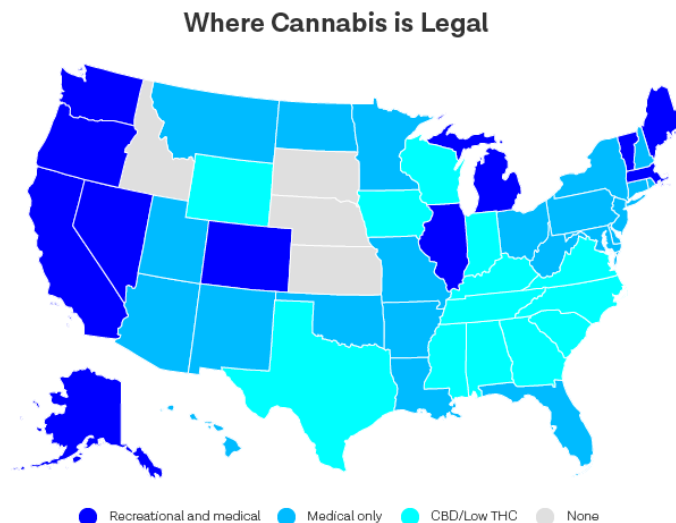


Chart source: Headset

It is anticipated that customers will visit the storefront from all over – both locally and from out of town.



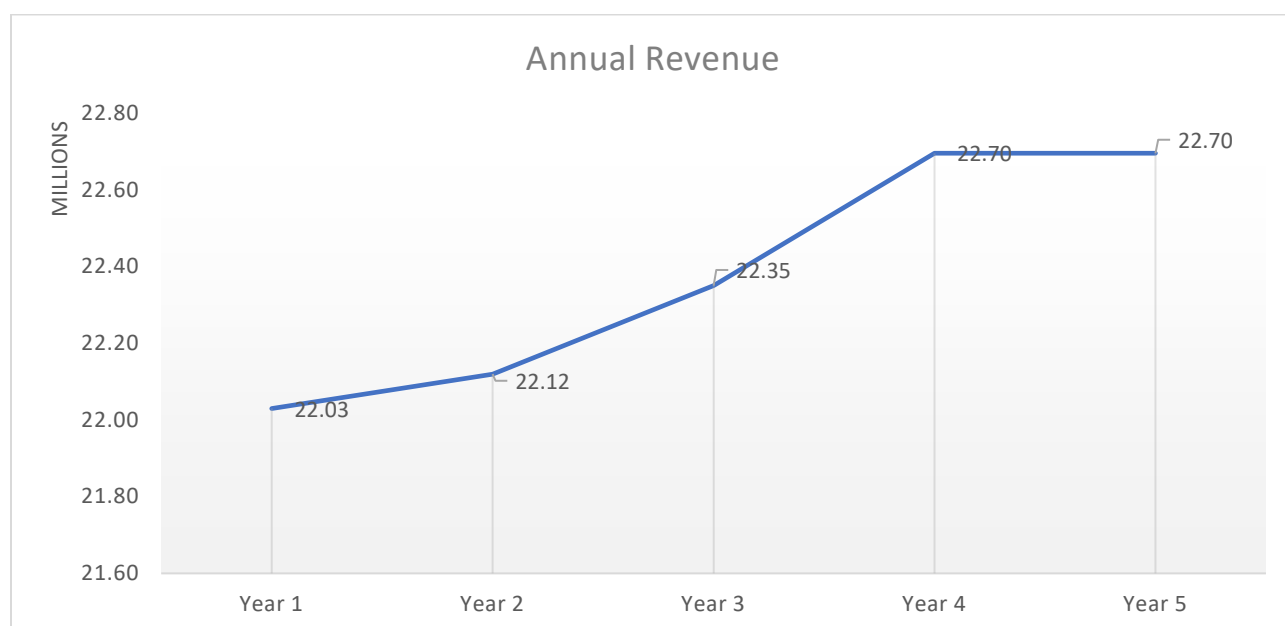
FINANCIAL FORECAST

The True East Leaf cultivation will commence operations after 6 months of the retail storefront being open. The first in-house harvest will take place in year 2.

In year 1, True East Leaf will rely on outsourced products to supply the storefront. They estimate to outsource 3,150 lbs. in the first year and 2,700 lbs. each year after that. They anticipate generating \$19.5M in year 1 from outsourced flower. Aside from flower, they will also outsource prerolls, edibles, topicals and extracts every year. They estimate to generate \$2.5M per year from these products. Once their cultivation is operating, True East Leaf anticipates growing 430-500 lbs. of in-house premium cannabis per year. They will sell each pound for around \$6,400, which will generate \$2.8-3.4M in total per year.

Annual revenue is estimated at \$22M in year 1, increasing over the years to \$22.7M in year 5.

Revenue	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5
In-House Flower	\$ -	\$ 2,880,000.00	\$ 3,110,400.00	\$ 3,456,000.00	\$ 3,456,000.00
Outsourced Flower	\$ 19,530,000.00	\$ 16,740,000.00	\$ 16,740,000.00	\$ 16,740,000.00	\$ 16,740,000.00
Other Products	\$ 2,500,000.00	\$ 2,500,000.00	\$ 2,500,000.00	\$ 2,500,000.00	\$ 2,500,000.00
	\$ 22,030,000.00	\$ 22,120,000.00	\$ 22,350,400.00	\$ 22,696,000.00	\$ 22,696,000.00



MARKETING AND SALES

True East Leaf will utilize social media platforms including Instagram, Facebook, Leafly, and Weedmaps to advertise and promote business. Currently, their existing Instagram page has exceeded 4,000 followers on the platform – all of which are looking forward to shopping at the storefront and supporting the business.

True East Leaf will have a strong online presence, promoting their business using hashtags and other marketing tactics. The company website will be set up for age verification to ensure that only adults 21 years old and up can visit. Photos will be posted online from inside the cultivation and storefront to give the viewers an inside look at plants and products. Vivid descriptions will be included with high-quality pictures.

True East Leaf will create relationships with local businesses to network. They will also establish connections with other state licensed marijuana businesses.

True East Leaf will both attend and host cannabis events where they will have the opportunity to grow brand awareness. When hosting events, a group of well-respected companies will act as sponsors in support. Products from the cultivation will be entered into state legal cannabis cup competitions.

Other marketing methods include magazines, email marketing, and learning seminars. Some magazines that True East Leaf intends to connect with are Sensi, Grow, 420, and High Times. For email marketing, True East Leaf will send out online brochures and newsletters to subscribers with the latest information and deals. Seminars will be hosted periodically to educate on the cannabis industry and cultivating processes.

TEAM

Kayley Stasiewski

(CEO/Director of Finance)

Kayley is a local native, residing only in Pittsfield. She received her Bachelor of Business Administration in Accounting from Isenberg School of Management, graduating magna cum laude in 2016. She was a member of the National Honor's Society. Since graduating, Kayley has worked in accounting and finance for large, global corporations here in Pittsfield.

Kayley has been a medical patient since 2014 and has been passionate about the benefits that come with consuming cannabis. In 2008, her mother was diagnosed with Multiple Sclerosis. She suggested her mother use cannabis for relief and was inspired to see the numerous positive effects it had on her nerve pain. This was what first piqued her interest in the cannabis industry, and she has been passionate about it ever since. Kayley is most excited to bring quality cannabis to the recreational market.

Thomas Pytko

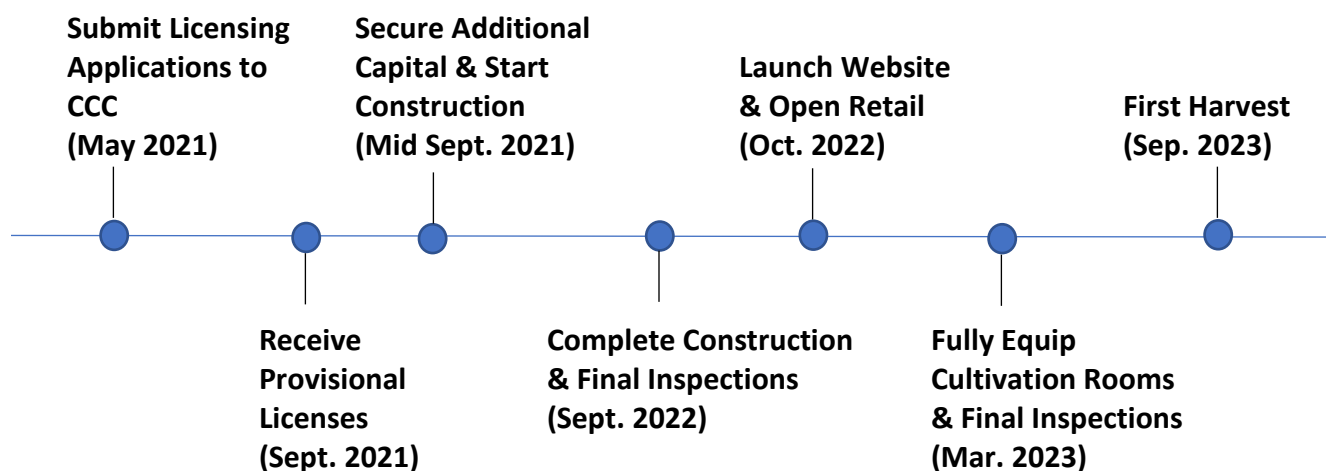
(CEO/Director of Operations)

Thomas is a Pittsfield native who has always resided in Berkshire County. He attended Porter and Chester Institute in Chicopee to receive an education in the electrical field. He has worked for one of the largest electrical contractors in the Berkshires for the past 6 years and earned his journeyman license. He currently attends Martin Electrical School and will be taking his test to earn his master electrical license this summer. In his spare time, Thomas uses his electrical skills to set up advanced, sustainable legal grow rooms. He is a certified installer for Trolmaster – an environmental controller for cultivation rooms. Through his experience in the electrical field, Thomas has grown passionate about reducing energy use and the carbon footprint that a cultivation creates.

Thomas has been a cannabis caregiver since 2014 and has been learning about the industry ever since. He has been cultivating for many years and has mastered advanced techniques to achieve the highest quality cannabis. He is knowledgeable in plant biology and is a self-taught breeder. Thomas looks forward to bringing his craft to the market.

PROPOSED TIMELINE

True East Leaf anticipates submitting their applications to the Cannabis Control Commission in May 2021. They estimate receiving their provisional licenses in September 2021. During this time, True East Leaf will be securing additional capital towards their project. They anticipate completing the building renovations and having final inspections take place in September 2022. Their website will be launched, and they will aim to open their retail storefront in October 2022. Approximately 6 months after opening and generating sales, True East Leaf will update their cultivation rooms with the highest quality standard of equipment with inspections anticipated for March 2023. They will then begin to grow, with their first harvest taking place in September 2023.



PLAN TO OBTAIN LIABILITY INSURANCE

True East Leaf LLC (“True East Leaf”) will be contracting with Budrisk insurance brokerage to 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 & \$2,000,000 in aggregate, annually. The deductible for each policy will be no higher than \$5,000 per occurrence.

FINAL REMARKS

The future is limitless for True East Leaf. After they are fully operational, they will add solar panels to the roof of their existing building. Utilizing solar panels will reduce the electricity needed to operate the facility. True East Leaf plans to expand their cultivation in the future by purchasing and revitalizing another commercial building. They will make it as sustainable and environmentally friendly as possible. They will aim to be leaders in the industry in energy efficiency.

Safety is the number one priority for all visitors and staff. True East Leaf will have extensive security cameras to cover all areas of the building. Aside from having surveillance systems, True East Leaf will also employ security guards to work in the storefront and to monitor parking.



Having a florist shop next door and a greenhouse across the street, True East Leaf will fit in seamlessly with the neighborhood. They look forward to bringing jobs to the city of Pittsfield and will prioritize hiring locally.

True East Leaf, LLC - Retail

RESTRICTING ACCESS TO AGE 21 OR OLDER

True East Leaf, LLC (“True East Leaf” or “the Company”) is a Marijuana Establishment as defined by 935 CMR 500.002. The Company sets forth the following policies and procedures for restricting access to marijuana and marijuana infused products to individuals over the age of twenty-one (21) pursuant to the Cannabis Control Commission’s (the “Commission”) regulations at 935 CMR 500.105(1)(p). This regulation states that written operating procedures for the Company shall include “[p]olicies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.”

A. COMPLIANCE WITH 935 CMR 500.105(1)(p)

The Company incorporates and adopts herein by reference, all of the provisions for the prevention of diversion outlined in the Company’s Standard Operating Procedure for the Prevention of Diversion. The provisions detailed in the Company’s Standard Operating Procedure for the Prevention of Diversion apply to the prevention of diversion of marijuana and marijuana infused products to all minors and all individuals under the age of twenty-one (21).

B. SPECIFIC PROVISIONS FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

As stated above, the Company incorporates herein, all provisions for the prevention of diversion of marijuana and marijuana infused product to individuals under the age of twenty-one (21) as detailed in the Company’s Standard Operating Procedure for the Prevention of Diversion. Specific provisions regarding restricting access to individuals age twenty-one (21) and older include the following:

1. The Company will only employ marijuana establishment agents, as defined by the Commission’s definitions at 935 CMR 500.002, who are at least twenty-one (21) years old.
2. Pursuant to 935 CMR 500.050(5), the Company will only allow consumers to enter the Marijuana Retail Establishment that are 21 years of age or older unless the establishment is co-located with a Medical Marijuana Treatment Center.
3. The Company will only allow visitors, age twenty-one (21) or older, at the Company’s facilities. The Company defines visitors in accordance with the Commission’s definitions at 935 CMR 500.002. The Company will designate an authorized agent to check the identification of all visitors entering the Company’s facilities and entry shall only be granted to those aged twenty-one (21) or older. Acceptable forms of currently valid identification include:
 - a. A motor vehicle license;
 - c. A government-issued identification card;
 - d. A government-issued passport; and
 - e. A United States-issued military identification card.

True East Leaf, LLC - Retail

QUALITY CONTROL AND TESTING

Pursuant to 935 CMR 500.160, True East Leaf, LLC (“True East Leaf” or “the Company”) will not sell or market any marijuana product that has not been tested by licensed Independent Testing Laboratories. Testing of marijuana products shall be performed by an Independent Testing Laboratory in compliance with the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products, as amended in November 2016 and published by the Massachusetts Department of Public Health. Every marijuana product sold will have a set of specifications which define acceptable quality limits for cannabinoid profile, residual solvents, metals, bacteria, and pesticides.

True East Leaf shall implement a written policy for responding to laboratory results that indicate contaminant levels that are above acceptable levels established in DPH protocols identified in 935 CMR 500.160(1) and subsequent notification to the Commission of such results. Results of any tests will be maintained by True East Leaf for at least one year. All transportation of marijuana to or from testing facilities shall comply with 935 CMR 500.105(13) and any marijuana product returned to True East Leaf by the testing facility will be disposed of in accordance with 935 CMR 500.105(12). True East Leaf shall never sell or market adult use marijuana products that have not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

True East Leaf’s policies include requirements for handling of marijuana, pursuant to 935 CMR 500.105(3), including sanitary measures that include, but are not limited to: hand washing stations; sufficient space for storage of materials; removal of waste; clean floors, walls and ceilings; sanitary building fixtures; sufficient water supply and plumbing; and storage facilities that prevent contamination. All True East Leaf staff will be trained and ensure that marijuana and marijuana products are handled with the appropriate food handling and sanitation standards. True East Leaf will ensure the proper equipment and storage materials, including adequate and convenient hand washing facilities; food-grade stainless steel tables; and temperature- and humidity- control storage units, refrigerators, and freezers.

True East Leaf’s Director of Compliance will provide quality control oversight over all marijuana products purchased from wholesale suppliers and sold to licensed adult-use cannabis retail establishments within the Commonwealth of Massachusetts. All True East Leaf staff will immediately notify the Director of Compliance of any actual or potential quality control issues, including marijuana product quality, facility cleanliness/sterility, tool equipment functionality, and storage conditions. All issues with marijuana products or the facility will be investigated and immediately rectified by the Director of Compliance, including measures taken, if necessary, to contain and dispose of unsafe products. The Director of Compliance will closely monitor product quality and consistency, and ensure expired products are removed and disposed.

All True East Leaf staff will receive relevant quality assurance training and provide quality assurance screening of marijuana flower, to ensure it is well cured and free of seeds, stems, dirt, and contamination, as specified in 935 CMR 500.105(3)(a), and meets the highest quality standards. All staff will wear gloves when handling marijuana and marijuana products, and exercise frequent hand washing and personal cleanliness, as specified in 935 CMR 500.105(2). Marijuana products will be processed in a secure access area of True East Leaf. All contact surfaces shall be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination, in compliance with 935 CMR 500.105(3)(b)(9).

In accordance with 935 CMR 500.105(3)(a), True East Leaf will ensure that only the leaves and flowers

True East Leaf, LLC - Retail

of the female marijuana plant are processed accordingly in a safe and sanitary manner as prescribed below:

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

True East Leaf management and inventory staff will continuously monitor quality assurance of marijuana products and processes, and prevent and/or mitigate any deficiencies, contamination, or other issues which could harm product safety.

Any spoiled, contaminated, dirty, spilled, or returned marijuana products are considered marijuana waste and will follow True East Leaf procedures for marijuana waste disposal, in accordance with 935 CMR 500.105(12). Marijuana waste will be regularly collected and stored in the secure-access, locked inventory vault.

Litter and waste shall be properly removed so as to minimize the development of odor and the potential for the waste attracting and harboring pests, pursuant to 935 CMR 500.105(12) and 935 CMR 500.105(3)(b)(5).

Pursuant to 935 CMR 500.105(11)(a)-(e), True East Leaf shall provide adequate lighting, ventilation, temperature, humidity, space and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110. True East Leaf will have a separate area for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, unless such products are destroyed. True East Leaf storage areas will be kept in a clean and orderly condition, free from infestations by insects, rodents, birds and any other type of pest. The True East Leaf storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.

True East Leaf will ensure all toxic items are identified, held, and stored in a manner that protects against contamination of marijuana, in accordance with 935 CMR 500.105(3)(b)(10). Pursuant to 935 CMR 500.105(3)(b)(15), storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination.

All testing results will be maintained by True East Leaf for no less than one year in accordance with 935 CMR 500.160(3).

Pursuant to 935 CMR 500.160(9), no marijuana product shall be sold or marketed for sale that has not first been tested and deemed to comply with the Independent Testing Laboratory standards.

True East Leaf shall notify the Commission within 72 hours of any laboratory testing results indicating contamination if contamination cannot be remediated and disposal of the production batch is necessary, in accordance with 935 CMR 500.160(2).

True East Leaf shall provide its employees with adequate, readily accessible toilet facilities, in accordance with 935 CMR 500.105(3)(b)(13).

True East Leaf - Retail

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

True East Leaf, LLC (“True East Leaf” or “the Company”) has drafted and instituted these personnel policies to provide equal opportunity in all areas of employment, including hiring, recruitment, training and development, promotions, transfers, layoff, termination, compensation, benefits, social and recreational programs, and all other conditions and privileges of employment, in accordance with applicable federal, state, and local laws. True East Leaf shall make reasonable accommodations for qualified individuals with demonstrated physical or cognitive disabilities, in accordance with all applicable laws. In accordance with 935 CMR 500.101(1)(c). and 935 CMR 500.101(1)(b), True East Leaf is providing these personnel policies, including background check policies, for its Marijuana Establishment.

Management is primarily responsible for seeing that equal employment opportunity policies are implemented, but all members of the staff share the responsibility for ensuring that, by their personal actions, the policies are effective and apply uniformly to everyone. Any employee, including managers, that True East Leaf determines to be involved in discriminatory practices are subject to disciplinary action and may be terminated. True East Leaf strives to maintain a work environment that is free from discrimination, intimidation, hostility, or other offenses that might interfere with work performance. In keeping with this desire, we will not tolerate any unlawful harassment of employees by anyone, including any manager, co-worker, vendor or clients.

In accordance with 935 CMR 500.105(1), General Operational Requirements for Marijuana Establishments, Written Operating Procedures, as a Marijuana Establishment, True East Leaf has and follows a set of detailed written operating procedures for each location. True East Leaf has developed and will follow a set of such operating procedures for each facility. True East Leaf’s operating procedures shall include, but are not necessarily limited to the following:

- (a) Security measures in compliance with 935 CMR 500.110;
- (b) Employee security policies, including personal safety and crime prevention techniques;
- (c) A description of the Marijuana Establishment’s hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000:*Adult Use of Marijuana*.
- (d) Storage of marijuana in compliance with 935 CMR 500.105(11);
- (e) 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
- (f) Price lists for Marijuana and Marijuana Products and any other available products, and alternate price list patients with documented Verification Financial Hardship, as defined in 935 CMR 501.002, as required by 935 CMR 501.100(1)(f);
- (g) Procedures to ensure accurate record-keeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
- (h) Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- (i) A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
- (j) Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- (k) Alcohol, smoke, and drug-free workplace policies;

True East Leaf - Retail

- (l) A plan describing how confidential information will be maintained;
- (m) A policy for the immediate dismissal of any marijuana establishment agent who has:
 - 1. Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
 - 2. Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
 - 3. 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.
- (n) A list of all board members and executives of a Marijuana Establishment, 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 the Marijuana Establishment's website, in compliance with 935 CMR 500.105(1)(n).
- (o) Policies and procedures for the handling of cash on Marijuana Establishment premises including but not limited to storage, collection frequency, and transport to financial institution(s).
- (p) Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- (q) Policies and procedures for energy efficiency and conservation that shall include:
 - 1. 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;
 - 2. Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - 3. Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
 - 4. Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.
- (r) Policies and procedures to promote workplace safety consistent with the standards set forth under the Occupational Safety and Health Act of 1970, 29 U.S.C. § 651, *et seq.*, including the general duty clause under 29 U.S.C. § 654, whereby:

Each employer (a) shall furnish to each of its employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to its employees; (b) shall comply with occupational safety and health standards promulgated under this act. Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to 29 U.S.C. § 651, *et seq.*, which are applicable to the employee's own actions and conduct.

This is applicable to all places of employment covered by 935 CMR 500.00: *Adult Use of Marijuana*.

True East Leaf - Retail

In accordance with 935 CMR 500.105(2), all of True East Leaf's current owners, managers and employees that are involved in the handling and sale of marijuana will successfully complete Responsible Vendor Training Program, and once designated a "responsible vendor" require all new employees involved in handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually and those not selling or handling marijuana may participate voluntarily. True East Leaf shall maintain records of responsible vendor training compliance at its principle place of business, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussion concerning marijuana effect on the human body; diversion prevention; compliance with tracking requirements; identifying acceptable forms of ID, including medical patient cards; key state and local laws; and such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program..

All employees of True East Leaf will be duly registered as marijuana establishment agents and have to complete a background check in accordance with 935 CMR 500.030(1). All marijuana establishment agents will complete a training course administered by True East Leaf and complete a Responsible Vendor Program in compliance with 935 CMR 500.105(2)(b). Employees will be required to receive a minimum of eight hours of on-going training annually pursuant to 935 CMR 500.105(2)(a).

1. At a minimum, marijuana establishment agents shall receive a total of eight hours of training annually. The eight-hour total training requirement shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent.
2. A minimum of four hours of training shall be from responsible vendor training program courses established under 935 CMR 500.105(2)(b). Any additional RVT hours over the four-hour RVT requirement may count toward the eight-hour total training requirement.
3. Non-RVT training may be conducted in-house by the Marijuana Establishment or by a third-party vendor engaged by the True East Leaf. Basic on-the-job training True East Leaf provides in the ordinary course of business may be counted toward the eight-hour total training requirement.
4. Agents responsible for tracking and entering product into the Seed-to-sale SOR shall receive training in a form and manner determined by the Commission. At a minimum, staff shall receive eight hours of on-going training annually.
5. True East Leaf shall maintain records of compliance with all training requirements noted above. Such records shall be maintained for four years and True East Leaf shall make such records available for inspection on request.

In accordance with 935 CMR 500.105 (9), General Operational Requirements for Marijuana Establishments, Record Keeping, True East Leaf's personnel records will be available for inspection by the Commission, upon request. True East Leaf's records shall be maintained in accordance with generally accepted accounting principles. Written records that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the following:

The following True East Leaf personnel records:

1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
2. A personnel record for each of True East Leaf's marijuana establishment agents. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with True East Leaf and shall include, at a minimum, the following:
 - a. all materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - b. documentation of verification of references;

True East Leaf - Retail

- c. the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
 - d. 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;
 - e. documentation of periodic performance evaluations;
 - f. a record of any disciplinary action taken; and
 - g. notice of completed responsible vendor and eight-hour related duty training.
3. A staffing plan that will demonstrate accessible business hours and safe conditions;
4. Personnel policies and procedures, including, at minimum, the following:
 - a. Code of ethics;
 - b. Whistle-blower policy; and
 - c.
5. All background check reports obtained in accordance with M.G.L. c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00:*Criminal Offender Record Information (CORI)*..

Following closure of a Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission. True East Leaf understands that in the event that True East Leaf were to close, all records will be kept for at least two years at the expense of True East Leaf.

True East Leaf - Retail

RECORD KEEPING PROCEDURES

True East Leaf, LLC (“True East Leaf” or “the Company”) records shall be available to the Cannabis Control Commission (“CCC”) upon request pursuant to 935 CMR 500.105(9). True East Leaf shall maintain records in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection, in addition to written operating procedures as required by 935 CMR 500.105(1), inventory records as required by 935 CMR 500.105(8) and seed-to-sale tracking records for all marijuana products are required by 935 CMR 500.105(8)(e).

Personnel records will also be maintained, in accordance with 935 CMR 500.105(9)(d), including but not limited to job descriptions and/or employment contracts each employee, organizational charts, staffing plans, periodic performance evaluations, verification of references, employment contracts, documentation of all required training, including training regarding privacy and confidentiality agreements and the signed statement confirming the date, time and place that training was received, record of disciplinary action, notice of completed responsible vendor training and eight-hour duty training, personnel policies and procedures, and background checks obtained in accordance with 935 CMR 500.030. Personnel records will be maintained for at least 12 months after termination of the individual’s affiliation with True East Leaf, in accordance with 935 CMR 500.105(9)(d)(2). Additionally, business records will be maintained in accordance with 935 CMR 500.105(9)(e) as well as waste disposal records pursuant to 935 CMR 500.105(9)(f), as required under 935 CMR 500.105(12). True East Leaf shall keep these waste records for at least three years, in accordance with 935 CMR 500.105(12).

PERSONNEL RECORDS

Pursuant to 935 CMR 500.105(9)(d), the following personnel records shall be maintained:

1. Job description for each agent;
2. A personnel record for each agent;
3. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
4. Personnel policies and procedures; and
5. All background check reports obtained in accordance with 935 CMR 500.030

BUSINESS RECORDS

Pursuant to 935 CMR 500.105(9)(d), the following personnel records shall be maintained:

6. Job description for each agent;
7. A personnel record for each agent;
8. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
9. Personnel policies and procedures; and
10. All background check reports obtained in accordance with 935 CMR 500.030

VISITOR LOG

True East Leaf will maintain a visitor log that documents all authorized visitors to the facility, including outside vendors, contractors, and visitors, in accordance with 935 CMR 500.110(4)(e). All visitors must show proper identification and be logged in and out; that log shall be available for inspection by the Commission at all times.

REAL-TIME INVENTORY RECORDS

True East Leaf will maintain real-time inventory records, including at minimum, an inventory of all marijuana and marijuana products received from wholesalers, ready for sale to wholesale customers, and

True East Leaf - Retail

all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal, in accordance with 935 CMR 500.105(8). Real-time inventory records may be accessed via METRC, the Commonwealth's seed-to-sale tracking software of record. True East Leaf will continuously maintain hard copy documentation of all inventory records. The record of each inventory shall include, at a minimum, the date of inventory, a summary of inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

MANIFESTS

True East Leaf will maintain records of all manifests for no less than one year and make them available to the Commission upon request, in accordance with 935 CMR 500.105(f). Manifests will include, at a minimum, the originating Licensed Marijuana Establishment Agent's (LME) name, address, and registration number; the names and registration number of the marijuana establishment agent who transported the marijuana products; the names and registration number of the marijuana establishment agent who prepared the manifest; the destination LME name, address, and registration number; a description of marijuana products being transported, including the weight and form or type of product; the mileage of the transporting vehicle at departure from origination LME and the mileage upon arrival at the destination LME, as well as the mileage upon returning to the originating LME; the date and time of departure from the originating LME and arrival at destination LME; a signature line for the marijuana establishment agent who receives the marijuana; the weight and inventory before departure and upon receipt; the date and time that the transported products were re-weighted and re-inventoried; and the vehicle make, model, and license plate number. True East Leaf will maintain records of all manifests.

INCIDENT REPORTS

True East Leaf will maintain incident reporting records notifying appropriate law enforcement authorities and the Commission about any breach of security immediately, and in no instance, more than 24 hours following the discovery of the breach, in accordance with 935 CMR 500.110(7). Incident reporting notification shall occur, but not be limited to, during the following occasions: discovery of discrepancies identified during inventory; diversion, theft, or loss of any marijuana product; any criminal action involving or occurring on or in the Marijuana Establishment premises; and suspicious act involving the sale, cultivation, distribution, processing or production of marijuana by any person; unauthorized destruction of marijuana; any loss or unauthorized alteration of records relating to marijuana; an alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the Marijuana Establishment; the failure of any security alarm due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours; or any other breach of security.

True East Leaf shall, within ten calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110(7)(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. True East Leaf shall maintain all documentation relating to an incident for not less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities upon request.

TRANSPORTATION LOGS

In the event that True East Leaf operates its own vehicle to transport marijuana products, it will maintain a transportation log of all destinations traveled, trip dates and times, starting and ending mileage of each

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trip, and any emergency stops, including the reason for the stop, duration, location, and any activities of personnel existing the vehicle, as required by 935 CMR 500.115(13). True East Leaf shall retain all transportation logs for no less than a year and make them available to the Commission upon request.

SECURITY AUDITS

True East Leaf will, on an annual basis, obtain at its own expense, a security system audit by a vendor approved by the Commission, in accordance with 935 CMR 500.110(8). A report of the audit will be submitted, in a form and manner determined by the Commission, no later than 30 calendar days after the audit is conducted. If the audit identifies concerns related to True East Leaf's security system, True East Leaf will also submit a plan to mitigate those concerns within ten business days of submitting the audit.

CONFIDENTIAL RECORDS

True East Leaf will ensure that all confidential information, including but not limited to employee personnel records, financial reports, inventory records and manifests, business plans, and other documents are kept safeguarded and private, in accordance with 935 CMR 500.105(1)(k). All confidential hard copy records will be stored in lockable filing cabinets within the Director of Compliance's Office. No keys or passwords will be left in locks, doors, in unrestricted access areas, unattended, or otherwise left accessible to anyone other than the responsible authorized personnel. All confidential electronic files will be safeguarded by a protected network and password protections, as appropriate and required by the Commission. All hard copy confidential records will be shredded when no longer needed.

Following the closure of the Marijuana Establishment, all records will be kept for at least two years at True East Leaf's sole expense and in a form and location acceptable to the Commission, pursuant to 935 CMR 500.105(9)(g).

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MAINTAINING OF FINANCIAL RECORDS

True East Leaf, LLC (“True East Leaf” or “the Company”) policy is to maintain financial records in accordance with 935 CMR 500.105(9)(e). The records will include manual or computerized records of assets and liabilities, monetary transactions; books of accounts, which shall 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, stipends paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the non-profit corporation.

Furthermore, True East Leaf will implement the following policies for Recording Sales:

- (a) True East Leaf will utilize a point-of-sale (“POS”) system approved by the Commission, in consultation with the Massachusetts Department of Revenue (“DOR”).
- (b) True East Leaf may also utilize a sales recording module approved by the DOR.
- (c) True East Leaf will not utilize any software or other methods to manipulate or alter sales data at any time or under any circumstances.
- (d) True East Leaf will conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. True East Leaf will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If True East Leaf 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:
 - i. it will immediately disclose the information to the Commission;
 - ii. it will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
 - iii. take such other action directed by the Commission to comply with 935 CMR 500.105.
- (e) True East Leaf will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.
- (f) True East Leaf will adopt separate accounting practices at the POS for marijuana and marijuana product sales, and non-marijuana sales.
- (g) True East Leaf will allow the Commission and the DOR audit and examine the POS system used by a retailer in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.140(5).

Following the closure of True East Leaf, all records will be kept for at least two years, at True East Leaf’s sole expense, and in a form and location acceptable to the Commission, in accordance with 935 CMR 500.105(9)(g). True East Leaf shall keep financial records for a minimum of three years from the date of the filed tax return, in accordance with 830 CMR 62C.25.1(7) and 935 CMR 500.140(5).

True East Leaf, LLC - Retail

QUALIFICATIONS AND TRAINING

True East Leaf, LLC (“True East Leaf” or “the Company”) shall, pursuant to 935 CMR 500.105(2)(a), ensure that all marijuana establishment agents complete training prior to performing job functions. Training will be tailored to the role and responsibilities of the job function. Marijuana Establishment agents will be trained for one week before acting as an agent. At a minimum, staff shall receive eight hours of on-going training annually. New marijuana establishment agents will receive employee orientation prior to beginning work with True East Leaf. Each department manager will provide orientation for agents assigned to their department. Orientation will include a summary overview of all the training modules.

In accordance with 935 CMR 500.105(2)(b), all current owners, managers and employees of True East Leaf that are involved in the handling and sale of marijuana will successfully complete Responsible Vendor Training Program, and once designated a “responsible vendor” require all new employees involved in handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually and those not selling or handling marijuana may participate voluntarily. True East Leaf shall maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussion concerning marijuana’s effects on the human body; diversion prevention; compliance with seed-to-sale tracking requirements; identifying acceptable forms of ID demonstrating the age of majority (21+); and key state and local laws.

All of True East Leaf’s employees will be registered as marijuana establishment agents, in accordance with 935 CMR 500.030. All True East Leaf employees will be duly registered as marijuana establishment agents and have to complete a background check in accordance with 935 CMR 500.030(1). All registered agents of True East Leaf shall meet suitability standards of 935 CMR 500.800.

Training will be recorded and retained in the marijuana establishment agents’ files. True East Leaf shall retain all training records for four (4) years as required by 935 CMR 500.105(s). All marijuana establishment agents will have continuous quality training and a minimum of 8 hours annual on-going training.

Energy Compliance Plan

True East Leaf, LLC (“True East Leaf” or the “Company”) will work with our architect and engineer to identify and as many energy saving strategies as possible. In addition, True East Leaf will implement, as much as is feasible, the following energy saving strategies:

- Increasing or adding insulation.
- Installing ‘smart’ thermostats to identify periods where heating/cooling loads can be reduced
- Installing LED lighting
- Ensuring that the restrooms use low flow toilets and sinks.
- Coordinating with the HVAC contractor to identify any energy saving opportunities.
- Evaluating the efficacy of switching the kitchen(s) in the space to on-demand hot water heaters.
- Installing Photovoltaic panels
- Increase daylight into work areas
- Minimize night work
- Source raw materials only from suppliers that also implement energy saving measures
- Install bike racks to encourage bike use by employees
- Sustainable packaging of products
- Recycling

In the future, any replacements or upgrades of heating/cooling, lighting, and plumbing will include energy efficiency as part of its criteria for evaluation.

True East Leaf will investigate rooftop solar arrays to generate electricity, and rooftop solar hot water to provide both hot water and heat for the space.

True East Leaf acknowledges that if a Provisional License is issued, True East Leaf, at the Architectural Review stage, will submit further information to demonstrate actual consideration of energy reduction opportunities, use of renewable energy and renewable energy generation, including a list of opportunities that were considered and information that demonstrates actual engagement with energy efficiency programs and any financial incentives received. This information will include whether opportunities are being implemented, will be implemented at a later date, or are not planned to be implemented.

True East Leaf will also include a summary of information that was considered to make the decision (i.e. costs, available incentives, and bill savings). True East Leaf will engage in either a Mass Save audit or coordinate with our local municipal electric company to conduct an audit, which will be included in the summary.

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As part of our written operating procedures we will conduct an annual energy audit and request regular meetings with our municipal utilities to identify energy efficiency programs, incentives, opportunities, and areas for True East Leaf to optimize its energy usage.

True East Leaf is committed to considering how to optimally use energy early in the facility design process and continually assess new opportunities for reduced energy usage and costs. True East Leaf will use best management practices to reduce energy and water usage, engage in energy consideration, and mitigate other environmental impacts.

True East Leaf will meet all applicable environmental laws and regulations; receive permits and other applicable approvals, including those related to water quality and solid and hazardous waste management, as a requirement of obtaining a final license.

True East Leaf LLC

DIVERSITY PLAN

True East Leaf, LLC (“True East Leaf” or the “Company”) is committed to actively promoting diversity, inclusion, and cultural competency, by implementing programmatic and operational procedures and policies that will help to make True East Leaf a leader and champion of diversity, both locally and throughout the broader Massachusetts cannabis industry.

Town Specific Data - According to 2010 Census information, the City of Pittsfield, has approximately 42,766 people. 52.6% of the population is Female and 47.4% are Male. Of the total population 78.4% are 21 years or older. The population is 86.8% White, 6.8% Hispanic, 2% Asian alone, and 4.5% Black alone.

True East Leaf’s commitment to diversity is reflected in the following Goal, which will be pursued through the Programs outlined herein, and the progress of which shall be judged by the Measurements/Metrics as stated below, and adjusted as needed if necessary:

Goal:

- Achieve at least 25% of our staffing needs from women
- Achieve at least 10% of our staffing needs from people of color
- Achieve at least 5% of our staffing needs from Veterans
- Achieve at least 5% of our staffing needs from persons with disabilities
- Achieve at least 10% of our staffing needs from LGBTQ+ people

Programs to Achieve Diversity Goal:

- Provide on-site interactive workshops, once a year at True East Leaf’s Establishment at a date and time determined by True East Leaf management. The workshop will cover such topics as the prevention of sexual harassment, racial and cultural diversity, and methods of fostering an inclusive work atmosphere.
- Increase diversity of the make-up of our staff by actively seeking out individuals from the aforementioned groups both through in-house hiring initiatives and participation in online diversity job boards (such as *Professional Diversity Network*, *Diversity Jobs*, *Beyond.com*) and in-person job fairs at least once a year and as frequently as needed as staffing needs dictate.
- Establish clearly written policies regarding diversity and a zero-tolerance policy for discrimination and/or sexual harassment, which shall be incorporated into our employee handbook.

Measurements:

- *Qualitative Metrics*: Perform annual evaluation of inclusion/diversity initiatives to ensure diversity is one of True East Leaf’s strengths and remains a primary focus. This may include anonymous employee surveys or other private submission opportunities so that we can attempt to avoid any sort of reluctance for our employees to inform management how we are truly doing in pursuit of our diversity plan goals. The results of the surveys shall be compared to prior years’ results to allow True East Leaf to adjust our programs in the event that our goals are not being achieved.
- *Quantitative Metrics*: We will strive to achieve at least the stated percentages listed above for our staffing needs from women, people of color, LGBTQ+, persons with disabilities and Veterans.
- The personnel files shall be evaluated on a semi-annual basis to determine how many employees

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are from the 5 aforementioned groups that occupy positions within the company and that number shall be divided by True East Leaf's total staffing at its facility to determine the percentage achieved.

Is our goal objectively reasonable?

True East Leaf's goal of hiring the listed percentages above for the staffing needs at our Establishment is objectively reasonable because of the facts (the demographics listed in the paragraph above) and our ability to advertise job positions quarterly in several of the following publications: *Professional Diversity Network*, *Diversity Jobs*, *Beyond.com*.

True East Leaf acknowledges that the progress or success of our plan will be documented upon renewal (one year from provisional licensure, and each year thereafter).

True East Leaf 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 Marijuana Establishments.

True East Leaf acknowledges that any actions taken, or programs instituted will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.