



Massachusetts Cannabis Control Commission

Marijuana Product Manufacturer

General Information:

License Number: MP282173
Original Issued Date: 08/01/2022
Issued Date: 08/01/2022
Expiration Date: 08/01/2023

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: TSC Operations, LLC

Phone Number: 508-494-5238 Email Address: ryan@topshelfcannaseurs.com

Business Address 1: 56 Industrial Dr.

Business Address 2: Units A and B

Business City: Uxbridge

Business State: MA

Business Zip Code: 01569

Mailing Address 1: 25 Harriman Rd.

Mailing Address 2:

Mailing City: Hudson

Mailing State: MA

Mailing Zip Code: 01749

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 63

Percentage Of Control: 63

Role: Manager

Other Role:

First Name: Daryl

Last Name: Heller

Suffix:

Gender: Male	User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)	
Specify Race or Ethnicity:	

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 14.43	Percentage Of Control: 14.43	
Role: Manager	Other Role:	
First Name: Ryan	Last Name: Cohen	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 14.43	Percentage Of Control: 14.43	
Role: Manager	Other Role:	
First Name: Scott	Last Name: Bulkeley	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 4

Percentage Of Ownership:	Percentage Of Control:	
Role: Manager	Other Role:	
First Name: Robert	Last Name: Brandt	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 5

Percentage Of Ownership:	Percentage Of Control:	
Role: Manager	Other Role:	
First Name: Jay	Last Name: Haller	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 6

Percentage Of Ownership:	Percentage Of Control:	
Role: Manager	Other Role:	
First Name: Barry	Last Name: Rynearson	Suffix:
Gender: Male	User Defined Gender:	
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)		
Specify Race or Ethnicity:		

Person with Direct or Indirect Authority 7

Percentage Of Ownership:	Percentage Of Control:	
Role: Manager	Other Role:	
Date generated: 09/01/2022		

First Name: Andrew Last Name: Brown Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 8

Percentage Of Ownership: Percentage Of Control:
Role: Manager Other Role:
First Name: John Last Name: Brueck Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 9

Percentage Of Ownership: Percentage Of Control:
Role: Manager Other Role:
First Name: Samir Last Name: Lteif Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: Middle Eastern or North African (Lebanese, Iranian, Egyptian, Syrian, Moroccan, Algerian)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 10

Percentage Of Ownership: Percentage Of Control:
Role: Manager Other Role:
First Name: David Last Name: Prill Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 100 Percentage of Ownership: 100
Entity Legal Name: TSC Holdings Group, LLC Entity DBA: DBA
City:
Entity Description: Parent holding entity
Foreign Subsidiary Narrative:
Entity Phone: 717-979-0567 Entity Email: Entity Website:
brynearson@hellercg.com
Entity Address 1: 56 Industrial Drive Entity Address 2:
Entity City: Uxbridge Entity State: MA Entity Zip Code: 01569
Entity Mailing Address 1: 56 Industrial Drive Entity Mailing Address 2:
Entity Mailing City: Uxbridge Entity Mailing State: MA Entity Mailing Zip Code:
01569
Relationship Description: Has direct control over TSC Operations, LLC, as 100% owner of TSC Operations, LLC.

Entity with Direct or Indirect Authority 2

Percentage of Control: 63		Percentage of Ownership: 63	
Entity Legal Name: Heller Investment Holdings, LLC		Entity DBA:	DBA City:
Entity Description: Parent company of TSC Investment Group, LLC			
Foreign Subsidiary Narrative:			
Entity Phone: 717-629-1559	Entity Email: dheller@hellercg.com	Entity Website:	
Entity Address 1: 2055 Crooks Rd	Entity Address 2: Suite B		
Entity City: Rochester Hills	Entity State: MI	Entity Zip Code: 48309	
Entity Mailing Address 1: 2055 Crooks Rd	Entity Mailing Address 2: Suite B		
Entity Mailing City: Rochester Hills	Entity Mailing State: MI	Entity Mailing Zip Code: 48309	
Relationship Description: Has direct control over TSC Operations, LLC as an entity Manager of TSC Operations, LLC.			
Additionally has indirect control over TSC Operations, LLC as 100% owner of TSC Investment Group LLC, which is in turn a 63.00% owner of TSC Holdings, LLC, which is in turn a 100% owner of TSC Operations, LLC, the proposed license holding entity.			

Entity with Direct or Indirect Authority 3

Percentage of Control: 37		Percentage of Ownership: 37	
Entity Legal Name: Top Shelf Cannaseurs LLC		Entity DBA:	DBA City:
Entity Description: 37.00% owner of TSC Holdings, LLC			
Foreign Subsidiary Narrative:			
Entity Phone: 508-494-5238	Entity Email: ryan@topshelfcannaseurs.com	Entity Website:	
Entity Address 1: 56 Industrial Dr	Entity Address 2:		
Entity City: Uxbridge	Entity State: MA	Entity Zip Code: 01569	
Entity Mailing Address 1: 56 Industrial Dr	Entity Mailing Address 2:		
Entity Mailing City: Uxbridge	Entity Mailing State: MA	Entity Mailing Zip Code: 01569	
Relationship Description: Has indirect control through 37.00% ownership interest in TSC Holdings, LLC which has a 100% ownership interest in TSC Operations, LLC.			

Entity with Direct or Indirect Authority 4

Percentage of Control: 63		Percentage of Ownership: 63	
Entity Legal Name: TSC Investment Group, LLC		Entity DBA:	DBA City:
Entity Description: Part-owner of TSC Holdings, LLC			
Foreign Subsidiary Narrative:			
Entity Phone: 773-369-2652	Entity Email: dprill@gloriouscanna.com	Entity Website:	
Entity Address 1: 415 North Prince St.	Entity Address 2: Suite 300		
Entity City: Lancaster	Entity State: PA	Entity Zip Code: 17603	
Entity Mailing Address 1: 1500 Main St.	Entity Mailing Address 2: Suite 2700		
Entity Mailing City: Springfield	Entity Mailing State: MA	Entity Mailing Zip Code: 01115	
Relationship Description: Has indirect control through 63.00% ownership interest in TSC Holdings, LLC which has a 100% ownership			

interest in TSC Operations, LLC.

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: TSC Investment Group LLC **Entity DBA:**

Email: dprill@gloriouscanna.com **Phone:** 773-369-2652

Address 1: 415 North Prince St. **Address 2:**

City: Lancaster **State:** PA **Zip Code:** 17603

Types of Capital: Monetary/Equity **Other Type of Capital:** **Total Value of Capital Provided:** \$500000 **Percentage of Initial Capital:** 100

Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Business Interest in Other State 1

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: Daryl **Owner Last Name:** Heller **Owner Suffix:**

Entity Legal Name: Tycoon I Operations, LLC **Entity DBA:**

Entity Description: Cannabis cultivator in Michigan.

Entity Phone: 773-369-2652 **Entity Email:** **Entity Website:**
dprill@gloriouscanna.com

Entity Address 1: 2055 Crooks Rd **Entity Address 2:** Ste B

Entity City: Rochester Hills **Entity State:** MI **Entity Zip Code:** 48309 **Entity Country:** USA

Entity Mailing Address 1: 2055 Crooks Rd **Entity Mailing Address 2:** Ste B

Entity Mailing City: Rochester Hills **Entity Mailing State:** MI **Entity Mailing Zip Code:** 48309 **Entity Mailing Country:** USA

Business Interest in Other State 2

Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner

Owner First Name: Heller Investment Holdings, LLC **Owner Last Name:** **Owner Suffix:**

Entity Legal Name: Tycoon I Operations, LLC **Entity DBA:**

Entity Description: Cannabis cultivator in Michigan.

Entity Phone: 773-369-2652 **Entity Email:** **Entity Website:**
dprill@gloriouscanna.com

Entity Address 1: 2055 Crooks Rd **Entity Address 2:** Ste B

Entity City: Rochester Hills **Entity State:** MI **Entity Zip Code:** 48309 **Entity Country:** USA

Entity Mailing Address 1: 2055 Crooks Rd **Entity Mailing Address 2:** Ste B

Entity Mailing City: Rochester Hills **Entity Mailing State:** MI **Entity Mailing Zip Code:** 48309 **Entity Mailing Country:** USA

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Ryan **Last Name:** Cohen **Suffix:**

Date generated: 09/01/2022

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Marijuana Establishment Name: TSC Delivery LLC Business Type: Other
Marijuana Establishment City: Hudson Marijuana Establishment State: MA

Individual 2

First Name: Ryan Last Name: Cohen Suffix:
Marijuana Establishment Name: Top Shelf Cannaseurs, LLC Business Type: Marijuana Cultivator
Marijuana Establishment City: Hudson Marijuana Establishment State: MA

Individual 3

First Name: Ryan Last Name: Cohen Suffix:
Marijuana Establishment Name: Top Shelf Cannaseurs, LLC Business Type: Marijuana Product Manufacture
Marijuana Establishment City: Hudson Marijuana Establishment State: MA

Individual 4

First Name: Scott Last Name: Bulkeley Suffix:
Marijuana Establishment Name: Top Shelf Cannaseurs, LLC Business Type: Marijuana Cultivator
Marijuana Establishment City: Hudson Marijuana Establishment State: MA

Individual 5

First Name: Scott Last Name: Bulkeley Suffix:
Marijuana Establishment Name: Top Shelf Cannaseurs, LLC Business Type: Marijuana Product Manufacture
Marijuana Establishment City: Hudson Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 56 Industrial Drive
Establishment Address 2: Units A and B
Establishment City: Uxbridge Establishment Zip Code: 01569
Approximate square footage of the Establishment: 40000 How many abutters does this property have?: 10
Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	2022-02-11 TSC Operations LLC - Plan to Remain Compliant with Local Zoning.pdf	pdf	6206e25c25efbc0893014140	02/11/2022
Community Outreach Meeting Documentation	2022-02-10 TSC Operations LLC - Community Outreach Meeting Attestation.pdf	pdf	620b266d8d09e508d6119053	02/14/2022
Certification of Host Community Agreement	2022-01-12 TSC Operations LLC - HCA Certification Form (Fixed Date).pdf	pdf	621fef0132b90c07941a5c9c	03/02/2022

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
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Plan for Positive Impact	2022-01-06 TSC Operations LLC - Big Hope Letter of Donation Acceptance.pdf	pdf	621ff0cee449f407967d9d5b	03/02/2022
Other	2022-04-08 TSC Operations LLC - Updated Letter from NEVA.pdf	pdf	625049385e562200081ae20c	04/08/2022
Plan for Positive Impact	2022-04-08 TSC Operations LLC - Updated Positive Impact Plan.pdf	pdf	62504b025e562200081ae9d9	04/08/2022

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Manager Other Role:
 First Name: Daryl Last Name: Heller Suffix:
 RMD Association: Not associated with an RMD
 Background Question: no

Individual Background Information 2

Role: Manager Other Role:
 First Name: Ryan Last Name: Cohen Suffix:
 RMD Association: Not associated with an RMD
 Background Question: yes

Individual Background Information 3

Role: Manager Other Role:
 First Name: Robert Last Name: Brandt Suffix:
 RMD Association: Not associated with an RMD
 Background Question: no

Individual Background Information 4

Role: Manager Other Role:
 First Name: Jay Last Name: Haller Suffix:
 RMD Association: Not associated with an RMD
 Background Question: no

Individual Background Information 5

Role: Manager Other Role:
 First Name: Barry Last Name: Ryneerson Suffix:
 RMD Association: Not associated with an RMD
 Background Question: no

Individual Background Information 6

Role: Manager Other Role:
 First Name: Andrew Last Name: Brown Suffix:
 RMD Association: Not associated with an RMD
 Background Question: no

Individual Background Information 7

Role: Manager Other Role:
First Name: Scott Last Name: Bulkeley Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 8

Role: Manager Other Role:
First Name: Samir Last Name: Lteif Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 9

Role: Manager Other Role:
First Name: David Last Name: Prill Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 10

Role: Manager Other Role:
First Name: John Last Name: Brueck Suffix:
RMD Association: Not associated with an RMD
Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company Other Role:
Entity Legal Name: TSC Holdings Group, LLC Entity DBA:
Entity Description: Parent holding entity
Phone: 717-979-0567 Email: brynearson@hellercg.com
Primary Business Address 1: 56 Industrial Drive Primary Business Address 2:
Primary Business City: Uxbridge Primary Business State: MA Principal Business Zip Code: 01749
Additional Information:

Entity Background Check Information 2

Role: Investor/Contributor Other Role:
Entity Legal Name: Heller Investment Holdings, LLC Entity DBA:
Entity Description: Parent company of TSC Investment Group, LLC
Phone: 717-629-1559 Email: dheller@hellercg.com
Primary Business Address 1: 2055 Crooks Rd Primary Business Address 2: Suite B
Primary Business City: Rochester Hills Primary Business State: MI Principal Business Zip Code: 48309
Additional Information:

Entity Background Check Information 3

Role: Partner Other Role:
Entity Legal Name: Top Shelf Cannaseurs LLC Entity DBA:
Entity Description: 37.00% owner of TSC Holdings, LLC

Phone: 508-494-5238 Email: ryan@topshelfcannaseurs.com

Primary Business Address 1: 56 Industrial Dr Primary Business Address 2:

Primary Business City: Uxbridge Primary Business State: MA Principal Business Zip Code: 01569

Additional Information:

Entity Background Check Information 4

Role: Partner Other Role:

Entity Legal Name: TSC Investment Group, LLC Entity DBA:

Entity Description: Part-owner of TSC Holdings, LLC

Phone: 773-369-2652 Email: dprill@gloriouscanna.com

Primary Business Address 1: 415 North Prince St. Primary Business Address 2: Suite 300

Primary Business City: Lancaster Primary Business State: PA Principal Business Zip Code: 17603

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	2022-02-10 TSC Operations LLC - DUA Attestation.pdf	pdf	6206e74adc96b108e551c7e7	02/11/2022
Secretary of Commonwealth - Certificate of Good Standing	2022-01-14 TSC Operations LLC - SOC Certificate of Good Standing.pdf	pdf	6206e74cea0b000858e8d7ca	02/11/2022
Department of Revenue - Certificate of Good standing	2022-01-14 TSC Operations LLC - DOR Certificate of Good Standing.pdf	pdf	6206e74da828d708f051412e	02/11/2022
Bylaws	2022-02-14 TSC Operations LLC - Operating Agreement.pdf	pdf	620b22928dbcc30906640708	02/14/2022

No documents uploaded

Massachusetts Business Identification Number: 001548795

Doing-Business-As Name: Glorious Cannabis

DBA Registration City: Uxbridge

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	2022-02-10 TSC Operations LLC - Business Plan.pdf	pdf	6206e7e2d04772090d5a6a02	02/11/2022
Plan for Liability Insurance	2022-02-07 TSC Operations LLC - Plan to Obtain Liability Insurance.pdf	pdf	6206e82e35cb3e08f7221858	02/11/2022
Proposed Timeline	2022-04-08 TSC Operations LLC - Updated Proposed Timeline.pdf	pdf	625048315e562200081add26	04/08/2022

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload
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					Date
Sample of unique identifying marks used for branding	2022-02-10 TSC Operations LLC - Unique Mark for Branding.png	png	6206ef8b879c73091c81a84a		02/11/2022
Energy Compliance Plan	2022-02-11 TSC Operations LLC - Energy Compliance Plan.pdf	pdf	6206efd08d09e508d61186dc		02/11/2022
Inventory procedures	2022-02-11 TSC Operations LLC - Inventory Procedures.pdf	pdf	6206efd15099080851f3a4f6		02/11/2022
Maintaining of financial records	2022-02-11 TSC Operations LLC - Maintaining of Financial Records.pdf	pdf	6206efd2d3dbc608cffa96ae		02/11/2022
Method used to produce products	2022-02-11 TSC Operations LLC - Methods Used to Produce Products.pdf	pdf	6206efd3e95b8c088881960a		02/11/2022
Personnel policies including background checks	2022-02-11 TSC Operations LLC - Personnel Policies Including Background Checks.pdf	pdf	6206efd48dbcc3090663fde7		02/11/2022
Plan to Obtain Marijuana	2022-02-11 TSC Operations LLC - Plan for Obtaining Marijuana or Marijuana Products.pdf	pdf	6206eff9d04772090d5a6a0c		02/11/2022
Prevention of diversion	2022-02-11 TSC Operations LLC - Prevention of Diversion.pdf	pdf	6206effdea5b88086e773af8		02/11/2022
Qualifications and training	2022-02-11 TSC Operations LLC - Qualifications and Training.pdf	pdf	6206f0018d09e508d61186e0		02/11/2022
Quality control and testing	2022-02-11 TSC Operations LLC - Quality Control and Testing.pdf	pdf	6206f004a828d708f0514139		02/11/2022
Record Keeping procedures	2022-02-11 TSC Operations LLC - Recordkeeping Procedures.pdf	pdf	6206f008d04772090d5a6a10		02/11/2022
Restricting Access to age 21 and older	2022-02-11 TSC Operations LLC - Restricting Access to 21 or Older.pdf	pdf	6206f01935cb3e08f7221860		02/11/2022
Safety Plan for Manufacturing	2022-02-11 TSC Operations LLC - Safety Plan.pdf	pdf	6206f01a25efbc089301417a		02/11/2022
Security plan	2022-02-11 TSC Operations LLC - Security Plan.pdf	pdf	6206f01b879c73091c81a84e		02/11/2022
Storage of marijuana	2022-02-11 TSC Operations LLC - Storage of Marijuana.pdf	pdf	6206f01c71cb7908795931a4		02/11/2022
Transportation of marijuana	2022-02-11 TSC Operations LLC - Transportation of Marijuana.pdf	pdf	6206f01c8d09e508d61186e4		02/11/2022
Types of products Manufactured.	2022-02-11 TSC Operations LLC - Types & Forms of Product.pdf	pdf	6206f025d3dbc608cffa96b2		02/11/2022
Diversity plan	2022-03-17 TSC Operations LLC - Updated Diversity Plan.pdf	pdf	6233617e4dd71307b79d1582		03/17/2022

ATTESTATIONS

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

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

Marijuana Establishment including capital that is in the form of land or buildings.: I Agree

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

I Agree

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS

No records found

HOURS OF OPERATION

Monday From: Open 24 Hours	Monday To: Open 24 Hours
Tuesday From: Open 24 Hours	Tuesday To: Open 24 Hours
Wednesday From: Open 24 Hours	Wednesday To: Open 24 Hours
Thursday From: Open 24 Hours	Thursday To: Open 24 Hours
Friday From: Open 24 Hours	Friday To: Open 24 Hours
Saturday From: Open 24 Hours	Saturday To: Open 24 Hours
Sunday From: Open 24 Hours	Sunday To: Open 24 Hours

TSC Operations, LLC

Adult Use Marijuana Establishment for Product Manufacturing
56 Industrial Drive, Uxbridge, Mass., Worcester County
Assessor ID 40-4659

Plan to Remain Compliant with Local Permits and Zoning

TSC Operations, LLC (the Applicant), is seeking a marijuana product manufacturing establishment at 56 Industrial Drive in the Town of Uxbridge and the site is located within the Town's Industrial B (IB) zoning district and this marijuana use is allowed as of right, by building permit, in this zone.

The Applicant is committed to remaining compliant with all applicable zoning bylaws of the Town of Uxbridge, MA, including, but not limited to Chapter 400, ZONING BYLAWS, §400-23. Pursuant to §400-23(B)(1), Applicant has secured a Host Community Agreement with the Town of Uxbridge. Applicant's cultivation and production facility is to be located at 56 Industrial Drive, Uxbridge, MA 01569, which falls within the Industrial B zoning district, and which complies with the requirements of §400-23(B)(2). Pursuant to §400-23(B)(3), Applicant's facility does not violate the 750-foot minimum distance buffer required between a marijuana establishment and a public/private school serving grades K-12. Applicant shall remain compliant with all applicable zoning requirements, both those enumerated herein that are specifically applicable to marijuana establishments, and to all other applicable zoning bylaws governing front-, side-, and rear- lot setbacks, curb cuts, signs, emergency vehicle access, and shall further remain in compliance with the terms of its certificate of occupancy. As a Product Manufacturer, which the Town of Uxbridge defines as a "Marijuana Establishment" under §400-23(A)(6), and which is located in the Industrial B zoning district, Applicant is permitted by right as a principal use to conduct its operations pursuant to the specific requirements enumerated herein and Article III, §400-10. Applicant shall also obtain a license from the Board of Selectmen pursuant to Uxbridge General Bylaws, Section 60, on "Marijuana Licenses".

The time frame for obtaining permits for these marijuana establishment's are as follows: 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

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): 1/28/22
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:

1/13/22

b. Name of publication:

Worcester
Telegram &

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:

1/21/22

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:

1/21/22

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:

TSC Operations, LLC

Name of applicant's authorized representative:

Ryan Cohen

Signature of applicant's authorized representative:



Community Outreach Meeting

TSC Operations, LLC hosted a virtual Community Outreach Meeting on January 28, 2022. A total of three people were in attendance.

A recording of the meeting is publicly accessible at the link below:

<https://youtu.be/oa5D6uysOW8>



Quinn Heath <quinn@mensinggroup.com>

Seeking Permission to Host Community Meeting Virtually

3 messages

Quinn Heath <quinn@mensinggroup.com>
To: Steven Sette <ssette@uxbridge-ma.gov>

Thu, Jan 6, 2022 at 2:52 PM

Dear Town Manager Sette:

Our client, TSC Operations, LLC, is planning to have a Community Outreach Meeting in Uxbridge as a part of the application process for a state cannabis license. In light of the ongoing COVID-19 pandemic, TSC Operations, LLC is seeking your permission to host a Community Outreach Meeting virtually over the Zoom platform on January 28th.

Applicants are permitted to host these meetings virtually with the town's permission pursuant to the Cannabis Control Commission's [August 30th Administrative Order Allowing Web-Based Community Outreach meetings](#).

Would you be willing to provide TSC Operations, LLC with permission to host its Community Outreach Meeting virtually?

Thank you for your assistance in this matter.

Best,

Quinn Heath, Esq.
Associate
The Mensing Group LLC
Quinn@MensingGroup.com | (480) 628-1251

Steven Sette <ssette@uxbridge-ma.gov>
To: Quinn Heath <quinn@mensinggroup.com>

Thu, Jan 6, 2022 at 3:24 PM

Similar response as previously granted.

Sent from my iPhone

On Jan 6, 2022, at 2:59 PM, Quinn Heath <quinn@mensinggroup.com> wrote:

[Quoted text hidden]

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Quinn Heath <quinn@mensinggroup.com>
To: Steven Sette <ssette@uxbridge-ma.gov>

Thu, Jan 6, 2022 at 3:37 PM

Hello Steven,

Thanks for the written confirmation on both of these, and have a great afternoon!

Best,

Quinn Heath, Esq.
Associate
The Mensing Group LLC

telegram.com

CLASSIFIED

AUTOMOTIVE • REAL ESTATE • EMPLOYMENT • MARKETPLACE

EMAIL: classifieds@telegram.com

DEADLINES Daily: 5:00pm on the day before publication • Sunday & Monday: 5:00pm Friday | DISPLAY ADS Daily: 2 working days before publication • Sunday & Monday: 9:00am Thursday



General Auto

MOTORCYCLES

Harley-Davidson 2007 FLHTCU Electra Glide Ultra Classic, 96 c.i., 15838 miles, black, adult owned, info at virgim@viasatnet.com, priced to sell at \$1,600, 508-617-3939

WANTED AUTOS



AABLE AUTO BUYERS Mass Auto Recycling paying \$500.00 or more, for right one most any car, truck, M/C of value. Junk, Wrecked, Repairable, Parts, or GOOD USED. Paying thousands for some. Call LARRY 508 769 3962



AABLE AUTO BUYERS Mass Auto Recycling paying \$500.00 or more, for right one most any car, truck, M/C of value. Junk, Wrecked, Repairable, Parts, or GOOD USED. Paying thousands for some. Call LARRY 508 769 3962



Autos By Make

BUICK

Buick 2007 CXL Top Of The Line CXL MODEL. Bulletproof 3.8 V6 Engine - Brilliant Silver Metallic Exterior. Light Grey Leather Interior. ELDERLY OWNED. ONLY 107,441 MILES. Heated Seats. Clean Carfax. New Front Rotors - Pads. Needs Nothing. Excellent Thru-out \$3950.60 Day Written Warranty. Call Michael. 508-365-8057



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REAL ESTATE SERVICES

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Rentals

Worcester ** 31 Caroline Street** Plantation Street area. Brand new One bedroom apartment... incl wash/dry, storage, off street parking, heat and h.w.. No smoking. No pets. To view apartment 508-756-2147 or cathy@botanybayproperties.com



APARTMENTS

Worcester...Center Hill Apts 503-505 Mill St... The Tannock area's newest apart ment homes. large 1 & 2 BR, W/D in each apt, storage, elevator, heat & hw incl, nice walking area. No pets. No smoking. 508-756 2147 or cathy@botanybayproperties.com



MISC. PETS

Mini Goldendoodle puppies! 3 males/6 females. Stunningly beautiful colors! Hypoallergenic. Minimal shedding. Will be approx 25-30 pounds full grown. Family raised and loved. Fun loving! Loves People! Sure to win your heart! First shots, vet exams, microchipped, 2 year health guarantee. Ready to go January 26. \$2,900. Hoosick Falls, NY 802-282-2232 call/text

German Shepherd Pups - AKC, males and females, great temperament, good family dogs, shots and wormed, hip and health guarantee, \$1,400. 978-249-3724

Male Maltese Puppy Vet checked, 860-942-2651, \$1400, current on vacs, loves to go for car rides, and loves everyone he meets.

Toy Fox Terrier Puppies 1 Male left, vet checked, current on vacs, \$1000, 860-680-2955



ARTICLES FOR SALE

WANTED TO BUY WANTED - CASH PAID - ANTIQUES, OLD RELIGIOUS MEDALS & ROSARIES, OLD POCKET WATCHES & WRIST WATCHES, OLD BOTTLES, JARS, CROCKS & JUGS, OLD MARBLES, LOCAL SOUVENIRS & ADVERTISING, OLD COIN BANKS, OLD SIGNS, 1920s & OLDER PAPER ITEMS, LETTERS, STAMPS & ENVELOPES, OLD PHOTOS, COSTUME, SILVER & GOLD JEWELRY, OLD KNIVES, TOKENS & COINS, OLD SILVERPLATE & STERLING, OLD TOYS, CARS & TRUCKS, OLD SIGNS, MILITARY ITEMS, OLD LEATHER BOUND BOOKS, 1960s & EARLIER SPORTS ITEMS, OLD CIGARETTE LIGHTERS, OLD PAINTINGS, OLD FOUNTAIN PENS. I BUY MANY KINDS OF OLDER ITEMS. ONE PIECE OR AN ENTIRE ESTATE. PLEASE CALL MY CELL PHONE ANYTIME. 413-237-3751

Male Maltese Puppy Vet checked, 860-942-2651, \$1400, current on vacs, loves to go for car rides, and loves everyone he meets.

Toy Fox Terrier Puppies 1 Male left, vet checked, current on vacs, \$1000, 860-680-2955



INFORMATION

Executive Director Position Position: Executive Director
Type: Part-Time
Hours: 24 Hours Weekly
Location: Whitinsville, MA

Description & Details
The Northbridge Housing Authority (NHA) seeks an experienced housing professional to direct a part time Agency. The position is 24 hours per week, benefits available. Salary Range is \$48,561-\$51,061 The NHA manages a total of 84 units of State elderly/handicapped housing (76 Chapter 667 units and 8 units of Chapter 689). The NHA will be Receiving 10 Alternative Housing Choice Voucher Program units to manage in the future.

Required Minimum Qualifications:
Two years' experience in public or private housing, community development, public administration, non-profit administration, or a related field that demonstrates strong management and organizational skills. Knowledge of the principles and practices of housing management, finances, and maintenance systems in public or private housing is desired. Excellent written and verbal communication skills required. Willingness to work with people of various socio-economic backgrounds. Willingness and interest in working with tenants on a personal level. While not required for hiring, certification as a property manager or similar classification by a nationally recognized housing or real estate organization or by certification as a MPHA of a DHC-approved Massachusetts Public Housing Administrator Certification Program is desirable or must be obtained within the first year of employment. Diverse applicants are encouraged to apply.

How to Apply / Contact
Submit cover letter and resume to: John O'Brien, Chairman
Northbridge Housing Authority, 12 Colonial Dr, Whitinsville, MA, 01588. Attn: Northbridge Housing Executive Director Search. Email: john@northbridgehousing.org No faxes please. Additional information may be obtained by request via above email. The NHA is an Equal Opportunity Affirmative Action Employer. Submitting deadline December 31, 2021

LEGAL NOTICES

THE HEALTH FOUNDATION OF CENTRAL MASSACHUSETTS ANNUAL MEETING

The Health Foundation of Central Massachusetts, Inc. will hold its Annual Meeting at 7:00 p.m. on January 20, 2022 via Zoom. Please contact the Foundation for meeting information at dmazeeo@hcfm.org.

January 13, 2022

NOTICE OF MORTGAGEE'S SALE OF REAL ESTATE

By virtue and in execution of the Power of Sale contained in a certain mortgage given by Janet J. Okerberg to Financial Freedom Senior Funding Corporation, dated September 3, 2008 and recorded in the Worcester County (Worcester District) Registry of Deeds in Book 43290, Page 187 of which mortgage the undersigned is the present holder, by assignment from:

Financial Freedom Senior Funding Corporation to Mortgage Electronic Registration Systems, Inc. ("MERS"), a Delaware corporation, its successor and assigns, as nominee for Financial Freedom Acquisition LLC, recorded on October 16, 2009, in Book No. 44974, at Page 103

Mortgage Electronic Registration Systems, Inc., as nominee for Financial Freedom Acquisition LLC to Bank of New York Mellon Trust Company, N.A. as Trustee for Mortgage Assets Management Series I Trust, recorded on February 1, 2021, in Book No. 64367, at Page 244

Bank of New York Mellon Trust Company, N.A. as Trustee for Mortgage Assets Management Series I Trust to Longbridge Financial LLC, recorded on June 18, 2021, in Book No. 65416, at Page 317

for breach of the conditions of said mortgage and for the purpose of foreclosing, the same will be sold at Public Auction at 1:00 PM on January 28, 2022, on the mortgaged premises located at 131 McCarty Avenue, Cherry Valley (Leicester), Worcester County, Massachusetts, all and singular the premises described in said mortgage,

TO WIT: The land with the buildings thereon and all the privileges and appurtenances thereto belonging, situated in Cherry Valley, Leicester, Massachusetts, being lots 14 and 15 on Forest Street, formerly Pisgah Street, now designated as McCarty Avenue, together with lot 34 on Muller Street as set forth on a plan of lots plotted by Samuel C. Otis and recorded in the Worcester District Registry of Deeds, Plan Book 7, Page 11, and more particularly described as follows: BEGINNING at a point in McCarty Avenue at an iron pin, it being the southwest corner of the lot conveyed (14) and running westerly along McCarty Avenue one hundred thirty-four (134) feet to lot 16, THENCE northeasterly by lots 16 and 33 two hundred fifty (250) feet to Muller Street; THENCE southeasterly by Muller Street seventy-three (73) feet; THENCE southeasterly along a well two hundred fifty-six (256) feet to McCarty Avenue and the place of beginning. TOGETHER with a right of way twenty (20) feet in width running in a northerly direction in Forest Street from the most southerly corner of Lot 14, to McCarty Avenue. Said Forest Street is west of Lots 14 and 15.

For mortgagor's(s)' title see deed recorded with Worcester County (Worcester District) Registry of Deeds in Book 8091, Page 69.

These premises will be sold and conveyed subject to and with the benefit of all rights, rights of way, restrictions, easements, covenants, liens or claims in the nature of liens, improvements, public assessments, any and all unpaid taxes, tax liens or claims, liens, water and sewer liens and any other municipal assessments or liens or existing encumbrances of record which are in force and are applicable, having priority over said mortgage, whether or not reference to such restrictions, easements, improvements, liens or encumbrances is made in the deed.

TERMS OF SALE: A deposit of Five Thousand (\$5,000.00) Dollars by certified or bank check will be required to be paid by the purchaser at the time and place of sale. The balance is to be paid by certified or bank check at Harmon Law Offices, P.C., 150 California St., Newton, Massachusetts 02458, or by mail P.O. Box 610389, Newton Highlands, Massachusetts 02461-0389, within thirty (30) days from the date of sale. Deed will be provided to purchaser for recording upon receipt in full of the purchase price. The description of the premises contained in said mortgage shall control in the event of an error in this publication.

Other terms, if any, to be announced at the sale.

LONGBRIDGE FINANCIAL LLC
Present holder of said mortgage

By its Attorneys,
HARMON LAW OFFICES, P.C.,
150 California St.,
Newton, MA 02458
(617)558-0500
20055

January 06, 13, 20, 2022

Auction Sale according to law of all unclaimed overdue pledges of the Empire Loan Company of Worcester, on the premises-1130 Washington St., Boston, Ma. on Feb 1, 2022 @ 10:00 am. By Harvey Cohen, Auctioneer, Ma Lic. #100040.

January 13, 20, 27, 2022

Other terms, if any, to be announced at the sale.

LONGBRIDGE FINANCIAL LLC
Present holder of said mortgage

By its Attorneys,
HARMON LAW OFFICES, P.C.,
150 California St.,
Newton, MA 02458
(617)558-0500
20055

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January 13, 20, 27, 2022

Other terms, if any, to be announced at the sale.

LEGAL NOTICES

NOTICE OF MORTGAGEE'S SALE OF REAL ESTATE

Premises: 1 Envelope Terrace, Unit 104 Biscuit Lofts Condominium, Worcester, Massachusetts

By virtue and in execution of the Power of Sale contained in a certain mortgage given by Pamela Sklarz and Daniel F. Sklarz to Sovereign Bank, said mortgage dated May 30, 2007, and recorded in the Worcester County (Worcester District) Registry of Deeds in Book 41229 at Page 236 and now held by Santander Bank, N.A. f/k/a Sovereign Bank, N.A. f/k/a Sovereign Bank for breach of the conditions in said mortgage and for the purpose of foreclosing the same, will be sold at Public Auction on **January 28, 2022 at 11:00 AM** Local Time upon the premises, directly in front of the building containing said unit, all and singular the premises described in said mortgage, to wit:

Unit Address: One Envelope Terrace, Worcester, MA 01604 The unit is conveyed together with:

1. An undivided 2.526% Beneficial Interest in the Common Areas and Facilities ("Common Elements") of the Condominium described in the Master Deed;

2. The right to use two (2) outdoor parking spaces at the Condominium;

3. The right to use such other Limited Common Elements (if any) described in said Master Deed as being appurtenant to the said Unit;

4. An Easement for the continuance of all encroachments in the Unit on any adjoining Units or Common Elements existing as a result of construction of the Building or which may come into existence hereafter as a result of settling or shifting of the Building, or as result of repair or restoration of the Building or of the Unit after damage or destruction by fire or other casualty, or after a taking in condemnation or eminent domain proceedings, or be reason of an alteration or repair to the Common Elements made by or with the consent of the Trustees;

5. An easement in common with the owners of other Units to use any pipes, wires, ducts, flues, cables, conduits, public utility lines and other Common Elements, located in any other unit or elsewhere in the Condominium, and serving the Unit conveyed hereby; and

6. Rights and easements in common with other Unit Owners as described in the Master Deed.

Said Units is conveyed subject to:

a. easements in favor of other Units and in favor of the Common Elements for the continuance of all encroachments of such adjoining or other Units or Common Elements on the Unit hereby conveyed, now or existing as a result of construction of the Building, or which may come into existence hereafter as a result of settling or shifting of the Building, or as a result of repair or restoration of the Building, or of any adjoining Unit or of the Common Elements after damage or destruction by fire or other casualty, or after a taking in condemnation or repair to the Common Elements made by or with the consent of the Trustees;

b. An easement in favor of the other Units to use the pipes, wires, ducts, flues, conduits, cables, public utility lines, and other Common Elements located in the Unit or elsewhere in the Condominium and serving such other Units;

c. The Provisions of this Unit Deed, the Master Deed, the Declaration of Condominium Trust, and the Condominium Rules and Regulations, as same may be amended from time to time, which shall constitute covenants running with the land and which shall bind any person having at any time any interest or estate in the Unit, as though such provisions were recited and stipulated at length herein; and

d. All easements, agreements, restrictions and other matters of record insofar as same are now in force and applicable.

The Unit is intended only for residential purposes, as more fully described in the Master Deed.

See Deed in Bk. 41239 Pg. 234

The description of the property that appears in the mortgage to be foreclosed shall control in the event of a typographical error in this publication.

For Mortgagor's Title see deed dated December 1, 2009, and recorded in Book 45181 at Page 16 with the Worcester County (Worcester District) Registry of Deeds.

Said Unit will be conveyed together with an undivided percentage interest in the Common Elements of said Condominium appurtenant to said Unit and together with all rights, easements, covenants and agreements as contained and referred to in the Declaration of Condominium, as amended.

TERMS OF SALE: Said premises will be sold and conveyed subject to all liens, encumbrances, unpaid taxes, tax titles, municipal liens and assessments, if any, which take precedence over the said mortgage above described.

FIVE THOUSAND (\$5,000.00) Dollars of the purchase price must be paid by a certified check, bank treasurer's or cashier's check at the time and place of the sale by the purchaser. The balance of the purchase price shall be paid in cash, certified check, bank treasurer's or cashier's check within sixty (60) days after the date of sale.

Other terms to be announced at the sale.

BENNETT & MCHUGH, PC
270 Farmington Avenue
Farmington, CT 06032

Attorney for Santander Bank, N.A. f/k/a Sovereign Bank, N.A. f/k/a Sovereign Bank
Present Holder of the Mortgage
(860) 677-2868
December 30, 2021 January 06, 13, 2022

December 30, 2021 January 06, 13, 2022

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December 30, 2021 January 06, 13, 2022

LEGAL NOTICES

NOTICE OF MORTGAGEE'S SALE OF REAL ESTATE

Premises: 27 County Street, Worcester, Massachusetts

By virtue and in execution of the Power of Sale contained in a certain mortgage given by Antonio Rodriguez Lucas to Mortgage Electronic Registration Systems, Inc., as nominee for Stearns Lending, LLC, said mortgage dated June 2, 2017, and recorded in the Worcester County (Worcester District) Registry of Deeds, in Book 57208 at Page 299 and now held by Freedom Mortgage Corporation by virtue of an assignment from Mortgage Electronic Registration Systems, Inc., solely as nominee for Stearns Lending, LLC, to Freedom Mortgage Corporation dated November 19, 2019 and recorded in the Worcester County (Worcester District) Registry of Deeds, in Book 61453 at Page 201 for breach of the conditions in said mortgage and for the purpose of foreclosing the same, will be sold at **Public Auction on February 3, 2022 at 11:00 AM** Local Time upon the premises, all and singular the premises described in said mortgage, to wit:



January 21, 2022

To Whom It May Concern:

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Friday, January 28, 2022 at 6:00 p.m. In light of COVID-19, it will be held by the Zoom platform at:

Meeting Link: <https://us06web.zoom.us/j/86773731074>

Dial-in #: (929) 205-6099

Meeting ID: 867 7373 1074

The proposed Adult-Use Marijuana Product Manufacturer and Marijuana Cultivator is anticipated to be located at 56 Industrial Drive, Units A and B, Uxbridge, MA 01569. There will be an opportunity for the public to ask questions.

Sincerely, on behalf of TSC Operations, 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 and Address of Sender The Mensing Group LLC 100 State Street, 9th Floor Boston, MA 02109	TOTAL NO. of Pieces Listed by Sender	TOTAL NO. of Pieces Received at Post Office™	Affix Postn
	Postmaster, per (name of receiving employee)		



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USPS® Tracking Number Firm-specific Identifier	Address (Name, Street, City, State, and ZIP Code™)
1.	[REDACTED] BLACKSTONE, MA 01504
2.	[REDACTED] UXBRIDGE, MA 01569
3.	Kelly Cote, Town Clerk Uxbridge Town Hall 21 South Main St Uxbridge, MA 01569
4.	Steve Sette, Town Manager Uxbridge Town Hall 21 South Main St Uxbridge, MA 01569
5.	Board of Selectmen Uxbridge Town Hall 21 South Main St Uxbridge, MA 01569
6.	



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Meeting Link: <https://us06web.zoom.us/j/86773731074>

Dial-in #: (929) 205-6099

Meeting ID: 867 7373 1074

The proposed Adult-Use Marijuana Product Manufacturer and Marijuana Cultivator is anticipated to be located at 56 Industrial Drive, Units A and B, Uxbridge, MA 01569. There will be an opportunity for the public to ask questions.

Sincerely, on behalf of TSC Operations, 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



300 foot Abutters List Report

Uxbridge, MA
January 20, 2022

Subject Property:

Parcel Number: 40_4659
CAMA Number: 40_4659_
Property Address: 56 INDUSTRIAL DR

Mailing Address:

[REDACTED]
UXBRIDGE, MA 01569

Abutters:

Parcel Number: 40_3086
CAMA Number: 40_3086_
Property Address: COMMERCE DR

Mailing Address:

[REDACTED]
UXBRIDGE, MA 01569

Parcel Number: 40_3855
CAMA Number: 40_3855_
Property Address: 35 COMMERCE DR

Mailing Address:

[REDACTED]
BREWSTER, NY 10509

Parcel Number: 40_4644
CAMA Number: 40_4644_
Property Address: 40 INDUSTRIAL DR

Mailing Address:

[REDACTED]
WAKEFIELD, RI 02879

Parcel Number: 40_4748
CAMA Number: 40_4748_
Property Address: 66 INDUSTRIAL DR

Mailing Address:

[REDACTED]
UXBRIDGE, MA 01569

Parcel Number: 40_4786
CAMA Number: 40_4786_
Property Address: INDUSTRIAL DR

Mailing Address:

[REDACTED]
UXBRIDGE, MA 01569

Parcel Number: 45_533
CAMA Number: 45_533_
Property Address: 29 INDUSTRIAL DR

Mailing Address:

[REDACTED]
HOLLISTON, MA 01746

Parcel Number: 45_624
CAMA Number: 45_624_
Property Address: 47 INDUSTRIAL DR

Mailing Address:

[REDACTED]
BLACKSTONE, MA 01504

Parcel Number: 45_626
CAMA Number: 45_626_
Property Address: 47 INDUSTRIAL DR

Mailing Address:

[REDACTED]
BLACKSTONE, MA 01504

Parcel Number: 45_635
CAMA Number: 45_635_
Property Address: 57 INDUSTRIAL DR

Mailing Address:

[REDACTED]
HOLLISTON, MA 01746

Parcel Number: 45_727
CAMA Number: 45_727_
Property Address: 77 INDUSTRIAL DR

Mailing Address:

[REDACTED]
UXBRIDGE, MA 01569



www.cai-tech.com

Data shown on this report is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this report.



Name and Address of Sender The Mensing Group LLC 100 State Street, 9th Floor Boston, MA 02109	TOTAL NO. of Pieces Listed by Sender	TOTAL NO. of Pieces Received at Post Office™	Affirmation Pos:
	Postmaster, per (name of receiving employee)		
USPS® Tracking Number Firm-specific Identifier	Address (Name, Street, City, State, and ZIP Code™)		
1.	[REDACTED] UXBRIDGE, MA 01569		
2.	[REDACTED] BREWSTER, NY 10509		
3.	[REDACTED] WAKEFIELD, RI 02879		
4.	[REDACTED] UXBRIDGE, MA 01569		
5.	[REDACTED] UXBRIDGE, MA 01569		
6.	[REDACTED] HOLLISTON, MA 01746		



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1.	[REDACTED] BLACKSTONE, MA 01504
2.	[REDACTED] UXBRIDGE, MA 01569
3.	Kelly Cote, Town Clerk Uxbridge Town Hall 21 South Main St Uxbridge, MA 01569
4.	Steve Sette, Town Manager Uxbridge Town Hall 21 South Main St Uxbridge, MA 01569
5.	Board of Selectmen Uxbridge Town Hall 21 South Main St Uxbridge, MA 01569
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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, Ryan Cohen, (*insert name*) certify as an authorized representative of TSC Operations LLC (*insert name of applicant*) that the applicant has executed a host community agreement with Town of Uxbridge (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on 1/12/2022 (*insert date*).

Ryan Cohen

Signature of Authorized Representative of Applicant

Host Community

I, Steven Sette, Town Manager, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Town of Uxbridge (*insert name of host community*) to certify that the applicant and Town of Uxbridge (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 1/12/2022 (*insert date*).

Steven Sette

Signature of Contracting Authority or
Authorized Representative of Host Community



Reducing recidivism and mass incarceration in Massachusetts

March 2, 2022

To the Massachusetts Cannabis Control Commission:

On behalf of the The Big Hope Project we are happy to accept a donation of \$2,500 from TSC Operations LLC We look forward to receiving this donation on an annual basis.

The Big Hope Project, Inc. is a 501c founded by two Haitian American brothers from Dorchester, Massachusetts. We provide restorative justice services primarily in areas disproportionately impacted by the war on drugs. Our mission is to uplift returning citizens, youth offenders, and the melanated diaspora to deter the cycle of recidivism and mass-incarceration. To that end, the Big Hope Project aims to provide those individuals with professional restorative justice services such as record sealing and expungement, advocacy for automatic sealing, outreach for the social equity program, and community wraparound services. This annual donation will directly support the Big Hope Project in performing this critical work.

Specifically, this donation will go towards supporting the services described above, in particular our goal of sealing/expunging twenty MA criminal records from demographics identified by the C.C.C. as harmed by the war on drugs. The Big Hope project aims to positively impact those communities through this work.

The individuals that we target are heavily made up of people meeting the following criteria:

- Are residents of an area of disproportionate impact, as identified by the Cannabis Control Commission, for at least 5 of the past 10 years and an income that does not exceed 200% of the Federal Poverty Level;
- Have past drug conviction(s) and residence in Massachusetts for at least the preceding 12 months;
- Are married to or the child of a person with a drug conviction and residence in Massachusetts for at least the preceding 12 months;

- Have been arrested for cannabis or cannabis-related charges in any U.S. State; and
- Are women, Disabled, Native American, LGBTQ, African American, Hispanic, or other Minority.

For more information on our organization and programming, please contact Harry Jean Jacques. We are able to provide an annual report to the donor summarizing the use of the funds, as well as indications of whether the individuals participating in our programs are from an area of disproportionate impact and/or whether our programs assisted individuals with past drug convictions. A copy of the annual report will be provided to the Cannabis Control Commission

Sincerely,



President, Harry Jean-Jacques

TSC Operations LLC

POSITIVE IMPACT PLAN

TSC Operations LLC is dedicated to serving and supporting those disproportionately harmed by cannabis prohibition, which the Cannabis Control Commission has identified as the following three Groups:

1. Past or present residents of the geographic areas of disproportionate impact (ADIs), which have been defined by the Commission and identified in its Guidance for Identifying Areas of Disproportionate Impact;
2. Massachusetts residents who have past drug convictions; and
3. Massachusetts residents with parents or spouses who have drug convictions.

To support such populations, TSC Operations LLC has created a Positive Impact Plan, summarized below, and has identified the Goal listed below, which shall be pursued by the Program outlined herein, and the progress of which shall be judged by the Measurements/Metrics as stated below, and adjusted as necessary.

Goal #1: Provide Massachusetts residents from ADIs with increased access to education and/or job training in the cannabis industry by giving \$2,500 in financial support per year to *New England Veteran's Alliance, Inc.*

Program #1: Our commitment to positively impact disproportionately harmed populations is an essential part of the company's ethos. Specifically, to implement the defined Goal, TSC Operations LLC will:

- Give an annual donation in the amount described in the Goal above 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 England Veteran's Alliance, Inc.* programs that provide: (1) education to veterans and their families on cannabis cultivation, with a focus on veterans from geographic ADIs or other ADIs as that term is defined by the Commission; and (2) peer support groups for veterans and their families, with a focus on veterans from geographic ADIs or other ADIs as defined by the Commission.

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

TSC Operations LLC

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.

The donation to *New England Veteran's Association* will directly assist individuals from areas of disproportionate impact and disproportionately impacted by the War on Drugs as that phrase is defined by the Commission. The *New England Veteran's Association* runs a "Veterans Cultivation Program" that supports veterans—including a heavy membership from ADIs as defined by the Commission—in learning the cultivation skills necessary to participate in the cannabis industry. The *New England Veteran's Association* has membership and leadership who are from geographic areas of disproportionate impact, and individuals with past cannabis drug convictions and their spouses or family members. The *New England Veteran's Association* tracks its members and program attendees who are members of the ADI groups and can provide a report to TSC Operations LLC each year to ensure that funds are supporting those groups. The attached letter from *New England Veteran's Association* describes in detail how the funds from TSC Operations LLC will be used to support individuals from Areas of Disproportionate Impact.

Measurements/Metrics #1: TSC Operations LLC will develop specific initiatives, creating partnerships and achieving measurable outcomes to ensure that TSC Operations LLC meets the plan's goal. 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:

- At the end of each year, TSC Operations LLC 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. TSC Operations LLC will continue to assess the viability and impact of financial donations made and annually review donation amounts. NEVA will provide an annual report to TSC Operations LLC 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.

Goal #2: Provide monetary support in the amount of \$2,500 per year to Big Hope Project Inc., as more particularly described below.

Program #2: Specifically, to implement the goal above, TSC Operations LLC will:

- Give an annual donation as described above to support Big Hope Project, Inc. The Big Hope Project, Inc. is an organization that works directly with many individuals who are members of ADIs in order to provide them with access to information and services relating specifically to Massachusetts criminal record sealing. The Big Hope Project, Inc.

TSC Operations LLC

is able to provide an annual report to the donor summarizing the use of the funds, as well as a summary of whether the individuals participating in the programs supported by this donation are from an area of disproportionate impact as defined by the Commission.

The donation will be used by the Big Hope Project, Inc. to help individuals from groups disproportionately impacted by the War on Drugs as that phrase is defined by the Commission. In particular, funds will be used to support individuals who have past drug convictions, their spouses and families, or individuals from a geographic ADI to obtain access to record sealing services. Access to the state mechanisms for sealing criminal records are a critical service in assisting those wronged by the War on Drugs. The attached letter from Big Hope Project, Inc. describes in greater detail how the donation will support individuals from areas of disproportionate impact.

Measurements and Metrics #2: Metrics tracked will include the following:

- At the end of each year, TSC Operations LLC 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 Big Hope Project, Inc. as outlined above. TSC Operations LLC will continue to assess the viability and impact of financial donations made and annually review donation amounts. Big Hope Project, Inc. will provide an annual report to TSC Operations LLC 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.

Goal #3: Hire at least 2 members of ADIs for our staffing needs.

Program #3:

- TSC Operations shall strive to hire at least 2 members of its team from geographic ADIs or other ADIs as that term is defined by the Commission and above.
- In particular, TSC Operations shall make hiring efforts targeted towards the nearby geographic ADI consisting of portions of Worcester, MA. TSC Operations management shall make annual advertisements in the print newspaper *Worcester Telegram & Gazette* as well as annual postings on job posting boards to be identified by TSC Operations management. Print advertisements will occur at least once per year.

Measurements and Metrics #3: TSC Operations shall evaluate its personnel files on an annual basis to determine how many employees are members of ADIs occupy positions within the company and that number shall be divided by TSC Operations' total staffing at its facility to determine the percentage achieved.

TSC Operations LLC

Disclosures

TSC Operations LLC 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 TSC Operations, LLC will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

TSC Operations LLC 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)*.

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

Signed under the pains and penalties of perjury, I, _____Ryan

Cohen_____, an authorized representative of _____**TSC Operations**

LLC_____certify that _____TSC

Operations_____ 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.

_____*Ryan Cohen*_____

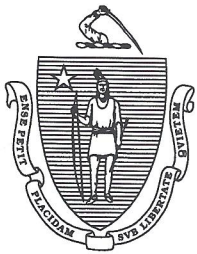
Signature of Agent

Date 1/26/2022

Name: Ryan Cohen

Title: Manager

Entity: TSC Operations



William Francis Galvin
Secretary of the
Commonwealth

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

January 7, 2022

TO WHOM IT MAY CONCERN:

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

TSC OPERATIONS, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **December 9, 2021**.

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: **NONE**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **BARRY RYNEARSON**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **BARRY RYNEARSON**

In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

A handwritten signature in cursive script that reads "William Francis Galvin".

Secretary of the Commonwealth





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

mass.gov/dor

Letter ID: L0206871232
Notice Date: January 12, 2022
Case ID: 0-001-404-415



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



TSC OPERATIONS, LLC
25 HARRIMAN RD
HUDSON MA 01749-2718

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, TSC OPERATIONS, 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

**OPERATING AGREEMENT
OF
TSC OPERATIONS, LLC**

THIS OPERATING AGREEMENT (this “**Agreement**”) is entered into and made effective as of December 9, 2021 (the “**Effective Date**”) by and between TSC OPERATIONS, LLC, a Massachusetts limited liability company (the “**Company**”), and TSC HOLDINGS GROUP, LLC, a Massachusetts limited liability company and sole member of the Company (the “**Member**”).

Background

A. The Company was formed on December 9, 2021 as a Massachusetts limited liability company under the laws of the Commonwealth of Massachusetts by the filing of the Certificate of Organization in the office of the Secretary of State of the Commonwealth of Massachusetts under Massachusetts General Laws, Chapter 156C.

B. The undersigned desires to memorialize its rights and obligations with respect to the Company pursuant to the terms of this Agreement.

Agreement

In consideration of the foregoing background and for other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, and intending to be legally bound hereby, the parties agree as follows:

**ARTICLE I
DEFINITIONS**

The following capitalized terms used in this Agreement shall have the following meanings (unless otherwise expressly provided herein):

“**Business**” means the principal business of the Company, which shall be to own and manage investments.

“**Capital Contribution**” means any contribution of cash or property to the Company, or any obligation to contribute cash or property to the Company, whenever made.

“**Code**” means the Internal Revenue Code of 1986, as amended, or corresponding provisions of subsequent superseding federal revenue laws.

“**Interest**” means the Member’s entire interest in the Company.

“**Person**” means any individual, trust, partnership, corporation, limited liability company or entity.

ARTICLE II

FORMATION OF COMPANY

2.1 Formation. The Company was formed on December 9, 2021 upon the filing of the Certificate of Organization with the Secretary of State of the Commonwealth of Massachusetts.

2.2 Name. The name of the Company is TSC Operations, LLC.

2.3 Principal Office. The principal office of the Company shall be the office as designated on the Certificate of Organization, or such other place as may from time to time be determined by the Member.

2.4 Purpose. The purposes of the Company shall be (a) to advance and grow the Business, (b) to engage in all other lawful business authorized pursuant to the laws of the Commonwealth of Massachusetts, and (c) to make, enter into and perform any contracts and other undertakings, and to engage in any activities and transactions as may be ancillary to or necessary or advisable to carry out the foregoing purposes.

2.5 Term. The term of the Company shall be perpetual unless the Company is earlier dissolved in accordance with the provisions of this Agreement.

ARTICLE III

CAPITAL CONTRIBUTIONS; LOANS; DISTRIBUTIONS

3.1 Capital Contributions. The Company shall keep a record of all Capital Contributions made by the Member. The Member shall not be required to make any Capital Contribution to the Company not specifically agreed to in writing between the Member and the Company.

3.2 Loans. Any and all loans made to the Company by the Member shall not be considered Capital Contributions.

3.3 Distributions. Distributions shall be made to the Member (in cash or in kind) at such times and in such amounts determined by the Member and as permitted by applicable law.

ARTICLE IV

MEMBER

4.1 Member. The name and address of the Member is:

TSC Holdings Group, LLC
25 Harriman Road
Hudson, MA 01749

4.2 Management. The Company shall be initially managed by **Heller Investment Holdings, LLC**.

4.3 Right to Rely on Member. Any Person dealing with the Company may rely (without duty of further inquiry) upon a certificate signed by a designee of the Member as to: (a) the identity of the Member; (b) the existence or non-existence of any fact or facts which constitute a condition precedent to acts by the Member or which are in any manner germane to the affairs of the Company; (c) the Persons who are authorized to execute and deliver any instrument or document of the Company; or (d) any act or omission by the Company or any other matter whatsoever involving the Company or the Member.

4.4 Authority to Designate Officers. The Member may elect, appoint or designate, by resolution or otherwise, individuals as officers of the Company and delegate to such officers such powers, authority and responsibilities as are (i) set forth in the designation or delegation, and (ii) necessary to carry out and implement the management decisions of the Member. The Member may remove any officer, with or without cause, at any time. Any officer may resign at any time by giving written notice to the Company. Any resignation shall take effect as of the date of the Company's receipt of such notice or at any later time specified in such notice (unless such officer is otherwise removed prior to such date); and unless otherwise specified in such notice, the acceptance of the resignation shall not be necessary to make it effective. Unless the Member decides otherwise, if the title to an officer of the Company is one commonly used for officers of a business corporation, the assignment of such title shall constitute the delegation to such individual of the authority and duties that are normally associated with that office. The current officers of the Company are as set forth on Schedule A attached hereto, as may be amended from time to time.

4.5 Liability of Member and Officers. Neither the Member nor any officer, agent or representative of the Member, or officer of the Company, shall be liable to the Company or to the Members, as applicable, for (i) the performance of, or the failure to perform, any act or duty on behalf of the Company if, in good faith, the Members or officer determined that such conduct was in the best interests of the Company and such conduct did not constitute fraud, gross negligence or reckless or intentional misconduct, (ii) the termination of the Company and this Agreement pursuant to the terms hereof, and (iii) the performance of, or the failure to perform, any act on behalf of the Company in good faith reliance on advice of legal counsel, accountants or other professional advisors to the Company.

4.6 Indemnification. The Company shall indemnify, defend and hold the Member and the officers, agents and representatives of the Member, and each officer of the Company and, in the discretion of the Member, each employee of the Company, harmless from and against any expense, loss, damage or liability incurred or connected with, or any claim, suit, demand, loss, judgment, liability, cost or expense (including reasonable attorneys' fees) arising from or related to, the Company or any act or omission of such Member (or officer, agent or representative of the Member) or officer (or employee) and amounts paid in settlement of any of the foregoing, to the fullest extent provided or allowed by the laws of the Commonwealth of Massachusetts. The Company may advance to any such Person the costs of defending any claim, suit or action against such Person.

4.7 Title to Company Property. All real and personal property shall be acquired in the name of the Company and title to any property so acquired shall vest in the Company itself rather than in the Member.

ARTICLE V

ACCOUNTING AND TAX MATTERS

5.1 Accounting Principles. The Company's financial statements shall be prepared and its profits and losses shall be determined in accordance with methods of accounting selected by the Member, which need not be the same as the method of accounting used for tax purposes.

5.2 Returns and Other Elections. The Member shall cause the preparation and timely filing of all tax returns required to be filed by the Company pursuant to the Code and all other tax returns deemed necessary and required in each jurisdiction in which the Company does business. All elections permitted to be made by the Company under federal or state laws shall be made by the Member in its sole discretion. So long as the Company has only one member, the Company shall be treated as a disregarded entity for income tax purposes.

ARTICLE VI

TRANSFERS; ADDITIONAL MEMBERS

6.1 Transferability of Membership Interest. The Member's Interest in the Company is freely transferable or assignable, in whole or in part, either voluntarily or by operation of law.

6.2 Admission of Additional Members. Additional members of the Company may be admitted to the Company at the direction of the Member only if a new operating agreement or an amendment and restatement of this Agreement is executed by such additional member or members.

ARTICLE VII

DISSOLUTION AND LIQUIDATION

7.1 Dissolution.

(a) The Company shall be dissolved and its affairs wound up and terminated only upon the determination of the Member. The dissolution or bankruptcy of the Member or the occurrence of any other event that terminates the continued membership of the Member shall not cause a dissolution of the Company.

(b) Dissolution of the Company shall be effective on the day on which an event described in Section 7.1(a) above occurs, but the Company shall not terminate until articles of dissolution shall be filed with the Commonwealth of Massachusetts and the assets of the Company are distributed as provided in Section 7.2 below. Notwithstanding the dissolution of the Company, prior to the termination of the Company, the business of the Company and the affairs of the Member shall continue to be governed by this Agreement.

7.2 Winding Up. Upon dissolution, the Company shall continue until the winding up of the affairs of the Company is completed and a certificate of dissolution has been filed pursuant to the laws of the Commonwealth of Massachusetts. Upon the winding up of the Company, the Company's property shall be distributed (a) first to creditors, including the Member if the Member is a creditor, to the extent permitted by law, in satisfaction of the Company's liabilities, and (b) then to the Member. Distributions shall be in cash or property or partly in both, as determined by the Member.

ARTICLE VIII

MISCELLANEOUS PROVISIONS

8.1 Notices. Any notice, demand or communication required or permitted to be given by any provision of this Agreement shall be in writing and shall be deemed to have been delivered (a) two business days after being sent by registered or certified United States mail, or (b) upon delivery if hand delivered, sent via facsimile transmission or electronic mail. If delivered to the Member, such notice shall be delivered to his address as it appears in Section 4.1 above. If to the Company, such notice shall be delivered to its principal place of business.

8.2 Governing Law. This Agreement, and the application and interpretation hereof, shall be subject to and governed exclusively by its terms and by the laws of the Commonwealth of Massachusetts, without regard to its conflicts of laws provisions.

8.3 Construction. Whenever the singular number is used in this Agreement and when required by the context, the same shall include the plural and vice versa, and the masculine gender shall include the feminine and neuter genders and vice versa. Unless expressly stated otherwise, Section and Article references herein shall refer to the Sections and Articles of this Agreement.

8.4 Waivers. No waiver by any party of the breach of any provision hereof shall be deemed to constitute a waiver of any continuing or subsequent breach of such provision or any other provision hereof.

8.5 Severability. If any provision of this Agreement or the application thereof to any Person or circumstance shall be invalid, illegal or unenforceable to any extent, the remainder of this Agreement and the application thereof shall not be affected and shall be enforceable to the fullest extent permitted by law, provided that the essential purpose of this Agreement is not frustrated.

8.6 Heirs, Successors and Assigns. The covenants, terms, provisions and agreements herein contained shall be binding upon, and inure to the benefit of, the parties hereto and, except as otherwise provided to the contrary, their respective heirs, executors, administrators, legal representatives, successors and permitted assigns.

8.7 Entire Agreement. This Agreement embodies the entire agreement and understanding between the parties hereto with respect to the subject matter hereof and supersedes all prior agreements and understandings relating to such subject matter.

[SIGNATURES APPEAR ON FOLLOWING PAGE]

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be signed as of the Effective Date.

COMPANY:

TSC OPERATIONS, LLC

By: TSC Holdings Group, LLC

By: 
Name: Daryl Heller
Title: Member

MANAGER:

HELLER INVESTMENT HOLDINGS LLC

By: 
Name: Daryl Heller
Title: Manger

TSC Operations 2022 Business Plan



"The Region's Premier Cultivator and Manufacturer"

This Business Plan is confidential and contains proprietary information and intellectual property of TSC Operations, LLC. Neither this Business Plan nor any of the information contained herein may be reproduced or disclosed under any circumstances without the express written permission of TSC Operations.

This Business Plan does not constitute an offer to sell or solicitation of an offer to buy securities of TSC Operations. Any such offers and sales will be made only to “Accredited Investors,” as defined in Regulation D under the Securities Act of 1933, as amended, pursuant to separate agreements to be negotiated by the parties.

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1. Executive Summary

TSC Operations (TSC) is a Massachusetts-based startup entering the recreational marijuana industry in Q3 2022. TSC currently has a provisional license for Tier-3 Cultivation (up to 20,000 sq. ft. of grow canopy) and pursuing Manufacturing (permits the production of concentrates and edibles). With the state's tempered roll out of licenses, each permit has and will become extremely valuable. TSC has procured a building, received a host-town agreement, and begun building out its retrofit.

TSC's owners, Scott Bulkeley (Marines) and Ryan Cohen (MBA)(Army), are honorably discharged military veterans. Both have over 10 years of extensive indoor cultivation experience and will leverage the discipline learned in the military to produce high volume & grade cannabis flowers and concentrates. Since its inception in December 2018, TSC's leadership has navigated through the many challenges associated with the licensing process, and without having to hire costly consultants or lobbyists.

Revenue forecasts are very strong with wholesale prices of dried cannabis currently at \$4,000 per pound. At capacity (approx. 40,000 sq. ft.), TSC can generate \$20+ million in annual revenue from cultivating and selling 7K+ pounds of dried cannabis and manufacturing another \$2+ million of concentrates. TSC has secured letters of intent (LOI's) with several local dispensaries and the company is confident it can achieve 100% penetration to market.

TSC is part of the Cannabis Control Commissions (CCC) Social Equity Program (SE). The numerous benefits for being a SE participant include a reduction in fees, three-year exclusive access to Social Consumption Venue and Home Delivery licenses. All opportunities are being reviewed to maximize profit. The SE program also allows for an expedited application review, and with time to market being so crucial, it is beneficial that this program can accelerate the licensing timeline.

In September 2020, TSC procured a contingent lease for 28,000 sq. ft. in ultra-welcoming Uxbridge MA with another 10,000+ sq. ft. expansion already procured within the same space. This lease is favorable for price, location, and flexibility. TSC has secured a community host-town agreement from Uxbridge and anticipates the upcoming Community Outreach Meeting for manufacturing will be successful.

TSC has and will continue to develop strong relationships with high-end dispensary clients who understand and appreciate craft cannabis. TSC will be a leader in the cannabis space by delivering an extremely reliable product with airtight standards of excellence. A dedicated and passionate team will produce award-winning genetics through careful strain acquisition and rotation, exacting protocol for fallout mitigation, and by developing detailed analytics.

TSC will have an incredible company culture built on the core values of the Army and Marines. Ryan will instill the values learned in the 82nd Airborne Infantry: Loyalty, Duty, Respect, Selfless Service, Honor, Integrity and Personal Courage. Scott will bring leadership and values learned as a Marine: Honor, Courage and Commitment. *This* commitment to excellence will make TSC Operations a respected and trustworthy company to partner with.

2. Management Team

Co-founder Scott Bulkeley of Wayland, MA will be an integral part of its cultivation department. Scott is an experienced indoor grower who has been cultivating marijuana for over 15 years. He has excelled and perfected his craft using many different mediums of growing. Including soil, coco, deep-water hydroponics, aeroponics, and organic soil. Since 2007, Scott has owned and operated a successful tiling and stone business in Middlesex County. Scott is a veteran of the United States Marine Corp where he served honorably in the 3rd BLT 6th Marines, a special operations expeditionary unit, from 1996-2000.

Co-founder Ryan Cohen of Hudson, MA will be TSC's Head of Sales and Brand Ambassador. Ryan is also an experienced grower who has produced grade A cannabis since 2012. He has extensive knowledge of this space and understands all the nuances of cultivating and selling high grade cannabis. Ryan is a veteran who served honorably with the Army's elite 82nd Airborne Infantry from 2000-2003. In 2001, Ryan suffered traumatic brain and back injuries during a parachuting exercise and has since used cannabis medicinally to help with his injuries

Ryan successfully used his G.I. Bill and vocational rehab benefits to earn his MBA from Clark University.

3. Market Size/ Target Market

Legalized adult-use marijuana is poised for explosive growth as this new industry unfolds. According to prnewswire.com, “Nationally, by 2021, legal cannabis will generate \$39.6 billion in overall economic impact, and much of that is coming from Massachusetts.” Also, there are educated forecasts that have the Massachusetts market flourishing but expanding over time “The Bay State cannabis market will likely reach around \$1.8 billion, and it's going to take millions of square feet to meet the demand for cannabis in Massachusetts, and I think it's going to take years to get that built out”-Tim Keough CEO AmeriCann

Average retail prices of 500mg marijuana vapes and 1g of cannabis flower






State	Q2 - 2020 - ARP for 500mg vape	ARP for gram of flower
Massachusetts	\$54.18	\$11.85
Arizona	\$26.3	\$6.66
California	\$29.85	\$8.71
Colorado	\$23.59	\$4.37
Illinois	\$29.79	\$15.59
Maryland	\$45.42	\$11.81
Nevada	\$33.98	\$8.43
Oregon	\$24.37	\$4.81

Source: BDSA Retail Sales Tracking

TSC Operations has begun to target dispensaries in Massachusetts that attract medium to high earners who appreciate and can afford a premium offering. This target demands a brand that consistently pushes the limits of quality. Like with craft beer breweries, acquiescing to these premium consumers tastes will require precision and receptiveness. Impressing these ultra-knowledgeable consumers will be possible through continuous rotation of unique strain selections, while keeping the flagship strains that sell fastest. Reaching these dispensaries will require the sales team to cultivate meaningful relationships with buyers based on premium offerings that are priced fairly for all to profit.

4. Customers

TSC has secured letters of intent (LOI's) with several dispensaries for year one operations, and will continue to seek out other Massachusetts storefronts who seek premium products. TSC has and will continue to develop strong relationships with dispensaries like Temescal Wellness and Columbia Care, both well-respected multi-state operators. TSC will consistently offer products that are "Top Shelf" quality that dispensary owners and end-users will appreciate. Dealing in a Business-to-Business (B2B) market, TSC must seek out companies that *want* premium entities on their shelves. TSC will drive mutual profitability with other marijuana leaders who share a commitment to quality, and have a reputation for running an ethically sound business. TSC's target market end-users will be consumers who are seeking-

-  Consistent flowers and concentrates that regularly strive towards excellence
-  Rotation and variety of unique strains and products not accessible elsewhere
- 
-  A transparent and honest company/brand that gives back to the community
-  Clean "tested" commodities with airtight quality control

5. Products

5.1 Top Shelf Flower

TSC Operations will produce marijuana "flower" that is grown in a state-of-the-art facility using Advanced brand nutrients in a natural Rockwool medium. TSC will cultivate rare and in-demand strains which can average over 25% THC. With these already amazing genetics procured (see several below), it sets TSC above other companies who are simply cultivating "what everyone else is." TSC will grow their flowers under innovative FOHSE LED lighting which limits heat issues and allows maximum exposure while adding weight to the canopy. With precision execution and world class equipment, TSC will continue to reach the upper echelons of craft cannabis that most cannot.

TSC's grow decisions will be based on industry SOP and compliance standards and will be carefully monitored and screened after each process and harvest. Leaving nothing to chance, TSC will cultivate in a clean and organized environment, and ultimately produce consistent high-grade cannabis. Using judicious and informed strain selection, TSC will keep existing customers satisfied, while also inviting new users as well. With many companies also considering craft cannabis as an entry point, it is

important to quickly distinguish TSC as a craft leader. This distinction will become especially important as the industry begins to mature regionally in coming years.



With dozens of different options available for producing concentrates, TSC will choose the most viable path(s) that are in-demand both now and in the future. Below is a list of products TSC Operations will pursue within its manufacturing division.

- 🌿 **Solvent-less Concentrates-** With product names such as Rosin Tech, bubble hash, ice water hash and dry sift hash, the market for “clean extracts” has emerged as flagship sellers. Rosin Technology involves using a simple industrial compression to extract arguably the most “terpy” (tasty) finished product. Generally, consumers desire products that are natural (solvent free) and not volatile, and for this reason, Rosin will remain an emerging product. This in-demand product costs relatively little to produce, is relatively simple to master, and will take up little space to setup. Simply, Rosin has a high opportunity cost with low risks as compared to more in-depth options.

6. Operations

6.1 Application/Build-out Phase





After receiving its provisional licenses, TSC will be operating without any cannabis cultivating for a period of 7-10 months while the retrofitting of the location takes place. During this initial phase, TSC will dial in and optimize their cost of production with the help of automation and usage of innovative products. The design/build-out phase will delay the first crop until approximately nine or ten months after construction begins. This will be a transitional period where value added tasks will transition from assembly and construction to more day-to-day manufacturing.

6.2 Manufacturing Phase

In Q2, 2022 TSC will begin to source raw materials such as distillate and hash to manufacture products before cultivation comes online. After the cultivation phase begins to supply materials for manufacturing, then TSC will use its trim and bottom branch flowers using Rosin Tech, a solvent-less extraction. Pre-rolls will be another product that is focused on heavily in year one and beyond. This will be TSC's phase one manufacturing plan, as it provides a cost effective (\$100k upfront) solution that customers crave. TSC does not anticipate a steep learning curve for this process as the owners have already been trained on this revolutionary method. Rosin Tech is a great entry mode solution that utilizes manufacturing that includes an ease of setup and use, low barriers financially, short- and long-term viability, and a premium price tag (up to \$120 per gram retail).

6.3 Cultivation Phase

This will begin with the vegetative (propagation) phase where plants will be sized up and begin receiving their first nutrients (fertilization). Mothering rooms will then be filled with verified winning genetics. From there, the SOP will dictate what happens daily, weekly, and monthly for each employee and each grow space. TSC anticipates six flowering rooms that will be staggered in different phases of the grow cycle. This strategy helps immensely with fallout mitigation and will ensure that TSC harvests more perpetually. From seed to sale:

-  Cloning procedures
-  Transplanting/ Pruning
-  Feeding
-  Post-harvest procedures- trimming, curing, drying, weighing, packaging, and sterilization

7. Security Measures

With security being a top concern, TSC Operations will carefully follow the state's guidance in securing all products and facilities. Ensuring that these products remain safe from entering the black market is essential and will be treated as a major operations issue. Both internal and external security are important, and can affect a company's bottom line and perception in the industry and community.

TSC has finalized a contract with Secura, who has verified experience with securing and monitoring other local cultivation operations. The security plan set in place goes to great pains to meet or exceed what the CCC requires. These measures will help affect more stringent control over the building and products.

7.1 Internal Measures

TSC's internal security will include 24/7 surveillance of the entire growing/manufacturing space. Having a changing station at the entrance of the facility will ensure cleanliness and accountability are maintained. Best practices for inventory will ensure that all products are prevented from diversion. If/when the company needs to open the space to contractors or if trimming or other processes are outsourced onsite, TSC will be vigilant in maintaining full security and cleanliness. Additionally, the state has enforced a seed to sale program which uses RFID barcodes to digitally track the whereabouts of each seed and plant. These measures, along with stringent hiring practices will help TSC to mitigate any theft, and thus prevent products from entering the black market

7.2 External Measures

Protection of the building will follow strict guidelines that have been enacted by the CCC. TSC does not take the threat of diversion to the black market, and especially to minors lightly. For this reason, TSC will exactly follow the law (from the CCC website)- "the Company agrees to implement a method such as a keypad, electronic access card, or other similar method for controlling access to areas in which marijuana or marijuana products are kept in compliance with 935 CMR 500.110." TSC is working with the town of Uxbridge to take further measures to comply with what the state requires and will work closely with them to maintain compliance.

8. Transportation Plan

Both manufacturing and cultivating licenses include transporter provisions, allowing the licensee the ability to transport. TSC believes initially that outsourcing this service to an established and licensed company makes the most sense. Depending on the costs that are associated with transporting, TSC might elect to purchase and retrofit their own transportation vehicle later. For merchandise to reach storefronts, TSC's options to transport include pursuing a transport license, contracting the process out to a licensed vendor, or having the storefronts visit TSC's cultivation facility for procurement. TSC has developed a great rapport with Plymouth Armor Group, and would welcome an agreement with them to service this need.

9. Legal Structure/Code of Conduct

TSC Operations has pursued incorporation as a limited liability corporation (LLC). This LLC will have 3+ owners who will work with the company's board to manage and grow the business. Research has shown that using an LLC for this entity makes the most sense because it allows the owners to define their compensation responsibilities and job descriptions, avoids double taxation, and lessens the possibility of personal liabilities. LLC's also function with very little paperwork, thus allowing TSC to concentrate on producing craft cannabis.

TSC will work tirelessly to promote honesty and integrity from within and seek partnerships with those companies who also emulate these qualities. Establishing a value chain that best represents TSC is an important consideration when building alliances. Further, TSC will only consider hiring those persons who have a verifiable record of integrity, selflessness, and coachability. With so much at stake for the company, it is decidedly more important to hire and train an applicant with a positive attitude and a strong commitment than one who may have more experience and less trainability.

10. Marketing Plan




11.1 Social Media

Marketing in the marijuana industry through social media has emerged as a main avenue for companies to promote and advertise their products. With Covid-19 not over, and making other in-person opportunities difficult, social media marketing will only expand worldwide. Using hashtags as anchors to drive consumers to the website remains an effective tool to drive revenue. TSC will explore cross promotion opportunities with its partners to remain effective and to continue using these important

marketing tools. TSC is exploring these avenues and will decide which social media platforms to develop. However, there is a certain amount of ambiguity currently regarding Instagram and other social media outlets as to their official stances on cannabis marketing. Many users have had their pages suspended or deleted without warning, leaving these companies and their followers in the dark.

11.2 Tradeshows and Other Cannabis Events

These events are a great way for TSC to engage and network with ancillary and other direct cannabis companies, as well as potential customers. The company travelled to Las Vegas in 2019 for the MJ Biz Convention and made dozens of connections. These events have become increasingly popular regionally and beyond and provide an opportunity to build alliances with others who can potentially be worthy partners. Below are some local and national events that TSC will pursue:

	Held at the DCU Center in Worcester, MA on December 15-16 th	<i>"A premiere New England cannabis competition culminating with an expo featuring speakers, vendors."</i>
	New England Cannabis Convention at the Hynes in Boston on March 22-24 th	<i>"3-day event will feature 350+ exhibitors, four programming tracks with 100+ speakers, and 10K people"</i>
	Las Vegas, NV Nov. 14-16 th 158 Speakers 35,000 Cannabis Professionals, and 1100 Booths	<i>"The preeminent conference to drive business deals/valuable connections with professionals."</i>

11.3 Direct Marketing

In a B2B market, it will be important for TSC to develop strong vendor relationships with dispensaries. Strong relationship management is essential in the cannabis industry, especially considering the number of sales targets will be minimal as more entities gain licensing. TSC will garner its target market's needs and address any concerns or requests. Not all dispensaries will wish to enter the craft cannabis arena, making it even more important to flesh out the market and select only those companies that will be most reciprocal to TSC's offerings.

to share industry information and product desires samples. TSC will continue to sponsor cannabis related events to gain more industry knowledge and to promote the TSC Operations brand.

11. Sales Plan

In Q4 2022, TSC Operations will begin cultivating its first cycle of cannabis flower. Ryan will be the company's lead salesperson and will encourage penetration into areas that most demand craft cannabis. Middlesex and Norfolk Counties are the two most heavily populated and affluent areas in the state, and nearby Worcester County has the most applications accepted from the CCC.

Infiltrating these three areas will be a key success factor that determines TSC's sales penetration.

Before cultivation begins, TSC will be visiting with dispensaries as they begin to open around the Commonwealth. In addition to Temescal Wellness, Patriot Care, Hudson Botanical, and Clean Techniques with whom TSC has already signed LOI's with, TSC will continue to solicit potential partners and educate them as to why its products are special. By meeting with these entity's TSC can gather data to best define what products/strains they are seeking and at what purchase price. Once established, the sales team will:

- ✻ Establish realistic sales targets for the short and long term
- ✻ Determine best sales prices to realistically infiltrate market share
- ✻ Discover and define best practices to attain maximum sales
- ✻ Analyze weekly, monthly, and annual sales goals to improve/adapt sales approaches

12. Regulatory and Intellectual Property

Nationally, many firms in the industry are facing fines or even suspension for not establishing or following strict operating guidelines. There is little ambiguity when reviewing the regulations enacted by the Cannabis Control Commission. The CCC has decided on the state's behalf how to enforce the law, and TSC will abide by them from day one. TSC believes that having a great training program and corresponding SOP will focus staff and allow them to analyze each step/process as compared to the established protocol. Operating by the book will limit negligence and ultimately protect TSC and its employees from unneeded backlash.

Protection of intellectual property (IP) has been an important focus in this industry as companies look to differentiate from the competition. With the cannabis industry still far from maturity, companies are

hyper-focused on research and development and innovation for discovery of the next *big thing*. Lazy companies will do whatever it takes to gain a rivals IP, and TSC will guard its company's secrets by dedicating staff training to IP protection and the dangers of why it is a threat. Just one rogue employee could divulge strain lists, specific equipment, or other valued information to weaken The Company.

13. Outreach Plan

Top Shelf's initial outreach plan will be to form a lasting relationship built on trust with our host community Uxbridge. TSC intends to lead by example through voluntary outreach and financial contributions. Being transparent, sustainable and philanthropic, will serve the company well in assuring all stakeholders that they chose the right partner in TSC.

TSC is a veteran owned business who wishes to take care of any potential veterans wanting to work in the industry. Top Shelf will give veterans who have served honorably preference over other applicants and will consider them strongly for any openings. This gesture will give back to veterans in the community, allow for great hires, and distinguish TSC as being a veteran friendly employer.

Finally, TSC takes drug abuse and drug education very seriously and will donate time and/or money to local efforts to combat the ongoing opioid epidemic. TSC also hopes that by educating young people and adults about the potential harms of misusing cannabis; like driving while impaired or underage usage, it will better inform them to make smart decisions regarding compliant usage.

14. Launch/Implementation Plan

The traction section below shows all completed and needed steps to commence operations in 2021.

Start Date	End Date	Milestone/Activity	Task Duration
4/12/2021	4/12/2021	Start Date	1
5/21/2021	2/20/2022	Identify Potential Investors	276
5/21/2021	11/7/2021	Develop Initial Facility Design (CAD)	171
6/15/2021	10/18/2021	Refine Cost and Revenue Assumptions	126
6/15/2021	2/25/2022	Begin Monthly On-Site Design Meetings	256
7/10/2021	1/1/2022	Solicit Bids from HVAC, Electrical, Builders	176
10/18/2021	7/25/2022	Visit and Identify Potential Dispensary Customers	281
10/28/2021	7/25/2022	Identify Possible Board Members	271
10/28/2021	1/26/2022	Develop Standard Operating Procedures	91
12/16/2021	12/31/2021	Incorporate TSC as an LLC	16
12/27/2021	1/26/2022	Identify Potential (non-FDIC) Banking Partners	31
12/27/2021	1/26/2022	Finalize Equipment Purchase Schedule	31
1/1/2022	1/26/2022	Finish Host Town Agreement and Comm Outreach Meeting	26
1/6/2022	2/8/2022	Finish Purchase of Property	34
1/6/2022	1/26/2022	Apply for Building Permits from Uxbridge	21
1/23/2022	1/28/2022	Begin Construction and Finish Development	6
1/23/2022	10/10/2022	Construction of 56 Industrial Dr	261
2/3/2022	2/15/2022	Submit Applications for Cultivation and Manufacturing	13
3/15/2022	6/15/2022	Applications are Accepted (Undetermined Amount of Time)	93
5/26/2022	11/7/2022	Review/Asses Mitigation Plans for Fallout	166
6/25/2022	7/25/2022	Identify/Negotiate with Potential Transport Partners	31
7/20/2022	9/8/2022	Interview and Begin Hiring Employees	51
7/25/2022	11/7/2022	Final Inspections	106
9/8/2022	11/7/2022	Operational Start-up	61
9/8/2022	12/17/2022	Commence Operations	101

15.Funding

(40k Sq. Feet)

Q4 2021- Q1 2022

Raised approx. \$8-12 mil in capital. Breakdown (initial/on-going costs)

- **\$7.4 million- retro-fit site**
- **\$3 million- equipment**
- **\$500K- Labor & Salary**
- **\$150K- Utilities**
- **\$250K- Power Upgrade**
- **\$200K- Sprinkler Upgrade**
- **\$250K- Rent**
- **\$75K- Design**

16. Projected Revenue

TSC Summary Proforma High / Moderate / Low						
	HIGH		MODERATE		LOW	
Flower Revenue	\$ 57,776,432		\$ 40,377,093		\$ 26,032,599	
Trim Revenue	\$ 5,691,410		\$ 3,728,855		\$ 2,137,004	
Total Revenue	\$ 63,467,841		\$ 44,105,947		\$ 28,169,604	
COGS	\$ 5,077,427	8.0%	\$ 5,072,184	11.5%	\$ 5,042,359	17.9%
Gross Margin	\$ 58,390,414	101.1%	\$ 39,033,763	96.7%	\$ 23,127,244	88.8%
SG&A	\$ 1,155,529	2.0%	\$ 1,130,559	2.8%	\$ 1,119,402	4.3%
EBITDA	\$ 57,234,885	90.2%	\$ 37,903,205	85.9%	\$ 22,007,843	78.1%
Assumptions:						
Flower Room Turns	5.80		5.70		5.60	
Grams per pound	454		454		454	
Grams per Square Foot	90		80		70	
Pounds per Square Foot	1.15		1.00		0.86	
Total Pounds Produced Annually	17,247		15,066		12,952	
Trim Pounds Produced Annually	5,691		4,972		4,274	
Flower Pounds Produced Annually	11,555		10,094		8,678	
Price per Pound of Flower	\$ 5,000.00		\$ 4,000.00		\$ 3,000.00	
Price per Pound of Trim	\$ 1,000.00		\$ 750.00		\$ 500.00	
Flower Room Canopy Sq Footage	15,000		15,000		15,000	
Cost per pound to produce	361		412		476	



2-7-2022

To Whom It May Concern,

My name is Bill Perrier and I am a licensed insurance agent for Charles River Insurance Brokerage in Framingham, MA. I am part of a team of insurance professionals that research cannabis insurance solutions and provide coverage for retail dispensaries, cultivation centers, manufactures, wholesalers, transporters, CBD companies and adult use home delivery businesses.

I have spoken with Ryan Cohen of TSC Operations LLC regarding his cannabis cultivation operation and his insurance policy will include general and product liability each with \$1,000,000 occurrence/\$2,000,000 aggregate and a deductible no larger than \$5,000.

Respectfully,

Bill Perrier

Sales Executive

Charles River Insurance Brokerage

508-740-3082

bperrier@charlesriverinsurance.com

www.charlesriverinsurance.com

ENERGY COMPLIANCE PLAN

TSC Operations (“TSC Operations” or the “Company”) will work with our architect and engineer to identify as many energy saving strategies as possible. In addition, TSC Operations 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.

TSC Operations will investigate rooftop solar arrays to generate electricity, and rooftop solar hot water to provide both hot water and heat for the space.

TSC Operations acknowledges that if a Provisional License is issued, TSC Operations, 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.

TSC Operations will also include a summary of information that was considered to make the decision (i.e. costs, available incentives, and bill savings). TSC Operations will engage in either

TSC Operations, LLC

a Mass Save audit or coordinate with our local municipal electric company to conduct an audit, which will be included in the summary.

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 TSC Operations to optimize its energy usage.

TSC Operations 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. TSC Operations will use best management practices to reduce energy and water usage, engage in energy consideration, and mitigate other environmental impacts.

TSC Operations 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.

MAINTAINING OF FINANCIAL RECORDS

TSC Operations, LLC (“TSC Operations”) 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, TSC Operations will implement the following policies for Recording Sales:

- (a) TSC Operations will utilize a point-of-sale (“POS”) system approved by the Commission, in consultation with the Massachusetts Department of Revenue (“DOR”).
- (b) TSC Operations may also utilize a sales recording module approved by the DOR.
- (c) TSC Operations will not utilize any software or other methods to manipulate or alter sales data at any time or under any circumstances.
- (d) TSC Operations 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. TSC Operations will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If TSC Operations 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) TSC Operations will comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.
- (f) TSC Operations will adopt separate accounting practices at the POS for marijuana and marijuana product sales, and non-marijuana sales.
- (g) TSC Operations 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 500.000.

Following the closure of TSC Operations, all records will be kept for at least two years, at TSC Operations’s sole expense, and in a form and location acceptable to the Commission, in accordance with 935 CMR 500.105(9)(g). TSC Operations 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 500.130.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

TSC Operations, LLC (“TSC Operations” 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. TSC Operations 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(3)(a), TSC Operations is providing these personnel policies, including background check policies, for its Marijuana Establishment that will be located in.

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 TSC Operations determines to be involved in discriminatory practices are subject to disciplinary action and may be terminated. TSC Operations 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 client.

In accordance with 935 CMR 500.105(1), General Operational Requirements for Marijuana Establishments, Written Operating Procedures, as a Marijuana Establishment, TSC Operations has and follows a set of detailed written operating procedures for each location. TSC Operations has developed and will follow a set of such operating procedures for each facility. TSC Operations’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.
- (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) Procedures to ensure accurate record-keeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
- (g) Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- (h) A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
- (i) Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- (j) Alcohol, smoke, and drug-free workplace policies;
- (k) A plan describing how confidential information will be maintained;

TSC Operations, LLC

(l) 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 jurisdiction.

(m) 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.

935 CMR 500.105(1) (m) Requirement may be fulfilled by placing this information on the Marijuana Establishment's website.

(n) 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), to be available upon inspection.

(o) Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.

(p) 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.

(q) 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 TSC Operations:

1. 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;
2. 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. All current and updated regulations and references at 29 CFR Parts 1903, 1904, 1910, 1915, 1917, 1918, 1926, 1928 and 1977 are incorporated by reference, and applicable to all places of employment covered by 935 CMR 500.000.

In accordance with 935 CMR 500.105(2), all of TSC Operations's current owners, managers and

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employees that are involved in the handling and sale of marijuana will successfully complete a Responsible Vendor Training Program, and once designated a “Responsible Vendor”. Once a marijuana establishment is designated a Responsible Vendor, all of TSC Operations’s agents that are involved in the handling and sale of marijuana for adult use will successfully complete the Basic Core Curriculum within 90 days of hire. This program shall then be completed at a minimum of eight (8) hours by TSC Operations’s agents annually, with the exception for agents classified as Administrative Employees, may participate in the Responsible Vendor Training Program on a voluntary basis. TSC Operations shall maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b)(4)(g). 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 spotting and confiscating fraudulent ID; and key state and local laws.

All employees of TSC Operations 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 TSC Operations 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 TSC Operations. Basic on-the-job training TSC Operations 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. TSC Operations shall maintain records of compliance with all training requirements noted above. Such records shall be maintained for four years and TSC Operations 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, TSC Operations’s personnel records will be available for inspection by the Commission, upon request. TSC Operations’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 TSC Operations 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 TSC Operations’s marijuana establishment agents. Such

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records shall be maintained for at least 12 months after termination of the individual's affiliation with TSC Operations 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;
 - 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 Training Program and in-house training for TSC Operations agents required under 935 CMR 105(2).
3. A staffing plan that will demonstrate accessible business hours and safe conditions;
4. Personnel policies and procedures, including at a minimum, the following:
 - a. Code of Ethics;
 - b. Whistle-blower policy.
5. All background check reports obtained in accordance with M.G.L. c. 6 §172, 935 CMR 500.030.

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. TSC Operations understands that in the event that TSC Operations were to close, all records will be kept for at least two years at the expense of TSC Operations and in a form and location acceptable to the commission.

QUALIFICATIONS AND TRAINING

TSC Operations, LLC (“TSC Operations”) shall, pursuant to 935 CMR 500.105(2)(a), ensure that all marijuana establishment agents complete the minimum training requirements prior to performing job functions. Marijuana establishment agents will receive a total of eight hours of training that will be tailored to the role and responsibilities of the job function at TSC Operations. Marijuana establishment agents will be trained for one week before acting as an agent. At a minimum, marijuana establishment agents shall receive a total of eight hours of on-going training annually. New marijuana establishment agents will receive employee orientation prior to beginning work with TSC Operations. 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)(1), all current marijuana establishment agents of TSC Operations involved in the handling and sale of marijuana at the time of licensure or licensure renewal, will successfully complete Responsible Vendor Training (“RVT”) Program, and be designated a “responsible vendor.” In accordance with 935 CMR 500.105(2)(b)(1)(a-c), a marijuana establishment agent at TSC Operations will be enrolled in the Basic Core Curriculum of the RVT program, and successfully complete this program within 90 days of hire. Upon the completion of the Basic Core Curriculum, the marijuana establishment agent will be eligible to enroll in the Advance Core Curriculum if TSC Operations deems appropriate. Administrative employees at TSC Operations, that do not handle or sell marijuana, may voluntarily participate in the four-hour RVT requirement, but may take a Responsible Vendor Training Program.

TSC Operations will comply with 935 CMR 500.105(2)(b)(3) by requiring all marijuana establishment agents who have completed the Basic Core Curriculum, and are involved in the handling and sale of marijuana enroll in and complete the four-hour RVT requirement annually. This will ensure that TSC Operations maintains its designation as a Responsible Vendor.

TSC Operations shall maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(a)(5). Responsible vendor training shall include: marijuana’s effects on the human body; diversion prevention and prevention of sales to minors; compliance with seed-to-sale tracking requirements; identifying acceptable forms of ID along with spotting and confiscating fraudulent ID; and key state and local laws.

All of TSC Operations’s employees will be registered as marijuana establishment agents, in accordance with 935 CMR 500.030. All TSC Operations employees will be duly registered as marijuana establishment agents and have to complete a background check in accordance with 935 CMR 500.030(2). All registered agents of TSC Operations shall meet suitability standards of 935 CMR 500.800.

Training will be recorded and retained in marijuana establishment agents’ files. TSC Operations shall retain all training records for at least four (4) years as required by 935 CMR 500.105(2)(a)(5). All marijuana establishment agents will have continuous quality training and a minimum of 8 hours annual on-going training.

QUALITY CONTROL AND TESTING

Pursuant to 935 CMR 500.160, TSC Operations, LLC (“TSC Operations” 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 Marijuana, 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.

Pursuant to 935 CMR 500.130(4)(a), TSC Operations shall retain all records of purchases from any manufacturer or supplier of any ingredient, additive, device, component part or other materials obtained by the Product Manufacturer in relation to the manufacturing of Marijuana Vaporizer Devices and such records shall be made available to the Commission on request. TSC Operations will make objectively reasonable efforts to identify and maintain records of the name and business address of the manufacturer of any cartridge, battery, atomizer coil, hardware or other component of Marijuana Vaporizer Products manufactured by the Licensee. Further, TSC Operations will, on request by the Commission, identify the materials used in the device’s atomizer coil (e.g., titanium, titanium alloy, quartz, copper, nichrome, kanthal, or other specified material) or state if such information cannot be reasonably ascertained in accordance with 935 CMR 500.130(4)(b). In addition, a copy of the Certificate of Analysis for each thickening agent, thinning agent or terpene infused or incorporated into a Marijuana Vaporizer Device during production will be retained by TSC Operations and provided as a part of a wholesale transaction with any Marijuana Retailer or MTC, and will provide the recipient with the information insert as established in 935 CMR 500.130(4)(c).

TSC Operations 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 TSC Operations for at least one year in accordance with 935 CMR 500.160(5). All transportation of marijuana to or from testing facilities shall comply with 935 CMR 500.105(13) and any marijuana product returned to TSC Operations by the testing facility will be disposed of in accordance with 935 CMR 500.105(12). TSC Operations 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.

TSC Operations’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 TSC Operations staff will be trained and ensure that marijuana and marijuana products are handled with the appropriate food handling and sanitation standards. TSC Operations will ensure the proper equipment and storage materials, including adequate and convenient hand washing facilities; food-grade stainless steel tables; and temperature- and

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humidity- control storage units, refrigerators, and freezers.

TSC Operations'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 TSC Operations 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.

Pursuant to 935 CMR 500.130(9), TSC Operations will provide a quality control sample of marijuana flower to its employees for the purpose of ensuring product quality and determining whether to make the product available to consumers. Such quality control samples will not be consumed by TSC Operations staff on the premises, be sold to another licensee or consumer, and will be tested in accordance with 935 CMR 500.160. All quality control samples provided to TSC Operations staff will be assigned a sequential alphanumeric identifier and entered into the Seed-to-Sale SOR in a manner determined by the Commission, and will be designated as a "Quality Control Sample." All quality control samples will have a label affixed to them in accordance with 935 CMR 500.130(9)(e). Upon providing a quality control sample to TSC Operations staff, TSC Operations will record the reduction in quantity of the total weight or item under the alphanumeric sequence associated with the quality control sample, the date and time the sample was given to the employee, the agent registration number of the employee receiving the sample, and the name of the employee.

All TSC Operations 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(3)(b)(2). All phases of product manufacturing will take place in a limited access area. 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), TSC Operations will ensure that only the leaves and flowers 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

TSC Operations 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.

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Any spoiled, contaminated, dirty, spilled, or returned marijuana products are considered marijuana waste and will follow TSC Operations 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), TSC Operations shall provide adequate lighting, ventilation, temperature, humidity, space and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110. TSC Operations 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. TSC Operations 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 TSC Operations storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.

TSC Operations 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 TSC Operations for no less than one year in accordance with 935 CMR 500.160(3).

Pursuant to 935 CMR 500.160(11), 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.

TSC Operations 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).

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

RECORD KEEPING PROCEDURES

TSC Operations, LLC (“TSC Operations”) records shall be available to the Cannabis Control Commission (“CCC”) upon request pursuant to 935 CMR 500.105(9). TSC Operations 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 TSC Operations, in accordance with 935 CMR 500.105(9)(d)(2). Additionally, business records will be maintained in accordance with 935 CMR 500.104(9)(e) as well as waste disposal records pursuant to 935 CMR 500.105(9)(f), as required under 935 CMR 500.105(12). TSC Operations 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

In accordance with 935 CMR 500.105(9)(e), the following business records shall be maintained:

1. Assets and liabilities;
2. Monetary transactions;
3. Books of accounts;
4. sales records; and
5. Salary and wages paid to each employee.

VISITOR LOG

TSC Operations 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

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for inspection by the Commission at all times.

REAL-TIME INVENTORY RECORDS

TSC Operations 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 all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal, in accordance with 935 CMR 500.105(8)(c) and 935 CMR 500.105(8)(d). Real-time inventory records may be accessed via METRC, the Commonwealth's seed-to-sale tracking software of record. TSC Operations 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

TSC Operations 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(13)(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. TSC Operations will maintain records of all manifests.

INCIDENT REPORTS

TSC Operations 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(9). 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.

TSC Operations shall, within ten calendar days, provide notice to the Commission of any

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incident described in 935 CMR 500.110(9)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified. TSC Operations 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 TSC Operations 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 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 500.105(13). TSC Operations shall retain all transportation logs for no less than a year and make them available to the Commission upon request.

SECURITY AUDITS

TSC Operations 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(10). 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 TSC Operations's security system, TSC Operations will also submit a plan to mitigate those concerns within ten business days of submitting the audit.

CONFIDENTIAL RECORDS

TSC Operations 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)(l). 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 TSC Operations's sole expense and in a form and location acceptable to the Commission, pursuant to 935 CMR 500.105(9)(g).

RESTRICTING ACCESS TO AGE 21 OR OLDER

TSC Operations, LLC (“TSC Operations” 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. 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 validly issued driver’s license;
 - c. A government-issued identification card;
 - d. A government-issued passport; and
 - e. A United States-issued military identification card.

SAFETY PLAN

TSC Operations, LLC (“TSC Operations” or “the Company”) is a marijuana establishment as defined by 935 CMR 500.002. The Company sets forth the following standard operating procedures for the safety plan of all marijuana and marijuana-infused products pursuant to the Cannabis Control Commission’s (the “Commission”) regulations at 935 CMR 500.101(1) in addition to 935 CMR 500.101(3)(c). The regulations require that the marijuana establishment provide a detailed summary of operating policies and procedures including a safety plan for the Manufacture and production of Marijuana Products including, but not limited to, sanitary practices in compliance with 105 CMR 590.000: State Sanitary Code Chapter X – Minimum Sanitation Standards for Food Establishments. TSC Operations is committed to safely providing quality products.

Quality Control, Sanitation, Safety and Health Standards

Health, safety and sanitation are critical components of the manufactured cannabis products facility and all applicable laws and regulations must be strictly adhered to. General health, safety and sanitary standards will be discussed in this section.

A facility shall comply with state and county health, safety, and sanitation regulations prescribed in 105 CMR 590.000 and 935 CMR 500.101(1) and may be subject to inspection to affirm that no health or safety concerns are present which may contaminate the products.

State Regulations

The manufactured cannabis products facility will be in full compliance with all applicable state and local laws and regulations regarding health, safety and sanitation. It will be the responsibility of the manufactured cannabis products facility manager to insure the creation and implementation of policies for regulatory compliance.

General Standards

Manufactured cannabis

- The facility shall manufacture cannabis products such as bubble hash, hash, oils and oil extracts, tinctures.
- The facility will establish and maintain a written policy and procedure that includes, but is not limited to:
 - Safe and appropriate use of manufacturing equipment;
 - Safe and appropriate storage of materials used to produce manufactured cannabis products;

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- Effective training and monitoring of employees and subcontractors who participate in the production of manufactured cannabis products;
- Adequate protocols for laboratory testing of manufactured cannabis products;
- Providing a description of the types, forms and shapes, colors, and flavors of Marijuana Products that the TSC Operations intends to produce;
- A sample of any unique identifying mark that will appear on any product produced by the TSC Operations as a branding device;
- A detailed description of the TSC Operations's proposed plan for obtaining marijuana from a licensed marijuana establishment.
- Safe and appropriate storage and disposal or destruction of manufactured cannabis products at all stages of production and sale;

General Sanitary Requirements

In accordance with 935 CMR 500.105 (3), our marijuana production facility will take all reasonable measures and precautions to ensure the following:

- That any person who, by medical examination or supervisory observation, is shown to have, or appears to have, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination for whom there is a reasonable possibility of contact with preparation surfaces for cannabis or cannabis-infused product shall be excluded from any operations which may be expected to result in such contamination until the condition is corrected;
- That hand-washing facilities shall be adequate and convenient and be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the licensed premises and/or in cannabis-infused product preparation areas and where good sanitary practices require employees to wash and/or sanitize their hands, and provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
- That all persons working in direct contact with preparation of cannabis or cannabis product shall conform to hygienic practices while on duty, including but not limited to:
 - Maintaining adequate personal cleanliness;
 - Washing hands thoroughly in an adequate hand-washing area(s) before starting work, prior to engaging in the production of a cannabis concentrate or manufacture of a cannabis-infused product and at any other time when the hands may have become soiled or contaminated; and
 - Refraining from having direct contact with preparation of cannabis or manufactured cannabis product if the person has or may have an illness, open lesion, including boils, sores, or infected wounds, or any other

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abnormal source of microbial contamination, until such condition is corrected.

- There will be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.
- Litter and waste will be properly removed and the operating systems for waste disposal will be maintained in an adequate manner so that they do not constitute a source of contamination in areas where cannabis is exposed, pursuant to 935 CMR 500.105(12).
- Floors, walls and ceilings will be constructed in such a manner that they may be adequately cleaned and kept clean and in good repair.
- There will be adequate safety lighting in all processing and storage areas, as well as, areas where equipment or utensils are cleaned.
- There will be adequate screening or other protection against the entry of pests. Rubbish shall be disposed of so as to minimize the development of odor and minimize the potential for the waste becoming an attractant, harborage or breeding place for pests.
- Buildings, fixtures and other facilities will be maintained in a sanitary condition.
- All toxic cleaning compounds, sanitizing agents, compounds, and solvents used in the protection against contamination of cannabis concentrates will be identified, and may not be held or stored in an area containing products used in the cultivation of marijuana. The Commission may require the TSC Operations to demonstrate the intended and actual use of any toxic items found on the premises.
- All contact surfaces, including utensils and equipment used for the preparation of cannabis or cannabis-infused product shall be cleaned and sanitized as frequently as necessary to protect against contamination. Equipment and utensils shall be designed and shall be of such material and workmanship as to be adequately cleanable, and shall be properly maintained.
- The water supply shall be sufficient for the necessary operations intended and shall be derived from a source that is a regulated water system. Private water supplies shall be derived from a water source that is capable of providing a safe, potable and adequate supply of water to meet the facility's needs.
- Plumbing shall be of adequate size and design, and adequately installed and maintained, to carry sufficient quantities of water to the required locations throughout the facility. Plumbing shall properly convey sewage and liquid disposable waste from the facility. There shall be no cross connections between the potable and waste water lines.
- TSC Operations will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair.

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- All operations in the receiving, inspecting, transporting, segregating, preparing, producing, packaging and storing of cannabis and manufactured cannabis products shall be conducted in accordance with adequate sanitation principles.
- Each facility center shall provide its employees with adequate and readily accessible toilet facilities that are maintained in a sanitary condition and good repair.
- The storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
- Cannabis that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms.
- Permitted facility centers shall immediately allow the Commission to inspect the premises and all utensils, fixtures, furniture, machinery and devices used for preparing manufactured cannabis products.
- A facility center that prepares manufactured cannabis products for sale or distribution at a dispensing organization shall be under the operational supervision of a certified food service sanitation manager.
- All vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety shall be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements under 21 CFR 1.908(c).

Per 935 CMR 500.130 TSC Operations will ensure that production of edibles will take place in compliance with the following:

(a) All Edibles shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: *State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*; and

(b) Any Marijuana Product that is made to resemble a typical food or Beverage product will be packaged and labeled as required by 935 CMR 500.105(5) and (6) as outlined in our Types of Product Plan.

(c) TSC Operations will meet all applicable environmental laws, regulations, permits and other applicable approvals including, but not limited to, those related to water quality and quantity, wastewater, solid and hazardous waste management and air pollution control, including prevention of odor and noise pursuant to 310 CMR 7:00: *Air Pollution Control*, and to use additional best management practices as determined by the Commission in consultation with the working group established under St. 2017, c. 55, § 78(b) or applicable

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departments or divisions of the EOEAA to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts.

(d) When selling or otherwise transferring marijuana to another Marijuana Establishment, TSC Operations will provide documentation of its compliance, or lack thereof, with the testing requirements of 935 CMR 500.160, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect Marijuana Products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.

- i. TSC Operations will retain all records of purchases from any manufacturer or supplier of any ingredient, additive, device, component part or other materials obtained by TSC Operations in relation to the manufacturing of marijuana vaporizer devices and such records shall be made available to the Commission upon request.
- ii. TSC Operations will make objectively reasonable efforts to identify and maintain records of the names and business address of the manufacturer of any cartridge, battery, atomizer coil, hardware or other component of marijuana vaporizer products manufactured by the Licensee. In addition, the TSC Operations will, on request by the Commission, identify the materials used in the device's atomizer coil (e.g., titanium, titanium alloy, quartz, copper, nichrome, kanthal, or other specified material) or state if such information cannot be reasonably ascertained.
- iii. A copy of the Certificate of Analysis for each thickening agent, thinning agent or terpene infused or incorporated into a marijuana vaporizer device during the production will be retained by the TSC Operations and provided as a part of a wholesale transaction with any Marijuana Retailer or Marijuana Treatment Center.
- iv. If TSC Operations wholesales marijuana vaporizer devices to a Marijuana Retailer or Marijuana Treatment Center will provide the recipient with the informational insert required by 935 CMR 500.105(5)(c) or the necessary information to produce such an insert and the appropriate labeling information required by the regulations.

Product Recall Plan

If the facility's cannabis or manufactured cannabis product proves to be non-conforming upon retest the facility will initiate a recall in accordance with the guidelines put forth by the CPSC. Manufacturers, importers, distributors and retailers of consumer goods are liable for the products they provide to consumers and face the potential of product recalls for potentially dangerous or hazardous products. The same is true for TSC Operations as a manufacturer and/or retailer of consumer cannabis products. As a result, the company

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may need to conduct a product recall in the future. For consumer products, the recall process is regulated by the CPSC, for all intents and purposes TSC Operations recall plan will follow the guidelines of the CPSC.

Firms often learn of potential product safety problems at an early stage. For this reason, companies involved in the manufacture, importation, distribution, or sale of consumer products should develop a system for maintaining and reviewing information about their products that might suggest that their product has a defect or poses an unreasonable risk. Such information includes, but is not limited to, consumer complaints, reports of production problems, product testing, or other critical analyses of products.

Experts have shown that one of the best ways to ensure that a product recall is effective is to have a recall plan already in place and to execute the plan as quickly as possible. A well- thought out, well-executed recall plan can save lives and prevent injuries in addition to limiting damage to our company's brand and bottom line.

The CPSC has compiled resources to assist companies that manufacture, import, distribute, retail, or otherwise sell consumer products. The CPSC has developed a Recall Handbook that can be utilized in case a product recall needs to be ordered. The Recall Handbook details how to recognize potentially hazardous consumer products as soon as possible. The book explains how to develop and implement a "*corrective action plan*" (called a CAP) to address the hazards; it explains the CPSC's Fast Track Program.

The Recall Handbook also discusses how to communicate recall information to consumers and how to monitor product recalls. The Consumer Product Safety Commission's Recall Handbook will be a valuable tool utilized by TSC Operations if the need for a product recall ever arises.

The Recall Handbook should be referenced to determine exact protocol for recall and the requirements from the Consumer Product Safety Commission. The Recall Handbook can be obtained online from <http://www.cpsc.gov/PageFiles/106141/8002.pdf>. TSC Operations will carefully review the Recall Handbook in order to: become familiar with their reporting requirements under sections 15(b) and 37 of the Consumer Product Safety Act, and Section 102 of the Child Safety Protection Act, Pub. L. 103-267; help learn how to recognize potentially hazardous consumer products as soon as possible; and develop and implement "*corrective action plans*" that address the hazards if we discover we have manufactured, imported, distributed, or retailed such products.

Product Database and Catalogue

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Pursuant to 935 CMR 500.130(5)(h) and 935 CMR 500.130(6), TSC Operations will adopt policies and procedures that will establish a catalogue identifying all types of marijuana products actively manufactured at the facility. The catalogue will include a description of the product, photograph or illustration, packaging design, and dosage amounts, including expected cannabinoid profile.

In addition, TSC Operations, will provide the following information about the finished marijuana products it intends to produce and make available at wholesale to a Marijuana Retailer prior to commencement of operations, after the TSC Operations has received a provisional license but prior to receiving a certificate to commence operations. The following information may be used by the Commission for its product database:

- a. The TSC Operations will provide the following to the Commission:
 - i. Marijuana product type;
 - ii. Marijuana product brand name;
 - iii. List of direct ingredients;
 - iv. List of indirect ingredients;
 - v. Serving size, including a description of what constitutes a serving size for product that is not already a single serving;
 - vi. Potency;
 - vii. A photograph of a finished marijuana product outside of but next to the marijuana product's packaging, including any external or internal packaging, provided that where single servings of a multi-serving product are unable to be easily identified because of its form, then a description of what constitutes a single serving will be provided, and where an Edible cannot be stamped due to size or coating, then a photograph of the Edible outside of but next to its external and internal packaging such as the wrapper, and labeling information for the Edible;
 - viii. A photograph of the marijuana product inside the packaging; and
 - ix. A list of marijuana products to be sold based on anticipated or executed agreements between the TSC Operations and Marijuana Retailer.

The TSC Operations will submit photographs in an electronic file in a JPEG format with a minimum photo resolution of 640 x 480 and print resolution of 300 DPI. Photographs will be taken against a white background.

The TSC Operations will provide information required under 935 CMR 500.130(6)(a) for each marijuana product that it produces prior to the product being made available for sale through a licensed Marijuana Retailer or Marijuana Treatment Center and will update the information whenever a substantial change to the product information occurs. Substantial changes, including the changes to the foregoing information listed in (a)(i-ix), will be submitted to the Commission for inclusion in the product database prior to the transfer of marijuana products.

Recall Regulations

TSC Operations shall establish, maintain and comply with the written policies and procedures contained in 935 CMR 500.105(1), and will maintain written policies and

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procedures for the production or distribution of marijuana products, We will include in our written policies and procedures a process for the following:

- Methods for identifying, recording and reporting diversion, theft and loss, and for correcting all errors and inaccuracies in inventories. The policies and procedures, at a minimum, shall comply with 935 CMR 500.105(8).
- Policies and procedures for handling mandatory and voluntary recalls of marijuana products. The procedure shall be adequate to deal with:
 - Recalls due to any action initiated at the request of the Commission, and any voluntary action to remove from the market defective or potentially defective cannabis or cannabis infused products, as well as any action undertaken to promote health and safety.; and
- TSC Operations will adopt policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana or marijuana products are segregated from other marijuana and destroyed. Such procedures will include written documentation of the disposition of the marijuana or marijuana products. The policies and procedures, at a minimum will comply with 935 CMR 500.105(12).

Recall

TSC Operations will establish the following policy for communicating a recall notice for marijuana, marijuana-infused products or a marijuana products that have been shown to present a reasonable or a remote probability that use of or exposure to the product will cause serious adverse health consequences. TSC Operations's policy will include:

1. TSC Operations will establish a mechanism to contact all customers who have, or likely have, obtained the product from the facility. The communication will include the following information on the policy for return of the recalled product:
 - i. The Client will provide a notice to all customers that are suspected of having purchased the marijuana or marijuana products, andThe TSC Operations will provide additional outreach as necessary and appropriate to inform consumers of the recall.
 - ii. The TSC Operations will inform the Commission within 24 hours.

Any recalled cannabis product will be disposed of in accordance with waste disposal procedures.

When to Recall Cannabis Products

As a manufacturer, distributor, and/or retailer of consumer products, TSC Operations has a legal obligation to immediately report the following types of information to the Consumer Product Safety Commission:

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1. A defective product that could create a substantial risk of injury to consumers; and
2. A product that creates an unreasonable risk of serious injury or death.

How to Recall Cannabis Products

TSC Operations will develop a recall plan following guidance from the Recall Handbook provided by the CPSC. Once the need for a product recall has been determined, TSC Operations will proceed with the product recall Corrective Action Plan (CAP). If the need for a product recall arises, we will have inventory management systems in place to determine and pinpoint which products to recall, how many of those products are in the supply chain, and will be able to determine exactly where those products are within the supply chain. The inventory management systems and procedures required by State Regulations will ensure a streamlined recall process if ever necessary.

- **Corrective Action Plan (CAP)**
A corrective action plan is defined as improvements to an organization's processes taken to eliminate causes of non-conformities or other undesirable situations. The goal of a corrective action plan should be to retrieve as many hazardous products from the distribution chain and from consumers as is possible in the most efficient, cost-effective manner. The CAP will outline the procedures and steps TSC Operations needs to take once a product recall is required.
- **Step One: Industry Notification**
If cannabis or manufactured cannabis products are believed to need to be recalled, TSC Operations will contact all wholesale partners and dispensing organizations to make them aware of the situation and the need for product recall. TSC Operations will also contact the Commission within 24 hours of obtaining reportable information. As the wholesaler of the product needing to be recalled, contacting the end users of the recalled product; cannabis consumers, will prove difficult if not impossible. At this stage of the recall, dispensing organizations will need to ensure that they have a proper recall process in place to contact the end users of the product being recalled.
- **Step Two: Public Notification**
Facility center will post notifications about the product recall on its website as well as making partnering facility centers and dispensing organizations aware of the product recall. The actual recalling processes will be handled by the dispensing organizations with help and support from the facility center.

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As the dispensing organization issuing a recall notice it will be important to reach the end users or the recalled product. TSC Operations will post notification about the recall on TSC Operations websites and social media as well as post written notices of the recall on location for customers to view. The recall notice will include all pertinent information regarding the product being recalled, contact information and other information relating to the recall. Information will include but not be limited to:

- Product name
- Product batch number
- Dispensing date range of recalled product
- Dispensing organization locations

Once the recall notification has been issued to all applicable dispensing organizations and cannabis consumers, TSC Operations will wait to receive recalled products from dispensing organizations. Once recalled products have been received, TSC Operations will properly dispose of all recalled products.

- **Step Three: Procurement**
The dispensing organization issuing a product recall to cannabis consumers will need to be ready to obtain and secure recalled products from consumers. Consumers should be able to bring in the products being recalled to the dispensing organization's location. It will be at the dispensing organization's discretion whether to issue a refund, replace the recalled product at no cost, or to take other measures.
- **Step Four: Documentation and Record Retention**
TSC Operations will maintain all documentation and records regarding any and all product recalls issued.
- **Step Five: Disposal**
TSC Operations will ensure that any and all recalled cannabis products are disposed of according to all state and local regulations. TSC Operations will follow waste destruction and disposal procedures outlined below for proper disposal of recalled cannabis and manufactured cannabis.

Emergency Protocol

TSC Operations will establish emergency procedures and protocols to be implemented organization wide. Employees of the organization will be fully trained on emergency

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protocols. Emergencies protocols will be developed for robbery or theft, fire emergency, chemical spill and for other emergencies as needed.

- Pursuant to 935 CMR 500.130(5)(i), the TSC Operations will adopt and incorporate policies and procedures for ensuring safety in all processing activities and the related uses of extraction equipment in compliance with the standards set forth in 527 CMR 1.00.
- Notwithstanding a stricter municipal or state regulation, the TSC Operations will identify the method of extraction on a physical posting at all entrances of the marijuana establishment. The posting will be a minimum of 12" x 12" and identify the method of extraction in lettering no smaller than one inch in height. TSC Operations will post a copy of a permit to keep, store, handle or otherwise use flammable and combustible materials at each place of operation within the facility.

Robbery or Theft

- If being robbed at gunpoint or if you feel your life is in danger, comply with all requests from the perpetrator. Give them whatever they ask for.
- Try to signal for help through security panic buttons provided or through the panic button or police services button located on the alarm panel.
- Contact police as soon as possible.
- Notify any required state or local authorities.
- If any marijuana is stolen, we will secure, inventory, and document all remaining product.

Fire Emergency

- If a fire is small and isolated, try to exhaust the fire with one of the fire extinguishers
- In case of a fire emergency, dial 911 for Fire Department or push the symbol on the alarm panel for fire emergency.

Chemical Spill

- Try to use the chemical spill kit for smaller incidents of chemical spill.
- If the chemical spill is large or you do not know how to handle the situation, get the facility manager to handle the situation.

Other Emergencies

- Contact 911 for break-ins or burglaries.
- Contact any required state or local authority in cases of theft, break-ins or burglaries

DIVERSITY PLAN

TSC Operations, LLC (“TSC Operations” 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 TSC Operations a leader and champion of diversity, both locally and throughout the broader Massachusetts cannabis industry.

TSC Operations’ commitment to diversity is reflected in the following Goals, which shall 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 One:

Achieve at least the following goals for our staffing needs from individuals from the following groups:

Veterans - 10%

People with Disabilities - 5%

LGBTQ+ individuals - 5%

Women - 10%

People of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people - 10%

Programs to Achieve Diversity Goal One:

Increase diversity of the make-up of our staff by actively seeking out people who are members of the groups listed in Goal One, through both in-house hiring initiatives and annual advertisements in the *Worcester Telegram & Gazette* at least once a year and as frequently as needed as staffing needs dictate.

Metrics and Measurements for Diversity Goal One:

TSC Operations shall evaluate its personnel files on a semi-annual basis to determine how many employees are members of the groups listed in Goal One occupy positions within the company and that number shall be divided by TSC Operations’ total staffing at its facility to determine the percentage achieved.

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Goal Two: Enhance workforce diversity by contracting with diverse businesses. TSC Operations will strive to employ at least the following percentages of its contractors, subcontractors, and suppliers from the following groups specified in the paragraph below:

- Minority Business Enterprise - 5%
- Women Business Enterprise - 5%
- Veteran Business Enterprise - 5%
- LGBT Business Enterprise - 5%
- Disability-Owned Business Enterprise - 5%

Programs to Achieve Diversity Goal Two:

TSC Operations LLC will make good faith efforts to employ contractors, subcontractors, and suppliers who are listed in the Commonwealth of Massachusetts Directory of Certified Businesses as being a business from the categories above, with particular consideration given to businesses classified as Disadvantaged Business Enterprises.

TSC Operations will seek to have diversity across the listed demographic groups and measure those against the primary ownership of all of our contracted partners. We will strive to not limit our contractual relationships to a single disadvantaged business entity (“DBE”) category and will instead seek a variety of qualifying businesses to contract with and will judge the mix of those relationships: i.e. we don’t want our contractors to all fall within the same category of DBE and instead will seek to find companies from businesses owned by members of the categories listed above.

Metrics and Measurements for Diversity Goal Two:

TSC Operations shall maintain a list of active contractors, subcontractors, and suppliers and compare that list annually to the Massachusetts Directory of Certified Businesses to determine progress towards the goals listed above.

Our goals are objectively reasonable.

TSC Operations’ staffing goals at our Establishment are objectively reasonable because of the facts (the demographics listed in the paragraph above) and our ability to advertise job positions in the *Worcester Telegram & Gazette*.

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

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TSC Operations 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.

TSC Operations 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.