



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR284518
Original Issued Date: 09/01/2022
Issued Date: 09/01/2022
Expiration Date: 09/01/2023

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Uma Flowers Lunenburg LLC

Phone Number: 617-784-4046
Email Address: priyanka@umaflores.co

Business Address 1: 2 Tarbell St	Business Address 2:
Business City: Pepperell	Business State: MA
Business Zip Code: 01463	
Mailing Address 1: 2 Tarbell St	Mailing Address 2:
Mailing City: Pepperell	Mailing State: MA
Mailing Zip Code: 01463	

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

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

PRIORITY APPLICANT

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

RMD INFORMATION

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

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 91	Percentage Of Control: 91
Role: Owner / Partner	Other Role:
First Name: Priyanka	Last Name: Patel
Suffix:	

Gender: Female

User Defined Gender:

What is this person's race or ethnicity?: Asian (Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese)

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Priyanka

Last Name: Patel

Suffix:

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$75000 Percentage of Initial Capital: 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Priyanka

Last Name: Patel

Suffix:

Marijuana Establishment Name: Uma Flowers LLC

Business Type: Marijuana Retailer

Marijuana Establishment City: Pepperell

Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 43 Summer st

Establishment Address 2:

Establishment City: Lunenburg

Establishment Zip Code: 01462

Approximate square footage of the establishment: 3100

How many abutters does this property have?: 13

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	20211221112318523.pdf	pdf	61e48b14ea0b000858e84905	01/16/2022
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant with Local Zoning.pdf	pdf	61e493f235cb3e08f7218731	01/16/2022
Community Outreach Meeting Documentation	COM attestation.pdf	pdf	620bf5a38d09e508d611954c	02/15/2022

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Updated_Plan to Positively Impact Areas of Disproportionate Impact.pdf	pdf	620eac42e95b8c088881b91a	02/17/2022

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

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

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	12-17-21 - MA - Initial Filing - Uma Flowers Lunenburg LLC (1).pdf	pdf	61e9fe79ea5b88086e76c55c	01/20/2022
Department of Revenue - Certificate of Good standing	certificate of goodstanding LUN.pdf	pdf	61ed7035a828d708f050d31b	01/23/2022
Secretary of Commonwealth - Certificate of Good Standing	Document-2022-01-25-100546.pdf	pdf	61f08f867c2bdd089a1f20e4	01/25/2022
Department of Revenue - Certificate of Good standing	Unemployment Assistance Certification Form_Uma Flowers Lunenburg.pdf	pdf	61f0addb7c2bdd089a1f2103	01/25/2022
Bylaws	Operating Agreement of Uma Flowers Lunenburg LLC.v.1.26.22.1.pdf	pdf	61f2dde3879c73091c815772	01/27/2022

No documents uploaded

Massachusetts Business Identification Number: 001548359

Doing-Business-As Name: Uma Flowers

DBA Registration City: Lunenburg

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	Proposed Timeline.pdf	pdf	61ea043f8dbcc3090663873a	01/20/2022
Plan for Liability	General Liability Uma Flowers Lunenburg Letter	pdf	61f03f74d3dbc608cffa362b	01/25/2022

Insurance	1-25-22.pdf			
Business Plan	UFLunenburg_Business Plan.pdf	pdf	628b9bf2eb816b0008634d8f	05/23/2022

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	UFLunenburg_Plan for obtaining marijuana or marijuana products.pdf	pdf	61ea05da8d09e508d6111032	01/20/2022
Restricting Access to age 21 and older	Restricting Access to age 21 and older.pdf	pdf	61ea06e9f2351e085f72438a	01/20/2022
Security plan	Security Plan (1).pdf	pdf	61ea07b95099080851f32f1e	01/20/2022
Prevention of diversion	Prevention of Diversion (1).pdf	pdf	61ea082ae95b8c0888811f83	01/20/2022
Storage of marijuana	Storage of marijuana.pdf	pdf	61ea086af2351e085f72438e	01/20/2022
Transportation of marijuana	Transportation of Marijuana (1).pdf	pdf	61ea08c18dbcc3090663873f	01/20/2022
Inventory procedures	Inventory Procedures.pdf	pdf	61ea08efa828d708f050ca75	01/20/2022
Quality control and testing	Quality Control and Testing.pdf	pdf	61ea094ee95b8c0888811f87	01/20/2022
Dispensing procedures	Dispensing Procedures.pdf	pdf	61ea097bf2351e085f724392	01/20/2022
Personnel policies including background checks	Personnel Policies Including Background Checks.pdf	pdf	61ea0a1b8d09e508d6111038	01/20/2022
Record Keeping procedures	Recordkeeping Procedures.pdf	pdf	61ea0a57ea0b000858e862df	01/20/2022
Maintaining of financial records	Maintaining of Financial Records.pdf	pdf	61ea0b4c879c73091c8131f0	01/20/2022
Qualifications and training	Qualifications and Training.pdf	pdf	61ea0be435cb3e08f721a0bc	01/20/2022
Energy Compliance Plan	Energy Compliance Plan (2).pdf	pdf	61ea1048dc96b108e5515130	01/20/2022
Diversity plan	Updated_Diversity Plan.pdf	pdf	6286b9b43bea2b0008c15df9	05/19/2022

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

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

Notification:

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 10:00 AM	Monday To: 9:00 PM
Tuesday From: 10:00 AM	Tuesday To: 9:00 PM
Wednesday From: 10:00 PM	Wednesday To: 9:00 PM
Thursday From: 10:00 AM	Thursday To: 9:00 PM
Friday From: 10:00 AM	Friday To: 10:00 PM
Saturday From: 10:00 AM	Saturday To: 10:00 PM
Sunday From: 10:00 AM	Sunday To: 6:00 PM

Host Community Agreement Certification Form

Instructions

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

Certification

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

1. Name of applicant:

Uma Flowers Lunenburg LLC

2. Name of applicant's authorized representative:

Priyanka Patel

3. Signature of applicant's authorized representative:

Priyanka Patel

4. Name of municipality:

Lunenburg, MA

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

Heather Lemieux, Town Manager



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

Heather Lemieux

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

hlemieux@lunenburgonline.com

8. Host community agreement execution date:

12/7/21



PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING (LUNENBURG)

Uma Flowers Lunenburg LLC (“Uma Flowers”) will remain compliant at all times with the local zoning requirements set forth in the Town of Lunenburg’s Zoning Bylaw. In accordance with Lunenburg’s Recreational Marijuana Zoning Bylaw Amendment (adopted at Annual Town Meeting on May 6, 2019), Uma Flowers’ proposed Marijuana Retailer is located in the Commercial Zoning District designated for Marijuana Retailer Establishments.

In accordance with the Recreational Marijuana Zoning Bylaw Amendment, Uma Flowers’ proposed Marijuana Retailer Establishment is not located within 500 feet of a pre-existing public or private school providing education in kindergarten or any of grades pre-k through 12, day care center, or any place where children commonly congregate including, but not limited to, facilities in which children gather for a particular purpose in a structured or scheduled manner, or which are dedicated to use by children such as playgrounds, youth service programs, youth sports facilities, dance school and gymnastic schools.

As required by the Recreational Marijuana Zoning Bylaw Amendment, Uma Flowers will apply for a Special Permit and/or Site Plan Approval, as applicable, from the Planning Board. A special permit shall have a term limited to no longer than the duration of the applicant’s ownership or lease of the premises to be used for the Marijuana Establishment. A special permit shall lapse if a final license has not been issued by the Commission pursuant to CMR 500.103 within one year of issuance of the special permit.

Uma Flowers will apply for any other local permits required to operate a Marijuana Retailer at the proposed location. Uma Flowers will comply with all conditions and standards set forth in any local permit required to operate a Marijuana Retailer at Uma Flowers’ proposed location.

Uma Flowers has already attended several meetings with various municipal officials and boards to discuss Uma Flowers’ plans for a proposed Marijuana Retailer and has executed a Host Community Agreement with the Town of Lunenburg. Uma Flowers will continue to work cooperatively with various municipal departments, boards, and officials to ensure that Uma Flowers’ Marijuana Retailer remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

Community Outreach Meeting Attestation Form

Instructions

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

Attestation

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

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



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

a. Date of publication:

b. Name of publication:

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

a. Date notice filed:

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

a. Date notice(s) mailed:

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:
- The type(s) of ME or MTC to be located at the proposed address;
 - Information adequate to demonstrate that the location will be maintained securely;
 - Steps to be taken by the ME or MTC to prevent diversion to minors;
 - A plan by the ME or MTC to positively impact the community; and
 - 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:

Name of applicant's authorized representative:

Signature of applicant's authorized representative:



Attachment A

Lunenburg senior Tyler Holifield shared his thoughts on Monday.
“I worked really hard last year and all summer. I was the three last

Crossing for allowing us to come in and use their course,” said Gearin. “I also want to thank Mark Testa over at Lakeview Driving. He’s been very welcoming to our team and we really appreciate it.”

Due to Vacation’s “The Officer of the Week” will resume next week September 17th.

Notice is hereby given that Uma Flowers, LLC will hold a Community Outreach Meeting on Tuesday, September 28, 2021 at 7PM EST for a proposed Medical and Adult Use Marijuana establishment to be located at 43 Summer Street, Lunenburg, MA. The meeting will take place at Lunenburg Town Hall located on 17 Main Street Lunenburg, MA 01462.

Those that cannot attend the meeting in person can join the meeting remotely via ZOOM at :

<https://us02web.zoom.us/j/9091740347>. Participants may also dial in by telephone using the toll-free phone number: 877-853-5257 or 888-475-4499 and enter meeting ID: 9091740347#. A copy of the meeting presentation will be made available at least 24 hours prior to the meeting on the town’s website. Interested members of the community will have the opportunity to ask questions and receive answers from company representatives about the proposed facility and operations.

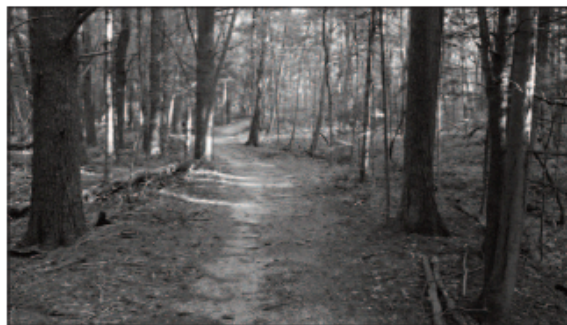
Questions can be submitted in advance by emailing Priyanka@UmaFlowers.co. Also, please visit www.UmaFlowers.co to learn more about Uma Flowers.

The Lane Forest

By Zoe Wilson, Photography by Paul Sarapas

The Lane Forest is one of the newest acquisitions to the lands owned by the Lunenburg Conservation Commission and is approximately 168 acres, with 2.4 miles of public trails. Trail markers are classified by toy dinosaurs, with new yellow trail markings recently added. The trails provide for a family friendly experience. The property also possesses newly constructed bridges across Mulpus Brook and other swampy areas, and around these areas lie beaver dams. Parking is located at the end of Holman Street from Northfield Road, opposite The Peabody Conservation Area. The Lane Property is also connected to the Large Town Forest through the northern part of its trails.

You can download a town wide map of all LCC Trails as well as individual trail maps at www.lunenburgma.gov/boards-commissions-committees/conservation-commission/lunenburg-conservation-lands-trail-maps



Thank you! Thank you so much! Awesome, thanks!

Attachment B

September 2, 2021

Subject: Public Notice of Community Outreach Meeting

To whom it may concern,

Notice is hereby given that Uma Flowers, LLC will hold a Community Outreach Meeting on Tuesday, September 28, 2021 at 7PM EST for a proposed Medical and Adult Use Marijuana establishment to be located at 43 Summer Street, Lunenburg, MA. The meeting will take place at Lunenburg Town Hall located on 17 Main Street Lunenburg, MA 01462.

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Sincerely,



Priyanka Patel, PharmD
Co-Founder



Town Clerk

Town Clerk: Kathryn M. Herrick Assistant Town Clerk: Ellen Griffin

...

(978) 582-4130, (978) 582-4131

kherrick@lunenburgonline.com

Town Manager

Responsibilities Lunenburg's Town Manager is the Chief Administrative and Financial Officer for the town. The duties of the Town Manager are...

(978) 582-4144

hlemieux@lunenburgonline.com

Treasurer & Tax Collector

Treasurer/Tax Collector: Myleen

Mallari, mmallari@lunenburgonline.com Asst. Treasurer: Susan

Murchie: smurchie@lunenburgonline...

978-582-4133, 978-582-4132, 978-582-4130 EXT #2

mmallari@lunenburgonline.com

Veteran's Affairs

Veteran's Agent: David Lauzon Jr. Office Hours Every Tuesday and Thursday from 1:00 - 4:00 P.M. The Veteran Agent's office...

(978) 582-4176, Fax (978) 582-4909


VSO@lunenburgonline.com

Weight And Measures

Stephen E. Cullinane Weights and Measures Inspector Please call (978) 582-8290 for an appointment.

(978) 582-8290

Lunenburg Town Hall

 17 Main Street,
P.O. Box 135
Lunenburg, MA
01462

Additional Links

[My Account](#)

[Online Bill Payer](#)

[Calendar](#)

[Emergency Services](#)

[Resident Services](#)

Public Safety



Let's Connect



Notice of Community Outreach Meeting

8 messages

Priyanka <patel.priy@gmail.com>
To: kherrick@lunenburgonline.com

Wed, Sep 1, 2021 at 3:42 PM

Hello,

This is Priyanka from Uma Flowers. We are a cannabis company looking to open a medical and adult use dispensary on Summer st in Lunenburg. Attached to this email is a Public Notice for a community outreach meeting we are hosting later this month.

Please confirm receipt of this email and the notice.
If there is anything else needed from us, or any questions please don't hesitate to reach out.

Thank you,
Priyanka

 **Lunenburg COM notice.pdf**
602K

Priyanka <patel.priy@gmail.com>
To: Egriffin@lunenburgonline.com

Thu, Sep 2, 2021 at 2:37 PM

Hi

Attached is the notice for our Community Outreach meeting.

Please let me know if you have any questions.

Thanks,
Priyanka

----- Forwarded message -----
From: **Priyanka** <patel.priy@gmail.com>
Date: Wed, Sep 1, 2021 at 3:42 PM
Subject: Notice of Community Outreach Meeting
To: <kherrick@lunenburgonline.com>

Hello,

This is Priyanka from Uma Flowers. We are a cannabis company looking to open a medical and adult use dispensary on Summer st in Lunenburg. Attached to this email is a Public Notice for a community outreach meeting we are hosting later this month.

Please confirm receipt of this email and the notice.
If there is anything else needed from us, or any questions please don't hesitate to reach out.

Thank you,
Priyanka

 **Lunenburg COM notice.pdf**
602K

egriffin@lunenburgonline.com <egriffin@lunenburgonline.com>
To: Priyanka <patel.priy@gmail.com>

Thu, Sep 2, 2021 at 2:50 PM

Received

 UMA LUNENBUR....doc ^

 UFLunenburg_....docx ^

 UMA LUNENBUR....doc ^

 LICENSE CERTIFI....pdf ^

 Agent_-_COVID1....pdf ^

Show All X

Attachment C



September 2, 2021

Subject: Public Notice of Community Outreach Meeting

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Sincerely,

Priyanka Patel, PharmD
Co-Founder



7020 0090 0002 0422 9302

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT

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

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

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

Fitchburg, MA 01420

Certified Mail Fee \$3.75
\$0.00
Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.58

Total Postage and Fees \$4.33

Sent To

Street and Apt. No., or PO Box No.

875 John Rick Hwy #34

Fitchburg, MA 01420

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

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Fitchburg, MA 01420

Certified Mail Fee \$3.75
\$0.00
Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.58

Total Postage and Fees \$4.33

Sent To

Street and Apt. No., or PO Box No.

Dr. May Intosh Road

Brookline, NH 03033

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

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

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Extra Services & Fees (check box, add fee as appropriate)
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200 Belvidere St

Chestnut Hill, MA 02467

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Boston, MA 02116

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\$0.00
Extra Services & Fees (check box, add fee as appropriate)
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Postage \$0.58

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100 Transportation Building 10 Park Plaza

Boston, MA 02116-251 RE DEPT. RM 5150

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

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Fitchburg, MA 01420

Certified Mail Fee \$3.75
\$0.00
Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.58

Total Postage and Fees \$4.33

Sent To

Street and Apt. No., or PO Box No.

72 Lippinck Rd

Fitchburg, MA 01420

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

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

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

Lunenburg, MA 01462

Certified Mail Fee \$3.75
\$0.00
Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.58

Total Postage and Fees \$4.33

Sent To

Street and Apt. No., or PO Box No.

65 Pratt St

Lunenburg, MA 01462

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

Overview

Uma Flowers Lunenburg LLC (“Uma Flowers”) is dedicated to serving and supporting populations falling within areas of disproportionate impact, which the Commission has identified as the following:

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

To support such populations, Uma Flowers has created the following Plan to Positively Impact Areas of Disproportionate Impact (the “Plan”) and has identified and created goals/programs to positively impact past or present residents of the geographic “areas of disproportionate impact.”

Goals

In order for Uma Flowers to positively impact past or present residents of the geographic “areas of disproportionate impact”, Uma Flowers has established the following goals:

1. Giving hiring preferences to individuals from Fitchburg which is a city identified as areas of disproportionate impact by the Commission. The establishment will hire 10% of its staff from Fitchburg.
2. Provide internship opportunities to individuals 21+ and give selection preference to individuals from Fitchburg for the internship opportunity.

Programs

Uma Flowers has developed specific programs to effectuate its stated goals to positively impact past or present residents of geographic “areas of disproportionate impact”. Such programs will include the following:

1. To give hiring preference to individuals from Fitchburg, Uma Flowers will post the job listing on Indeed.com and pay a fee to “promote” the add to target residents from Fitchburg. When giving hiring preference for Fitchburg residents, Uma Flowers will use the United States Census Bureau Fact Finder website to ensure Fitchburg is considered an area of disproportionate impact. The job will be posted at least twice a year.
2. To provide internship opportunities, Uma Flowers will develop an internship program. The program will provide one individual (at a time) a 12-week internship opportunity. The intern will have the opportunity to learn the basic fundamentals to operating and managing an adult-use retail marijuana shop. The intern will shadow staff at different positions within the company to understand the roles and responsibilities of those different positions and to understand how each position impacts the success of the business. At the end of the internship, the individual may be presented the opportunity to join the company as an employee. The internship program will provide 2, 12-week

internships in one year. To give preferences to individuals from Fitchburg, Uma Flowers will post the internship opportunity on Indeed's website and advertise the opportunity on our website. When giving selection preference for Fitchburg residents, Uma Flowers will use the United States Census Bureau Fact Finder website to ensure Fitchburg is considered an area of disproportionate impact.

Measurements

The Director of Diversity & Inclusion will administer the Plan and will be responsible for developing measurable outcomes to ensure Uma Flowers continues to meet its commitments. Such measurable outcomes, in accordance with Uma Flowers' goals and programs described above, include:

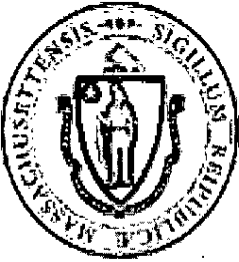
- Percentage or number of applicants hired from Fitchburg
- Number of internships completed in a year

Beginning upon receipt of Uma Flowers' first Provisional License from the Commission to operate a marijuana establishment in the Commonwealth, Uma Flowers will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The Director of Diversity & Inclusion will review and evaluate Uma Flowers' measurable outcomes no less than 3 months to ensure that Uma Flowers is meeting its commitments. Uma Flowers is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

Uma Flowers will make every effort to meet these goals in a non-discriminatory manner.

Acknowledgements

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



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$500.00

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

Certificate of Organization

(General Laws, Chapter 156C)

Identification Number: 001548359

1. The exact name of the limited liability company is: UMA FLOWERS LUNENBURG LLC

2a. Location of its principal office:

No. and Street: 82 WENDELL AVE. STE 100
City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

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

No. and Street: 82 WENDELL AVE. STE 100
City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

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

APPLYING FOR A LICENSE WITH THE CANNABIS CONTROL COMMISSION

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: REGISTERED AGENTS INC.
No. and Street: 82 WENDELL AVE. STE 100
City or Town: PITTSFIELD State: MA Zip: 01201 Country: USA

I, BILL HAVRE OF REGISTERED AGENTS INC., resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

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

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

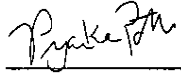
7. The name and business address of the person(s) in addition to the manager(s), authorized to execute documents to be filed with the Corporations Division, and at least one person shall be named if there are no managers.

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
SOC SIGNATORY	PRIYANKA PATEL	109 RAFFAELE DRIVE WALTHAM, MA 02452 USA

To Whom it may concern:

I, Priyanka Patel, Member of Uma Flowers LLC and Uma Flowers Waltham consent to the use of the name "Uma Flowers Lunenburg LLC" for a new business formation in Massachusetts.

Thank you,

A handwritten signature in black ink, appearing to read "Priyanka Patel", is positioned above a horizontal line.

Priyanka Patel - Member

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	PRIYANKA PATEL	109 RAFFAELE DRIVE WALTHAM, MA 02452 USA

9. Additional matters:

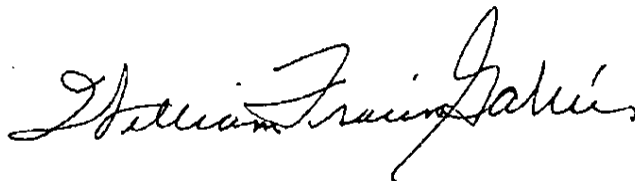
SIGNED UNDER THE PENALTIES OF PERJURY, this 16 Day of December, 2021,
RILEY PARK

(The certificate must be signed by the person forming the LLC.)

THE COMMONWEALTH OF MASSACHUSETTS

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

December 16, 2021 03:11 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



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

mass.gov/dor

Letter ID: L0513637056
Notice Date: January 21, 2022
Case ID: 0-001-413-909



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



UMA FLOWERS LUNENBURG LLC
2 TARBELL ST
PEPPERELL MA 01463-1761

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, UMA FLOWERS LUNENBURG 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



William Francis Galvin
Secretary of the
Commonwealth

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

January 20, 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

UMA FLOWERS LUNENBURG LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **December 16, 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: **PRIYANKA PATEL**

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



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

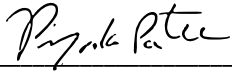
on the date first above written.

William Francis Galvin

Secretary of the Commonwealth

Unemployment Assistance Certification Form

Signed under the pains and penalties of perjury, I, Priyanka Patel, certify that Uma Flowers Lunenburg LLC cannot register with the Department of Unemployment Assistance until after hiring employees.



Signature of Uma Flowers LLC manager

01/25/2022

Date

**OPERATING AGREEMENT
FOR
UMA FLOWERS LUNENBURG LLC, A MASSACHUSETTS
LIMITED LIABILITY COMPANY**

This Operating Agreement (this “Agreement”) of Uma Flowers Lunenburg LLC, a Massachusetts limited liability company (the “Company”), effective as of January 26, 2022 (the “Effective Date”), is entered into by the Company and its Members set forth on the signature page hereto (each a “Member” and collectively, the “Members”).

WHEREAS, the Company was formed as a limited liability company on December 16, 2021 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, as may be amended from time to time (the “Act”); and

WHEREAS, the Members are applying for and intend to operate a Marijuana Establishment in the Town of Lunenburg, Massachusetts; and

WHEREAS, the Members agree that the Membership in and management of the Company shall be governed by the terms set forth herein.

NOW, THEREFORE, the Members and the Company agree as follows:

Section 1 Name. The name of the Company is and shall be Uma Flowers Lunenburg LLC.

Section 2 Purpose. The purpose of the Company is to engage in any lawful act or activity for which limited liability companies may be formed under the Act and to engage in any and all necessary or incidental activities, including but not limited to applying for and operating Marijuana Establishments as may be allowed by the laws of the Commonwealth of Massachusetts and the Town of Lunenburg, Massachusetts.

Section 3 Principal Office and Registered Agent for Service of Process.

(a) Principal Office. The location of the principal office of the Company shall be located at such place as may from time to time be determined by the Members.

(b) Registered Agent and Office. The registered agent of the Company for service of process in the Commonwealth of Massachusetts and the registered office of the Company in the Commonwealth of Massachusetts shall be that person and location reflected in the Articles of Organization. The Company may change the registered agent and or office at any time by filing a statement with the Secretary of Commonwealth of Massachusetts, in the manner provided by law.

Section 4 Members.

(a) Members. The Members own the membership interest (the “Units”) and percentage of interests in the Company as set forth in Schedule A.

(b) Additional Members. One or more additional Members may be admitted to the Company with the consent of the Members pursuant to Section 5. Prior to the admission of any such additional Members to the Company, the Members shall amend this Agreement and Schedule A to make such changes as the Members shall determine to reflect the fact that the Company shall have such additional Members. Each additional Members shall execute and deliver a supplement or counterpart to this Agreement, as necessary.

(c) Certificates. The Company will not issue any certificates to evidence ownership of the Membership interests.

Section 5 Management.

(a) Authority; Powers and Duties of the Members. Subject to the limitations set forth herein, the business and affairs of the Company shall be managed, operated and controlled by or under the direction of the Managing Member. Pursuant to Section 5(b) and (c), the Managing Member shall have the full and complete power, authority and discretion for, on behalf of and in the name of the Company, to take such actions as they may in their discretion deem necessary or advisable to carry out any and all of the objectives and purposes of the Company, subject only to the terms of this Agreement.

(b) Approval of Actions; Ability to Bind. Subject to Section 5(c), the approval of the Managing Member, unless otherwise required by the Act, or the Articles shall be required for all decisions.

(c) Members at the Time of Entering this Operating Agreement. Currently there are two Members, yet all decisions of the Company (except as set forth in Section 8) shall be made by the majority unit holder, Priyanka Patel, the Managing Member.

Section 6 Meetings and Voting.

(a) Calling the Meeting. Meetings of Members shall be held from time to time as may be necessary or appropriate. Meetings of the Members may be called at any time by Majority Vote. The Members may hold meetings at the Company's principal office or at such other place as the Members(s) calling the meeting may designate in the notice for such meeting, including telephonically or virtually.

(b) Notice. Written notice stating the place, date and time of the meeting and, in the case of a meeting of the Members not regularly scheduled, describing the purposes for which the meeting is called, shall be delivered not fewer than five (5) days and not more than thirty (30) days before the date of the meeting to each Member, by or at the direction of the Members calling the meeting, as the case may be. Notice may be waived, in writing, before, at or after any meeting. Attendance of a Members at any meeting without protesting the lack of notice thereof, prior to the end of such meeting, shall be deemed a waiver of notice by such Members.

(c) Quorum. A quorum of any meeting of the Members shall require the presence of the majority of Members. A Quorum is not necessary for the Company to take any action, except as set forth in Section 8, as Priyanka Patel is the Managing Member and may unilaterally take any such action on behalf of the Company.

(d) Participation. Any Members may participate in a meeting of the Members by means

of conference telephone or other communications equipment by means of which all Persons participating in the meeting can hear each other, and participation in a meeting by such means shall constitute presence in person at such meeting.

(e) Conduct of Business. The business to be conducted at such meeting need not be limited to the purpose described in the applicable notice and can include business to be conducted by Members; *provided, however*, that the Members shall have been notified of the meeting in accordance with Section 6(b).

(f) Action Without Meeting. Except as set forth in Section 8, Priyanka Patel may take any action to bind the Company, with or without a meeting, as she is the Managing Member.

Section 7 Liability of Members; Indemnification.

(a) Liability of Members. Except as otherwise required in the Act, the debts, obligations and liabilities of the Company, whether arising in contract, tort or otherwise, shall be solely the debts, obligations and liabilities of the Company, and the Members shall not be obligated personally for any such debt, obligation or liability of the Company solely by reason of being the Members or participating in the management of the Company.

(b) Indemnification. To the fullest extent permitted under the Act, each of the Members (irrespective of the capacity in which it acts) shall each be entitled to indemnification and advancement of expenses from the Company for and against any loss, damage, claimor expense (including attorneys' fees) whatsoever incurred by such Members relating to or arising out of any act or omission or alleged acts or omissions (whether or not constituting negligence or gross negligence) performed or omitted by such Members on behalf of the Company; *provided, however*, that any indemnity under this Section 7(b) shall be provided out of and to the extent of Company assets or insurance purchased by the Company, only, and neither the Members nor any other person shall have any personal liability on account thereof.

Section 8 Transfers

(a) Unless otherwise provided for in the Act or set forth in Section 8(b), no Member may transfer Units without the prior written unanimous consent of the Members.

(b) Permitted Transfers. The provisions of Section 8(a) shall not apply to a transfer by any Members of any of its Units with respect to any Member's transfer, to: (i) such Members' spouse, parent, siblings, descendants (including adoptive relationships and stepchildren) and the spouses of each such natural persons (collectively, "Family Members"); (ii) a trust under which the distribution of Units may be made only to such Members and/or any Family Members of such Members; (iii) a charitable remainder trust, the income from which will be paid to such Members during his life; (iv) a corporation, partnership or limited liability company, the stockholders, partners or Members of which are only such Members and/or Family Members of such Members; or (v) by will or by the laws of intestate succession, to such Members' executors, administrators, testamentary trustees, legatees or beneficiaries; *provided, however*, that any Member who Transfers Units shall remain bound by the provisions of Section 13(a). Any transfer must be approved by the Cannabis Control Commission if such transfer is governed by the Regulations for the cannabis industry in Massachusetts, particularly 935 CMR 500.000, and if that transfer is of 10% or more of the Company.

Section 9 Term. The term of the Company shall be perpetual unless the Company is dissolved and terminated in accordance with Section 13.

Section 10 Tax Status.

(a) Tax Status. It is the intention of the Company and the Members, that the Company be treated as a disregarded entity for federal and all relevant state tax purposes and neither the Company nor the Members shall take any action or make any election which is inconsistent with such tax treatment. All provisions of this Agreement are to be construed so as to preserve the Company's tax status as a disregarded entity.

(b) Income and Deduction. All items of income, gain, loss, deduction and credit of the Company (including, without limitation, items not subject to federal or state income tax) shall be treated for federal and all relevant state income tax purposes as items of income, gain, loss, deduction and credit of the Members.

Section 11 Distributions. Distributions shall be made to the Members pursuant to the Distribution Agreement.

Section 12 Dissolution; Liquidation.

(a) The Company shall dissolve, and its affairs shall be wound up upon the first occurrence of the following: (i) the unanimous written consent of the Members; or (ii) any other event or circumstance giving rise to the dissolution of the Company under the Act, unless the Company's existence is continued pursuant to the Act.

(b) Upon dissolution of the Company, the Company shall immediately commence to wind up its affairs and the Members shall promptly liquidate the business of the Company. During the period of the winding up of the affairs of the Company, the rights and obligations of the Members under this Agreement shall continue.

(c) In the event of dissolution, the Company shall conduct only such activities as are necessary to wind up its affairs (including the sale of the assets of the Company in an orderly manner), and the assets of the Company shall be applied first, to creditors, to the extent otherwise permitted by law, in satisfaction of the liabilities of the Company (whether by payment or the making of reasonable provision for payment thereof); and

(d) Upon the completion of the winding up of the Company, the Members shall file Articles of Dissolution in accordance with the Act.

(e) The Members agree that products containing cannabis and the license(s) for the operation of Marijuana Establishments in Massachusetts that may be held by the Company shall not be available to wind up the debts and outstanding obligations of the Company without prior approval of the Cannabis Control Commission.

Section 13 Miscellaneous.

(a) Confidentiality. To the extent permitted by law and the obligations of the Members to apply for and operate licenses for Marijuana Establishments in the Commonwealth of Massachusetts, each Member shall keep the terms, condition, obligations, and existence of this Agreement confidential.

(b) Amendments. Amendments to this Agreement may be made only with the unanimous written consent of the Members.

(c) Governing Law. This Agreement shall be governed by the laws of the Commonwealth of Massachusetts.

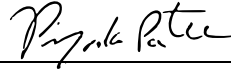
(d) Severability. In the event that any provision of this Agreement is declared invalid, illegal or unenforceable, such provision shall survive to the extent it is not so declared, and the validity, legality, and enforceability of the other provisions hereof shall not in any way be affected or impaired thereby, unless such action would substantially impair the benefits to any party of the remaining provisions of this Agreement.

[Signature Page Follows]

IN WITNESS WHEREOF, the undersigned have executed this Agreement to be effective as of the date first written above.

COMPANY:

Uma Flowers Lunenburg LLC, a Massachusetts Limited Liability Company

A handwritten signature in cursive script, appearing to read "Priyanka Patel", is written above a horizontal line.

Priyanka Patel, Managing Member

Schedule A

MEMBERS SCHEDULE

Members Name and Address	CommonUnits	Percentage Interest
Priyanka Patel 700 Greendale Ave., Unit 11106 Needham, MA 02492	9,100	91%
Tejal Patel 109 Raffaele Dr. Waltham, MA 02452	900	9%
Total:	10,000	100%



PLATINUM
INSURANCE AGENCY

418 Mass Ave, Arlington, MA 02474 / Ph:(781)859-5356 / Fax:(781)583-5012 / www.platinuminsuranceagency.com

January 25, 2022

Uma Flowers Lunenburg LLC

45 Summer St

Lunenburg, MA 01462

To Whom It May Concern:

This letter is to confirm that Platinum Insurance Agency Inc. is able to procure the proper liability insurance requirements per the Massachusetts Cannabis Control Commission's 935 CMR 500.105(10) requirements referenced below for the above named applicant.

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

If you have any further questions, please call our offices at 781-859-5356

Sincerely,

Niru Yadav

President

Platinum Insurance Agency Inc.



UMA FLOWERS LUNENBURG LLC

BUSINESS PLAN

May 23, 2022

EXECUTIVE SUMMARY

Mission Statement and Message from the CEO

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

Uma Flowers is owned by two women from Massachusetts with ties to the local community and a history of commitment to non-profits and healthcare. Uma Flowers’ team has many years of retail experience, handling of controlled substances, and analyzing and improving community health. Uma Flowers has established an adult-use Cannabis dispensary in Pepperell, MA. Uma Flowers seeks to establish an exemplary management team with the goal of operating a premier family-owned, small-business, retail Marijuana Establishment in the town and overall state.

License Types

Uma Flowers is applying for the following Licenses from the Massachusetts Cannabis Control Commission (the “Commission”) to operate Marijuana Establishments in Massachusetts:

- Marijuana Retailer at 43 Summer Street Lunenburg, MA 01462
- If and when Uma Flowers Lunenburg LLC becomes vertically integrated and able to apply as Marijuana Treatment Center we will do so. We do not expect our financial projections to be impacted given that revenue from adult use market exceeds the medical market. The additional cost shall be borne by the adult use application.

What Drives Us

Uma Flowers’ goals include:

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

TEAM

General

Uma Flowers has put together a team to implement the operations of the Marijuana Establishment and intends to create 10-12 full-time staff positions within the first three years of

operation. Uma Flowers has assembled a team of professionals with a diverse set of talents to operate an Adult Use Marijuana Dispensary. The team includes a number of consultants including security, legal and industry experts in addition to the leadership team. The team's combined experience includes retail, patient health, public health and pain management. The leadership team is committed to operating a highly professional dispensary. No Person or Entity Having Direct or Indirect Control over Uma Flowers team is or will be a controlling person with over more than three licenses in a particular class of license.

Founder

Priyanka Patel, PharmD, Founder, Chief Executive Officer, Chief Compliance Officer

- Owner/operator of Uma Flowers Cannabis Dispensary in Pepperell, MA.
- Pharmacist in retail setting for over 10 years. Experience with Handling, Managing and Dispensing Controlled substances. Experienced in providing education/consultation in controlled substances along with being compliant with federal and state laws.
- Small business owner/operator in New England area for over 10 years.
 - Founder and Chief Executive Officer is responsible for creating and upholding the core values and vision of Uma Flowers. Additionally, she is responsible for setting long-term goals for the company and guiding the company strategically to accomplish those goals. Lastly, she is responsible for implementing standard operation procedures for retail sales.
 - Chief compliance officer is responsible for ensuring the company is complying with applicable laws and regulations. Also responsible for ensuring those employees are following standard operating procedures and company policies.

Additional Staff

Head of Security

- Responsible for the development and overall management of the Security Policies and Procedures, implementing, administering, and revising the policies as needed. Additionally, responsible for maintaining all security related records, incident reports and other reports written by security agents. Also, to maintain frequent contact with the Pepperell Police and Fire Department.

Store Manager

- Responsible for day-to-day operations, hiring, overseeing, and scheduling employees.

Reception

- Responsible for checking customer's ID cards and escorting them to the retail area for purchasing products

Salesclerk/Cashier

- Responsible for greeting customers, taking and fulfilling orders, and answering any product related questions. Additionally, responsible for great customer service and ensuring customers have a pleasant experience.

COMPANY DESCRIPTION

Structure

Uma Flowers is a Massachusetts domestic for-profit limited liability company that is applying for Licenses from the Commission to operate Marijuana Establishments in the Commonwealth.

Uma Flowers will file, in a form and manner specified by the Commission.

Operations

Uma Flowers will establish inventory controls and procedures for the conduct of inventory reviews and comprehensive inventories of marijuana products and finished, stored marijuana; conduct a monthly inventory of finished, stored marijuana; conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and promptly transcribe inventories if taken by use of an oral recording device.

Uma Flowers will tag and track all marijuana seeds, clones, plants, and marijuana products using Metrc and in a form and manner approved by the Commission.

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

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

Uma Flowers will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy will be no higher than \$5,000 per occurrence. If adequate coverage is unavailable at a reasonable rate, Uma Flowers will place in escrow at least \$250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. Uma Flowers will keep reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

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

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

Uma Flowers will demonstrate consideration of the factors for Energy Efficiency and Conservation outlined in 935 CMR 500.105(15) as part of its operating plan and application for licensure.

Prior to commencing operations, Uma Flowers will provide proof of having obtained a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation Fund. The bond will ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000 or the cessation of operation of Uma Flowers. If Uma Flowers is unable to secure a surety bond, it will place in escrow a sum of no less than \$5,000 or such other amount approved by the Commission, to be expended for coverage of liabilities. The escrow account will be replenished within ten business days of any expenditure required under 935 CMR 500.105: *General Operational Requirements for Marijuana Establishments* unless Uma Flowers has ceased operations. Documentation of the replenishment will be promptly sent to the Commission.

Uma Flowers and Uma Flowers agents will comply with all local rules, regulations, ordinances, and bylaws.

Security

Uma Flowers will contract with a professional security and alarm company to design, implement, and monitor a comprehensive security plan to ensure that the facility is a safe and secure environment for employees and the local community.

Uma Flowers' state-of-the-art security system will consist of perimeter windows, as well as duress, panic, and holdup alarms connected to local law enforcement for efficient notification and response in the event of a security threat. The system will also include a failure notification system that will immediately alert the executive management team if a system failure occurs. A redundant alarm system will be installed to ensure that active alarms remain operational if the primary system is compromised.

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

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

agents and visitors will be required to visibly display an ID badge, and Uma Flowers will maintain a current list of individuals with access. Uma Flowers will have security personnel on-site during business hours.

On-site consumption of marijuana by Uma Flowers' employees and visitors will be prohibited.

Benefits to Host Communities

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

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

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

MARKET RESEARCH

Customers

Uma Flowers will only sell marijuana and marijuana products to customers ages 21 years and older that provide valid identification.

Competitors

Uma Flowers' has several competitors from the neighboring towns however none from within Lunenburg. While there have been over 437 retailer applications submitted to the Commission for Massachusetts there are only 79 applications submitted in Worcester county where Uma Flowers plans to locate. Currently, there are only 44 operating retail establishments in Worcester county.

Competitive Advantage

Uma Flowers' competitive advantages over their competition include being owned by two minority women from Massachusetts with ties to the local community and a history of commitment to non-profits and healthcare. Other than owning/operating a dispensary in Pepperell, MA the professional background of both co-founders, a Pharmacist and a master's in public health, make them a unique duo that sets them apart from the average marijuana establishment owners and operators. Uma Flowers' team has many years of retail experience, handling of controlled substance, and analyzing and improving community health. Unlike many of Uma Flowers' competitors, Uma Flowers is family owned and funded. The team is from and lives in Massachusetts and plans to play a hands-on role in working with the town and in the dispensary to assure the dispensary has a positive impact on the community. Uma Flowers seeks to establish an exemplary management team with the goal of operating a premier family-owned, small-business, retail Marijuana Establishment in the town and overall state.

Uma Flowers possesses several strengths that separate Uma Flowers from the competition. Co-founder, Priyanka Patel, not only has experience as a retail pharmacist, but has been involved with owning and operating several family businesses. Priyanka's experience with working in a pharmacy and in family businesses will help her own and operate a retail marijuana establishment. The second Co-founder, Tejal Patel, has worked in the public health space and has experience with working with people in the community to improve health care. This experience has helped with developing a retail marijuana establishment in Pepperell that meets consumer's needs. The industry is rapidly growing, and customers are scrutinizing the quality of cannabis dispensed, the services offered, the location of the dispensary, the prices offered for the products, and the branding of the business.

Regulations

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

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

Products & Services

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

1. Concentrates
2. Topical Salves
3. Creams and Lotions

4. Patches
5. Oral Mucosal and Sublingual Dissolving Tablets
6. Tinctures
7. Sprays
8. Inhalation Ready to Use CO2 Extracted Hash Oils
9. Pre-Dosed Oil Vaporizers
10. Ingestion Capsules
11. Infused Food and Beverages

Pricing Structure

Uma Flowers' pricing structure will vary based on market conditions. Uma Flowers plans to provide products of superior quality and will price accordingly.

MARKETING & SALES

Growth Strategy

Uma Flowers' plan to grow the company includes:

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

Uma Flowers plans to seek additional, appropriate locations in the surrounding area to expand business and reach an increased number of customers in the future.

Communication

Uma Flowers will engage in reasonable marketing, advertising, and branding practices that do not jeopardize the public health, welfare, or safety of the general public, or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising, and branding created for viewing by the public will include the statement: "Please Consume Responsibly," in a conspicuous manner on the face of the advertisement and will include a minimum of two of the warnings, located at 935 CMR 500.105(4)(a), in their entirety in a conspicuous manner on the face of the advertisement.

All marketing, advertising, and branding produced by or on behalf of Uma Flowers will include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½)(xxvi): "This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two

hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA.”

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

Uma Flowers will communicate with customers through:

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

Uma Flowers will provide a catalogue and a printed list of the prices and strains of marijuana available to consumers and will post the same catalogue and list on its website and in the retail store.

Sales

Uma Flowers will sell its products and services by engaging customers with knowledgeable personnel and engaging customers from social media marketing. Staff will be trained on products and how to properly educate customers on products at the marijuana establishment.

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

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

Logo

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

The logo is discreet, unassuming, and does not use marijuana symbols, images of marijuana, related paraphernalia, or colloquial references to cannabis or marijuana.

An image of the logo can be found below:



FINANCIAL PROJECTIONS

Lunenburg Dispensary

	Year 1	Year 2	Year 3
Avg Daily Customers	91	100	105
Avg Hourly Customers	9	11	12
Annual Customers	32,801	36,081	37,885
Total Sales	\$ 3,280,114.29	\$ 3,608,125.71	\$ 3,788,532.00
Annual Growth		10%	5%
Taxes & Fees			
State Sales, Excise, Local City Tax (20%)	\$ 546,685.71	\$ 601,354.29	\$ 631,422.00
Total Sales After Taxes	\$ 2,733,428.57	\$ 3,006,771.43	\$ 3,157,110.00
Total Sales After Taxes	\$ 2,733,428.57	\$ 3,006,771.43	\$ 3,157,110.00
COGS 40%	\$ 1,093,371.43	\$ 1,202,708.57	\$ 1,262,844.00
Gross Profit	\$ 1,640,057.14	\$ 1,804,062.86	\$ 1,894,266.00
Expenses			
Recurring Expenses	\$348,430	\$348,430	\$348,430
Labor Costs	\$338,580	\$338,580	\$338,580
Capital Expendures	\$188,500	\$5,000	\$5,000
Total	\$875,510	\$692,010	\$692,010
Gross Profit	\$ 1,640,057.14	\$ 1,804,062.86	\$ 1,894,266.00
Total Expenses	\$875,510	\$692,010	\$692,010
Fed Tax 40%	\$ 656,022.86	\$ 721,625.14	\$ 757,706.40
Host Agreement Fee (3%)	\$ 82,002.86	\$ 90,203.14	\$ 94,713.30
Net Operating Income	\$ 26,521.43	\$ 300,224.57	\$ 349,836.30

FINAL REMARKS

Uma Flowers has the experience and know-how to safely and efficiently provide high quality, consistent, laboratory-tested cannabis and derivatives. Uma Flowers hopes to bring its high-quality standards to adult-use consumers to provide them with a safe and clean community

environment. Uma Flowers' security systems and comprehensive security measures will also help ensure a safe and secure environment that will help deter and prevent diversion.

In Massachusetts adult-use sales eclipsed \$1.1 billion in the first 11 months of 2021, and as more Marijuana Establishments become operational, the sales growth rate continues to expand month after month. Uma Flowers is prepared to position itself well in this market and contribute to this growth through a highly experienced team of successful operators working under an established framework of high quality standard operating procedures and growth strategies. In doing so, Uma Flowers looks forward to working cooperatively with all the municipalities in which it is operating to help spread the benefits that this market will yield.

PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

Pursuant to 935 CMR 500.050(8)(b), Uma Flowers Lunenburg LLC (“Uma Flowers”) will only be accessible to individuals, visitors, and agents who are 21 years of age or older with a verified and valid government-issued photo ID. Upon entry into the premises of the marijuana establishment by an individual, visitor, or agent, a Uma Flowers agent will immediately inspect the person’s proof of identification and determine the person’s age, in accordance with 935 CMR 500.140(2).

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

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

QUALITY CONTROL AND TESTING

Quality Control

Uma Flowers Lunenburg LLC (“Uma Flowers”) will comply with the following sanitary requirements:

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

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

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

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

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

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

Testing

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

Any Independent Testing Laboratory relied upon by Uma Flowers for testing will be licensed or registered by the Commission and (i) currently and validly licensed under 935 CMR 500.101:

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

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

Uma Flowers' marijuana will be tested for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides. Uma Flowers acknowledges and understands that the Commission may require additional testing.

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

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

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of Uma Flowers' marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to Uma Flowers for

disposal or by the Independent Testing Laboratory disposing of it directly. All Single-servings of marijuana products will be tested for potency in accordance with 935 CMR 500.150(4)(a) and subject to a potency variance of no greater than plus/minus ten percent (+/- 10%). Any marijuana or marijuana products submitted for retesting prior to remediation will be submitted to an Independent Testing Laboratory other than the laboratory which provided the initial failed result. Marijuana submitted for retesting after documented remediation may be submitted to the same Independent Testing Laboratory that produced the initial failed testing result prior to remediation.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Overview

Uma Flowers Lunenburg LLC (“Uma Flowers”) will securely maintain personnel records, including registration status and background check records. Uma Flowers will keep, at a minimum, the following personnel records:

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

Agent Personnel Records

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

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

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

After-Hours Contact Information

Priyanka Patel, Co-Founder, Co-Chief Executive Officer, Chief Compliance Officer
617-784-4046

Tejal Patel, Co-Founder, Co-Chief Executive Officer, Director of Diversity & Inclusion
240-472-5419

Business Hours (Subject to Approval by the Special Permit Granting Authority)

Monday: 10AM – 9PM

Tuesday: 10AM – 9PM

Wednesday: 10AM – 9PM
Thursday: 10AM – 9PM
Friday: 10AM – 10PM
Saturday: 10AM – 10PM
Sunday: 10AM – 6PM

Agent Background Checks

- In addition to completing the Commission's agent registration process, all agents hired to work for Uma Flowers will undergo a detailed background investigation prior to being granted access to a Uma Flowers facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for Uma Flowers pursuant to 935 CMR 500.030 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.
- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.030, Uma Flowers will consider:
 - a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.
 - b. All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability.
 - c. Where applicable, all look-back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.
- Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, Uma Flowers will:
 - a. Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination.
 - b. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, Uma Flowers will consider the following factors:
 - i. Time since the offense or incident;
 - ii. Age of the subject at the time of the offense or incident;
 - iii. Nature and specific circumstances of the offense or incident;
 - iv. Sentence imposed and length, if any, of incarceration, if criminal;
 - v. Penalty or discipline imposed, including damages awarded, if civil or administrative;
 - vi. Relationship of offense or incident to nature of work to be performed;
 - vii. Number of offenses or incidents;
 - viii. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;

- ix. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and
 - x. Any other relevant information, including information submitted by the subject.
- c. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS.
- All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.
 - Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.
 - References provided by the agent will be verified at the time of hire.
 - As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by Uma Flowers or the Commission.

Personnel Policies and Training

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

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

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

RECORDKEEPING PROCEDURES

General Overview

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

Recordkeeping

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

- **Corporate Records**

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

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

- **Business Records**

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

- Assets and liabilities;
- Monetary transactions;

- Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products;
- Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Uma Flowers.
- Personnel Records

At a minimum, Personnel Records will include:

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

development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.

- Sales Records for Marijuana Retailer

- Uma Flowers will maintain records that it has performed 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 the sales data and produce such records on request to the Commission.

- Incident Reporting Records

- Within ten (10) calendar days, Uma Flowers will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident.
- All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by Uma Flowers for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within Uma Flowers' jurisdiction on request.

- Visitor Records

- A visitor sign-in and sign-out log will be maintained at the security office. The log will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.

- Waste Disposal Records

- When marijuana or marijuana products are disposed of, Uma Flowers will create and maintain an electronic record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Uma Flowers agents present during the disposal or other handling, with their signatures. Uma Flowers will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

- Security Records

- A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
- Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.
- Recordings shall not be destroyed or altered and shall be retained as long as necessary if Uma Flowers is aware of pending criminal, civil or administrative

investigation or legal proceeding for which the recording may contain relevant information.

- Transportation Records
 - Uma Flowers will retain all transportation manifests for a minimum of one (1) year and make them available to the Commission upon request.
- Vehicle Records (as applicable)
 - Records that any and all of Uma Flowers' vehicles are properly registered, inspected, and insured in the Commonwealth and shall be made available to the Commission on request.
- Agent Training Records
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).
- Responsible Vendor Training
 - Uma Flowers shall maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.
- Closure
 - In the event Uma Flowers closes, all records will be kept for at least two (2) years at Uma Flowers' expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, Uma Flowers will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.
- Written Operating Policies and Procedures

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

 - Security measures in compliance with 935 CMR 500.110;
 - Employee security policies, including personal safety and crime prevention techniques;
 - A description of Uma Flowers' hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
 - Storage of marijuana in compliance with 935 CMR 500.105(11);
 - Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
 - Price list for Marijuana and Marijuana Products, and alternate price lists for patients with documented Verified Financial Hardship as defined in 501.002: *Definitions*, as required by 935 CMR 501.100(1)(f);
 - Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
 - Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;

- A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- Alcohol, smoke, and drug-free workplace policies;
- A plan describing how confidential information will be maintained;
- Policy for the immediate dismissal of any dispensary agent who has:
 - Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission;
 - Engaged in unsafe practices with regard to Uma Flowers operations, which will be reported to the Commission; or
 - Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
- A list of all board of directors, members, and executives of Uma Flowers, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on Uma Flowers' website.
- Policies and procedures for the handling of cash on Uma Flowers premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- Policies and procedures for energy efficiency and conservation that will include:
 - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
 - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
 - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.
- License Renewal Records
 - Uma Flowers shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the

records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Record-Retention

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

MAINTAINING OF FINANCIAL RECORDS

Uma Flowers Lunenburg LLC's ("Uma Flowers") operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission's Adult Use of Marijuana regulations (935 CMR 500). Financial records maintenance measures include policies and procedures requiring that:

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

- Additional written business records will be kept, including, but not limited to, records of:
 - Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
 - Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
 - Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission's regulations.
- License Renewal Records

Uma Flowers shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

QUALIFICATIONS AND TRAINING

Uma Flowers Lunenburg LLC (“Uma Flowers”) will ensure that all employees hired to work at a Uma Flowers facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

Qualifications

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

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

Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of Uma Flowers’ agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent’s job function. Agent training will at least include the Responsible Vendor Training Program and eight (8) hours of on-going training annually.

All of Uma Flowers’ current Owners, managers, and employees that are involved in the handling and sale of marijuana at the time of licensure or renewal of licensure will have attended and successfully completed the mandatory Responsible Vendor Training Program operated by an education provider accredited by the Commission to provide the annual minimum of three (3) hours of required training to marijuana establishment agents to be designated a “Responsible Vendor”. Once Uma Flowers is designated a “Responsible Vendor”, all new employees involved in the handling and sale of marijuana will successfully complete a Responsible Vendor Training Program within 90 days of the date they are hired. After initial successful completion of a Response Vendor Training Program, each Owner, manager, and employee involved in the handling and sale of marijuana will successfully complete the program once every year thereafter to maintain designation as a “Responsible Vendor”.

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

As part of the Responsible Vendor Training Program, Uma Flowers' agents will receive training on a variety of topics relevant to marijuana establishment operations, including but not limited to the following:

1. Marijuana's effect on the human body, including:
 - Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
 - The amount of time to feel impairment;
 - Visible signs of impairment; and
 - Recognizing signs of impairment
2. Diversion prevention and prevention of sales to minors, including best practices;
3. Compliance with all tracking requirements;
4. Acceptable forms of identification, including:
 - How to check identification;
 - Spotting false identification;
 - Patient registration cards formerly and validly issued by the DPH or currently and validly issued by the Commission; and
 - Common mistakes made in verification
5. Other key state laws and rules affecting Owners, managers, and employees, including:
 - Local and state licensing and enforcement;
 - Incident and notification requirements;
 - Administrative and criminal liability;
 - License sanctions;
 - Waste disposal;
 - Health and safety standards;
 - Patrons prohibited from bringing marijuana onto licensed premises;
 - Permitted hours of sale;
 - Conduct of establishment;
 - Permitting inspections by state and local licensing and enforcement authorities;
 - Licensee responsibilities for activities occurring within licensed premises;
 - Maintenance of records;
 - Privacy issues; and
 - Prohibited purchases and practices.

Uma Flowers Lunenburg LLC

Energy Compliance Plan

Uma Flowers Lunenburg LLC (Uma) proposes to establish an adult-use marijuana retail establishment in Lunenburg, MA and does not include cultivation or product manufacturing. Therefore, pursuant to a 935 CMR 500.103(1)(b) the additional requirement of an energy compliance letter is not required.

Uma has put together a plan for environmental sustainability in sourcing of retail products.

The Commission has a regulatory structure in place to give a leadership rating to cannabis cultivators and product manufacturers pursuant to 935 CMR 500.040(1)(c), for their environmental sustainability. Uma will seek wholesale providers who have been awarded that rating. Until that time, Uma will seek out wholesalers who can demonstrate the following:

- a. that they have met or exceeded energy and environmental impact goals as may be set forth in the Commission's Regulations;
- b. consistently documented and complied with known industry best management practices for energy use, waste disposal and environmental impact;
- c. retired renewable energy credits representing 100% of their energy usage; or
- d. accurately labeled all their products as being produced using 100% renewable energy.

Uma shall include these as a factor in choosing wholesale providers in addition to cost and quality of the product. Uma shall maintain a record of these factors in sourcing its products and produce such a record to Commission or Pepperell officials upon request.

Uma shall comply with rules imposed by the Commonwealth of Massachusetts Executive Office of Energy and Environmental Affairs (EOEEA), regulations from the Commission related to cannabis, building codes, and local rules as may be set forth by the Planning Board or in other municipal code sections. Specifically, and at a minimum Uma shall consider the following measures in conducting its retail operation:

- a. Recycle all non-cannabis waste capable of being recycled with clearly marked recycle bins throughout the facility;
- b. Source non-cannabis materials from local suppliers and whenever possible and seek products that:
 - i. Are manufactured in a sustainable fashion;
 - ii. Do not contain toxic materials or ozone-depleting substances;
 - iii. Can be recycled and/or are produced from recycled/renewable materials;
 - iv. Do not make use of excessive packaging; and
 - v. Are designed to be repairable and not throwaway
- c. Use led lighting wherever possible inside and outside of the facility;

- d. Construct the facility with environmentally sustainable materials as may be recommended by construction professionals including engaging a lead-certified contractor;
 - e. Attempt to recycle used lumber or other materials during demolition;
 - f. Install solar panels should they be recommended by an engineer as having merit;
 - g. Provide employees with public transportation stipends of \$95.00/month in addition to their salaries;
 - h. Create and maintain a carpool and ridesharing message board so that employees may carpool if possible;
 - i. Install bicycle racks outside of the facility for employees and customers to park their bicycles if possible;
 - j. Purchase and outfit with required security, a hybrid, electric, or other high efficiency vehicle should Uma pick up products from wholesalers or deliver to customers;
 - k. Use air-hand dryers in the washrooms instead of paper towels;
 - l. Installing low-flow toilets and faucet aerators in washrooms;
 - m. Use drought-tolerant landscape design, with drip irrigation and rain sensors on any exterior landscaping;
 - n. Investigate and take advantage of rebate and incentive programs that may be available for upgrading insulation and appliances;
 - o. Discourage employees from using plastic, single-use containers, stock the kitchen with cups and dishes, and encourage employees to bring their own; and
 - p. Create an internal environmental working group to monitor Uma's environmental sustainability and make recommendations for the operation of Uma's business.
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DIVERSITY PLAN

Statement of Purpose/Overview

Uma Flowers Lunenburg LLC (“Uma Flowers”) is dedicated to building and maintaining a diverse and inclusive workforce. Building a team of individuals with unique experiences, backgrounds, and perspectives allows us to better represent and connect with the community and customers we serve. Unique and different backgrounds will allow each member of the team to learn and expand their associations which builds a strong team.

Uma Flowers is dedicated to promoting equity in its operations for diverse populations, which the Commission has identified as the following:

1. Minorities;
2. Women;
3. Veterans;
4. People with disabilities; and
5. People of all gender identities and sexual orientations.¹

To support such populations, Uma Flowers has created the following Diversity Plan (the “Plan”) and has identified and created goals/programs to promote equity in Uma Flowers’ operations.

Goals

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

1. Recruit a staff comprised of 40% women and 20% minorities, 10% veterans, 10% people with disabilities, and 10% of individuals who are LGBTQ for its hiring initiatives
2. Host two business seminars per year to provide industry related training and leadership to diverse population entrepreneurs which includes minorities, women, veterans, people with disabilities. This business seminar will promote diversity in the workplace because we will meet diverse individuals who attend the seminar and who may show interest in applying to be a part of our staff. The seminar may also encourage diverse individuals to start their own start-up in the cannabis industry which in turn also further diversifies the cannabis industry.

Programs

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

1. Advertise employment opportunities in diverse publications such as 420Careers.com Cannabis.net, WeedHire.com, annually.
2. First Uma Flowers will advertise the business seminars at least 8 weeks in advance of the set date. Uma Flowers will advertise within retail shop by posting signs and handing

¹ As per 935 CMR 500.101(1)(c)(8)(k) as promulgated on 11/1/19 and the Commission’s *Guidance on Required Positive Impact Plans and Diversity Plans* as revised 2/25/19. For purposes of this Diversity Plan, Uma Flowers is interpreting “[p]eople of all gender identities and sexual orientations” to mean people identifying as LGBTQ+.

flyers to customers and on their website. To specifically target diverse populations to ensure they are in attendance at the business seminar, we will have our staff set up a table in the showroom 4 weeks prior to the seminar to approach and talk to our customers but especially our diverse population customers (women, minorities, etc) who seem interested in the industry and encourage them to join the seminar. Uma Flowers will host one business seminar per semester at the establishment or elsewhere within the town. The seminar will include a presentation given by one or both of the founders who are women and minorities. The topics of the seminar will be 1.) Steps to Starting start-ups, particularly a retail cannabis store, 2.) The challenges faced and 3.) Solutions and resources to address the challenges. There will be an opportunity for question and answers for the attendees. There will be a maximum of 10 participants allowed to join one seminar.

Measurements

The Director of Diversity & Inclusion will administer the Plan and will be responsible for developing measurable outcomes to ensure Uma Flowers continues to meet its commitments. Such measurable outcomes, in accordance with Uma Flowers' goals and programs described above, include:

- Number of individuals from the above referenced demographic groups who were hired and retained after opening doors for business
- Number of business seminars held per year. Also, to give a survey at the end of the seminar to understand beneficial and unbeneficial topics of the seminar to improve the seminar for future attendees

Beginning upon receipt of Uma Flowers' first Provisional License from the Commission to operate a marijuana establishment in the Commonwealth, Uma Flowers will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The Director of Diversity & Inclusion will review and evaluate Uma Flowers' measurable outcomes no less than 3 months to ensure that Uma Flowers is meeting its commitments. Uma Flowers is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

Uma Flowers will make every effort to meet these goals in a non-discriminatory manner.

Acknowledgements

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