



Massachusetts Cannabis Control Commission

Marijuana Product Manufacturer

General Information:

License Number: MP282367
Original Issued Date: 04/22/2026
Issued Date: 04/22/2026
Expiration Date: 04/22/2027

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Wachusett Cannabis Inc.

Phone Number: 774-777-0202 Email Address: wachusettcannabis@gmail.com

Business Address 1: 470 Main Street

Business Address 2:

Business City: Clinton

Business State: MA

Business Zip Code: 01510

Mailing Address 1: 470 Main Street

Mailing Address 2:

Mailing City: Clinton

Mailing State: MA

Mailing Zip Code: 01510

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

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

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 20

Percentage Of Control: 100

Role: Executive / Officer

Other Role:

First Name: Jigar

Last Name: Patel

Suffix:

Gender: Male

User Defined Gender:

Date generated: 05/12/2026

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: Jigar

Last Name: Patel

Suffix:

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$30000 Percentage of Initial Capital: 20

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: Jigar

Last Name: Patel

Suffix:

Marijuana Establishment Name: Vedi Naturals LLC

Business Type: Marijuana Retailer

Marijuana Establishment City: Marlborough

Marijuana Establishment State: MA

Individual 2

First Name: Jigar

Last Name: Patel

Suffix:

Marijuana Establishment Name: Wachusett Cannabis, Inc.

Business Type: Marijuana Retailer

Marijuana Establishment City: Clinton

Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 470 Main Street

Establishment Address 2:

Establishment City: Clinton

Establishment Zip Code: 01510

Approximate square footage of the Establishment: 7500

How many abutters does this property have?: 25

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	WCI - Plan to Remain Compliant with Local Zoning.pdf	pdf	684ee44c6cf3645b621375a2	06/15/2025
Community Outreach Meeting Documentation	(Reduced) WCI - COM - Certified Abutter Receipts_Redacted.pdf	pdf	684ee4626cf3645b621375b9	06/15/2025
Community Outreach Meeting Documentation	25_04_06 - WCI - COM Affidavit of Publication_Redacted.pdf	pdf	684ee46a6cf3645b621375cd	06/15/2025

Community Outreach Meeting Documentation	WCI - COM - Adportal Self Service Advertising Confirmation_Redacted.pdf	pdf	684ee48c6cf3645b621375e4	06/15/2025
Community Outreach Meeting Documentation	25_03_05 - WCI - COM Notice - Town Clerk Town Admin.pdf	pdf	684ee4c56cf3645b621375fe	06/15/2025
Community Outreach Meeting Documentation	WCI - COM Attestation.pdf	pdf	684ee4f92309ac25e36a6494	06/15/2025
Executed HCA	4758_001.pdf	pdf	689ddbe697444ac6c4bdd4d5	08/14/2025
Executed HCA	25_09_23 - WCI - 1st Amendment to HCA(executed).pdf	pdf	68d5403c5c55e822b031be80	09/25/2025

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.: \$

POSITIVE IMPACT PLAN

Positive Impact Plan:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	25_09_11 - Wachusett Cannabis PIP (updated).pdf	pdf	68c355486248b2e3247f43f2	09/11/2025

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Executive / Officer	Other Role:
First Name: Jigar	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
Bylaws	By-Laws - Wachusett 9.13.24 (1).pdf	pdf	684814786cf3645b620f0290	06/10/2025
Articles of Organization	WCI - Articles of Org.pdf	pdf	6848147a2309ac25e365d912	06/10/2025
Department of Unemployment Assistance - Certificate of Good standing	25_09_10 - WCI - COC DUA.pdf	pdf	68c21a4c566b140b4e067e58	09/10/2025
Department of Revenue - Certificate of Good standing	25_09_10 - WCI - DOR COGs.pdf	pdf	68c2ca13566b140b4e06b157	09/11/2025
Secretary of Commonwealth - Certificate of Good Standing	25_09_11 - WCI - SOS COG.pdf	pdf	68c2e5fa566b140b4e06f355	09/11/2025

No documents uploaded

Massachusetts Business Identification Number: 001837372

Doing-Business-As Name: kosa

DBA Registration City: Clinton

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	WCI - Business Plan.pdf	pdf	684815166cf3645b620f02e6	06/10/2025
Plan for Liability Insurance	WCI - Plan for Obtaining Liability Insurance.pdf	pdf	684815276cf3645b620f030e	06/10/2025
Capitalization Table	Screenshot 2025-06-10 072200.png	png	684815712309ac25e365d991	06/10/2025
Operating Agreement or Articles of Incorporation	WCI - Articles of Org.pdf	pdf	684816412309ac25e365da24	06/10/2025
Proposed Timeline	WCI - Proposed Timeline (updated).pdf	pdf	68defc325c55e822b03af0ac	10/02/2025

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Types of products Manufactured.	WCI -PM- Types of Products Manufactured.pdf	pdf	689dd7b897444ac6c4bdcac5	08/14/2025
Method used to produce products	WCI -PM- Methods Used to Produce Products.pdf	pdf	689dd7c097444ac6c4bdcae3	08/14/2025
Sample of unique identifying marks used for branding	WCI -PM- Samples of Unique Identifying Marks Used for Branding.pdf	pdf	689dd7c797444ac6c4bdcaf7	08/14/2025
Restricting Access to age 21 and older	WCI - Plan for Restricting Access to Age 21 and Older.pdf	pdf	689dd7f297444ac6c4bdcb43	08/14/2025
Security plan	WCI - Security Plan.pdf	pdf	689dd7ff97444ac6c4bdcb57	08/14/2025
Prevention of diversion	WCI - Prevention of Diversion.pdf	pdf	689dd8111eca271ddda2622a	08/14/2025
Storage of marijuana	WCI - Storage of Marijuana.pdf	pdf	689dd8171eca271ddda26241	08/14/2025
Transportation of marijuana	WCI -PM-Transportation of Marijuana.pdf	pdf	689dd83f1eca271ddda2629a	08/14/2025
Inventory procedures	WCI - Inventory Procedures.pdf	pdf	689dd84d1eca271ddda262ae	08/14/2025
Quality control and testing	WCI - Quality Control and Testing.pdf	pdf	689dd8711eca271ddda262c8	08/14/2025
Dispensing procedures	WCI - Dispensing Procedures.pdf	pdf	689dd87c1eca271ddda262dc	08/14/2025
Personnel policies including background checks	WCI - Personnel Policies Including Background Checks.pdf	pdf	689dd8861eca271ddda262f0	08/14/2025
Record Keeping procedures	WCI - Recordkeeping Procedures.pdf	pdf	689dd8901eca271ddda26307	08/14/2025
Maintaining of financial records	WCI - Maintaining of Financial Records.pdf	pdf	689dd89b1eca271ddda2631b	08/14/2025
Diversity plan	WCI - Diversity Plan.pdf	pdf	689dd8ba1eca271ddda26353	08/14/2025
Qualifications and training	WCI - Qualifications and Training.pdf	pdf	689dd8c897444ac6c4bdcc1f	08/14/2025
Energy Compliance Plan	WCI - Energy Policy.pdf	pdf	689dd8d597444ac6c4bdcc36	08/14/2025

Safety Plan for Manufacturing	WCI -PM- Safety Plan.pdf	pdf	689dd8e797444ac6c4bdcc4d	08/14/2025
Plan to Obtain Marijuana	WCI - Plan for Obtaining MJ.pdf	pdf	689dd8fd97444ac6c4bdcc61	08/14/2025
Record Keeping procedures	WCI -PM- Recordkeeping Procedures.pdf	pdf	68c21a7d566b140b4e067eb0	09/10/2025

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 - PRE FEBRUARY 27, 2024
No records found

COMPLIANCE WITH DIVERSITY PLAN
No records found

PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS
No records found

HOURS OF OPERATION

Monday From: 10:00 AM Monday To: 9:00 PM
 Tuesday From: 10:00 AM Tuesday To: 9:00 PM
 Wednesday From: 10:00 AM 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: 9:00 PM
 Sunday From: 10:00 AM Sunday To: 8:00 PM

PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

Wachusett Cannabis, Inc. (“Wachusett Cannabis”) will remain compliant at all times with the local zoning requirements set forth in the Town of Clinton Zoning By-Laws. In accordance with the Zoning Ordinance, Wachusett Cannabis’ proposed Marijuana Retail Establishment is to be located at 470 Main Street, Clinton, MA 01510 which is zoned in the Industrial District.

In compliance with 935 CMR 500.110(3) and the Zoning Ordinance, Wachusett Cannabis’ proposed facility is not located within five hundred (500) feet of a public or private school providing education to children in kindergarten or grades 1 through 12.

Wachusett Cannabis will apply for a Special Permit from Clinton’s Planning Board. Wachusett Cannabis will also apply for other local permits, approvals, registrations or certificates, if any, that are required to site and operate a Marijuana Establishment at the proposed location and will comply with all conditions and standards set forth in any such local permit or approval.

Wachusett Cannabis has engaged municipal officials and the local community to discuss its plans for a proposed Marijuana Establishment, and Wachusett Cannabis has executed the required Host Community Agreement with the Town and has conducted a community outreach meeting. Wachusett Cannabis will continue to work cooperatively with various municipal departments, boards, and officials to ensure that the establishment is compliant with all local laws, regulations, rules, and codes with respect to design, operation, and security.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

[Redacted]
 394 Main St.
 Clinton, MA 01510



9590 9402 9128 4225 6131 02

2. Article Number (Transfer from service label)

9589 0710 5270 2320 3517 77

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Redacted] Agent
 Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery
- Priority Mail Express®
- Insured Mail Restricted Delivery (over \$500)

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

[Redacted]
 22 New Harbor Rd.
 Clinton, MA 01510



9590 9402 9128 4225 6131 40

2. Article Number (Transfer from service label)

9589 0710 5270 2320 3518 14

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Redacted] Agent
 Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over \$500)
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery
- Priority Mail Express®

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

[Redacted]
 460 Main Street
 Clinton, MA 01510



9590 9402 9128 4225 6132 56

2. Article Number (Transfer from service label)

0710 5270 2320 3519 37

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Redacted] Agent
 Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over \$500)
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery
- Priority Mail Express®

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

[Redacted]
 470 Main Street
 Clinton, MA 01510



9590 9402 9128 4225 6131 19

2. Article Number (Transfer from service label)

9589 0710 5270 2320 3517 84

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X [Redacted] Agent
 Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Adult Signature
- Adult Signature Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Collect on Delivery
- Collect on Delivery Restricted Delivery
- Insured Mail
- Insured Mail Restricted Delivery (over \$500)
- Registered Mail™
- Registered Mail Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery
- Priority Mail Express®

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

970 Main Street
Clinton, MA 01510



9590 9402 9128 4225 6132 94

2. Article Number (Transfer from service label)

9589 0710 5270 2128 4188 56

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent
- B. Received by (Printed Name) Addressee
- C. Date of Delivery

D. Is delivery address different from item 1? Yes
if YES, enter delivery address below: No

- 3. Service Type
 - Priority Mail Express®
 - Adult Signature Registered Mail™
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Signature Confirmation™
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

663 Main Street
Bolton, MA 01740



9590 9402 9128 4225 6130 10

2. Article Number (Transfer from service label)

589 0710 5270 2320 3516 78

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent
- B. Received by (Printed Name) Addressee
- C. Date of Delivery

D. Is delivery address different from item 1? Yes
if YES, enter delivery address below: No

- 3. Service Type
 - Priority Mail Express®
 - Adult Signature Registered Mail™
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Signature Confirmation™
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

412 Main Street
Clinton, MA 01510



9590 9402 9128 4225 6132 49

2. Article Number (Transfer from service label)

9589 0710 5270 2320 3519 20

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent
- B. Received by (Printed Name) Addressee
- C. Date of Delivery

D. Is delivery address different from item 1? Yes
if YES, enter delivery address below: No

- 3. Service Type
 - Priority Mail Express®
 - Adult Signature Registered Mail™
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Signature Confirmation™
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

221 Main Street
Bolton, MA 01505



9590 9402 9128 4225 6130 27

2. Article Number (Transfer from service label)

99 0710 5270 2320 3516 92

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent
- B. Received by (Printed Name) Addressee
- C. Date of Delivery

D. Is delivery address different from item 1? Yes
if YES, enter delivery address below: No

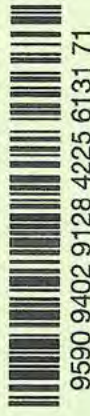
- 3. Service Type
 - Priority Mail Express®
 - Adult Signature Registered Mail™
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Signature Confirmation™
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

404 Main Street
Clinton, MA 01510



9590 9402 9128 4225 6131 71

2. Article Number (Transfer from service label)
9589 0710 5270 2320 3517 52

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SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

441 Main Street Unit 441
Clinton, MA 01510



9590 9402 9128 4225 6130 58

2. Article Number (Transfer from service label)
9589 0710 5270 2320 3517 22

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent
- B. Received by (Printed Name)
- C. Date of Delivery

D. Is delivery address different from item 1? Yes No

If YES, enter delivery address below:

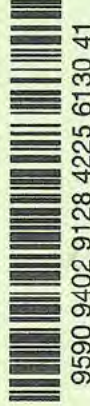
- 3. Service Type
 - Adult Signature
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery
 - Insured Mail (over \$500)
 - Priority Mail Express®
 - Registered Mail™
 - Registered Mail Restricted Delivery
 - Signature Confirmation™
 - Signature Confirmation Restricted Delivery

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

140 Wrecker Street
West Boylston, MA 01583



9590 9402 9128 4225 6130 41

2. Article Number (Transfer from service label)
9589 0710 5270 2320 3517 15

PS Form 3811, July 2020 PSN 7530-02-000-9053

SENDER: COMPLETE THIS SECTION

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1. Article Addressed to:

441 Main Street Unit 441
Clinton, MA 01510



9590 9402 9128 4225 6130 96

2. Article Number (Transfer from service label)
9589 0710 5270 2320 3517 60

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent
- B. Received by (Printed Name)
- C. Date of Delivery

D. Is delivery address different from item 1? Yes No

If YES, enter delivery address below:

- 3. Service Type
 - Adult Signature
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery
 - Insured Mail (over \$500)
 - Priority Mail Express®
 - Registered Mail™
 - Registered Mail Restricted Delivery
 - Signature Confirmation™
 - Signature Confirmation Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent
- B. Received by (Printed Name)
- C. Date of Delivery

D. Is delivery address different from item 1? Yes No

If YES, enter delivery address below:

- 3. Service Type
 - Adult Signature
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery
 - Insured Mail (over \$500)
 - Priority Mail Express®
 - Registered Mail™
 - Registered Mail Restricted Delivery
 - Signature Confirmation™
 - Signature Confirmation Restricted Delivery

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature [Redacted] Agent Addressee
B. Received by (Printed Name) [Redacted] C. Date of Delivery 3/10/2025

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type Priority Mail Express® Registered Mail™ Adult Signature Restricted Delivery Certified Mail® Collect on Delivery Signature Confirmation™ Restricted Delivery Insured Mail (over \$500)

Domestic Return Receipt

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Print your name and address on the reverse so that we can return the card to you.
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1. Article Addressed to:

[Redacted] 420 Main Street Clinton, MA 01510



9590 9402 9128 4225 6132 32

2. Article Number (Transfer from service label)

1589 0710 5270 2320 3519 13

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature [Redacted] Agent Addressee
B. Received by (Printed Name) [Redacted] C. Date of Delivery 3/10/25

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type Priority Mail Express® Registered Mail™ Adult Signature Restricted Delivery Certified Mail® Collect on Delivery Signature Confirmation™ Restricted Delivery Insured Mail (over \$500)

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Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

[Redacted] 439 Main Street Clinton, MA 01510



9590 9402 9128 4225 6132 01

2. Article Number (Transfer from service label)

1589 0710 5270 2320 3518 76

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature [Redacted] Agent Addressee
B. Received by (Printed Name) [Redacted] C. Date of Delivery [Redacted]

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type Priority Mail Express® Registered Mail™ Adult Signature Restricted Delivery Certified Mail® Collect on Delivery Signature Confirmation™ Restricted Delivery Insured Mail (over \$500)

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

[Redacted] 695 Main Street Suite 1 Lancaster, MA 01523



9590 9402 9128 4225 6130 65

2. Article Number (Transfer from service label)

1589 0710 5270 2320 3517 39

PS Form 3811, July 2020 PSN 7530-02-000-9053

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
Print your name and address on the reverse so that we can return the card to you.
Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

[Redacted] 72 Sheep St. Unit A-7 Hingham, MA 02043



9590 9402 9128 4225 6131 95

2. Article Number (Transfer from service label)

1589 0710 5270 2320 3518 69

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature [Redacted] Agent Addressee
B. Received by (Printed Name) [Redacted] C. Date of Delivery 3-1-25

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type Priority Mail Express® Registered Mail™ Adult Signature Restricted Delivery Certified Mail® Collect on Delivery Signature Confirmation™ Restricted Delivery Insured Mail (over \$500)

Domestic Return Receipt

From: Wachusett Cannabis, Inc
[Redacted]
Clinton, MA 01510

CERTIFIED MAIL

Retail



01510

9589 0710 5270 2320 3519 44

RDC 99

U.S. POSTAGE
FCM LETTER
CLINTON, MA
MAR 06, 2025

\$9.68

S2324P50644

MBLU 54-2487
467 - 469 MAIN ST
[Redacted]
467 - 469 MAIN ST
CLINTON, MA 01510

UNCLAIMED

NL
3-8

NIXIE 015 CE 1 7298/30
RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD
BC: [Redacted] *1821-05643-0

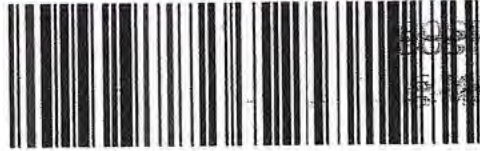
9589071052702320351944

UNC

CERTIFIED MAIL

Retail

From: Wachusett Cannabis, Inc
[Redacted]



01510

9589 0710 5270 2320 3517 91

RDC 99

U.S. POSTAGE
FCM LETTER
CLINTON, MA
MAR 06, 2025

\$9.68

S2324P5

[Redacted]
459 - 461 MAIN ST
CLINTON, MA 01510

NL
3/8

NIXIE 015 DE 1 0003/30
RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD
BC: 01510242361 *1821-05532-06

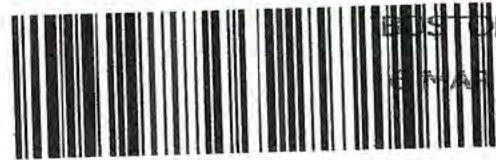
9589071052702320351791

ANK

CERTIFIED MAIL

Retail

From: Wachusett Cannabis, Inc
[Redacted]



01510

9589 0710 5270 2320 3518 90

RDC 99

U.S. POSTAGE
FCM LETTER
CLINTON, MA
MAR 06, 2025

\$9.68

S2324P5

MBLU 54-1548
[Redacted]
1 UNION ST
CLINTON, MA 01510

BC

Refus
3-11
3-16
3/25

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X</p> <p>B. Received by (<i>Printed Name</i>) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <div style="background-color: black; width: 100px; height: 20px; margin-bottom: 5px;"></div> <p>467-469 Main Street Clinton, MA 01500</p>	<p>3. Service Type <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>
<p>9590 9402 9128 4225 6132 63</p> <p>2. Article Number (<i>Transfer from service label</i>)</p> <p>9589 0710 5270 2320 3519 44</p>	<p>PS Form 3811, July 2020 PSN 7530-02-000-000</p> <p style="text-align: right;">Domestic Return Receipt</p>

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X</p> <p>B. Received by (<i>Printed Name</i>) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <div style="background-color: black; width: 100px; height: 20px; margin-bottom: 5px;"></div> <p>459-461 Main St. Clinton, MA 01500</p>	<p>3. Service Type <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>
<p>9590 9402 9128 4225 6131 26</p> <p>2. Article Number (<i>Transfer from service label</i>)</p> <p>9589 0710 5270 2320 3517 91</p>	<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p> <p style="text-align: right;">Domestic Return Receipt</p>

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X</p> <p>B. Received by (<i>Printed Name</i>) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <div style="background-color: black; width: 100px; height: 20px; margin-bottom: 5px;"></div> <p>451-453 Main Street Clinton, MA 01500</p>	<p>3. Service Type <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery</p>
<p>9590 9402 9128 4225 6132 25</p>	<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p> <p style="text-align: right;">Domestic Return Receipt</p>

From: Wachusett Cannabis, Inc.

CERTIFIED MAIL



9589 0710 5270 2320 3518 38

Retail



01510

U.S. POSTAL SERVICE
FCM LETTER
CLINTON, MA
MAR 06, 2018

\$9.60

S2324P50

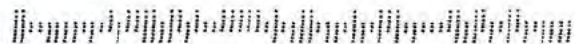
RDC 99

MBLU 54-1390

1 UNION ST
CLINTON, MA 01510

Refused
3-11
3-16
3-26

01510-291601



From: Wachusett Cannabis, Inc.

CERTIFIED MAIL



9589 0710 5270 2320 3518 07

Retail



01510

U.S. POSTAL SERVICE
FCM LETTER
CLINTON, MA
MAR 06, 2018

\$9.60

S2324P50

RDC 99

MBLU 85-2363

500 MAIN ST
CLINTON, MA 01510

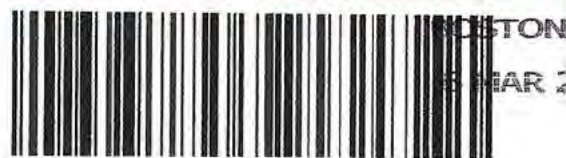
VAC
3-10
3-15
3-21

01510-240000



From: Wachusett Cannabis, Inc.

CERTIFIED MAIL



9589 0710 5270 2320 3519 68

Retail



01510

U.S. POSTAL SERVICE
FCM LETTER
CLINTON, MA
MAR 06, 2018

\$9.60

S2324P50

RDC 99

MBLU 85-377

500 MAIN ST., SUITE 206
CLINTON, MA 01510

VAC
3-10


NIXIE

015 CE 1

7202/17


RETURN TO SENDER
VACANT

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY		
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X</p>		
<p>1. Article Addressed to:</p> <div style="background-color: black; width: 100px; height: 20px; margin-bottom: 5px;"></div> <p style="margin-left: 20px;">1 Union St. Clinton, MA 01510</p>  <p style="text-align: center;">9590 9402 9128 4225 6131 64</p>	<p>B. Received by (<i>Printed Name</i>)</p> <p>C. Date of Delivery</p>		
<p>2. Article Number (<i>Transfer from service label</i>)</p> <p style="font-size: 1.2em; font-weight: bold;">9589 0710 5270 2320 3518 38</p> <p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>		
<p>3. Service Type</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail </td> <td style="width: 50%; border: none;"> <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery </td> </tr> </table>		<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery		
<p>Insured Mail Restricted Delivery (over \$500)</p>			
<p>Domestic Return Receipt</p>			


PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY		
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X</p>		
<p>1. Article Addressed to:</p> <div style="background-color: black; width: 100px; height: 20px; margin-bottom: 5px;"></div> <p style="margin-left: 20px;">500 Main Street Clinton, MA 01510</p>  <p style="text-align: center;">9590 9402 9128 4225 6131 33</p>	<p>B. Received by (<i>Printed Name</i>)</p> <p>C. Date of Delivery</p>		
<p>2. Article Number (<i>Transfer from service label</i>)</p> <p style="font-size: 1.2em; font-weight: bold;">9589 0710 5270 2320 3518 07</p> <p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>		
<p>3. Service Type</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail </td> <td style="width: 50%; border: none;"> <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery </td> </tr> </table>		<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery		
<p>Insured Mail Restricted Delivery (over \$500)</p>			
<p>Domestic Return Receipt</p>			

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY		
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X</p>		
<p>1. Article Addressed to:</p> <div style="background-color: black; width: 100px; height: 20px; margin-bottom: 5px;"></div> <p style="margin-left: 20px;">500 Main Street, Suite 206 Clinton, MA 01510</p>  <p style="text-align: center;">9590 9402 9128 4225 6132 87</p>	<p>B. Received by (<i>Printed Name</i>)</p> <p>C. Date of Delivery</p>		
<p>2. Article Number (<i>Transfer from service label</i>)</p> <p style="font-size: 1.2em; font-weight: bold;">9589 0710 5270 2320 3518 07</p> <p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>		
<p>3. Service Type</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery </td> <td style="width: 50%; border: none;"> <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ </td> </tr> </table>		<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™		
<p>Insured Mail Restricted Delivery (over \$500)</p>			
<p>Domestic Return Receipt</p>			

From Wachusett Cannabis, Inc.

CERTIFIED MAIL



9589 0710 5270 2320 3518 45

Retail



01510

U.S. POST
FCM LETTER
CLINTON,
MAR 06, 20

\$9.68

S2324P506

RDC 99

MBLU 85-1436

500 MAIN ST
CLINTON, MA 01510

NIXIE 015 CE 1 7203/1
RETURN TO SENDER
VACANT
UNABLE TO FORWARD
VAC
BC: 01510134103 *1821-05933-0

CERTIFIED MAIL

From Wachusett Cannabis, Inc.



9589 0710 5270 2320 3519 51

Retail



01775

U.S. POST
FCM LETTER
CLINTON,
MAR 06, 20

\$9.68

S2324P506

RDC 99

MBLU 54-2427

200 MAPLE ST
STOW, MA 01775

NIXIE 015 CE 1 7204/01
RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD
UNC
BC: 01510134103 *1821-05954-0

UNC

*28
3/13
Return 3/20*

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

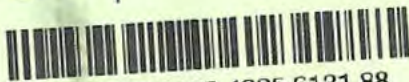
SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:



500 Main St
Clinton, MA 01510



9590 9402 9128 4225 6131 88

2. Article Number (Transfer from service label)

9589 0710 5270 2320 3518 45

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type
- Adult Signature
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery
 - Insured Mail
 - Insured Mail Restricted Delivery (over \$500)
 - Priority Mail Express®
 - Registered Mail™
 - Registered Mail Restricted Delivery
 - Signature Confirmation™
 - Signature Confirmation Restricted Delivery

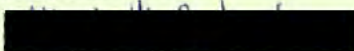
Domestic Return Receipt

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:



200 Maple Street
Stow, WA 01775



9590 9402 9128 4225 6132 70

2. Article Number (Transfer from service label)

9589 0710 5270 2320 3519 51

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type
- Adult Signature
 - Adult Signature Restricted Delivery
 - Certified Mail®
 - Certified Mail Restricted Delivery
 - Collect on Delivery
 - Collect on Delivery Restricted Delivery
 - Insured Mail
 - Insured Mail Restricted Delivery (over \$500)
 - Priority Mail Express®
 - Registered Mail™
 - Registered Mail Restricted Delivery
 - Signature Confirmation™
 - Signature Confirmation Restricted Delivery

Domestic Return Receipt

From: Wachusett Cannabis, Inc.

CERTIFIED MAIL



9589 0710 5270 2320 3518 83

Retail



01510

U.S. POSTAGE
FCM LETTER
CLINTON, MA
MAR 06, 2024

\$9.68

RDC 99

S2324P50644

MBLU 85-297

500 MAIN ST
CLINTON, MA 01510

NIXIE 015 CE 1 7204/29

RETURN TO SENDER
VACANT
UNABLE TO FORWARD

BC: 01510134103 *1821-05610-0

01510-243899

From: Wachusett Cannabis, Inc.

CERTIFIED MAIL



9589 0710 5270 2320 3518 21

Retail



01510

U.S. POSTAGE
FCM LETTER
CLINTON, MA
MAR 06,

\$9.6

RDC 99

S2324P5


UNCL

-T-S- 015102026-1N 009 04/1


RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD
RETURN TO SENDER

01510-241026

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to: <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> 474 Main Street Clinton, MA 01510</p>  <p style="text-align: center;">9590 9402 9128 4225 6132 18</p> <p>2. Article Number (Transfer from service label)</p>	<p>A. Signature <input checked="" type="checkbox"/> Addressee <input type="checkbox"/> Agent</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <table style="width: 100%; font-size: x-small;"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Registered Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery		<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Registered Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Collect on Delivery Restricted Delivery																	
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Registered Mail Restricted Delivery (over \$500)																	
<p>9589 0710 5270 2320 3518 83</p> <p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>	<p>Domestic Return Receipt</p>																

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to: <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> 26 New Harbor Rd. Clinton, MA 01510</p>  <p style="text-align: center;">9590 9402 9128 4225 6131 57</p>	<p>A. Signature <input checked="" type="checkbox"/> Addressee <input type="checkbox"/> Agent</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <table style="width: 100%; font-size: x-small;"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Registered Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery		<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Registered Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Collect on Delivery Restricted Delivery																	
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Registered Mail Restricted Delivery (over \$500)																	
<p>21</p>	<p>Domestic Return Receipt</p>																

9589 0710 5270 2320 3517 08

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
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For delivery information, visit our website at www.usps.com®.

Berlin, MA 01503

Certified Mail Fee	\$4.85	0510
\$	\$4.10	07
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	 Postmark Here 03/06/2025
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.73	
Total Postage and Fees	\$9.68	
Sent To [REDACTED]		
Street and Apt. No., or PO Box No.		
25 Linden Street		
City, State, ZIP+4®		
Berlin, MA 01503		

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

9589 0710 5270 2320 3517 39

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Lancaster, MA 01523

Certified Mail Fee	\$4.85	0510
\$	\$4.10	07
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	 Postmark Here 03/06/2025
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.73	
Total Postage and Fees	\$9.68	
Sent To [REDACTED]		
Street and Apt. No., or PO Box No.		
695 Main Street, Suite 1		
City, State, ZIP+4®		
Lancaster, MA 01523		

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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Bolton, MA 01740

Certified Mail Fee	\$4.85	0510
\$	\$4.10	07
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	 Postmark Here 03/06/2025
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.73	
Total Postage and Fees	\$9.68	
Sent To [REDACTED]		
Street and Apt. No., or PO Box No.		
663 Main Street		
City, State, ZIP+4®		
Bolton, MA 01740		

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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

West Boylston, MA 01583

Certified Mail Fee	\$4.85	0510
\$	\$4.10	07
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	 Postmark Here 03/06/2025
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.73	
Total Postage and Fees	\$9.68	
Sent To [REDACTED]		
Street and Apt. No., or PO Box No.		
140 Worcester Street		
City, State, ZIP+4®		
West Boylston, MA 01583		

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Boylston, MA 01505

Certified Mail Fee	\$4.85	0510
\$	\$4.10	07
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	 Postmark Here 03/06/2025
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.73	
Total Postage and Fees	\$9.68	
Sent To [REDACTED]		
Street and Apt. No., or PO Box No.		
221 Main Street		
City, State, ZIP+4®		
Boylston, MA 01505		

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Sterling, MA 01564

Certified Mail Fee	\$4.85	0510
\$	\$4.10	07
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	 Postmark Here 03/06/2025
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.73	
Total Postage and Fees	\$9.68	
Sent To [REDACTED]		
Street and Apt. No., or PO Box No.		
1 Park Square		
City, State, ZIP+4®		
Sterling, MA 01564		

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

9589 0710 5270 2320 3517 53
9589 0710 5270 2320 3517 60
9589 0710 5270 2320 3517 84
9589 0710 5270 2320 3517 91

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Clinton, MA 01510

Certified Mail Fee	\$4.85	0510 07
\$	\$4.10	
Extra Services & Fees (check box, add fee as appropriate)		MAR - 6 2025 Postmark Here
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.73	03/06/2025
Total Postage and Fees	\$9.68	
\$	\$	
Sent To	[REDACTED]	
Street and Apt. No., or PO Box No.	476 Main Street	
City, State, ZIP+4®	Clinton, MA 01510	
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Clinton, MA 01510

Certified Mail Fee	\$4.85	0510 07
\$	\$4.10	
Extra Services & Fees (check box, add fee as appropriate)		MAR - 6 2025 Postmark Here
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.73	03/06/2025
Total Postage and Fees	\$9.68	
\$	\$	
Sent To	[REDACTED]	
Street and Apt. No., or PO Box No.	500 Main St	
City, State, ZIP+4®	Clinton, MA 01510	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions.		

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Clinton, MA 01510

Certified Mail Fee	\$4.85	0510 07
\$	\$4.10	
Extra Services & Fees (check box, add fee as appropriate)		MAR - 6 2025 Postmark Here
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.73	03/06/2025
Total Postage and Fees	\$9.68	
\$	\$	
Sent To	[REDACTED]	
Street and Apt. No., or PO Box No.	441 Main Street, Unit 441	
City, State, ZIP+4®	Clinton, MA 01510	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions.		

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Clinton, MA 01510

Certified Mail Fee	\$4.85	0510 07
\$	\$4.10	
Extra Services & Fees (check box, add fee as appropriate)		MAR - 6 2025 Postmark Here
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.73	03/06/2025
Total Postage and Fees	\$9.68	
\$	\$	
Sent To	[REDACTED]	
Street and Apt. No., or PO Box No.	394 Main Street	
City, State, ZIP+4®	Clinton, MA 01510	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions.		

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Clinton, MA 01510

Certified Mail Fee	\$4.85	0510 07
\$	\$4.10	
Extra Services & Fees (check box, add fee as appropriate)		MAR - 6 2025 Postmark Here
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.73	03/06/2025
Total Postage and Fees	\$9.68	
\$	\$	
Sent To	[REDACTED]	
Street and Apt. No., or PO Box No.	470 Main Street	
City, State, ZIP+4®	Clinton, MA 01510	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions.		

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Clinton, MA 01510

Certified Mail Fee	\$4.85	0510 07
\$	\$4.10	
Extra Services & Fees (check box, add fee as appropriate)		MAR - 6 2025 Postmark Here
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$0.73	03/06/2025
Total Postage and Fees	\$9.68	
\$	\$	
Sent To	[REDACTED]	
Street and Apt. No., or PO Box No.	454-461 Main St.	
City, State, ZIP+4®	Clinton, MA 01510	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions.		

9589 0710 5270 2320 3519 44
9589 0710 5270 2320 3519 51
9589 0710 5270 2320 3519 56
9589 0710 5270 2320 3519 68

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Clinton, MA 01510

Certified Mail Fee \$4.85
\$4.10
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 \$0.73

Total Postage and Fees \$9.68

Sent To

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

City, State, ZIP+4®

412 Main Street
Clinton, MA 01510

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Clinton, MA 01510

Certified Mail Fee \$4.85
\$4.10
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 \$0.73

Total Postage and Fees \$9.68

Sent To

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

City, State, ZIP+4®

460 Main Street
Clinton, MA 01510

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

Clinton, MA 01510

Certified Mail Fee \$4.85
\$4.10
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 \$0.73

Total Postage and Fees \$9.68

Sent To

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

City, State, ZIP+4®

470 Main St
Clinton, MA 01510

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

Clinton, MA 01510

Certified Mail Fee \$4.85
\$4.10
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 \$0.73

Total Postage and Fees \$9.68

Sent To

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

City, State, ZIP+4®

467-469 Main St
Clinton, MA 01510

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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

Stow, MA 01775

Certified Mail Fee \$4.85
\$4.10
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 \$0.73

Total Postage and Fees \$9.68

Sent To

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

City, State, ZIP+4®

220 Maple St
Stow, MA 01775

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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

Clinton, MA 01510

Certified Mail Fee \$4.85
\$4.10
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 \$0.73

Total Postage and Fees \$9.68

Sent To

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

City, State, ZIP+4®

500 Main St, Suite 206
Clinton, MA 01510

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

9589 0710 5270 2320 3518 13

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

Clinton, MA 01510

Certified Mail Fee	\$4.85
\$	\$4.10
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage	\$0.73
\$	\$9.68
Total Postage and Fees	

Sent To [Redacted]
 Street and Apt. No., or PO Box No.
 City, State, ZIP+4®
 420 Main Street
 Clinton, MA 01510

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions



9589 0710 5270 2320 3518 13

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

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

Clinton, MA 01510

Certified Mail Fee	\$4.85
\$	\$4.10
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage	\$0.73
\$	\$9.68
Total Postage and Fees	

Sent To [Redacted]
 Street and Apt. No., or PO Box No.
 City, State, ZIP+4®
 421 Main Street
 Clinton, MA 01510

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions



9589 0710 5270 2320 3518 90

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

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

Clinton, MA 01510

Certified Mail Fee	\$4.85
\$	\$4.10
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage	\$0.73
\$	\$9.68
Total Postage and Fees	

Sent To [Redacted]
 Street and Apt. No., or PO Box No.
 City, State, ZIP+4®
 457-453 Main Street
 Clinton, MA 01510

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions



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

Clinton, MA 01510

Certified Mail Fee	\$4.85
\$	\$4.10
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage	\$0.73
\$	\$9.68
Total Postage and Fees	

Sent To [Redacted]
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 City, State, ZIP+4®
 439 Main Street
 Clinton, MA 01510

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions



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Hingham, MA 02043

Certified Mail Fee	\$4.85
\$	\$4.10
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage	\$0.73
\$	\$9.68
Total Postage and Fees	

Sent To [Redacted]
 Street and Apt. No., or PO Box No.
 City, State, ZIP+4®
 72 Sharp St. Unit A-7
 Hingham, MA 02043

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions



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\$	\$4.10
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<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage	\$0.73
\$	\$9.68
Total Postage and Fees	

Sent To [Redacted]
 Street and Apt. No., or PO Box No.
 City, State, ZIP+4®
 404 Main Street
 Clinton, MA 01510

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions



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

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Clinton, MA 01510

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 Street and Apt. No., or PO Box No.
 City, State, ZIP+4®
 490 Main Street
 Clinton, MA 01510

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions



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Total Postage and Fees	\$9.68

Sent To [Redacted]
 Street and Apt. No., or PO Box No.
 City, State, ZIP+4®
 1 Union St
 Clinton, MA 01510

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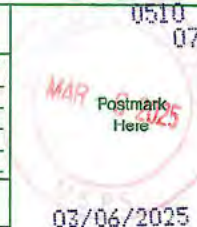
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<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00

Postage	\$0.73
Total Postage and Fees	\$9.68

Sent To [Redacted]
 Street and Apt. No., or PO Box No.
 City, State, ZIP+4®
 26 New Harbor Rd
 Clinton, MA 01510

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 City, State, ZIP+4®
 22 New Harbor Rd.
 Clinton, MA 01510

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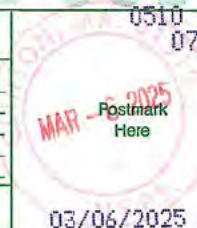
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 City, State, ZIP+4®
 500 Main Street
 Clinton, MA 01510

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions



LOCALiQ

NEW ENGLAND

PO Box 631210 Cincinnati, OH 45263-1210

AFFIDAVIT OF PUBLICATION

Wachusett Cannabis, Inc.
[REDACTED]

STATE OF MASSACHUSETTS, COUNTY OF WORCESTER

The Telegram & Gazette, a newspaper distributed in the county of Worcester, published in the City of Worcester, County of Worcester, State of Massachusetts printed and published and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issues dated on:

03/08/2025

and that the fees charged are legal.
Sworn to and subscribed before on 03/08/2025

Amy Kohott

Legal Clerk

Vicky Felty

Notary, State of WI, County of Brown

9-19-25

My commission expires

Publication Cost:	\$127.72	
Tax Amount:	\$0.00	
Payment Cost:	\$127.72	
Order No:	11106602	# of Copies:
Customer No:	1517710	0
PO #:	LNEO0253354	

THIS IS NOT AN INVOICE!

Please do not use this form for payment remittance.

VICKY FELTY
Notary Public
State of Wisconsin

Notice of Community Outreach Meeting
Wachusett Cannabis, Inc: Community Outreach Meeting

This Letter is to inform that a Community Outreach Meeting for a proposed Marijuana Retail Establishment (MRE) and Marijuana Product Manufacturing (MPM) Facility has been scheduled for Wednesday, March 26th, 2025, at 6 p.m. in the TYCA Corp. Building, Ground Floor, located at 470 Main Street, Clinton, MA 01510, in the Tyca Corp. Cafeteria.

The proposed MRE and MPM are anticipated to be located at 470 Main Street, Clinton, MA 01510. This meeting will discuss security, diversion prevention, community involvement and planning, and general operating information for the proposed facility. The public will have an opportunity to ask questions.

This Community Outreach Meeting will be held in accordance with the Massachusetts Cannabis Control Commission's applicable requirements set forth in M.G.L. ch. 94G and 935 CMR 500.000 et seq.

The public will have an opportunity to ask questions.

March 8 2025
LNEO0253354

THANK YOU for your submission!

Your notice has been submitted for publication. Below is a confirmation of your order. You will also receive an email confirmation.

ORDER DETAILS

Order Number:
LNEO0253354

Order Status:
Submitted

Classification:
Public Notices

Package:
General Package

Base amount:
127.72

Service fee:
5.10

Cash/Check/ACH

Discount:
-0.00

Total payment:
132.82

As an incentive for customers, we provide a discount off the total order cost equal to the 3.99% service fee if you pay with Cash/Check/ACH. Pay by Cash/Check/ACH and save! In no event are service fees refundable.

Payment Type:
mastercard

User ID:
L0098120

PREVIEW FOR AD NUMBER LNEO02533540

Notice of Community Outreach Meeting
Wachusett Cannabis, Inc: Community Outreach Meeting

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The public will have an opportunity to ask questions.

March 8 2025
LNEO0253354

[<< Click here to print a printer friendly version >>](#)

ACCOUNT INFORMATION

Jigar Patel
[Redacted]
[Redacted]
774-777-0202
contactjigarp@gmail.com
Wachusett Cannabis, Inc.
Contract ID:

PAYMENT DETAILS

mastercard*****2066

TRANSACTION REPORT

Date
March 5, 2025 1:10:29 PM EST

Amount:
132.82

ADDITIONAL OPTIONS

1 Affidavit

SCHEDULE FOR AD NUMBER LNEO02533540

March 8, 2025
Worcester Telegram & Gazette

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WACHUSETT CANNABIS, INC.
COMMUNITY OUTREACH MEETING

03/05/25

Wachusett Cannabis, Inc.

470 Main Street, Clinton, MA 01510

Wachusett Cannabis, Inc: Community Outreach Meeting

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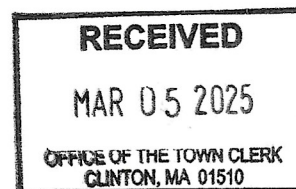
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Jigar Patel

President

Wachusett Cannabis, Inc.

contactjigarp@gmail.com



03-05-25P01:26 RCVD



WACHUSETT CANNABIS, INC.
COMMUNITY OUTREACH MEETING

03/05/25

Wachusett Cannabis, Inc.

470 Main Street, Clinton, MA 01510

Wachusett Cannabis, Inc: Community Outreach Meeting

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Jigar Patel

President

Wachusett Cannabis, Inc.

contactjigarp@gmail.com



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): 3/26/2025
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: 3/08/2025

b. Name of publication: Worcester Telegram

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

a. Date notice filed: 03/05/2025

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: 03/06/2025

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:

- a. The type(s) of ME or MTC to be located at the proposed address;
- b. Information adequate to demonstrate that the location will be maintained securely;
- c. Steps to be taken by the ME or MTC to prevent diversion to minors;
- d. A plan by the ME or MTC to positively impact the community; and
- e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.

8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.



Name of applicant:

Wachusett Cannabis, Inc.

Name of applicant's authorized representative:

Jigar Patel

Signature of applicant's authorized representative:



PLAN FOR POSITIVE IMPACT

INTENT

Cannabis prohibition has disproportionately impacted certain communities in Massachusetts. As the Commonwealth begins to embrace the adult-use cannabis industry in earnest, Wachusett Cannabis, Inc. (“WCI”) recognizes that it has a responsibility to contribute to ADI communities. Thus, WCI will focus its time and resources on serving the community of Worcester, as it is the nearest ADI community to Clinton. WCI is fully committed to ensuring that it will make positive contributions to the ADI community.

At all times, WCI will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited use of advertising, branding, marketing, and sponsorship practices of our Marijuana Retail and Product Manufacturing Establishment through all Positive Impact Initiatives.

PURPOSE

The purpose of this document is to summarize WCI’s plan to ensure the business creates a positive impact in the City of Worcester.

WCI is committed to fostering positive relationships within the community and identifying ways in which to give back. WCI seeks to utilize our resources – including time, talent and/or monies – to provide employment to those who may be underserved and/or in need. We plan to achieve these goals through diligent hiring practices.

INITIATIVES AND METRICS

WCI aims to implement the following initiatives to assist those communities that have been disproportionately impacted.

Proposed Initiative: Wachusett Cannabis will strive to hire 10% of its staff members from Areas of Disproportionate Impact. Wachusett Cannabis will seek local candidates through Indeed.com to achieve this goal. The Indeed.com job positions will be posted every 4 to 6 weeks due to high turnover of the industry in general.

Goal: Wachusett Cannabis will strive to hire 10% of its staff members from Areas of Disproportionate Impact in the City of Worcester, as identified by the Massachusetts Cannabis Control Commission.

Metrics: Wachusett Cannabis will maintain a record of its employees of people from Areas of Disproportionate Impact in Worcester. Wachusett Cannabis will keep records of feedback that we receive relative to the impact of our contributions, if any. This will in turn help us make decisions about adjustments that need to be made in the future.

Wachusett Cannabis is an equal opportunity employer that will review and assess all candidates that apply to its establishment. However, we will emphasize interviewing and hiring local candidates from these Census Tracts of Worcester County. It will not be until we meet with candidates in person and after their interview and initial collection of personal information to assess if the candidate lives within one of these Census Tracts:

Census Tract 7302, Worcester County, Massachusetts 730200 Census Tract 7305, Worcester County, Massachusetts 730500 Census Tract 7310.02, Worcester County, Massachusetts 731002 Census Tract 7312.03, Worcester County, Massachusetts 731203 Census Tract 7312.04, Worcester County, Massachusetts 731204 Census Tract 7313, Worcester County, Massachusetts 731300 Census Tract 7314, Worcester County, Massachusetts 731400 Census Tract 7315, Worcester County, Massachusetts 731500 Census Tract 7317, Worcester County, Massachusetts 731700 Census Tract 7318, Worcester County, Massachusetts 731800 Census Tract 7320.01, Worcester County, Massachusetts 732001 Census Tract 7323.02, Worcester County, Massachusetts 732302 Census Tract 7324, Worcester County, Massachusetts 732400 Census Tract 7327, Worcester County, Massachusetts 732700 Census Tract 7330, Worcester County, Massachusetts 733000

Proposed Initiative: Wachusett Cannabis has developed specific initiatives to effectuate its stated goals to positively impact the City of Worcester. Such programs will include the following:

- Creating a hiring program for Worcester residents whereby open positions will be advertised (as they become available, but not less than annually) in Worcester Telegram & Gazette.
- Hosting an educational seminar (no less than annually) for residents of Worcester. The educational seminar will be advertised on Kosa Cannabis' website, Facebook Page, and in the Worcester Telegram & Gazette. Participants will be required to attest that they are at least 21 years of age and a resident of Worcester. The educational seminars will be held virtually and will be able to accommodate no fewer than ten (10) participants. Topics covered will include cannabis retailer and product manufacturing operations, operational compliance, and cannabis business best practices.

Measurements

The Executive Management Team will administer the Plan and will be responsible for developing measurable outcomes to ensure Wachusett Cannabis continues to meet its commitments. Such measurable outcomes, in accordance with Wachusett Cannabis's goals and programs described above, include:

- Completing a demographic survey of employees to identify the percentage of employees who are residents of Worcester, and documenting advertisements placed in in Worcester Telegram & Gazette.
- Documenting the educational seminars provided, including the number of participants, copies of any advertisements, and any materials used.

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

Acknowledgements

Wachusett Cannabis will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.

- Any actions taken, or programs instituted, by Wachusett Cannabis will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

CONCLUSION

WCI will conduct continuous and regular evaluations of the implementation of its goals and at any point will retool its policies and procedures in order to better accomplish the goals set out in this Plan for Positive Impact. Any actions taken or programs instituted by WCI will not violate the CCC's regulations with respect to limitations on ownership or control or other applicable state laws.

The Commonwealth of Massachusetts, William Francis Galvin
Corporations Division

One Ashburton Place - Floor 17, Boston MA 02108-1512 | Phone: 617-727-9640

Articles of Organization

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

Minimum Filing Fee:
\$250.00

Identification Number:	001837372	(number will be assigned)
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ARTICLE I
The exact name of the corporation is:
WACHUSETT CANNABIS, INC.

ARTICLE II
Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. C156D have the purpose of engaging in any lawful business. Specify if you want a more limited purpose:
FORMED TO APPLY FOR LICENSURE FROM THE MASSACHUSETTS CANNABIS CONTROL COMMISSION

ARTICLE III										
State the total number of shares and par value, if any, of each class of stock that the corporation is authorized to issue. All corporations must authorize stock. If only one class or series is authorized, it is not necessary to specify any particular designation.										
<table border="1"><thead><tr><th>Class of Stock</th><th>Par value per share (Enter 0 if no Par)</th><th>Total authorized number of shares</th><th>Total authorized par value</th><th>Total issued and outstanding number of shares</th></tr></thead><tbody><tr><td>CNP</td><td>0</td><td>275,000</td><td>0</td><td>150,000</td></tr></tbody></table>	Class of Stock	Par value per share (Enter 0 if no Par)	Total authorized number of shares	Total authorized par value	Total issued and outstanding number of shares	CNP	0	275,000	0	150,000
Class of Stock	Par value per share (Enter 0 if no Par)	Total authorized number of shares	Total authorized par value	Total issued and outstanding number of shares						
CNP	0	275,000	0	150,000						

ARTICLE IV
If more than one class of stock is authorized, state a distinguishing designation for each class. Prior to the issuance of any shares of a class, if shares of another class are outstanding, the corporation must provide a description of the preferences, voting powers, qualifications, and special or relative rights or privileges of that class and of each other class of which shares are outstanding and of each series then established within any class.
THE TOTAL NUMBER OF SHARES OF ALL CLASSES OF STOCK WHICH THE CORPORATION SHALL HAVE AUTHORITY TO ISSUE IS 275,000, CONSISTING OF 275,000 SHARES OF COMMON STOCK, NO PAR VALUE PER SHARE ("COMMON STOCK") THE FOLLOWING IS A STATEMENT OF THE DESIGNATORS AND THE POWERS, PRIVILEGES AND RIGHTS, AND THE QUALIFICATIONS, LIMITATIONS OR RESTRICTIONS THEREOF IN RESPECT OF EACH CLASS OF CAPITAL STOCK OF THE CORPORATION. COMMON STOCK 1. VOTING. THE HOLDERS OF THE COMMON STOCK ARE ENTITLED TO ONE VOTE FOR EACH SHARE HELD AT ALL MEETINGS OF STOCKHOLDERS (AND WRITTEN ACTIONS IN LIEU OF MEETINGS). THERE SHALL BE NO CUMULATIVE VOTING. 2. DIVIDENDS. DIVIDENDS MAY BE DECLARED AND PAID ON THE COMMON STOCK FROM FUNDS LAWFULLY AVAILABLE THEREFOR AS AND WHEN DETERMINED BY THE BOARD OF DIRECTORS. 3. LIQUIDATION. UPON THE DISSOLUTION OR LIQUIDATION OF THE CORPORATION, WHETHER VOLUNTARY OR INVOLUNTARY, HOLDERS OF COMMON STOCK WILL BE ENTITLED TO RECEIVE ALL ASSETS OF THE

CORPORATION AVAILABLE FOR DISTRIBUTION TO ITS STOCKHOLDERS.

ARTICLE V

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

ANY STOCKHOLDER, INCLUDING THE HEIRS, ASSIGNS, EXECUTORS OR ADMINISTRATORS OF A DECEASED STOCKHOLDER, DESIRING TO SELL OR TRANSFER SUCH STOCK OWNED BY HIM OR THEM, SHALL FIRST OFFER IT TO THE CORPORATION THROUGH THE BOARD OF DIRECTORS, IN THE MANNER FOLLOWING:

HE/SHE SHALL NOTIFY THE DIRECTORS OF HIS/HER DESIRE TO SELL OR TRANSFER BY NOTICE IN WRITING, WHICH NOTICE SHALL CONTAIN THE PRICE AT WHICH HE/SHE IS WILLING TO SELL OR TRANSFER AND THE NAME OF ONE ARBITRATOR. THE DIRECTORS SHALL WITHIN THIRTY DAYS THEREAFTER EITHER ACCEPT THE OFFER, OR BY NOTICE TO HIM/HER IN WRITING, NAME A SECOND ARBITRATOR, AND THESE TWO SHALL NAME A THIRD. IT SHALL THEN BE THE DUTY OF THE ARBITRATORS TO ASCERTAIN THE VALUE OF THE STOCK.

AFTER THE ACCEPTANCE OF THE OFFER, OR THE REPORT OF THE ARBITRATORS AS TO THE VALUE OF THE STOCK, THE DIRECTORS SHALL HAVE THIRTY DAYS WITHIN WHICH TO PURCHASE THE SAME AT SUCH VALUATION, BUT IF AT THAT EXPIRATION OF THIRTY DAYS, THE CORPORATION SHALL NOT HAVE EXERCISED THE RIGHT TO PURCHASE, THE OWNER OF THE STOCK SHALL BE AT LIBERTY TO DISPOSE OF THE SAME IN ANY MANNER HE/SHE MAY SEE FIT.

NO SHARES OF STOCK SHALL BE SOLD OR TRANSFERRED ON THE BOOKS OF THE CORPORATION UNTIL THESE PROVISIONS HAVE BEEN COMPLIED WITH, BUT THE HOLDER OR HOLDERS OF THE MAJORITY OF THE STOCK ISSUED AND OUTSTANDING MAY IN ANY PARTICULAR INSTANCE WAIVE THE REQUIREMENT.

ARTICLE VI

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

6A. LIMITATION OF DIRECTOR LIABILITY A DIRECTOR OF THIS CORPORATION SHALL NOT BE PERSONALLY LIABLE TO THE CORPORATION OR ITS STOCKHOLDERS FOR MONETARY DAMAGES FOR BREACH OF FIDUCIARY DUTY AS A DIRECTOR, NOTWITHSTANDING ANY PROVISION OF LAWS IMPOSING SUCH LIABILITY, EXCEPT FOR LIABILITY (I) FOR ANY BREACH OF THE DIRECTOR'S DUTY OF LOYALTY TO THE CORPORATION OR STOCKHOLDERS, (II) FOR ACTS OR OMISSIONS NOT IN GOOD FAITH OR WHICH INVOLVE INTENTIONAL MISCONDUCT OR A KNOWING VIOLATION OF LAW, (III) FOR IMPROPER DISTRIBUTIONS UNDER SECTION 6.40 OF CHAPTER 156D OF THE MASSACHUSETTS GENERAL LAWS OR (IV) FOR ANY TRANSACTION FROM WHICH THE DIRECTOR DERIVED AN IMPROPER PERSONAL BENEFIT. NO AMENDMENT TO OR REPEAL OF THIS PROVISION SHALL APPLY TO OR HAVE ANY EFFECT ON THE LIABILITY OR ALLEGED LIABILITY OF ANY DIRECTOR OF THE CORPORATION FOR OR WITH RESPECT TO ANY ACTS OR OMISSIONS OF SUCH DIRECTOR OCCURRING PRIOR TO SUCH AMENDMENT.

6B. INDEMNIFICATION 1. THE CORPORATION SHALL, TO THE FULLEST EXTENT PERMITTED BY THE APPLICABLE PROVISIONS OF CHAPTER 156D OF THE MASSACHUSETTS GENERAL LAWS, AS AMENDED FROM TIME TO TIME, INDEMNIFY EACH PERSON WHO WAS OR IS A PARTY OR IS THREATENED TO BE MADE A PARTY TO ANY THREATENED, PENDING OR COMPLETED ACTION, SUIT OR PROCEEDING, WHETHER CIVIL, CRIMINAL, ADMINISTRATIVE OR INVESTIGATIVE, BY REASON OF THE FACT THAT HE IS OR WAS, OR HAS AGREED TO BECOME, A DIRECTOR OR OFFICER OF THE CORPORATION, OR IS OR WAS, OR HAS AGREED TO BECOME, A DIRECTOR OR OFFICER OF THE CORPORATION, OR IS OR WAS SERVING, OR HAS AGREED TO SERVE, AT THE REQUEST OF THE CORPORATION, AS A DIRECTOR OF OFFICER OF, OR IN A SIMILAR CAPACITY WITH, ANOTHER ORGANIZATION OR IN ANY CAPACITY WITH RESPECT TO ANY EMPLOYEE BENEFIT PLAN OF THE CORPORATION, OR BY REASON OF ANY ACTION ALLEGED TO HAVE BEEN TAKEN OR OMITTED IN SUCH CAPACITY, AGAINST ALL EXPENSES (INCLUDING ATTORNEY FEES), JUDGMENTS, FINES AND AMOUNTS PAID IN SETTLEMENT INCURRED BY HIM OR ON HIS BEHALF IN CONNECTION WITH SUCH ACTION, SUIT OR PROCEEDING AND ANY APPEAL THEREFROM, UNLESS SUCH PERSON SHALL BE FINALLY ADJUDICATED IN SUCH ACTION, SUIT OR PROCEEDING NOT TO HAVE ACTED IN GOOD

FAITH IN THE REASONABLE BELIEF THAT HIS ACTION WAS IN THE BEST INTERESTS OF THE CORPORATION OR, THAT HIS CONDUCT WAS AT LEAST NOT OPPOSED TO THE BEST INTERESTS OF THE CORPORATION AND IN THE CASE OF ANY CRIMINAL PROCEEDINGS HE HAD REASONABLE CAUSE TO BELIEVE HIS CONDUCT WAS UNLAWFUL OR TO THE EXTENT SUCH MATTER RELATES TO SERVICE WITH RESPECT TO AN EMPLOYEE BENEFIT PLAN, IN THE BEST INTERESTS OF THE PARTICIPANTS OR BENEFICIARIES OF SUCH EMPLOYEE BENEFIT PLAN OR HIS CONDUCT AT LEAST NOT OPPOSED TO THE BEST INTERESTS OF THE CORPORATION. 2. NOTWITHSTANDING THE PROVISIONS OF SECTION 1 OF THIS ARTICLE 6B, IN THE EVENT THAT A PENDING OR THREATENED ACTION, SUIT OR PROCEEDING IS COMPROMISED OR SETTLED IN A MANNER WHICH IMPOSES ANY LIABILITY OR OBLIGATION UPON ANY PERSON IN A MATTER FOR WHICH SUCH PERSON WOULD OTHERWISE BE ENTITLED TO INDEMNIFICATION HEREUNDER, NO INDEMNIFICATION SHALL BE PROVIDED TO SUCH PERSON WITH RESPECT TO SUCH MATTER IF IT IS DETERMINED, PURSUANT TO SECTION 4 OF THIS ARTICLE 6B, ON THE BASIS OF FACTS KNOWN AT THAT TIME (WITHOUT INDEPENDENT INVESTIGATION), THAT SUCH PERSON DID NOT ACT IN GOOD FAITH IN THE REASONABLE BELIEF THAT HIS ACTION WAS IN THE BEST INTERESTS OF THE CORPORATION OR, THAT HIS CONDUCT WAS AT LEAST NOT OPPOSED TO THE BEST INTERESTS OF THE CORPORATION AND IN THE CASE OF ANY CRIMINAL PROCEEDINGS HE HAD REASONABLE CAUSE TO BELIEVE HIS CONDUCT WAS UNLAWFUL OR TO THE EXTENT SUCH MATTER RELATES TO SERVICE WITH RESPECT TO AN EMPLOYEE BENEFIT PLAN, IN THE BEST INTERESTS OF THE PARTICIPANTS OR BENEFICIARIES OF SUCH EMPLOYEE BENEFIT PLAN OR HIS CONDUCT AT LEAST NOT OPPOSED TO THE BEST INTERESTS OF THE CORPORATION. 3. INDEMNIFICATION MAY INCLUDE PAYMENT BY THE CORPORATION OF EXPENSES IN DEFENDING AN ACTION OR PROCEEDING IN ADVANCE OF THE FINAL DISPOSITION OF SUCH ACTION OR PROCEEDING UPON RECEIPT OF AN AFFIRMATION AND UNDERTAKING AS REQUIRED IN SECTION 8.53 OF CHAPTER 156D OF THE MASSACHUSETTS GENERAL LAWS BY THE PERSON INDEMNIFIED THAT HE ACTED IN A GOOD FAITH BELIEF HE HAS MET THE RELEVANT STANDARD OF CONDUCT DESCRIBED IN SECTION 8.51 OF CHAPTER 156D OF THE MASSACHUSETTS GENERAL LAWS TO REPAY SUCH PAYMENT IF IT IS ULTIMATELY DETERMINED THAT SUCH PERSON IS NOT ENTITLED TO INDEMNIFICATION UNDER THIS ARTICLE 6B, WHICH UNDERTAKING MAY BE ACCEPTED WITHOUT REFERENCE TO THE FINANCIAL ABILITY OF SUCH PERSON TO MAKE SUCH REPAYMENT. 4. ANY DETERMINATION OF WHETHER A PERSON IS ENTITLED TO INDEMNIFICATION PURSUANT TO SECTION 2 OF THIS ARTICLE 6B SHALL BE MADE BY: (A) A MAJORITY VOTE OF A QUORUM OF THE DIRECTORS OF THE CORPORATION CONSISTING OF PERSONS WHO ARE NOT AT THAT TIME PARTIES TO THE ACTION, SUIT OR PROCEEDING IN QUESTION ("DISINTERESTED DIRECTOR"), (B) IF NO SUCH QUORUM IS OBTAINABLE, A MAJORITY VOTE OF A COMMITTEE OF TWO OR MORE DISINTERESTED DIRECTORS, (C) A MAJORITY VOTE OF A QUORUM OF THE OUTSTANDING SHARES OF STOCK OF ALL CLASSES ENTITLED TO VOTE FOR DIRECTORS, VOTING AS A SINGLE CLASS, WHICH QUORUM SHALL CONSIST OF STOCKHOLDERS WHO ARE NOT AT THAT TIME PARTIES TO THE ACTION, SUIT OR PROCEEDING IN QUESTION, (D) INDEPENDENT LEGAL COUNSEL (WHO MAY BE REGULAR LEGAL COUNSEL TO THE CORPORATION) APPOINTED FOR SUCH PURPOSE BY VOTE OF THE DIRECTORS IN THE MANNER SPECIFIED IN CLAUSE (A) OR (B) ABOVE, OR (E) A COURT OF COMPETENT JURISDICTION. 5. THE CORPORATION SHALL NOT INDEMNIFY ANY SUCH PERSON SEEKING INDEMNIFICATION IN CONNECTION WITH A PROCEEDING (OR PART THEREOF) INITIATED BY SUCH PERSON UNLESS THE INITIATION THEREOF WAS APPROVED BY THE BOARD OF DIRECTORS OF THE CORPORATION. 6. THE INDEMNIFICATION RIGHTS PROVIDED IN THIS ARTICLE (I) SHALL NOT BE DEEMED EXCLUSIVE OF ANY OTHER RIGHTS TO WHICH THOSE INDEMNIFIED MAY BE ENTITLED UNDER ANY LAW, AGREEMENT OR VOTE OF STOCKHOLDERS OR DISINTERESTED DIRECTORS OR OTHERWISE, AND (II) SHALL INURE TO THE BENEFIT OF THE HEIRS, EXECUTORS AND ADMINISTRATORS OF SUCH PERSONS. THE CORPORATION MAY, TO THE EXTENT AUTHORIZE FROM TIME TO TIME BY ITS BOARD OF DIRECTORS, GRANT INDEMNIFICATION RIGHTS TO THE OTHER EMPLOYEES OR AGENTS OF THE CORPORATION OR OTHER PERSONS SERVING THE CORPORATION AND SUCH RIGHTS MAY BE EQUIVALENT TO, OR GREATER OR LESS THAN, THOSE SET FORTH IN THIS ARTICLE 6B.

6C. OTHER PROVISIONS (A) THE DIRECTORS MAY MAKE, AMEND, OR REPEAL THE BYLAWS IN WHOLE OR IN PART, EXCEPT WITH RESPECT TO ANY PROVISIONS OF SUCH BYLAWS WHICH BY LAW OR THESE ARTICLES OR THE BYLAWS REQUIRES ACTION BY THE STOCKHOLDERS. (B) MEETINGS OF THE STOCKHOLDERS OF THE CORPORATION MAY BE HELD ANYWHERE IN THE UNITED STATES. (C) THE CORPORATION SHALL HAVE THE POWER TO BE A PARTNER IN ANY BUSINESS ENTERPRISE WHICH THIS CORPORATION WOULD HAVE THE POWER TO CONDUCT BY ITSELF. (D) THE CORPORATION, BY VOTE OF A MAJORITY OF THE STOCK OUTSTANDING AND ENTITLED TO VOTE THEREON (OR IF THERE ARE TWO OR MORE CLASSES OF STOCK ENTITLED TO VOTE AS SEPARATE CLASSES, THEN BY VOTE OF A MAJORITY OF EACH SUCH CLASS OF STOCK OUTSTANDING), MAY (I) AUTHORIZE ANY AMENDMENT TO ITS ARTICLES OF ORGANIZATION PURSUANT TO SECTION 10.03 OF CHAPTER 156D OF THE MASSACHUSETTS GENERAL LAWS, AS

AMENDED FROM TIME TO TIME; (II) AUTHORIZE THE SALE, LEASE OR EXCHANGE OF ALL OR SUBSTANTIALLY ALL OF ITS PROPERTY AND ASSETS, INCLUDING ITS GOODWILL, PURSUANT TO SECTION 12.02 OF CHAPTER 156D OF THE MASSACHUSETTS GENERAL LAWS, AS AMENDED FROM TIME TO TIME; AND (III) APPROVE AN AGREEMENT OF MERGER OR CONSOLIDATION PURSUANT TO SECTION 11.06 OF CHAPTER 156D OF THE MASSACHUSETTS GENERAL LAWS, AS AMENDED FROM TIME TO TIME. (E) THE CORPORATION'S BOARD OF DIRECTORS MAY CONSIST OF ONLY 1 INDIVIDUAL REGARDLESS OF THE NUMBER OF SHAREHOLDERS.

ARTICLE VII

The effective date of organization shall be the date and time the articles were received for filing if the articles are not rejected within the time prescribed by law. If a later effective date is desired, specify such date, which may not be later than ninety (90) days from the date and time of filing

Later Effective Date (mm/dd/yyyy):

Time (HH:MM)

ARTICLE VIII

The information contained in Article VIII is not a permanent part of the articles of organization.

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

Agent name: JIGAR PATEL

Number and street: 3 CRAIG DRIVE

Address 2:

City or town: CLINTON

State: MA

Zip code: 01510

c. The names and street addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

Title	Individual Name	Address
PRESIDENT	JIGAR PATEL	3 CRAIG DRIVE CLINTON, MA 01510 USA
TREASURER	JIGAR PATEL	3 CRAIG DRIVE CLINTON, MA 01510 USA
SECRETARY	JIGAR PATEL	3 CRAIG DRIVE CLINTON, MA 01510 USA
DIRECTOR	JIGAR PATEL	3 CRAIG DRIVE CLINTON, MA 01510 USA

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

December 31

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

APPLYING FOR A LICENSE WITH THE CANNABIS CONTROL COMMISSION

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

Number and street: 3 CRAIG DRIVE

Address 2:

City or town: CLINTON

State: MA

Zip

01510

code:

Country: UNITED STATES

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

Number and street: 3 CRAIG DRIVE

Address 2:

City or town: CLINTON State: MA Zip code: 01510

Country: UNITED STATES

Which is:

its principal office

an office of its transfer agent

an office of its secretary/assistant secretary

its registered office

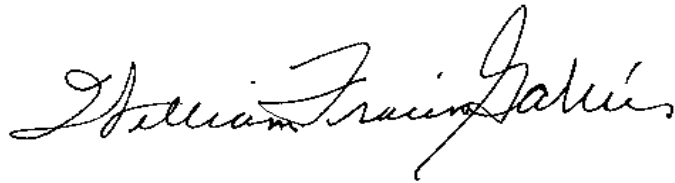
Signed this 9 Day of September, 2024 at 14:09 PM by the incorporator(s). (If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)

JIGAR PATEL

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:

September 09, 2024 12:34 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



WACHUSETT CANNABIS INC
3 CRAIG DR
CLINTON MA 01510-1341

Why did I receive this notice?

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

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

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

What if I have questions?

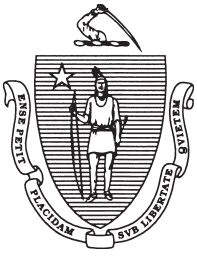
If you have questions, call us at (617) 887-6400, Monday through Friday, 9:00 a.m. to 4:00 p.m.

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



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

William Francis Galvin
Secretary of the
Commonwealth

Date: September 10, 2025

To Whom It May Concern :

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

WACHUSETT CANNABIS, INC.

is a domestic corporation organized on **September 09, 2024** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 25090215620

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

Processed by: mqc

BUSINESS PLAN

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This document and the information in it are provided in confidence, for the sole purpose of exploring business opportunities between Wachusett Cannabis, Inc., disclosing party, and the Town of Clinton and may not be disclosed to any third party or used for any other purpose without the express written permission of the disclosing party.

EXECUTIVE SUMMARY

1.1 Mission Statement

Wachusett Cannabis, Inc. (“**Wachusett Cannabis**”) is a Massachusetts business corporation that is committed to operating a compliant, safe, and high-quality Marijuana Retailer Establishment (“**MRE**”) in the Commonwealth of Massachusetts. Wachusett Cannabis seeks to establish itself as an industry leader through excellence in operational protocol, security systems, product quality, and community integration.

1.2 Product

Wachusett Cannabis will offer high-grade cannabis and extract products compliant with the guidelines and regulations set out by the Commission. In addition to traditional sativa, indica, and hybrid, and CBD cannabis flower, Wachusett Cannabis will offer a wide range of products that will allow Wachusett Cannabis to serve customers with a wide variety of needs and preferences. The products Wachusett Cannabis intends to offer include, but will not be limited to:

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

1.3 Customers

Wachusett Cannabis attract consumers who are 21 years of age or older, who reside and work in the Town of Clinton and surrounding communities in Worcester County. We anticipate bringing more business into the Town, from people who are seeking to purchase high-quality, affordable marijuana and marijuana products in a secure, professional, welcoming and conveniently located retail establishment.

1.4 What Drives Us

Wachusett Cannabis’ goals include providing safe and high-grade cannabis and extract products to eligible consumers above the age of 21. Wachusett Cannabis also strives to contribute to the local economy and community by providing jobs, organizing employee volunteer days and industry specific training classes to prospective employees.

2. COMPANY DESCRIPTION

2.1 Corporate and Application Status

Wachusett Cannabis is a Massachusetts business corporation in good standing that is applying for a license from the Massachusetts Cannabis Control Commission (the “**Commission**”) to operate an adult use Marijuana Retailer Establishment (“**MRE**”) in the Commonwealth.

Wachusett Cannabis will file, in a form and manner specified by the Commission, an application for licensure as a MRE consisting of three (3) packets: an Application of Intent packet; a Background Check packet; and a Management and Operations Profile packet, in addition to submission of the required fees.

2.2 Operations

Wachusett Cannabis has executed a lease agreement at 470 Main Street, Clinton, MA with the landlord for use as a Marijuana Retailer Establishment. 470 Main Street is an industrial mill building with the proposed unit already renovated to suit the operations of a retail cannabis facility as it was previously being occupied as.

Wachusett Cannabis’s facility will be designed with the specific intentions of ensuring consumer and client safety; promoting a smooth flow of business throughout the facility; eliminating queuing; and incorporating design nuance that is intended to facilitate one-on-one conversations between customer service representatives and customers. Wachusett Cannabis will meticulously invest in security, interior design, quality control, product testing, and staff training.

Wachusett Cannabis plans to obtain the marijuana flower and marijuana products to be sold at its Retailer Establishment from other licensed Marijuana Cultivator and Product Manufacturer Establishments in the Commonwealth.

2.3 Inventory Procedures

Wachusett Cannabis will establish inventory controls and procedures for reviewing comprehensive inventories of marijuana products; conduct a monthly inventory of finished, stored marijuana, stored marijuana; conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory.

Wachusett Cannabis will track all marijuana products using a seed-to-sale methodology in a form and manner approved by the Commission. Such procedures have a well-established track record in the industry of preventing internal diversion of products.

Wachusett Cannabis will maintain records which will be available for inspection by the Commission and host upon request. The records will be maintained in accordance with generally accepted accounting principles. Records will be maintained for at least 12 months.

Additional information on Wachusett Cannabis's inventory procedures are available in the Inventory Procedures document included with this submission.

2.4 Security

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

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

Interior and exterior HD video surveillance of all areas that contain marijuana, entrances, exits, and parking lots will be operational 24/7 and available to the Clinton 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 always be minimized to ensure clear visibility of the area.

Only Wachusett Cannabis's registered agents and other authorized visitors (e.g. contractors, vendors) will be allowed access to the facility, and a visitor log will be maintained in perpetuity. All agents and visitors will be required to visibly display an ID badge, and Wachusett Cannabis will maintain a current list of individuals with access.

On-site consumption of marijuana by Wachusett Cannabis's employees and visitors will be prohibited. Wachusett Cannabis will have security personnel on-site during business hours.

Additional information on Wachusett Cannabis's security plan is available in the Security Plan document included with this submission.

2.5 Benefits to the Town of Clinton

Wachusett Cannabis looks forward to working cooperatively with the Town of Clinton to ensure that Wachusett Cannabis operates as a responsible, contributing member of the local community. Wachusett Cannabis anticipates establishing a mutually beneficial relationship with the Town in exchange for permitting Wachusett Cannabis to site and operate. The Town stands to benefit in various ways, including but not limited to the following:

- a. **Jobs.** Wachusett Cannabis estimates adding at most 12 full-time and part-time jobs for qualified Clinton residents, in addition to hiring qualified, local contractors and vendors.
- b. **Access to Quality Legal Product for Consumers.** Wachusett Cannabis will ensure only qualified consumers ages 21 and over are able to purchase consistent, high-quality marijuana and marijuana products that are regulated and tested for cannabinoid content and contaminants. This will help to eliminate the current black market, in which consumers and patients are not required to verify their age and marijuana products are not tested.
- c. **Control.** In addition to the Commission, the Clinton Police Department and other municipal departments will have oversight over Wachusett Cannabis's security systems and processes in coordination with the General Manager and CEO.
- d. **Responsibility.** Wachusett Cannabis is comprised of experienced professionals who will be thoroughly background checked and vetted by the Commission.
- e. **Economic Development.** Wachusett Cannabis's project will revitalize the surrounding area and contribute to the overall economic development of the local community.

2.6 Zoning and Local Compliance

Wachusett Cannabis will always remain compliant with the local zoning requirements set forth in the Town of Clinton Zoning Ordinance. In accordance with the Zoning Ordinance, Wachusett Cannabis's proposed Marijuana Retail Establishment is located at 470 Main Street, Clinton, MA 01510. The proposed location was previously operating as a cannabis retail operation.

In compliance with 935 CMR 500.110(3) and the Town of Clinton Zoning Map, Wachusett Cannabis's proposed facility is not located within three hundred (300) feet of a public or private school providing education to children in kindergarten or grades 1 through 12.

Wachusett Cannabis will apply for any other local permits, approvals, registrations or certificates required to site and operate a Marijuana Retailer Establishment at the proposed location.

Wachusett Cannabis will comply with all conditions and standards set forth in any required local permit or approval.

Wachusett Cannabis will continue to work cooperatively with various municipal departments, boards, and officials to ensure that the establishment is compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

3. MARKET RESEARCH

3.1 Industry

Massachusetts presents a dynamic and growing cannabis market, characterized by a consistent upward trajectory in both sales and consumer demand. As of November 2024, the state recorded

total cannabis sales amounting to \$133.35 million, reflecting a modest year-over-year growth of 3.7%. This growth is supported by a significant increase in unit sales, which saw a 21.9% rise compared to the previous year, indicating a robust expansion in the consumer base and consumption volume. The average item price in Massachusetts has seen a slight decrease from \$18.97 in October 2024 to \$18.57 in November 2024, suggesting a market adjustment that could be influencing the purchasing patterns.

Despite a slight month-over-month sales decline of 2.1%, the market's resilience is evident from the annual growth figures. The pricing trends and sales dynamics suggest that [Massachusetts](#) is adapting to both market maturation and evolving consumer preferences, which could be a result of increased competition and improved production efficiencies within the state. (Headset, 2024).

3.2 Customers

The Town of Clinton's population is approximately 15,500, with the population of entire Worcester County being approximately 860,000.

Wachusett Cannabis's target customers are consumers 21 years of age or older who live in, work in and visit the Town of Clinton and the surrounding communities in Middlesex County and who are seeking to purchase high-quality marijuana and marijuana products in a secure, professional, welcoming and conveniently located retail establishment.

3.3 Competitors

Wachusett Cannabis's main competitors will include other licensed Adult-Use Retailer Establishments in the Town of Clinton, specifically New England Harvest. But, maintaining a healthy competition with all the emerging competition is always within our best interests. Also, we intend to fully cooperate in a professional, and communicative manner with our: competition, Town's Law Enforcement, and the CCC; all whom will be informed to help solve concerns or issues about customer and business safety when in doubt or in any alerted matter - where their acknowledgement or involvement is required. It is our priority to stay in touch with our neighbors and the other cannabis businesses to keep track of illicit and alarming activity. It's also in our interest to stay updated on how many more Marijuana Retail Establishment Clinton will consider allowing in future. We have and will remain at our best awareness to understand the scope of the industry as it continues to evolve as the market matures.

3.4 Competitive Advantage

Our competitive advantage starts with our location. We stand out from the crowd as we've secured a retail location visible to the main road. Our goal is to maximize our customer intake for the growth and financial stability of our business. With the area redeveloping and Jack's Mill coming to fruition, we find it is only natural to fill the gap of the Town's 2nd cannabis retail license in the same location it former was.

From start-up to operational, the founder's vision to fill the gaps in the market from studying and experiencing the medical cannabis industry and continuing to research the recreational market is

giving us insight on what types of products consumers are asking for. There is a need for affordable cannabis products, that are safer to use from hardware to ingredients in the end products, we're committed to provide a mindful cannabis experience.

4. PRODUCT / SERVICE

4.1 Products

Wachusett Cannabis intends to offer a variety of marijuana strains, concentrates and infused products to meet the wide-ranging needs and preferences of its customer base. The products available for purchase will include, but will not be limited to:

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

4.2 Dispensary Procedures

In accordance with 935 CMR 500.140(3), access to Wachusett Cannabis's establishment will be limited to verified individuals 21 years of age and older. Immediately after entering the dispensary, a customer would be in the waiting room and must present a valid, government-issued photo identification through a pass-through window to a Wachusett Cannabis security agent who will be located in the security booth. The Wachusett Cannabis security agent will then determine whether the customer is 21 years of age or older. Once the customer's identity and age are verified through our Advance ID detection system, the security agent will permit the customer to enter the establishment's sales area.

Once inside the sales area, the customer will be called over to receive individualized service from a Wachusett Cannabis agent who will help the customer select from the available products to complete the transaction. Prior to checkout, customers will be required to confirm their identities and ages a second time. The checkout also activates the seed-to-sale tracking system that will be compliant with 935 CMR 500.105(8). Sales will be limited to one (1) ounce of marijuana flower or five (5) grams of marijuana concentrate per adult-use consumer visit. All required taxes will be collected at the point of sale. The benefit of using our Advanced ID detection system, is that it will retain a copy of the driver's license and when it was last scanned which will prevent customers from buying over their allotment a day, and will detect multiple entries.

Once a customer has selected products for purchase, a Wachusett Cannabis agent will collect the requested items from the secure product storage area. The agent will then scan each product's barcode into the Commission-approved point of sale system. All products will be packaged in tamper and child-resistant, resealable packaging that is compliant with 935 CMR 500.105(5) and properly labeled with warnings, strain information, cannabinoid profile, and other information detailed in 935 CMR 500.105. For products that are not readily stored in the secure product storage area behind the counter – our POS system will be capable of sending back the order for fulfillment by an Agent in the stock room.

In the event a Wachusett Cannabis agent determines a consumer would place themselves or the public at risk, the agent will refuse to sell any marijuana products to the consumer.

Otherwise, for normal transactions, Wachusett Cannabis will use the point of sale system to accept payment and complete the sale. The system will back up and securely cache each sale for inspection.

In compliance with 935 CMR 5001.140(8), Wachusett Cannabis will provide educational materials designed to help consumers make informed marijuana product purchases. The educational materials will describe the various types of products available, as well as the types and methods of responsible consumption. The materials will offer education on titration, which is the method of using the smallest amount of products necessary to achieve the desired effect. Additional topics discussed in the education materials will include potency, proper dosing, the delayed effects of edible marijuana products, substance abuse and related treatment programs, and marijuana tolerance, dependence, and withdrawal.

Additional information on Wachusett Cannabis's retail policies and procedures is available in the Dispensing Procedures document included with this submission.

4.3 Pricing Structure

When determining the appropriate pricing structure, Wachusett Cannabis will continually strive to find the perfect balance between affordability for consumers and preventing the diversion of product to the black market.

5. MARKETING & SALES

5.1 Growth Strategy

Wachusett Cannabis's 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 highly trained, consummate professionals

Wachusett Cannabis plans to seek additional, appropriate locations in the Commonwealth to expand business and reach an increased number of customers in the future.

5.2 Communication

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

All marketing, advertising, and branding produced by or on behalf of Wachusett Cannabis will include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½)(xxvi): “This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA.”

Wachusett Cannabis will communicate with customers through:

1. A company run website;
2. A company blog;
3. Popular online menu platforms such as Dutchie;
4. Popular social media platforms such as Instagram;
5. Opt-in direct communications; and
6. Partnership with local businesses.

Wachusett Cannabis 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.

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

5.3 Product Packaging

Wachusett Cannabis 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.” Wachusett Cannabis will not sell multiple serving beverages and each single serving of an edible marijuana product contained in a multiple-serving package will be marked, stamped, or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product. At no point will an individual serving size of any marijuana product contain more than five (5) milligrams of delta-nine tetrahydrocannabinol.

5.4 Branding and Logos

Wachusett Cannabis will develop logos and branding that complies with state regulations and that will distinguish Wachusett Cannabis from its competitors. Wachusett Cannabis will file for trademark protection at the state level, and when permissible, at the federal level.

Samples of the logos are still in development.

6. FINANCIAL SUMMARY

Wachusett Cannabis is planning to hold a capital funding raise after receiving a Provisional License from the CCC. Given the founder’s experiences and background in entrepreneurial, financial, medical, and cannabis industries, we are confident to hold a successful raise for the start-up of our proposed business. Investors will be fully aware of our operational plan to establish a compliant retail operation in a timely manner. The company’s proposed facility in Clinton is an existing structure that will require between \$250,000 and \$500,000 in capital investment based on overall estimates. Thus, we have gathered the required resources to execute a proper raise and plan to handle it strategically.

6.1 Financial Projections

Wachusett Cannabis, Inc.						
Financial Projections						
470 Main Street, Clinton, MA 02143						
Item		2025	2026	2027	2028	2029
Revenue						
Gross Sales		\$ 3,375,000	\$ 4,800,000	\$ 4,200,000	\$ 3,600,000	\$ 3,360,000
Cost of Goods		\$ 1,687,500	\$ 2,400,000	\$ 2,100,000	\$ 1,800,000	\$ 1,680,000
Gross Profit		\$ 1,687,500	\$ 2,400,000	\$ 2,100,000	\$ 1,800,000	\$ 1,680,000
Expenses						
Labor		\$ 350,000	\$ 360,500	\$ 371,315	\$ 382,454	\$ 393,928
Security labor		\$ 100,000	\$ 103,000	\$ 106,090	\$ 109,273	\$ 112,551
Labor taxes		\$ 49,500	\$ 49,500	\$ 49,500	\$ 49,500	\$ 49,500
Rent		\$ 50,000	\$ 27,600	\$ 28,800	\$ 28,800	\$ 28,800
Property Taxes		\$ 2,902	\$ 2902	\$ 2,902	\$ 2,902	\$ 2,902
Utility		\$ 600	\$ 618	\$ 637	\$ 656	\$ 675
Security monitoring		\$ 1,800	\$ 1,854	\$ 1,910	\$ 1,967	\$ 2,026
Accounting		\$ 9,000	\$ 9,270	\$ 9,548	\$ 9,835	\$ 10,130
Legal compliance		\$ 12,000	\$ 12,360	\$ 12,731	\$ 13,113	\$ 13,506
Phone/Internet		\$ 1,500	\$ 1,545	\$ 1,591	\$ 1,639	\$ 1,688
Local taxes		\$ 101,250	\$ 104,288	\$ 107,416	\$ 110,639	\$ 113,958
Charitable Contributions		\$ 50,000	\$ 51,500	\$ 53,045	\$ 54,636	\$ 56,275
Other		\$ 20,000	\$ 20,600	\$ 21,218	\$ 21,855	\$ 22,510
IRC 280E tax on deductions		\$ 267,278	\$ 275,296	\$ 283,555	\$ 292,061	\$ 300,823
Total Expenses		\$ 954,185	\$ 981,647	\$ 1,009,896	\$ 1,039,197	\$ 1,069,406
Earnings before income tax		\$ 733,315	\$ 1,418,353	\$ 1,090,104	\$ 760,803	\$ 610,594
Total Lbs of cannabis Sold						
		750	1200	1200	1200	1200
Average retail price per LB						
		\$ 4,500	\$ 4,000	\$ 3,500	\$ 3,000	\$ 2,800

7. TEAM

7.1 General

Wachusett Cannabis has assembled a team of experienced professionals with a diverse set of talents and skills to operate a Marijuana Retailer Establishment.

7.1 Executive Management Team

7.1.1 Jigar Patel, *Founder, Chief Executive Officer*

Jigar Patel received his Bachelor of Science in Business Administration concentration in Marketing and Entrepreneurship from the University of Massachusetts, Lowell. He has a range of experience in the development of startup businesses by introducing new products and services into their respective markets. He was introduced to the MA cannabis industry in 2017 by becoming a medical cannabis patient advocate. There he explored topics such as: cannabinoids, various components of the plant, methods of titration, effects and side-effects of medicines, dosing, and overall mindful consumption. He further graduated in Innovation and Emerging Technologies through the Starting a New Venture Program, Master of Science in Entrepreneurship at UMass Lowell. From there, he established Vedi Naturals LLC, dba koša, a cannabis retail establishment in Marlborough, MA. Now, he's driven to continue promoting cannabis healing by pursuing his entrepreneurial journey through this proposed retail marijuana venture.

7.1.2 Shea Merson, *General Manager*

Shea Merson is a local Clintonian, who served as an operations manager at CVS Health for 10 years. He is fond of the benefits of cannabis usage and how it helps all walks of life find relief. He is an outgoing and mindful team member who is excited to bring his retail experience in sale forecasting, inventory management, loss prevention, and pharmacy compliance, to the cannabis industry. Shea has a great vision to bring more variety and affordable cannabis to Clinton and the surrounding community.

8. CONCLUSION

Wachusett Cannabis intends to efficiently serve customers and patients with high quality, consistent, laboratory-tested marijuana and marijuana products in Clinton and the surrounding communities in Worcester County.

Wachusett Cannabis is well-funded and well-positioned in the Massachusetts market and will contribute to the growth of the industry through a highly experienced team of successful operators working under an established framework of high quality standard operating procedures, research and development plans, and growth strategies. In doing so, Wachusett

Cannabis looks forward to working cooperatively with the Town of Clinton to help spread the benefits this market will yield.

PLAN FOR OBTAINING LIABILITY INSURANCE

Wachusett Cannabis, Inc. (“Wachusett Cannabis”) plans to contract with Admiral Insurance Company to maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually and product liability coverage for no less than \$1,000,000 per occurrence & \$2,000,000 in aggregate annually. The policy deductible will be no higher than \$5,000 per occurrence. Wachusett Cannabis will consider additional coverage based on availability & cost-benefit analysis. If adequate coverage is unavailable at a reasonable rate, Wachusett Cannabis will place in escrow at least \$250,000 to be expended for liabilities coverage. Any withdrawal from such escrow will be replenished within 10 business days. Wachusett Cannabis will keep reports documenting compliance with 935 CMR 500.105(10).

PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

Pursuant to 935 CMR 500.050(8)(b), Wachusett Cannabis, Inc. (“Wachusett Cannabis”) will only be accessible to individuals, visitors, and agents who are 21 years of age or older with a verified and valid government-issued photo ID. Upon entry into the premises of the marijuana establishment by an individual, visitor, or agent, a Wachusett Cannabis 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 Wachusett Cannabis discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1)(m). Wachusett Cannabis will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors in the Commonwealth or a like violation of the laws in other jurisdictions, pursuant to 935 CMR 500.030(1).

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

QUALITY CONTROL AND TESTING

Quality Control

Wachusett Cannabis Inc. (“Wachusett Cannabis”) will comply with the following sanitary requirements:

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

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

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

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

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

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

Testing

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

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

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

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

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

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

Wachusett Cannabis 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. Wachusett Cannabis acknowledges and understands that testing results will be valid for a period of one year, and that marijuana or marijuana products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of Wachusett

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

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

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

Quality Control Samples

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

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

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

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

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

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

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

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Overview

Wachusett Cannabis, Inc. (“Wachusett Cannabis”) will securely maintain personnel records, including registration status and background check records. Wachusett Cannabis will keep, at a minimum, the following personnel records:

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

Agent Personnel Records

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

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

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

Agent Background Checks

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

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

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

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

Personnel Policies and Training

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

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

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

RECORDKEEPING PROCEDURES

General Overview

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

Recordkeeping

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

- Corporate Records

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

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

- Business Records

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

- Assets and liabilities;
- Monetary transactions;
- Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;

- Sales records including the quantity, form, and cost of marijuana products;

MAINTAINING OF FINANCIAL RECORDS

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

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
 - Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products; and
 - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Wachusett Cannabis.
- All sales recording requirements under 935 CMR 500.140(5) are followed, including:
 - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
 - Prohibiting the use of software or other methods to manipulate or alter sales data;
 - Conducting a monthly analysis of its equipment and sales data, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
 - If Wachusett Cannabis determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data: 1. it shall immediately disclose the information to the Commission; 2. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and 3. take such other action directed by the Commission to comply with 935 CMR 500.105.
 - Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
 - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales; and
 - Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.
- Additional written business records will be kept, including, but not limited to, records of:
 - Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
 - Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
 - Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission's regulations.

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

Statement of Purpose

Wachusett Cannabis Inc. (“Wachusett Cannabis”) is committed to promoting equity in its Marijuana Establishment located in the Commonwealth of Massachusetts. Through this commitment, Wachusett Cannabis seeks to adopt diversity goals and programs that allow for meaningful participation of women, minorities, veterans, people with disabilities, and people who identify as LGBTQ+ at Wachusett Cannabis.

Goals

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

- Hiring such that Wachusett Cannabis’s staff is comprised of at least the following:
 - 30% women;
 - 20% people of color; particularly Black, African American, Hispanic, Latinx, and Indigenous people;
 - 5% LGBTQ+;
 - 5% veterans; and
 - 5% people with disabilities.
- Implementing an annual training program for all employees regarding diversity, equity, and inclusion principles; and
- Creating an inclusive work environment such that Wachusett Cannabis has no less than an 85% employee satisfaction rate with its DEI initiatives and outcomes.

Programs

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

- Engaging in equitable hiring efforts by ensuring that jobs are posted (as they become available, but not less than annually) with publications and job resource websites focused on diversity hiring including Blackjobs.com, United Latino Job Bank, LatPro.com, Black Career Network, HBCU Connect, Asian Hires, NAAAP Career Center, iHispano, Diversity Inc., and Diversity Job Board.
- Requiring that each employee complete DEI training (upon hire and each year thereafter). Topics covered during such training will include unconscious bias in the workplace. These trainings will become a part of each employee’s personnel file.
- Surveying employees no less than annually to assess its inclusivity and seek areas for improvement and conducting exit interviews to receive feedback on its diversity and



inclusivity efforts. Wachusett Cannabis will use these employee surveys and exit interviews to further inform adjustments to its diversity and inclusivity efforts.

Measurements

The Executive Management Team will administer the Plan and will be responsible for developing measurable outcomes to ensure Wachusett Cannabis continues to meet its commitments. Such measurable outcomes, in accordance with Wachusett Cannabis's goals and programs described above, include:

- Completing voluntary employee surveys that evidence Wachusett Cannabis's employee demographics;
- Documenting any job advertisements placed with publications and job resource websites focused on diversity hiring;
- Evidencing all employee trainings on DEI concepts and initiatives; and
- Documenting all surveys and exit interviews of staff with respect to Wachusett Cannabis's diversity and inclusivity efforts.

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

Acknowledgements

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

QUALIFICATIONS AND TRAINING

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

Qualifications

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

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

Training

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

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

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

Basic Core Curriculum

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

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

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

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

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





Energy Compliance Plan Efficiency & Conservation Policy

WCI will demonstrate consideration of the following factors:

Identification of potential energy use reduction opportunities (such as natural lighting 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 the site, and an explanation of why the identified opportunities were not pursued, if applicable. Strategize 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, § 2 1, or through municipal lighting plants.

To the extent that updates are required to the information provided for initial licensure, WCI will submit an updated energy compliance letter prepared by a Massachusetts Licensed Professional Engineer or Massachusetts Licensed Registered Architect with supporting documentation, together with a renewal application submitted under 935 CMR 500.103 (4) and 935 CMR 501.10 3 (4). WCI will use additional best management practices as determined by the Commission, in consultation with the working group established under St. 2017, c. 55, § 78 (b), to reduce energy and water usage, engage in energy conservation and mitigation of other environmental impacts, and will provide energy and water usage reporting to the Commission in a form determined by the Commission. Each license renewal application under 935 CMR 500 .10 3(4) will include a report on WCI's energy and water usage over the twelve months before the date of application.

WCI has identified energy reduction opportunities, including natural lighting energy energy-efficient measures. Our facility has been fully designed with features including LED lighting for all fixtures, including shelving and millwork. WCI has identified opportunities for renewable energy generation. Our team is dedicated to consistently striving for sustainability and emission reduction.

WCI has strategies in place to reduce the electrical demand. Light schedules are in place to turn off all lights except a few interior fixtures during non-operational hours to reduce electricity usage. WCI will document renewable or alternative energy credits that represent a portion of the energy usage not generated onsite, which has been purchased and retired yearly. The Commission may further define the standards, or create reasonable exemptions or modifications, through guidelines issued in consultation with the energy and environmental standards working group established under St. 20 17, c. 55, § 78 (b). WCI will regularly check such guidelines and continue to follow the Commission's standards.

PRODUCT MANUFACTURING SAFETY PLAN

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

Agent Hygiene Practices

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

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

Food Material Practices

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

Food Contact Surface Sanitation Practices

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

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

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

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

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

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

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

Training

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

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

Cleanliness & Sanitation Training:

Wachusett Cannabis will combine its existing successful agent training program, supplemented with Commission rules and cannabis specific training to provide exhaustive training curricula to all agents. Wachusett Cannabis's training will include USDA Good Handling Practices and Quality Systems, FDA Current Good Manufacturing Practices, and sickness or illness policies. Agents who handle cannabis will receive hygiene training with specific attention to preventing

microbial contamination. All employees will receive, at a minimum, the following quality assurance and contamination prevention training:

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

Wachusett Cannabis Lab and Production Agent Health and Safety Program

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

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

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

When selling or otherwise transferring marijuana to another marijuana establishment Wachusett Cannabis will provide documentation of its compliance with the testing requirements of 935 CMR 500.160: *Testing of Marijuana and Marijuana Products*, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect

marijuana products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.

WORKPLACE SAFETY PROCEDURES

Wachusett Cannabis has developed 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

1. Each employee must comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to 29 U.S.C. § 651, et seq., which are applicable to the employee's own actions and conduct. All current and updated regulations and references at 29 CFR Parts 1903, 1904, 1910, 1915, 1917, 1918, 1926, 1928 and 1977 are incorporated by reference, and applicable to all places of employment covered by 935 CMR 500.000. All current and updated regulations and references at 29 CFR Parts 1903, 1904, 1910, 1915, 1917, 1918, 1926, 1928, and 1977 are incorporated by reference.
2. OSHA Standards that may be applicable are:
 - a. 1904 Recording and reporting occupational injuries and illnesses
 - b. 1910.36 Design and construction requirements for exit routes
 - c. 1910.38 Emergency action plans
 - d. 1910.39 Fire prevention plans
 - e. 1910.94 Ventilation
 - f. 1910.95 Occupational noise exposure
 - g. 1910.101 Compressed gases
 - h. 1910.106 Flammable Liquids
 - i. 1910.120 Hazardous waste operations and emergency response
 - j. 1910.132 Personal protective equipment: general requirements
 - k. 1910.133 Eye and face protection
 - l. 1910.134 Respiratory protection
 - m. 1910.135 Head protection
 - n. 1910.136 Foot protection
 - o. 1910.137 Electrical protective equipment
 - p. 1910.138 Hand protection
 - q. 1910.141 Sanitation
 - r. 1910.147 The control of hazardous energy (lockout/tagout)
 - s. 1910.151 Medical services and first aid
 - t. 1910.157 Portable fire extinguishers
 - u. 1910.159 Automatic sprinkler systems
 - v. 1910.165 Employee alarm systems
 - w. 1910.212 Machinery and machine guarding
 - x. 1910.242 Hand and portable powered tools and equipment
 - y. 1910.263 Bakery equipment
 - z. 1910.303 General design standards for electrical systems
 - aa. 1910.335 Safeguards for personnel protection and electrical systems
 - bb. 1910.1000 Table Z-1 Table Z-1 Limits for Air Contaminants

HAZARD COMMUNICATIONS PLAN

1. Wachusett Cannabis' Hazard Communication policies and procedures shall ensure Wachusett Cannabis is compliant with applicable OSHA requirements and all applicable state and local laws, regulations, ordinances, and other requirements.
2. All levels of supervision will be held accountable for the safety of those employees under their direction.
3. Copies of Wachusett Cannabis' Hazard Communication policies and procedures shall be given to all employees and be available for all to review, upon request.
4. Wachusett Cannabis' Hazard Communication policies and procedures shall, at a minimum, address the following:
 - a. Informing employees of hazardous chemicals used at Wachusett Cannabis.
 - b. Use of labels and other forms of warning. Use of Material Safety Data Sheets (MSDS).
 - c. Procedure with respect to hazardous non-routine tasks.
 - d. Maintaining a list of known hazardous chemicals used by employees and independent contractors.
 - e. Communication of hazards.
 - f. Training of employees and independent contractors.
5. Wachusett Cannabis Facility Manager will maintain, review, and update the Hazard Communication policies and procedures and be responsible for:
 - a. Implementation of Wachusett Cannabis' Hazard Communication policies and procedures.
 - b. Ensure that OSHA records are maintained at all times.
 - c. Train all Wachusett Cannabis employees and visiting independent contractors.
 - d. Provide documentation of all training and communications to the Human Resources Manager.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

1. Wachusett Cannabis' personal protective equipment (PPE) policies and procedures have been developed to identify work situations that require the use of PPE and to determine the proper selection and use of PPE.
2. PPE will be selected and used to protect employees from the hazards and potential hazards that they are likely to encounter.
3. Employees will wear appropriate PPE at all times.
4. All managers, will implement all aspects of Wachusett Cannabis' PPE policies and procedures, including:
 - a. Understanding of the applicable federal, state and local laws, regulations, ordinances, and other requirements, as well as best practice safety standards.
 - b. Reviewing hazard assessments to determine the need for PPE.
 - c. Acquiring the correct PPE.
 - d. Training employees on the use of PPE.
 - e. In coordination with the Human Resources Manager, documenting and maintaining employee PPE training.

- f. Ensuring PPE is available, provided and documented.
- g. Conducting hazard specific training for the use of PPE.
- h. Establishing inspections, maintenance and replacement procedures to make sure damaged PPE is not used.

All Managers will:

1. Ensure all employees wear the appropriate PPE.
2. Ensure that all employees have completed PPE training.
3. Contact the Chief Operating Officer when a hazard or process has changed which may render previously used PPE ineffective.
4. Comply with PPE policies as required and support the PPE program as necessary.
5. Participate in quarterly training for the use and maintenance of PPE.
6. Replace all damaged PPE.

Employees will:

1. Inspect PPE before use and ensure proper maintenance.
2. Wear all assigned PPE and conduct assigned tasks in a safe manner.
3. Notify a manager when PPE is damaged and needs to be replaced.
4. Participate in quarterly training for the use and maintenance of PPE.
5. Comply with PPE policies as required and support the PPE program as necessary.

ASSESSMENT

1. For each hazard identified during the hazard assessment, PPE will be selected to protect the employee by creating a barrier against the workplace hazard.
2. PPE will be selected to protect against any hazard that is present or likely to be present.
3. PPE selections will be compliant with all applicable federal (excepting federal laws related to marijuana), state and local laws, regulations, ordinances, and other requirements.
4. All managers will choose PPE based on characteristics such as design, reliability, and suitability for the hazardous task.
5. Managers will ensure the PPE selected offers a level of protection greater than the minimum required to protect employees from the identified hazards.
6. Upgraded PPE will be immediately provided if any change in facility status results in dangerous exposures to employees.

FIRE PROTECTION PLAN

1. All Wachusett Cannabis employees, supervisors, and managers are expected to follow the procedures outlined in this plan to ensure that employees and consumers are protected.
2. The Facility Manager is responsible for the control of accumulation of flammable or combustible waste materials.
3. In addition, the Facility Manager is responsible for maintenance of equipment and systems installed to prevent or control ignitions of fires (ex. Fire Extinguishers, fire hoses, etc.)
4. All Wachusett Cannabis agents will be trained on and are responsible for understanding the following Safe Code of Work Practices:

- a. Flammables, including datasheets, books, rags, clothing, flammable liquids or trash shall not be placed or stored near heaters or their vents, any electrical appliance, or other potential sources of ignition.
 - b. Sources of actual or potential heat such as hot plates or electric coffee pots shall not be placed near flammable materials. Portable space heaters and candles are prohibited.
 - c. Care must be taken not to block potential escape routes, particularly with flammable materials.
 - d. Each individual is personally responsible for assuring that extension cords and multiple plugs are in good condition. Cords that are missing the grounding prong, are spliced together, or that are missing their protective sheath shall not be used.
5. Additionally, fire control measures installed or available in work areas include installed and monitored sprinkler systems, fire extinguishers and fire alarms systems.
 6. The Facility will have Fire Extinguishers throughout the facility.

EMERGENCY ACTION PLAN

1. Wachusett Cannabis' emergency action plan serves to outline procedures for handling of emergency situations.
2. These protocols ensure the safety of all personnel in an emergency situation.
3. The Compliance Officer will oversee policy compliance for personnel under his or her supervision. Facility managers are responsible for oversight of all the employees and all emergency procedures.
4. All Wachusett Cannabis employees will adhere to the policies and SOPs in this manual.
5. All employees will have proper training in emergency preparedness as a condition of employment.

RESPONSE TO A MEDICAL EMERGENCY

Medical problems may range from minor, isolated events such as a fall down the stairs to the significant events involving many people. All employees will be trained in the following responses to medical emergencies:

- They should assess the situation.
- If the person is conscious, Agents should ask him or her to tell them if anything hurts. If unconscious, Agents should gently inspect the person for obvious signs of injury.
- Agents should not move the person (especially if he or she indicates any pain) unless Agents are in imminent danger of further injury, e.g., an approaching fire.
- Agents should ask someone else to call 911 if Agents are helping an injured person.
- Agents should also call the manager if he or she is not present and inform them of the situation, the location, etc.
- Agents may render first aid if Agents are knowledgeable and willing, but if possible should wait for qualified personnel to deliver medical attention.
- Agents should ask someone else to recover the first aid kit to utilize during the emergency and avoid coming in contact with blood, vomit, or other bodily fluids without the use of rubber gloves.
- Agents should not provide or administer any medicines and defer to emergency personnel

once Agents arrive.

- Agents should limit their conversation with the person to reassurances and not discuss their injury, the accident, or what circumstances might have contributed to its cause, if possible.
- After the person has been given first aid and the incident is over, Agents should provide police or other emergency personnel with any details that Agents know.
- After the medical emergency is over, the injured person, witness, and/or supervisor should formally document the incident and maintain a record of it.

RESPONSE TO A FIRE EMERGENCY

- Activate nearest fire alarm (if installed)
- Notify the local fire department by calling 911
- If no fire alarm is available notify on-site personnel via:
 - Voice communication
 - Phone paging
 - Radio
- Fight the fire ONLY if:
 - The fire department has been notified
 - The fire is small and not spreading to other areas
 - Escaping the area is possible by backing up to the nearest exit
 - The fire extinguisher is in working condition and personnel are trained to use it
- Upon being notified of a fire emergency, occupants must:
 - Leave the building using designated escape routes
 - Assemble in the designated area
 - Remain outside until the competent authority (Designated Official or designee) announces that it is safe to re-enter.
- The Compliance Officer shall designate employees as emergency responders who shall:
 - Disconnect utilities and equipment unless doing so jeopardizes his/her safety
 - Coordinate an orderly evacuation of personnel
 - Perform an accurate headcount of personnel reported to the designated area
 - Determine a rescue method to locate missing personnel
 - Provide fire department personnel with the necessary information about the facility

EXTENDED POWER LOSS

In the event of an extended power loss to this facility, precautionary measures should be taken including but not limited to:

- Unnecessary electrical equipment and instruments should be turned off if power restoration causes a surge that could damage electronics and sensitive equipment.

If the power loss causes freezing temperatures within the building the following measures should be taken:

- Emergency eyewash station should be drained of water to avoid freezing and cracking of pipes.
- Equipment that contains fluids that can freeze due to long-term exposure should

be drained of all such fluids.

- Propylene-glycol may be added to drains to prevent traps from freezing.

Upon restoration of power (and heat):

- Electronic equipment should be brought up to ambient temperatures before energizing to prevent condensate from forming in circuitry.
- Water pipes should be checked for leaks after heat has been restored to prevent flooding.

BOMB THREAT

In the event of a bomb threat made in person or over the phone:

- Be calm and listen,
- Do not interrupt the caller,
- Record your name, time, and date,
- Record the following about the caller's identity:
 - Sex (Male or female)
 - Adult or juvenile
 - Origin of call (local, long distance, telephone booth):
 - Voice characteristics: loud/soft, high pitch/deep, raspy/pleasant, intoxicated, other
 - Accent: local/not local, foreign/regional, race
 - Speech: fast/slow, distinct/distorted, stutter/slurred/nasal
 - Manner: calm/angry, rational/irrational, coherent/incoherent, deliberate/emotional, righteous/laughing
 - Language: excellent, good, fair, poor, foul
 - Background noises: factory, trains, machines, animals, music, quiet, office, voices, airplanes, street, party, traffic, atmosphere
- If told, record all the following facts:
 - When will it go off
 - Where is it located
 - What kind of bomb
 - What kind of package
- While on the phone or handling the person deploy the silent alarm button nearest your position.
- If the threat is made by phone, signal personnel to evacuate the facility immediately.
- As soon as possible call 911 and all company emergency contacts.

FLOOD

- Stay calm and await instructions from designate emergency personnel or first responders.
- Shut down all utilities and equipment if it is safe to do so.
- Follow the recommended primary or secondary evacuation routes.

BLIZZARD

- Stay calm and await instructions from designate emergency personnel or first responders.

- Stay indoors.
- If there is no heat:
 - Close off unneeded rooms or areas
 - Stuff towels or rags in cracks under doors
 - Cover windows
 - Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.
 - Wear layers of loose-fitting, lightweight warm clothing, if available.

ARMED ROBBERY

All employees will be trained on how to respond to an armed robbery. Agents will receive initial training as a component of onboarding, re-fresher training annually and as needed throughout the year:

- 1) If a firearm is displayed, Agents should assume it is real and loaded.
- 2) Agents should not do anything that would jeopardize their safety or the safety of others.
- 3) Agents should remain calm and not make any sudden moves. If Agents must put their hands into a pocket or make any other moves, explain the action before doing it. If the robber(s) have a weapon, they will likely use it if provoked.
- 4) Agents should activate alarms ONLY if Agents can do so safely and without detection.
- 5) Agents should follow the directions of the robber(s), but not volunteer to anything more than asked.
- 6) If the robber hands them a note, Agents should drop it on the floor or place it out of sight to retain as evidence.
- 7) Agents should study the robber(s) as carefully as possible without being obvious, noting height, weight, race, age, clothing, jewelry, sex, speech characteristics, scars, tattoos, physical characteristics, gait, and method of operation.
- 8) Agents should note the number of accomplices and where they stood, paying special attention to the way the robbers address each other because under stress, they may use real names.
- 9) Agents should note the type of weapon used by the robber and where he or she carried it.
- 10) Agents should note the direction in which the robber(s) departed and how they carried the money or cannabis away (sack, bank bag, etc.).
- 11) Agents should try to remember exactly what the robber(s) said.
- 12) Agents should prioritize their safety and the safety of others because money or cannabis can be recovered or replaced but a life cannot.

After an armed robbery, any employee can call 911 to report the robbery and provide their name and location. Agents should not leave the phone until they have answered all of the operator's questions. If injury occurred, Agents should advise the police if an ambulance is needed. The person who actually dealt with the robber(s) should be near the person designated to telephone the police to assist in answering any questions.

As soon as the robbery has been reported to the police, the employees should lock all doors, ask all witnesses to remain, and allow no one to enter until officers arrive. Agents should not touch anything. All persons who dealt with the robber or were present during the robbery should

immediately begin writing all they can remember of the incident but not discuss the robbery with anyone until after Agents have given their information to the police.

ACTIVE SHOOTER

The U.S. Department of Homeland Security defines an active shooter as “an individual actively engaged in shooting or attempting to shoot people in a confined and populated area.” Wachusett Cannabis will teach all employees the DHS-recommended procedures of Run.Hide.Fight. if they find themselves in an area with an active shooter:

- 1) **Evacuate (RUN)**: If employees are in the building where an active shooter is present, they should look and listen for indications of where the threat is. If they see people fleeing from a particular area, they know that the threat is in that area and could be coming toward them. They can try to evacuate the building if the nearest route is away from the active shooter or move to a room that can be locked (safe room). If they cannot evacuate or move to a safe room, they should move away from the threat and away from the noise and commotion.
- 2) **Lockdown and Shelter-in-Place (HIDE)**: If they cannot safely evacuate the area, the best option is for the employees to find a room with a door that locks from the inside. If the door does not lock, they should barricade it with large heavy objects such as desks, tables, file cabinets, furniture, and books to make entry as difficult as possible. They should locate an area with ballistic cover, not just visual concealment, because cover stops and slows bullets while concealment does not. If for some reason the employees are caught in an open area such as a hallway or reception area, they can try to hide, remain as quiet and calm as possible, or “play dead” to avoid detection. Employees should also:
 - Cover windows and draw blinds
 - Turn off radios and computer monitors
 - Keep out of sight
 - Silence cell phones and remain as quiet as possible
- 3) **Confront the Shooter (FIGHT)**: If the employees come face to face with the assailant, as a last resort and because no single procedure can be recommended in this situation, they should attempt to quickly overpower the individual with force in the most violent manner possible. If the employees are with other people they should work as a collective group to overcome the shooter by yelling “Gun!”, throwing items at the shooter’s head to distract him or her, grabbing the weapon, or holding the shooter for police. They should remember that in most cases, the attacker will continue to shoot victims unless he or she is stopped.

RECORDKEEPING PROCEDURES

General Overview

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

Recordkeeping

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

- Corporate Records

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

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

- Business Records

Business Records require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include the following financial records, which will be maintained in accordance with generally accepted accounting principles, as applicable:

- 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 Wachusett Cannabis.
- Personnel Records

At a minimum, Personnel Records will include:

 - Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
 - A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with Wachusett Cannabis and will include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - Documentation of verification of references;
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - Documentation of periodic performance evaluations; and
 - A record of any disciplinary action taken.
 - Notice of completed responsible vendor and eight-hour related duty training.
 - A staffing plan that will demonstrate accessible business hours and safe operating conditions;
 - Personnel policies and procedures, which will include, at a minimum, the following:
 - Code of ethics;
 - Whistle-blower policy; and
 - A policy which notifies persons with disabilities of their rights under <https://www.mass.gov/service-details/about-employment-rights> or a comparable link, and includes provisions prohibiting discrimination and providing reasonable accommodations.
 - 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
 - Wachusett Cannabis will maintain the results of all testing for a minimum of one (1) year.
- Inventory Records

- The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Seed-to-Sale Tracking Records
 - Wachusett Cannabis will use Metrc as the seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(e), including, at a minimum, marijuana ready for processing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
- Incident Reporting Records
 - Within ten (10) calendar days, Wachusett Cannabis will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident .
 - All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by Wachusett Cannabis for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within Wachusett Cannabis's jurisdiction on request.
- Visitor Records
 - A visitor sign-in and sign-out log will be maintained at the security office. The log will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.
- Waste Disposal Records
 - When marijuana or marijuana products are disposed of, Wachusett Cannabis will create and maintain an electronic record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Wachusett Cannabis agents present during the disposal or other handling, with their signatures. Wachusett Cannabis will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Security Records
 - A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
 - Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.
 - Recordings shall not be destroyed or altered and shall be retained as long as necessary if Wachusett Cannabis is aware of pending criminal, civil or

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

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

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

 - Security measures in compliance with 935 CMR 500.110;
 - Employee security policies, including personal safety and crime prevention techniques;
 - A description of Wachusett Cannabis's hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
 - Storage of marijuana in compliance with 935 CMR 500.105(11);
 - Description of the various strains of marijuana to be processed or sold, as applicable, and the form(s) in which marijuana will be sold;
 - Price list for Marijuana Products;
 - 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 Wachusett Cannabis operations, which will be reported to the Commission; or
 - Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
- A list of all board of directors, members, and executives of Wachusett Cannabis, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on Wachusett Cannabis's website.
- Policies and procedures for the handling of cash on Wachusett Cannabis premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- Policies and procedures for energy efficiency and conservation that will include:
 - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
 - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
 - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.
- License Renewal and Impact Fee Records
 - Wachusett Cannabis shall keep all documentation related to license renewal applications submitted to the Commission, as well as any invoices of claimed community impact fees or other documentation submitted to or provided by the host municipality related to the company's operations.

Record-Retention

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