



## Massachusetts Cannabis Control Commission

### Marijuana Cultivator

#### General Information:

License Number: MC283045  
Original Issued Date: 03/16/2021  
Issued Date: 03/16/2021  
Expiration Date: 03/16/2022

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: ZGC LLC

Phone Number: 857-529-7422 Email Address: zack@zackahrens.com

Business Address 1: 200 HIGHLAND AVENUE Business Address 2: Suite 401

Business City: NEEDHAM Business State: MA Business Zip Code: 02494

Mailing Address 1: 200 HIGHLAND AVENUE Mailing Address 2: Suite 401

Mailing City: NEEDHAM Mailing State: MA Mailing Zip Code: 02494

### CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

### PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

### RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

### PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 33.33 Percentage Of Control: 33.33

Role: Owner / Partner Other Role:

First Name: Zachary Last Name: Ahrens Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

#### Person with Direct or Indirect Authority 2

Percentage Of Ownership: 33.33

Percentage Of Control: 33.33

Role: Owner / Partner

Other Role:

First Name: Gregory

Last Name: Cohen

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

#### Person with Direct or Indirect Authority 3

Percentage Of Ownership: 33.33

Percentage Of Control: 33.33

Role: Owner / Partner

Other Role:

First Name: Chris

Last Name: Regan

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

#### ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

#### CLOSE ASSOCIATES AND MEMBERS

No records found

#### CAPITAL RESOURCES - INDIVIDUALS

No records found

#### CAPITAL RESOURCES - ENTITIES

No records found

#### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

#### DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

#### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 806 Polikoff Rd

Establishment Address 2:

Establishment City: Sheffield

Establishment Zip Code: 01222

Approximate square footage of the Establishment: 261360

How many abutters does this property have?: 11

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

Cultivation Tier:

Cultivation Environment:

#### FEE QUESTIONS

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

### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	HCA_Certificate_Fully Executed_12.11.20.pdf	pdf	5fe26ca909cfae0810fd1823	12/22/2020
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant_Local Zoning_Application of Intent.pdf	pdf	5fe282d7eb00b107e45431f6	12/22/2020
Community Outreach Meeting Documentation	Community Outreach Meeting _Attachment B.pdf	pdf	5ff8a66089d382080d8ee6d4	01/08/2021
Community Outreach Meeting Documentation	Community Outreach Meeting _Attachment C.pdf	pdf	5ff8a68e9597d30802d2d00e	01/08/2021
Community Outreach Meeting Documentation	Attachment A.pdf	pdf	60009254e767d307ceee60c6	01/14/2021
Community Outreach Meeting Documentation	Public Outreach Mtg_11.30.20_ADA Transcript For Virtual MTG.pdf	pdf	6009c697ce58f607af0482a0	01/21/2021
Community Outreach Meeting Documentation	ZGC LLC_Virtual Meeting Town Approval Letter_Signed.pdf	pdf	6009c6e9134ce608487558d3	01/21/2021
Community Outreach Meeting Documentation	Public Video Recording Web Address_Virtual Public Mtg_ZGC LLC.pdf	pdf	6009c8f995aefe083da1296b	01/21/2021
Community Outreach Meeting Documentation	Public Outreach Meeting_Summary and Number of Participants_ZGC LLC.pdf	pdf	6009c9769aa497082efbc649	01/21/2021
Community Outreach Meeting Documentation	Meeting Materials Public Posting Web Address_Virtual Public Outreach Mtg_ZGC LLC_Signed.pdf	pdf	6009ca069a7da608237abecb	01/21/2021
Community Outreach Meeting Documentation	Community Outreach Meeting Attestation Form ZGC LLC.pdf	pdf	6009ca6a08a18c07fbbd48dd	01/21/2021
Community Outreach Meeting Documentation	Presentation Materials_Virtual Public Mtg_11.30.20_ZGCLLC.pdf	pdf	6009cabea4d1c40799969b2b	01/21/2021

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

### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact_V2_01.07.20.pdf	pdf	5ff7cd39841ecf07f32ab88c	01/07/2021
Other	Letter to CCC_Positive Impact_BAG_01.07.20 .pdf	pdf	5ff7ce01d18fa907c7d93201	01/07/2021

### ADDITIONAL INFORMATION NOTIFICATION

Notification:

### INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner      Other Role:  
First Name: Zachary      Last Name: Ahrens      Suffix:

RMD Association: Not associated with an RMD

Background Question: no

#### Individual Background Information 2

Role: Owner / Partner

Other Role:

First Name: Gregory

Last Name: Cohen Suffix:

RMD Association: Not associated with an RMD

Background Question: no

#### Individual Background Information 3

Role: Owner / Partner

Other Role:

First Name: Christopher

Last Name: Regan Suffix:

RMD Association: Not associated with an RMD

Background Question: no

#### ENTITY BACKGROUND CHECK INFORMATION

No records found

#### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	Cert. of Good Standing_Secretary of State of Mass..pdf	pdf	5fe3a03ce767d307ceee2b5d	12/23/2020
Department of Revenue - Certificate of Good standing	Cert of Good Standing_Dept of Revenue.pdf	pdf	5fe3a049b11eae07c3c56ceb	12/23/2020
Articles of Organization	Cert of Organization_ZGC.pdf	pdf	5fe3a0e8eb00b107e45434b7	12/23/2020
Bylaws	ZGC LLC_Operating Agreement_Fully Executed.pdf	pdf	5fe3b64f2027b107e8dc764d	12/23/2020
Department of Revenue - Certificate of Good standing	Dept Of Unemployment Assitance Attestation_Signed_1.1.21.pdf	pdf	5ff8a7459597d30802d2d014	01/08/2021

No documents uploaded

Massachusetts Business Identification Number: 001469218

Doing-Business-As Name:

DBA Registration City:

#### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	ZGC_Business Plan_12.23.20.pdf	pdf	5fe3b14d44f61c07f67fd4ad	12/23/2020
Proposed Timeline	ZGC_Timeline.pdf	pdf	5fe3b2adb11eae07c3c56d43	12/23/2020
Plan for Liability Insurance	ZGC_Plan to Obtain Liability Insurance.pdf	pdf	5fe3b35f89d382080d8ec44a	12/23/2020

#### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:



Document Category	Document Name	Type	ID	Upload Date
Restricting Access to age 21 and older	Restricting Access to age 21 and Older_ZGC.pdf	pdf	5fe4d033841ecf07f32a98a4	12/24/2020
Prevention of diversion	Prevention of Diversion_ZGC.pdf	pdf	5fe4d38344f61c07f67fd600	12/24/2020
Quality control and testing	Quality Control and Testing_ZGC.pdf	pdf	5fe4d9a2e826e207c07da298	12/24/2020
Record Keeping procedures	Record Keeping Procedures_ZGC.pdf	pdf	5fe4df2d2027b107e8dc77a9	12/24/2020
Maintaining of financial records	Maintenance of Financial Records_ZGC.pdf	pdf	5fe4e07d982b2307e1992964	12/24/2020
Qualifications and training	Dept Of Unemployment Assitance Attestation_Signed_1.1.21.pdf	pdf	5fef9e85982b2307e1993820	01/01/2021
Storage of marijuana	Storage Plan_V2_ZGC_01.04.20.pdf	pdf	5ff5f4192027b107e8dc90cb	01/06/2021
Transportation of marijuana	Transportation Plan_V2_ZGC_1.7.20.pdf	pdf	5ff78a0bd18fa907c7d93188	01/07/2021
Inventory procedures	Inventory Procedures_V2_01.07.23.pdf	pdf	5ff7a72f2027b107e8dc9711	01/07/2021
Policies and Procedures for cultivating.	Cultivation Plan V2_ZGC_01.07.20.pdf	pdf	5ff8994516d57608051fc3cb	01/08/2021
Security plan	Security Plan_ ZGC_V2_01.08.21.pdf	pdf	5ff899e7d18fa907c7d93387	01/08/2021
Personnel policies including background checks	Personnel Plan V2_ZGC_01.07.21.pdf	pdf	5ff89b77d18fa907c7d93392	01/08/2021
Energy Compliance Plan	Energy Compliance Plan_V2_ZGC_01.08.2020.pdf	pdf	5ff89e2136d86207eb969e64	01/08/2021
Qualifications and training	Qualification and Trainings_V4_ZGC_2.4.21.pdf	pdf	601c5ef61c95e43696cccf7	02/04/2021
Diversity plan	Diversity Plan_V4_ZGC_02.4.21.pdf	pdf	601c609065c0d035fcc4c160	02/04/2021

#### ATTESTATIONS

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

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

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

Notification:

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

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

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

#### ADDITIONAL INFORMATION NOTIFICATION

Notification:

#### COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

#### COMPLIANCE WITH DIVERSITY PLAN

No records found

#### HOURS OF OPERATION

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

## Host Community Agreement Certification Form

### Instructions

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

### Certification

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

1. Name of applicant:

ZGC LLC

2. Name of applicant's authorized representative:

Zachary Ahrens

3. Signature of applicant's authorized representative:



4. Name of municipality:

Sheffield

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

Rhonda LaBombard



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

Rhonda LaBombard

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

Rhonda LaBombard <rlabombard@sheffieldma.gov>

8. Host community agreement execution date:

12-8-2020



ZGC LLC  
CCC Applicant  
December, 2020

### **Plan to Remain Compliant with Local Zoning**

ZGC LLC (“ZGC”) will remain compliant at all times with the local zoning requirements as set forth in the Town of Sheffield’s (“Town”) Zoning By-Laws.

669 - 799 Polikoff Rd is undeveloped land in a Rural District which does not have any restrictions related to the Outdoor Cultivation License ZGC seeks. ZGC will acquire all the necessary Building Permits, and Special Use Permits required by the Town, and the relevant local municipal departments (including but not limited to; Building & Planning, Assessor's Office, Highway, & Police Departments etc).

We have confirmed with the Town that ZGC’s cultivating activities are allowed as a right under the local Zoning Code. ZGC has already convened a Community Outreach Meeting for its proposed Marijuana Establishment and has also executed a Host Community Agreement with the Town.

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

**ATTACHMENT B**

**ATTACHMENT B**

**November 18th, 2020**



**Community Outreach Meeting Public Notice**

In accordance with Sections 18-25 of Chapter 30A of the Massachusetts General Laws and the Governor's Order suspending certain provisions of the Open Meeting Law, M.G.L. Ch. 30A §20, notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **November, 30th at 7:00PM.** The meeting will take place as noted below.

The proposed outdoor cultivation establishment is anticipated to be located at **[669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.1 : 267/008.0-0001-0008.1 & Parcel ID, 8.2: 267/008.0-0001-0008.2** with a final address to be determined by the Town of Sheffield. There will be an opportunity for the public to ask questions.

Remote participation via weblink at <https://tinyurl.com/y57equjj>, **Meeting ID [784 7604 0721]** or dial-in at **(+1).646.558.8656.**



ATTACHMENT C

**Notification to Abutters under the Adult Use of Marijuana Regulations of Cannabis Control Commission, 935 CMR 500 and the Town of Sheffield Host Community Agreement Application Requirements**

Date Mailed: November 13th, 2020

In accordance with 935 CMR 500.101, you are hereby notified of the following:

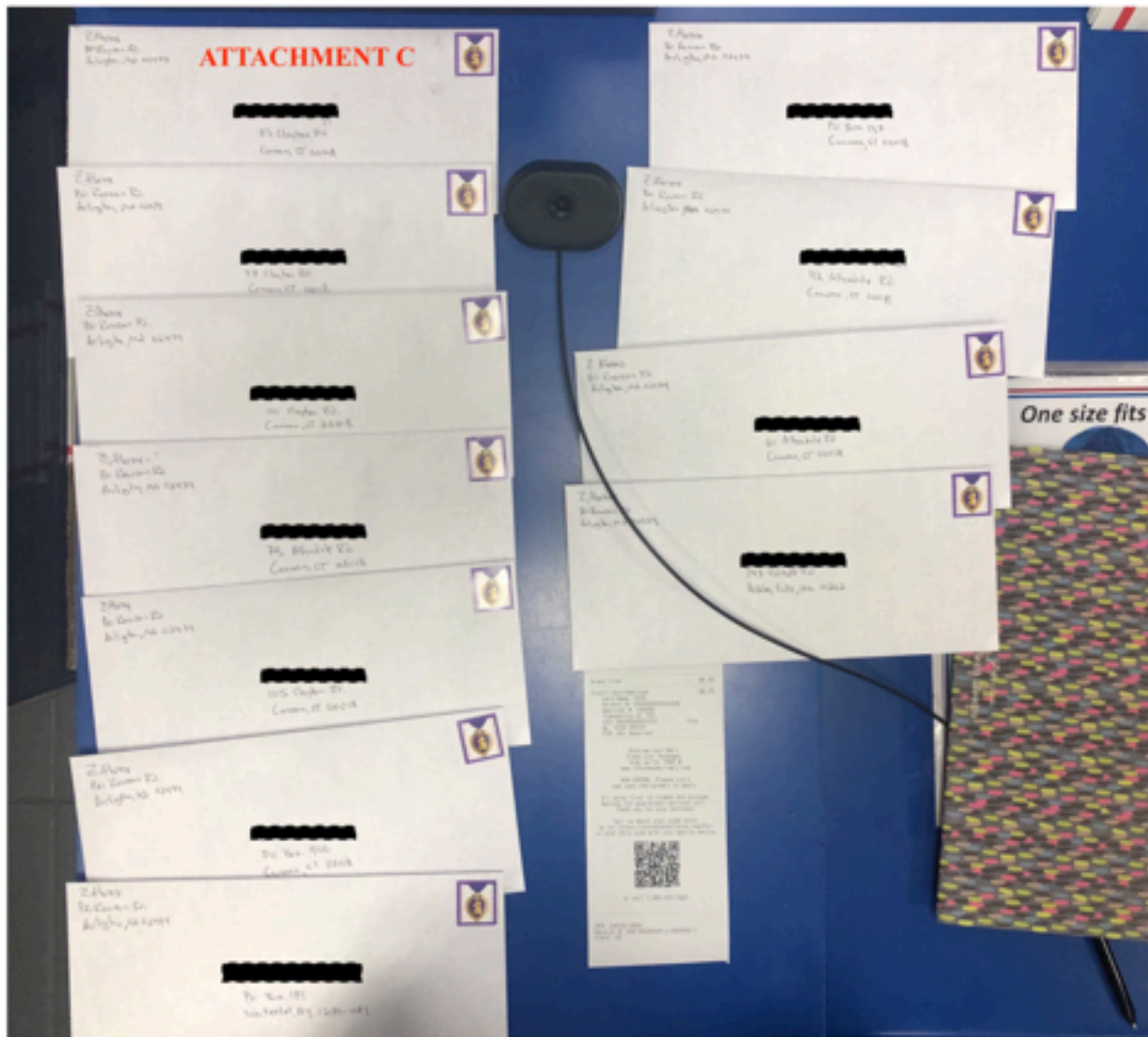
ZGC LLC will host a Community Outreach Meeting for a proposed Marijuana Cultivation Establishment at the proposed address of:

669-799 Polikoff Rd, Sheffield, Massachusetts, 01222, or 0 Polikoff Rd, Sheffield, Massachusetts 01222 according to the Town of Sheffield's Assessing Department with a Property ID of "267/008.0-0001-0008.2"

In accordance with Sections 18-25 of Chapter 30A of the Massachusetts General Laws and the [Governor's Order suspending certain provisions of the Open Meeting Law, M.G.L. Ch. 30A, §20.](#) notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **November, 30th at 7:00PM**. The meeting will take place as noted below and there will be an opportunity for the public to ask questions.

Remote participation via weblink at <https://tinyurl.com/y57equji>, Meeting ID [784 7604 0721] or dial-in at (+1).646.558.8656.

## ATTACHMENT C





# Berkshire County Careers



To advertise call 413-496-6365 or email [classifieds@newenglandnewspapers.com](mailto:classifieds@newenglandnewspapers.com)

[berkshireeagle.com/careers](http://berkshireeagle.com/careers)  
The Berkshire Eagle



**BERKSHIRE  
MONEY  
MANAGEMENT**

*The Knowledge and Experience to Build Your Wealth*



## Berkshire Money Management is growing!

### FINANCIAL ADVISOR

BMM is looking for a financial advisor to oversee a new branch office in Berkshire County. Equity opportunities will be considered for advisors with a large enough book of business and/or a proven business development pipeline. The preferred candidate will be able to deliver financial plans via MoneyGuidePro. The advisor will act as an intermediary between BMM and clients and be active in developing new business. BMM will provide you with the operational and marketing support you need to elevate your business to the next level.

**Responsibilities:**

- Implement strategies to cultivate and engage new and varying target markets.
- Planning and managing resources to run a productive practice while seeking the expertise of specialists within the firm.
- Cultivate client base, generate referrals, and network to generate additional leads/opportunities
- Keep abreast of new industry's trends and developments
- Comply with all industry rules and regulations
- Creating financial plans for high-net-worth clients

**Skills:**

- Proven working experience as a financial advisor, financial planner, private banker, investment specialist or relevant experience

- Track record of successful business development
- Ability to analyze financial data and provide appropriate data-based advice clearly and simply

**Compensation:**

- Match your current guaranteed base, plus 5%
- Commissions on new assets under management
- Share of financial planning fees
- Negotiable pay based on transferred-in clients and/or success

**Benefits:**

- 401(k) with matching
- Dental insurance
- Flexible spending account
- Health insurance (fully paid)
- Paid continued education
- Paid vacation

**Submit inquiries to Allen Harris at [AHarris@BerkshireMM.com](mailto:AHarris@BerkshireMM.com) or call 413-997-2006. Visit [BerkshireMM.com](http://BerkshireMM.com)**



## Classified Sales Specialist

New England Newspapers Inc. publishes three daily newspapers — The Berkshire Eagle (Pittsfield, Mass.); the Bennington Banner (Bennington, Vt.) and the Brattleboro Reformer (Brattleboro, Vt.) — along with one weekly, the Manchester Journal (Manchester, Vt.)

**Do you like working in a fast-paced, team environment?  
Are you highly motivated, sales driven and love talking on the phone? Then we have a job for you!**

We have an immediate opening in our Pittsfield office for a qualified candidate to help drive advertising sales in our Classified Department. This full-time position will work to prospect and grow revenue for our Classifieds in both print and digital publications. Responsibilities include inbound/outbound sales calls, assisting customers with varying advertiser needs, collaborating with members of the team to launch and manage projects, and overall accountability for all classified verticals. The right person must be sales driven, highly organized, and able to work alongside a team in a fast-paced environment. Attention to detail and prompt courteous customer service skills are a must. Basic computer skills are required. We offer a competitive base salary, monthly bonus and commission opportunities. New England Newspapers is an EOE.

**Our full-time benefits package offers health, dental, vision, life insurance, 401k, vacation and sick time. To apply, please complete the on-line application at [berkshireeagle.com/apply](http://berkshireeagle.com/apply) and attach your resume and cover letter.**

### The Berkshire Eagle

**[berkshireeagle.com/apply](http://berkshireeagle.com/apply)**  
[berkshireeagle.com](http://berkshireeagle.com)





## BFAIR

### Gift yourself with a rewarding new career this holiday season!

Come join a premier human services agency, serving individuals with disabilities seeking candidates for our Residential, Clinical and Homecare programs throughout Berkshire County. We have openings for Direct Care, Behavior Specialists and LPNs. FT, PT and Per Diem Openings Available (no specialized training/certification required for most positions). If you are caring, compassionate, and motivated we have a job for you. Valid US license required. BFAIR offers an excellent benefit package. **APPLY NOW [www.bfair.org](http://www.bfair.org) AA/EOE**



## SHOPLOCAL SEO

Increase Your Local Footprint

ShopLocal Featured Advertiser's SEO is perfect for small, medium and enterprise businesses looking to expand their digital footprint and stand out against their competition.

### ShopLocal SEO STATS

**2.7x** more likely to be considered reputable

**7x** more clicks

**70%** more likely to attract location visits

**50%** more likely to purchase

- ✓ Digitized ShopLocal Feature with Search Engine Optimization Benefits
- ✓ Digital Landing Page with Searchable Directory Data

For more info, call your Account Executive OR 413.496.6226 or email [DigitalSolutions@NewEnglandNewspapers.com](mailto:DigitalSolutions@NewEnglandNewspapers.com)  
All rates include digital presence on ShopLocal. Ask your Account Executive for details.



## Berkshire County Classifieds

To advertise call 413-496-6365 or email [classifieds@newenglandnewspapers.com](mailto:classifieds@newenglandnewspapers.com)

### The Berkshire Eagle

#### Help Wanted

### PRESS TRAINEES AND OPERATORS

Full-time openings available for web press trainees and operators on the night shift, M-F. You must have an aptitude for mechanical work. Dependability is the most important requirement. Press experience is a big plus. In the New England Newspapers training program you will learn all aspects of commercial web printing on a Goss Urbanite and Community presses, as well as platemaking equipment. Full time employees receive a benefits package that includes health, dental, vision, life insurance, and 401(k). **To apply please go to [Berkshireeagle.com/apply](http://Berkshireeagle.com/apply) and complete the online application.**

**The Berkshire Eagle**

#### Public Notices

### Community Outreach Meeting Public Notice

In accordance with Sections 18-25 of Chapter 30A of the Massachusetts General Laws and the Governor's Order suspending certain provisions of the Open Meeting Law, M.G.L. Ch. 30A §20, notice is hereby given that a **Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for November, 30th at 7:00 PM.** The meeting will take place as noted below.

The proposed outdoor cultivation establishment is anticipated to be located at **[669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Property ID: 267/008.0-0001-0008.2** with a final address to be determined by the Town of Sheffield. There will be an opportunity for the public to ask questions.

Remote participation via weblink at <https://tinyurl.com/y57equij>  
**Meeting ID [784 7604 0721]** or dial-in at (+1) 646-558-8656

AD# 53011  
11/14/2020

### TOWN OF SANDSFIELD NOTICE OF PUBLIC HEARING CONSERVATION COMMISSION

On Tuesday, November 17, 2020, there will be a public hearing at 7:00 p.m. held by the Sandisfield Conservation Commission on a Request for Determination of Applicability filed by Carl Ekroth for 309 Tamarack Trail, map 402 lot 25. The purpose of the RDA is to determine if the new garage and driveway extension is subject to the Wetlands Protection Act in accordance with the provisions M.G.L. c. 131, section 40. The hearing will be remote: **Meeting link:** <https://swm-intl.webex.com/swm-intl/j.php?MTID=mbc98561f846943571af8fb62e7105fa6>  
**Meeting number:** 172 581 4532  
**Password:** Conservation  
**Or join by phone:** 1-650-479-3208  
**Access code:** 172 581 4532

Sandisfield Conservation Commission

AD# 53043  
11/14/2020

### Commonwealth of Massachusetts Superior Court Probate and Family Court Berkshire Probate and Family Court 44 Bank Row Pittsfield, MA 01201 (413)442-6941

**CITATION ON PETITION TO CHANGE NAME**  
Docket No. BE20C0080CA

In the matter of:  
**Kiara Elizabeth Taylor**

A Petition to Change Name of Adult has been filed by **Kiara Elizabeth Taylor of Adams MA** requesting that the court enter a Decree changing their name to: **Kiara Elizabeth Bresett**

**IMPORTANT NOTICE**  
Any person may appear for purposes of objecting to

#### Public Notices

petition by filing an appearance at: Berkshire Probate and Family Court before 10:00 a.m. on the return day of 12/07/2020. This is NOT a hearing date, but a deadline by which you must file a written appearance if you object to this proceeding.

**WITNESS,**  
**Hon. Richard A Simons,**  
First Justice of this Court.  
Date: November 09, 2020  
**Francis B. Marinaro**  
Register of Probate

Ad# 53052  
11/14/2020

### TOWN OF LEE, MASSACHUSETTS NOTICE OF A PUBLIC HEARING

Re: 175 Willow Street

The Planning Board will hold a Public Hearing on **Monday, December 7, 2020 at 6:15 P.M.** on the application of Tina Earl for approval of a Special Permit under Section 6.1(B) and (E) of the town land use regulations. The applicant seeks to install a prefabricated home at 175 Willow Street, (Assessors' Map 29, Lot 96) on a permanent slab at a location previously used for a mobile home.

**The meeting will be held using teleconferencing software, and the audio part will be accessible by telephone. Any person interested, or wishing to be heard should attend by internet video link, internet audio link or telephone link at the time designated. Link information is available from the Lee Town Clerk and on the town's website.** If unable to attend please submit written comments to the Lee Planning Board at 32 Main Street, Lee, MA. 01238. Failure to make recommendations shall be deemed lack of opposition. A copy of the application is available for review in the Town Clerk's Office.

Matthew Carlino  
Chairman

AD# 53053  
11/14/2020, 11/21/2020



# Public Outreach Meeting

The proposed outdoor cultivation establishment is anticipated to be located at [669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.2: 267/008.0-0001-0008.2 with a final address to be determined by the Town of Sheffield



ZGC LLC  
Public Outreach Mtg  
Date: 11.30.20  
Proposed Address: [669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.2: 267/008.0-0001-0008.2  
RE: Marijuana Establishment Tier-11 Outdoor Cultivation (100,000 sqft)

## Transcript for ADA Virtual Meeting Compliance:

Welcome everyone to the public meeting for ZGC LLC. I am Zack Ahrens and I am joined by my fellow co-founders; Greg Cohen and Chris Regan. Together we are proposing a Tier-11 Marijuana Establishment at the end of Polikoff Road near the CT border. This presentation is part of our application process and is required by law and it is an opportunity for you to ask questions and hear more about the project. Let's begin.

# Agenda

November 30, 2020

1. Project Overview & Company Values
2. Location / Site Plan
3. Security Plan
4. Diversion Plan
5. Community Impact Plan
6. About Us
7. Questions

ZGC LLC  
Public Outreach Mtg  
Date: 11.30.20  
Proposed Address: [669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.2: 267/008.0-0001-0008.2  
RE: Marijuana Establishment Tier-11 Outdoor Cultivation (100,000 sqft)

## Transcript for ADA Virtual Meeting Compliance:

Today we will cover.

1. Project Overview & Company Values
2. Location / Site Plan
3. Security Plan
4. Diversion Plan
5. Community Impact Plan
6. About Us
7. Questions

Statement on the regulations =

In accordance with Sections 18-25 of Chapter 30A of the Massachusetts General Laws and the Governor's Order suspending certain provisions of the Open Meeting Law, M.G.L Ch. 30A §20, notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for November, 30th at 7:00PM. The meeting will take place as noted below.

The proposed outdoor cultivation establishment is anticipated to be located at [669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.1 : 267/008.0-0001-0008.1 & Parcel ID, 8.2: 267/008.0-0001-0008.2 with a final address to be determined by the Town of Sheffield. There will be an opportunity for the public to ask questions.

Remote participation via weblink at <https://tinyurl.com/y57equjj>, Meeting ID [784 7604 0721]  
or dial-in at (+1).646.558.8656.

# Overview & Company Values

- ZGC LLC is a cannabis **wholesale supply company** that seeks to sell high quality outdoor cannabis ingredients to wholesale buyers in MA.
- We are seeking a **Tier-11 100,000 sqft outdoor cultivation license** at the proposed location in Sheffield and aspire to be operational by the end of next year 2021.
- We seek to develop our land using **regenerative low-impact farming** practices and to educate the MA market about the value and quality of cannabis products that are grown under the Sun aka “**Sungrown**”



935 CMR 500.101(9)(f)(i) The type(s) of Marijuana Establishment to be located at the proposed address;



## Transcript for ADA Virtual Meeting Compliance:

Our company is built on sustainability principles and compliance. We aim to be a wholesaler of marijuana products and run a profitable farm business.

- ZGC LLC is a cannabis wholesale supply company that seeks to sell high quality outdoor cannabis ingredients to wholesale buyers in MA.
- We are seeking a Tier-11 100,000 sqft outdoor cultivation license at the proposed location in Sheffield and aspire to be operational by the end of next year 2021.
- We seek to develop our land using regenerative low-impact farming practices and to educate the MA market about the value and quality of cannabis products that are grown under the Sun aka “Sungrown”

# Location / Site Plan

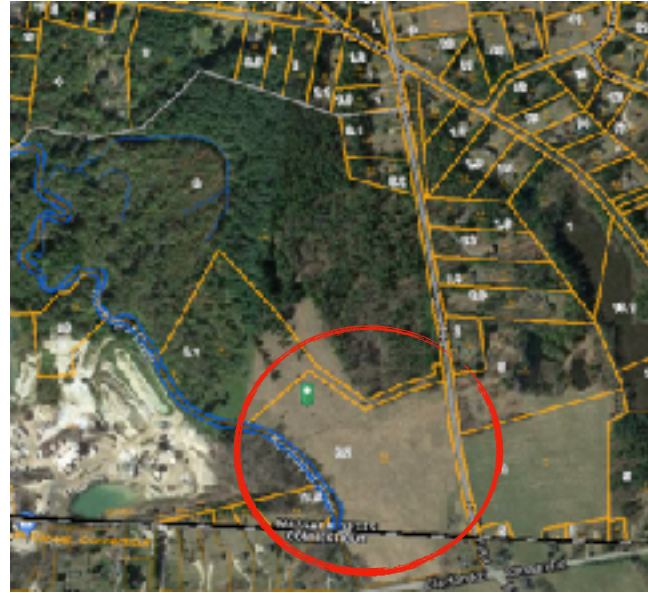


ZGC LLC  
Public Outreach Mtg  
Date: 11.30.20  
Proposed Address: [669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.2: 267/008.0-0001-0008.2  
RE: Marijuana Establishment Tier-I Outdoor Cultivation (100,000 sqft)

## Transcript for ADA Virtual Meeting Compliance:

Our location is on the southern edge of town near the CT border. At the end of Polikoff Rd we are leasing 6 acres of rural zoned land w/ 11 abutters (neighbors that have been notified in written about this meeting per regulations).

# Location / Site Plan



ZGC LLC  
Public Outreach Mtg  
Date: 11.30.20  
Proposed Address: [669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.2: 267/008.0-0001-0008.2  
RE: Marijuana Establishment Tier-1 Outdoor Cultivation (100,000 sqft)

## Transcript for ADA Virtual Meeting Compliance:

This is a close up view of the location we will be on the parcel that is circled in red and at least 500 ft from the road. The black line is the CT border. A detailed site plan draft is on the next slide.

# Location / Site Plan

**SITE PLAN**

**LOCATION** : POLIKOFF RD, SHEFFIELD MASSACHUSETTS 01222

**PROPERTY ID** : 8.2 = PARCEL ID: 267/008.0-0001-0008.2

**LEGEND**

- Fencing corner
- Light
- Greenhouses

**note**

**ARCHITECT**  
C. REGAN

**DESIGNED** : CR

**CHECKED** : CR

**DATE** : Nov 2020

**CLIENT**  
ZGC LLC

**PROJECT**  
SITE PLAN

**LOCATION**  
POLIKOFF RD, SHEFFIELD  
MASSACHUSETTS 01222

**Sheet NO.**  
01

**SCALE** :  
1/64" = 1'-0"

liance:



# Location Security Plan



Lexington Alarm Systems is residential and commercial security company that has decades of experience and has contracted with ZGC on numerous other projects.

ZGC LLC  
Public Outreach Mtg  
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Proposed Address: [669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.2: 267/008.0-0001-0008.2  
RE: Marijuana Establishment Tier-I | Outdoor Cultivation (100,000 sqft)

**935 CMR 500.101(9)(f)(ii).** Information adequate to demonstrate that the location will be maintained securely;

## Security Features

- Secure fenced in perimeter
- Motion sensor lights
- Daily visual inspection
- Limited employee access to storage facilities (all cannabis storage will be mechanically secure)
- Confirm w/ plan with local police department
- 24/7 Security / Surveillance
- Commercial Alarm System
- Commercial Video Surveillance
- Access Control Systems
- Remote Monitoring Capabilities
- Confirm review plan with Sheffield Police Department and Canaan, CT police department

## Transcript for ADA Virtual Meeting Compliance:

This slide details one of the security providers we are in discussions and at a minimum we will have and install the security features that are listed above and required by regulation. Please refer to the text on the slide for more information about the security plan.

# Diversion Prevention to Minors Plan

- Rigorous inventory reconciliation procedures (as required by 935.CMR.101 and internal accounting and inventory management protocol/SOPS)
- Storage facilities mechanically secure (pad locks and under 24/7 video surveillance)
- Key in and key out protocols through security system
- Limited visitation rights (approved guests only)
- No drop ins allowed (only previously scheduled and approved visits)
- All employees will be trained on the visitation policy and all employees will undergo background checks.

ZGC LLC  
Public Outreach Mtg  
Date: 11.30.20  
Proposed Address: [669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.2: 267/008.0-0001-0008.2  
RE: Marijuana Establishment Tier-11 Outdoor Cultivation (100,000 sqft)  
**935 CMR 500.101(9)(f)(iii)** Steps to be taken by the Marijuana Establishment to prevent diversion to minors;

## Transcript for ADA Virtual Meeting Compliance:

This is a slide that covers our policies to prevent diversion to minors and keep the licensed premises safe and secure. Please refer to the slide text for information on the plan.

# Community Impact Plan Proposal



## Community Produce Box Donations

- Dedicate ~ 1/2 acre of land for food production and donate harvest to local food groups, community centers, and food service professionals (\$15-20K retail value).
- To be conducted outside of our cannabis licensed “canopy”
- Educate and train volunteers who are interested in learning about the local food system and the benefits of regenerative farming.
- Destigmatize cannabis as an agricultural crop.

ZGC LLC  
Public Outreach Mtg  
Date: 11.30.20  
Proposed Address: [669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.2: 267/008.0-0001-0008.2  
RE: Marijuana Establishment Tier-I Outdoor Cultivation (100,000 sqft)

**935 CMR 500.101(9)(f)(v).** Information adequate to demonstrate that the location will not constitute a nuisance as defined by law;

## Transcript for ADA Virtual Meeting Compliance:

Our proposed plan to impact the local community is in line with our company values of land stewardship. We hope to produce food for local good service groups, shelters, and food professionals.

This will happen outside of the licensed canopy area but on the parcel where we are leasing - we are thinking about planting 1/2 acre of mixed seasonal vegetables.

## Statement that location will not be a nuisance as defined by law

- ZGC will abide by all necessary local and state laws as required by the Town of Sheffield and in accordance with MA G.L. Chapter 139 “Common Nuisances”
- ZGC will compost and recycle all plant waste on-site or as required by 935 CMR 500
- ZGC will not have loud operating equipment or processes during the course of regular business hours throughout the year.
- ZGC will only have lights at night for security purposes.
- ZGC will need to work extended hours during harvest season (Aug - Oct) but will not need to operate a grave yard shift or a second shift during a majority of the year.
- There will be minimal outside activity during winter season.

ZGC LLC  
Public Outreach Mtg  
Date: 11.30.20

Proposed Address: [669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.2: 267/008.0-0001-0008.2  
RE: Marijuana Establishment Tier-1 Outdoor Cultivation (100,000 sqft)

**935 CMR 500.101(9)(f)(v)** Information adequate to demonstrate that the location will not constitute a nuisance as defined by law;

Transcript for ADA Virtual Meeting Compliance:

This slide is statement that states we will not be a nuisance. Please refer to the slide text.

# ZGC LLC FOUNDING TEAM

Zack Ahrens



Operations/Compliance

Zack has 5+ yrs of experience in the cannabis industry as a consultant and working for the #1 flower processing, branding and distribution company in California ("CA"). He has launched or developed over 20 unique cannabis products, and worked with numerous top tier brands. He holds an MBA in Sustainable Management.

Greg Cohen



Biz. Dev / Fundraising

Greg brings 25+ yrs years of experience in real estate acquisition, development and general contracting. He has overseen dozens of multi-million-dollar projects in real estate and at early stage, high -growth companies. For the last 5 yrs he has been deeply involved in large scale cannabis & hemp processing operations across the United States.

Chris Regan



Farm Operations

Chris has over 2 decades of regenerative / organic farming experience in Western, MA and NY. For the past 5 years he has been cultivating and working with industrial hemp and cannabis. Chris is responsible for the success of the harvest, breeding unique genetics and overseeing all aspects of farm operations.

## Transcript for ADA Virtual Meeting Compliance:

We are an experienced veteran group of cannabis, business and farming professionals and we have a deep cannabis specific professional network to draw on that will enable us to start and run a successful cannabis farm in your town of Sheffield, MA. Please refer to the text on the slide for more information about our specific backgrounds and areas of expertise.

# Questions



**For more information please contact:**

[greg@voda hemp.com](mailto:greg@voda hemp.com) or [zack@zackahrens.com](mailto:zack@zackahrens.com)

ZGC LLC  
Public Outreach Mtg  
Date: 11.30.20  
Proposed Address: [669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.2: 267/008.0-0001-0008.2  
RE: Marijuana Establishment Tier-I Outdoor Cultivation (100,000 sqft)

Transcript for ADA Virtual Meeting Compliance:

Questions...

Follow up questions or request for presentation materials you can use the contact information on the slide.



***Town of Sheffield***  
***Board of Selectmen***  
***Town Hall – 21 Depot Square***  
***Sheffield, Massachusetts 01257***

***Voice: 413-229-7000***

***Fax: 413-229-7010***

***TTY: 800-439-2370***

January 20, 2021


RE: ZGC LLC (MCN283045) Virtual Community Outreach Meeting,

Dear Cannabis Control Commission,

This is a letter stating that the Select Board approved that the ZGC LLC (the Applicant) held a virtual Community Outreach Meeting per the guidance set out in Section 3 of your Administrative Order No. 2: Allowing Virtual Web-Based Community Outreach Meetings

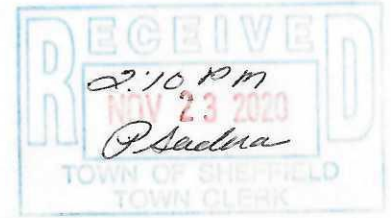
The Applicant held their virtual meeting on November 30<sup>th</sup>, 2020 and the Board was invited to attend.

Sincerely,

  
\_\_\_\_\_  
Rene C. Wood, Chairman



November 18th, 2020



**Community Outreach Meeting Public Notice**

In accordance with Sections 18-25 of Chapter 30A of the Massachusetts General Laws and the Governor's Order suspending certain provisions of the Open Meeting Law, M.G.L. Ch. 30A §20, notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **November, 30th at 7:00PM**. The meeting will take place as noted below.

The proposed outdoor cultivation establishment is anticipated to be located at **[669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.1 : 267/008.0-0001-0008.1 & Parcel ID, 8.2: 267/008.0-0001-0008.2** with a final address to be determined by the Town of Sheffield.

There will be an opportunity for the public to ask questions.

Remote participation via weblink at <https://tinyurl.com/y57equjj>, Meeting ID [784 7604 0721] or dial-in at (+1).646.558.8656.



RE: ZGC LLC (MCN283045, the “Applicant”), RFI2, Community Outreach Documentation – Virtual Meeting

Dear Cannabis Control Commission,

☐ This is a public video link recording of our Virtual Public Outreach Meeting.  
[https://www.youtube.com/watch?v=H2\\_mqEOUNFc](https://www.youtube.com/watch?v=H2_mqEOUNFc)

Sincerely,

On Behalf of ZGC LLC,

A handwritten signature in black ink, appearing to read 'Zack Ahrens', with a stylized flourish at the end.

Zack Ahrens  
01.14.21

**Date:** 11.30.20

Letter to Town Administrator, Summary of Public Outreach Meeting for Proposed Marijuana Establishment

**Type of Marijuana Establishment (“ME”):** Tier-11 Outdoor Cultivation (100,000 sqft.)

**Location of Proposed ME:** “669 - 799 Polikoff Rd at an exact address to be un by the Town of Sheffield pending site plan approval” Parcel ID, 8.2: 267/008.0-0001-0008.2

**Entity:** Proposed by ZGC LLC (the “Applicant”)

**ZGC Founding Team and Presenting Representatives**

- Zack Ahrens
- Greg Cohen
- Chris Regan

**Total Number of Participants = 5.** ZGC LLC (MCN283045) “The Applicant shall submit to the Commission the number of participants attending the meeting.”

**Sheffield HCA Application Check List Item:**

- “Hold your Community Outreach Meeting. Advertise your meeting in a local paper, mail notices of meeting to abutters, and post your meeting notice on the Town meeting board. After your Community Outreach Meeting provide a letter to the Town Administrator stating the results, when it was held, number of attendees, and a summation of questions/concerns raised”

Dear Town Administrator Rhonda LaBombard,

The public outreach meeting was attended by a neighbor (abutter) of the proposed marijuana establishment and Ken Smith, Chairmen of The Planning Board in Sheffield. The meeting was also attended by the founders of ZGC LLC, making the total attendance of the public meeting five (5).

The meeting took place on November 30th, 2020 and began at 7pm EST - it was held in a virtual format due to COVID-19 restrictions. The presentation covered; ZGC company values, our approach to cultivation, our community impact/security/anti-diversion plans, an overview of the location and site plan, and also our statement to abide by all nuisance laws.

Ken asked if our community garden would be within the licensed fenced area to which we replied, “no”. The fenced area will be for marijuana business activities only and the community garden will be located somewhere else on the leased property (but still on the Parcel listed above).

Ken also recommended that we look up the dark skies By-Law in town to be sure we are in compliance with the language regarding light after sunset. Our assumption is that it won't be a nuisance because the lights will be motion censored, similar to the other businesses in the area that have night time security measures in place.

At the end of our meeting our contact information was given out so any attendees could ask follow up questions or email us to receive a copy of the presentation. The local abutter was also invited to take a tour of the property with us sometime in the near future to get a better idea of the project.

Sincerely,

Zack Ahrens

Founder, ZGC LLC

[Zack@zackahrens.com](mailto:Zack@zackahrens.com)

RE: ZGC LLC (MCN283045, the “Applicant”), RFI2, Community Outreach Documentation – Virtual Meeting

Dear Cannabis Control Commission,

☐ The Applicant shall post on a publicly accessible website all meeting materials at least 24 hours in advance of the meeting.

Meeting materials were posted at this URL before the meeting took place  
<https://www.zackahrens.com/public-mtg-materials>.

Presentation materials were also discussed at an in-person Planning Board Meeting on November 18<sup>rd</sup>, 2020 where we confirmed with the Town of Sheffield’s Planning Board that we were going to host a virtual community outreach meeting per the Executive Order of the Governor of Massachusetts which made amendments to the Open Meeting Law to allow public meetings to take place virtually because of the COVID-19 pandemic<sup>1</sup>

Sincerely,

On Behalf of ZGC LLC,



Zack Ahrens  
01.14.21

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<sup>1</sup> <https://www.mass.gov/service-details/updated-guidance-on-holding-meetings-during-the-covid-19-state-of-emergency>

## Community Outreach Meeting Attestation Form

### Instructions

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

### Attestation

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

1. The Community Outreach Meeting was held on the following date(s): 

11.30.20
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: 11.14.20
- b. Name of publication: Berkshire Eagle

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

- a. Date notice filed: 11.23.20

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

- a. Date notice(s) mailed: 11.13.20

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:

ZGC LLC

Name of applicant's authorized representative:

Zack Ahrens

Signature of applicant's authorized representative:



# Public Outreach Meeting

The proposed outdoor cultivation establishment is anticipated to be located at [669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.2: 267/008.0-0001-0008.2 with a final address to be determined by the Town of Sheffield



ZGC LLC

Public Outreach Mtg

Date: 11.30.20

Proposed Address: [669-799] Polikoff Rd, Sheffield, Massachusetts, 01222, Parcel ID, 8.2: 267/008.0-0001-0008.2

RE: Marijuana Establishment Tier-1 Outdoor Cultivation (100,000 sqft)



# Agenda

## November 30, 2020

1. Project Overview & Company Values
2. Location / Site Plan
3. Security Plan
4. Diversion Plan
5. Community Impact Plan
6. About Us
7. Questions

ZGC LLC

Public Outreach Mtg

Date: 11.30.20

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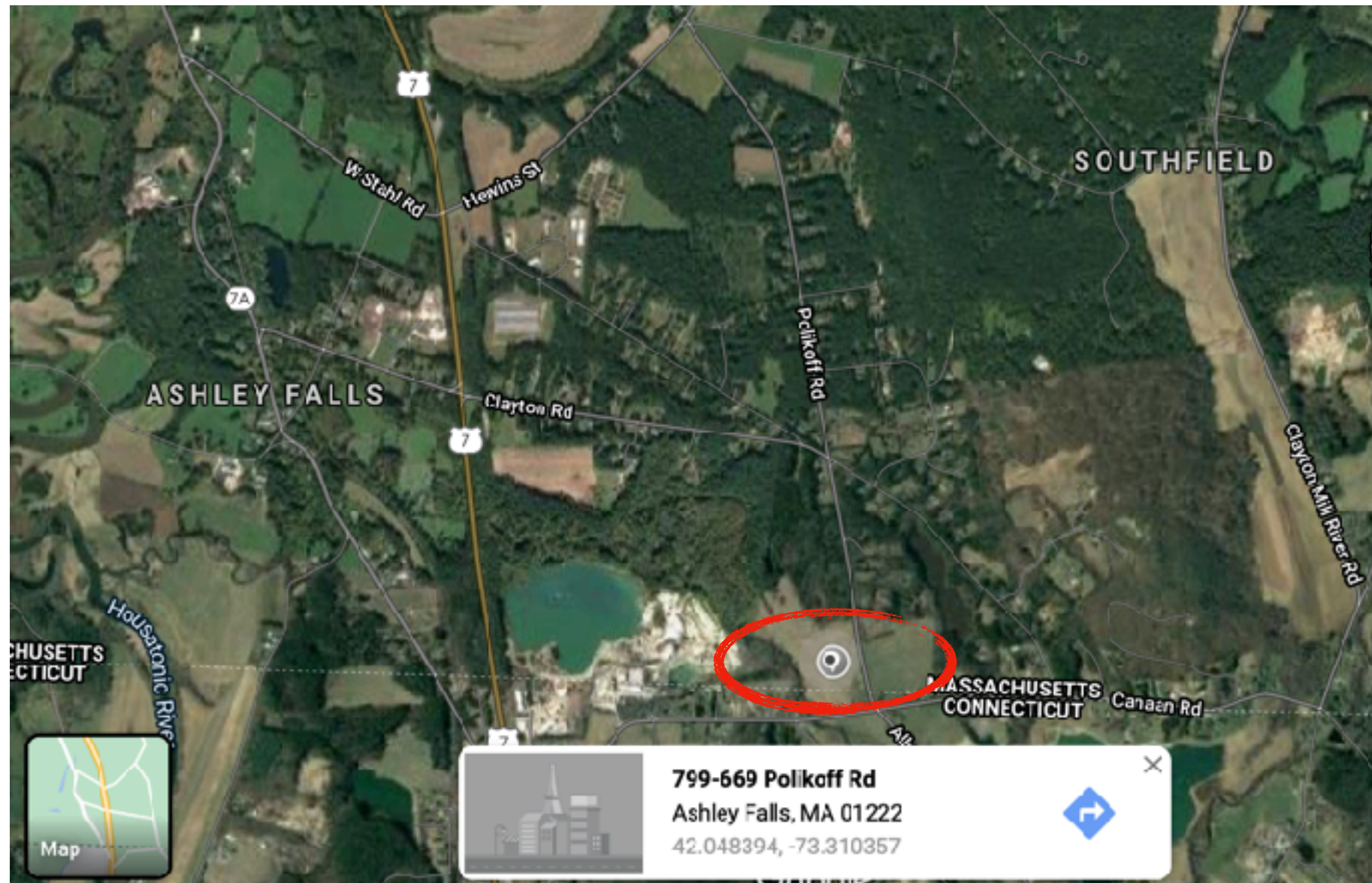
# Overview & Company Values

- ZGC LLC is a cannabis **wholesale supply company** that seeks to sell high quality outdoor cannabis ingredients to wholesale buyers in MA.
- We are seeking a **Tier-1 100,000 sqft outdoor cultivation license** at the proposed location in Sheffield and aspire to be operational by the end of next year 2021.
- We seek to develop our land using **regenerative low-impact farming** practices and to educate the MA market about the value and quality of cannabis products that are grown under the Sun aka “**Sungrown**”

## The Three Pillars of Sun+Earth Certification



# Location / Site Plan



ZGC LLC

Public Outreach Mtg

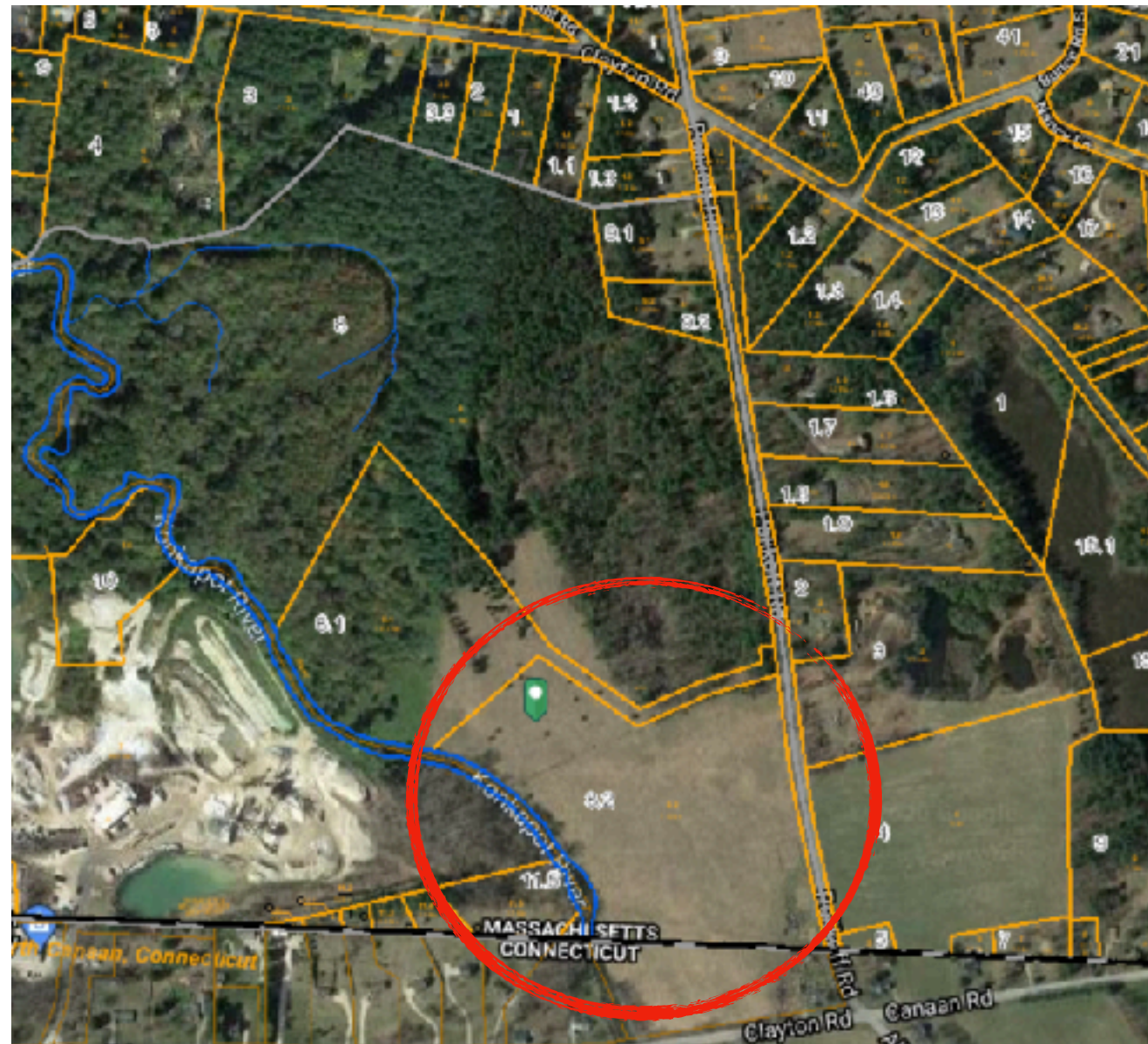
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# Location / Site Plan



ZGC LLC

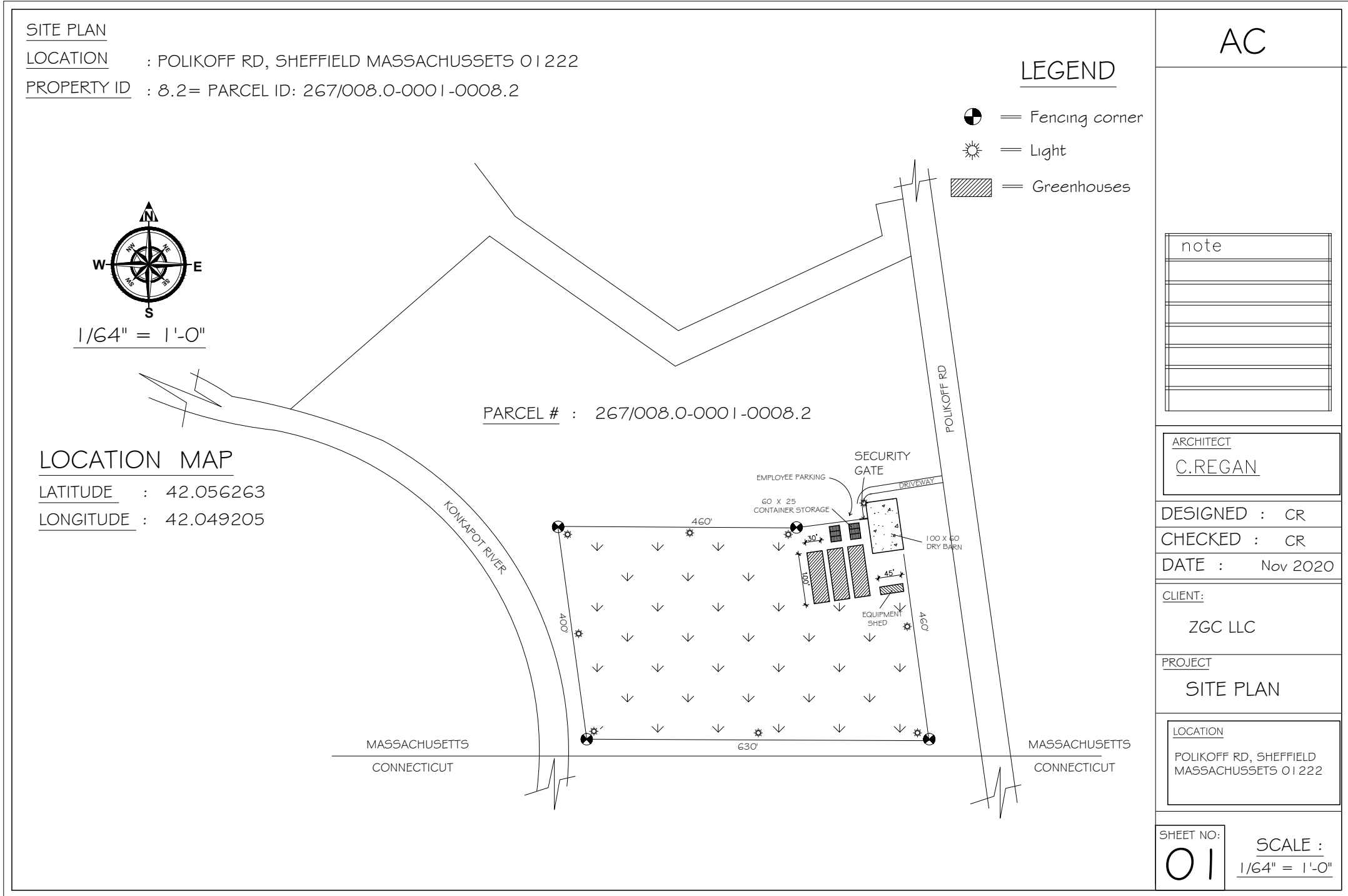
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# Location / Site Plan



# Location Security Plan

**Lexington**  
**AlarmSystems**

A WAYNE ALARM SYSTEMS COMPANY



Lexington Alarm Systems is residential and commercial security company that has decades of experience and has contracted with ZGC on numerous other projects.

## Security Features

- Secure fenced in perimeter
- Motion sensor lights
- Daily visual inspection
- Limited employee access to storage facilities (all cannabis storage will be mechanically secure)
- Confirm w/ plan with local police department
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- Commercial Alarm System
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**935 CMR 500.101(9)(f)(ii).** Information adequate to demonstrate that the location will be maintained securely;

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- Rigorous inventory reconciliation procedures (as required by 935.CMR.101 and internal accounting and inventory management protocol/SOPS)
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# Community Impact Plan Proposal



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- Dedicate ~ 1/2 acre of land for food production and donate harvest to local food groups, community centers, and food service professionals (\$15-20K retail value).
- To be conducted outside of our cannabis licensed “canopy”
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**935 CMR 500.101(9)(f)(v).** Information adequate to demonstrate that the location will not constitute a nuisance as defined by law;



# Statement that location will not be a nuisance as defined by law

- ZGC will abide by all necessary local and state laws as required by the Town of Sheffield and in accordance with MA G.L. Chapter 139 “Common Nuisances”
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- ZGC will not have loud operating equipment or processes during the course of regular business hours throughout the year.
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# ZGC LLC FOUNDING TEAM

Zack Ahrens



## Operations/Compliance

Zack has 5+ yrs of experience in the cannabis industry as a consultant and working for the #1 flower processing, branding and distribution company in California ("CA"). He has launched or developed over 20 unique cannabis products, and worked with numerous top tier brands. He holds an MBA in Sustainable Management.

Greg Cohen



## Biz. Dev / Fundraising

Greg brings 25+ yrs years of experience in real estate acquisition, development and general contracting. He has overseen dozens of multi-million-dollar projects in real estate and at early stage, high -growth companies. For the last 5 yrs he has been deeply involved in large scale cannabis & hemp processing operations across the United States.

Chris Regan



## Farm Operations

Chris has over 2 decades of regenerative / organic farming experience in Western, MA and NY. For the past 5 years he has been cultivating and working with industrial hemp and cannabis. Chris is responsible for the success of the harvest, breeding unique genetics and overseeing all aspects of farm operations.



# Questions



**For more information please contact:**  
[greg@vodahemp.com](mailto:greg@vodahemp.com) or [zack@zackahrens.com](mailto:zack@zackahrens.com)

ZGC LLC

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RE: Marijuana Establishment Tier-1 Outdoor Cultivation (100,000 sqft)

**PLAN FOR POSITIVE IMPACT  
FOR ZGC LLC  
TIER-11, OUTDOOR CULTIVATION**

**Summary:**

ZGC is located in the far southwest corner of the state and is quite distant from any of the geographic areas that qualify as “Disproportionately Affected” as defined by law. It is, however, the plan of ZGC to engage with and assist a Boston based non-profit by the name of Boston Area Gleaners who provides hunger relief services to communities located in Census Tract 101102 (an area identified as disproportionately impacted) for the purposes established in M.G.L. c. 94G, § 4(a½)(iv) as well as Lowell, Lynn, Revere, and Brockton.

ZGC is primarily a farm that hopes to use its operational efforts to assist other farmers and organizations in the farm community. The mission of the Boston Area Gleaners (‘BAG’) is to support an equitable, just, and sustainable local food system and is a natural partner for ZGC to partner with on this plan for positive impact.

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

- ZGC states that any actions taken, or programs instituted, by the ZGC (“applicant”) will not violate the Commission’s regulations with respect to limitations on ownership or control or other applicable state laws.
- ZGC has will attach a signed letter from BAG stating that they have been notified of ZGC’s intentions sponsor their programs and donate time and services to help them achieve their mission;

**Goals:**

1. To donate two days per year (or, 16 working hour per year) per employee to assist BAG collect and distribute food to their recipients in the areas of economic impact listed.
2. To donate \$10,000 to BAG through their corporate sponsorship program on an annual basis.

**Programs:**

1. ZGC will give each employee at the company two paid days off per year to volunteer with BAG. The programs will likely be helping BAG during harvest days, during the harvest seasons and participate in sorting, bagging, packaging, weighing transporting and catalogue various harvests and getting the produce / fruits to ready what was collected for distribution to BAG’s recipient network.

ZGC LLC “ZGC”

Cannabis Control Commission “CCC” Applicant

Updated: 01.07.21

2. ZGC will donate to BAG annually at their corporate sponsorship level to ensure that monies are going to achieving their mission in a way that BAG and their Board of Directors sees fit.

**Measures:**

#	Goal & Measurement
1	<p>Each employee of ZGC will write a 1-page summary of the work they did during each of their two paid days off and record which farm they helped, who the recipient of the produce was, the amount of produce harvested in appropriate units and dollar amount and donated and identify the other channels the produce was destined for.</p> <p>ZGC anticipates having about 8 full time employees in the first year, which equates to over 100 hours in the first year, donated to BAG and their affiliate networks. Each year, as ZGC grows, donation hours will also increase to BAG.</p>
2	<p>ZGC will help support BAG’s mission and the monetary donation will be made each calendar year with a report from BAG’s leadership team on the use of proceeds and how it helped their donor recipient network of farmers, food pantry’s, and distribution hubs.</p>





William Francis Galvin  
Secretary of the  
Commonwealth

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

December 3, 2020

TO WHOM IT MAY CONCERN:

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

**ZGC LLC**

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **November 19, 2020.**

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

I also certify that the names of all managers listed in the most recent filing are:  
**ZACHARY DAVID AHRENS, GREGORY DAVID COHEN, CHRISTOPHER REGAN**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **ZACHARY DAVID AHRENS, GREGORY DAVID COHEN, CHRISTOPHER REGAN**


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

In testimony of which,

I have hereto affixed the

Great Seal of the Commonwealth

on the date first above written.



*William Francis Galvin*

Secretary of the Commonwealth





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

mass.gov/dor

Letter ID: L1199526208  
Notice Date: December 7, 2020  
Case ID: 0-000-913-556



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



ZACK  
ZGC LLC  
200 HIGHLAND AVE STE 401  
NEEDHAM MA 02494-3037

### *Why did I receive this notice?*

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

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

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

### *What if I have questions?*

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 9:00 a.m. to 4:00 p.m..

### *Visit us online!*

Visit [mass.gov/dor](http://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**  
**William Francis Galvin**

Minimum Fee: \$500.00

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

**Certificate of Organization**

(General Laws, Chapter )

**Identification Number:** 001469218

**1. The exact name of the limited liability company is:** ZGC LLC

**2a. Location of its principal office:**

No. and Street: 200 HIGHLAND AVENUE  
SUITE 401  
 City or Town: NEEDHAM State: MA Zip: 02494 Country: USA

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

No. and Street: 200 HIGHLAND AVENUE  
SUITE 401  
 City or Town: NEEDHAM State: MA Zip: 02494 Country: USA

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

THE PRIMARY CHARACTER OF THE BUSINESS OF ZGC LLC IS FOR APPLYING FOR A LICENSE WITH THE MASSACHUSETTS CCC.

**4. The latest date of dissolution, if specified:**

**5. Name and address of the Resident Agent:**

Name: ZACHARY AHRENS  
 No. and Street: 200 HIGHLAND AVENUE  
SUITE 401  
 City or Town: NEEDHAM State: MA Zip: 02494 Country: USA

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	ZACHARY DAVID AHRENS	200 HIGHLAND AVENUE NEEDHAM, MA 02494 USA
MANAGER	GREGORY DAVID COHEN	200 HIGHLAND AVENUE



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

<b>Title</b>	<b>Individual Name</b> First, Middle, Last, Suffix	<b>Address</b> (no PO Box) Address, City or Town, State, Zip Code
SOC SIGNATORY	ZACHARY DAVID AHRENS	200 HIGHLAND AVENUE NEEDHAM, MA 02494 USA

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

<b>Title</b>	<b>Individual Name</b> First, Middle, Last, Suffix	<b>Address</b> (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	ZACHARY DAVID AHRENS	200 HIGHLAND AVENUE NEEDHAM, MA 02494 USA

**9. Additional matters:**

NONE.

**SIGNED UNDER THE PENALTIES OF PERJURY, this 19 Day of November, 2020,**  
ZACHARY AHRENS

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

THE COMMONWEALTH OF MASSACHUSETTS

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

November 19, 2020 06:50 PM

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

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*

**LIMITED LIABILITY  
COMPANY OPERATING  
AGREEMENT  
OF  
ZGC LLC**

This Limited Liability Company Operating Agreement (the “Agreement”) of ZGC LLC (the “Company”) is made, entered into and effective as of December 01<sup>st</sup>, 2020, by Chris Regan, Zack Ahrens and Greg Cohen, as the sole members (the “Members”).

WITNESSETH:

WHEREAS, the Members desire to form a limited liability company pursuant to the provisions of the Massachusetts Limited Liability Company Act, as amended (the “Act”).

NOW, THEREFORE, the Members hereby create a limited liability company for the purposes and on the terms set forth in this Agreement.

**ARTICLE I  
ORGANIZATION**

1.1. Formation of the Company. An authorized representative of the Members has executed and caused to be filed with the Secretary of State of the State of Massachusetts the Certificate of Organization (the “Certificate”) of ZGC LLC on November 19<sup>th</sup>, 2020 in order to form a limited liability company pursuant to the Act.

1.2. Office of the Company. The Company shall have its principal office at 200 Highland Avenue, Needham, MA 02494 and may establish such other offices or places of business for the Company as the Members may deem appropriate.

1.3. Registered Office and Registered Agent. The Company shall have its registered office in the State of Massachusetts at 200 Highland Avenue, Needham, MA 02494. The name of its registered agent for service of process in the State of Massachusetts at such address is Zack Ahrens.

1.4. Purposes of the Company. The purposes of the Company shall be to engage in any lawful businesses that the Company may decide to undertake. The Company shall have all powers necessary and appropriate for the accomplishment of such purposes that are conferred upon limited liability companies under the Act.

1.5. Term of the Company. The existence of the Company shall commence as of the date that the Certificate is filed with the Secretary of State of the State of Massachusetts and shall continue until dissolution thereof in accordance with the provisions of the Certificate

or this Agreement.

1.6. Name of the Company. The name of the Company formed hereby is ZGC LLC. The business of the Company may be conducted upon compliance with all applicable laws, under any other name designated by the Members; provided that such name contains the words "Limited Liability Company" or the abbreviation "L.L.C." or the designation "LLC".

## ARTICLE II MANAGEMENT OF COMPANY

2.1. Management. The full and exclusive right, power and authority to manage the Company is retained by, and reserved to, the Members. Nothing in this Agreement shall be deemed to designate or appoint, or authorize the designation or appointment, of any "managers" as such term is defined in the Act. The business and affairs of the Company shall be conducted, and its capital, assets and funds shall be managed, dealt with and disposed of, and all decisions to be made by the Members shall be made solely by the Members. The affirmative vote, approval or consent of all of the Members shall be required to decide any matter connected with the business or affairs of the Company.

2.2. Officers. (a) The Members may, from time to time, designate one or more persons to be officers of the Company. No officer need be a resident of the State of Massachusetts. Any officers so designated shall have such authority and perform such duties as the Members may, from time to time, delegate to them. The Members may assign titles to particular officers. Unless the Members decide otherwise, if the title is one commonly used for officers of a business corporation formed under the Massachusetts Business Corporation Act (the "MBCA"), the assignment of such title shall constitute the delegation to such officer of the authority and duties that are normally associated with that office, subject to any restrictions on such authority imposed by the Members. Any number of offices may be held by the same person. Any delegation pursuant to this Section 2.4 may be revoked at any time by the Members.

(b) Each officer shall hold office until his or her successor shall be duly designated and qualified or until his or her death or until he or she shall resign or shall have been removed in the manner hereinafter provided.

(c) Any officer may resign as such at any time. Such resignation shall be made in writing and shall take effect at the time specified therein, or if no time is specified, at the time of its receipt by the Members. The acceptance of a resignation shall not be necessary to make it effective, unless expressly so provided in the resignation.

(d) Any officer may be removed as such, either with or without cause, by the Members at any time. Any vacancy occurring in any office of the Company may be filled by the Members.

2.3. Certain Transactions. The fact that the Members or any of their affiliates is directly or indirectly interested in or connected with any person, firm or

corporation employed by the Company to render or perform a service, or from which or to whom the Company may buy or sell any property, shall not prohibit the Company from employing or dealing with such person, firm or corporation.

### ARTICLE III CAPITAL CONTRIBUTIONS; DISTRIBUTIONS; TRANSFER OF MEMBERSHIP INTERESTS

3.1 Initial Capital Contribution; Membership Interests. The Members shall make initial capital contributions of capital to the Company (each, a “Capital Contribution”) on the date hereof, in the amount shown on Schedule B to this Agreement and the Members shall hold interest in the Company (the “Membership Interest”) in the amount shown on such Schedule B.

3.2 Additional Capital Contributions. Except as otherwise provided in this Section 3.2, the Members shall not be obligated or permitted to make any additional contribution to the capital of the Company. If additional Capital Contributions are called for, the Members shall make additional Capital Contributions at such times and in such amounts as may be determined by the Members.

3.3 Capital Accounts. The Company shall maintain a capital account (the “Capital Account”) for each of the Members that shall consist of (a) the sum of (i) such Member’s Capital Contributions paid to the Company as of any given time, (ii) the portion of the Company’s net income allocated to the Members pursuant to Section 4.2, and (iii) the amount of any Company liabilities assumed by such Members, less (b) the sum of (A) the portion of the Company’s net loss allocated to the Members pursuant to Section 4.2, (B) all distributions made by the Company to the Members pursuant to Sections 3.6 and 5.3, and (C) the amount of such Members liabilities assumed or paid by the Company by action of the Members.

The foregoing provisions and the other provisions of this Agreement relating to the maintenance of Capital Accounts are intended to comply with Treasury Regulations under Section 704(b) of the Code, and to the extent not inconsistent with the provisions of this Agreement, shall be interpreted and applied in a manner consistent with such Treasury Regulations.

3.4 Return of Capital. Except upon the dissolution of the Company as provided in Section 5.1 herein, the Members shall not have the right to withdraw from the Company or to demand or to receive the return of all or any part of their Capital Account or their Capital Contributions to the Company.

3.5 No Interest on Capital Contribution. The Members shall not be paid interest on any of their Capital Contributions or on their Capital Account.

3.6 Distributions. Distributions shall be made to the Members at the times and in the aggregate amounts determined by the Members. Distributions may be made in cash or in-kind. The Members may reserve amounts for anticipated expenses or contingent liabilities

of the Company.

3.7 Transfer of Membership Interests. Notwithstanding anything in this Agreement to the contrary, no Member may transfer, sell, pledge, hypothecate, or otherwise dispose of or encumber all or any part of its Membership Interest without the prior consent in writing of the Members, except to a Permitted Transferee. "Permitted Transferee" means: (1) the spouse of the Member; (2) a corporation, limited liability company or other entity in which, in any case, all of the equity interests are owned by the transferring Member; (3) if the Member is an individual, that Member's probate estate upon the Member's death; and (4) if the Member is a corporation or limited liability company, the sole shareholder of the corporation or sole member of the limited liability company.

#### ARTICLE IV ALLOCATIONS

4.1 Calculation of Profits and Losses. The profits and losses of the Company shall be determined for each fiscal year in accordance with U.S. generally accepted accounting principles.

4.2 Allocation of Profits and Losses. (a) Except as otherwise set forth in this Section 4.2, for Capital Account purposes, all items of income, gain, loss and deduction shall be allocated to the Members in a manner such that if the Company were dissolved, its affairs wound up and its assets distributed to the Members in accordance with their respective Capital Account balances immediately after making such allocation, such distributions would, as nearly as possible, be equal to the distributions that would be made pursuant to Section 5.3.

(b) For federal, state and local income tax purposes, items of income, gain, loss, deduction and credit shall be allocated to the Members in accordance with the allocations of the corresponding items for Capital Account purposes under this Section 4.2, except that items with respect to which there is a difference between tax and book basis will be allocated in accordance with Section 704(c) of the Code, the Treasury Regulations thereunder, and Treasury Regulations Section 1.704-1(b)(4)(i).

(c) Notwithstanding any provision set forth in this Section, no item of deduction or loss shall be allocated to the Members to the extent the allocation would cause a negative balance in such Member's Capital Account (after taking into account the adjustments, allocations and distributions described in Treasury Regulations Sections 1.704-1(b)(2)(ii)(d)(4), (5) and (6)) that exceeds the amount that such Members would be required to reimburse the Company pursuant to this Agreement or under applicable law.

(d) In the event the Members unexpectedly receives any adjustments, allocations, or distributions described in Treasury Regulations Sections 1.704-1(b)(2)(ii)(d)(4), (5) and (6), items of the Company's income and gain shall be specially allocated to such Members in an amount and manner sufficient to eliminate as quickly as possible any deficit balance in their Capital Account in excess of that permitted under Section 4.2(c) created by such adjustments, allocations or distributions. Any special allocations of items of income or gain pursuant to this Section 4.2(d) shall be taken into account in computing subsequent allocations pursuant to this Section 4.2 so that the net amount of any items so allocated and all

other items allocated to the Members pursuant to this Section 4.2 shall, to the extent possible, be equal to the net amount that would have been allocated to each such Members pursuant to the provisions of this Section 4.2 if such unexpected adjustments, allocations or distributions had not occurred.

## ARTICLE V DISSOLUTION AND TERMINATION OF THE COMPANY

5.1 Events Causing Termination. The Company shall be dissolved and its affairs shall be wound up upon the first occurrence of any of the following: (a) termination hereof by the Members; (b) in the event that at any time prior to December 31, 2021 the Members fail to agree on any matter connected to the business and affairs of the Company, upon the written request for termination and dissolution by any Member delivered to the other Members; or (c) the occurrence of any of the events set forth in Section 43 of the Act that affects the Members and thereby results in the dissolution of the Company.

5.2 Winding Up. Upon dissolution of the Company, the Members shall proceed diligently to wind up the affairs of the Company and distribute its assets.

5.3 Liquidation and Termination. Upon dissolution of the Company, as expeditiously as is reasonable, the Members shall pay the liabilities of the Company and make distributions in the following manner and order: (i) to creditors, including any Member, if such Member is a creditor to the extent otherwise permitted by law, in satisfaction of liabilities of the Company (whether by payment or by establishment of reserves); and (ii) to the Members, first in accordance with their respective Capital Account balances and then in proportion to their respective Membership Interests. At such time as the distributions provided for in (i) and (ii) above have been made, the Company shall terminate.

5.4 Accounting on Liquidation. Upon liquidation, a proper accounting shall be made by the Company's accountants of the Company's assets, liabilities and results of operations through the last day of the month in which the Company is terminated.

## ARTICLE VI COMPANY EXPENSES, BOOKS AND RECORDS

6.1. Operating Expenses. The Company shall pay all current expenses, including administrative expenses and fees, before any allocations may be made to the Members. Appropriate reserves may be determined and charged to the capital accounts of the Members (in accordance with generally accepted accounting principles) for contingent liabilities, if any, as of the date any such contingent liabilities become known to the Members.

6.2. Fiscal Year and Method of Accounting. The Company shall select the appropriate method of accounting and the beginning and end of its fiscal year (except for the first fiscal year of the Company, which shall begin on the date of this Agreement).

6.3. Records. The books and records of the Company shall be maintained at the principal office and place of business of the Company.

6.4. Financial Statements and Reports. The Members shall oversee the accounting, tax and record keeping matters of the Company.

## ARTICLE VII LIABILITY AND INDEMNIFICATION

7.1. (a) Liability to Company. Neither the Members, nor any employee, director, officer, agent, shareholder, limited partner or general partner of the Members, shall be liable, responsible or accountable in damages or otherwise to the Company by reason of acts, omissions or errors in judgment. Notwithstanding any of the foregoing to the contrary, the provisions of this Section 7.1 shall not be construed so as to relieve (or attempt to relieve) a person of any liability, to the extent (but only to the extent) that such liability may not be waived, modified or limited under applicable law, but shall be construed so as to effectuate the provisions of this Section 7.1 to the fullest extent permitted by law.

(b) No Personal Liability of the Members. The Members shall not be subject in such capacity to any personal liability whatsoever to any person in connection with the Company assets or the acts, obligations or affairs of the Company. The Members shall have the same limitation of personal liability as is extended to stockholders of a private corporation for profit incorporated under the MBCA. The rights accruing to the Members under this Section 7.1 shall not exclude any other right to which such Members may be lawfully entitled, nor shall anything herein contained restrict the right of the Company to indemnify or reimburse the Members in any appropriate situation even though not specifically provided herein.

(c) Liability to Third Parties. Except as provided in this Section 7.1, neither the Members nor any employee, director, officer, agent, shareholder, limited partner or general partner of the Members of the Company in his or her capacity as such shall be liable under a judgment, decree, or order of a court, or in any other manner, for any debt, obligation or liability of the Company.

7.2. Indemnification. To the fullest extent permitted by law, the Company shall indemnify, defend and hold harmless the Members of the Company and each employee, director, officer, agent, shareholder, limited partner and general partner of the Members (each, an “Indemnified Person”) from and against any loss, liability, damages, cost or expense (including legal fees and expenses and any amounts paid in settlement) (each a “Loss” and collectively “Losses”) resulting from a claim, demand, lawsuit, action or proceeding by reason of any act or omission performed or omitted by such Indemnified Person on behalf of the Company in a manner reasonably believed to be within the scope of the authority conferred on such Indemnified Person by this Agreement; provided that no indemnification shall be provided for any Indemnified Person with respect to any matter as to which they shall have been adjudicated in any proceeding not to have acted in good faith in the reasonable belief that their action was in the best interest of the Company.. Expenses, including legal fees, incurred by an Indemnified Person and relating to any claim, demand, lawsuit, action or proceeding for which



indemnification is sought under this Section shall be paid by the Company upon demand by the Indemnified Person; provided that the Indemnified Person shall reimburse the Company for such expenses if it is ultimately determined that such Indemnified Person is not entitled to indemnification hereunder.

## ARTICLE VIII GENERAL PROVISIONS

8.1. Amendments to this Agreement. The terms and provisions of this Agreement may be modified or amended at any time and from time to time by the written consent of the Members.

8.2. Entire Agreement. This Agreement supersedes all prior agreements with respect to the subject matter hereof. This instrument contains the entire agreement with respect to such subject matter. This instrument may not be amended, supplemented or discharged, and no provision hereof may be modified or waived, except expressly by an instrument in writing signed by the Members. No waiver of any provision hereof shall be deemed a waiver of any other provision nor shall any such waiver by any party be deemed a continuing waiver of any matter. No amendment, modification, supplement, discharge, or waiver hereof or hereunder shall require the consent of any person not a party to this Agreement.

8.3. Notices. Unless otherwise specified herein, all notices, consents, approvals, reports, designations, requests, waivers, elections and other communications (collectively, "Notices") authorized or required to be given pursuant to this Agreement shall be given in writing, shall be either personally delivered to the Members to whom it is given or delivered by an established delivery service by which receipts are given or mailed by first-class mail, postage prepaid, or sent by facsimile or electronic mail, addressed to the Members at the addresses indicated on Schedule A (or at such other address for a Members as shall be specified by like notice).

All notices, other communications or documents shall be deemed to have been duly given: (i) at the time delivered by hand, if personally delivered; (ii) when receipt is acknowledged in writing by addressee, if by facsimile transmission or electronic mail; (iii) five (5) business days after having been deposited in the mail, postage prepaid, if mailed by first class mail; and (iv) on the first business day with respect to which a reputable air courier guarantees delivery; provided, however, that notices of a change of address shall be effective only upon receipt.

8.4. Governing Law. THIS AGREEMENT SHALL BE GOVERNED AND CONSTRUED IN ACCORDANCE WITH THE LAWS OF THE STATE OF MASSACHUSETTS, WITHOUT REGARD TO THE CONFLICTS OF LAW PRINCIPLES THEREOF.

8.5. Future Actions. The Company and the Members shall execute and deliver all such future instruments and take such other and further action as may be reasonably necessary or appropriate to carry out the provisions of this Agreement.

8.6 Limitation on Rights of Others. None of the provisions of this Agreement, including Section 3.2, shall be for the benefit of or enforceable by any creditor of the Company. Furthermore, the Members shall not have any duty or obligation to any creditor of the Company to make any contribution to the Company or to issue any call for capital pursuant to this Agreement. Nothing in this Agreement shall be deemed to create any legal or equitable right, remedy or claim in any person not a party hereto (other than an Indemnified Person).

8.7 Successors and Assigns. This Agreement shall be binding upon and inure to the benefit of the Members and their respective successors and permitted assigns.

IN WITNESS WHEREOF, the undersigned Members have executed this  
Limited Liability Company Operating Agreement as of the date first above written.

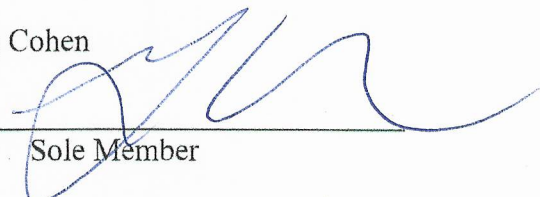
Chris Regan

By:   
Sole Member

Zack Ahrens

By:   
Sole Member

Greg Cohen

By:   
Sole Member

SCHEDULE A

NAME AND ADDRESS OF  
MEMBERS

<u>Name</u>	<u>Address</u>
Chris Regan	1121 Boston Corners Rd. Millerton, NY 12546
Zack Ahrens	80 Rawson Rd Arlington, MA 02474
Greg Cohen	874 Commonwealth Ave. Newton, MA 02549- 1041

SCHEDULE B

CAPITAL CONTRIBUTION AND  
MEMBERSHIP INTEREST OF MEMBERS

<u>Name</u>	<u>Amount of Capital Contribution</u>	<u>Membership Interest</u>
Chris Regan	\$10.00	33.333%
Zack Ahrens	\$10.00	33.333%
<u>Greg Cohen</u>	<u>\$10.00</u>	<u>33.333%</u>

**ATTESTATION REGARDING  
CERTIFICATE OF GOOD STANDING  
FROM  
DEPARTMENT OF UNEMPLOYMENT ASSISTANCE**

ZGC LLC, an applicant for Tier-11 Cannabis Cultivation (Outdoor) license (“the Applicant”) cannot receive a certificate of good standing from the Department of Unemployment Assistance that is dated within 90 days of the date the Management and Operations Profile was originally submitted to the Cannabis Conservation Commission (“CCC”) because the Applicant cannot register with the department until hiring employees. (Required for all applications submitted on or after November 1, 2019) *935 CMR 500.101(1)*

**Authorized Representative of ZGC LLC:** Zachary Ahrens

1. I, the above identified individual, attest that ZGC LLC cannot receive a certificate of good standing from the Department of Unemployment Assistance because we have not hired any employees yet.
2. I, the above identified individual, attest that ZGC LLC will notify the CCC when any employees are hired and submit a certificate of good standing from the Department of Unemployment Assistance, as soon as is possible.

I affirm that all the information provided within this attestation is true and accurate. I further affirm that all required attestations written above have been made voluntarily, and by signing below, certify that I do in fact make these true and accurate attestations.

**Authorized Representative Signature:** \_\_\_\_\_



Zack Ahrens  
Founder, ZGC LLC  
Date: 01.01.21

ZGC LLC  
Business Plan  
Prepared for the CCC



High Quality Sun Grown Ingredients for the MA Market  
December, 2020



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## Executive Summary

ZGC's approach to the market is simple –good soil health (through regenerative farming practices) and land stewardship, produces healthy and flavorful plants that allow brands, dispensaries, and manufacturing operators to make exceptional cannabis products. ZGC will grow high-quality cannabis in the fertile soils of Western, MA and sell wholesale ingredients to other licensed operators in the state. In doing so, ZGC seeks to expand the knowledge base of consumers and buyers with regards to what high quality cannabis, grown in the outdoors, looks and tastes like. This approach to the market is not new (outdoor cultivation is done in mature cannabis markets across the country), yet only 10% of the licensed cultivators are classified as outdoor (as of time of writing) in Massachusetts (“MA”).

In the absence of a federally recognized organic farming certification for cannabis growers, ZGC will implement the necessary operating protocols to obtain the Sun + Earth Certification – a beyond organic / regenerative farming criteria that measure's a farms approach to soil health, their hiring practices, and how they engage with the local community. And, if possible, label products as Organic according to 935 CMR 500 and other MA labeling requirements.

ZGC is applying for a Tier-11 license w/ the Cannabis Control Commission (“CCC”) and is poised to scale as a responsible and values driven business - but also as a new, authentic and high-quality ingredients provider and craft flower producer. ZGC expects that this approach to cannabis production will resonate with brands looking to connect with the modern consumer – someone who is curious about where their products come from and cares about the quality of ingredients that are in the products they put in their body.

## Business Overview

ZGC is registered as a Limited Liability Corporation in the state of Massachusetts, with three founding members:

1. Zachary Ahrens
2. Greg Cohen
3. Chris Regan

As stated above, ZGC is applying for a Tier-11 Outdoor Cultivation license to produce wholesale cannabis ingredients. ZGC seeks to be operational by Spring or Summer 2021, with a first harvest of Fall 2021.

### Mission Statement:

ZGC's mission is to legitimize and expand the "Sun Grown" cannabis product category in the Massachusetts market by growing and supplying high-quality cannabis ingredients for wholesale buyers.

### Values:

- 1) **Land Stewardship & Sustainability** – Quality ingredients start w/ quality soil – a focus of ZGC is on soil health for healthy cannabis plants. Nutrient dense soil with the full light spectrum of the sun help cannabis plants express their full range of oils which translates to exceptional flavor and an enjoyable consumer experience. ZGC will supplement electricity-use on-site solar panels as soon as is financially feasible after the start-up period. ZGC will also document waste outputs (by volume and weight) and associated Scope 1, 2, & 3 emissions from across the value chain as defined by Greenhouse Gas Protocols<sup>1</sup>.
- 2) **Livable Wages** – Farmers and our work force deserve their share of value from the products created with the crops they grow – that is why ZGC is committed to providing livable wages<sup>2</sup> for all who work at within the company. This is especially true for people hired from communities classified as disproportionately impacted as defined by the CCC.
- 3) **Education** – Not only does ZGC wish to educate buyers on the qualities of regenerative grown cannabis but also to destigmatize cannabis by teaching consumers and community groups that cannabis is like any other agricultural crop.

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<sup>1</sup> [https://ghgprotocol.org/sites/default/files/standards\\_supporting/FAQ.pdf](https://ghgprotocol.org/sites/default/files/standards_supporting/FAQ.pdf)

<sup>2</sup> <https://livingwage.mit.edu/counties/25003> - ZGC livable wage assessment use Massachusetts Institute of Technology "livable wage calculator" as guidance in wage determination.

## Wholesale Products:

ZGC will sell produce and sell two main categories of product for the wholesale market; the first is bulk and the second is white label packaged flower goods.

ZGC Ingredients Spec Sheet	
Bulk Ingredients	
Fresh Frozen	Ingredients for extracted oil – concentrates, vape, edibles, tinctures
Sorted & Graded Flower	Sorted, hand-trimmed, tested and graded flower for wholesale.
Smalls / Trim	By-product of the trimming / sorting process will be sold to interested buyers or re-purposed into pre-roll forms.
Packaged Goods – In accordance with all relevant sections and subsections of 935 CMR 500.105.	
Jars	Sorted and hand manicured flower buds. Primary form factor will be eighths (3.5g/jar), but grams (1.0g), quarters (7.0g) and other sizes are possible with minimal operational variance for established white-label buyers/brands.
Pre-Rolls	High quality, low-volume pre-rolls from ground “smalls” material will be available for established white-label buyers/brands.

## Target Customers

Manufacturing Operators	Extraction specialists looking for high quality trim or fresh-frozen for product lines.
Dispensary Groups	Groups with establish flower lines looking to supplement their flower selection or add another tier to their existing product lines..
Product Manufacturers	Makers of high-quality edibles, tinctures and other ingestible products that want THC/CBD oil ingredients that are brand aligned.
Wholesale Buyers	Other buyers and sellers of cannabis goods can buy from ZGC in the event of a surplus on the wholesale / brokerage market.
3 <sup>rd</sup> Party Brands / MSO's	Pre-qualified aligned brands with product specifications in place can buy from ZGC on a contract supply basis. ZGC has numerous nationwide contacts to leverage for MSO's interested in expanding into the MA market.

## Site Overview

ZGC has located an ideal parcel to begin operations in Sheffield, MA. The property is located on the southern edge of town in a rural district – the land is undeveloped and consists of approximately an 18-acre field on a flat plane – ideal for outdoor farming operations.

The soil is a favorable mix of peaty loam and with good PH levels that are amiable to cannabis plants. ZGC will conduct all cannabis farming operations within a secure perimeter as required by 935 CMR 500.110 and other applicable laws, with plenty of space to host a ½ acre community garden and food donation program (outside of the licensed area) as part of the company's community give back program.

To have food production next to cannabis production helps ZGC to destigmatize the cannabis plant and position the crop as another agricultural product. This will be a large part of our community improvement plan and education in the local community with regards to ZGC's operations and approach to production.

## Operations & Management Overview

### Farm Operations - Sun & Earth Certification<sup>3</sup>



- ZGC will get a Sun + Earth certification to ensure their wholesale ingredients and their farm business operations uphold the highest standards of quality, respect for the land and the people that work it.
- Sun + Earth certification was developed in the absence of a federally recognized “organic” certification for cannabis farmers. Unlike other certifications for cannabis, Sun + Earth works to certify farms that are grown under the sun, in the soil of mother earth, without chemicals by fairly paid farmers.

### The Three Pillars of Sun+Earth Certification



1

EARTH CARE & CULTIVATION



2

HUMAN EMPOWERMENT



3

COMMUNITY ENGAGEMENT

1. **Earth Care & Cultivation** - For crop production, this means building soil quality through mulching, crop rotation, and reducing tillage “regenerative farming”
2. **Human Empowerment** – In addition to measuring the soil as regenerative the certification examines a farm business from a social lens to ensure all workers are treated fairly
3. **Community Engagement** – The standards, include language that requires the farm to engage their local community with greater focus and intention.

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<sup>3</sup> <https://sunandearth.org/>

## **Security**

Security is of the utmost importance to ZGC and they seek to follow all requirements as set forth in 935 CMR 500.101(9)(f)(ii) and other applicable sections to prevent diversion to minors and ensure the safety is maintained in the community in which they operate

### **Security Features and Protocols**

- Employee Protocols
  - No “Drop-In” Policy – Pre-approved guests only
  - Check -In / Check Out Policy – Designated employee to greet visitors and keep a visitor log.
  - Daily visual inspections of permitter w/ daily entry record keeping
  - Safety training for all employees (including CPR).
- Secure fenced in permitter
  - Motion sensor lights
  - Daily visual inspection
- Limited employee access to storage facilities (all cannabis storage will be mechanically secure and under surveillance as required by 935 CMR 500.101)
- Police cooperation, ZGC will confirm and review plans with the local police department on a regular basis
- Commercial Alarm System Features
  - 24/7 Security / Surveillance
  - Commercial Video Surveillance
  - Access Control Systems
  - Remote Monitoring Capabilities

### **Harvest Production & Yield Forecasts**

100,000 square foot license canopy space can be utilized in a lot of ways. Initial planning and expense forecasting/budgeting show ZGC growing in 3 x 100’ hoop houses for shoulder season weather protection with a remainder of the crop being planted in the ground outside.

Final yields will depend on a multitude of factors, such as;

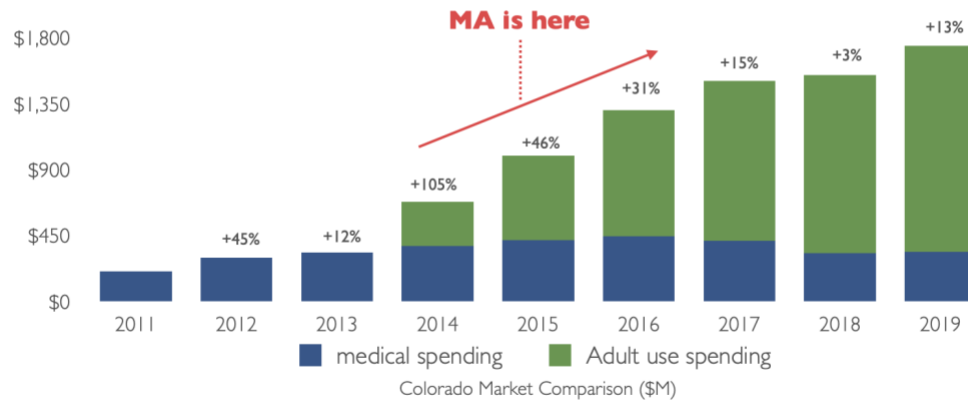
- final genetics selected and timing of nursery activation;
- seasonal weather;
- processing loss

A blended strategy and with consideration for the above factors, ZGC expects to yield over 5,000 lbs. to bulk sales for extraction products and just over 600 lbs. for flower, smalls/trim, and packaged flower goods sales.

## Market Overview

### Massachusetts - Ready for growth

Perfect timing



ZGC LLC  
PROPRIETARY & CONFIDENTIAL  
DEC, 2020

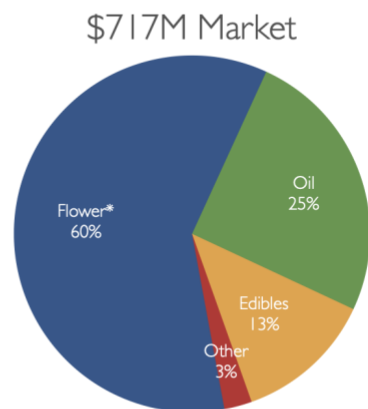
Source: Adapted from Arcview Market Research BDSA (November, 2020 Webinar)

**Figure 1:** Showcase Colorado – comparable in population size to Massachusetts – they are currently over \$1.5B in annual sales. MA went recreational 2 year ago and is about to experience hypergrowth as more license come online and existing operators stabilize their operations.

### Why Outdoor NOW in MA?

#### Market Conditions

- Immature market
- Supply shortage
- High spot market pricing
- Limited outdoor cultivation

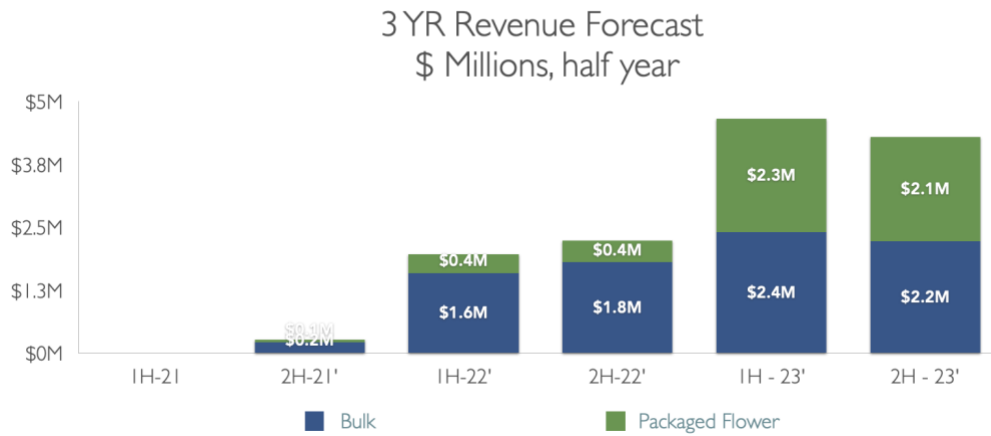


\*Flower includes pre-rolls  
Source: (BDSA Analytics, 12,2020)

**Figure 2:** Compelling market potential in all categories for outdoor cultivation.



## Financials



**Figure 3:** Sales forecast

### Notes

- Flower volume goes up x3 after 1st harvest w/ more hoop house production
- Price drops at end of 2022 (assuming more supply in market)
- Sales mix increases to more packaged goods (over time) w/ higher margins
- Bulk stays constant but is a lower overall % of the mix as flower sales grow

## Profit & Loss Forecast

	2021 1st Half (1H)	2021 2nd Half (2H)	2022 (1H)	2022 2H	2023 1H	2023 2H
Bulk	\$0	\$216,563	\$1,588,125	\$1,804,688	\$2,403,375	\$2,218,500
Packaged Flower	\$0	\$51,075	\$374,550	\$425,625	\$2,257,515	\$2,083,860
TOTAL REVENUE	\$0	\$267,638	\$1,962,675	\$2,230,313	\$4,660,890	\$4,302,360
TOTAL COGS	\$0	\$54,008	\$396,061	\$450,069	\$1,053,433	\$972,400
PROFIT	\$0	\$213,629	\$1,566,614	\$1,780,243	\$3,607,457	\$3,329,960
Opex						
Salary + Labor	\$75,000	\$180,000	\$219,000	\$219,000	\$219,000	\$219,000
Farm Expenses	\$77,667	\$56,000	\$135,667	\$154,167	\$84,167	\$110,000
Overhead	\$59,500	\$132,000	\$97,500	\$137,500	\$124,500	\$102,000
TOTAL OPEX	\$212,167	\$368,000	\$452,167	\$510,667	\$427,667	\$431,000
OP. PROFIT/LOSS	(\$212,167)	(\$154,371)	\$1,114,447	\$1,269,576	\$3,179,790	\$2,898,960
Op. Margin (%)	\$0	-58%	57%	57%	68%	67%
CAPEX / START-UP	\$10,000	\$847,222	\$87,222	\$262,222	\$87,222	\$15,000
TOTAL EBITDA	(\$222,167)	(\$1,001,593)	\$1,027,225	\$1,007,354	\$3,092,568	\$2,883,960
TOTAL TAX	\$18,750	\$53,850	\$197,146	\$195,557	\$543,164	\$290,467
NET INCOME	(\$240,917)	(\$1,055,443)	\$830,079	\$811,797	\$2,549,404	\$2,593,494

## Team

### Pillars of Experience

- Cannabis Processing Operations - Founder level experience, scaling one of the largest automated flower processing/packaging operations in California - the biggest and most competitive cannabis market in the nation
- Sustainable Farming/Business Expertise – Over 2 decades of sustainable farming expertise and sustainable business experience across domestic and international companies.
- Early-Stage Start-Up Veterans – Over 3 decades of combined experience building & scaling companies in agriculture, clean-tech, food and real estate sectors.

## Founding Team



**Zack Ahrens**  
Operations/Compliance

Zack has +10 yrs experience in resource planning, business goal refinement, and operations experience in food, agricultural and sustainability sectors. For the past 5 yrs he has been deeply immersed in the cannabis industry as a consultant and working for the #1 flower processing, branding and distribution company in California ("CA"). He has launched or developed over 20 unique cannabis products, and worked with numerous top tier brands. He holds an MBA in Sustainable Management.



**Greg Cohen**  
Business Development

Greg brings 25+ yrs of experience in real estate acquisition, development and general contracting. He has overseen dozens of multi-million-dollar projects in real estate and at early stage, high -growth companies. For the last 5 yrs he has been deeply involved in large scale cannabis & hemp processing operations across the United States.



**Chris Regan**  
Farm Operations

Chris has over 2 decades of regenerative / organic farming experience in Western, MA and NY. For the past 5 years he has been cultivating and working with industrial hemp and cannabis. Chris is responsible for the success of the harvest, breeding unique genetics and overseeing all aspects of farm operations.

ZGC LLC  
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**[A description of the Marijuana Establishment's plan to obtain a liability insurance policy or otherwise meet the requirements of 935 CMR 500.105(10)];**

### **Plan to Obtain Liability Insurance**

ZGC has previously done work with Kinsale Insurance Company an insurance company with an "A.M. Best Company Rating A (Excellent) our their is Connie Oliviero, CPIA, MLIS she is Vice President of Sales & Risk Management and has provided us a quote to meet the needs of our business and that meets the requirements of the 935 CMR 500.101 (10) as listed below.

Once ZGC receives a license from the CCC, to comply with 935 CMR 500.101 (10) ZGC will at a minimum obtain the following insurance coverage from Kinsale Insurance Company:

- General and product liability coverage of no less that \$1 million per occurrence and \$2 million in aggregate annually;
- The deductible will be no greater than \$5,000 per occurrence

## **Kinsale Insurance Company**

A.M. Best Company Rating: A (Excellent)  
Financial Size Category: IX

XS Brokers Insurance Agency, Inc.

### **QUOTE**

**RE:** ZGC LLC  
200 Highland Ave #401  
Needham Heights, MA 02494

**Company:** Kinsale Insurance Company

**Policy Term:** 12 Month(s) - Effective Date TBD

**Coverage Form:** Commercial General Liability - Claims Made

**Retro Date:** Inception

**Description Of Operations:** Cultivator of Marijuana, Herbs, and Vegetables

We are pleased to offer the following quote. This quote is valid until 01/10/2021 unless extended and agreed to in writing by us. Please read carefully as the terms and conditions of coverage may differ from those requested. **THIS IS NOT A BINDER OF INSURANCE.**

#### **Limits**

Each Occurrence Limit	\$1,000,000
Damages to Premises Rented to You Limit	\$100,000
Medical Expense Limit	\$1,000
Personal & Advertising Injury Limit	\$1,000,000
General Aggregate Limit	\$2,000,000
Products / Completed Operations Aggregate Limit	\$2,000,000

#### **Deductibles**

Per Claim	\$5,000
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\*\* Deductibles apply to all coverages, damages, and expenses.

ZGC LLC “ZGC”  
Cannabis Control Commission “CCC” Applicant  
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**PLANS FOR RESTRICTING ACCESS  
TO PEOPLE AGE 21 AND OLDER  
FOR ZGC LLC  
TIER-11, OUTDOOR CULTIVATION**

**Summary:**

ZGC will follow all requirements of 935 CMR 500 and M.G.L. c. 94G regarding access to the ZGC licensed facility (the “Site”) to people age 21 and older only. This also includes all registered Marijuana Establishment Agents of ZGC as defined by 935 CMR 500 and includes board members, directors, founders, employees, executives, managers, volunteers, services professionals, regulatory officers, law enforcements, inspection services personnel, vendors, and all other persons. Only people age 21 and over are permitted on the Site.

**Plans:**

As ZGC is a licensed cultivator they will not have regular visits from the public. Only pre-approved visitors and guests may have access to the Site so long as they are pre-approved by a manager or director of ZGC and show a valid legal ID upon arriving at the Site, proving they are at least 21 years of age.

ZGC will follow requirements for visitors of the Marijuana Establishment, issue them a visitor badge, keep an accurate sign-in log, sign them in on camera etc., and follow all requirements related to Visitors as defined in 935 CMR 500.

**QUALITY CONTROL AND TESTING  
OF MARIJUANA  
FOR ZGC LLC  
TIER-11, OUTDOOR CULTIVATION**

**Quality Control Summary:**

ZGC will strive to provide the highest quality products to the Massachusetts cannabis community. Product quality, safety, and compliance are essential ingredients for success and will be a primary focus of the team. A large component of ZGC’s approach to quality is focused on building healthy soil that keeps the plants healthy and also by using Integrated Pest Management (IPM) and crop rotation techniques.

**Facility Management:**

**Sanitation:** All structures and workspaces will be designed and constructed to make possible the full sanitation of surfaces and environs that come into contact with the cannabis crop. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA). All walls, floors and ceilings will be constructed of cleanable surfaces and kept clean and free of debris.

**Ventilation:** Adequate ventilation or control equipment will be installed to minimize odors and provide sufficient airflow. Fans and other air-blowing equipment shall be operated in a manner that minimizes the potential for contaminating cannabis products.

**Hygiene:** ZGC will provide its employees with adequate, readily accessible toilet facilities that will be maintained in a sanitary condition and in good repair. Hand-washing facilities will be adequate and convenient and shall be furnished with running water at a suitable temperature, disinfecting soap and single use hand towels.

**Code Compliance:** Facilities shall comply with all applicable State and local building code requirements;

**Rubbish:** Litter and waste shall be properly removed, 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 shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);

**Pest Control:** Prevention of pests will be achieved by good sanitary practices and facility design. Vigilant monitoring for pests will include routine inspection and periodic microbiological testing of the facilities. Pest remediation services will be used as needed to maintain pest free facilities. There will be ongoing monitoring and adaptation of pest management practices;

**Safe Storage:** All toxic items shall be identified, and stored in a manner that protects against contamination of cannabis products;

### **Human Factor:**

In an effort to produce cannabis products with the highest levels of quality and purity, ZGC personnel will maintain the following procedures;

- **Sobriety:** Sundog farm will maintain an alcohol, smoke and drug-free workplace.
- **Cleanliness:** All agents shall conform to sanitary practices while on duty, with regular washing of hands at the start of the workday and at any other time when hands may have become soiled or contaminated.
- **Health:** All agents are subject to the requirements for food handlers specified in 105 CMR 300, which regulation shall be available to and reviewed by all agents.

### **Marijuana Product Testing:**

ZGC sampling and testing policies and procedures will be compliant with the testing requirements outlined in 935 CMR 725.160 and the “Protocol for sampling and analysis of finished medical marijuana products and marijuana-infused products for Massachusetts Registered Medical Marijuana Dispensaries” (the “Protocol”) published by DPH. ZGC will maintain the results of all testing for no less than one year.

### **Testing includes:**

- Cannabinoid Profile
- Contaminants as specified by the Department/Commission including:
  - Mold
  - Mildew
  - Heavy metals
  - Plant-Growth Regulators and Pesticides
  - Bacteria
  - Fungi
  - Mycotoxins

ZGC will contract with a Licensed Independent Testing Laboratory to test all marijuana batches after they have been dried and processed but prior to packaging to ensure contaminant-free purity.

All Products that ZGC will sell or transfer to other Marijuana Establishments will be tested in accordance with 935 CMR 500.160.

ZGC will not sell or otherwise market marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

ZGC LLC “ZGC”

Cannabis Control Commission “CCC” Applicant

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Any testing results indicating noncompliance with M.G.L. c.132B and the regulations at 333 CMR 2.00 through 333 CMR 14.00 will be immediately reported to the Commission.

### **Soil Testing:**

Testing of the soil from the growing area will be performed annually in compliance with the “Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries” published by the DPH.

Any Laboratory that ZGC contracts with will be Licensed by the Commission prior to ZGC contracting them for testing services.

### **Water Testing**

ZGC will contract with an approved environmental testing laboratory for the purposes of testing all of our water in compliance with the Regulations and the “Protocol for sampling and analysis of environmental media for Massachusetts Registered Medical Marijuana Dispensaries”

ZGC will sample and test its water supply prior to use for cultivation of marijuana and quarterly thereafter.

Samples will be taken at the location closest to the cultivation area prior to any water treatment and immediately following any treatment systems. We will test our water for the following contaminants:

- Metals;
- Pesticides;
- Bacteriological contamination;



**RECORDKEEPING PROCEDURES  
FOR ZGC LLC  
TIER-11, OUTDOOR CULTIVATION**

**Summary:**

ZGC has disciplined recordkeeping procedures and policies in place to ensure easy accessibility and clarity by third party auditors, the CCC and for reporting purposes and in accordance with 935 CMR 500.105(9) ‘Recordkeeping’. Copies of key documents, including, but not limited to; inventory records, invoices, signed manifests, transportation logs, security logs, visitor logs, adverse event and sanitation records, testing reports will be backed up and kept on a document cloud sharing platform with printed or signed document records being kept at ZGC headquarters (in a mechanically secure area). For document control purposes all sensitive documents (including those records listed above) will be accessible by authorized management only. All documents will be made available for inspection by authorized agencies and third parties in a timely manner or as required by law, this includes the CCC.

Operating Procedures, Corporate Documents, Employee/Personnel Records and the like will be updated or kept up to date on a monthly and quarterly basis or as required by law and stored for the required time period.

Below is a summary of ZGC’s approach to record keeping by category for CCC compliance and compliance with local, state, and federal regulators.

**Standard Operating Procedures (SOP) - Include but are not limited to;**

- **Inventory Records** ZGC takes a tri-fold approach to inventory accuracy which ensures compliance with 935 CMR 500.105(8) and one that is built on redundancy through daily reconciliation protocols that produce real time inventory accuracy with METRC and has alignment with accounting and sales/invoice records or any records recording the movement of product (EG Transfer Manifest, Returned Inventory, etc).
- **Sanitation and Safety Records** - ZGC will be in compliance with 105 CMR 500: Good Manufacturing Practices for Food and keep a record of all Food Safety handling training certificates from all employees and in accordance with ZGC’s established procedures. Records of temperature, humidity and daily cleanings of all food grade surfaces and processing equipment that interacts with the marijuana product will also be kept.
- **Materials Records** - All stock items that are non-cannabis will be documented. All cannabis materials will be tracked and recorded in accordance with ZGC’s Inventory Records SOP and applicable law.
  - Materials will be tracked on a daily or weekly basis and made available to third party auditors upon request.
- **Security and Security Inspection Records** - In addition to the electronic surveillance ZGC will have on site and any records required by 500 CMR 500(110): “Security Requirements for Marijuana Establishments” - daily visual inspections by authorized employee Agents will be logged, digitally archived with any abnormal findings being photographed and a manager immediately notified to determine what action, if any needs

## ZGC LLC “ZGC”

### Cannabis Control Commission “CCC” Applicant

December 2020

to be taken. Security logs and protocols will be reviewed by-annually (at a minimum) by the Local Chief of Police in Sheffield, MA as required by local By-Laws.

- A list of Employees/Agents who are authorized to access limited access areas will be kept up to date at all times.
- Video logs, 24 hour / day recording that will be kept for at least 90 days and be made available to the CCC on request.
- **Transportation Records** - In compliance w/ 935 CMR 500.105(13) “Transportation Between Marijuana Establishments”, including
  - All shipping manifests (hard copies w/ digital backups) will be kept for at least one (1) year and be made available to the CCC on request.
  - Video surveillance records of transports will kept on a secure server as required
  - Weight discrepancies will be catalogued and reported to management, the CCC, and the local authorities if needed.
- **Personnel Records: In accordance with 935 CMR 500.105(9)(d)**
  - 1. Job descriptions for each employee and organization chart;
  - A personnel record for each employee and contractor and registered Agent
    - Maintained for 12 months after termination and shall include;
      - All records submitted to to the Commission pursuant to 935 CMR 500.030(2);
      - References and verification
      - Job description, employment contract and resume
      - Trainings and certificates
      - Performance evaluations,
      - Disciplinary records
      - Background check Information in accordance w/ M.G.L c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: Criminal Offender Record Information (CORI).
      - Staffing plan detail
- **Waste Disposal:** Waste disposal records as required under 935 CMR 500.105(12) and ZGC Procedures as detailed in applicable section, this includes Marijuana Waste handling procedure data.
- **Business Records**
  - Certificate of Good Standing (including from Dept of Revenue)
  - Certificate of Organization
  - Operating Agreement
  - Capitalization Table and Stock Agreements (if any)
  - Compensation Packages (salary, bonuses, wages, stock etc.)
  - Signed Agreements / Contracts
  - Accounting - In accordance with Generally Accepted Accounting Principles (GAAP) with our third party bookkeeper and cannabis accountant (identified but not yet on agreement)
    - Book of Accounts
    - Assets / Liabilities and other accounting documents
  - Annual Reports
  - Secretary of State Filings
  - Insurance

ZGC LLC “ZGC”

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- Directors & Officers Insurance
  - General Liability Insurance
  - Product Liability
  - Employer Professional Liability
  - Crop Insurance
  - Workers Compensation
- Certificate of Occupancy
- Host Community Agreement
- Service Provider Contracts
- CCC Reporting Records
- Licenses
- **Quality Control Records-** In accordance with ZGC quality control policy, see applicable section all climate data (temperature, dates, humidity, air quality) will be kept on file as well as in process testing from a third-party cannabis lab and final state testing according to applicable law.

**MAINTAINING FINANCIAL RECORDS  
FOR ZGC LLC  
TIER-11, OUTDOOR CULTIVATION**

**Summary:**

ZGC’s philosophy on financial recordkeeping, accounting and bookkeeping is based on built-in redundancy to ensure real-time accuracy, inventory and transaction harmony, and efficiency.

**Financial Recordkeeping, Accounting and Bookkeeping:**

All accounting and bookkeeping services will be performed by a chosen third-party services provider that is familiar with cannabis cultivation operations and in compliance with Generally Accepted Accounting Principles (GAAP), the reporting requirements set forth in 935 CMR 500 and all applicable federal, state, and local tax laws.

ZGC will use QuickBooks Online (or equivalent) for real time cloud based visibility and have their books and finances independently audited on an annual basis to ensure accuracy and best practices are being used.

ZGC “Maintenance of Financial Records” will be done in accordance with 935 CMR 500.105(9), and also comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements, at a minimum these will include;

- Confidentiality of sensitive information (will be kept in password protected, limited document access files).
  - The CCC may access this information as needed or as requested by regulatory agencies.
- Assets and liabilities;
- All monetary transactions;
- All sales records, checks, invoices, rebates and returns and the like
- Employee or Owner Compensation Plans and Disbursements
- Escrow or bond fee accounts in compliance with 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
- All fees paid to the Commission 935 CMR 500.005
- Local Community Impact Fees or monetary / in-kind donations.

**ATTESTATION REGARDING  
CERTIFICATE OF GOOD STANDING  
FROM  
DEPARTMENT OF UNEMPLOYMENT ASSISTANCE**

ZGC LLC, an applicant for Tier-11 Cannabis Cultivation (Outdoor) license (“the Applicant”) cannot receive a certificate of good standing from the Department of Unemployment Assistance that is dated within 90 days of the date the Management and Operations Profile was originally submitted to the Cannabis Conservation Commission (“CCC”) because the Applicant cannot register with the department until hiring employees. (Required for all applications submitted on or after November 1, 2019) *935 CMR 500.101(1)*

**Authorized Representative of ZGC LLC:** Zachary Ahrens

1. I, the above identified individual, attest that ZGC LLC cannot receive a certificate of good standing from the Department of Unemployment Assistance because we have not hired any employees yet.
2. I, the above identified individual, attest that ZGC LLC will notify the CCC when any employees are hired and submit a certificate of good standing from the Department of Unemployment Assistance, as soon as is possible.

I affirm that all the information provided within this attestation is true and accurate. I further affirm that all required attestations written above have been made voluntarily, and by signing below, certify that I do in fact make these true and accurate attestations.

**Authorized Representative Signature:** \_\_\_\_\_



Zack Ahrens  
Founder, ZGC LLC  
Date: 01.01.21

**PERSONNEL POLICY & BACKGROUND CHECKS  
FOR ZGC LLC  
TIER-11, OUTDOOR CULTIVATION**

**Summary:**

ZGC is determined to build a team of employees that will excel at their individual roles within the company and through their hard work deliver success in the form of exceptional marijuana for our customers. We are also determined to build a work environment that is safe and equitable as well as fully compliant with all requirements related to personnel policies and background checks as stated in 935 CMR 500.101(1), 935 CMR 500.105(1), 935 CMR 500.105(9) and other local and state regulations regarding employees.

**Details:**

☐ ZGC has a staffing plan and records plan in compliance with 935 CMR 500.105(9) and 935 CMR 500.105(1). For each employee hired, ZGC shall maintain the following personnel records policy:

1. Job descriptions for each employee or volunteer position;
2. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual’s affiliation with the Company and shall include, at a minimum, the following:
  - A. all materials submitted to the CCC pursuant to 935 CMR 500.030(2);
  - B. documentation of verification of references (at least one professional reference will be checked and kept on file);
  - C. the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
  - D. documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters (this includes diversity training for ZGC)
  - E. documentation of periodic performance evaluations (which shall happen at least twice per year)
  - F. a record of any disciplinary action taken (and full report signed by manager)
  - G. notice of completed responsible vendor and eight-hour duty-related training;
  - H. Personnel policies and procedures;
    - i. Which includes incident reporting and documentation, disciplinary actions and promotional qualifications
  - I. All background check reports obtained in accordance with 935 CMR 500.030.

Also, ZGC staffing plans will include the following and apply to all situations including hiring, firing, promotions, harassment, training, wages and benefits:

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- -Equal Employment Opportunity Commission (EEOC) Compliance;
- -Diversity Plan;
- -Mandatory reporting of criminal convictions (and termination if necessary);
- -State and Federal Family Leave Act;
- -Workplace Safety Laws;

The Company intends to hire and train the following staff in addition to Head Grower for the cultivation facility and in addition to the founding team (which will take on CEO and COO responsibilities) will be:

**Assistant Grower / Records Specialist (full time)**

Primary Duties:

- to assist Head Grower with all tasks involved with the cultivation of the marijuana crop, ie. field prep, sowing, irrigation, weed control, mulching, pruning, harvesting, etc.;
- to assist in collection and maintenance of all data directly related to cultivation, ie. plant tissue testing, soil testing; as well as assisting with the implementation of the required seed to sale tracking system required by the state (METRC);

**Assistant Grower (full time)**

Primary Duties:

- to assist Head Grower with all tasks involved with the cultivation of the marijuana crop, ie. field prep, sowing, irrigation, weed control, mulching, pruning, harvesting, etc.;

**Harvest Associate / Processing Associate (seasonal, full time)**

Primary Duties:

- to assist with harvesting, drying, processing, clerical duties, maintenance, adherence to SOPs and SOP refinement

**All personnel must:**

- be 21 yrs or older;
- have not been convicted of an offense involving the distribution of controlled substances to minors;
- meet all requirements of 935 CMR 500.800, 935 CMR 500.801, and 935 CMR 500.802;
- be willing and able to follow all workplace rules and requirements including maintaining an alcohol, smoke, and drug free workplace.

ZGC shall register each employee as an Establishment Agent with the Cannabis Control Commission and maintain their registrations in accordance with 935 CMR 500.03, which includes submitting background information and a Criminal Offender Record Information (CORI), report to the Commission.

Business services for Legal, Accounting, Tax Filing, Payroll and Insurance matters will be outsourced to qualified service professionals.



**ENERGY COMPLIANCE PLAN  
FOR ZGC LLC  
TIER\_11 OUTDOOR CULTIVATION**

**Summary:**

ZGC LLC will be using solar power for most of its electricity needs.

- Low impact growing methods and utilizing no electrical lights for growing will reduce ZGC’s energy demand. Other methods of energy conservation will include:
  - Using well water for irrigation
  - Ensuring all lighting and switches are motion activated and w/ timers
  - Enroll in Mass Save program to further develop efficiency within our operation

**Equipment and Details:**

ZGC LLC will satisfy the minimum energy efficiency and equipment standards set forth under 935 CMR 500.120(11)

☐ 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 per *935 CMR 500.105(15)*. ZGC seeks every opportunity to become net-neutral and this will include looking into solar installation in Year 2 of operations to reduce grid-supplied electricity and to reduce the reliance on fossil fuels consumed by generators for our refrigeration trailers. ZGC will utilize “Goal Zero” Solar, Power Generation stations – “YETI 1500x Portable Power Station”. See the attached Exhibit 1 “Site Plan” to showcase the potential locations of the solar generation stations.

☐ Strategies to reduce electric demand (such as lighting schedules, active load management, and energy storage) per *935 CMR 500.105(15)*. ZGC is focused on net-neutral business and one of the strategies ZGC will employ to reduce electrical demand and the associated fossil fuel emissions will be to have motion sensors on all exterior security lights and install solar power in Year 2.

☐ Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants. *935 CMR 500.105(15)*. ZGC plans to participate in the town of Sheffield’s “Community Choice Power Supply Program” to opt-into power supplied from renewable sources. The current provider for Sheffield is National Grid and the Town of Sheffield has chosen Dynegy Energy Services to help them satisfy their community power aggregation services.

**EXHIBIT 1**  
**SITE PLAN**

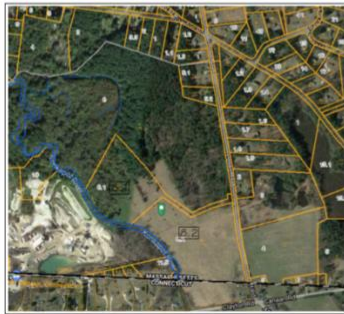
Pre-liminary sketch – Site Plan Proposal

SITE PLAN : POLIKOFF RD, SHEFFIELD MASSACHUSETTS 01222  
LOCATION  
PROPERTY ID : 8.2 = PARCEL ID: 267/008.0-0001-0008.2



LOCATION MAP

LATITUDE : 42.056263  
LONGITUDE : 42.049205



LEGEND

- |       |                |
|-------|----------------|
| conc. | CONCRETE FLOOR |
| grs.  | GRASS          |
- Property corner
  - Light
  - Greenhouses
  - Grass
  - Concrete Floor
  - Solar Power Generators

AC

NOTE

ARCHITECT

Archytrend

DESIGNED : ARC

CHECKED : ARC

DATE : Nov 2020

CLIENT

ZGC LLC

PROJECT

SITE PLAN

LOCATION

POLIKOFF RD, SHEFFIELD  
MASSACHUSETTS 01222

SHEET NO:

01

SCALE :  
1/64" = 1'-0"

**QUALIFICATIONS AND EMPLOYEE TRAINING  
FOR ZGC LLC  
TIER-11, OUTDOOR CULTIVATION**

**Summary:**

ZGC employees will undergo specific training in order to ensure that all employees contribute to the success of the company produce high quality marijuana products and to operate in full compliance with all applicable regulations. To achieve this, ZGC will maintain a complete Employee Handbook which will be provided to all employees. All new employees will participate in a Responsible Vendor Program (“RVP”), within 90 days of being hired, and all documentation from the RVP will be retained for four (4) years as specified in 935 CMR 500.105 (2). All SOPs and trainings, will be documented and stored within employee records. All ZGC employees and ZGC Marijuana Agents, will receive training from an approved CCC Vendor Trainer to ensure;

- ZGC employees are operating in accordance with state laws, regulations and local rules.
- ZGC employees are following “Seed-to-sale” tracking compliance.
- ZGC employees are preventing diversion and sales to minors.
- ZGC employees know the effects of cannabis on the human body.

**Details:**

☐ A list of anticipated positions and their qualifications. 935 CMR 500.105

- Chief Executive Officer, CEO – Responsible for financial health and growth of the company. Responsible for ensuring that ZGC remains competitive and compliant. 10 years or more of experience in fund raising, managing start-ups and cannabis start-ups will be considered a qualification. A peer-based performance review will be conducted and documented once per year to evaluate performance with the founders and BOD of the company. This position reports to the BOD.
- Chief Operating Officer, COO – Responsible for financial health, operational efficiencies across the supply chain and compliance. 5 years or more of prior business experience in a supply chain company, managing budgets, financial planning, cannabis start-ups and holding an MBA will be considered a qualification. A peer-based performance review will be conducted and documented once per year to evaluate performance with the founders and BOD of the company. This position reports to the BOD.
- Head Grower – Responsible for production planning and producing health cannabis plants and reducing production costs (year over year). 5 years or more of experience cultivating, soil management, in vegetable production, cannabis, and / or hemp using regenerative farming practices will be considered a qualification for this position. A peer-based performance review will be conducted and documented once per year to evaluate performance with the founders and BOD of the company. This position reports to the BOD.
- Assistant Director of Operations – 3 years or more project management experience and supply chain experience will be considered a qualification. A peer-based performance review will be conducted and documented once per year to evaluate performance with the COO. This position reports to the COO.

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- Assistant Grower / Records Specialist – Prior experience in business administration, clerical duties, attention to detail will be considered a qualification for this role. A peer-based performance review will be conducted and documented once per year to evaluate performance with the Head Grower, this position reports to the Head Grower and the COO.
- Harvest Associate - Prior experience in farming, manufacturing, construction, cannabis will be considered a qualification or output based quota carrying roles will be considered a qualification. Prior experience in business administration, clerical duties, attention to detail will be considered a qualification for this role. A peer-based performance review will be conducted and documented once per year to evaluate performance with the Head Grower, this position reports to the Head Grower and the COO.
- Processing Associate – Prior experience in farming, manufacturing, construction, cannabis will be considered a qualification or output based quota carrying roles will be considered a qualification. Prior experience in business administration, clerical duties, attention to detail will be considered a qualification for this role. A peer-based performance review will be conducted and documented once per year to evaluate performance with the Head Grower, this position reports to the Head Grower and the COO.

☐ ZGC will ensure that all employees are trained on job specific duties prior to performing job functions per 935 CMR 500.105(2). Within the first two weeks (from the date of hire) all employees will review the Handbook the company culture, get safety training and SOP training, a test will be administered on all SOPs and a tour of the facility will be given. Please see training details below in “Details Continued” section.

☐ ZGC will ensure that all new employees shall complete the Responsible Vendor Program within 90 days of being hired per 935 CMR 500.105(2). Please see comments above in the above “Summary”.

☐ ZGC will retain Responsible Vendor Program documentation for four (4) years per 935 CMR 500.105(2). Records will be kept electronically and in paper form in a secure location at company Head Quarters within the associated employee file.

### **Details Continued:**

All employees will go through a minimum of 8 hours of annual training. Training will cover the following:

- Health, safety, and sanitation standards;
- Security procedures including: entry procedure, diversion monitoring, perimeter integrity monitoring;
- Emergency Plans including: medical emergency response, fire response, power outage response;
- Training on Commission Statutes and Rules and Other State and Local Laws and Regulations;
- Training on Company Standard Operating Procedures and Compliance;
- Training on Detection and Prevention of Diversion of Marijuana;
- Training on Inventory Control and Record Keeping;

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- Reporting mechanisms for complaints related to harassment or discrimination;

All employees will review and retain a copy of Employee Handbook which will contain the following:

- The Company mission and values;
- Employee requirements and instructions;
- MA Adult Use Regulatory compliance guidelines;
- Standards of conduct;
- Information on the “Responsible Vendor Program” as required by 935 CMR 500.105(2)(b);
- Work attendance and punctuality policies;
- Protocols for requesting time off and sick days;
- Protection of confidential information;
- Workplace security and safety policies, i.e., security protocols, emergency protocols, zero-tolerance weapons at work policy;
- Zero-tolerance workplace drug and alcohol policy;
  - Disciplinary protocols, including a policy for the immediate dismissal of any marijuana establishment agent who has:
  - Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
  - Engaged in unsafe practices with regard to the operation of the Marijuana Establishment, which shall be reported to the Commission;
  - Violated the zero-tolerance workplace drug and alcohol policy; 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;
- Information for employee compensation and benefits.

**DIVERSITY PLAN  
FOR ZGC LLC  
TIER 11, OUTDOOR CULTIVATION**

**Summary:**

ZGC is dedicated to promoting equity in its hiring practices and in the way they do business to promote a diverse workforce from populations defined by the CCC as:

1. Minorities.
  2. Women.
  3. Veterans.
  4. People with disabilities; and
  5. LGBTQ+
- 
1. ZGC will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments.
  2. Any actions taken, or programs instituted, by the ZGC will not violate the Commission’s regulations with respect to limitations on ownership or control or other applicable state laws.

Below is an overview of ZGC’s Diversity Plan to support, train and work with these populations including the goals for the plan, it’s various programs and how they function and measurements to ensure ZGC can track and benchmark progress against these goals.

**Goals:**

- 1) 15% of service providers will be from the following demographics: minorities; women, veterans, people with disabilities, and people who identify as LBTGQ+
- 2) 20% of wholesale partners (including brands) will be from the following demographics: minorities; women, veterans, people with disabilities, and people who identify as LBTGQ+
- 3) ZGC will post job opportunities at least once per year or as often as is needed, and post jobs on the platforms listed in the Exhibit. ZGC will hire from the following diverse populations and ensure they have the skills/trainings in place to succeed:
  - a. At least 20% women
  - b. At least 10% from populations that identify as either LGBTQ
  - c. At least 10% veterans
  - d. At least 10% minorities
  - e. At least 5% persons with disabilities.

**Programs:**

ZGC has developed and will implement specific operational programs and practices to achieve its diversity goals and promote a diverse working environment. Including:

1. Recruitment & Advertising Focus (See Exhibit 1, Recruiting & Advertising Programs)

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2. Support brands that are aimed at populations of diversity. Buyer evaluation processes will screen for this and assess how a brand is towards customers that identify from populations of diversity. For example, Beboe and Garden Society are both brands that cater to the female demographic and are both women owned – if/when they expand into the MA market, ZGC will seek to be a supply chain partner with them.
3. Host a staff book club (that meets once per month) that reads and discusses books that are written by “diverse” authors or on subjects of race, diversity, social equity, class structures in the U.S. or privilege. Host, in-person or in a virtual setting a “diversity consultant” for at least a 1-hour professional development seminar to educate staff at least once per year on the importance of diversity in the workforce and other social equity aligned topics.

### Measurements:

Measurement of the diversity program will be done by the COO or another member of the company leadership team. Diversity Program metrics will be tracked in annual reports and reviewed on a quarterly basis. The programs are specifically intended to infuse a culture and dialogue of diversity into the day-to-day operations of ZGC to elevate diversity fluency and acumen among its employees. Key metrics are below.

Measurements (All documentation to be made available to the CCC on request.)	
1.)	Count number of service providers who are be from the following demographics: minorities; women, veterans, people with disabilities, and people who identify as LBTGQ+ on an annual basis. Goal is 15%.
2.)	Count number of wholesale partners (including brands) who are be from the following demographics: minorities; women, veterans, people with disabilities, and people who identify as LBTGQ+ on an annual basis. Goal is 20%.
3.)	Count number of individuals from the above-referenced demographic groups who were hired and retained after the issuance of a license on an annual basis. Goal is to have more people hired at ZGC than the previous calendar year (time measured).  Count the number of professional development workshops held for ZGC staff per year, their topic, duration, speaker, and any relevant readings to ensure success of employees hired under this program.
4.)	Advertising & Recruitment <ul style="list-style-type: none"><li>• # of job postings sent to the list of identified diversity networks above.</li><li>• # of sponsored job positing sent to the diversity networks identify above</li></ul>



EXHIBIT 1  
 RECRUITING & ADVERTISING PROGRAM

A.	<a href="#">The Tech Connection (TTC)</a> <ul style="list-style-type: none"> <li>Recruit</li> </ul>	<b>About:</b> Is a recruiting platform, which allows employers to make meaningful connections, engage and empower diverse talent, whose headquarters is in Boston.
B	<a href="#">Women Empowered In Cannabis.(WEiC)</a> <ul style="list-style-type: none"> <li>Recruit &amp; Advertise</li> </ul>	<b>About:</b> WEiC is a community of women working in cannabis dedicated to building an industry that is diverse and gender inclusive. <b>Comments:</b> ZGC can sponsor an email campaign to recruit from their network of women in cannabis. <ul style="list-style-type: none"> <li>We will post job opportunities on this platform for all job searches ZGC is engaged in.</li> </ul>
D	<a href="#">TheRainbowTimes</a> <ul style="list-style-type: none"> <li>Recruit &amp; Advertise</li> <li>Other:               <ul style="list-style-type: none"> <li>EDGE Boston</li> <li>Spirit Magazine</li> <li>Bay State Banner;</li> </ul> </li> </ul>	<b>About:</b> “New England’s largest LGBTQ Newspaper, since 2006” <b>Comments:</b> ZGC will make job postings on their job board as part of their talent search process. <ul style="list-style-type: none"> <li>We will post job opportunities on these platforms for all job searches ZGC is engaged in.</li> </ul>