



Massachusetts Cannabis Control Commission

Marijuana Product Manufacturer

General Information:

License Number: MP281445
Original Issued Date: 02/07/2019
Issued Date: 01/14/2021
Expiration Date: 02/07/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Apothca, Inc

Phone Number: 305-741-6540 Email Address: joseph@artcangroup.com

Business Address 1: 99 Development Rd Business Address 2:

Business City: Fitchburg Business State: MA Business Zip Code: 01420

Mailing Address 1: 99 Development Rd Mailing Address 2:

Mailing City: Fitchburg Mailing State: MA Mailing Zip Code: 01420

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: yes

Priority Applicant Type: RMD Priority

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number: RPA201880

RMD INFORMATION

Name of RMD: Apothca, Inc.

Department of Public Health RMD Registration Number: 025

Operational and Registration Status: Obtained Final Certificate of Registration, but is not open for business in Massachusetts

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: Percentage Of Control:
25

Role: Executive / Officer Other Role:

First Name: Andrew Last Name: Young Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: Percentage Of Control:
25

Role: Director Other Role:

First Name: Rachmil Last Name: Lekach Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French), Hispanic, Latino, or Spanish (Mexican or Mexican American, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: Percentage Of Control: 25

Role: Director Other Role:

First Name: Moshe Last Name: Bleich Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: Percentage Of Control: 25

Role: Director Other Role:

First Name: Leon Last Name: Nitka Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: 100 Percentage of Ownership:

Entity Legal Name: Artcan, LLC

Entity DBA:

DBA

City:

Entity Description: Cannabis investment and holding company

Foreign Subsidiary Narrative:

Entity Phone:

Entity Email:

Entity Website:

Entity Address 1:

Entity Address 2:

Entity City:

Entity State:

Entity Zip Code:

Entity Mailing Address 1:

Entity Mailing Address 2:

Entity Mailing City:

Entity Mailing State:

Entity Mailing Zip Code:

Relationship Description: Artcan is the sole member of Apothca, Inc ("Apothca"), a not-for-profit, and is the source of debt capital for Apothca. Artcan LLC holds no equity in Apothca as Apothca is a not-for-profit.

CLOSE ASSOCIATES AND MEMBERS

Close Associates or Member 1

First Name: Joseph

Last Name: Lekach

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Chief Executive Officer, Chief Operating Officer, and President for Apothca, Inc.
President of Artcan LLC

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: Artcan LLC

Entity DBA:

Email: joseph@artcangroup.com Phone: 305-741-6540

Address 1: 2001 Tyler St

Address 2: STE 5

City: Hollywood

State: FL

Zip Code: 33020

Types of Capital: Debt

Other Type of Capital: Total Value of Capital Provided: \$3000000 Percentage of Initial Capital: 100

Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Business Interest in Other State 1

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

Owner First Name: Artcan
LLC

Owner Last Name:

Owner Suffix:

Entity Legal Name: Artcan IP LLC

Entity DBA:

Entity Description: Holder of marijuana-related trademarks

Entity Phone: 305-741-6540

Entity Email:
joseph@artcangroup.com

Entity Website:

Entity Address 1: 1886 Tyler Street

Entity Address 2:

Entity City: Hollywood

Entity State: FL

Entity Zip Code: 33020

Entity Country: USA

Entity Mailing Address 1: 1886 Tyler Street

Entity Mailing Address 2:

Entity Mailing City:
Hollywood

Entity Mailing State: FL

Entity Mailing Zip Code:
33020

Entity Mailing Country:
USA

Business Interest in Other State 2

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

Owner First Name: Artcan
LLC

Owner Last Name:

Owner Suffix:

Entity Legal Name: Artcan Licensing LLC

Entity DBA:

Entity Description: Entity used for licensing IP with marijuana-related businesses

Entity Phone: 305-741-6540

Entity Email:
joseph@artcangroup.com

Entity Website:

Entity Address 1: 1886 Tyler Street

Entity Address 2:

Entity City: Hollywood

Entity State: FL

Entity Zip Code: 33020

Entity Country: USA

Entity Mailing Address 1: 1886 Tyler Street

Entity Mailing Address 2:

Entity Mailing City:
Hollywood

Entity Mailing State: FL

Entity Mailing Zip Code:
33020

Entity Mailing Country:
USA

Business Interest in Other State 3

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

Owner First Name: Artcan Owner Last Name: Owner Suffix:
LLC

Entity Legal Name: VillageDPC, LLC Entity DBA:

Entity Description: Applicant entity for marijuana businesses

Entity Phone: 305-741-6540 Entity Email: Entity Website:
joseph@artcangroup.com

Entity Address 1: 1886 Tyler Street Entity Address 2:

Entity City: Hollywood Entity State: FL Entity Zip Code: 33020 Entity Country: USA

Entity Mailing Address 1: 1886 Tyler Street Entity Mailing Address 2:

Entity Mailing City: Entity Mailing State: FL Entity Mailing Zip Code: Entity Mailing Country:
Hollywood 33020 USA

Business Interest in Other State 4

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

Owner First Name: Artcan Owner Last Name: Owner Suffix:
LLC

Entity Legal Name: AC Oregon LLC Entity DBA:

Entity Description: Holding company; owner of AC Eugene LLC

Entity Phone: 305-741-6540 Entity Email: Entity Website:
joseph@artcangroup.com

Entity Address 1: 5200 SW MacAdam Avenue Entity Address 2: Suite 500

Entity City: Portland Entity State: OR Entity Zip Code: 97239 Entity Country: USA

Entity Mailing Address 1: 1886 Tyler Street Entity Mailing Address 2:

Entity Mailing City: Entity Mailing State: FL Entity Mailing Zip Code: Entity Mailing Country:
Hollywood 33020 USA

Business Interest in Other State 5

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

Owner First Name: Artcan Owner Last Name: Owner Suffix:
LLC

Entity Legal Name: AC Eugene LLC Entity DBA:

Entity Description: Operating state-legal marijuana business

Entity Phone: 305-741-6540 Entity Email: Entity Website:
joseph@artcangroup.com

Entity Address 1: 1211 Alder Street Entity Address 2:

Entity City: Eugene Entity State: OR Entity Zip Code: 97401 Entity Country: USA

Entity Mailing Address 1: 1886 Tyler Street Entity Mailing Address 2:

Entity Mailing City: Entity Mailing State: FL Entity Mailing Zip Code: Entity Mailing Country:
Hollywood 33020 USA

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Andrew Last Name: Young Suffix:

Marijuana Establishment Name: Apothca, Inc. Business Type: Marijuana Cultivator

| | | |
|--|--|----------------|
| Marijuana Establishment City: Fitchburg | Marijuana Establishment State: MA | |
| Individual 2 | | |
| First Name: Andrew | Last Name: Young | Suffix: |
| Marijuana Establishment Name: Apothca, Inc. | Business Type: Marijuana Retailer | |
| Marijuana Establishment City: Arlington | Marijuana Establishment State: MA | |
| Individual 3 | | |
| First Name: Andrew | Last Name: Young | Suffix: |
| Marijuana Establishment Name: Apothca, Inc. | Business Type: Marijuana Retailer | |
| Marijuana Establishment City: Lynn | Marijuana Establishment State: MA | |
| Individual 4 | | |
| First Name: Joseph | Last Name: Lekach | Suffix: |
| Marijuana Establishment Name: Apothca, Inc. | Business Type: Marijuana Cultivator | |
| Marijuana Establishment City: Fitchburg | Marijuana Establishment State: MA | |
| Individual 5 | | |
| First Name: Joseph | Last Name: Lekach | Suffix: |
| Marijuana Establishment Name: Apothca, Inc. | Business Type: Marijuana Retailer | |
| Marijuana Establishment City: Arlington | Marijuana Establishment State: MA | |
| Individual 6 | | |
| First Name: Joseph | Last Name: Lekach | Suffix: |
| Marijuana Establishment Name: Apothca, Inc. | Business Type: Marijuana Retailer | |
| Marijuana Establishment City: Lynn | Marijuana Establishment State: MA | |
| Individual 7 | | |
| First Name: Leon | Last Name: Nitka | Suffix: |
| Marijuana Establishment Name: Apothca, Inc. | Business Type: Marijuana Cultivator | |
| Marijuana Establishment City: Fitchburg | Marijuana Establishment State: MA | |
| Individual 8 | | |
| First Name: Leon | Last Name: Nitka | Suffix: |
| Marijuana Establishment Name: Apothca, Inc. | Business Type: Marijuana Retailer | |
| Marijuana Establishment City: Arlington | Marijuana Establishment State: MA | |
| Individual 9 | | |
| First Name: Leon | Last Name: Nitka | Suffix: |
| Marijuana Establishment Name: Apothca, Inc. | Business Type: Marijuana Retailer | |
| Marijuana Establishment City: Lynn | Marijuana Establishment State: MA | |
| Individual 10 | | |
| First Name: Moshe | Last Name: Bleich | Suffix: |
| Marijuana Establishment Name: Apothca, Inc. | Business Type: Marijuana Cultivator | |
| Marijuana Establishment City: Fitchburg | Marijuana Establishment State: MA | |
| Individual 11 | | |
| First Name: Moshe | Last Name: Bleich | Suffix: |
| Marijuana Establishment Name: Apothca, Inc. | Business Type: Marijuana Retailer | |

Marijuana Establishment City: Arlington Marijuana Establishment State: MA

Individual 12

First Name: Moshe Last Name: Bleich Suffix:
Marijuana Establishment Name: Apothca, Inc. Business Type: Marijuana Retailer
Marijuana Establishment City: Lynn Marijuana Establishment State: MA

Individual 13

First Name: Rachmil Last Name: Lekach Suffix:
Marijuana Establishment Name: Apothca, Inc. Business Type: Marijuana Cultivator
Marijuana Establishment City: Fitchburg Marijuana Establishment State: MA

Individual 14

First Name: Rachmil Last Name: Lekach Suffix:
Marijuana Establishment Name: Apothca, Inc. Business Type: Marijuana Retailer
Marijuana Establishment City: Arlington Marijuana Establishment State: MA

Individual 15

First Name: Rachmil Last Name: Lekach Suffix:
Marijuana Establishment Name: Apothca, Inc. Business Type: Marijuana Retailer
Marijuana Establishment City: Lynn Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 99 Development Rd
Establishment Address 2:
Establishment City: Fitchburg Establishment Zip Code: 01420
Approximate square footage of the Establishment: 66000 How many abutters does this property have?: 14
Have all property abutters have been notified of the intent to open a Marijuana Establishment at this address?: Yes

HOST COMMUNITY INFORMATION

Host Community Documentation:

Table with 5 columns: Document Category, Document Name, Type, ID, Upload Date. Rows include Certification of Host Community Agreement, Plan to Remain Compliant with Local Zoning, and Community Outreach Meeting Documentation.

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.: \$0.01

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Table with 5 columns: Document Category, Document Name, Type, ID, Upload Date

Apothca. Artcan LLC holds no equity in Apothca as Apothca is a not-for-profit.

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

| Document Category | Document Name | Type | ID | Upload Date |
|--|--|------|--------------------------|-------------|
| Department of Revenue - Certificate of Good standing | MPF DOR Cert.pdf | pdf | 5b579e3e1ccce4282510a178 | 07/24/2018 |
| Articles of Organization | Articles of Organization.pdf | pdf | 5b579e4c8a93fd282f3e3352 | 07/24/2018 |
| Bylaws | Third Amended By-Laws 12.21.17 Final.pdf | pdf | 5b579e64af8f7f28392e8564 | 07/24/2018 |
| Articles of Organization | MPF Change of Name to Apothca.pdf | pdf | 5bdf9d2b4088250d697fcbf4 | 11/04/2018 |
| Secretary of Commonwealth - Certificate of Good Standing | Apothca_SoC Cert of Good Standing.pdf | pdf | 5bdf9d2fd84f77046ceecd86 | 11/04/2018 |
| Articles of Organization | Apothca_Articles of Amendment for Name Change.pdf | pdf | 5bdf9d361a7752047b590bea | 11/04/2018 |
| Articles of Organization | Fitchburg Acknowledgment of Name Change to Apothca 11.9.18.pdf | pdf | 5bec73b3730d5d0462f12154 | 11/14/2018 |

Certificates of Good Standing:

| Document Category | Document Name | Type | ID | Upload Date |
|--|------------------------------------|------|--------------------------|-------------|
| Secretary of Commonwealth - Certificate of Good Standing | Apothca_SOC Good Standing Cert.pdf | pdf | 5fb2dec18cc05c081b1b8916 | 11/16/2020 |
| Department of Revenue - Certificate of Good standing | Apothca_DOR Good Standing Cert.pdf | pdf | 5fb2dec7dfcf9f07cd94644e | 11/16/2020 |
| Department of Unemployment Assistance - Certificate of Good standing | Apothca_DUA Good Standing Cert.pdf | pdf | 5fb2decc08242707d4a792ae | 11/16/2020 |

Massachusetts Business Identification Number: 001177859

Doing-Business-As Name:

DBA Registration City: Newton

BUSINESS PLAN

Business Plan Documentation:

| Document Category | Document Name | Type | ID | Upload Date |
|------------------------------|---|------|--------------------------|-------------|
| Business Plan | Apothca_Business Plan.pdf | pdf | 5de959ed160e3b57a3dd57f2 | 12/05/2019 |
| Plan for Liability Insurance | Apothca_Plan to Obtain Liability Insurance UPDATED .pdf | pdf | 5df16e8cea4df3530e648af3 | 12/11/2019 |
| Proposed Timeline | Apothca_Updated Timeline_Fitchburg.pdf | pdf | 5fc7009715105a0779711452 | 12/01/2020 |

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

| Document Category | Document Name | Type | ID | Upload |
|-------------------|---------------|------|----|--------|
|-------------------|---------------|------|----|--------|

| | | | | Date |
|--|--|-----|--------------------------|------------|
| Diversity plan | Apothca_Diversity Plan UPDATED.pdf | pdf | 5dfbe543ef24345344e4e56c | 12/19/2019 |
| Types of products Manufactured. | Apothca_Types of Products Manufactured.pdf | pdf | 5faec8876e60eb07f57f3102 | 11/13/2020 |
| Sample of unique identifying marks used for branding | Apothca_Samples of Unique Identifying Marks.pdf | pdf | 5faec9978cc05c081b1b8160 | 11/13/2020 |
| Method used to produce products | Apothca_Methods Used to Produce Products.pdf | pdf | 5faec9b3edc7d60856d9824d | 11/13/2020 |
| Separating recreational from medical operations, if applicable | Apothca_Plan for Separating Recreational from Medical Operations.pdf | pdf | 5faec9c675aac308359adcf8 | 11/13/2020 |
| Restricting Access to age 21 and older | Apothca_Plan for Restricting Access to 21.pdf | pdf | 5faec9da70836208402870f2 | 11/13/2020 |
| Security plan | Apothca_Security Plan_Fitchburg.pdf | pdf | 5faec9f9dd2d7407bedecd8a | 11/13/2020 |
| Prevention of diversion | Apothca_Prevention of Diversion.pdf | pdf | 5faeca016e60eb07f57f310e | 11/13/2020 |
| Storage of marijuana | Apothca_Storage Policy.pdf | pdf | 5faeca06a75869080486cde9 | 11/13/2020 |
| Transportation of marijuana | Apothca_Transportation of Marijuana.pdf | pdf | 5faeca0c5b823307b79b7aa8 | 11/13/2020 |
| Inventory procedures | Apothca_Inventory Procedures.pdf | pdf | 5faeca14dfcf9f07cd945c4a | 11/13/2020 |
| Quality control and testing | Apothca_Quality Control and Testing.pdf | pdf | 5faeca1908242707d4a78ac1 | 11/13/2020 |
| Personnel policies including background checks | Apothca_Personnel Policies Including Background Checks_Fitchburg.pdf | pdf | 5faeca3470836208402870f6 | 11/13/2020 |
| Record Keeping procedures | Apothca_Recordkeeping Procedures.pdf | pdf | 5faeca3a0daeb60847facf5d | 11/13/2020 |
| Maintaining of financial records | Apothca_Maintaining Financial Records.pdf | pdf | 5faeca41edc7d60856d98251 | 11/13/2020 |
| Qualifications and training | Apothca_Qualifications and Training.pdf | pdf | 5faeca4b6e60eb07f57f3112 | 11/13/2020 |
| Energy Compliance Plan | Apothca_Fitchburg PM_Energy Compliance Plan.pdf | pdf | 5fc700cdaa3b3307861d03c8 | 12/01/2020 |
| Safety Plan for Manufacturing | Apothca_Safety Plan.pdf | pdf | 5fc701eb728b9907c6dd65cd | 12/01/2020 |

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 Understand

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 Agree

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 Agree

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: Apothca will always choose to hire agents from Lynn, Fitchburg, or other areas of disproportionate impact, with all else being equal. As of October 1, 2020, Apothca has a total of 93 registered agents ("Agents"). Of those 93 Agents, 32 are residents of areas of disproportionate impact. Of those 32 Agents, 12 are residents of Lynn, 8 are residents of Fitchburg, and the remaining 12 Agents are residents of other areas of disproportionate impact.

Progress or Success Goal 2

Description of Progress or Success: Unfortunately, due to the ongoing COVID-19 pandemic, Apothca has not been able to host or attend job fairs for the health and safety of our Agents and potential applicants. Once guidelines allow for safe job fairs, Apothca will once again attend or host them, as needed.

Progress or Success Goal 3

Description of Progress or Success: Again, with the COVID-19 pandemic, Apothca has not been successful in holding these events. We did attempt to hold one virtually on July 2, 2020 but attendance was limited to one participant. We will continue to evaluate the feasibility of virtual events and, if unable to hold one effectively, we will have to wait until the health guidelines allow for a safe, in-person event.

Progress or Success Goal 4

Description of Progress or Success: Apothca has tendered this donation as of October 1, 2020 and has provided an image of the processed check.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: Apothca has advertised available employment opportunities on a number of job boards including Indeed.com, AfricanAmericanHires.com, AllBilingualJobs.com, AllLGBTJobs.com, AsianHires.com, BlackCareers.com, DisabilityJobs.net, DiversityJobs.com, LatinoJobs.org, NativeJobs.com, OverFiftyJobs.com, VeteranJobs.net, and WeHireWomen.com.

Aside from those commitments, I am very proud to say that Apothca has a very diverse and representative workforce. 50% of Apothca's Board of Directors are minorities and 75% of Apothca's Executive Management Team are minorities. Additionally, out of Apothca's 93 registered agents ("Agents"), 57, or 61.3% of Apothca's Agents fall within our Diversity Plan demographics which include minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation.

Diversity Progress or Success 2

Description of Progress or Success: Unfortunately, due to the ongoing COVID-19 pandemic, Apothca has not been able to host or attend job fairs for the health and safety of our Agents and potential applicants. Once guidelines allow for safe job fairs, Apothca will once again attend or host them, as needed.

PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS

Item 1

Label Picture:

| Document Category | Document Name | Type | ID | Upload Date |
|-------------------|-----------------------------------|------|--------------------------|-------------|
| | Apothca_Product Manufacturing.pdf | pdf | 5fc70517301ec4074f754581 | 12/01/2020 |

Name of Item: N/A **Item Type:** Concentrate

Item Description: N/A

HOURS OF OPERATION

Monday From: 6:00 AM **Monday To:** 11:30 PM

Tuesday From: 6:00 AM **Tuesday To:** 11:30 PM

Wednesday From: 6:00 AM Wednesday To: 11:30 PM

Thursday From: 6:00 AM Thursday To: 11:30 PM

Friday From: 6:00 AM Friday To: 11:30 PM

Saturday From: 6:00 AM Saturday To: 11:30 PM

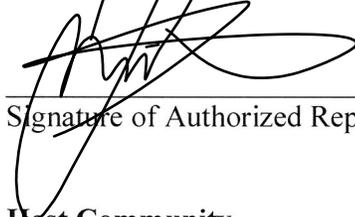
Sunday From: 6:00 AM Sunday To: 11:30 PM

Host Community Agreement Certification Form

The applicant and contracting authority for the host community must complete each section of this form before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant and/or municipality appear in italics. Please note that submission of information that is “misleading, incorrect, false, or fraudulent” is grounds for denial of an application for a license pursuant to 935 CMR 500.400(1).

Applicant

I, Joseph Lekach, (*insert name*) certify as an authorized representative of Massachusetts Patient Foundation, Inc. (*insert name of applicant*) that the applicant has executed a host community agreement with the City of Fitchburg (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on June 27, 2018 (*insert date*).



Signature of Authorized Representative of Applicant

Host Community

I, Mayor Stephen L. DiNatale, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for The City of Fitchburg (*insert name of host community*) to certify that the applicant and The City of Fitchburg (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on July 6, 2018 (*insert date*).



Signature of Contracting Authority or
Authorized Representative of Host Community

MASSACHUSETTS PATIENT FOUNDATION, INC

May 1, 2018

Re: Plan to Remain Compliant with Local Zoning

To Whom it May Concern:

As the Chief Executive Officer of Massachusetts Patient Foundation, Inc (“MPF”), a not-for-profit corporation formed under the laws of the Commonwealth of Massachusetts, I certify that MPF will remain compliant at all times with the local zoning requirements set forth in Fitchburg’s Zoning Ordinance.

Pursuant to G.L. c. 94G, s. 3(d), and given that MPF received its Provisional Certificate of Registration from the Department of Public Health for the cultivation and processing of medical marijuana at the Facility prior to July 1, 2017, Fitchburg zoning may not prevent adult-use cultivation and processing at the Facility. Furthermore, Fitchburg is in the process of passing a zoning ordinance amendment to contemplate adult-use marijuana establishments, and in all versions being considered by the Fitchburg City Council the Industrial Zone, where the Facility is located, has been identified as a zone where cultivation and processing of adult-use marijuana will be permitted.

In compliance with 935 CMR 500.110(3), the property is not located within 500 feet of an existing public or private school providing education to children in kindergarten or grades 1 through 12.

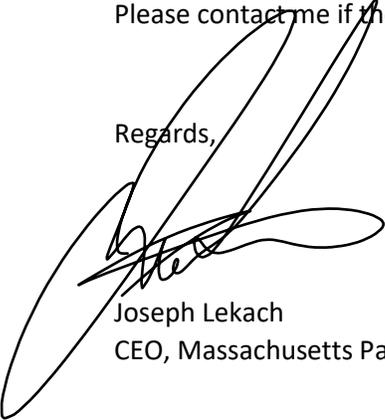
To the extent required by Fitchburg’s Zoning Ordinance, MPF will apply for a Special Permit and/or Site Plan Approval, as applicable, from the local Special Permit Granting Authority. MPF will apply for any other local permits required to operate a Cannabis Cultivation at the proposed location. MPF will comply with all conditions and standards set forth in any local permit required to operate a Cannabis Cultivation at MPF’s proposed location.

MPF has already attended several meetings with various municipal officials and boards to discuss MPF’s plans for a proposed Marijuana Cultivation and has negotiated a Host Community Agreement with the City of Fitchburg. MPF will continue to work cooperatively with various municipal departments, boards, and officials to ensure that MPF’s Marijuana Cultivation remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

MPF has also retained the law firm Vicente Sederberg LLC to assist with ongoing compliance with local zoning requirements.

Please contact me if there are any questions.

Regards,



Joseph Lekach
CEO, Massachusetts Patient Foundation, Inc.

MASSACHUSETTS PATIENT FOUNDATION, INC

m. 305-741-6540

e. joseph@artcangroup.com

Community Outreach Meeting Attestation Form

The applicant must complete each section of this form and initial each page before uploading it to the application. Failure to complete a section will result in the application being deemed incomplete. Instructions to the applicant appear in italics. Please note that submission of information that is “misleading, incorrect, false, or fraudulent” is grounds for denial of an application for a license pursuant to 935 CMR 500.400(1).

I, Joseph Lekach, (*insert name*) attest as an authorized representative of Massachusetts Patient Foundation, Inc. (*insert name of applicant*) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on April 25, 2018 (*insert date*).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on April 18, 2018 (*insert date*), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on April 17, 2018 (*insert date*) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on April 17, 2018 (*insert date*), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

5. Information was presented at the community outreach meeting including:
 - a. The type(s) of Marijuana Establishment 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 Marijuana Establishment to prevent diversion to minors;
 - d. A plan by the Marijuana Establishment to positively impact the community; and
 - e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.

6. Community members were permitted to ask questions and receive answers from representatives of the Marijuana Establishment.

Public Notice

LEGAL NOTICE

MORTGAGEE'S SALE OF REAL ESTATE
By virtue of and in execution of the Power of Sale contained in a certain mortgage given by Henry J. Manuel IR and Nancy E. Manuel to Mortgage Electronic Registration Systems, Inc. acting solely as a nominee for Taylor, Bean & Whitaker Mortgage Corp., dated August 26, 2005 and recorded in Worcester County (Northern District) Registry of Deeds in Book 5835, Page 327 (the "Mortgage"), as affected by a Loan Modification Agreement dated December 29, 2015, and recorded at said Registry of Deeds in Book 8480, Page 214 of which mortgage Nationstar Mortgage LLC d/b/a Mr. Cooper is the present holder by assignment from Mortgage Electronic Registration Systems, Inc. to Ocwen Loan Servicing, LLC dated February 2, 2011 recorded in Worcester County (Northern District) Registry of Deeds in Book 7363, Page 63 and assignment from Ocwen Loan Servicing, LLC to Nationstar Mortgage, LLC, its successors and assigns dated May 31, 2013 recorded in Worcester County (Northern District) Registry of Deeds in Book 7921, Page 193, for breach of conditions of said mortgage and for the purpose of foreclosing the same, the mortgaged premises located at 371 Burrage Street, Lunenburg, MA 01462 will be sold at a Public Auction at 11:00 AM on April 27, 2018, at the mortgaged premises, more particularly described below, all and singular the premises described in said mortgage, to wit: A certain tract of land, with the buildings thereon, containing 49,037 square feet according to a plan hereinafter mentioned, situated in Lunenburg, Massachusetts, on the northerly side of Burrage Street, being more particularly bounded and described as follows: Beginning at the most southeasterly corner thereof on the northerly side of Burrage Street at land of Ervin Glenn Barrett et ux; Thence North 58 degrees 03' 51" West 175.00 feet by Burrage Street; Thence North 10 degrees 33' 33" East 274.44 feet by land of Narbonne; Thence South 70 degrees 12' 13" East 207.92 feet by land of Barney; Thence South 34 degrees 03' 40" West 128.26 feet by land of Barrett; Thence South 7 degrees 50' 30" West 187.44 feet by last named to the point of beginning.

Said premises are shown on a plan of land entitled "Land in Lunenburg, Mass., Owned by Ervin Glenn Barrett, et ux," dated January 8, 1979, recorded in Plan Book 231, Page 5, with the Worcester County Northern District Registry of Deeds.

For mortgagor's title see deed recorded with the Worcester County (Northern District) Registry of Deeds in Book 03750, Page 010.

The premises will be sold subject to any and all unpaid taxes and other municipal assessments and liens, and subject to prior liens or other enforceable encumbrances of record entitled to precedence over this mortgage, and subject to and with the benefit of all easements, restrictions, reservations and conditions of record and subject to all tenancies and/or rights of parties in possession.

Terms of the Sale: Cash, cashier's or certified check in the sum of \$5,000.00 as a deposit must be shown at the time and place of the sale in order to qualify as a bidder (the mortgage holder and its designee(s) are exempt from this requirement); high bidder to sign written Memorandum of Sale upon acceptance of bid; balance of purchase price payable in cash or by certified check in thirty (30) days from the date of the sale at the offices of mortgagee's attorney, Korde & Associates, P. C., 900 Chelmsford Street, Suite 3102, Lowell, MA 01851 or such other time as may be designated by mortgagee. The description for the premises contained in said mortgage shall control in the event of a typographical error in this publication.

Other terms to be announced at the sale.
Nationstar Mortgage LLC d/b/a Mr. Cooper
Korde & Associates, P.C.
900 Chelmsford Street
Suite 3102
Lowell, MA 01851
(978) 256-1500
17-029587

April 4, 11, 18, 2018

MORTGAGEE'S NOTICE OF SALE OF REAL ESTATE
By virtue of and in execution of the Power of Sale contained in a certain mortgage given by Andrew Kilbreth and Mary Elen Kilbreth to Bank of America, N.A., dated February 9, 2005 and recorded with the Worcester County (Northern District) Registry of Deeds at Book 5593, Page 347, as affected by a Loan Modification recorded in said Registry of Deeds at Book 8069, Page 120 and as further affected by a Loan

Public Notice

Public Notice

COMMONWEALTH OF MASSACHUSETTS LAND COURT DEPARTMENT OF THE TRIAL COURT (SEAL)
18 SM 002078
ORDER OF NOTICE TO:

Tina L. Federline AKA Tina L. Crumblay and to all persons entitled to the benefit of the Servicemembers Civil Relief Act, 50 U.S.C. 50 §3901 (et seq); U.S. Bank National Association claiming to have an interest in a Mortgage covering real property in

Ashburnham, numbered 200 Tuckerman Road, given by Tina L. Federline to Mortgage Electronic Registration Systems, Inc., as nominee for First Eastern Mortgage Corporation, a Massachusetts Corporation, its successors and assigns, dated June 20, 2008 and recorded with the Worcester County (Northern District) Registry of Deeds at Book 6744, Page 82, as affected by a Loan Modification Agreement dated April 9, 2015 and recorded in said Registry in Book 8320, Page 194, and now held by plaintiff by assignment has/have filed with this court a complaint for determination of Defendant's/Defendants' Servicemembers status. If you now are, or recently have been, in the active military service of the United States of America, then you may be entitled to the benefits of the Servicemembers Civil Relief Act. If you object to a foreclosure of the above-mentioned property on that basis, then you or your attorney must file a written appearance and answer in this court at Three Pemberton Square, Boston, MA 02108 on or before May 14, 2018 or you will be forever barred from claiming that you are entitled to the benefits of said Act. Witness, JUDITH C. CUTLER Chief Justice of this Court on April 2, 2018

Attest: Deborah J. Patterson Recorder (17-007628 Orleans)

April 18, 2018

Commonwealth of Massachusetts The Trial Court Probate and Family Court
Worcester Probate and Family Court
225 Main Street
Worcester, MA 01608
(508)831-2200
Docket No. WD18P1178EA
CITATION ON PETITION FOR FORMAL

Public Notice

"Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for April 26th, 2018 at 6 P.M. at Eastwood Club 389 Townsend St, Fitchburg, MA 01420. The proposed marijuana retailer, manufacturer and cultivator are anticipated to be located at 774 Crawford St, Fitchburg, MA 01420. There will be an opportunity for the public to ask questions."

April 17, 18, 19, 2018

MORTGAGEE'S SALE OF REAL ESTATE
By virtue of and in execution of the Power of Sale contained in a certain mortgage given by La Fortuna, LLC to Commonwealth Equity Funding LLC, dated January 28, 2016 and recorded with the Worcester North County Registry of Deeds in Book 8495, Page 194 and assigned to PENSICO Trust Company at Book 8571, Page 239 and further assigned to Commonwealth Equity Funding LLC at Book 9025, Page 344, of which mortgage the undersigned is the present holder, for breach of the conditions of said mortgage and for the purpose of foreclosing same will be sold at public auction at 10:00 AM, on May 9, 2018 on the mortgaged premises being known as 70-78 North Street, Fitchburg, Massachusetts, being all and singular the premises described in said mortgage to wit: A certain tract of land situated in Fitchburg, Worcester County, Massachusetts on the Westerly side of North Street bounded as follows: Beginning at the southeasterly corner thereon on said street, at land now or formerly of Alvah Dufort, et ux; Thence running N. 57° 50' W. by said Dufort land one hundred thirty and 79/100 (130.79) feet to a drill hole; Thence N. 31° 46' E. seventy-one and 04/100 (71.04) feet to a stake at land now or formerly of Minnie Labarge; Thence S. 55° 51' E. by said Labarge land one hundred thirty and 85/100 (130.85) feet to a stone bound on the westerly line of North Street; Thence S. 32° 10' W. by said North Street sixty-six and 63/100 (66.63) feet to the place of beginning. Containing 9,011 square feet of land more or less, as shown on a sketch drawn by Davis & Willard, Engineers and Surveyors. Together with the right to pass and repass with teams, autos and otherwise over a strip of land six (6.00) feet in width and adjoining the southerly line of the premises above described and extending westerly from said North Street a distance of one hundred thirty and 79/100 (130.79) feet as described in deed to Alvah Dufort et ux dated May 6, 1947, recorded with Worcester County North District Registry of Deeds at Book 828, Page 593. The above premises being subject to a like right of way six (6.00) feet in width and extending along the southerly line of the granted premises for the distance of one hundred thirty and 79/100 (130.79) feet, making a common passway of twelve (12.00) feet wide. Also a certain tract of land, with the building thereon, situated on the westerly side of North Street in Fitchburg, Worcester County, Massachusetts, bounded and described as follows: Beginning at the most northeasterly corner thereof at a stone bound at said street and at land now or formerly of Martin Roddy; Thence S. 28° W. on said North Street forty (40.00) feet to a stone bound at land of Martha Shattuck, et als; Thence N. 60° W. by last named land one hundred thirty and 9/10 (130.9) feet to a stone bound at land late of Albert H. Burgess; Thence N. 28° E. by said Burgess land and land of William Howard forty (40.00) feet to a stone bound at said Roddy land; Thence S. 60° by said Roddy land one hundred thirty-one (131.00) feet to a stone bound at the place of beginning. Containing 5238 square feet of land, more or less. For title of grantor see deed recorded at the Worcester North County Registry of Deeds in Book 8495, Page 160. The above described premises will be sold SUBJECT TO and with the benefit of all restrictions, easements, improvements, covenants, conditions, building and zoning laws, to any and all unpaid taxes, tax titles, water and sewer charges, municipal or other public taxes, assessments or liens, and rights of tenants and parties in possession, if any.

TERMS OF SALE: A deposit of \$7,500.00 DOLLARS shall be paid by the successful bidder to the mortgagee in cash, by certified or by cashier's check at the time

286 Appraising

BUYING:
Antiques, Used Furniture, Tools, Collectables, China and Glass. Moving? Downsizing? We can help you sell and get CASH!! Free in home consultation and appraisals. **PARKHILL ESTATE LIQUIDATORS LIVE AND INTERNET AUCTIONS** 978-345-2022

Public Notice

238 Cement & Masonry

Sprague Masonry Restoration Specialist Design, Build, New. Stone, brick or block. Full chimney service. 30 years exp. Like us on facebook at Sprague Masonry Fully Insured. 978-340-7026

Public Notice

Commonwealth of Massachusetts The Trial Court
Probate and Family Court
Docket No. WD18C0134CA
Worcester Probate and Family Court
225 Main Street
Worcester, MA 01608
(508)831-2200
Notice of Petition for Change of Name

In the matter of Connor Richard Marchand-Jordan of Leominster, MA
To all persons interested in petition described: A petition has been presented by Kimberlee I Marchand requesting that Connor Richard Marchand-Jordan be allowed to change his name as follows: Connor Richard Marchand. If you desire to object thereto, you or your attorney must file a written appearance in said court at Worcester on or before ten o'clock in the morning (10:00 AM) on 05/15/2018
Witness, Hon. Lolah A. Keamy, First Justice of this Court.
Date: April 9, 2018
STEPHANIE K. FATTMAN
Register of Probate

April 18, 2018

NOTICE OF COMMUNITY OUTREACH MEETING MASSACHUSETTS PATIENT FOUNDATION, INC.
Notice is hereby given that Massachusetts Patient Foundation, Inc. will hold a Community Outreach Meeting on April 25, 2018 at 99 Development Road, Fitchburg, MA 01420 between 6:00 - 7:30 PM to discuss the proposed siting of an Adult Use Marijuana Cultivation and Manufacturing Facility at 89 Development Road in the City of Fitchburg in accordance with M.G.L. ch. 94G and the Massachusetts Cannabis Control Commission's regulations at 935 CMR 500.000 et seq. Topics to be discussed at the meeting will include, but not be limited to:
1. The type(s) of Adult-Use Marijuana Establishment(s) to be located at the proposed address;
2. Plans for maintaining a secure facility;
3. Plans to prevent diversion to minors;
4. Plans to positively impact the community; and
5. Plans to ensure the establishment will not constitute a nuisance to the community.
Interested members of the community are encouraged to ask questions and receive answers from Massachusetts Patient Foundation's representatives about the proposed facility and operations.
A copy of this notice has been published in a local newspaper at least seven (7) calendar days prior to the meeting and filed with the appropriate City entities. This notice was also mailed at least seven (7) calendar days prior to the meeting to abutters of the proposed address of the Marijuana Establishment, owners of land directly opposite on any public or private street or way, and abutters to the abutters within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list.

April 18, 2018

239 Chimney Repair

JOHN F. LEBLANC CHIMNEY & SLATE SERVICE
Repointing Chimney Cleaning Roof Leaks & Slate Repair New Roofs Cap Flashing Fireplace Dampers. Licensed & Ins. 8-5pm 978-603-4892
Johns call or 978-606-5293 5-11pm hours.

240 Chimney Cleaning

A QUALITY CHIMNEY GET YOUR CHIMNEY OR FURNACE FLUE CLEANED
For only \$88.00 w/ \$50 off. Chimney caps or Liners, Masonry, All Types of Concrete, Walkways, Foundation Repair, and Water Prevention. 508-752-1003

293 Furniture Repair/Refinishing

Furniture Repair & Refinished Antiques Lovingly Restored 60 years experience Call John 978-413-1481 301 6th Street Leominster towncraftsman.info

Public Notice

380 Home Remodeling

B.A.B. Construction
General Contracting, in business since 1983. Kitchen and baths a specialty. No job too big or small. Quality Guaranteed. Lic. and Insured license #10953 HIC #107458 978-345-7038

Picture Perfect Painting & Handyman Services Interior/Exterior Painting Remodeling Services Laminate & Tile install Wainscot & Crown Free Estimates References/Insured Bob: 978-407-1776

315 Landscaping & Trees

Affordable Tree & Landscape LLC
Unbelievable savings! Hazardous / Risk Assessments Tight area removals. Lot clearing, Debris Removal Pick Up & Hauling & Firearm Moving. Arborist onsite. 806 and A+ rating with Angie's list. Fully Insured. Justin Bergeron 978-766-1059 www.affordable.biz

Hydro Seeding

Fertilizing Lawn Mowing
HYDRO SEEDING 978-563-1532

John's Landscaping

Clean ups, edging, plants, flowers, mulching, lawns cut. We do it all! Dump runs included. 20 yrs experience. Free estimates. Call or text 978-332-4429

Landscaping Lawn Care Fertilizing Mowing Hydro-Seeding Aeration Dethatching Spring Clean Up Bark Mulch Tree Trimming Brush Removal Hardscapes Lawn Mowing Mosquito Spraying Grub Control

380 Stone & Gravel

STONE AND CEMENT WORK BY GERRY
March Specials Cement stairs, brick and stone stair repairs, stone walls built or repaired. 978-417-1718

452 Pets

Spay/Neuter
Low Cost Program at CLINTON VETERINARY HOSPITAL
Ask for the Certified Feline Fix 978-388-9047 www.clintonvet.com

510 Help Wanted General

EXPERIENCED ROOFERS & SHEET METAL

MECHANICS WANTED
North Worcester Contractor looking for experienced roofers and sheet metal mechanics to work on all types of roof systems. Must be dependable and ambitious with a minimum of 2 years experience. Full benefit Package. Earn up to \$80 per hour on public projects. Apply in person between 9am and 4pm Monday-Friday Rockwell Roofing, Inc. 44 Pond Street Leominster, MA 01453 Phone: 978-537-7825 Fax: 978-537-4132 EOE

LEAD PRESCHOOL TEACHER

The Guild of St. Agnes in Gardner is seeking a qualified person for this lead position. The candidate will have a bachelor degree in Early Childhood Education or a related field and be Lead Teacher qualified through the Department of Early Education and Care. Be in charge of your own classroom and work with children who need you.

The Guild offers excellent benefits including; health, dental and vision insurance, 4 weeks' vacation after one year, a 401k with a 4% employer match and much more. Contact Sharon Woodbury at woodbury@guildofstagnes.org or call 508-755-2238 x22

SERVICE MANAGER
Wagner Motor Sports Inter. a franchised Indian, BMW, Ducati, Husavarna and

Attachment B

NOTICE OF COMMUNITY OUTREACH MEETING MASSACHUSETTS PATIENT FOUNDATION, INC.

FITCHBURG CITY CLERK
2018 APR 17 PM 1:29

Notice is hereby given that Massachusetts Patient Foundation, Inc. will hold a Community Outreach Meeting on **April 25, 2018** at **99 Development Road, Fitchburg, MA 01420** between **6:00 – 7:30 PM** to discuss the proposed siting of an Adult Use Marijuana Cultivation and Manufacturing Facility at 99 Development Road in the City of Fitchburg in accordance with M.G.L. ch. 94G and the Massachusetts Cannabis Control Commission's regulations at 935 CMR 500.000 *et seq.*

Topics to be discussed at the meeting will include, but not be limited to:

1. The type(s) of Adult-Use Marijuana Establishment(s) to be located at the proposed address;
2. Plans for maintaining a secure facility;
3. Plans to prevent diversion to minors;
4. Plans to positively impact the community; and
5. Plans to ensure the establishment will not constitute a nuisance to the community.

Interested members of the community are encouraged to ask questions and receive answers from Massachusetts Patient Foundation's representatives about the proposed facility and operations.

A copy of this notice has been published in a local newspaper at least seven (7) calendar days prior to the meeting and filed with the appropriate City entities. This notice was also mailed at least seven (7) calendar days prior to the meeting to abutters of the proposed address of the Marijuana Establishment, owners of land directly opposite on any public or private street or way, and abutters to the abutters within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list.

Attachment B

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RECEIVED

APR 17 ' 18

FITCH . PLNG - CONS

Attachment B

APR 17 2018 

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MAYOR
LEGAL

Attachment B

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APR 7 18 13:37

B. O. H.

Attachment B

rec'd
@TownDesk
office

NOTICE OF COMMUNITY OUTREACH MEETING MASSACHUSETTS PATIENT FOUNDATION, INC

RECEIVED

2018 APR 7 PM 2:01

TOWN OF WESTMINSTER

Christina -
bruffan

Notice is hereby given that Massachusetts Patient Foundation, Inc. will hold a Community Outreach Meeting on **April 25, 2018 at 99 Development Road, Fitchburg, MA 01420** between **6:00 – 7:30 PM** to discuss the proposed siting of an Adult Use Marijuana Cultivation and Manufacturing Facility at 99 Development Road in the City of Fitchburg in accordance with M.G.L. ch. 94G and the Massachusetts Cannabis Control Commission's regulations at 935 CMR 500.000 *et seq.*

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Attachment B

RECEIVED
2018 APR 17 PM 2:01
TOWN OF WESTMINSTER

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Attachment B

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town planner
4-17-2018

Attachment B

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 4-17-18

Attachment C

NOTICE OF COMMUNITY OUTREACH MEETING MASSACHUSETTS PATIENT FOUNDATION, INC.

Notice is hereby given that Massachusetts Patient Foundation, Inc. will hold a Community Outreach Meeting on **April 25, 2018 at 99 Development Road, Fitchburg, MA 01420** between **6:00 – 7:30 PM** to discuss the proposed siting of an Adult Use Marijuana Cultivation and Manufacturing Facility at 99 Development Road in the City of Fitchburg in accordance with M.G.L. ch. 94G and the Massachusetts Cannabis Control Commission's regulations at 935 CMR 500.000 *et seq.*

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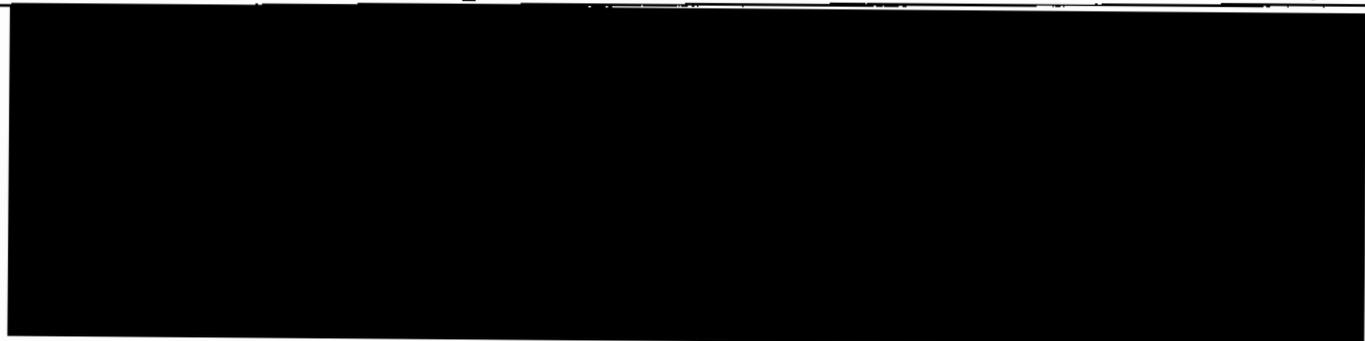
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300 FOOT ABUTTERS LIST FOR MAP 93, PARCEL 8
WESTMINSTER, MA

| 93 Map | Block | 8 Lot | Unit | 99 DEVELOPMENT ROAD LLC Owner's Name | Co_Owner's Name | 36 GLEN AVE Address | NEWTON City | MA 02459 ST Zip |
|-----------|-------|----------|------|---|-----------------|------------------------|----------------|--------------------|
|-----------|-------|----------|------|---|-----------------|------------------------|----------------|--------------------|

| | | | | | | | | |
|----|--|----|--|--|--|--|--|--|
| 93 | | 9 | | | | | | |
| 93 | | 10 | | | | | | |
| 93 | | 11 | | | | | | |
| 93 | | 12 | | | | | | |
| 93 | | 14 | | | | | | |
| 93 | | 15 | | | | | | |
| 93 | | 16 | | | | | | |
| 94 | | 1 | | | | | | |
| 94 | | 2 | | | | | | |

Record Count: 9
Parcel Count: 9



Attachment C

93



93



93



93



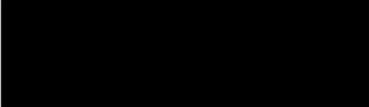
93



93



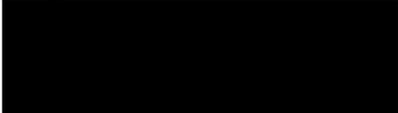
93



94



94





Kenneth J. Wilson, MAA
Christopher J. Paquette, MAA
Jerri Lynn Maillet

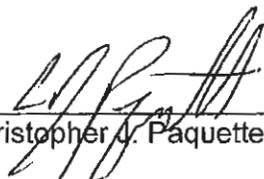
CITY OF FITCHBURG

ASSESSOR'S OFFICE

FITCHBURG, MASSACHUSETTS 01420

TO: Rebecca Rutenberg, COO
FROM: Christopher J. Paquette, Assessor
DATE: April 17, 2018
PETITION: 99 Development Drive
Map 118R Block 3 Lot f
1 Page 5 Labels

Attached please find a list of direct abutters, and abutters to abutters within three hundred feet as they appear on the most recent applicable tax list for the subject property.



Christopher J. Paquette

CJP:kaa

Attachment C

325 AUTHORITY DR

118R-3-E

LUC: 400



0 AUTHORITY DR

118R-3-E1

LUC: 403



99 DEVELOPMENT RD

118R-3-F

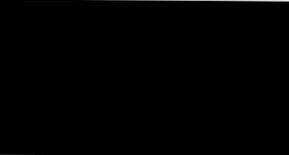
LUC: 400



46 DEVELOPMENT RD

118R-4-0

LUC: 401



310 AUTHORITY DR

118R-6-0

LUC: 400



7017 3040 0000 6852 7370

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

WEST ROXBURY, MA 02132

OFFICIAL USE

| | | |
|--|--------|------|
| Certified Mail Fee | \$3.45 | 0113 |
| | \$2.75 | 14 |
| Extra Services & Fees (check box, add fee as appropriate) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (hardcopy) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (electronic) | \$0.00 | |
| <input type="checkbox"/> Certified Mail Restricted Delivery | \$0.00 | |
| <input type="checkbox"/> Adult Signature Required | \$0.00 | |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$0.00 | |

Postage \$0.50

Total \$

Sent To

Street

City, State

PS Form 3800, November 2018

7017 3040 0000 6852 7366

U.S. Postal Service™
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FITCHBURG, MA 01420

OFFICIAL USE

| | | |
|--|--------|------|
| Certified Mail Fee | \$3.45 | 0113 |
| | \$2.75 | 14 |
| Extra Services & Fees (check box, add fee as appropriate) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (hardcopy) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (electronic) | \$0.00 | |
| <input type="checkbox"/> Certified Mail Restricted Delivery | \$0.00 | |
| <input type="checkbox"/> Adult Signature Required | \$0.00 | |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$0.00 | |

Postage \$0.50

Total \$

Sent To

Street

City, State

PS Form 3800, November 2018

7017 3040 0000 6852 7271

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NEWTON CENTER, MA 02459

OFFICIAL USE

| | | |
|--|--------|------|
| Certified Mail Fee | \$3.45 | 0113 |
| | \$2.75 | 14 |
| Extra Services & Fees (check box, add fee as appropriate) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (hardcopy) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (electronic) | \$0.00 | |
| <input type="checkbox"/> Certified Mail Restricted Delivery | \$0.00 | |
| <input type="checkbox"/> Adult Signature Required | \$0.00 | |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$0.00 | |

Postage \$0.50

Total \$

Sent To

Street

City, State

PS Form 3800, November 2018

7017 3040 0000 6852 7387

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JAFFREY, NH 03452

OFFICIAL USE

| | | |
|--|--------|------|
| Certified Mail Fee | \$3.45 | 0113 |
| | \$2.75 | 14 |
| Extra Services & Fees (check box, add fee as appropriate) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (hardcopy) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (electronic) | \$0.00 | |
| <input type="checkbox"/> Certified Mail Restricted Delivery | \$0.00 | |
| <input type="checkbox"/> Adult Signature Required | \$0.00 | |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$0.00 | |

Postage \$0.50

Total \$

Sent To

Street

City, State

PS Form 3800, November 2018

7017 3040 0000 6852 7295

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

WESTMINSTER, MA 01473

OFFICIAL USE

| | | |
|--|--------|------|
| Certified Mail Fee | \$3.45 | 0113 |
| | \$2.75 | 98 |
| Extra Services & Fees (check box, add fee as appropriate) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (hardcopy) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (electronic) | \$0.00 | |
| <input type="checkbox"/> Certified Mail Restricted Delivery | \$0.00 | |
| <input type="checkbox"/> Adult Signature Required | \$0.00 | |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$0.00 | |

Postage \$0.50

Total \$

Sent To

Street

City, State

PS Form 3800, November 2018

7017 3040 0000 6852 7288

U.S. Postal Service™
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WESTMINSTER, MA 01473

OFFICIAL USE

| | | |
|--|--------|------|
| Certified Mail Fee | \$3.45 | 0113 |
| | \$2.75 | 98 |
| Extra Services & Fees (check box, add fee as appropriate) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (hardcopy) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (electronic) | \$0.00 | |
| <input type="checkbox"/> Certified Mail Restricted Delivery | \$0.00 | |
| <input type="checkbox"/> Adult Signature Required | \$0.00 | |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$0.00 | |

Postage \$0.50

Total \$

Sent To

Street

City, State

PS Form 3800, November 2018

7017 3040 0000 6852 7349

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ATLANTA, GA 30348

OFFICIAL USE

| | | |
|--|--------|--|
| Certified Mail Fee | \$3.45 | |
| Extra Services & Fees (check box, add fee as appropriate) | \$2.75 | |
| <input type="checkbox"/> Return Receipt (hardcopy) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (electronic) | \$0.00 | |
| <input type="checkbox"/> Certified Mail Restricted Delivery | \$0.00 | |
| <input type="checkbox"/> Adult Signature Required | \$0.00 | |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$0.00 | |
| Postage | \$0.50 | |
| Total | | |
| Sent | | |
| Street | | |
| City | | |

0113 98
 Postmark Here
 APR 18 2018
 BOSTON, MA 02113

7017 3040 0000 6852 7325

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FITCHBURG, MA 01420

OFFICIAL USE

| | | |
|--|--------|--|
| Certified Mail Fee | \$3.45 | |
| Extra Services & Fees (check box, add fee as appropriate) | \$2.75 | |
| <input type="checkbox"/> Return Receipt (hardcopy) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (electronic) | \$0.00 | |
| <input type="checkbox"/> Certified Mail Restricted Delivery | \$0.00 | |
| <input type="checkbox"/> Adult Signature Required | \$0.00 | |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$0.00 | |
| Postage | \$0.50 | |
| Total | | |
| Sent | | |
| Street | | |
| City | | |

0113 98
 Postmark Here
 APR 18 2018
 BOSTON, MA 02113

7017 3040 0000 6852 7394

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FITCHBURG, MA 01420

OFFICIAL USE

| | | |
|--|--------|--|
| Certified Mail Fee | \$3.45 | |
| Extra Services & Fees (check box, add fee as appropriate) | \$2.75 | |
| <input type="checkbox"/> Return Receipt (hardcopy) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (electronic) | \$0.00 | |
| <input type="checkbox"/> Certified Mail Restricted Delivery | \$0.00 | |
| <input type="checkbox"/> Adult Signature Required | \$0.00 | |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$0.00 | |
| Postage | \$0.50 | |
| Total | | |
| Sent | | |
| Street | | |
| City | | |

0113 98
 Postmark Here
 APR 18 2018
 BOSTON, MA 02113

7017 3040 0000 6852 7301

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

WESTMINSTER, MA 01473

OFFICIAL USE

| | | |
|--|--------|--|
| Certified Mail Fee | \$3.45 | |
| Extra Services & Fees (check box, add fee as appropriate) | \$2.75 | |
| <input type="checkbox"/> Return Receipt (hardcopy) | \$0.00 | |
| <input type="checkbox"/> Return Receipt (electronic) | \$0.00 | |
| <input type="checkbox"/> Certified Mail Restricted Delivery | \$0.00 | |
| <input type="checkbox"/> Adult Signature Required | \$0.00 | |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$0.00 | |
| Postage | \$0.50 | |
| Total | | |
| Sent | | |
| Street | | |
| City | | |

0113 98
 Postmark Here
 APR 18 2018
 BOSTON, MA 02113

SENDER: COMPLETE THIS SECTION

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

2. Article Number (Transfer from service label)
 9590 9402 3001 7124 8589 97

7017 3040 0000 6852 7387

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent
- B. Received by (Printed Name) Addressee
- C. Date of Delivery
- D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

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

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent
- B. Received by (Printed Name) Addressee
- C. Date of Delivery
- D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

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

Domestic Return Receipt

PS Form 3811, July 2015 PSN 7530-02-000-9053

SENDER: COMPLETE THIS SECTION

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

2. Article Number (Transfer from service label)
 9590 9402 3001 7124 8591 09

7017 3040 0000 6852 7301

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent
- B. Received by (Printed Name) Addressee
- C. Date of Delivery
- D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

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

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent
- B. Received by (Printed Name) Addressee
- C. Date of Delivery
- D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

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

Domestic Return Receipt

PS Form 3811, July 2015 PSN 7530-02-000-9053

| | |
|---|---|
| <p>SENDER: COMPLETE THIS SECTION</p> <ul style="list-style-type: none"> <input type="checkbox"/> Complete items 1, 2, and 3. <input type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits. <div style="border: 1px solid black; width: 100px; height: 100px; margin: 10px auto;"></div> <p>2. Article Number (Transfer from service label) 7017 3040 0000 6852 7394</p> <p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p> | <p>COMPLETE THIS SECTION ON DELIVERY</p> <p>A. Signature </p> <p>B. Received by (Printed Name) Deborah Cuthbert</p> <p>C. Date of Delivery 4/23/18</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> |
| <p>SENDER: COMPLETE THIS SECTION</p> <ul style="list-style-type: none"> <input type="checkbox"/> Complete items 1, 2, and 3. <input type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits. <div style="border: 1px solid black; width: 100px; height: 100px; margin: 10px auto;"></div> <p>2. Article Number (Transfer from service label) 7017 3040 0000 6852 7394</p> <p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p> | <p>COMPLETE THIS SECTION ON DELIVERY</p> <p>A. Signature </p> <p>B. Received by (Printed Name) Robert Strossi</p> <p>C. Date of Delivery 4/19/18</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> |

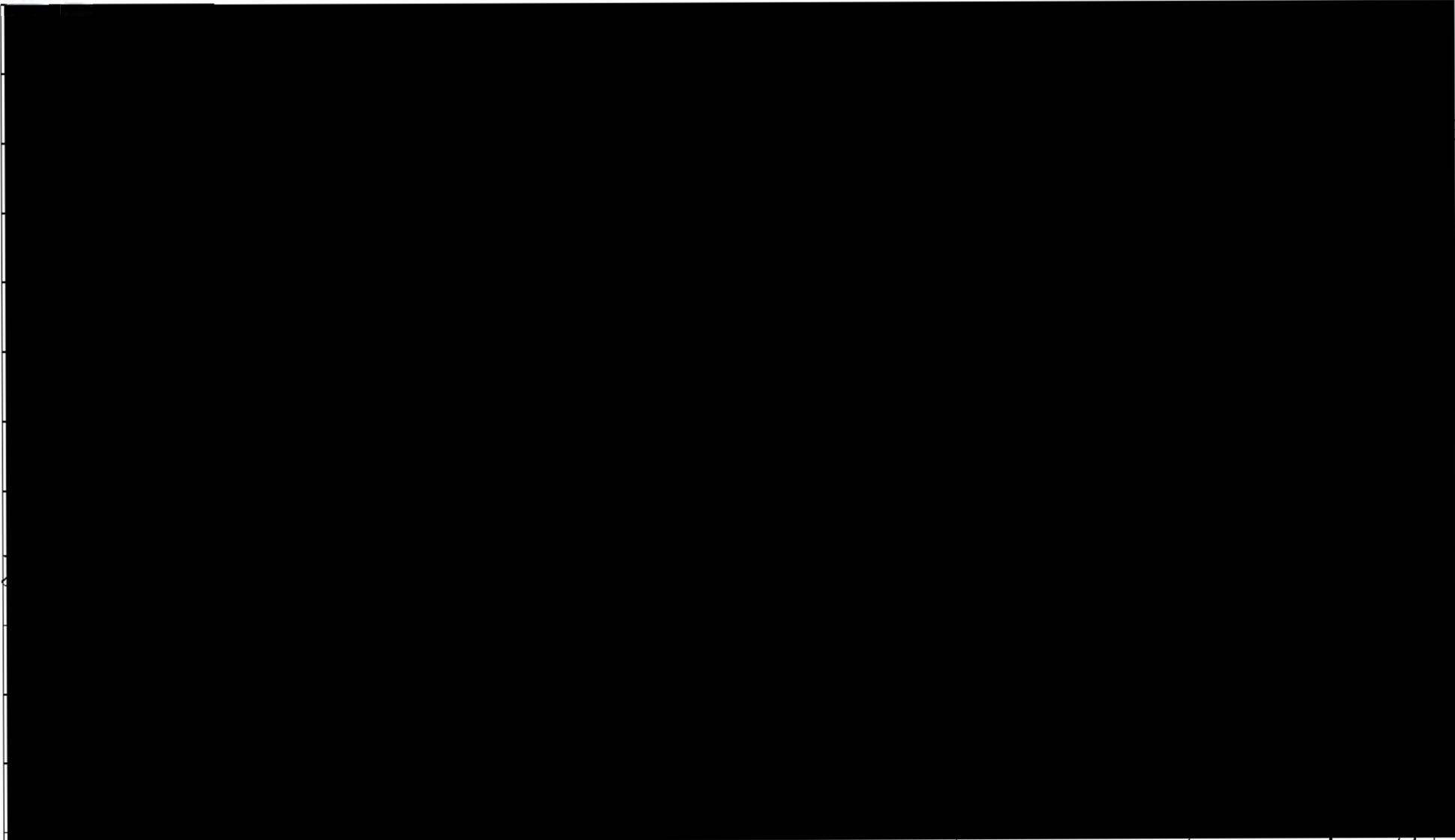
| | |
|---|--|
| <p>SENDER: COMPLETE THIS SECTION</p> <ul style="list-style-type: none"> <input type="checkbox"/> Complete items 1, 2, and 3. <input type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits. <div style="border: 1px solid black; width: 100px; height: 100px; margin: 10px auto;"></div> <p>9590 9402 3001 7124 8586 52</p> <p>2. Article Number (Transfer from service label) 7017 3040 0000 6852 7370</p> <p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p> | <p>COMPLETE THIS SECTION ON DELIVERY</p> <p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) Robert Strossi</p> <p>C. Date of Delivery 4-19-18</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> |
| <p>3. Service Type</p> <ul style="list-style-type: none"> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery | <p>Domestic Return Receipt</p> |

Attachment C

Name

Phone Number

Email Address



| | | |
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| | | |
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| | | |

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can

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VICENTE SEDERBERG

BOSTON | DENVER | JACKSONVILLE | LOS ANGELES LLC

2 SEAPORT LANE, 11TH FLOOR
BOSTON, MA 02210
TEL: 617.934.2121

September 28, 2018

Massachusetts Cannabis Control Commission
101 Federal Street, 13th Floor
Boston, MA 02110

Re: Clarification Related to Role of Dr. Mike Cusnir

To Whom It May Concern:

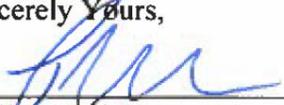
The Cannabis Control Commission (the “Commission”) requested additional information from Massachusetts Patient Foundation, Inc. (“MPF”) on August 9, 2018, including clarification regarding the role of Dr. Mike Cusnir. At the time of the community outreach meeting, Dr. Cusnir was serving strictly in an advisory role. Dr. Cusnir served in none of the following roles:

- As an executive, manager, or other person having direct or indirect authority over the management, policies, security operations or cultivation operations of MPF;
- As an individual with relevant managerial, operational, or financial interest in MPF and, by virtue of that interest or power, was able to exercise a significant influence over the management, operations or finances of MPF; or
- As a capital contributor of 10% or more of the initial capital to operate MPF (including capital that is in the form of land or buildings).

Regardless, Dr. Cusnir is no longer affiliated with MPF, and as such, he does not need to be disclosed on the application.

Please do not hesitate to contact us with any further questions.

Sincerely Yours,



Philip C. Silverman, Esq.

Joseph Lekach

From: Joseph Lekach
Sent: Friday, September 11, 2020 12:48 PM
To: mayor@fitchburgma.gov
Cc: vpusateri@pusaterilaw.com; philsilverman@vicentesederberg.com
Subject: Apothca Medical License Renewal

Re: Request for Records of Costs Related to Apothca's Fitchburg Operations

Dear Mr. DiNatale,

Please be advised that as a condition of Apothca, Inc.'s ("Apothca") license renewal approval for its marijuana establishment in the City of Fitchburg ("Fitchburg" or "City"), the Cannabis Control Commission (the "Commission") is requiring Apothca to submit, within 90 days of expiration, (1) documentation that it requested from its Host Community the records of any cost to the City, whether anticipated or actual, resulting from the licensee's operation within its borders, and (2) any response received from the Host Community in connection with such request, and if no response is received, an attestation to that effect.

Accordingly, please accept this correspondence as Apothca's formal request to the City to produce the records of any cost, whether anticipated or actual, resulting from Apothca's operation within the City. Please note that a copy of this correspondence along with any response received from the City, or barring receipt of any response, an attestation to that effect, shall be submitted by Apothca to the Commission. As the City is aware, in accordance with M.G.L. c. 94G, § 3(d), any cost to the City imposed by the operation of a Marijuana Establishment shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Apothca respectfully requests that the City respond to this request as soon as possible, but in no event later than September 25, 2020, so that Apothca can timely comply with the conditions of its license renewal.

If we can provide additional information, please do not hesitate to ask.

Best,
Joseph Lekach



Joseph Lekach
Chief Executive Officer
M. 305.741.6540
www.Apothca.com

City of Fitchburg
Law Department
Matter #: 1599a-02

| Date | Matter # | Matter Name | Received From/Paid To | Explanation |
|-------------|----------|-------------|-------------------------------|---|
| Feb 22/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Massachusetts Patient Foundation: Meeting |
| Mar 17/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Revolutionary Clinics: Meeting with David Vining |
| Mar 23/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Revolutionary Clinics: Meeting with Revolutionary Clinics |
| Mar 23/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Revolutionary Clinics: Meeting with Revolutionary Clinics |
| Mar 26/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Revolutionary Clinics: Email to Jayne Vining |
| Apr 8/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Revolutionary Clinics: Email from Ryan Ansin |
| Apr 9/2016 | 1599a-02 | Marijuana | Lawyer: vpp 2.00 Hrs X 250.00 | Massachusetts Patient Foundation: Draft Host Community Agreement; draft HCA letter; email to Valerio Romano |
| Apr 13/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Revolutionary Clinics: Contact with Ryan Ansin; emails from Ryan Ansin |
| Apr 15/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Massachusetts Patient Foundation: Revise HCA |
| Apr 16/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Massachusetts Patient Foundation: Review HCA |
| Apr 16/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Review HCA and letter |
| Apr 18/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 250.00 | Revolutionary Clinics: Emails from Ryan Ansin |
| May 3/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Garden Remedies: Meeting |
| May 4/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.50 Hrs X 250.00 | Massachusetts Patient Foundation: email from and to Valerio Romano; revise HCA |
| May 9/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Massachusetts Patient Foundation: Meeting |
| May 13/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Atty Fine |
| May 19/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Garden Remedies: Tour facility with Attorney Dombrowski |
| May 27/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.33 Hrs X 250.00 | Massachusetts Patient Foundation: Email to Atty Fine & Silverman regarding HCA |
| May 27/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.75 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Brandon Kurtzman with HCA; review the same |
| May 27/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Adam Fine |
| May 28/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Atty Fine |
| May 28/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email to Atty Fine |
| May 31/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: email to Atty Fine & Silverman |
| May 31/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Emails |
| Jun 3/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Atty Fine |
| Jun 10/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Garden Remedies: Email from Mike O'Hara |
| Jun 23/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Revolutionary Clinics: Emails from Liberty Vining; review letter of Non-Opposition |
| Jun 28/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Liberty Vining |
| Jun 29/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Revolutionary Clinics: Email from Liberty Vining |
| Jun 30/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Revolutionary Clinics: Email from Liberty Vining; contact with Liberty Vining |
| Jul 1/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Massachusetts Patient Foundation: Revise MPF HCA; email to Atty Silverman |
| Jul 27/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 250.00 | Revolutionary Clinics: Email from Liberty Vining; review letter from DPH |
| Jul 27/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Revolutionary Clinics: Email from Liberty Vining |
| Aug 3/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Revolutionary Clinics: Email from Bert Vining |
| Aug 4/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email to Atty Silverman |
| Aug 5/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Massachusetts Patient Foundation: Review HCA with Mayor's Office; contact with Atty Silverman |

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|-------------|----------|-----------|-------------------------------|---|
| Aug 5/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email to Atty Silverman |
| Aug 8/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Revolutionary Clinics: Email from Bert Vining; call to BertVining |
| Sep 2/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Massachusetts Patient Foundation: Review HCA with Mayor's Office; email to Atty Silverman |
| Sep 2/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Atty Silverman |
| Sep 6/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Atty Silverman |
| Sep 13/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Paula Caron; review Special Permit edits/revisions/suggestions |
| Sep 15/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Review Special Permit process |
| Sep 27/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Atty Silverman with revisions |
| Nov 6/2016 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Atty Silverman; revise HCA |
| Nov 21/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Revolutionary Clinics: Email from Bert Vining |
| Nov 23/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 250.00 | Revolutionary Clinics: Email to Bert Vining |
| Nov 23/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Revolutionary Clinics: Email from Bert Vining |
| Nov 28/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Atty Silverman; review HCA |
| Nov 29/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Atty Silverman |
| Nov 29/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Atty Silverman |
| Nov 30/2016 | 1599a-02 | Marijuana | Lawyer: vpp 2.00 Hrs X 250.00 | Massachusetts Patient Foundation: Revise HCA; email to Atty Silverman with edits |
| Nov 30/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Atty Silverman |
| Nov 30/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 250.00 | Massachusetts Patient Foundation: Email to Atty Silverman |
| Dec 5/2016 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 250.00 | Massachusetts Patient Foundation: Review HCA; email from Atty Silverman |
| Dec 5/2016 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 250.00 | Massachusetts Patient Foundation: Email from Phil Silverman |
| Jan 10/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 250.00 | Atlantic Medicinal Partners: Email from Atty Silverman |
| Jan 11/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.00 Hrs X 250.00 | Massachusetts Patient Foundation: Special Permit Deadline |
| Jan 12/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 250.00 | Revolutionary Clinics: Email from Bert Vining with HCA |
| Jan 16/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.00 Hrs X 250.00 | Revolutionary Clinics: Special Permit Deadline |
| Jan 17/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 250.00 | Natural Selections: Email from Aidan O'Donovan |
| Feb 6/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Garden Remedies: Email to Attorney Dombrowski |
| Feb 16/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Ryan Ansin |
| Feb 23/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Garden Remedies: Email to Attorney Dombrowski |
| Mar 3/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Massachusetts Patient Foundation: Review Special Permit; emails from Mayor's Office and Michael O'Hara |
| Apr 19/2017 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Garden Remedies: Meeting |
| Apr 24/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Garden Remedies: Email from Karen Munkacy |
| May 1/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Liberty Vining |
| May 19/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Jayne Vining |
| May 26/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Mayor DiNatale |
| Jun 13/2017 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Massachusetts Patient Foundation: Meeting with Attorney Silverman |

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|-------------|----------|-----------|-------------------------------|--|
| Jun 19/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.33 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Phil Silverman; Review Recreational Operations and Special Permit |
| Jul 17/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call from Joseph Lekach |
| Aug 8/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Mayor's Office |
| Aug 15/2017 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Mike O'Hara, email to Mike O'Hara |
| Aug 16/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Attorney Tree |
| Aug 16/2017 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Attorney Tree, review Host Community Agreement comments/suggestions |
| Aug 18/2017 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Paula Caron |
| Aug 24/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Michael O'Hara |
| Aug 24/2017 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Mike O'Hara |
| Sep 18/2017 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Garden Remedies: Meeting |
| Nov 4/2017 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Revolutionary Clinics: Meeting with Bert Vining |
| Nov 10/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Michael O'Hara |
| Dec 11/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Bert Vining |
| Dec 16/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Massachusetts Patient Foundation: Review Zoning Ordinance; contact with Mayor's Office and Attorney Silverman |
| Dec 18/2017 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Atlantic Medicinal Partners: Review HCA; email from Atty Silverman |
| Jan 9/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Atlantic Medicinal Partners: Meeting with AMP |
| Jan 9/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Atlantic Medicinal Partners: Email from Atty Silverman |
| Jan 23/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Atlantic Medicinal Partners: Email from Attorney Silverman |
| Feb 23/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Phil Silverman, conference call with Phil Silverman |
| Feb 23/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| Mar 2/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| Mar 7/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Bert Vining |
| Mar 18/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Massachusetts Patient Foundation: Review HCA's with Attorney Tree |
| Mar 18/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Massachusetts Patient Foundation: Emails from Phil Silverman, emails to Phil Silverman |
| Mar 19/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| Mar 21/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Michael O'Hara |
| Mar 27/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| Mar 28/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Phil Silverman |
| Mar 28/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| Mar 29/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| Mar 30/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.33 Hrs X 300.00 | Massachusetts Patient Foundation: Emails from and to Attorney Silverman and Tree |

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|-------------|----------|-----------|-------------------------------|--|
| Mar 30/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Garden Remedies: Drafted HCA, email to Jim Smith |
| Mar 30/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Massachusetts Patient Foundation: Drafted HCA, email to Phil Silverman |
| Mar 30/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| Apr 2/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Garden Remedies: Review Host Agreement and email to Jim Smith |
| Apr 2/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Attorney Tree |
| Apr 2/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Attorney Tree |
| Apr 2/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Garden Remedies: Revise HCA, email to Jim Smith |
| Apr 2/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Massachusetts Patient Foundation: Emails to and from Phil Silverman |
| Apr 3/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Garden Remedies: Email from Jeffrey Herold |
| Apr 3/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.33 Hrs X 300.00 | Garden Remedies: Returned call to Sira Grant |
| Apr 5/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.60 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| Apr 9/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Garden Remedies: Review HCA, provide summary of provisions to Mayor's Office |
| Apr 13/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| Apr 18/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Phil Silverman |
| Apr 20/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Bert Vining |
| Apr 23/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Bert Vining |
| Apr 24/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Phil Silverman |
| Apr 25/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Bert Vining |
| Apr 30/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Phil Silverman |
| May 1/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| May 2/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Attorney Tree |
| May 8/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Revolutionary Clinics: Call from Bert Vining; email from Bert Vining |
| May 8/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| May 9/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Attorney Tree |
| May 10/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Attorney Silverman |
| May 14/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Bert Vining |
| May 14/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Bert Vining |
| May 14/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| May 25/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Emails regarding wiring funds MPF |
| May 25/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Garden Remedies: Email from Mike O'Hara |
| May 25/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Emails to and from Anne Cervantes |
| May 25/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Phil Silverman |
| May 25/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| Jun 7/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email to Attorney Silverman |

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|-------------|----------|-----------|-------------------------------|---|
| Jun 12/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Revolutionary Clinics: Email to Jim Smith |
| Jun 13/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Jim Smith |
| Jun 14/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Phil Silverman |
| Jun 14/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Phil Silverman |
| Jun 16/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.40 Hrs X 300.00 | Massachusetts Patient Foundation: Phone call with Phil Silverman |
| Jun 19/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email to Mayor's Office |
| Jun 21/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Emails from Phil Silverman |
| Jun 24/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.33 Hrs X 300.00 | Massachusetts Patient Foundation: Email to Phil Silverman |
| Jun 27/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Review and email with Non-Medical HCA to Mayor's Office |
| Jul 3/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Revolutionary Clinics: Meeting with Revolutionary Clinics |
| Jul 6/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email to Phil Silverman |
| Jul 6/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Phil Silverman |
| Jul 9/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Massachusetts Patient Foundation: Emails from Phil Silverman, emails to Phil Silverman |
| Jul 11/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.50 Hrs X 300.00 | Revolutionary Clinics: Call and emails to and from Bert Vining |
| Jul 12/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Revolutionary Clinics: Meeting with Revolutionary Clinics |
| Jul 24/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.00 Hrs X 300.00 | Revolutionary Clinics: Email to Mayor's Office |
| Aug 9/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Bert Vining |
| Aug 9/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Ryan Ansin |
| Aug 13/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Mayor's Office |
| Aug 15/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | New Era Email |
| Aug 16/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from Jack Carney |
| Aug 17/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Garden Remedies: Email from Mayor's Office with HCA |
| Aug 20/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Phone call with Jack Carney, Green Era |
| Aug 21/2018 | 1599a-02 | Marijuana | Lawyer: vpp 3.50 Hrs X 300.00 | Attendance of Planning Board, Meeting dedicated solely to marijuana |
| Aug 22/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Contact Regar Constituant Initiative |
| Aug 22/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Meeting with A.F. re initiative |
| Aug 22/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.75 Hrs X 300.00 | Phone call with constituents, phone call with Chief Martineau, Ann Farrel email, email constituents |
| Aug 23/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Emails, calls returned to reporter from WBUR re host agreements, CCC guidance. |
| Aug 23/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.30 Hrs X 300.00 | Research, review, email outlining petition procedure for marijuana bans or limitations to VP2. |
| Aug 23/2018 | 1599a-02 | Marijuana | Lawyer: vpp 3.00 Hrs X 300.00 | Meeting and A.F. relative to Initiative petition. Research of Petition Process and new statute |
| Aug 23/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.20 Hrs X 300.00 | Correction to BUR |
| Aug 24/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Various emails from constituents/clerk regarding initiative petition |
| Aug 24/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Press release meeting, call to sentinel, left voice mail |
| Aug 24/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Correspondence re WBUR article on host agreements. |
| Aug 24/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Email to Amanda Burke re questions on host agreements. |
| Aug 25/2018 | 1599a-02 | Marijuana | Lawyer: vpp 2.00 Hrs X 300.00 | Review Host Agreement Issues |

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|-------------|----------|-----------|-------------------------------|--|
| Aug 26/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.20 Hrs X 300.00 | Draft and forward proposed nonmedical host agreement for Compassionate Organics. |
| Aug 27/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Email from AJ Tourigny re marijuana fee payment letter, review proposed revision in language and respond. |
| Aug 27/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Garden Remedies: Email from Mayor's Office |
| Aug 28/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.40 Hrs X 300.00 | Phonecall returned to Amanda Burke from S&E re questions on host agreements. |
| Aug 28/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.70 Hrs X 300.00 | Review and discussion of Emerson/Koontz line of cases with MC re host agreements. |
| Aug 29/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.30 Hrs X 300.00 | Meeting with Catherine Trifilo, Carol Vittorioso re possible marijuana retailer. |
| Aug 30/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.80 Hrs X 300.00 | Review possible revisions in host agreement language with VP2. |
| Aug 30/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | New Era Call |
| Aug 30/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from CCC |
| Aug 31/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Confernece with Planning Department relative to the ordinance and US Holdign agreement, review news coverage regarding CCC, acll to chief Martineau relative tomoral |
| Sep 4/2018 | 1599a-02 | Marijuana | Lawyer: vpp 2.50 Hrs X 300.00 | Green Era Meeting with Businessrelative to Compliance with order and format of the application, email from Chief Martineau re: Cori & Others |
| Sep 5/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Review proposed locations, email response to Catherine Trifilo re possible retail marijuana facility. |
| Sep 6/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.50 Hrs X 300.00 | Meeting with Green Era RE Application |
| Sep 6/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Phone call from Planning Department with a variety of concerns with the Appellate Process |
| Sep 10/2018 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 125.00 | Edit marijuana spreadsheet |
| Sep 10/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Email Green Era |
| Sep 10/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.20 Hrs X 300.00 | Phone call with planning department re: Nsajo |
| Sep 11/2018 | 1599a-02 | Marijuana | Lawyer: vpp 3.00 Hrs X 300.00 | Phone call with Nsajo, attending planning board meeting |
| Sep 13/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics |
| Sep 13/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Meeting with Sugar Leaf |
| Sep 13/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Email from/to Jack |
| Sep 14/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Discussion of various provisions for HCA agreements with VP2. |
| Sep 18/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.50 Hrs X 300.00 | Attend meeting re CAS foundation opening. |
| Sep 18/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Email re: Citizens Petition |
| Sep 19/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | PHone call Jim Smith re: Certification Form |
| Sep 21/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Phonecall returned to Carol Vittorioso re Trifilo HCA proposal. |
| Sep 22/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.40 Hrs X 300.00 | Revisions drafted and proposed to VP2 on standard retail host agreement. |
| Sep 23/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Revision of Trifilo retail host agreement re VP2 comments. |
| Sep 24/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Emails to/from Atty. Vitorioso forwarding agreement. |
| Sep 27/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Phone call David Ullian |
| Sep 28/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.40 Hrs X 300.00 | Phonecall with Carol Vittoriosore siting of facility, questions on agreement. |
| Sep 28/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Emails regarding Stalk and Beans from David Ullian |
| Oct 2/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.60 Hrs X 300.00 | Review issue on submission of ordinance for prohibition of marijuana re citizen petition/city Council, cross-reference charter provisions. |
| Oct 2/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Bert Vining |

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| Oct 3/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.90 Hrs X 300.00 | Review and revise host agreement for Catherine Trifilo; email to ME and Atty. Vittorioso; email to MOH re potential issue on shared driveway. |
| Oct 3/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Eastern Airlooms Meeting |
| Oct 3/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Canaberg Meeting |
| Oct 4/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.40 Hrs X 300.00 | Phonecall, email from Fresh Connection re possible cultivation and manufacturing ME, host agreement. |
| Oct 10/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Review, revise Blue Colony Botany HCA. |
| Oct 10/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Draft FreshConnections HCA. |
| Oct 12/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Review of Social Equity Program provisions. |
| Oct 12/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Phonecall from Atty. Vittorioso reviewing status and further process on Catherine Trifilo HCA. |
| Oct 12/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Application meeting with Planning Department |
| Oct 12/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Meeting with Nealon & Ford regarding social equity issues |
| Oct 19/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Review proposed GR host fee request. |
| Oct 19/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.80 Hrs X 300.00 | Review and revise proposed Compassionate Care HCA; email and review with AJ. |
| Oct 22/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Mtg with Adrian Ford & Barbara Nealon |
| Oct 22/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Emails with Jack Carney |
| Oct 27/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Phone call with Jack Carney; review of HCA |
| Oct 28/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.40 Hrs X 300.00 | Revision of social equity paragraph amendment to HCA's. |
| Oct 29/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Draft proposed social equity letter. |
| Oct 30/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Meeting with Barbara Nealon and Adrian Ford |
| Oct 31/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.60 Hrs X 300.00 | Email to MaryJo Bohart re the need for a HCA with medical or nonmedical testing laboratories. |
| Oct 31/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.50 Hrs X 300.00 | Revision of Caregiver Patient HCA; phonecall returned to Atty. Vittorioso; draft proposed Order and forward to AJ. |
| Oct 31/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.70 Hrs X 300.00 | Review, revise Green Era host agreement. |
| Nov 5/2018 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Meeting with Will Sicard |
| Nov 5/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Mayor's Office |
| Nov 5/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Mayor's Office |
| Nov 8/2018 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Drafting HCA for Green Era |
| Nov 9/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Phonecall from Atty. Vittorioso special permit hearing, status of HCA before City Council; email to Atty. Vittorioso. |
| Nov 11/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Review NS AJO host agreement and draft letter agreeing to adjustment |
| Nov 15/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.50 Hrs X 300.00 | Revise Green Era and Blue Botany HCA's, draft orders and submit for City Council. |
| Nov 28/2018 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 125.00 | To City Hall to notarize HCA for Green Era; print invoices for Green Era and Caregiver-Patient Connection |
| Nov 29/2018 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 125.00 | Edit HCA for Green Era's John Fitch Highway location; prepare and send order and HCA to Anna Farrell for council review; email same to Jack Carney and AJ |
| Dec 10/2018 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Meeting with Marijuana Lab Company (ATC) with AJ |
| Dec 10/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Phonecall from Carol Vittorioso delay in special permit application for Planning Board. |
| Dec 14/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Begin drafting of ACT Laboratories HCA. |
| Dec 15/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.80 Hrs X 300.00 | Complete review and drafting of HCA for ACT Laboratories; send to VP2 for review. |
| Dec 17/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Email to and from Barbara Nealon |

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| Dec 20/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.25 Hrs X 300.00 | NSAJO Holdings Email and Accounting |
| Dec 27/2018 | 1599a-02 | Marijuana | Lawyer: ct 1.30 Hrs X 300.00 | Review of issues and questions on ACT HCA with VP2; redrafting of ACT Laboratories HCA per discussion with VP2. |
| Dec 28/2018 | 1599a-02 | Marijuana | Lawyer: ct 3.50 Hrs X 300.00 | Review new regulations issued by CCC re transfer of operations from DPH, regulation of medical marijuana; emails to Phil Silverman re Stalk & Beans re operations profile and entity as RMD Agent; review and revise Stalk & Beans HCA and forward for review. |
| Dec 28/2018 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Phone call with Attendance at court Labs; review HCA; send HCA to Jeff Nemeth |
| Dec 31/2018 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Review/revise MPF letter for AJ Tourigny. |
| Jan 2/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Garden Remedies: Email from Marcus DiNatale |
| Jan 4/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 125.00 | Review current Host Agreements; list of outstanding Host Agreements; |
| Jan 4/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Email to Aidan O'Donovan |
| Jan 4/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | NS AJO Holdings Account Issues |
| Jan 4/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Phil Silverman, review municipal response |
| Jan 4/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Massachusetts Patient Foundation: Email from Phil Silverman, email from Mayor's Office |
| Jan 6/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.50 Hrs X 300.00 | Review, revisions to Stalk & Beans HCA, emails to Phil Silverman, Barbara Nealon re HCA, Social Equity provisions. |
| Jan 8/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.25 Hrs X 300.00 | Email to Brian A. from Fitchburg Newport, LLC |
| Jan 9/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Redraft Fitchburg Newport HCA, email to proposed ME. |
| Jan 14/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Phone conference with Ben Nero re Eastern Heirlooms HCA. |
| Jan 15/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Review, revise drafted letter to NSAJO re modification of HCA. |
| Jan 16/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 125.00 | Review, revise and edit letter to Atty Ross; send to AJ for review |
| Jan 16/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 0.00 | Review and revise letter to Atty Ross RE: Natural Selections |
| Jan 16/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.40 Hrs X 300.00 | Email from AJ re Garden Remedies due date adjustment, review HCA, respond. |
| Jan 17/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Garden Remedies: Emails from Mayor's Office, email to Tara Hopper |
| Jan 22/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Emails, phonecall with Ben Nero re Eastern Heirlooms. |
| Jan 22/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.70 Hrs X 300.00 | Review and revision of proposed Revolutionary Clinics HCA amendment and letter, updated CCC issued guidance. |
| Jan 22/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.50 Hrs X 300.00 | Revolutionary Clinics: Emails from Bert Vining, phone call with Bert Vining, email from Mary Jo Bohart |
| Jan 23/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.40 Hrs X 300.00 | Phonecall with Ben Nero re Eastern Heirlooms HCA. |
| Jan 28/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from Attorney Radigan |
| Jan 28/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from Bert Vining |
| Jan 29/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from Attorney Vittorioso |
| Jan 29/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Garden Remedies: Email from Mayor's Office |
| Feb 1/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Phonecall to Bert Vining re proposed modification to Revolutionary Clinics HCA. |
| Feb 3/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Review and revision of Eastern Heirlooms proposal. |
| Feb 3/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Draft Revolutionary Clinics HCA modification letter; review existing HCA agreements. |

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| Feb 4/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Eastern Heirlooms HCA/review community impact letter. |
| Feb 4/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.40 Hrs X 300.00 | HCA modification letter Revolutionary clinics. |
| Feb 4/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Revolutionary Clinics: Draft amended HCA proposal; Email to Bert Vining |
| Feb 6/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.75 Hrs X 300.00 | Phone call with Attorney Hopper from Garden Remedies and draft Addendum to their HCA |
| Feb 7/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.75 Hrs X 300.00 | Meeting with Phil Silverman and True Nature Wellness |
| Feb 7/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Conference call with Attorney Napoli |
| Feb 7/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Phonecall returned to Atty. Vittorioso re Caregiver Patient Special Permit issue. |
| Feb 11/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Emails to/from AJ re NSAJO commencement payment, phonecall to Atty. Mike Ross re commencement payments. |
| Feb 12/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Email forwarding Eastern Heirlooms submission for review. |
| Feb 12/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Massachusetts Patient Foundation: Email to Phil Silverman, review payments; email from Mayor's Office |
| Feb 13/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Phonecall from Paula Caron re lack of special permit for MPF non-medical use. |
| Feb 14/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Review response to public records request re marijuana companies. |
| Feb 14/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Meeting with Taba Wellness |
| Feb 14/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Public Records Request, email to Petrini and calls |
| Feb 14/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Revolutionary Clinics: Email to Bert Vining |
| Feb 15/2019 | 1599a-02 | Marijuana | Lawyer: ct 3.50 Hrs X 300.00 | Review and formulate response to marijuana public records request |
| Feb 15/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Phone call to Phil Silverman re finalization of Stalk & Beans submission. |
| Feb 15/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Phone call from AJ re public records request. |
| Feb 15/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Conference call with Attorney Sacks |
| Feb 15/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Marijuana Public Records Request |
| Feb 15/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Revolutionary Clinics: Email from Bert Vining; review HCA Amendment comments/suggestions |
| Feb 15/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Revolutionary Clinics: Email from Bert Vining |
| Feb 18/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Review and research re public records request; draft letter requesting extension of time. |
| Feb 19/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.60 Hrs X 300.00 | Meet with VP re public records request response. |
| Feb 19/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Email response on Apothca payment issue. |
| Feb 19/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Meeting with Lt. Jordan re public records request disclosure and issues re trade secrets of marijuana companies. |
| Feb 19/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Emails to and from Captain Giannini |
| Feb 19/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Marijuana, email re: public records |
| Feb 20/2019 | 1599a-02 | Marijuana | Lawyer: dm 3.50 Hrs X 125.00 | Public Records Request Collection |
| Feb 20/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Phonecall from VP2 re public records request. |
| Feb 20/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Meeting with VP, Trevor Bonillare public records request. |
| Feb 20/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Meeting with VP re public records request. |
| Feb 20/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.50 Hrs X 300.00 | Email from Captain Giannini, meeting with Trevor, review requests for public records |
| Feb 21/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Collect Host Agreements |
| Feb 21/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Phonecall to Lt. Jordan re public records request production and exclusion. |
| Feb 21/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Draft form letter to operating marijuana entities re compliance with public records request. |

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| | | | | Review and finalize public records response extension letter; review host agreements and draft record request letters for Garden Remedies, MPF, Rev Clinics. |
| Feb 21/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.80 Hrs X 300.00 | |
| Feb 22/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Revise letter to Worcester Telegram & Gazette |
| Feb 22/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Emails to Attorney Silverman, Attorney Smith and Bert Vining with correspondence from Attorney Pusateri |
| Feb 23/2019 | 1599a-02 | Marijuana | Lawyer: ct 3.00 Hrs X 300.00 | CMT/VP review document production for responsiveness and redaction. |
| Feb 23/2019 | 1599a-02 | Marijuana | Lawyer: vpp 2.00 Hrs X 300.00 | Public Records Request |
| Feb 23/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Garden Remedies: Email to Vincent Pusateri; searching for public records |
| Feb 25/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Organize excel time entries |
| Feb 25/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.50 Hrs X 300.00 | Public Records responses, Garden Remedies, Rev. Clinics, Apothica, finalize response |
| Feb 25/2019 | 1599a-02 | Marijuana | Lawyer: ct 3.70 Hrs X 300.00 | Public records request. |
| Feb 25/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Phonecall returned to AJ re public records request. |
| Feb 26/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.50 Hrs X 300.00 | Prepare for Opiod litigation and meeting |
| Feb 26/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Phone call with Attorney Bonsignore |
| Feb 27/2019 | 1599a-02 | Marijuana | Lawyer: ct 2.00 Hrs X 300.00 | Review email proposal production for public records request with VP2. |
| Feb 28/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Opiod litigation , review fact sheet history of attorney contact |
| Feb 28/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Review of emails for marijuana proposal discovery production. |
| Mar 1/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Contact from Attorney Bonsignore |
| Mar 1/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Review emails re: public records request |
| Mar 1/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.60 Hrs X 300.00 | Review and categorize proposal emails for public records request production. |
| Mar 2/2019 | 1599a-02 | Marijuana | Lawyer: ct 2.30 Hrs X 300.00 | Complete sorting and labelling of City proposal emails for public records request. |
| Mar 2/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.40 Hrs X 300.00 | Drafting of HCA amendments and amendment letters for Garden Remedies and both Green Era agreements. |
| Mar 4/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Opiod Correspondence |
| Mar 4/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Marijuana Garden Remedies Revision of Agreement |
| Mar 4/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Marijuana Green Era Revision of Agreement |
| Mar 5/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 125.00 | Review and revise letters to Garden Remedies, Green Era |
| Mar 7/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Revise letters to Jack Carney |
| Mar 7/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.70 Hrs X 300.00 | Sort/review IT's email production on HCA proposals for public records request; draft email to marijuana entites. |
| Mar 7/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Email re: Social Equity |
| Mar 8/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Forward proposals for review on public records response. |
| Mar 8/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email to Logan Morse at ACT Labs |
| Mar 8/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Phone call from Hank Naughton |
| Mar 9/2019 | 1599a-02 | Marijuana | Lawyer: ct 3.00 Hrs X 300.00 | Compiling of production and forwarding of proposals for review on public records response. |
| Mar 11/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Researched and emailed instructions on opening PST files to marijuana entities. |
| Mar 12/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.50 Hrs X 300.00 | Marijuana public records requests forwarded to private companies for review. |
| Mar 13/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 125.00 | Phone call from Jack Carney |
| Mar 13/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Order for Execution of Stalk & Beans HCA |

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| Mar 14/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Revise Stalk & Beans Order; submit Order and HCA to Anna for City Council |
| Mar 14/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from Ramon Rivera, email to Anne Cervantes |
| Mar 14/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Review Eastern Heirlooms HCA and Impact Fee Letter |
| Mar 14/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Email response to Atty. Silverman re Stalk & Beans. |
| Mar 15/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Review marijuana issues with AJ. |
| Mar 15/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.00 Hrs X 300.00 | Review technical issues with Trevor Bonilla; completion of public documents production onproposals; letter to Atty. Rossof NS AJO. |
| Mar 15/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Forward signed Stalk & Beans agreement to AJ; email response to Atty. Silverman oncertification. |
| Mar 15/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Contact with Phil Silverman re:Stalk & Beans |
| Mar 17/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Research re CCC updates, Meriden v. Salem decision on CCC review of HCA's. |
| Mar 18/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.33 Hrs X 125.00 | Letter to Worcester Telegram & Gazette |
| Mar 18/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from and to Matthew Know re: Stalk & Beans City Council |
| Mar 18/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from Attorney Silverman re: Public Records Request |
| Mar 19/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 125.00 | Revise letter to Brad Petrishen; email to Brad Petrishen |
| Mar 19/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Review letter to Brad Petrishenre: public records request; email from Brad |
| Mar 20/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.50 Hrs X 125.00 | Bring Stalk & BeansHCA to Mayorand VP2 for execution, bring toCity Hall with executed Host Certification Form , bring Order to Mayor for Execution; draft packets for Stalk & Beans/Atty Silverman; |
| Mar 20/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Emails to and from Phil Silverman and Matthew Knox; phone call from and to Attorney Silverman |
| Mar 20/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Phone call to Ben Nero re: HCA Eastern Heirlooms and email |
| Mar 20/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Revision of Stalk & Beans HCA for execution by Mayor. |
| Mar 21/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.40 Hrs X 300.00 | Review order, email forwarding Stalk & Beans executed HCA to Atty. Silverman. |
| Mar 22/2019 | 1599a-02 | Marijuana | Lawyer: dm 2.00 Hrs X 125.00 | Review HCA Public Records Request, correlate time |
| Mar 22/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Initial review of CCC report. |
| Mar 23/2019 | 1599a-02 | Marijuana | Lawyer: dm 2.00 Hrs X 125.00 | Review Public Records request; enter time |
| Mar 23/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Review Marijuana HCA Amendments |
| Mar 23/2019 | 1599a-02 | Marijuana | Lawyer: ct 1.30 Hrs X 300.00 | Review of time entries for public records production. |
| Mar 24/2019 | 1599a-02 | Marijuana | Lawyer: ct 2.00 Hrs X 300.00 | Review of CCC report on HCA's and municipal guidance; email to VP2 with notes on the same. |
| Mar 25/2019 | 1599a-02 | Marijuana | Lawyer: dm 2.50 Hrs X 125.00 | Correlate records for Public Records Request |
| Mar 25/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 125.00 | Correlate additional records for Public Records Request |
| Mar 25/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Revise and Correlate documents to Worcester Telegram & Gazette |
| Mar 25/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Marijuana public records request. |
| Mar 26/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Apothca: Phone call from Mayor's Office |
| Mar 26/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 125.00 | NS AJO: Phone call from Mayor'sOffice regarding review of letter |
| Mar 26/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.60 Hrs X 300.00 | Review and modify HCA for The Hub Culture, email, phonecall with Brian Arandez reviewing. |
| Mar 26/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.40 Hrs X 300.00 | Review and discussion of CCC report with VP. |
| Mar 27/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Draft ACT Laboratories Order |
| Mar 27/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.20 Hrs X 125.00 | Revise letter to NS AJO |

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| Mar 27/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.20 Hrs X 300.00 | Emails re finalization and scheduling of Fitchburg Newport HCA for City Council approval. |
| Mar 28/2019 | 1599a-02 | Marijuana | Billing on Invoice 19321 | FEES 31791.00 |
| Mar 28/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | ACT Laboratories: Submit Order and HCA to City Clerk's Office |
| Mar 28/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Fresh Connection LLC: Submit Order and HCA to City Clerk's Office |
| Mar 28/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from Will Seagaard |
| Mar 29/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 300.00 | Review HR Public Records request, emails to and from Susan Davis |
| Mar 30/2019 | 1599a-02 | Marijuana | Lawyer: ct 2.00 Hrs X 300.00 | Compilation of time entries for public records production. |
| Mar 30/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Draft public records response cover letter. |
| Apr 1/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Draft letter to Captain LeMay RE: consumption of marijuana in public |
| Apr 1/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Form 9/10 for ACT Laboratories and Fresh Connection Boston LLC, Will Seagaard in office |
| Apr 1/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.40 Hrs X 300.00 | Emails to/from Ben Nero, AJ on execution of Eastern Heirlooms and placing on City Council agenda. |
| Apr 2/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 0.00 | To City Hall to deposit Form 9/10 |
| Apr 2/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Email from Barbara Nealon |
| Apr 4/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 125.00 | Review ACT Order and HCA with Mayor's Office; discuss HCA updates and orders |
| Apr 8/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.22 Hrs X 125.00 | Email to Beth Walsh RE: Legislative Affairs Meeting |
| Apr 16/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.33 Hrs X 125.00 | Hub Craft: call from Brian Arandez, contact with Mayor's Office regarding the same |
| Apr 16/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.33 Hrs X 125.00 | Fresh Connection: call from Will Seagaard, contact with Mayor's Office regarding the same |
| Apr 17/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Email response to Brian Arandez of The Hub Craft on assignment of HCA to Legislative Affairs and timing of approval by City Council. |
| Apr 18/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.30 Hrs X 300.00 | Email response to Brian Arandez on questions with completion of HCA approval process in City Council for The Hub Craft, Inc. |
| Apr 23/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 125.00 | Phone call from Will Seagaard; emails to and from regarding the same |
| Apr 26/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Will Seagaard in office |
| Apr 26/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 125.00 | Call from Will Seagaard; Will Seagaard in office to sign original HCA |
| Apr 30/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.50 Hrs X 300.00 | Mtg with Will Seagaard to review Addendum & revise. |
| May 1/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Email from Amy Green |
| May 1/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.10 Hrs X 300.00 | Email from ACT Labs |
| May 2/2019 | 1599a-02 | Marijuana | Lawyer: ct 0.40 Hrs X 300.00 | Questions and response on The Hub Craft HCA status, email to Brian Arandez re status on passage. |
| May 3/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Phone call and emails to Councilor Beauchemin |
| May 8/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Phone call to Phil Silverman; email from Phil Silverman |
| May 13/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Fresh Connection Boston: Email to Will Seagaard |
| May 15/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 125.00 | To Mayor's Office; collect and correlate HCA's recently approved by City Council, to Clerk's Office for Orders; call from Will Seagaard; call to Ben Nero |
| May 15/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 125.00 | Call from Will Seagaard; to Mayor's Office for Host Certification Form execution; emails to Will Seagaard |
| May 15/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Call to Ben Nero and prepare HCA to be mailed and mail the same |
| May 15/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from Jim Smith RE Green Soul |
| May 15/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Email Green Soul |
| May 16/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from Attorney Silverman |

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| May 17/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 125.00 | Hub Craft: Email to Brian Arandez with executed HCA and Certification Form; phone call to Mayor's Office RE: HCA request |
| May 17/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.75 Hrs X 300.00 | Email to Brian Arandez, Phone call to Mayor's office RE: HCA Request |
| May 22/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Contact with Mayor's Office regarding outstanding HCA's and current HCA issues |
| May 23/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Green Era: Email from Mayor's Office and Jack Carney |
| May 24/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Revise Green SOul HCA; emails to Attorney Smith |
| May 28/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Green Era: Amend HCA's to reflect company information |
| May 29/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Hub Craft: Email from AJ regarding HCA |
| May 31/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Call to Jim Smith -Green Soul |
| Jun 1/2019 | 1599a-02 | Marijuana | Billing on Invoice 19725 | FEES 7007.50 |
| Jun 3/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Phone call from Jack Carney |
| Jun 5/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email to Phil Silverman regarding 226 Westminster LLC |
| Jun 11/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 125.00 | Green Era: Revise HCAs, email to Jack Carney |
| Jun 12/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email regarding 226 Westminster Street |
| Jun 17/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from Attorney Silverman regarding 226 Westminster Street |
| Jun 17/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | 226 Westminster; email from Attorney Silverman |
| Jun 18/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from Jim Smith |
| Jun 19/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 125.00 | Green Soul: Email and contact from Attorney Pusateri RE: HCA and Order for HCA |
| Jun 19/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email to Jim Smith regarding Green Soul |
| Jun 21/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.20 Hrs X 125.00 | Green Era: Email to Jack Carney |
| Jul 1/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Green Era: Email regarding HCAs |
| Jul 1/2019 | 1599a-02 | Marijuana | Billing on Invoice 19780 | FEES 373.75 |
| Jul 3/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Email to and from Attorney Smith |
| Jul 3/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.00 Hrs X 300.00 | Emails from & to Jim Smith |
| Jul 9/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Green Era: Email to Treasurer's Office regarding payment by Green Era |
| Jul 10/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Green Era: Email from and to Jack Carney |
| Jul 10/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.20 Hrs X 125.00 | Green Era: Contact with Mayor's Office regarding status of Agreement |
| Jul 10/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | To Mayor's Office for executed Community Host Benefit Agreements |
| Jul 10/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 125.00 | Green Era: Email to Jack Carney |
| Jul 10/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Green Era: Letter to Green Era enclosing HCA and Certification Forms |
| Jul 16/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Call from Mayor's Office regarding potential new real estate/marijuana development |
| Jul 25/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Garden Remedies: Email to Atty Hopper with form for execution |
| Jul 25/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Review Apothica & Garden Remedies |
| Jul 29/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Calls from AJ/Mayor's Office regarding 226 Westminster Street and request for HCA; email to Attorney Hedges |
| Jul 29/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Call regarding 226 Westminster |
| Aug 1/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Email to Attorney Hopper |
| Aug 1/2019 | 1599a-02 | Marijuana | Billing on Invoice 19952 | FEES 681.25 |
| Aug 5/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.20 Hrs X 125.00 | Email from Ian Hedges |
| Aug 5/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | NS-ASO: Email from Attorney Glissman |
| Aug 5/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | NS-Ajo Email from Attorney Glissman |
| Aug 9/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | HCA Signature pages from 226 Westminster Corp. |
| Aug 9/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | HCA Signature Pages from 226 Westminster Corp. |

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| Aug 21/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Emails to and from AJ RE: 310 Broad Street |
| Aug 29/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 300.00 | Review, revise and draft Order for HCA |
| Sep 1/2019 | 1599a-02 | Marijuana | Billing on Invoice 20080 | FEES 282.50 |
| Sep 3/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | 226 Westminster Street: Call from Ian Hedges, call to AJ, call to Ian Hedges |
| Sep 4/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Review Marijuana Companies with AJ RE: Status |
| Sep 9/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 125.00 | Emails from AJ |
| Sep 13/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 125.00 | To City Hall to retrieve HCAs, contact with AJ RE: the same |
| Sep 13/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | 226 Westminster Street: Prepare HCA for execution |
| Sep 13/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Emails from and to Attorney Hedges RE: 226 Westminster Corp. |
| Sep 17/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Review and revise Fitchburg Medical & Adult Use Marijuana Applications |
| Sep 17/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Emails from and to Attorney DeBenedictis |
| Sep 18/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 125.00 | Review Public Records Request with Mayor's Office |
| Sep 23/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 125.00 | Phone call to Building Department; emails to Building Department; update Marijuana Spreadsheet; phone calls with Mayor's Office; review of Mayor's MJ spreadsheet |
| Sep 23/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 125.00 | Meeting with VP2 and Community Development to review the status of marijuana companies, HCAs, special permits and building permits; revise spreadsheet |
| Sep 24/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.20 Hrs X 125.00 | The Healing Center: Phone call from Attorney DeBenedictis |
| Sep 26/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email from Danielle DeBenedictis |
| Sep 30/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 125.00 | Email to Atty DeBenedictis |
| Oct 1/2019 | 1599a-02 | Marijuana | Billing on Invoice 20371 | FEES 797.50 |
| Oct 3/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.20 Hrs X 125.00 | Call from Mayor's Office regarding status of HCAs |
| Oct 3/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 125.00 | Cannaburg, LLC: Revise HCA; email to Sean Morrison; email to Mayor's Office |
| Oct 7/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Email Cannaburg |
| Oct 8/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Phone call with AJ |
| Oct 10/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Phone call to Atty DeBenedictis |
| Oct 10/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 125.00 | The Healing Center: Council Order, prepare and submit to Anna Farrell |
| Oct 10/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 125.00 | Cannaburg, LLC: Council Order, prepare and submit to Anna Farrell |
| Oct 11/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Phone call with Jim Smith |
| Oct 11/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 300.00 | Emails re: Appointing Authority |
| Oct 11/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 300.00 | Review Wachusett Mountain Agreement |
| Oct 15/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Care Patient Connection: Phone call from AJ RE: HCA; email to VP2 |
| Oct 15/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 125.00 | Draft Spreadsheet with Building Locations and Permit Status |
| Oct 15/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 125.00 | Email to Mayor's Office |
| Oct 15/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 0.00 | Review Marijuana Companies / Building Permit |
| Oct 17/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.20 Hrs X 125.00 | Caregiver Patient Connection: Phone call from AJ Tourigny |
| Oct 17/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.20 Hrs X 125.00 | Fitchburg Arts Community document collection |
| Oct 22/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 125.00 | Call from Mayor's Office regarding MJ spreadsheet; email to A.J. |
| Oct 22/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 125.00 | Local Roots: Compare and combine new HCA form with old executed HCA |
| Oct 22/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 0.00 | The Healing Center: Email to Atty DeBenedictis |
| Oct 24/2019 | 1599a-02 | Marijuana | Billing on Invoice 20428 | FEES -40933.50 |
| Oct 24/2019 | 1599a-02 | Marijuana | Fees To Lawyer vpp | Zero out/non billable work. |

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| Oct 24/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Email re: marijuana Panda Solutions HCA Form |
| Oct 25/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 0.00 | Caregiver-Patient Connection: Review, revise and send HCA to Catherine Trifilo with Amendments; call from Mayor's Office regarding the same |
| Oct 25/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 0.00 | Review and revise Marijuana spreadsheet and email to Tom Skwierawski |
| Oct 31/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Email from Brian Jorrigan re: 291 Westminster Street |
| Nov 1/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 0.00 | Review Subpoena from ADA Grady |
| Nov 2/2019 | 1599a-02 | Marijuana | Lawyer: vpp 7.00 Hrs X 0.00 | Review and compile document for grand jury subpoena |
| Nov 4/2019 | 1599a-02 | Marijuana | Lawyer: dm 3.00 Hrs X 0.00 | Compile records/review records for grand jury subpoena; email to Attorney Angelini; memo to file |
| Nov 4/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 0.00 | The Healing Center: Email from Attorney DeBenedictis; email to AJ Tourigny |
| Nov 4/2019 | 1599a-02 | Marijuana | Lawyer: vpp 2.50 Hrs X 0.00 | Compile documents re: grand jury subpoena and Attorney Angelini |
| Nov 4/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Draft email to Catherine Trifilo |
| Nov 5/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 0.00 | Review grand jury subpoena; |
| Nov 5/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 0.00 | NS AJO: Review HCA Form; letter to Attorney Ross regarding Amendment |
| Nov 5/2019 | 1599a-02 | Marijuana | Lawyer: dm 3.00 Hrs X 0.00 | Draft, review and revise letters to Attorney Silverman RE: Mass Patient Foundation and NS AJO to Atty Ross |
| Nov 5/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.25 Hrs X 0.00 | Draft, review and revise Amendments |
| Nov 5/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Email from Jessica Barrett and to re: Subpoena |
| Nov 5/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 0.00 | Meeting with Attorney Pawlak re: grand jury subpoena document collection |
| Nov 5/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.50 Hrs X 0.00 | Atlantic Medicinal Partners: review and draft amended Host Community Agreement, draft letter to Attorney Silverman. NS AJO Holdings: revise amended Host Community Agreement and letter to Attorney Ross with Amended HCA |
| Nov 6/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 0.00 | Caregiver Patient Connection: Review payment, HCA; letters to City Hall |
| Nov 6/2019 | 1599a-02 | Marijuana | Lawyer: dm 2.50 Hrs X 0.00 | Collect Records for Grand Jury Subpoena |
| Nov 6/2019 | 1599a-02 | Marijuana | Lawyer: dm 2.00 Hrs X 0.00 | Review MJ accounting and letter to Phil Silverman |
| Nov 6/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 0.00 | Caregiver Patient Connection; Email from Catherine Trifilo with Amended Agreement and email to C. Trifilo |
| Nov 6/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 0.00 | AMP: Review and revise letter to Attorney Silverman |
| Nov 6/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Emails and phone call re: Boston Herald Request |
| Nov 6/2019 | 1599a-02 | Marijuana | Lawyer: vpp 2.00 Hrs X 0.00 | DOJ document response |
| Nov 6/2019 | 1599a-02 | Marijuana | Lawyer: vpp 2.00 Hrs X 0.00 | Correlate records for Subpoena request |
| Nov 6/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 0.00 | NSAJO: Draft Amended Agreement, Letter to Attorney Ross |
| Nov 7/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 0.00 | NS AJO Holdings LLC: Revise and draft letter to Atty Ross and revise HCA |
| Nov 7/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 0.00 | Revise AP Voucher |
| Nov 7/2019 | 1599a-02 | Marijuana | Lawyer: dm 3.00 Hrs X 0.00 | Grand Jury Subpoena preparation |
| Nov 7/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 0.00 | Cannabis Pipeline Meeting with AJ and Tom Skwierawski |
| Nov 7/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 0.00 | Email to Attorney Ross with Amended Agreement and email from Attorney Ross |
| Nov 7/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.00 Hrs X 0.00 | Correlate records for subpoena response |
| Nov 7/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.20 Hrs X 0.00 | City Council Meeting |
| Nov 8/2019 | 1599a-02 | Marijuana | Lawyer: dm 5.00 Hrs X 0.00 | Review/preparation of response to Grand Jury Subpoena; self-audit; phone call to various departments |
| Nov 8/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Caregiver Patient: Email from Catherine Trifilo |
| Nov 8/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Email from Adrian Ford re: Marijuana Caps |

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| Nov 11/2019 | 1599a-02 | Marijuana | Lawyer: dm 7.00 Hrs X 0.00 | Review Tier Status; phone call to Mayor's Office; research CCC website; |
| Nov 11/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | The Healing Center, LLC: phoen call and email to Attorney DeBenedictis |
| Nov 11/2019 | 1599a-02 | Marijuana | Lawyer: vpp 3.00 Hrs X 0.00 | Correlate records for DOJ response |
| Nov 12/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 0.00 | Phone call to Mayor's Office RE: Marijuana Tier Status/Level |
| Nov 12/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.19 Hrs X 0.00 | Email to Mike O'Hara RE: Special Permits |
| Nov 12/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.13 Hrs X 0.00 | Email to Liz Keese regarding City Council Orders |
| Nov 12/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 0.00 | Phone call from Mayor's Office RE: Marijuana Tier Status/Update |
| Nov 12/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.18 Hrs X 0.00 | Local Roots: Draft Form 9 10 for Submittal of Local Roots Deposit |
| Nov 12/2019 | 1599a-02 | Marijuana | Lawyer: dm 3.60 Hrs X 0.00 | Review and revise Marijuana HCAs and letters to companies/attys |
| Nov 12/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 0.00 | Correlate mailing for letters and amedended HCAs |
| Nov 12/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 0.00 | Revise letters to various MJ companies; email to various MJcompanies |
| Nov 12/2019 | 1599a-02 | Marijuana | Lawyer: vpp 5.00 Hrs X 0.00 | Email/letter to Blue Collar Botany, Garden Remedies, GreenEra, Eastern Heirlooms, Fresh Connection, Native Sun, Revolutionary Clinics, Apothcaand Cypress Tree |
| Nov 12/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Eastern Heirlooms: Email from Ben Nero |
| Nov 13/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.20 Hrs X 0.00 | Phone call from Clerk's Office RE: MJ Orders |
| Nov 13/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.20 Hrs X 0.00 | Eastern Heirlooms: Email to BenNero |
| Nov 14/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Garden Remedies: Email from Mayors office and GR Taylor Schlacter |
| Nov 18/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Fresh Connection: Email from Will Seagaard |
| Nov 18/2019 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 0.00 | Correlate documetns for grand jury subpoena; emails and phone calls with auditors office |
| Nov 19/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.80 Hrs X 0.00 | Review and revise Marijuana Tier/Status Update Spreadsheet |
| Nov 20/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 0.00 | Review document response with Mayor's Office |
| Nov 20/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Rev clinics and garden remedies, phone call with SiraGrant |
| Nov 20/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Cannaburg: Email from Sean Morrison |
| Nov 25/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 0.00 | Revise Marijuana Spreadsheet |
| Nov 25/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 0.00 | Meeting with A.J. RE: Update of Marijuana Spreadsheet |
| Nov 25/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.70 Hrs X 0.00 | Draft Petition and Zoning Ordinances for Moratorium |
| Nov 25/2019 | 1599a-02 | Marijuana | Lawyer: vpp 2.00 Hrs X 0.00 | Draft Moratorium Petition and proposed Ordinances |
| Dec 1/2019 | 1599a-02 | Marijuana | Billing on Invoice 20726 | |
| Dec 2/2019 | 1599a-02 | Marijuana | Lawyer: dm 2.00 Hrs X 0.00 | Review and revise Marijuana Spreadsheet; research Special Permits; research recordings in Registry of Deeds; draft email to AJ & VP2 |
| Dec 2/2019 | 1599a-02 | Marijuana | Lawyer: dm 2.50 Hrs X 0.00 | Correlate emails and review emails for grand jury subpoena |
| Dec 2/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.00 Hrs X 0.00 | Email from Phil Silverman |
| Dec 3/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 0.00 | Revise Marijuana Spreadsheet; research Special Permit recording dates; modifications; City Council Orders |
| Dec 3/2019 | 1599a-02 | Marijuana | Lawyer: dm 2.50 Hrs X 0.00 | Correlate emails for grand jurysubpoena |
| Dec 3/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 0.00 | Email to Phil Dawson regarding emails/mac usage |
| Dec 3/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 0.00 | Phone call from Attorney Silverman re: Amp and Aphical |
| Dec 3/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 0.00 | Correspondence re: Aphical Old World Remedies |
| Dec 3/2019 | 1599a-02 | Marijuana | Lawyer: vpp 3.00 Hrs X 0.00 | WGBH Response and Blue Collar and Apical and Old World |

City of Fitchburg
Law Department
Matter #: 1599a-02

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|-------------|----------|-----------|-----------------------------|---|
| Dec 3/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Email re: Apical |
| Dec 3/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Email re: AMP |
| Dec 4/2019 | 1599a-02 | Marijuana | Lawyer: vpp 2.00 Hrs X 0.00 | Correlate Public Records Request Response |
| Dec 4/2019 | 1599a-02 | Marijuana | Lawyer: dm 2.00 Hrs X 0.00 | Correlate records for public records response; draft response to WGBH |
| Dec 4/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Email from Hal Melanson |
| Dec 4/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 0.00 | Email to Trevor regarding emails |
| Dec 5/2019 | 1599a-02 | Marijuana | Lawyer: vpp 2.00 Hrs X 0.00 | Draft email to Amanda Beland; recover unsaved email; attach and separate PDF's to send with email |
| Dec 5/2019 | 1599a-02 | Marijuana | Lawyer: vpp 2.00 Hrs X 0.00 | Public Records Response |
| Dec 6/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 0.00 | Correlate and organize emails for public records response |
| Dec 9/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 0.00 | Email from Mayor's Office regarding MJ Queue |
| Dec 9/2019 | 1599a-02 | Marijuana | Lawyer: vpp 5.00 Hrs X 0.00 | Correlate documents for DOJ Grand Jury Subpoena Request |
| Dec 10/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 0.00 | Review WGBH draft email |
| Dec 10/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 0.00 | Correlate DOJ Records Response |
| Dec 10/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 0.00 | Donna Pawlak's Office in for retrieval of MJ DOJ IT Response |
| Dec 11/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.90 Hrs X 0.00 | Correlate emails from date of I.T. Department's extraction; |
| Dec 11/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Call from Planning Dept. re: Marijuana |
| Dec 11/2019 | 1599a-02 | Marijuana | Lawyer: vpp 3.00 Hrs X 0.00 | Compile final Law Dept. Production |
| Dec 18/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Email from Phil Silverman |
| Dec 18/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.22 Hrs X 0.00 | Call from Mayor's Office; email to Mayor's Office |
| Dec 18/2019 | 1599a-02 | Marijuana | Lawyer: vpp 2.00 Hrs X 0.00 | Marijuana Meetign with Senator Tran and Senator Rosenberg, meeting re: HR |
| Dec 19/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 0.00 | Collect emails; bring to Attorney Pawlak's office |
| Dec 19/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.30 Hrs X 0.00 | Review MJ Subpoena |
| Dec 19/2019 | 1599a-02 | Marijuana | Lawyer: dm 1.50 Hrs X 0.00 | Review MJ Subpoena and correlate records for AttorneyPawlak; to Attorney Pawlak's office; emails; |
| Dec 20/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 0.00 | Correlate text messages in excel |
| Dec 20/2019 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 0.00 | Phone call from Attorney Silverman re: Prosective Marijuana Company |
| Dec 27/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.70 Hrs X 0.00 | Review DOJ Response |
| Dec 27/2019 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 0.00 | Review produced emails |
| Dec 28/2019 | 1599a-02 | Marijuana | Lawyer: dm 7.40 Hrs X 0.00 | DOJ Subpoena Request |
| Jan 2/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 0.00 | Meeting with VP2 regarding DOJ Resposne |
| Jan 2/2020 | 1599a-02 | Marijuana | Lawyer: dm 1.70 Hrs X 0.00 | Review DOJ Response |
| Jan 2/2020 | 1599a-02 | Marijuana | Lawyer: dm 1.30 Hrs X 0.00 | Review DOJ Response |
| Jan 2/2020 | 1599a-02 | Marijuana | Lawyer: dm 2.95 Hrs X 0.00 | Review DOJ Repsonse; correlate emails |
| Jan 3/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.20 Hrs X 0.00 | Emails from and to Phil Dawson/Barracuda License |
| Jan 3/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 0.00 | Review DOJ Response |
| Jan 6/2020 | 1599a-02 | Marijuana | Lawyer: dm 12.50 Hrs X 0.00 | |
| Jan 7/2020 | 1599a-02 | Marijuana | Lawyer: dm 6.00 Hrs X 0.00 | DOJ Subpoena Document Production |
| Jan 8/2020 | 1599a-02 | Marijuana | Lawyer: dm 3.50 Hrs X 0.00 | Review DOJ Subpoena Response; review emails to be submitted |
| Jan 9/2020 | 1599a-02 | Marijuana | Lawyer: dm 2.00 Hrs X 0.00 | DOJ Document Production Review |
| Jan 10/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 0.00 | Email to Attorney Pawlak with spreadsheet |
| Jan 15/2020 | 1599a-02 | Marijuana | Lawyer: dm 1.00 Hrs X 0.00 | To City Hall; review outstanding issues with Mayor's Office and Planning Department |
| Jan 16/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Email to Atty Smith RE Garden Remedies |
| Jan 21/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 0.00 | Call to Mayor's Office |
| Jan 23/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.75 Hrs X 0.00 | Emails and phone call to Mannie Greenspan |
| Jan 27/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Call from Manny Greenspan |
| Jan 27/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 0.00 | Email from Mannie Greenspan |
| Jan 29/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Emails from and to Amanda Beland |

City of Fitchburg
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|-------------|----------|-----------|-----------------------------|---|
| Jan 31/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 0.00 | Review outstanding issues with AJ RE: 431 Westminster Street |
| Jan 31/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 0.00 | Marajuana Apical, call to Jim Smith, call from AJ and correspondence from Justin Gelinis |
| Feb 3/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.33 Hrs X 0.00 | Apical: Review emails from Attorney Parron |
| Feb 3/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Email from Amanda Beland |
| Feb 3/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Email from Lorenzo Moll re: 291Westminster Street and email toLorenzo Moll |
| Feb 4/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.80 Hrs X 0.00 | Public Records Request |
| Feb 4/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Phone call from Donna Pawlak |
| Feb 4/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Email re: Apical |
| Feb 12/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Email from and to Dan Glissman |
| Feb 12/2020 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 0.00 | Review outstanding Amendments |
| Feb 19/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.30 Hrs X 0.00 | Review and revise letter to Council President Kushmerek |
| Feb 21/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.35 Hrs X 0.00 | Email to President Kushmerek; letter to The Healing Center, LLC; |
| Feb 21/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.75 Hrs X 0.00 | Phone call regarding Marijuana applications |
| Feb 24/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 0.00 | Email to AMP, Garden Remedies, Cypress Tree, Rev Clinics and Natural Selections, phone callto Mayors office |
| Feb 26/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.30 Hrs X 0.00 | Garden Remedies: Amend HCA Language |
| Feb 26/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 0.00 | Phone call to Attorney Silverman |
| Feb 26/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 0.00 | Phone call to Attorneys Smiths Office |
| Feb 27/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Call to Blue Collar Botany |
| Feb 28/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.30 Hrs X 0.00 | Amend HCA for Blue Collar Botany |
| Mar 2/2020 | 1599a-02 | Marijuana | Billing on Invoice 21203 | |
| Mar 2/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 0.00 | Call with Phil Silverman, call with TOM Skwiewawski |
| Mar 3/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Email with MIke ROss |
| Mar 5/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Marijuana correspondence from Eastern Heirlooms |
| Mar 5/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | AMP Amended HCA |
| Mar 6/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.20 Hrs X 0.00 | Email from and to Ben Nero |
| Mar 9/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Email from Calvin Brooks re: Public Records Request |
| Mar 10/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Eastern Heirloom: Emails from Ben Nero; call to Dan Glissman |
| Mar 10/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Email from Attorney Silverman RE: Cypress Tree/Apical |
| Mar 13/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.75 Hrs X 0.00 | Phone call with Attorney Silverman and Attorney Smith |
| Mar 13/2020 | 1599a-02 | Marijuana | Lawyer: vpp 2.00 Hrs X 0.00 | Respond to public records request |
| Mar 16/2020 | 1599a-02 | Marijuana | Lawyer: vpp 1.00 Hrs X 0.00 | Public Records Respond to Clerk's Office |
| Mar 17/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Email Local Roots |
| Mar 19/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Local Roots |
| Mar 30/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.50 Hrs X 0.00 | Call to Attorney Silverman, emails, draft correspondence |
| Apr 1/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.95 Hrs X 0.00 | Call to AJ; draft and revise Asssignment letter to Cypress Tree; review with VP2 |
| Apr 1/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.35 Hrs X 0.00 | Review and revise letter to JimSMith; call from VP2 re: same |
| Apr 1/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.25 Hrs X 0.00 | Assignment Apical |
| Apr 8/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 0.00 | Phone call from AJ RE: Cypress Tree |
| Apr 9/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 0.00 | Email to Attorney Silverman |
| Apr 10/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.10 Hrs X 0.00 | Email from Phil Silverman |
| Apr 13/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 0.00 | Phone call from AJ RE: Amended HCA signatories and packets |
| Apr 13/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 0.00 | Phone call with AJ RE: Amended HCA's |

City of Fitchburg
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Matter #: 1599a-02

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|-------------|----------|-----------|-----------------------------|--|
| Apr 18/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 0.00 | Rev Clinics: Phone call from VP2 RE: Special Permit and HCA payments |
| Apr 18/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.75 Hrs X 0.00 | Draft letter to Attorney Smith; review current proposed marijuana/COVID-19 legislation |
| Apr 20/2020 | 1599a-02 | Marijuana | Lawyer: dm 1.50 Hrs X 0.00 | Draft letter to Attorney Smith; Draft letter to Dr. Munkacy; email to AJ of the same |
| Apr 21/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 0.00 | Email to AJ RE: Special Permits and HCA Payments |
| May 1/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.50 Hrs X 0.00 | NS AJO: Email and phone call from AJ RE: sign permitting |
| May 4/2020 | 1599a-02 | Marijuana | Lawyer: dm 1.75 Hrs X 0.00 | Forward all amended and executed HCA's via email to MJ company; email to AJ |
| Jun 1/2020 | 1599a-02 | Marijuana | Billing on Invoice 21794 | |
| Jun 4/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Email from Hal Melanson |
| Jun 19/2020 | 1599a-02 | Marijuana | Lawyer: vpp 0.10 Hrs X 0.00 | Email from Attorney Smith |
| Jul 28/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 0.00 | Email to Chris Pacquette with HCA |
| Aug 1/2020 | 1599a-02 | Marijuana | Billing on Invoice 22101 | |
| Sep 2/2020 | 1599a-02 | Marijuana | Lawyer: dm 1.25 Hrs X 0.00 | Draft letter to Attorney Christensen |
| Sep 9/2020 | 1599a-02 | Marijuana | Lawyer: dm 0.25 Hrs X 0.00 | Email to Attorney Christensen |

Joseph Lekach

From: Joseph Lekach
Sent: Thursday, October 1, 2020 10:51 AM
To: 'Devon Moran'
Cc: philsilverman@vicentesederberg.com
Subject: RE: Apothca License Renewal Records Request

Hi Devon

Thank you for sending this over.

To be clear about the records request, it is requested by the Cannabis Control Commission as part of our renewal process. If there is a way to get the records in excel format so I can single out Apothca specific charges, it would likely please the CCC and may help to avoid any additional requests from them from the City.

In regards to our communications with the City, please advise as to what you are looking for. We communicate with various departments in the normal course of business and for which we pay separate permit fees for. Would you like all of that or only extra communications outside the course of regular business?

Best,
Joseph Lekach



Joseph Lekach
Chief Executive Officer
M. 305.741.6540
www.Apothca.com

From: Devon Moran <dmoran@pusaterilaw.com>
Sent: Thursday, September 24, 2020 12:57 PM
To: Joseph Lekach <joseph@artcangroup.com>
Subject: Apothca License Renewal Records Request

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Mr. Lekach,

Attached please find correspondence from Attorney Pusateri regarding the above-referenced request.

Should you have any questions, please do not hesitate to let us know.

Thank you.

Very truly yours,
Devon A. Moran

Pusateri & Wilson, P.C.
128 Prichard Street
Fitchburg, MA 01420
Telephone: (978) 342-6081
Fax: (978) 343-0600

Confidentiality: The information contained in this electronic message is confidential information intended only for the use of the individual or entity named above. If the reader of this message is not intended recipient, you are hereby notified that any reading, dissemination, distribution, copying or other use of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone (978) 342-6081 and return the original message to us at the above address via the U.S. Postal Service.

IRS Circular 230 Disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

APOTHCA, INC

PLAN FOR POSITIVE IMPACT

Overview

Apothca, Inc. ("Apothca") is dedicated to serving and supporting the areas around it, particularly those that are classified as areas of disproportionate impact. Marijuana businesses have an obligation to the health and well-being of their customers as well as the communities that have had historically high rates of arrest, conviction, and incarceration related to marijuana crimes. It is Apothca's intention to be a contributing, positive force in areas of disproportionate impact and to assist in changing the perception of those associated with marijuana use.

Apothca's Team

Apothca's team is currently made up of 12 individuals including 3 individuals from Black, African American, Hispanic, or Latino descent. Those individuals include Apothca's Chief Executive Officer, Joseph Lekach, who is of Latino descent, Apothca's Chairman of the Board of Directors, Rachmil Lekach, who is of Latino descent, and Apothca's Chief Financial Officer and Director, Andrew Mark Young, who is of Black descent.

As Apothca expands, Apothca's goal will be to provide a preference, in compliance with labor laws, to applicants that currently reside in an area of disproportionate impact or have lived for five of the preceding ten years in an area of disproportionate impact and applicants that have a drug-related CORI but are otherwise legally employable in a cannabis-related enterprise. In alignment with Apothca's Diversity Plan, Apothca will focus hiring and education efforts on diverse populations including individuals from Black, African American, Hispanic or Latino descent.

Continuing Efforts

To provide continuing service and reinvestment into areas of disproportionate impact, Apothca is committed programming, restorative justice, jail diversion, workforce development, industry-specific technical assistance, and mentoring services in areas of disproportionate impact. Apothca is committed to hosting and participating in events that will support the City of Fitchburg and other areas of disproportionate impact such as community service days, charity events, and educational seminars. Apothca will require all executives, managers, and employees to participate quarterly in a community service day. Each community service day will be organized with a charitable or local organization in an area of disproportionate impact. Further plans to positively affect areas of disproportionate impact may include the following:

- Conducting industry specific educational seminars in one or more of the following: marijuana cultivation, marijuana product manufacturing, marijuana retailing, or marijuana business training;
- Providing financial mentoring services or hosting organizations providing these services (FinLab <http://finlab.cfsinnovation.com/>, Citi Foundation <http://www.citigroup.com/citi/foundation/>, etc.);
- Monthly informational sessions regarding the process for sealing and expunging criminal records;
- Partnership and support for organizations providing jail diversion and restorative justice programs;

- Transportation support for employees in these areas;
- Hiring practices prioritizing individuals from these areas;
- Any necessary accommodations that will be provided for individuals coming from areas of disproportionate impact.

Plan Administration

The Chief Operating Officer will administer the Plan to Positively Impact Areas of Disproportionate Impact (the “Plan”). The Chief Operating Officer will be responsible for developing measurable outcomes and ensure Apothca continues to meet its commitment to the community. Apothca will undergo quarterly staffing audits to ensure that it is hiring individuals from areas of disproportionate impact (particularly Fitchburg).

Apothca will require employees to sign in for each of its quarterly community service days, which will be developed and coordinated by the Executive Management Team of Apothca. Furthermore, the Chief Operating Officer, in connection with Apothca staff, will plan and coordinate Apothca's seminars and monthly informational sessions.

The Chief Executive Officer will be responsible for coordinating any and all partnerships that Apothca establishes in connection with the Plan. The Chief Financial Officer will ensure that sufficient funds are budgeted to support the Plan, including for any and all events and also any transportation support for employees.



mass.gov/dor

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



MASSACHUSETTS PATIENT FOUNDATION
36 GLEN AVE
NEWTON MA 02459-2066

Why did I receive this notice?

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

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

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

What if I have questions?

If you have questions, call us at (617) 887-6367 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

Visit us online!

Visit mass.gov/dor to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

- Review or update your account
- Contact us using e-message
- Sign up for e-billing to save paper
- Make payments or set up autopay

Edward W. Coyle, Jr., Chief
Collections Bureau



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$35.00

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

Special Filing Instructions
n/a

Articles of Organization

(General Laws, Chapter 180)

Identification Number: 001177859

ARTICLE I

The exact name of the corporation is:

MASSACHUSETTS PATIENT FOUNDATION, INC.

ARTICLE II

The purpose of the corporation is to engage in the following business activities:

TO ENGAGE IN CIVIC, EDUCATIONAL, AND BENEVOLENT ACTIVITIES PER MGL CH. 180 §4.

ARTICLE III

A corporation may have one or more classes of members. If it does, the designation of such classes, the manner of election or appointments, the duration of membership and the qualifications and rights, including voting rights, of the members of each class, may be set forth in the by-laws of the corporation or may be set forth below:

MAY BE SET FORTH IN BY-LAWS.

ARTICLE IV

Other lawful provisions, if any, for the conduct and regulation of the business and affairs of the corporation, for its voluntary dissolution, or for limiting, defining, or regulating the powers of the corporation, or of its directors or members, or of any class of members, are as follows:

(If there are no provisions state "NONE")

1. MEETINGS OF DIRECTORS AND OFFICERS ARE AUTHORIZED TO TAKE PLACE ANYWHERE WITHIN THE UNITED STATES. 2. THE DIRECTORS MAY MAKE, AMEND, OR REPEAL THE BY LAWS IN WHOLE OR IN PART, EXCEPT WITH RESPECT TO ANY PROVISION THEREOF WHICH BY LAW, THE ARTICLES OF ORGANIZATION, OR THE BY-LAWS REQUIRE ACTION BY THE DIRECTORS. 3. NO DIRECTOR SHALL BE PERSONALLY LIABLE TO THE CORPORATION FOR MONETARY DAMAGES FOR BREACH OF FIDUCIARY DUTY AS DIRECTOR NOTWITHSTANDING ANY PROVISION OF LAW IMPOSING SUCH LIABILITY, PROVIDED HOWEVER THAT THIS PROVISION SHALL NOT ELIMINATE THE LIABILITY OF A DIRECTOR, TO THE EXTENT THAT SUCH LIABILITY IS IMPOSED BY APPLICABLE LAW; A. FOR ANY BREACH OF THE DIRECTOR'S DUTY OF LOYALTY TO THE CORPORATION. B. FOR ACTS OR OMISSIONS NOT IN GOOD FAITH OR WHICH INVOLVE INTENTIONAL MISCONDUCT OR KNOWING VIOLATION OF LAW; AND C. FOR ANY TRANSACTION FROM WHICH THE DIRECTOR DERIVED AN IMPROPER PERSONAL BENEFIT.

ARTICLE V

The by-laws of the corporation have been duly adopted and the initial directors, president, treasurer and clerk or other presiding, financial or recording officers, whose names are set out on the following page, have been duly elected.

ARTICLE VI

The effective date of organization of the corporation shall be the date approved and filed by the Secretary of the Commonwealth. If a *later* effective date is desired, specify such date which shall not be more than *thirty days* after the date of filing.

6/17/2015

ARTICLE VII

The information contained in Article VII is not a permanent part of the Articles of Organization.

a. The street address (*post office boxes are not acceptable*) of the principal office of the corporation in *Massachusetts* is:

No. and Street: 36 GLEN AVENUE
City or Town: NEWTON State: MA Zip: 02459 Country: USA

b. The name, residential street address and post office address of each director and officer of the corporation is as follows:

| Title | Individual Name First, Middle, Last, Suffix | Address (no PO Box) Address, City or Town, State, Zip Code | Expiration of Term |
|-----------|--|--|-----------------------|
| PRESIDENT | RACHMIL LEKACH | 296 OCEAN BLVD GOLDEN BEACH, FL 33160 USA 296 OCEAN BLVD GOLDEN BEACH, FL 33160 USA | 2016 |
| TREASURER | ANDREW MARK YOUNG | 9651 NW 42ND STREET CORAL SPRINGS, FL 33065 USA 9651 NW 42ND STREET CORAL SPRINGS, FL 33065 USA | 2016 |
| CLERK | PATRICIA PIKE | 5304 LAKESIDE AVENUE VIRGINIA BEACH, VA 23451 USA 5304 LAKESIDE AVENUE VIRGINIA BEACH, VA 23451 USA | 2016 |
| DIRECTOR | THOMAS S FARRELL | 23 VIOLA CIRCLE SEABROOK, NH 03874 USA 23 VIOLA CIRCLE SEABROOK, NH 03874 USA | 2016 |
| DIRECTOR | RACHMIL LEKACH | 296 OCEAN BLVD GOLDEN BEACH, FL 33160 USA 296 OCEAN BLVD GOLDEN BEACH, FL 33160 USA | 2016 |
| DIRECTOR | PATRICIA PIKE | 5304 LAKESIDE AVENUE VIRGINIA BEACH, VA 23451 USA 5304 LAKESIDE AVENUE VIRGINIA BEACH, VA 23451 USA | 2016 |
| DIRECTOR | MOSHE Y BLEICH | 793 WORCESTER STREET WELLESLEY, MA 02481 USA 793 WORCESTER STREET WELLESLEY, MA 02481 USA | 2016 |
| DIRECTOR | ANDREW MARK YOUNG | 9651 NW 42ND STREET CORAL SPRINGS, FL 33065 USA 9651 NW 42ND STREET CORAL SPRINGS, FL 33065 USA | 2016 |

c. The fiscal year (i.e., tax year) of the business entity shall end on the last day of the month of:
December

d. The name and business address of the resident agent, if any, of the business entity is:

Name: JOSHUA M. FOX, ESQ.
No. and Street: 36 GLEN AVENUE
City or Town: NEWTON State: MA Zip: 02459 Country: USA

I/We, the below signed incorporator(s), do hereby certify under the pains and penalties of perjury that I/we have not been convicted of any crimes relating to alcohol or gaming within the past ten years. I/We do hereby further certify that to the best of my/our knowledge the above-named officers have not been similarly convicted. If so convicted, explain:

IN WITNESS WHEREOF AND UNDER THE PAINS AND PENALTIES OF PERJURY, I/we, whose signature(s) appear below as incorporator(s) and whose name(s) and business or residential address (es) beneath each signature do hereby associate with the intention of forming this business entity under the provisions of General Law, Chapter 180 and do hereby sign these Articles of Organization as incorporator(s) this 17 Day of June, 2015. (If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)

RACHMIL LEKACH, PRESIDENT

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:

June 17, 2015 10:05 AM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

THIRD AMENDED BY-LAWS
OF
MASSACHUSETTS PATIENT FOUNDATION, INC.
December 21, 2017

THIRD AMENDED BY-LAWS
OF
MASSACHUSETTS PATIENT FOUNDATION, INC.

PURSUANT TO ARTICLE XII OF THE ORIGINAL BY-LAWS, VARIOUS AMENDMENTS TO THESE BY-LAWS HAVE BEEN MADE;

ARTICLE 1

General Provisions

Section 1.1 Name. The name of this non-profit corporation is MASSACHUSETTS PATIENT FOUNDATION, INC., and shall herein be referred to as the "NON-PROFIT."

Section 1.2 Offices. The principal business office of the NON-PROFIT shall be at 36 GLEN AVENUE, NEWTON, MASSACHUSETTS, 02459. The NON-PROFIT may also have offices at such other places as the NON-PROFIT may require.

Section 1.3 Fiscal Year. The fiscal year of the NON-PROFIT shall begin on January 1 and end on the following December 31 of each year.

Section 1.4 Voting Members. The NON-PROFIT shall have ONE (1) voting member. No person now or hereafter designated by the Non-Profit as a "member" for fundraising or other purposes shall be or be deemed to be a member for purposes of the Articles of Organization or By-Laws of the Non-Profit nor shall such person have any voting or fiduciary rights or responsibilities of the Non-Profit.

ARTICLE 2

Statement of Purposes

The NON-PROFIT is organized for non-profit purposes including, but not limited to, providing patients with knowledgeable, dedicated, compassionate herbal medicine expertise, and high quality, affordable medicine. As permitted by law, the NON-PROFIT may engage in any and all activities in furtherance of, related to, or incidental to these purposes, the activities being lawful for a non-profit formed under Chapter 180 of the General Laws of Massachusetts. In compliance with 105 CMR 725.100(A)(1), the DPH "*Guidance for Registered Marijuana Dispensaries Regarding Non-Profit Compliance*," and the Provisional Certificate of Registration, the NON-PROFIT shall at all times operate on a non-profit basis for the benefit of registered qualifying patients and shall ensure that revenue of the NON-PROFIT is used solely in furtherance of its nonprofit purpose.

ARTICLE 3

Members

Section 3.1 Identity of Original Member. The original member of the Non-Profit shall be Artcan, LLC, with a principal place of business at 2001 Tyler St, STE 5, Hollywood, FL 33020 (hereinafter referred to herein as the "Original Member"). In the event the Original Member resigns, withdraws, becomes disqualified or is otherwise incapable of acting, then the Chairman of the Board of Directors shall be vested with exclusive authority to appoint a substitute Member, subject to such terms and conditions, including terms and conditions with respect to voting rights, as individual may determine to be appropriate at the time of such appointment.

Section 3.2 Additional and Substitute Members. The Original Member may increase the number of members of the Non-Profit and may appoint additional members and substitute members on such terms and conditions, including terms and conditions related to voting rights, as the Original Member may from time to time determine (“Additional Members”). Rights conferred upon an Additional Member by the Original Member, including voting rights, need not be uniform for all Additional Members. As used in these Bylaws, the term “Member” shall refer only to the Original Member (including substitute Members described in Section 3.1), unless and until the Original Member acts to designate one or more Additional Members as specified in these Bylaws, at which time the term “Members” shall refer to the Original Member and the Additional Members collectively.

Section 3.3 Tenure. Unless a different term is designated at the time an Additional Member is admitted by the Original Member, for so long as a Member continues to comply with the qualifications, rules and regulations applicable to Membership as shall be established from time to time by the Member(s), each such Member shall continue to be a Member in good standing until such Member dies, resigns, withdraws, dissolves, becomes incapacitated or disqualified.

Section 3.4 Resignation. Any Member may resign by delivering a written resignation to the President or Clerk of the Non-Profit, to the Board of Directors, or to the principal office of the Non-Profit. Such resignation shall be effective upon receipt (unless specified to be effective at another time), and acceptance thereof shall not be necessary to make it effective; *provided, however,* that the non-resigning Members may act to accept such resignation immediately or at any other time sooner than the time specified by such resigning Member in his, her, or its resignation.

Section 3.5 Annual Meeting. The annual meeting of the Member(s) shall be held on such day and at such hour as may be named in the notice of such meeting designated by the Member(s). In the event that the annual meeting is not held on such date, a special meeting in lieu thereof may be held with all of the force and effect of an annual meeting.

Section 3.6 Special Meetings. Special meetings of the Member(s) may be called by the Member(s), the President or by a majority of the Directors, and shall be noticed by the Clerk, or in the case of the death, absence, incapacity or refusal of the Clerk, by any other officer.

Section 3.7 Notice. A written notice of the date, place, and hour of all meetings stating the purposes of the meeting shall be given by the Clerk (or by any other officer) at least seven (7) calendar days before the meeting to the Member(s). The Member(s) may waive notice either before or after a meeting.

Section 3.8 Action by Written Consent. Any action required or permitted to be taken at any meeting of the Member(s) may be taken without a meeting and without notice if the Member(s) unanimously consent to the action in writing and the written consent is filed with the records of the meetings of the Member(s). Such consent shall be treated for all purposes as a vote at a meeting.

Section 3.9. Quorum; Action at Meetings; Proxy Voting Not Permitted. Except as otherwise provided by law, the Articles of Organization or these Bylaws, at all meetings of the Member(s), a majority of the total number of Members then in office shall constitute a quorum

for the transaction of business, and the vote of a majority of the Members present and voting at a meeting when a quorum is present shall be the act of the Members. A majority of the Members present, whether or not a quorum is present, may adjourn any meeting to another time, date and place. Each Member shall be entitled to one (1) vote on any matter that comes before the Member(s). There shall be no voting by proxy.

Section 3.10. Presence through Communications Equipment. Unless otherwise provided by law or the Articles of Organization, the Member(s) may participate in a meeting by means of a conference telephone or similar communications equipment so that all persons participating in the meeting can hear each other at the same time and participation by such means shall constitute presence in person at the meeting.

Section 3.11. Powers of the Member(s). In addition to and without limiting the powers, rights and privileges the Member(s) shall have that are afforded to “members” of a Corporation organized under Chapter 180, the Articles of Organization, these Bylaws and other applicable law, the actions and powers of the Non-Profit listed below shall be reserved exclusively to the Member(s):

- (a) Amend or amend and restate the Articles of Organization;
- (b) Adopt, amend or repeal these Bylaws or any Policies related thereto;
- (c) Appointment, removal or suspension of any Director of the Non-Profit;
- (d) Change in the number of members of the Board of Directors of the Non-Profit;
- (e) Approval of any sale or other disposition of all, or substantially all, of the assets or operations of the Non-Profit;
- (f) Approval of any merger or consolidation of the Non-Profit;
- (g) Approval of any plan of dissolution of the Non-Profit, or other action related to dissolution or liquidation of the Non-Profit;
- (h) Appointment, suspension or removal of a Member of the Non-Profit; and
- (i) Authorize the Non-Profit to enter into any agreement to do any of the foregoing.

ARTICLE 4

Board of Directors

Section 4.1 Authority. The business and affairs of the NON-PROFIT shall be controlled and governed by the board of directors, which shall have the right to exercise all powers and duties of a board of directors under Massachusetts law, subject to Sections 3.11 and 4.14.

Section 4.2 Composition. The board of directors shall be comprised of five (5) directors. The composition of the board shall only be changed by amending the by-laws pursuant to Article 13.

Section 4.3 Terms of Office. The board of directors shall determine the length and number of terms to be served by directors.

Section 4.4 Meetings. The board of directors shall hold annual meetings each year and may select the time and place for annual and other meetings of the board. The board of directors must meet a minimum of once every six (6) months at the principal place of business. Other meetings of the board of directors may be called by the Member(s), the president or by a majority of the directors then in office by delivering notice in writing, of the date, time, place, and purpose of such meeting, to all directors at least three (3) days in advance of such meeting.

Section 4.5 Quorum and Voting. A majority of the board of directors shall constitute a quorum for the transaction of business at any meeting of the board. At any meeting of the board of directors at which a quorum is present, a majority of those directors present shall decide any matter, unless a different vote is specified by law, the Articles of Organization, or these bylaws. In the case of a tie, a vote shall be referred to an Advisory Board, if any, to decide the tie by a majority vote of the Advisory Board. If no Advisory Board exists at the time of the vote or within seven days of the tie vote, then a tie vote shall result in the motion or action being defeated.

Section 4.6 Meetings by Remote Communication. One or more directors may attend any annual, regular, special, or committee meeting of the board through telephonic, electronic, or other means of communication by which all directors have the ability to fully and equally participate in all discussions and voting on a substantially simultaneous basis. Such participation shall constitute presence in person at such meeting.

Section 4.7 Action Without a Meeting. Any action required or permitted to be taken at any board meeting may be taken without a meeting if a consent in writing, setting forth the action to be taken, shall be signed by all of the directors with respect to such subject matter. Such consent, which may be signed in counterparts, shall have the same force and effect as a vote of the board of directors.

Section 4.8 Waiver of Notice for Meetings. Whenever any notice of a meeting is required to be given to any director under the Articles of Organization, these bylaws, or the laws of the Commonwealth of Massachusetts, a waiver of notice in writing signed by the director, whether before or after the time of the meeting, shall be equivalent to the giving of such notice.

Section 4.9 Committees. By majority vote the board of directors may create such standing and special committees as it determines to be in the best interest of the NON-PROFIT. The board of directors shall determine the duties, powers, and composition of such committees, except that the board shall not delegate to such committees those powers which by law may not be delegated. Each such committee shall submit to the board of directors at such meetings as the board may designate, a report of the actions and recommendations of such committees for consideration and approval by the board of directors. Any committee may be terminated at any time by the board of directors.

Section 4.10 Compensation. Directors may receive a reasonable stipend as approved by the board from time to time, and directors shall not be precluded from serving the NON-PROFIT in any other capacity and receiving reasonable compensation.

Section 4.11 Resignation. Any director may resign by delivering a written resignation to the NON-PROFIT at its principal office or to the president or clerk. Such resignation shall be effective upon receipt unless it is specified to be effective at some later time. The resigning director may nominate his successor provided that three of the four remaining directors approve the nomination. a is present. In the event the nomination is not approved, the vacancy shall be filled pursuant to Section 4.13.

Section 4.12 Removal. Any director may be removed, with or without cause, by the Member, or in the event that Additional Members are added, by a vote of a majority of the Members at any meeting of the Members.

Section 4.13 Vacancies. Any vacancy occurring in the board of directors shall be filled by the Member(s). A director elected to fill a vacancy shall be elected for the unexpired term of his or her predecessor in office.

Section 4.14 Powers. The board of directors shall manage, control and be responsible for oversight of the affairs and property of the NON-PROFIT, and at all times may exercise on behalf of the NON-PROFIT all lawful powers, rights and privileges of the NON-PROFIT under Chapter 180 and any other applicable law, except those powers reserved to the Member(s) by law, the Articles of Organization or these Bylaws. The board of directors may delegate its powers, or a portion thereof, to committees that either consist solely of directors or give voting power only to directors on any such committee, except that the board of directors may not delegate the powers specified in Section 55 of Chapter 156B of the Massachusetts General Laws or other actions under Massachusetts law that require action by the board of directors including, without limitation, the Board may not delegate the power to change the location of the principal office of the NON-PROFIT. The board of directors may not exercise the powers in Section 3.11 that are reserved exclusively to the Member(s). Subject to these Bylaws and applicable law, the board of directors may authorize the Member(s), officers, attorneys or agents of the NON-PROFIT to act on its behalf subject to such limitations as the board of directors determines.

ARTICLE 5

Officers

Section 5.1 Officers. The officers of the NON-PROFIT shall be a president, treasurer and a clerk, and such other officers as may be elected in accordance with the provisions of this Article 5.

Section 5.2 Appointment. The officers of the NON-PROFIT shall be appointed by the board of directors at least one time every two (2) years. Each officer shall hold office until a successor shall have been elected and qualified.

Section 5.3 Vacancies. A vacancy in any office because of death, resignation, disqualification, or otherwise may be filled by the board of directors for the unexpired portion of the term.

Section 5.4 Removal. Any officer may be removed for cause, by a vote of a majority of the entire board of directors at any meeting of the board of directors. No officer shall be removed from office unless the notice of the meeting at which removal is to be considered states such purpose and opportunity to be heard at such meeting is given to the officer whose removal is sought. Notwithstanding the notice provision of Section 4.4 above, written notice shall be delivered to all directors at least fourteen (14) days in advance of a meeting at which removal is sought. For the purpose of this Section “Cause” shall mean if any officer: (1) fails to qualify as a dispensary agent as determined by the Massachusetts Department of Public Health (“DPH”); (2) is found unsuitable or unqualified to sit as director of a registered marijuana dispensary as determined by DPH pursuant to written notice to the NON-PROFIT; or (3) engages in any negligent, reckless, or intentional action or inaction that causes substantial financial or reputational injury to the NON-PROFIT, or jeopardizes the NON-PROFIT’S ability to receive or renew a marijuana dispensary registration, as determined in a written opinion of the NON-PROFIT’S legal counsel.

Section 5.5 President. The president shall preside at all meetings of the board of directors. The president, or other proper officer or agent of the NON-PROFIT authorized by the board of directors, may sign any deeds, mortgages, bonds, contracts, or other instruments which the board of directors has authorized to be executed. The president shall perform all duties incident to the office of president and such other duties as may be prescribed by the board of directors from time to time.

Section 5.6 Treasurer. The treasurer, or other proper officer or agent of the NON-PROFIT authorized by the board of directors, shall have charge and custody of and be responsible for all funds and securities of the NON-PROFIT; receive and give receipt for moneys due and payable to the NON-PROFIT from any source whatsoever, and deposit all such moneys in the name of the NON-PROFIT in such banks, trust companies, or other depositories as shall be selected by the board of directors; and in general perform all of the duties incident to the office of treasurer and such others as may from time to time be assigned by the board of directors.

Section 5.7 Clerk. The clerk shall keep the minutes of the meetings of the board of directors in one or more books provided for that purpose; ensure that all notices are given in accordance with the provisions of these bylaws; be custodian of the corporate records; and in general perform all such duties as may from time to time be assigned by the board of directors.

ARTICLE 6

Corporate Transactions

Section 6.1 Contracts. The board of directors may authorize any officer or officers, agent or agents of the NON-PROFIT in addition to the officers so authorized by these by-laws, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the NON-PROFIT, and such authority may be general or confined by specific instances.

Section 6.2 Indebtedness. All checks, drafts, or orders for the payment of money, notes, or other evidence of indebtedness issued in the name of the NON-PROFIT, shall be signed by the president, vice president or treasurer, or such other officer or agent of the NON-PROFIT as from time to time may be determined by the board of directors. In the absence of such determination of the board, such instruments shall be signed by the president or treasurer of the NON-PROFIT.

Section 6.3 Deposits. All funds of the NON-PROFIT shall be deposited from time to time to the credit of the NON-PROFIT in such banks, trust companies, brokerages, or other depositories as the board of directors shall select.

ARTICLE 7

Books and Records

The NON-PROFIT shall keep at the principal office of the NON-PROFIT correct and complete books and records of account; minutes of the proceedings of board of directors; and a register of the names and addresses of the directors of the NON-PROFIT. All books, and records of the NON-PROFIT may be inspected by any Member(s), director, or agent or attorney thereof, for any proper purpose at any reasonable time.

ARTICLE 8

Restrictions on Activities

No part of the net earnings of the NON-PROFIT shall inure to the benefit of, or be distributable to its directors, officers, or other private persons, except that the NON-PROFIT shall be authorized and empowered to pay reasonable compensation for services rendered, to make payments and distributions in furtherance of the purposes of the NON-PROFIT, and to pay a reasonable stipend to directors as described in Section 3.10 above.

ARTICLE 9

Dissolution

In the event of dissolution of the NON-PROFIT, the board of directors shall, after paying or making provisions for the payment of all of the liabilities of the NON-PROFIT, dispose of all the assets of the NON-PROFIT exclusively for the purposes of the NON-PROFIT, as the board of directors shall determine, in accordance with the statutes of the Commonwealth of Massachusetts.

ARTICLE 10

Conflicts of Interest

Whenever a Member, director or officer has a financial or personal interest in any matter coming before the board of directors, the affected person shall a) fully disclose the nature of the interest and b) withdraw from discussion, lobbying, and voting on the matter. Any transaction or vote involving a potential conflict of interest shall be approved only when a majority of disinterested directors determine that it is in the best interest of the NON-PROFIT to do so. The minutes of meetings at which such votes are taken shall record such disclosure, abstention and rationale for approval. This Article 10 may be further defined in applicable policy adopted by the board or directors.

ARTICLE 11

Personal Liability

No Member, officer or director of the NON-PROFIT shall be personally liable to the NON-PROFIT for monetary damages for or arising out of a breach of fiduciary duty as a Member, officer or director notwithstanding any provision of law imposing such liability; provided, however, that the foregoing shall not eliminate or limit the liability of a Member, officer or director to the extent that such liability is imposed by applicable law (i) for a breach of the Member's, officer's or director's duty of loyalty to the NON-PROFIT or its members, (ii) for acts or omissions not in good faith or which involve intentional misconduct

or a knowing violation of applicable state or local law, or (iii) for any transaction from which the officer or director derived an improper personal benefit.

ARTICLE 12

Indemnification

The NON-PROFIT shall, to the extent legally permissible, indemnify each person who may serve or who has served at any time as a Member, officer or director of the NON-PROFIT against all expenses and liabilities, including, without limitation, counsel fees, judgments, fines, excise taxes, penalties and settlement payments, reasonably incurred by or imposed upon such person in connection with any threatened, pending or completed action, suit or proceeding in which he or she may become involved by reason of his or her service in such capacity; provided that no indemnification shall be provided for any such person with respect to any matter as to which he or she shall have been finally adjudicated in any proceeding not to have acted in good faith in the reasonable belief that such action was in the best interests of the NON-PROFIT; and further provided that any compromise or settlement payment shall be approved by a majority vote of a quorum of directors who are not at that time parties to the proceeding.

The indemnification provided hereunder shall inure to the benefit of the heirs, executors and administrators of persons entitled to indemnification hereunder. The right of indemnification under this Article 12 shall be in addition to and not exclusive of all other rights to which any person may be entitled.

This Article 12 constitutes a contract between the NON-PROFIT and the indemnified Member(s), officers and directors. No amendment or repeal of the provisions of this Article 12 which adversely affects the right of an indemnified officer or director under this Article 12 shall apply to such officer or director with respect to those acts or omissions which occurred at any time prior to such amendment or repeal.

ARTICLE 13

Amendments to By-Laws

These By-Laws may be amended or repealed by a majority vote of the Member(s).

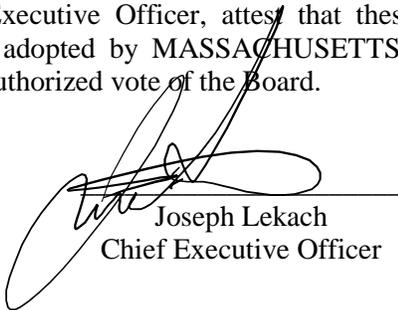
ARTICLE 14

Policies

The board of directors may adopt policies that shall be incorporated into these By-Laws. The following policies have been adopted and incorporated herein:

- Appendix 1: Conflict of Interest Policy
- Appendix 2: Whistleblower Policy
- Appendix 3: Document Retention and Destruction Policy
- Appendix 4: Compensation Setting Policy
- Appendix 5: Comprehensive Information Security Policy
- Appendix 6: Antitrust Policy

I, Joseph Lekach, the Chief Executive Officer, attest that these Third Amended By-Laws with the incorporated Appendices were adopted by MASSACHUSETTS PATIENT FOUNDATION, INC. on December 21, 2017, by a duly authorized vote of the Board.



Joseph Lekach
Chief Executive Officer

**MASSACHUSETTS PATIENT FOUNDATION, INC.
CONFLICT OF INTEREST POLICY**

I. Definitions

For purposes of this policy, the term "interest" shall include any personal connection or connection as a Member, director, officer, member, stockholder, shareholder, partner, manager, trustee, beneficiary, employee or consultant of any concern on the part of a Member, director, officer or key employee of MASSACHUSETTS PATIENT FOUNDATION, INC. the ("NON-PROFIT") or his/her immediate family member.

The term "concern" shall mean any corporation, association, trust, partnership, limited liability group, firm, person or entity other than the NON-PROFIT.

II. Policy

No Member, director, officer or key employee of the NON-PROFIT shall be disqualified from holding any office or post in the NON-PROFIT by reason of any interest in any concern. A Member, director, officer or key employee of the NON-PROFIT shall not be disqualified from engaging, either as vendor, purchaser or otherwise, or contracting or entering into any transaction with the NON-PROFIT or with any entity of which the NON-PROFIT is an affiliate, provided, however, that the following precautions are undertaken:

1. The interest of such Member, director, officer or key employee is fully disclosed to the board of directors prior to its entering into the transaction.
2. No interested Member, director, officer or key employee may vote or lobby (lobbying shall not include presenting to the board or a director about the benefits of the transaction) on the matter or be counted in determining the existence of a quorum at the meeting of the board of directors at which such matter is voted upon.
3. Any transaction in which a Member, director, officer or key employee has an interest shall be duly approved by the disinterested directors as being in the best interest of the NON-PROFIT. The disinterested directors shall seek and examine comparison data, showing the availability and price of alternative transactions, in making such determination.
4. Payments to the interested Member, director, officer, or key employee shall be reasonable and shall not exceed fair market value.
5. The minutes of the meeting at which the disinterested directors vote on the transaction shall reflect that disclosure of the potential conflict was made, that the interested director(s) abstained from voting, the rationale for approval, and how each disinterested director voted. The minutes shall be prepared and finalized within thirty (30) days of such meeting.

Members, directors, officers and key employees are required to disclose interests that could give rise to conflicts at least annually.

**MASSACHUSETTS PATIENT FOUNDATION, INC.
WHISTLEBLOWER POLICY**

I. Expectation

MASSACHUSETTS PATIENT FOUNDATION, INC., the (“NON-PROFIT”) expects Members, directors, officers and employees to observe high ethical standards in carrying out their responsibilities and to comply with all applicable laws and regulations.

II. Open Door Policy

If any Member, director, officer or employee has complaints, concerns, or questions as to the ethics or legality of a particular action taken by another Member, director, officer or employee, he/she is encouraged to raise such complaints, concerns or questions with the relevant individual. With respect to Members, the relevant individual is the Original member, or the president of the Board of Directors or any Director. With respect to directors, the relevant individual is a Member, the president of the board of directors or any other director. With respect to officers and employees, the relevant individual is the Chief Executive Officer, if there is one in office, and if not, any member of the board. In the event the Member, director, officer or employee believes there may have been a legal transgression, and that it is not reasonable to raise the issue with a board member or the Chief Executive Officer, he/she should contact an outside attorney. Anyone filing a complaint concerning a violation or suspected violation of a law, regulation or ethical requirement must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Individuals making baseless or malicious accusations will be disciplined up to and including termination.

III. Requirement of Investigation

Within a reasonable time of receiving a complaint, concern or question regarding compliance with a law, regulation or ethics requirement, the Member, Chief Executive Officer and/or board member shall open an investigation into the matter and pursue it to resolution. Should the Member, Chief Executive Officer or board member find that a law, regulation or ethics requirement has been violated, appropriate action should be taken.

IV. Confidentiality

To the degree possible, the names of the individuals reporting under this Whistleblower Policy shall be kept confidential.

V. Protection from Retaliatory Action

Neither the NON-PROFIT nor its Members, directors, officers, or employees may take any negative employment or other retaliatory action against any Member, director, officer or employee who in good faith reports a violation of a law or regulatory requirement. A Member, director, officer, or employee who retaliates against someone who has reported a violation in good faith is subject to discipline including, but not limited to, termination of employment.

VI. General Policy

This general policy is not a contract and it may be rescinded or amended at any time by the NON-PROFIT. It is not intended to and does not create any legally enforceable rights whatsoever for any employee.

**MASSACHUSETTS PATIENT FOUNDATION, INC.
DOCUMENT RETENTION AND DESTRUCTION POLICY**

I. Retention Policy

Massachusetts Patient Foundation, Inc. the (“NON-PROFIT”) takes seriously its obligations to preserve information relating to litigation, audits, and investigations. The information listed in the retention schedule below is intended as a guideline and may not contain all the records the NON-PROFIT may be required to keep in the future, and may include records that the NON-PROFIT is not required to keep.

From time to time, the NON-PROFIT may suspend the destruction of records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, government investigations, or similar proceedings.

| File Category | Item | Retention Period |
|-----------------------------------|---|-----------------------------------|
| Corporate Records | <i>By-Laws and Articles of Organization</i> | Permanent |
| | <i>Member and Board resolutions</i> | Permanent |
| | <i>Member and Board and committee meeting agendas and minutes</i> | Permanent |
| | <i>Minutes</i> <i>Conflict-of-interest disclosure forms</i> | 4 years |
| Finance and Administration | <i>Financial statements (audited)</i> | 7 years |
| | <i>Auditor management letters</i> | 7 years |
| | <i>Payroll records</i> | 7 years |
| | <i>Check register and checks</i> | 7 years |
| | <i>Bank deposits and statements</i> | 7 years |
| | <i>Chart of accounts</i> | 7 years |
| | <i>General ledgers and journals (includes bank reconciliations)</i> | 7 years |
| | <i>Investment performance reports</i> | 7 years |
| | <i>Equipment files and maintenance records</i> | 7 years after disposition |
| | <i>Contracts and agreements</i> | 7 years after all obligations end |
| <i>Correspondence — general</i> | 3 years | |
| Insurance Records | <i>Policies — occurrence type</i> | Permanent |
| | <i>Policies — claims-made type</i> | Permanent |
| | <i>Accident reports</i> | 7 years |
| | <i>Safety (OSHA) reports</i> | 7 years |
| | <i>Claims (after settlement)</i> | 7 years |
| | <i>Group disability records</i> | 7 years after end of benefits |

| | | |
|------------------------|---|--|
| Real Estate | <i>Deeds</i> | Permanent |
| | <i>Leases (expired)</i> | 7 years after all obligations end |
| | <i>Mortgages, security agreements</i> | 7 years after all obligations end |
| Tax | <i>IRS Tax returns and related correspondence</i> | Permanent |
| | <i>IRS Form 1120s</i> | 7 years |
| | <i>State Tax returns</i> | 7 years |
| Human Resources | <i>Employee personnel files</i> | Permanent |
| | <i>Retirement plan benefits (plan descriptions, plan documents)</i> | Permanent |
| | <i>Employee handbooks</i> | Permanent |
| | <i>Workers comp claims (after settlement)</i> | 7 years |
| | <i>Employee orientation and training materials</i> | 7 years after use ends |
| | <i>Employment applications</i> | 3 years |
| | <i>IRS Form I-9 (store separate from personnel file)</i> | Greater of 1 year after end of service, or three years |
| | <i>Withholding tax statements</i> | 7 years |
| | <i>Timecards</i> | 3 years |
| Technology | <i>Software licenses and support agreements</i> | 7 years after all obligations end |

II. Electronic Documents and Records

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an “archive” computer file folder. Backup and recovery methods should be tested on a regular basis.

III. Emergency Planning

The NON-PROFIT’S records should be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping the NON-PROFIT operating in an emergency will, if possible, be duplicated or backed up at least weekly and maintained off-site.

IV. Document Destruction

Documents should be eliminated at the end of the relevant retention period. Destruction of financial and personnel-related documents should be accomplished by shredding. Document destruction with respect to relevant documents will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation or lawsuit.

V. Compliance

The NON-PROFIT will periodically review these procedures with legal counsel or a certified public accountant to ensure that they are in compliance with new or revised regulations.

**MASSACHUSETTS PATIENT FOUNDATION, INC.
COMPENSATION SETTING POLICY**

I. Introduction

This policy codifies the procedures by which the board of directors of MASSACHUSETTS PATIENT FOUNDATION, INC. the (“NON-PROFIT”) sets the compensation of Members, directors, top management officials, officers and key employees (“Executive Compensation”). These procedures are designed to comply with the “safe harbor” requirements set forth in the tax regulations on intermediate sanctions to create a rebuttable presumption of reasonableness in compensation levels.

II. Policy

The board of directors shall oversee the setting of Executive Compensation and shall (1) determine compensation of all Members, directors, top management officials, officers and key employees, and (2) review, assess and approve the reasonableness of such compensation on a regular basis.

In order to be approved as reasonable, compensation must be an amount that would ordinarily be paid for comparable work by similarly situated organizations under like circumstances. The particular education, experience and skill of the compensated individual may also be taken into account.

III. Guidelines

Compensation determinations made by the directors will be made in accordance with the following guidelines:

- i. In setting and determining the reasonableness of Executive Compensation, the board shall obtain and rely upon compensation information for comparable work by similarly situated organizations under like circumstances, as defined in Section II above.
- ii. Board directors involved in setting and approving Executive Compensation, as well as any third parties providing professional advice to the board of directors in connection with setting and approving Executive Compensation shall be independent and have no conflicts of interest as to the executive whose compensation is being reviewed. Board directors shall have no conflict of interest for these purposes if they (i) will not economically benefit from the compensation arrangement, (ii) are not family members of a person who will economically benefit, (iii) have no material financial interest affected by the compensation arrangement, and (iv) are not family members of a person who has a material financial interest affected by the compensation arrangement.
- iii. Timely and accurate minutes of all final actions by the board regarding the setting and approval of Executive Compensation will be recorded and held with board records. Such minutes will include (1) the terms of the approved compensation arrangement and the date approved, (2) a list of the directors present during discussion, showing those who approved the arrangement, those who rejected it and those who recused themselves due to conflicts of interest, (3) the comparability data relied upon and how such data was obtained, and (4) the rationale for determining that the arrangement was reasonable if it exceeded the range of the comparability data.

**MASSACHUSETTS PATIENT FOUNDATION, INC.
COMPREHENSIVE INFORMATION SECURITY POLICY**

I. OBJECTIVE

It is the objective of MASSACHUSETTS PATIENT FOUNDATION, INC. (“NON-PROFIT”) in the development and implementation of this comprehensive information security program (“CISP”) to create effective administrative, technical and physical safeguards for the protection of personal information, and to comply with obligations under 201 CMR 17.00. This CISP sets forth our procedure for evaluating our electronic and physical methods of accessing, collecting, storing, using, transmitting, and protecting personal information. For purposes of this CISP, “personal information” means an individual’s first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such resident: (a) Social Security number; (b) driver’s license number or state-issued identification card number; or (c) financial account number, or credit or debit card number, with or without any required security code, access code, personal identification number or password, that would permit access to an individual’s financial account; provided, however, that “personal information” shall not include information that is lawfully obtained from publicly available information, or from federal, state or local government records lawfully made available to the general public. The NON-PROFIT generally acquires personal information in connection with hiring employees and payroll, and in connection with sales to the public.

II. PURPOSE

The purpose of the CISP is to:

- Ensure the security and confidentiality of personal information;
- Protect against any anticipated threats or hazards to the security or integrity of such information; and
- Protect against unauthorized access to or use of such information in a manner that creates a substantial risk of identity theft or fraud.

III. DATA SECURITY COORDINATOR

The NON-PROFIT appoints the Treasurer to be its Data Security Coordinator. The Data Security Coordinator will be responsible for:

- Initial implementation of the CISP;
- Regular testing of the CISP’s safeguards;
- Evaluating the ability of each of NON-PROFIT’S third party service providers to implement and maintain appropriate security measures for the personal information to which the NON-PROFIT permits them access, and requiring such third party service providers to implement and maintain appropriate security measures;
- Reviewing the scope of the security measures in the CISP at least annually, or whenever there is a material change in the NON-PROFIT’S business practices that may implicate the security or integrity of records containing personal information; and

- Conducting an annual training session for all Members, directors, officers, employees, volunteers and independent contractors, including temporary and contract employees who have access to personal information on the elements of the CISP.

IV. HANDLING PERSONAL INFORMATION

A. Paper Records

All paper records containing personal information shall be kept in a locked file cabinet with restricted access. Paper records will be destroyed regularly in accordance with NON-PROFIT'S document destruction policy using an office-grade shredder. Records containing personal information may not be taken out of the office and may be accessed only by personnel with a business necessity. Checks that need to be transported from the dispensary to the bank may be sent by US mail or hand delivered by the responsible employee, and if hand delivered, will not be left unattended at any point in the transition.

Checks. When the NON-PROFIT receives checks from members of the public, it will make only one hard copy and keep it in a locked file cabinet with restricted access. The checks themselves will also be kept under lock and key until they are deposited.

Paper employment records. Paper employment records must be kept under lock and key and accessed only by staff members responsible for employment issues and/or by the Chief Executive Officer.

B. Electronically Held Records

The NON-PROFIT requires the following security systems with respect to the maintenance of personal information on its computers:

Authentication Protocols. The Data Security Coordinator shall secure user authentication protocols including:

- Control of user IDs and other identifiers;
- A reasonably secure method of assigning and selecting passwords, or use of unique identifier technologies, such as biometrics or token devices;
- Control of data security passwords to ensure that such passwords are kept in a location and/or format that does not compromise the security of the data they protect;
- Restricting access to active users and active user accounts only; and
- Blocking access to user identification after multiple unsuccessful attempts to gain access.

Access Protocols. The Data Security Coordinator shall implement the following secure access control measures:

- Restrict access to records and files containing personal information to those who need such information to perform their job duties; and
- Assign unique identifications plus passwords, which are not vendor supplied default passwords, to each person with computer access that is reasonably designed to maintain the integrity of the security of the access controls.

Restriction on E-mailing Personal Information. The NON-PROFIT will not, as a general rule, send or accept personal information by e-mail. To the extent exceptions must be made, the security measures described in this CISP shall be taken.

Encryption. Should any records and files containing personal information be transmitted across public networks or wirelessly, such records or files shall be encrypted. Personal information stored on laptops and other portable devices shall also be encrypted.

Monitoring. The NON-PROFIT shall take all steps necessary to reasonably monitor its computer network for unauthorized use of or access to personal information.

Firewalls. All files containing personal information on a system that is connected to the Internet shall be protected by a reasonably up-to-date firewall protection and operating system security patches designed to maintain the integrity of the personal information.

Virus protection. All computers containing personal information shall be protected by reasonably up-to-date versions of system security agent software, including malware protection and reasonably up-to-date patches and virus definitions, or a version of such software that can still be supported with up-to-date patches and virus definitions, and is set to receive the most current security updates on a regular basis.

C. Vendors

Pursuant to 105 CMR 725.200, information held by the NON-PROFIT about dispensary agents is confidential and shall not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction, provided however, the Department may access this information to carry out official duties. Only upon receipt of written consent of the individual to whom the confidential information applies will the NON-PROFIT share personal and financial information with its vendors. The NON-PROFIT requires each of their vendors to send written evidence, signed by an authorized person, confirming that they follow a confidentiality plan that fully complies with 105 CMR 725.200 and 201 CMR 17.00.

V. Training

The Data Security Coordinator shall ensure that all employees, whether full-time, part-time, seasonal or temporary, and independent contractors, consultants and volunteers who have access to personal information are trained on the data security requirements provided in this CISP.

VI. PERSONS SEPARATING FROM NON-PROFIT

All employees, whether full-time, part-time, seasonal or temporary, and independent contractors, consultants and volunteers upon termination or resignation shall immediately be denied access to physical and electronic records containing personal information and will be required to return or destroy all records and files containing personal information in any form that may at the time of such termination or resignation be in their possession or control, including all such information stored on laptops, portable devices, or other media, or in files, records, notes, or papers.

VII. SECURITY BREACH AND NOTIFICATION

All employees, whether full-time, part-time, seasonal or temporary, and independent contractors, consultants and volunteers, shall as soon as practicable and without unreasonable delay notify the Data Security Coordinator when such person knows or has reason to know of a security breach or when the person knows or has reason to know that personal information was acquired or used by an unauthorized person or used for an unauthorized purpose.

A “security breach” is any unauthorized acquisition or unauthorized use of unencrypted data or, encrypted electronic data and the confidential process or key that is capable of compromising the security, confidentiality, or integrity of personal information that creates a substantial risk of identity theft or fraud.

A good faith but unauthorized acquisition of personal information by a person or agency, or employee or agent thereof, for lawful purposes, is not a breach of security unless the personal information is used in an unauthorized manner or subject to further unauthorized disclosure.

When the Data Security Coordinator is informed of a security breach, she will (1) notify the individual whose information was compromised, and (2) notify the Massachusetts Attorney General and the Office of Consumer Affairs and Business Regulation.

The notice to the individual will be in writing, possibly by electronic mail, and will include the following information:

- A general description of the incident;
- Identification of the personal information that may be at risk;
- A description of the security program;
- A phone number to call for further information;
- Suggestion of extra caution, to review account statements, and to obtain a credit report; and
- Phone numbers and addresses of the Federal Trade Commission, state agencies that may be of assistance, and major consumer reporting agencies. The notice will not be provided if law enforcement personnel advise against it.

The notice to the Office of Consumer Affairs and Business Regulation and to the Attorney General will include the following:

- A detailed description of the nature and circumstances of the breach of security;
- The number of people affected as of the time of notification;
- The steps already taken relative to the incident;
- Any steps intended to be taken relative to the incident subsequent to notification; and
- Information regarding whether law enforcement is engaged investigating the incident.

Non-Retaliation. The NON-PROFIT will not retaliate against anyone who reports a security breach or non-compliance with CISP, or who cooperates in an investigation regarding such breach or non-compliance. Any such retaliation will result in disciplinary action by the responsible parties up to and including suspension or termination.

Documentation. The NON-PROFIT shall document all responsive actions taken in connection with any incident involving a security breach.

VIII. CONFIDENTIALITY

Notwithstanding anything to the contrary contained herein, information held by the NON-PROFIT about registered qualifying patients, personal caregivers, and dispensary agents is confidential and shall not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction, provided however, the Department may access this information to carry out official duties.

**MASSACHUSETTS PATIENT FOUNDATION, INC.
ANTITRUST POLICY**

It is the policy of MASSACHUSETTS PATIENT FOUNDATION, INC., the (“NON-PROFIT”) to comply fully with all federal and state antitrust laws, which prohibit companies from working together to restrict competition. It is also the policy of the NON-PROFIT that it and its directors and officers are informed about antitrust laws and recognize possible antitrust issues or questions.

It is legal for competitors within the medical use of marijuana industry to work together, unless such work unlawfully restricts competition within the industry. Although the NON-PROFIT’S activities generally do not present antitrust issues, to ensure against inadvertent violations of federal and state antitrust laws, directors, except to insure that prices are reasonable and affordable for the NON-PROFIT’S patients, and to prevent diversion for non-medical purposes, Members, directors, officers and employees shall not discuss with competitors the following: increasing, decreasing, or stabilizing prices for medical marijuana or related products and services; and establishing market monopolies for products or services.

Furthermore, Members, directors, officers, and employees shall not engage in any actions in the context of the NON-PROFIT’S activities which appear to be anti-competitive in purpose or inconsistent with this policy.

Any questions regarding antitrust issues and the NON-PROFIT’S activities shall be directed to the President, if any, and referred to counsel if deemed necessary.

Pursuant to 105 CMR 725.100(A)(2), no executive, member, director or any entity owned or controlled by such executive, member or director may directly or indirectly control more than three (3) registered marijuana dispensaries in the Commonwealth of Massachusetts.

VICENTE SEDERBERG

BOSTON | DENVER | JACKSONVILLE | LOS ANGELES LLC

2 SEAPORT LANE, 11TH FLOOR
BOSTON, MA 02210
TEL: 617.934.2121

October 22, 2018

Massachusetts Cannabis Control Commission
101 Federal Street, 13th Floor
Boston, MA 02110

Re: Change of Name from Massachusetts Patient Foundation, Inc. to Apothca, Inc.

To Whom It May Concern:

Please be advised that Massachusetts Patient Foundation, Inc. ("MPF") has changed its corporate name to Apothca, Inc. ("Apothca"). Apothca filed a Change of Name Application with the Massachusetts Department of Public Health (the "Department") on October 5, 2018 and received approval from the Department on October 10, 2018 to change the corporation's name to Apothca. Apothca subsequently amended its name with the Secretary of the Commonwealth on October 16, 2018 and submitted a Certificate of Good Standing with the Department on October 17, 2018 (as per the requirements of the Change of Name Application).

A copy of the Certificate of Good Standing has been separately uploaded into the MassCIP as evidence of this change.

Please do not hesitate to contact our office if anything further is required in this matter.

Sincerely,



David M. Ullian, Esq.

DMU/tc



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

William Francis Galvin
Secretary of the
Commonwealth

Date: October 16, 2018

To Whom It May Concern :

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

is a domestic corporation organized on **June 17, 2015**

I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 180 section 26 A, for revocation of the charter of said corporation; that the State Secretary has not received notice of dissolution of the corporation pursuant to Massachusetts General Laws, Chapter 180, Section 11, 11A, or 11B; that said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,
I have hereunto affixed the
Great Seal of the Commonwealth
on the date first above written.

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 18100314210

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

Processed by:



**The Commonwealth of Massachusetts
William Francis Galvin**

Minimum Fee: \$15.00

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

Articles of Amendment

(General Laws, Chapter 180, Section 7)

Identification Number: 001177859

We, JOSEPH LEKACH President Vice President,

and LEON NITKA Clerk Assistant Clerk ,

of MASSACHUSETTS PATIENT FOUNDATION, INC.
located at: 36 GLEN AVENUE NEWTON , MA 02459 USA

do hereby certify that these Articles of Amendment affecting articles numbered:

Article 1 Article 2 Article 3 Article 4

(Select those articles 1, 2, 3, and/or 4 that are being amended)

of the Articles of Organization were duly adopted at a meeting held on 9/24/2018 , by vote of: 0 members, 5 directors, or 0 shareholders, being at least two-thirds of its members/directors legally qualified to vote in meetings of the corporation (or, in the case of a corporation having capital stock, by the holders of at least two thirds of the capital stock having the right to vote therein):

ARTICLE I

The exact name of the corporation, **as amended**, is:
(Do not state Article I if it has not been amended.)

APOTHCA, INC.

ARTICLE II

The purpose of the corporation, **as amended**, is to engage in the following business activities:
(Do not state Article II if it has not been amended.)

ARTICLE III

A corporation may have one or more classes of members. **As amended**, the designation of such classes, the manner of election or appointments, the duration of membership and the qualifications and rights, including voting rights, of the members of each class, may be set forth in the by-laws of the corporation or may be set forth below:

ARTICLE IV

As amended, other lawful provisions, if any, for the conduct and regulation of the business and affairs of the corporation, for its voluntary dissolution, or for limiting, defining, or regulating the powers of the business entity, or of its

directors or members, or of any class of members, are as follows:
(If there are no provisions state "NONE")

The foregoing amendment(s) will become effective when these Articles of Amendment are filed in accordance with General Laws, Chapter 180, Section 7 unless these articles specify, in accordance with the vote adopting the amendment, a *later* effective date not more than *thirty days* after such filing, in which event the amendment will become effective on such later date.

Later Effective Date:

**Signed under the penalties of perjury, this 16 Day of October, 2018, JOSEPH LEKACH , its ,
President / Vice President,
LEON NITKA , Clerk / Assistant Clerk.**

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:

October 16, 2018 03:20 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



The City of Fitchburg
Massachusetts
OFFICE OF THE MAYOR

STEPHEN L. DINATALE
MAYOR

166 BOULDER DRIVE
FITCHBURG, MA 01420
TEL. (978) 829-1801

AARON TOURIGNY
CHIEF OF STAFF

ATOIRIGNY@FITCHBURGMA.GOV

JOAN DAVID
ADMINISTRATIVE AIDE
JDAVID@FITCHBURGMA.GOV

November 9, 2018

Phillip C. Silverman, Esq.
Vicente Sederberg, LLC
2 Seaport Lane, 11th Floor
Boston, MA 02210

RE: Change of name, Massachusetts Patient Foundation, Inc. to Apothca, Inc.

Dear Attorney Silverman,

Please be advised my office recently received notification from Vicente Sederberg on November 5, 2018, in regards to Massachusetts Patient Foundation, Inc.'s change of name to Apothca, Inc.

I have properly notified our Legal Department of the same.

If you have any questions, please feel free to contact my office.

Regards,

Stephen L. DiNatale
Mayor



APOTHCA

Apothca, Inc.

Business Plan

1. EXECUTIVE SUMMARY

1.1 Mission Statement and Message from the CEO

Apothca Inc. (“**Apothca**”) is currently operating as a Registered Marijuana Dispensary (“**RMD**”) and a Marijuana Establishment with a mission to provide high quality, medical-grade cannabis to registered patients and consumers in the Commonwealth in a safe and welcoming environment. Apothca is committed to the safety of patients, consumers, and the community. Apothca is passionate about helping patients suffering from debilitating conditions and diseases through medical cannabis.

Apothca plans to operate a Marijuana Cultivator, Marijuana Product Manufacturer and Marijuana Transporter out of the Fitchburg facility. Additionally, Apothca plans to operate a Marijuana Retailer in Lynn, Arlington, and Boston.

1.2 Product

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

1. Topical Salves
2. Creams/ Lotions
3. Patches
4. Oral Mucosal/ Sublingual Dissolving Tablets
5. Tinctures
6. Sprays
7. Inhalation ready to use CO2 Extracted Hash Oils
8. Pre-Dosed Oil Vaporizers
9. Ingestion Capsules
10. Food/Beverages/Single Serve Shots

1.3 Customers

Apothca's target customers include registered, qualifying patients, their caregivers, and adults over the age of 21.

1.4 What Drives Us

Apothca's goals include:

1. Separately serving customers and patients and their caregivers with high quality, consistent, laboratory-tested medical-grade cannabis and derivatives
2. Serving customers over the age of 21 with a wide variety of high quality, consistent, laboratory-tested cannabis and derivatives
3. Assisting local communities in offsetting the cost of Apothca's operations within their communities
4. Hiring employees and contractors from within the communities we serve
5. Hiring employees and contractors from communities that have been particularly harmed by the war on drugs
6. Hiring employees from economically distressed communities and giving them the space and knowledge to flourish professionally within Apothca and the cannabis industry as a whole
7. Having a diverse and socially representative pool of employees
8. Empower the next generation of entrepreneurs and leaders through hiring, training, and teaching through programs Apothca plans to create such as a cannabis incubator and accelerator
9. Being the most environmentally friendly cannabis operator in the Commonwealth of Massachusetts through the use of our cultivation methods which include, but are not limited to, climate-controlled greenhouses, evaporative cooling technologies in lieu of traditional HVAC systems, tapping into well-water, and more
10. Creating branded marijuana products that stand for safe, effective, consistent, and high quality cannabis products

2. COMPANY DESCRIPTION

2.1 Structure

Apothca is currently a Massachusetts domestic not-for-profit corporation operating two RMDs, Provisionally Licensed to operate an adult-use cultivation and product manufacturing facility, and operates an adult-use retailer in Lynn. Apothca is also interested in applying for a Certificate of Registration from the Massachusetts Cannabis Control Commission (the “**Commission**”) to operate Marijuana Retailer facilities in the Town of Arlington and City of Boston.

Apothca will file, in a form and manner specified by the Commission, an application for licensure as a ME consisting of three packets: an Application of Intent packet; a Background Check packet; and a Management and Operations Profile packet.

2.2 Operations

In Fitchburg, Apothca plans to operate a Marijuana Cultivator, Marijuana Product Manufacturer, and a Marijuana Transporter, co-located with Apothca's existing infrastructure, conducting similar activities as an RMD. Apothca also plans to become a Marijuana Retailer, co-located with Apothca's retail RMD facilities in Lynn, Arlington and Boston.

Apothca's Marijuana Cultivation, Marijuana Product Manufacturing, and Marijuana Transportation Facility will be located at Apothca's RMD facility, currently under lease and operational, at 99 Development Rd, Fitchburg, MA 01420 (all actives referred to, collectively, as “**Fitchburg Facility**”).

Apothca's Fitchburg Facility is well positioned to match the ideal picture of a community cultivation, production, research and transportation facility. Before taking over the Fitchburg Facility, it was a defunct Bayer Pharmaceutical campus and remains in good condition.

The Fitchburg Facility encompasses 11 buildings totaling over 130,000 square feet on over 26 acres of land. Currently, Apothca is using 32,500 square feet of newly built, climate controlled greenhouses for flowering canopy, roughly 7,000 square feet as a head house consisting of an employee entrance, preparation area, mother room, clone/vegetative room, irrigation room, and a room dedicated to the greenhouse system controls. Additionally, Apothca has a single building in operation, totaling roughly 5,000 square feet, dedicated to drying marijuana cultivated within the greenhouses and an additional building roughly 15,000 square feet (on each of two floors). Operations on the first floor consist of:

1. Employee entrance
2. Extraction
3. Processing
4. Infused products manufacturing
5. Packaging
6. Secure storage
7. Flower trimming
8. Beverage manufacturing

9. Distribution

Operations of the second floor consist of:

1. Administrative offices
2. Security room
3. IT room

Apothca has established inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of marijuana products in the process of cultivation, and finished, stored marijuana; conduct of a monthly inventory of marijuana in the process of cultivation and finished, stored marijuana; conduct of a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and prompt transcription of inventories if taken by use of an oral recording device.

Apothca will tag and track all marijuana seeds, clones, plants, and marijuana products, using Metrc and a seed-to-sale methodology (currently BioTrackTHC) in a form and manner to be approved by the Commission.

No marijuana product, including marijuana, will be sold or otherwise marketed that is not tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

Apothca maintains, and will continue to maintain, records, including all records required in any section of 935 CMR 500.000, which will be available for inspection by the Commission, upon request. The records shall be maintained in accordance with generally accepted accounting principles. Records shall be maintained for at least 12 months.

Apothca has obtained for its RMD activities, and shall obtain and maintain for its adult-use activities, general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy shall be no higher than \$5,000 per occurrence.

Apothca currently provides, and will continue to provide, adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110.

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

Apothca has demonstrated, and will continue to demonstrate, consideration of the factors for Energy Efficiency and Conservation outlined in 935 CMR 500.105(15) as part of its operating plan and application for licensure.

Apothca has obtained and shall provide proof of having obtained a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation Fund to ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000 on the cessation of operation of Apothca and Apothca agents shall comply with all local rules, regulations, ordinances, and bylaws.

Apothca has achieved:

1. RMD Priority Applicant Status
2. Final Certificate of Registration by The Department of Public Health
3. Letter of Non-Opposition for Medical operations and community host agreements for both Medical and Adult-Use Operations
4. Architectural Review for Medical Operations
5. Special Permits for Medical Operations
6. Certificate of Occupancies for Existing Operations
7. Provisional Licensing by the Commission for adult-use cultivation and product manufacturing.
8. Commence Operations for a Marijuana Retailer facility in Lynn.

2.3 Security

Apothca has contracted with two professional security and alarm companies, DGA Security and Wayne Alarm, which have designed, implemented and currently monitor our comprehensive security plan to ensure that the facility is a safe and secure environment for employees and the local community.

Apothca's state-of-the-art security system consists of perimeter windows, as well as duress, panic, and holdup alarms connected to local law enforcement for efficient notification and response in the event of a security threat. The system also includes a failure notification system that will immediately alert the executive management team if a system failure occurs.

A redundant alarm system has been installed to ensure that active alarms remain operational if the primary system is compromised.

Interior and exterior HD video surveillance of all areas that contain marijuana, entrances, exits, and parking lots are operational 24/7 and available to the local Police Departments. These surveillance cameras remain operational even in the event of a power outage.

The exterior of the dispensary and surrounding area will be sufficiently lit and foliage will be minimized to ensure clear visibility of the area at all times.

Only Apothca's registered agents and other authorized visitors (e.g. contractors, vendors) will be allowed access to any facility, and a visitor log has been, and will continue to be, maintained in perpetuity.

All agents and visitors are required to visibly display an ID badge, and Apothca maintains a

current list of individuals with access.

On-site consumption of marijuana by Apothca's employees and visitors will be prohibited.

Apothca will have a security personnel on-site during business hours.

2.4 Benefits to the Municipality

Apothca looks forward to working cooperatively with all the municipalities in which it is operating, including Fitchburg, Lynn, Arlington, and Boston. All the municipalities approved the 2016 Ballot Question 4 legalizing adult use marijuana to ensure that Apothca operates as a responsible, contributing member of each community. Apothca anticipates establishing mutually beneficial relationships with the municipalities in exchange for permitting Apothca to site and operate its facilities. The municipalities stand to benefit in various ways, including but not limited to the following:

- **Jobs**
 - The Fitchburg Facility will add over 40 full-time jobs, in addition to hiring qualified, local contractors and vendors.
 - Each Retail location will add over 20 full and part-time jobs
- **Monetary Benefits**
 - A Host Community Agreement with significant monetary donations would provide each municipality with additional financial benefits beyond local property taxes.
- **Access to Quality Product**
 - Apothca will allow qualified patients, caregivers, and consumers in the Commonwealth to have access to high quality marijuana and marijuana products that are tested for cannabinoid content and contaminants
- **Control**
 - In addition to the Medical Use of Marijuana Program and the Commission, the municipality's Police Department and other municipal departments will have oversight over Apothca's security systems and processes.
- **Responsibility**
 - Apothca is comprised of experienced cultivators and professionals who have been thoroughly background checked by the Medical Use of Marijuana Program and will be thoroughly background checked and scrutinized by the Commission.

3. MARKET RESEARCH

3.1 Industry

Apothca's proposed Fitchburg Facility is located in Fitchburg, MA with parts of the property in Westminister, MA. Surrounding areas include Westminister, Ashburnham, Ashby, Townsend, Lunenburg and Leominster.

Apothca's Lynn RMD is located in Lynn, MA. Surrounding areas include Revere, Saugus, Swampscott, and Peabody.

Apothca's Arlington RMD is located in Arlington, MA. Surrounding areas include Cambridge, Somerville, Medford, Belmont, and Lexington.

Apothca's Boston RMD is located in the Jamaica Plain neighborhood in Boston, MA. Surrounding areas include Forest Hills, Woodbourne, Centre-South, Roslindale, Franklin Field North, Franklin Field South, South Brookline, Wellington Hill, Mattapan, and Roxbury.

3.2 Customers

In Massachusetts, sales are expected to increase from \$106 million in 2017 to \$457 million in 2018, and eventually to \$1.4 billion in 2025, according to New Frontier Data.

3.3 Competitors

Apothca's competitors include all currently open RMDs in the greater Boston area including, but not limited to, Alternative Therapies Group, Inc, Revolutionary Clinics, Sira Naturals, Inc, Healthy Pharms, Inc, Patriot Care, Corp, New England Treatment Access, LLC, and Garden Remedies, Inc.

3.4 Competitive Advantage

In every business, there is competition, however, the retail cannabis industry is known to be highly competitive. Apothca possesses several strengths which will allow it to stand apart from the competition. The industry is rapidly growing, and customers are scrutinizing the quality of cannabis dispensed, the service offered, the location of the dispensary, discounts offered for the products, and to some extent, the branding of the business.

Apothca's competitive advantages over their competition include:

1. A highly experienced team of successful operators including, but not limited to:
 - a. Rachmil "Roma" Lekach, Chairman of the Board of Directors - Roma Lekach has had a prolific career with a focus on retail, manufacturing, and distribution. Roma is the co-founder of Perfumania, growing it to be the leading specialty fragrance retailer with over 300 stores in 30 states. In 2001, the Lekach family sold controlling interest in Perfumania, which was publicly traded on the NASDAQ.
 - b. Joseph Lekach, Chief Executive Officer and Chief Operating Officer - Joseph Lekach received his degree from Babson College in Wellesley, MA. Upon finishing school, Joseph began a business with his brother manufacturing and selling Dream Water (drinkdreamwater.com), a 2.5oz liquid dietary supplement that helps you relax and fall asleep. Joseph was responsible for the distribution of

Dream Water and grew the brand into the best-selling sleep shot in the US sold in over 35,000 stores including Walgreens, CVS, Stop & Shop, Shaws, Hudson News, Amazon, and many more. Dream Water was sold to HarvestOne, a publicly traded Canadian medical marijuana company trading on the TSXv in 2018.

- c. Andrew Mark Young, Chief Financial Officer and Member of the Board of Directors - Mark is an established financial officer who previously initiated and implemented all infrastructure systems and processes to develop New Wave Fragrances, LLC, a company that was founded in 2007 and grew to annual revenues of approximating \$140 million by 2009. Young negotiated and executed a sale of the Company in 2012. Prior to New Wave, Mark was the CFO of Perfumania where he brought the company from a \$13 million loss to a \$14 million net profit in his last two fiscal years at the helm.
- d. Rabbi Moshe Yehuda Bleich, Member of the Board of Directors - Moshe studied in Rabbinical schools in London, England from 1992-1994 and in Jerusalem from 1994-1995. Moshe also was the founder of the Jewish Community Center in Kremenchug, Ukraine which he ran from 1995-1996. Moshe then continued his Rabbinical education in New York, New York from 1996-1997 and then taught Judaic Studies in Brooklyn, NY from 1998-2000. He went on to found the Wellesley-Weston Chabad Center in 2000 with a goal of serving the Jewish communities of Wellesley, Weston, as well as the surrounding towns and college communities.
- e. Corey Cutler, Member of the Board of Directors - For more than 30 years, Corey Cutler has grown and developed businesses in the fields of law, real estate development, property management, and sales and distribution of construction materials. In addition to his long-standing membership in the Bar of the Commonwealth of Massachusetts, Mr. Cutler is a licensed real estate broker with extensive experience representing buyers and sellers of real estate and managing real estate and construction projects. Mr. Cutler's success in the fields of law, real estate, and construction is the product of a diverse and well-developed skill set, particularly in the areas of negotiation and strategic planning.

With this highly experienced, professional, and successful team, which has covered all operational activities, Apothca is currently engaged in such as retail operations, manufacturing operations, distribution operations, and cultivation operations. Thus, Apothca is uniquely qualified to be successful in achieving its Mission.

3.5 Regulations

Apothca is a registered RMD with a Final Registration for its Fitchburg Facilities and operates in full compliance with c. 369 2012, "An Act for the Humanitarian Medical Use of Marijuana."

Apothca plans to also become a Marijuana Establishment, consistent with the objectives of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000.

Apothca is registered to do business in the Commonwealth as a domestic non-profit business corporation or another domestic business entity in compliance with 935 CMR 500.000 and maintains the corporation in good standing with the Massachusetts Secretary of the Commonwealth and the Department of Revenue.

Apothca will apply for all state and local permits and approvals required to renovate and operate the facility.

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

Apothca's Fitchburg Facility will cultivate marijuana, manufacture marijuana products, transport marijuana products, and conduct research and development.

Apothca's Lynn location currently operates as both a MTC and a Marijuana Retailer Establishment.

Apothca currently sells medical marijuana at its Water Street location in Arlington and intends to co-locate medical and adult-use marijuana sales at its proposed Massachusetts Avenue location at such a time that Apothca moves its RMD to co-locate it with its new proposed location in Arlington.

4. PRODUCT / SERVICE

4.1 Product & Service

Apothca has strict and thorough standard operating policies (“**SOP**”) for its various operations. Said SOPs will be available to be reviewed by the staff at the Commission and the government officials, police, and fire officials in each of the municipalities within which Apothca operates.

The core products Apothca will produce, distribute, and retail include, but are not limited to, smokable cannabis with varying levels of THC and CBD, ingestible infused products, extracts, oils, tinctures, lotions and topicals, salves, capsules, vaporizing cartridges, beverages, and shots.

4.2 Pricing Structure

Apothca pricing structure will vary based on market conditions. Apothca plans to produce products and medicine of superior quality and will price its products accordingly.

4.3 Intellectual Property Rights

Apothca has entered into trademark licensing agreements with Artcan Licensing, LLC for products, designs, formulas, and experiences for the brand Apothca™ and various brands under the holding company of TreHoldco, a prolific and successful product manufacturing company in the state of Washington.

4.4 Research & Development

Apothca research and development plans are significant. Within the Fitchburg Facility, one of the former owners, Bayer Pharmaceuticals, left two operational laboratories which requires minimal servicing to bring back to operational status.

Internally, Apothca plans to use the equipment in the laboratories to test propagation through tissue cultures. If successful, not only would Apothca generate an even more consistent product, but Apothca will also be able to further reduce its environmental impact as it would negate the need to have a “mother room” from which to create clones.

Externally, Apothca plans to launch a premiere accelerator/incubator program for which any entrepreneur or researcher can apply to participate in. Apothca plans to accept 5-10 applicants every six months, based on an application process. Apothca would be looking for entrepreneurs and researchers that want to advance the cannabis industry with concepts including, but not limited to, new products, new brands, new cultivation techniques, new extraction techniques, and whatever else the imagination of Massachusetts’ brilliant population can think of.

Apothca plans to create a process for minorities and people from lower socio-economic background to be given scholarships to join the program. Apothca is committed to empowering people from all walks to life to succeed and our incubator/accelerator program will

be built for that purpose.

Apart from access to our facilities, Apothca will provide those enrolled in our program with expert guidance, hands on training, raw materials, legal assistance, and other tools to succeed in the cannabis industry. Those enrolled in our program that successfully pass through our accelerator/incubator program will also be connected with a group of “angel investors” to be able to grow their new businesses as well as be able to implement their business concepts in Apothca's operations, whether it be techniques we can employ in our Fitchburg Facility, products we can distribute and sell through our retail facilities, or connections we can make to establish the businesses in other jurisdictions.

5. MARKETING & SALES

5.1 Growth Strategy

Apothca's plan to grow the company includes:

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

5.2 Communication

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

All marketing, advertising and branding produced by or on behalf of Apothca shall include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a $\frac{1}{2}$)(xxvi): "This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA."

Apothca will communicate with our customers by using:

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

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

5.3 Sales

Apothca will sell its product and service by separately engaging customers and patients with

knowledgeable in-store personnel.

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

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

5.4 Logo

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

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

An image of the logo can be found below:



6. FINANCIAL PROJECTIONS

| Fiscal Year | FIRST FULL FISCAL YEAR PROJECTIONS | SECOND FULL FISCAL YEAR PROJECTIONS | THIRD FULL FISCAL YEAR PROJECTIONS |
|--|---------------------------------------|--|---------------------------------------|
| | 2019 | 2020 | 2021 |
| Projected Revenue | \$ 14,847,805 | \$ 23,581,809 | \$ 28,769,807 |
| Projected Expenses | \$ 12,318,459 | \$ 19,564,611 | \$ 23,868,825 |
| VARIANCE: | \$ 2,529,347 | \$ 4,017,198 | \$ 4,900,981 |
| Number of unique customers for the year | 3,400 | 5,400 | 6,588 |
| Number of customer visits for the year | 58,752 | 93,312 | 113,84 |
| Projected % of customer growth rate annually | --- | 59% | 22% |
| Estimated purchased ounces per visit | .702 | .702 | .702 |
| Estimated cost per ounce | \$ 360 | \$ 360 | \$ 360 |
| Total FTEs in staffing | 62 | 68 | 68 |
| Total marijuana inventory for the year (in lbs.) | 2,700 | 4,200 | 5,100 |
| Total marijuana sold for the year (in lbs.) | 2,578 | 4,094 | 4,995 |
| Total marijuana left for roll over (in lbs.) | 122 | 106 | 105 |

6.1 Financial Assumptions

See the above chart

6.2 Profit & Loss

See the above chart

6.3 Cash Flow

Apothca estimates that the VARIANCE listed in the above chart, which includes tax liabilities, is a proper representation of Apothca's annual net cash flow

7. TEAM

7.1 General

Apothca has put together a team to implement the operations of the Marijuana Establishment. Apothca intends to create over 100 full-time staff positions within the first three years of operations across all the municipalities it operates within including Fitchburg, Lynn, Arlington, and Boston.

No individual on the Apothca team is a controlling person over more than three licenses in a particular class of license.

7.2 Founders

The Founders of Apothca, who remain affiliated with Apothca, have been previously described and consist of: Joseph Lekach, Rachmil Lekach, Rabbi Moshe Bleich, and Andrew Mark Young.

7.3 Executive Management Team

As previously detailed, Joseph Lekach serves as Apothca's Chief Executive Officer and Chief Operating Officer and Andrew Mark Young serves as Apothca's Chief Financial Officer.

7.4 Director of Security & Director of Cultivation

Byron Staton serves as Apothca's Director of Cultivation

Director of Cultivation: The Director of Cultivation is responsible for all daily operations and maintenance of the Cultivation Facility. The Director of Cultivation will:

- Be responsible for implementing policies within the Cultivation Facility.
- Coordinate space assignments.
- Receive and review work requests.
- Coordinate repairs and maintenance.
- Be responsible for supervision and training of agents.
- Provide mandatory training for new agents.
- Maintain a record of space allocations.
- Work with Greenhouse Technicians to promote successful operations in the Cultivation Facility.
- Program and monitor Environmental Control System (DDC).
- Maintain a database of environmental controls and conditions.
- Adjust DDC for optimum efficiency of operation.
- Provide pesticide recommendations and ensure Integrated Pest Management (IPM) Program is sufficient.

Currently, Apothca contracts with DGA Security and Wayne Alarm for all of the company's security system needs.

8. FINAL REMARKS

As a currently operating RMD and ME with RMD Priority Applicant Status, Apothca has the experience and know-how to safely and efficiently serve customers and patients with high quality, consistent, laboratory-tested medical grade cannabis and derivatives. By expanding operations to include adult-use products, Apothca hopes to bring its high quality standards to adult-use Consumers to provide them with a safe and clean community environment. To accomplish this, Apothca will leverage and expand its existing RMD infrastructure while maintaining its committed services to existing and future patients and their caregivers. Further, Apothca will leverage existing protocols and standard operating procedures to control, review, test, and track inventory, consistent with regulations set forth by the Commission. Apothca's state-of-the-art security systems and contracted professional security and alarm companies, along with other comprehensive security measures will also help ensure a safe and protected environment for both Consumers and staff and will help deter and prevent diversion.

In Massachusetts, cannabis-related sales are expected to increase from \$106 million in 2017 to \$457 millions in 2018, and eventually to \$1.4 billion in 2025. Apothca is prepared to position itself well in this market and contribute to this growth through a highly experienced team of successful operators working under an established framework of high quality standard operating procedures, research and development plans, and growth strategies. In doing so, Apothca looks forward to working cooperatively with all the municipalities in which it is operating to help spread the benefits this market will yield.

PLAN FOR OBTAINING LIABILITY INSURANCE

Apothca, Inc. (“Apothca”) has obtained general liability insurance coverage for its Medical Marijuana Treatment Center (“MMTC”) through Hub International Northwest, LLC and will maintain general liability insurance coverage for its adult-use activities for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually and product liability coverage for no less than \$1,000,000 per occurrence & \$2,000,000 in aggregate annually. The policy deductible will be no higher than \$5,000 per occurrence. Apothca will consider additional coverage based on availability and cost-benefit analysis.

If adequate coverage is determined to be unavailable at a reasonable rate, Apothca will place in escrow at least \$250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. Apothca will keep reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

APOTHCA, INC.

DIVERSITY PLAN

Overview

Apothca, Inc. (“Apothca”) is dedicated to promoting equity in its operations for diverse populations, which the Commission has identified as the following:

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

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

Goals

In order for Apothca to promote equity for the above-listed groups in its operations, Apothca has established the following goal:

- Increasing the number of individuals falling into the above-listed demographics working at Apothca and ensuring that at least 30% of Apothca’s agents are from the above-listed populations.²

Programs

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

- Hosting at least one (1) career fair annually in underrepresented and minority communities; and
- Advertising employment opportunities (as they become available, but not less than once annually) in diverse publications, job boards, or other media (such as diversityjobs.com, El Mundo, El Planeta, and World Journal).

Measurements

The Chief Operating Officer will administer the Plan and will be responsible for developing measurable outcomes to ensure Apothca continues to meet its commitments. Such measurable outcomes, in accordance with Apothca’s goals and programs described above, include:

- The number of and location of any career fairs that Apothca participates in, including documentation of all resumes received as a result of such career fairs;
- The number of individuals falling into the above-listed demographics hired and retained for a period of at least six months with the goal that at least 30% of Apothca’s agents are from the above-listed populations;

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

² In conjunction with Apothca’s hiring commitments provided in its Plan for Positive Impact, Apothca will ensure that at least 50% of its agents are from diverse populations or past or present residents of Fitchburg, Lynn, or other areas of disproportionate impact.

APOTHCA, INC.

- The number of employment opportunities advertised in diverse publications, job boards, or other media, including documentation of all resumes received as a result of such advertisements;
- The number of individuals falling into the above-listed demographics hired and retained for a period of at least six months as a result of the employment opportunities advertised in diverse publications, job boards or other media;

Beginning upon the Commission's approval of this amended Plan, Apothca will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The Chief Operating Officer will review and evaluate Apothca's measurable outcomes no less than twice annually to ensure that Apothca is meeting its commitments. Apothca is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

Acknowledgements

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

PLAN FOR SEPARATING RECREATIONAL FROM MEDICAL OPERATIONS

Apothca, Inc. (“Apothca”) has developed plans and procedures to ensure virtual and physical separation between medical and adult use marijuana operations in accordance with 935 CMR 502.000.

Prior to the point of sale or at the point of sale, Apothca will designate whether marijuana and/or Marijuana Products are intended for sale for adult use or medical use through Metrc. All marijuana and Marijuana Products will be transferred to the appropriate license within Metrc prior to sale. After the point of sale, Apothca will reconcile that inventory in Metrc.

In compliance with 935 CMR 502.140, Apothca will ensure that registered patients have access to a sufficient quantity and variety of medical marijuana and marijuana products. For the first six (6) months of operations, 35% of Apothca’s marijuana product inventory will be marked for medical use and reserved for registered patients. Thereafter, Apothca will maintain a quantity and variety of medical marijuana products for registered patients that is sufficient to meet the demand indicated by an analysis of sales data collected during the preceding six (6) months. Marijuana products reserved for patient supply will, unless unreasonably impracticable, reflect the actual types and strains of marijuana products documented during the previous six (6) months. If a substitution must be made, the substitution will reflect the type and strain no longer available as closely as possible.

On a quarterly basis, Apothca will submit to the Commission an inventory plan to reserve a sufficient quantity and variety of medical marijuana and Marijuana products for registered patients, based on reasonably anticipated patient needs as documented by sales records over the preceding six (6) months. On each occasion that the supply of any product within the reserved patient supply is exhausted and a reasonable substitution cannot be made, Apothca will submit a report to the Commission. Marijuana products reserved for patient supply will be either: (1) maintained on-site at Apothca’s retailer or easily accessible at another Apothca location and transferable to the retailer location within 48 hours of notification that the on-site supply has been exhausted. Apothca will perform audits of patient supply available on a weekly basis and retain those records for a period of six (6) months.

In addition to virtual separation, Apothca will provide for physical separation between the medical and adult use sales areas. A temporary or semi-permanent physical barrier, such as a stanchion or other divider, will be installed to create separate, clearly marked lines for patients/caregivers and adult-use consumers. Trained marijuana establishment agents will verify the age of all individuals, as well the validity of any Medical Use of Marijuana Program ID Cards, upon entry to the facility and direct them to the appropriate queue. Apothca’s agents will prioritize patient and caregiver identification verification and physical entry into the retail area.

Access to the adult-use marijuana queue will be limited to individuals 21 years of age or older, regardless if the individual is registered as a patient/caregiver. Registered patients under the age of 21 will only have access to the medical marijuana queue. A registered patient/caregiver 21 years of age or older will be permitted to access either queue and will not be limited only to the medical marijuana queue, so long as the transaction can be recorded in accordance with 935 CMR 501.105.

Apothca will also provide an enclosed patient consultation area that is separate from the sales floor to allow privacy and for confidential visual and auditory consultation. The patient consultation area will have signage stating “Consultation Area” and will be accessible by patients and caregivers without having to traverse a Limited Access area.

Apothca will also maintain separate financial records for adult-use products and medical products to ensure compliance with the applicable tax laws.

PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

Pursuant to 935 CMR 500.050(8)(b), Apothca, Inc. (“Apothca”) will only be accessible to consumers 21 years of age or older with a verified and valid government-issued photo ID. Upon entry into the premises of the marijuana establishment by an individual, an Apothca agent will immediately inspect the individual’s proof of identification and determine the individual’s age, in accordance with 935 CMR 500.140(2).

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

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

QUALITY CONTROL AND TESTING

Quality Control

Apothca, Inc. (“Apothca”) will comply with the following sanitary requirements:

1. Any Apothca agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any Apothca agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
 - a. Maintaining adequate personal cleanliness; and
 - b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. Apothca’s hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in Apothca’s production areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. Apothca’s facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Apothca will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. Apothca’s floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. Apothca’s facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Apothca’s buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. Apothca will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;

10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items will not be stored in an area containing products used in the cultivation of marijuana. Apothca acknowledges and understands that the Commission may require Apothca to demonstrate the intended and actual use of any toxic items found on Apothca's premises;
11. Apothca will ensure that its water supply is sufficient for necessary operations, and that any private water source will be capable of providing a safe, potable, and adequate supply of water to meet Apothca's needs;
12. Apothca's plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and wastewater lines;
13. Apothca will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. Apothca will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. Apothca will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

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

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

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

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

Testing

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

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

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

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

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

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

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of Apothca's marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to Apothca for disposal or by the Independent Testing Laboratory disposing of it directly. All Single-servings of marijuana products will be tested for potency in accordance with 935 CMR 500.150(4)(a) and subject to a potency variance of no greater than plus/minus ten percent (+/- 10%). Any marijuana or marijuana products submitted for retesting prior to remediation will be submitted to an Independent Testing Laboratory other than the laboratory which provided the initial failed result. Marijuana submitted for retesting after documented remediation may be submitted to the same Independent Testing Laboratory that produced the initial failed testing result prior to remediation.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

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

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

Agent Personnel Records

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

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

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

After-Hours Contacts

Joseph Lekach || P: 305-741-6540 || E: joseph@artcangroup.com

Byron Staton || P: 425-772-2612 || E: bstaton@apothca.com

Andrew Young || P: 305-801-7948 || E: mark@artcangroup.com

Megan Hansen || P: 339-440-6339 || E: mhansen@apothca.com

Joseph Nicholson || P: 508-509-1971 || E: jnicholson@apothca.com

Business Hours

Monday: 7:00 a.m. - 7:00 p.m.

Tuesday: 7:00 a.m. - 7:00 p.m.

Wednesday: 7:00 a.m. - 7:00 p.m.

Thursday: 7:00 a.m. - 7:00 p.m.

Friday: 7:00 a.m. - 7:00 p.m.

Saturday: 7:00 a.m. - 7:00 p.m.

Sunday: 7:00 a.m. - 7:00 p.m.

Agent Background Checks

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

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

Personnel Policies and Training

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

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

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

RECORDKEEPING PROCEDURES

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

Recordkeeping

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

- Corporate Records: are defined as those records that require, at a minimum, annual reviews, updates, and renewals, including:
 - Insurance Coverage:
 - Directors & Officers Policy
 - Product Liability Policy
 - General Liability Policy
 - Umbrella Policy
 - Workers Compensation Policy
 - Employer Professional Liability Policy
 - Third-Party Laboratory Contracts
 - Commission Requirements:
 - Annual Agent Registration
 - Annual Marijuana Establishment Registration
 - Local Compliance:
 - Certificate of Occupancy
 - Special Permits
 - Variances
 - Site Plan Approvals
 - As-Built Drawings
 - Corporate Governance:
 - Annual Report
 - Secretary of Commonwealth Filings
- Business Records: Records that require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:
 - Assets and liabilities;
 - Monetary transactions;

- Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products;
- Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over Apothca.
- Personnel Records: At a minimum will include:
 - Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
 - A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with Apothca and will include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - Documentation of verification of references;
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - Documentation of periodic performance evaluations; and
 - A record of any disciplinary action taken.
 - Notice of completed responsible vendor and eight-hour related duty training.
 - Personnel policies and procedures; and
 - All background check reports obtained in accordance with [M.G.L c. 6 § 172, 935 CMR 500.029: Registration of Independent Testing Laboratory Agents], 935 CMR 500.030: Registration of Marijuana Establishment Agents 803 CMR 2.00: Criminal Offender Record Information (CORI).
- Handling and Testing of Marijuana Records
 - Apothca will maintain the results of all testing for a minimum of one (1) year.
- Inventory Records
 - The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Seed-to-Sale Tracking Records
 - Apothca will use seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements

specified by the Commission and 935 CMR 500.105(8)(e), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.

- Incident Reporting Records

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

- Visitor Records

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

- Waste Disposal Records

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

- Security Records

- A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
- Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a

request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.

- Recordings shall not be destroyed or altered and shall be retained as long as necessary if Apothca is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.
- Transportation Records
 - Apothca will retain all transportation manifests for a minimum of one (1) year and make them available to the Commission upon request.
- Agent Training Records
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).
- Responsible Vendor Training
 - Apothca shall maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.
- Closure
 - In the event Apothca closes, all records will be kept for at least two (2) years at Apothca's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, Apothca will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.
- Written Operating Policies and Procedures: Policies and Procedures related to Apothca's operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Policies and Procedures will include the following:
 - Security measures in compliance with 935 CMR 500.110;
 - Employee security policies, including personal safety and crime prevention techniques;
 - A description of Apothca's hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
 - Storage of marijuana in compliance with 935 CMR 500.105(11);
 - Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;

- Price list for Marijuana and Marijuana Products, and alternate price lists for patients with documented Verified Financial Hardship as defined in 501.002: *Definitions*, as required by 935 CMR 501.100(1)(f);
- Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
- Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- Alcohol, smoke, and drug-free workplace policies;
- A plan describing how confidential information will be maintained;
- Policy for the immediate dismissal of any dispensary agent who has:
 - Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission;
 - Engaged in unsafe practices with regard to Apothca operations, which will be reported to the Commission; or
 - Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
- A list of all board of directors, members, and executives of Apothca, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on Apothca's website.
- Policies and procedures for the handling of cash on Apothca premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- Policies and procedures for energy efficiency and conservation that will include:
 - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
 - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;

- Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
 - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
 - Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.
- Application Renewal Records
 - Apothca will keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Record-Retention

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

MAINTAINING OF FINANCIAL RECORDS

Apothca, Inc. (“Apothca”) operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission’s Adult Use of Marijuana regulations (935 CMR 500). Financial records maintenance measures include policies and procedures requiring that:

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

during the six (6) months immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10).

- Additional written business records will be kept, including, but not limited to, records of:
 - Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
 - Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
 - Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission's regulations.
- Application Renewal Records
 - Apothca will keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

QUALIFICATIONS AND TRAINING

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

Qualifications

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

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

Training

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

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

Apothca will also encourage administrative employees who do not handle or sell marijuana to take the “Responsible Vendor” program on a voluntary basis to help ensure compliance. Apothca’s records of Responsible Vendor Training Program compliance will be maintained for

at least four (4) years and made available during normal business hours for inspection by the Commission and any other applicable licensing authority on request.

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

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

APOTHCA, INC.

FITCHBURG PRODUCT MANUFACTURER ENERGY COMPLIANCE PLAN

Apothca, Inc. (“Apothca”) will ensure the Fitchburg Product Manufacturer facility remains in compliance with the energy efficiency and conservation regulations codified in 935 CMR 500.105(1)(q) and 500.105(15).

Potential Energy-Use Reduction Opportunities

Apothca utilizes the following for energy-use reduction and implementation.

1. LED lighting
2. Translucent windows to allow for natural light
3. A programmable thermostat
4. An energy efficient generator.

As the need and opportunity for facility upgrades and maintenance arise in the future, Apothca will continue to evaluate energy-use reduction opportunities.

Renewable Energy Generation Opportunities

Apothca will continue to evaluate opportunities for renewable energy generation.

Strategies to Reduce Electric Demand

Apothca is utilizes the following strategies to reduce electric demand.

1. LED lighting that is set on a motion sensor.
2. Translucent windows to allow for natural light to assist with facility lighting.
3. A programmable thermostat.

As the need and opportunity for facility upgrades and maintenance arise in the future, Apothca will continue to evaluate strategies to reduce electric demand.

Opportunities for Engagement with Energy Efficiency Programs

Apothca will continue to evaluate its options for engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, s. 21, or through municipal lighting plants.

PRODUCT MANUFACTURING SAFETY PLAN

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

Agent Hygiene Practices

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

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

Food Material Practices

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

Food Contact Surface Sanitation Practices

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

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

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

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

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

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

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

Training

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

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

Cleanliness & Sanitation Training:

Apothca will combine its existing successful agent training program, supplemented with Commission rules and cannabis specific training to provide exhaustive training curricula to all agents. Apothca's training will include USDA Good Handling Practices and Quality Systems, FDA Current Good Manufacturing Practices, and sickness or illness policies. Agents who handle cannabis will receive hygiene training with specific attention to preventing microbial contamination. All employees will receive, at a minimum, the following quality assurance and contamination prevention training:

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

Apothca Lab and Production Agent Health and Safety Program

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

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

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

When selling or otherwise transferring marijuana to another marijuana establishment Apothca will provide documentation of its compliance with the testing requirements of 935 CMR 500.160: *Testing of Marijuana and Marijuana Products*, and standards established by the Commission for the conditions, including time and temperature controls, necessary to protect marijuana products against physical, chemical, and microbial contamination as well as against deterioration of finished products during storage and transportation.