



Massachusetts Cannabis Control Commission

Marijuana Product Manufacturer

General Information:

License Number: MP281446
Original Issued Date: 03/25/2019
Issued Date: 04/16/2021
Expiration Date: 04/17/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Cape Cod Grow Lab, LLC

Phone Number: 508-348-0065
Email Address: art@aabuildingremodeling.com

Business Address 1: 1399 Freemans Way
Business City: Brewster
Business State: MA
Business Address 2:
Business Zip Code: 02631
Mailing Address 1: 1399 Freemans Way
Mailing City: Brewster
Mailing State: MA
Mailing Address 2:
Mailing Zip Code: 02631

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

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

RMD INFORMATION

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

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 45
Percentage Of Control: 45
Role: Owner / Partner
Other Role: President

First Name: Chris Last Name: Dias Suffix:

Gender: Male User Defined Gender:

What is this person's race or ethnicity?: Decline to Answer

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 45 Percentage Of Control: 45

Role: Manager Other Role: Vice President

First Name: Artak Last Name: Sahakyan Suffix:

Gender: Male User Defined Gender:

What is this person's race or ethnicity?: Some Other Race or Ethnicity

Specify Race or Ethnicity: Armenian

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 10 Percentage Of Control: 10

Role: Manager Other Role:

First Name: Joshua Last Name: Flanders Suffix:

Gender: Male User Defined Gender:

What is this person's race or ethnicity?: Decline to Answer

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Joshua Last Name: Flanders Suffix:

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$472025 Percentage of Initial Capital: 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

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: Artak Owner Last Name: Sahakyan Owner Suffix:

Entity Legal Name: Sevan Bakery Entity DBA:

Entity Description: Bakery

Entity Phone: Entity Email: Entity Website:

000-000-0000 info@sevanbakery.com

Entity Address 1: 319 Apache Trail Entity Address 2:

Entity City: North York Entity State: Outside US Entity Zip Code: M2H 2W6 Entity Country: Canada

Entity Mailing Address 1: N/A Entity Mailing Address 2:

Entity Mailing City: Toronto Entity Mailing State: Outside US Entity Mailing Zip Code: Entity Mailing Country:

Date generated: 04/28/2021

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 1399 Freemans Way

Establishment Address 2:

Establishment City: Brewster

Establishment Zip Code: 02631

Approximate square footage of the Establishment: 9999

How many abutters does this property have?: 8

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

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	7.25.18 - CCGL - Host Brewster Certification Form.jpg	jpeg	5b58bbc19aeb1f34795457db	07/25/2018
Community Outreach Meeting Documentation	CCGL_Community_Presentation.pdf	pdf	5b58bbe75db774345fa89327	07/25/2018
Community Outreach Meeting Documentation	Community Outreach Meeting Notices.pdf	pdf	5b58bbf14ddf463465016ee0	07/25/2018
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant With Local Zoning.pdf	pdf	5b58bbf964718b346fe26dda	07/25/2018
Community Outreach Meeting Documentation	Community Outreach Meeting Documentation (Updated).pdf	pdf	5bd32809813a010d917ab90f	10/26/2018

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.: \$1

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact (Updated).pdf	pdf	5bd328324088250d697fc267	10/26/2018

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role:

Other Role:

First Name: Christopher

Last Name: Dias Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: **Other Role:**
First Name: Artak **Last Name:** Sahakyan **Suffix:**
RMD Association: Not associated with an RMD
Background Question: yes

Individual Background Information 3

Role: **Other Role:**
First Name: Joshua **Last Name:** Flanders **Suffix:**
RMD Association: Not associated with an RMD
Background Question: yes

ENTITY BACKGROUND CHECK INFORMATION
 No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	CCGL_LLC_ArtofOrg_filed.pdf	pdf	5b58ddba9aeb1f347954581a	07/25/2018
Secretary of Commonwealth - Certificate of Good Standing	CCGL_MA_CertofGS_201804262018.pdf	pdf	5b58dddaaec9503483dd68d0	07/25/2018
Department of Revenue - Certificate of Good standing	IMG_5548 (2).JPG	jpeg	5b58ddf7065a6d348d6fbfc2	07/25/2018
Bylaws	CCGL_OpK_v2_clean.docx (1).pdf	pdf	5b58dfdf065a6d348d6fbfca	07/25/2018

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	Secretary of Commonwealth_CCGL_Cert of Good Standing.pdf	pdf	5e2a3b03fe55e40432f6cc0d	01/23/2020
Department of Revenue - Certificate of Good standing	Mass_DOR_CCGL_Certificate of Good Standing.pdf	pdf	5e2a3b1269dc9d0456db526e	01/23/2020
Department of Unemployment Assistance - Certificate of Good standing	Mass_UA_Cert of Good Standing_CCGL.pdf	pdf	5e2a3b29fe55e40432f6cc11	01/23/2020
Department of Revenue - Certificate of Good standing	REN_2021_Cert of Good Standing_Dept of Revenue_CCGL_02.23.21.pdf	pdf	603d406a9a694b3583a717ad	03/01/2021
Department of Unemployment Assistance - Certificate of Good standing	REN_2021_Cert of Good Standing_Dept of Unemployment_02.02.21.pdf	pdf	603d406befe1e0359b95a23b	03/01/2021
Secretary of Commonwealth - Certificate of Good Standing	REN_Cert of Good Standing_Secretary of Commonwealth_CCGL_02.08.21.pdf	pdf	603d406db64912358e31246b	03/01/2021

Massachusetts Business Identification Number: 001323388
Doing-Business-As Name:
DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	CCGL Management and Pro Forma.pdf	pdf	5b8592deda72283955c61072	08/28/2018
Proposed Timeline	Timeline.pdf	pdf	5b859335cea8212d4c7b5927	08/28/2018
Plan for Liability Insurance	Screen Shot 2018-08-28 at 11.24.01 AM.png	png	5b8593525e9b3d2d528a7f0a	08/28/2018
Proposed Timeline	2_CCGL_Proposed Timeline_Amended_MPR243513.pdf	pdf	5e5985cd5a2369047f228f96	02/28/2020
Proposed Timeline	REN_2021_Updated Construction Timeline_CCGL.pdf	pdf	603d4087b3603835a49f2ab6	03/01/2021

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Method used to produce products	Method Used to Produce Products.pdf	pdf	5b58e3a78a93fd282f3e3456	07/25/2018
Sample of unique identifying marks used for branding	Unique Identifying Marks.pdf	pdf	5b58e4bcfbbc11284d02e882	07/25/2018
Separating recreational from medical operations, if applicable	Separating Medicinal and Recreational Products.pdf	pdf	5b58e51412ba8f281ff5231c	07/25/2018
Restricting Access to age 21 and older	Preventing Access by those Under 21.pdf	pdf	5b59da254ddf463465016f9a	07/26/2018
Prevention of diversion	Preventing Diversion.pdf	pdf	5b59da80cfd7f028435e2328	07/26/2018
Inventory procedures	Inventory Procedures.pdf	pdf	5b59dbd4cfd7f028435e232e	07/26/2018
Dispensing procedures	Dispensing Procedures.png	png	5b59ddd31ccce4282510a318	07/26/2018
Personnel policies including background checks	Personnel Policies.pdf	pdf	5b59deda1ccce4282510a31c	07/26/2018
Maintaining of financial records	Maintenance of Financial Records.pdf	pdf	5b59df9bcbfd7f028435e2334	07/26/2018
Personnel policies including background checks	Appendix.pdf	pdf	5b68614c5a6f093923e4edbb	08/06/2018
Types of products Manufactured.	Detailed Description of Products & Strains.pdf	pdf	5b69ed733f9f81395f134b70	08/07/2018
Transportation of marijuana	Transportation of Marijuana.pdf	pdf	5b69edfc89bc002d99189aa3	08/07/2018
Qualifications and training	Qualifications & Training.pdf	pdf	5b69eedf0d95792d85f41b6a	08/07/2018
Record Keeping procedures	Record-Keeping.pdf	pdf	5b69ef828d67cc394b81aa66	08/07/2018
Storage of marijuana	Storage.pdf	pdf	5b6af2c103a477392d0a219a	08/08/2018
Quality control and testing	Quality Control _ Testing Procedures (Updated).pdf	pdf	5bd32916e18b8a04881dc800	10/26/2018
Diversity plan	Diversity Plan (Updated).pdf	pdf	5bd329246427cd044e6275a8	10/26/2018
Security plan	CCGL Security Plan (Updated - Hours of Operation pg 25).pdf	pdf	5bd3293d2d1cf504966f20a9	10/26/2018
Types of products Manufactured.	Detailed Description of Products _ Strains (Updated).pdf	pdf	5bd32977d912bf0445fe4c32	10/26/2018

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: Due to the Covid-19 pandemic and ongoing build out of the facility, we have been unable to begin implementing the goals of our Positive Impact Plan as originally planned. As we are now continuing to make progress with the construction and build out we intend to begin implementing the goals outlined in our Positive Impact Plan to provide mentorship and business development strategies to cannabis entrepreneurs.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: Due to the Covid-19 pandemic and ongoing build out of the facility, we have been unable to begin implementing the goals of our Diversity Plan as originally planned. As we are now continuing to make progress with the construction and build out we intend to begin implementing the goals outlined in our Diversity Plan to acquire a diverse operational staff.

PRODUCT MANUFACTURER SPECIFIC REQUIREMENTS

Item 1

Label Picture:

Document Category	Document Name	Type	ID	Upload Date
	CCGL_License Renewal_Manufactured Product.pdf	pdf	5e2a3c7964339304b08fb9cd	01/23/2020

Name of Item: N/A

Item Type: Flower

Item Description: Cape Cod Grow Lab is not operational at this time. Once the facility construction is complete and operational we will provide the relevant product information manufactured at the facility to the state.

HOURS OF OPERATION

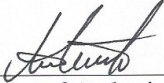
Monday From: 8:00 AM	Monday To: 7:00 PM
Tuesday From: 8:00 AM	Tuesday To: 7:00 PM
Wednesday From: 8:00 AM	Wednesday To: 7:00 PM
Thursday From: 8:00 AM	Thursday To: 7:00 PM
Friday From: 8:00 AM	Friday To: 7:00 PM
Saturday From: Closed	Saturday To: Closed
Sunday From: Closed	Sunday To: Closed

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

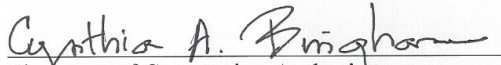
I, Antak Sahakyan, (*insert name*) certify as an authorized representative of Cape Cod Green Lab (*insert name of applicant*) that the applicant has executed a host community agreement with Town of Brewster (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on July 25 2018 (*insert date*).



Signature of Authorized Representative of Applicant

Host Community

I, CYNTHIA BINGHAM, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for TOWN OF BRUNSTEL (*insert name of host community*) to certify that the applicant and TOWN OF BRUNSTEL (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on July 25 2018 (*insert date*).



Signature of Contracting Authority or
Authorized Representative of Host Community

CAPE COD GROW LAB

COMMUNITY BENEFIT PUBLIC MEETING



BREWSTER, MA



MAY 1, 2018

WHO WE ARE

**CHRIS
DIAS**



Chris is a business owner and 46 year Cape Cod resident. He has run Specialty Builders' Supply from Brewster for over 17 years. The company he started alone now has 35 employees and an additional location on Martha's Vineyard where he was born. Chris lived in Brewster for 16 years and recently moved to Orleans with his wife and daughter.

**ARTAK
SAHAKYAN**



Artak is the owner of a successful home remodeling business in Chatham. He has been a resident of Massachusetts for over fifteen years. Artak is also heavily involved in the local community and recently organized an event to protect and promote International Human Rights through the Armenian Church of Cape Cod.

**JOSHUA M.
FLANDERS**



Joshua is the owner of Flanders and Crew Inc., a general contracting company he started over 30 years ago on the island of Martha's Vineyard. Joshua moved to the island in the 1980s and started building homes, and he has a successful business based on quality and integrity. Joshua sees this new business opportunity as a chance to work with educated, creative professionals with the common goal of creating a quality company.



Massachusetts recently passed regulations authorizing Recreational Marijuana and will be giving licenses to Establishments throughout the State. Recreational Marijuana is defined as the non-medical Adult-Use of Cannabis to adults 21 years and over.

MARIJUANA LEGALIZATION FACTS

- Since legalization, Colorado & Washington have not seen an increase in youth marijuana usage
- In 2016, Colorado's legal marijuana industry generated roughly \$200 million in taxes for the state
- States that have legalized have had 25% fewer opioid deaths

SOURCES:

Hasin, Deborah S. et al. "Medical marijuana laws and adolescent marijuana use in the USA from 1991 to 2014. *The Lancet Psychiatry* 2.7 (2015): 601-608).

Bachhuber MA, Saloner B, Cunningham CO, Barry CL. *JAMA Intern Med.* 2014;174(10):1668–1673.
doi:10.1001/jamainternmed.2014.4005

<https://jamanetwork.com/journals/jamainternalmedicine/fullarticle/1898878>

<https://www.colorado.gov/pacific/revenue/colorado-marijuana-tax-data>

THE CAPE COD GROW LAB: OVERVIEW



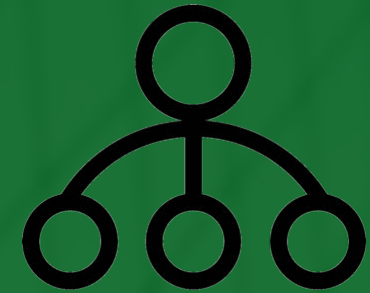
Cultivation

Cultivation is growing cannabis plants to maturity for harvesting.



Manufacturing

Manufacturing consists of extracting oils from cannabis plants.

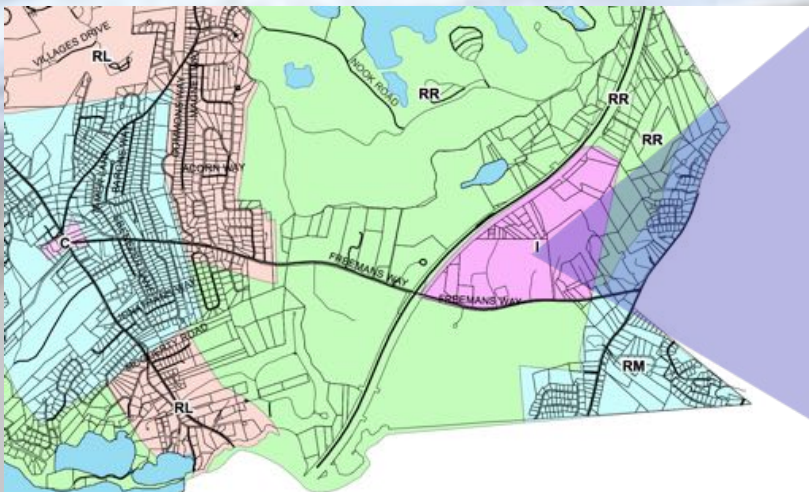


Transportation

The movement of cannabis product to licensed retailers.

LOCATION

1399 Freemans Way Brewster, MA 02631

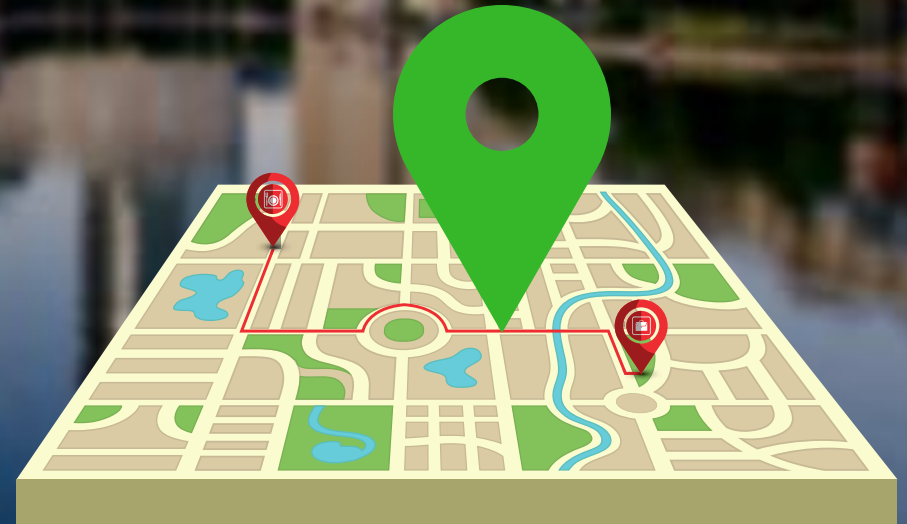


The business premises is located in an industrial zone. We will be building a 9,999 sq. ft. facility on the property.

SECURITY & LOCATION MAINTENANCE

The Cape Cod Grow Lab will maintain a secure business site. In order to do this we will take the following security measures:

- Limiting Access to Facility
- Utilizing Seed to Sale Track & Trace software
- Installing 360 Degree Video Surveillance Cameras & Alarm systems
- Using secure cash storage



PREVENTION OF ACCESS TO MINORS

Inventory Control /
Seed to Sale Track & Trace



Limited Access
Property



Labeling of Products



POSITIVE COMMUNITY IMPACT

Cape Cod Grow Lab will be respectful of its surrounding community. We will pledge 3% of gross receipts to the town per the Host Community Agreement and plan to support the Cape Cod Foundation.

3%



COMMITMENT TO ENVIRONMENTAL SUSTAINABILITY

Water Catchments

Minimal pesticides and only OMRI Certified products

Lighting >50 watts per sq. ft.



PREVENTING NUISANCE

No visible marijuana signs



Odor control



Not visible from road



Q & A

Questions?

A scenic view of a harbor filled with many sailboats and yachts, with buildings and greenery in the background. The water is blue, and the sky is clear. The foreground shows a grassy hillside with some bushes.

THANK YOU



COMMUNITY CONTACT:
CHRIS DIAS
(508) 221-7705

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, Arbak Sahakyan, (insert name) attest as an authorized representative of Cape Cod Growtals LLC (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 05/01/2018 (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 04/21/2018 (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 04/19/18 (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 04/19/18 + 04/24/18 (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.
- Community members were permitted to ask questions and receive answers from representatives of the Marijuana Establishment.

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for May 1st at 12 p.m. at 1822 Main Street, Brewster, MA. The proposed cultivation, manufacturing, and transportation site is anticipated to be located at 1399 Freemans Way, Brewster, MA. There will be an opportunity for the public to ask questions.

Attachment A

Published in Boston Globe
April 21, 2018

Manie Pollack, Secretary and CEO, MassDOT
Nathan L. Gulliver, Highway Administrator, MassDOT Highway Division
FRIDAY, APRIL 21, 2018

out new
car specials
over 100
dealers.

1.com

led by

urus

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for May 1st at 12 p.m. at 1822 Main Street, Brewster, MA. The proposed cultivation, manufacturing, and transportation site is anticipated to be located at 1399 Freemans Way, Brewster, MA. There will be an opportunity for the public to ask questions.

THE ANNUAL RETURN
THE WILLIAM F RAY
FOUNDATION for the
year ended Decem
2017 is available at
cipal office locate
Hunting Lane, Sher
01770 (617) 581
inspection during
business hours b
zen who request
180 days hereof.
Manager of the F
is WILLIAM F. RAY

Attachment B

NOTICE OF COMMUNITY OUTREACH MEETING Cape Cod Grow Lab, LLC

This communication serves as public notice that Cape Cod Grow Lab, LLC will hold a Community Outreach Meeting on **Tuesday, May 1, 2018** at the **Brewster Ladies' Library, 1822 Main Street, Brewster, MA 02631** between **12:00-1:30 PM** to discuss the proposed siting of an Adult-Use Marijuana Establishment in the Town of Brewster.

Cape Cod Grow Lab, LLC will apply for a licenses to operate Marijuana Cultivation, Manufacturing, and Transport operations. The facility will be located at **1399 Freemans Way, Brewster, MA 02631**. Pursuant to M.G.L. Title XV, Chapter 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.

We will also have a question and answer session included as part of the discussion. Members of the community are encouraged to participate and learn more about our 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 Town Clerk, the Planning Board, and Town Administrator of the Town of Brewster. 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.

Cape Cod Grow Lab, LLC

Chris Dias

Artak Sahakyan

Joshua Marston Flanders



Notice of Public Meeting - Marijuana Project - May 1, 2018 @ noon

Lynn St. Cyr <lstcyr@brewster-ma.gov>

Thu, Apr 19, 2018 at 2:34 PM

To: Lauren Estevez <lauren@margolinlawrence.com>, Colette Williams <cwilliams@brewster-ma.gov>

Cc: Eric Macomber <eric@margolinlawrence.com>, Sam Newmark <sam@margolinlawrence.com>

Attorney Estevez,

I am confirming receipt in the Planning Department of the Notice of Community Outreach Meeting. I do not need a copy mailed. Thank you.

Regards,

Lynn

Lynn M. St. Cyr

Senior Department Assistant

Planning Department

Brewster Town Offices

2198 Main Street

Brewster, MA 02631

T: 508-896-3701 x1233

F: 508-896-8089

From: Lauren Estevez [mailto:lauren@margolinlawrence.com]

Sent: Thursday, April 19, 2018 2:03 PM

To: Lynn St. Cyr <lstcyr@brewster-ma.gov>; Colette Williams <cwilliams@brewster-ma.gov>

Cc: Eric Macomber <eric@margolinlawrence.com>; Sam Newmark <sam@margolinlawrence.com>

Subject: Re: Notice of Public Meeting - Marijuana Project - May 1, 2018 @ noon

[Quoted text hidden]



Notice of Public Meeting - Marijuana Project - May 1, 2018 @ noon

Colette Williams <cwilliams@brewster-ma.gov>

Thu, Apr 19, 2018 at 3:05 PM

To: Lauren Estevez <lauren@margolinlawrence.com>, "Lynn St. Cyr" <lstcyr@brewster-ma.gov>

Cc: Eric Macomber <eric@margolinlawrence.com>, Sam Newmark <sam@margolinlawrence.com>

Good Afternoon,

Please accept this email as confirmation of receipt of your "Public Outreach Meeting" to be held in Brewster on May 1st. The email serves as adequate notice, no need to mail a hard copy.

Thank you,

Colette

Colette M. Williams

CMC/CMMC

Town Clerk

Brewster, MA

"The Secretary of the Commonwealth has determined that email is considered a public record."

From: Lauren Estevez [mailto:lauren@margolinlawrence.com]

Sent: Thursday, April 19, 2018 2:03 PM

To: Lynn St. Cyr <lstcyr@brewster-ma.gov>; Colette Williams <cwilliams@brewster-ma.gov>

Cc: Eric Macomber <eric@margolinlawrence.com>; Sam Newmark <sam@margolinlawrence.com>

Subject: Re: Notice of Public Meeting - Marijuana Project - May 1, 2018 @ noon

Hi Ms St Cyr and Ms Williams,

Please confirm receipt of the Notice and whether you will also need a mailing in order to consider the document filed with the Town and Planning Dept.

Thanks!
Lauren

NOTICE OF COMMUNITY OUTREACH MEETING Cape Cod Grow Lab, LLC

This communication serves as public notice that Cape Cod Grow Lab, LLC will hold a Community Outreach Meeting on **Tuesday, May 1, 2018** at the **Brewster Ladies' Library, 1822 Main Street, Brewster, MA 02631** between **12:00-1:30 PM** to discuss the proposed siting of an Adult-Use Marijuana Establishment in the Town of Brewster.

Cape Cod Grow Lab, LLC will apply for a licenses to operate Marijuana Cultivation, Manufacturing, and Transport operations. The facility will be located at **1399 Freemans Way, Brewster, MA 02631**. Pursuant to M.G.L. Title XV, Chapter 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.

We will also have a question and answer session included as part of the discussion. Members of the community are encouraged to participate and learn more about our 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 Town Clerk, the Planning Board, and Town Administrator of the Town of Brewster. 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.

Cape Cod Grow Lab, LLC

Chris Dias

Artak Sahakyan

Atul Salunke
Joel Winston Flanders

Plans for Compliance With Local Codes, Ordinances, and Bylaws

Cape Cod Grow Lab (“CCGL”) will apply for a Special Permit for marijuana activity with the Town of Brewster. The business will be in full compliance with all local codes, ordinances and bylaws regarding marijuana cultivation, manufacturing, and transportation. More detail on the property at 1399 Freemans Way and the specific plan for build out can be found in the Special Permit Application which will be submitted to the Town of Brewster for approval. We will also abide by the terms of the Host Community Agreement that we will execute with the town.

Industrial Zoning

We are in the industrial zone which is one of the permitted zones for a Recreational Marijuana Establishment (“RME”).

Operating Hours

We will comply with the operating hours set forth in the Brewster Recreational Cannabis Ordinance.

Avoiding Nuisances

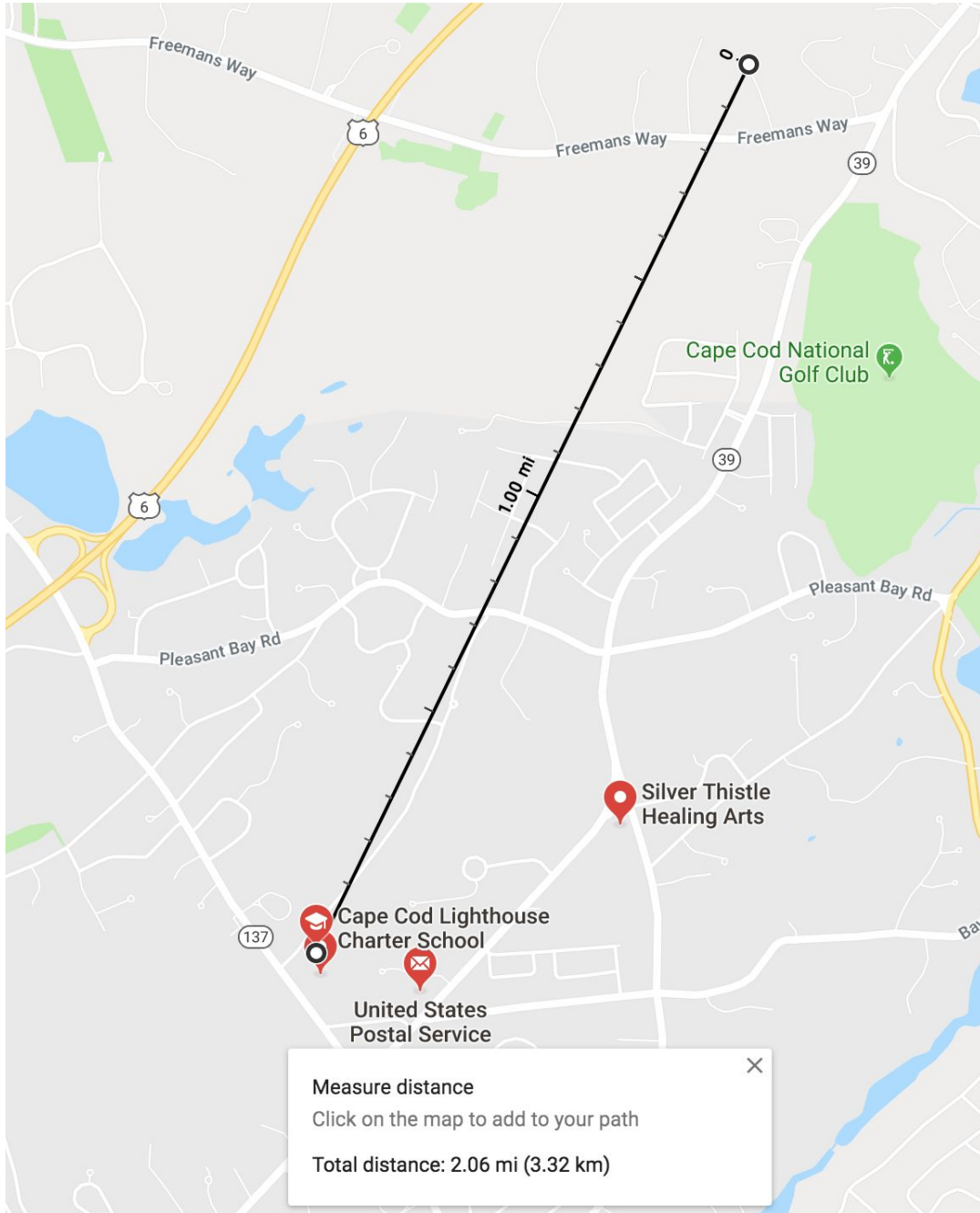
As discussed in detail in our Community Benefit Presentation, we will take measures to avoid nuisances in Brewster such as odor control, shielding any marijuana activities from public view on the road, limiting access to the facility so that no one who

is not an employee and no one who is a minor may enter, and implementing a robust Track & Trace system that prevents diversion of product. More detail on our operating procedures can be found in the Cultivation Plan.

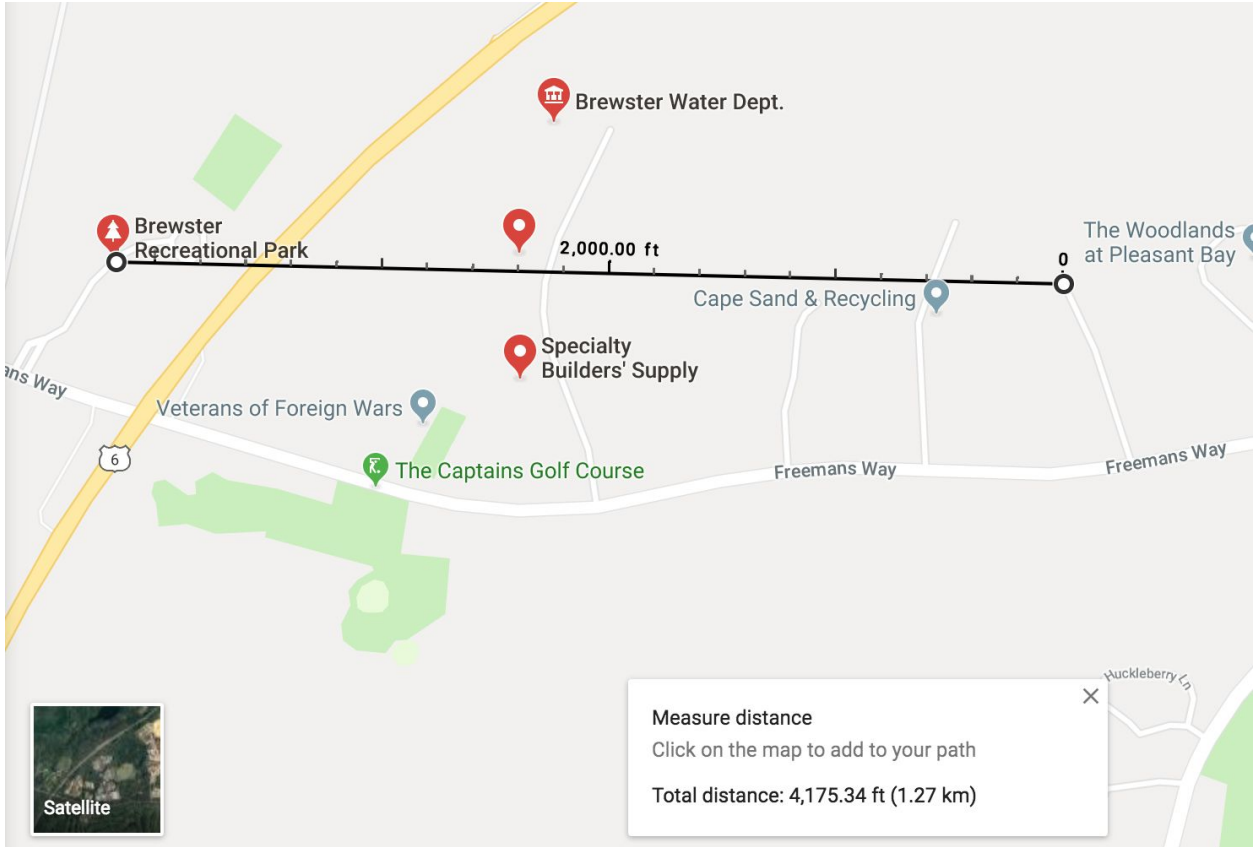
Buffer Zone

The proposed premises for Cape Cod Grow Lab, 1399 Freemans Way, is not located within 500 feet of a pre-existing public or private school providing education in kindergarten or any of grades one through 12.

The nearest school to the premises, Cape Cod Lighthouse Charter School, is located over 2 miles away:



Additionally, the nearest park to the premises, Brewster Recreational Park, is located over 4,000 feet away:





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, Abdul Salimyan, (insert name) attest as an authorized representative of Cape Cod Grow Lab LLC (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 05/01/2018 (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 04/21/2018 (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 04/19/18 (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 04/19/18 + 04/24/18 (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:
- The type(s) of Marijuana Establishment to be located at the proposed address;
 - Information adequate to demonstrate that the location will be maintained securely;
 - Steps to be taken by the Marijuana Establishment to prevent diversion to minors;
 - A plan by the Marijuana Establishment to positively impact the community; and
 - Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
- Community members were permitted to ask questions and receive answers from representatives of the Marijuana Establishment.

Your Future Legal Notices

These legal notices have been paid for and will run in the next 30 days

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for May 1st at 12 p.m. at 1822 Main Street, Brewster, MA. The proposed cultivation, manufacturing, and transportation site is anticipated to be located at 1399 Freemang Way, Brewster, MA. There will be an opportunity for the public to ask questions.

Legal Notice Number:

W00601890

Sat Apr 21, 2018

Boston Globe Legal Notices:

[View Details](#)

[Modify](#)

[Reschedule](#)

[Cancel](#)

[Reorder](#)

Order Number: **W0060189**

Order Status: **Approved**

Creation Date: **4/18/18 4:24 PM**

Last Modified: **4/18/18 5:17 PM**

By: **nswanton@globe.com**

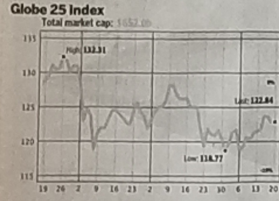
Attachment A

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THE BOSTON GLOBE

25

Index of publicly traded companies in Massachusetts

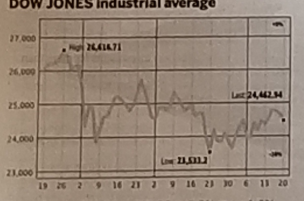


Yesterday 122.84 ▼ 0.01 ▼ 0.0% ▼ ytd 1.3%

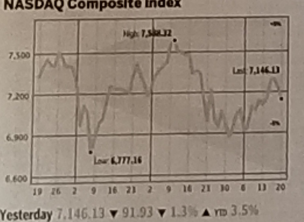
Table with 4 columns: Company Name, Price, Chg, % Chg, and Market Cap (\$M). Includes companies like General Electric, Thermo Fisher, Raytheon, and others.

Markets

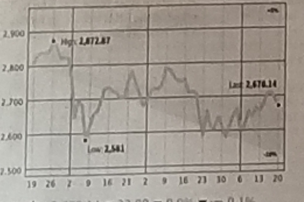
Tech stocks bring market down
A steep slide in technology companies weighed on US stocks Friday, pulling the market lower for the second day in a row.



Yesterday 24,462.94 ▼ 201.95 ▼ 0.8% ▼ ytd 1.0%



Yesterday 7,146.13 ▼ 91.93 ▼ 1.3% ▲ ytd 3.5%



Yesterday 2,670.14 ▼ 22.99 ▼ 0.9% ▼ ytd 0.1%

AT&T, Verizon face collision inquiry

Allegedly reduced ease of switching wireless carriers

By Cecilia Kang

WASHINGTON—The Justice Department has opened an antitrust investigation into potential coordination by AT&T, Verizon, and a telecommunications standards organization to hinder consumers from easily switching wireless carriers, according to six people with knowledge of the inquiry.

In February, the Justice Department issued demands to AT&T, Verizon, and the GSMA, a mobile industry standards-setting group, for information on potential collusion to thwart a technology known as eSIM, said two of the people, who spoke on the condition of anonymity because the details are confidential.

The eSIM technology lets people remotely switch wireless providers without having to insert a new SIM card into a device. AT&T and Verizon face accusations that they colluded with the GSMA to try to establish standards that would allow them to lock a device to their network even if it had eSIM technology.

The investigation was opened about five months ago after at least one device maker filed formal complaints with the Justice Department, two of the people said.

Representatives for the Justice Department, AT&T, Verizon, and the GSMA declined to comment.

At the heart of the investigation is whether the nation's biggest wireless carriers, working with the GSMA, secretly tried to influence mobile technology to unfairly maintain their dominance in a way that hurt competition and consumers and hindered innovation in the wider mobile industry.

Delrahim, to crack down on the opaque world of intellectual property, or IP, standards. He has said the Justice Department will scrutinize potential coordination in standards-setting organizations that can hurt competition.

In the context of antitrust and IP, we will be inclined to investigate and enforce when we see evidence of collusive conduct undertaken for the purpose of fixing prices, or excluding particular competitors or products," Delrahim said in a speech this month at a conference in Washington. He previously warned of the potential for "cartel-like behavior" by competitors that got together with standards-setting organizations.

At the same time, the Justice Department is suing AT&T to block its \$85.4 billion merger with Time Warner. Delrahim has said the deal will hurt competition and lead to higher prices for cable customers.

AT&T and Time Warner have strongly disputed the claims in a federal trial that is expected to end this month. Most mobile phones use SIM cards, which contain unique identifying information about a user and are inserted into the devices so the phones can function. People typically have to buy a new SIM card when changing carriers.

The eSIM technology, which was introduced in early 2016, is embedded in mobile phones and other devices so people do not need SIM cards anymore.

The eSIM technology is supported by gadget makers including Apple, Google, and Microsoft, as well as several wireless carriers globally and in the United States.

The Apple Watch 3, Google Pixel 2 smartphone, and Microsoft Surface all have eSIM abilities, for example. The technology would make it easier for people to use local carriers when traveling internationally and would free up storage space in devices to use for other technologies like bigger processors and batteries.

The push by the major carriers to restrict the flexibility of eSIM runs counter to a movement in which consumers were gaining more flexibility to move from carrier to carrier.

Jet engine maker wants more planes to get inspections

By Tom Krisher

ASSOCIATED PRESS

The manufacturer of the jet engine that New Spain is using in a deadly accident aboard a Southwest Airlines flight wants more jets to be inspected for potential problems.

A spokeswoman for CFM International says the company plans to issue a service bulletin Friday that would expand the number of engines to be checked beyond those in previous notifications.

At issue are the engine fan blades on Boeing 737s. The CFM56-7B engines are on about 1,000 "new generation" 737s in service in the United States and about 6,000 worldwide.

The National Transportation Safety Board believes one of the blades snapped on the Southwest flight Tuesday, hurling debris that broke a window and led to the death of a 43-year-old banking executive Jennifer Riordan of Albuquerque, N.M., who was sucked partway out of the plane.

The jet, which was headed from New York to Dallas, made an emergency landing in Philadelphia.



An investigator examined damage to the engine of a Southwest Airlines plane.

Meanwhile, Southwest is sending a letter of apology to 85,000 passengers and a \$1,000 travel voucher to passengers who were on the flight.

Chairman Gary Kelly says in the letter that the money is to help cover any "immediate financial needs."

Passenger Marty Martinez of Dallas says he has no immediate plan to cash the check. He wants to talk to a lawyer. Eric Zilbert of Davis, Calif., says that after consulting with an attorney, he will cash his.

A public memorial service for Riordan is set for Sunday in Albuquerque.

Massachusetts added 4,700 jobs in March

ASSOCIATED PRESS

State officials say the Massachusetts economy picked up an estimated 4,700 jobs in March while the unemployment rate held steady at 3.5 percent.

Massachusetts remained more than a half percentage point below the national jobless rate, which stood at 4.1 percent in March.

Rosalind Acosta, the state's Labor and Workforce Development secretary, said the unemployment rate has remained largely unchanged over the past six months, while the overall labor force expanded more than 20,000 jobs during that period.

The US Bureau of Labor Statistics estimating the state has added nearly 42,000 jobs over the past 12 months.

Takeda sweetens its offer for Shire

By Jonathan Saltzman

GLOBE STAFF

Takeda Pharmaceutical Co. of Japan made a fourth offer Friday to buy Shire PLC, raising its bid slightly to about \$62 billion, according to Shire, the second-largest biotech employer in Massachusetts.

Shire said its board was considering the offer and "will issue a further announcement in due course."

Takeda has made three offers to buy Shire since March 28, when the company said it was making a play for the Irish-based firm, which has most of its operations in Lexington. But Shire rejected all three. The last one totaled about \$61 billion.

Shire has more than 3,000 workers in Massachusetts and specializes in medicines for rare diseases, as well as the ADHD drug Adderall. The company's board said it rejected the third offer unanimously because it "continues to significantly undervalue the company and Shire's growth prospects and pipeline."

Jonathan Saltzman can be reached at jsaltzman@globe.com

Advertisement for massDOT (Massachusetts Department of Transportation) featuring project notices, legal notices, and contact information.

Advertisement for massDOT featuring project notices, legal notices, and contact information.

Attachment A

Published in Boston Globe
April 21, 2018

Manie Pollack, Secretary and CEO, MassDOT
than L. Gulliver, Highway Administrator, MassDOT Highway Division
FRIDAY, APRIL 21, 2018

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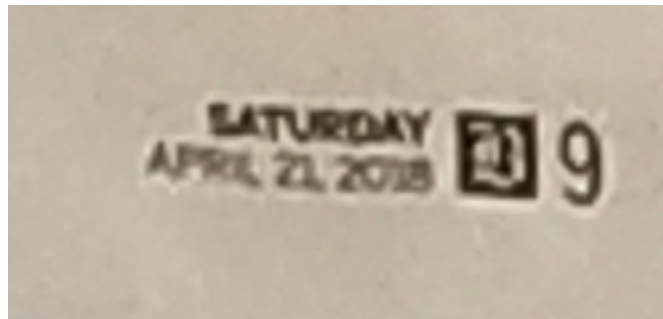
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THE ANNUAL RETURN
THE WILLIAM F RAY
DATION for the
year ended Decem
2017 is available at
cipal office locate
Hunting Lane, Sher
01770 (617) 581
inspection during
business hours b
zen who request
180 days hereof.
Manager of the F
is WILLIAM F RAY



Attachment B

NOTICE OF COMMUNITY OUTREACH MEETING Cape Cod Grow Lab, LLC

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Cape Cod Grow Lab, LLC

Chris Dias

Artak Sahakyan

Joshua Marston Flanders



Notice of Public Meeting - Marijuana Project - May 1, 2018 @ noon

Lynn St. Cyr <lstcyr@brewster-ma.gov>

Thu, Apr 19, 2018 at 2:34 PM

To: Lauren Estevez <lauren@margolinlawrence.com>, Colette Williams <cwilliams@brewster-ma.gov>

Cc: Eric Macomber <eric@margolinlawrence.com>, Sam Newmark <sam@margolinlawrence.com>

Attorney Estevez,

I am confirming receipt in the Planning Department of the Notice of Community Outreach Meeting. I do not need a copy mailed. Thank you.

Regards,

Lynn

Lynn M. St. Cyr

Senior Department Assistant

Planning Department

Brewster Town Offices

2198 Main Street

Brewster, MA 02631

T: 508-896-3701 x1233

F: 508-896-8089

From: Lauren Estevez [mailto:lauren@margolinlawrence.com]

Sent: Thursday, April 19, 2018 2:03 PM

To: Lynn St. Cyr <lstcyr@brewster-ma.gov>; Colette Williams <cwilliams@brewster-ma.gov>

Cc: Eric Macomber <eric@margolinlawrence.com>; Sam Newmark <sam@margolinlawrence.com>

Subject: Re: Notice of Public Meeting - Marijuana Project - May 1, 2018 @ noon

[Quoted text hidden]



Notice of Public Meeting - Marijuana Project - May 1, 2018 @ noon

Colette Williams <cwilliams@brewster-ma.gov>

Thu, Apr 19, 2018 at 3:05 PM

To: Lauren Estevez <lauren@margolinlawrence.com>, "Lynn St. Cyr" <lstcyr@brewster-ma.gov>

Cc: Eric Macomber <eric@margolinlawrence.com>, Sam Newmark <sam@margolinlawrence.com>

Good Afternoon,

Please accept this email as confirmation of receipt of your "Public Outreach Meeting" to be held in Brewster on May 1st. The email serves as adequate notice, no need to mail a hard copy.

Thank you,

Colette

Colette M. Williams

CMC/CMMC

Town Clerk

Brewster, MA

"The Secretary of the Commonwealth has determined that email is considered a public record."

From: Lauren Estevez [mailto:lauren@margolinlawrence.com]

Sent: Thursday, April 19, 2018 2:03 PM

To: Lynn St. Cyr <lstcyr@brewster-ma.gov>; Colette Williams <cwilliams@brewster-ma.gov>

Cc: Eric Macomber <eric@margolinlawrence.com>; Sam Newmark <sam@margolinlawrence.com>

Subject: Re: Notice of Public Meeting - Marijuana Project - May 1, 2018 @ noon

Hi Ms St Cyr and Ms Williams,

Please confirm receipt of the Notice and whether you will also need a mailing in order to consider the document filed with the Town and Planning Dept.

Thanks!
Lauren

Attachment C

NOTICE OF COMMUNITY OUTREACH MEETING Cape Cod Grow Lab, LLC

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Cape Cod Grow Lab, LLC

Chris Dias

Artak Sahakyan

Atul Salunke
Joel Winstanley Flanders

Cape Cod Grow Lab, LLC
Licnese No. MP281446
Renewal Application No. MPR243584

Host Community Information

3. Municipal Cost Documentation

Our facility is not yet operational, and so have not accrued any costs directly related to the operations of the establishment. The only costs accrued are for the construction and build out of the facility including building permits, and licensing fees. As such, we have not requested any records from the host community related to the operation of the establishment.

Plan for Positive Impact in an Area of Disproportionate Impact - Wareham, MA

Executive Summary

Cape Cod Grow Lab will be an active participant in the Massachusetts community, not only as a business but as a positive fixture for the neighborhood, the town of Brewster, and the state of Massachusetts as a whole. To that end, educational and financial resources from Cape Cod Grow Lab's operation will go to support not only new businesses in the Cape Cod area, but also communities which have been disproportionately negatively affected by the short and long-term consequences of the War on Drugs.

In particular, Cape Cod Grow Lab will give educational and logistical support to organizations operating within areas designated by the Commission as Areas of Disproportionate Impact. Our goals include:

- (1) developing business networks for accelerator applicants within the worlds of cannabis and business;
- (2) business operational consulting so that these entrepreneurs can effectively run their business;
- (3) sharing our expertise on marketing, design and packaging, and social media with social equity candidates so that they can effectively promote their businesses; and
- (4) assisting applicants with the materials they need in order to successfully fundraise and plan their businesses;

We will track the success of these measures by setting up a regular series of meetings with all cooperating businesses, in order to objectively assess the financial and structural well-being of the businesses in question while also addressing any questions or concerns that small business owners may have.

Wareham Business Support Program

The closest Area of Disproportionate Impact to the proposed Cape Cod Grow Lab premises is Wareham, MA. In order to give back to this area, Cape Cod Grow Lab will work closely with startups and small business owners serving the community, providing logistical support and management training as necessary. Cape Cod Grow Lab will aim to mentor and accelerate (10) startup companies in the disproportionate impact area, which is the area nearest to our business premises.

The first step towards achieving this will be identifying and evaluating promising new businesses in Wareham, MA. This will require us to work with the Wareham Village Association and the Onset Bay Association as a means to locate and contact existing incubator and accelerator programs in the community. The cannabis industry currently demonstrates innovation under the scope of shifting regulations, but there is a precedent of enthusiasm behind the product itself. Whether helping fledgling cannabis businesses or startups focused on tech-innovation in Massachusetts, we understand the inevitable pitfalls of budgeting, working with state and local agencies, investment, and changes in market demand. However, while the momentum of cannabis

enthusiasm is likely to continue due to recent legislation, not all startups are working in as optimistic a framework. Through management training and business skill development, Cape Cod Grow Lab plans to offer individual workshops to members of the organizations affiliated with our program.

(a) Business Plan Guidance

As an established business, Cape Cod Grow Lab will also use its knowledge of the legal world of the cannabis industry to help develop its network. The cannabis industry is still in its infancy, leading many new operators to feel intimidated by the laws and processes around applying for a cannabis business license and ensuring regulatory compliance. Cape Cod Grow Lab will serve as an advisor to these businesses, drawing from our own experience to act as mentors to equity businesses. Through direct relationships with these businesses, Cape Cod Grow Lab will answer any questions that arise before or during the application and licensing processes.

Additionally, Cape Cod Grow Lab will share its business connections with new business owners in need of help developing their business plans. For instance, Cape Cod Grow Lab will be able to recommend security contractors, cannabis waste disposal companies, and other businesses that the equity business may choose to contract for assistance with their operations. As a new business owner, knowing which organizations are reputable and dependable can be challenging, so having Cape Cod Grow Lab's knowledge to draw on will be a valuable resource for newer businesses.

(b) Business Operations Consulting

As longtime business owners, the founding managers of Cape Cod Grow Lab have gained years of experience in branding and marketing, including logo and package design, social media presence, packaging compliance, and logistics. Cape Cod Grow Lab plans to guidance as well as connections to vendors for services that assist startup companies in finding their place in the market and develop a brand while keeping costs low.

These education and consulting opportunities will cover a broad range of subjects, providing startups and small business owners with valuable information to help their businesses succeed. In addition to partnering with specific businesses in Wareham, Cape Cod Grow Lab is looking into hosting a series of workshops which will allow business owners to learn about subjects such as crafting business plans, writing *pro forma* statements, and optimizing marketing and launch strategies to suit their brands. We will also build professional skills applicable beyond the cannabis industry, teaching incubator clients how to use software and technology like Excel, MS word, Quickbooks and Canva for designing marketing materials. In addition to their usefulness in cannabis business, these skills will serve Equity Business owners well throughout their careers.

In addition to these educational programs, Cape Cod Grow Lab will work one-on-one with these businesses to develop marketing strategies for their individual brand. Cape Cod Grow Lab hopes to help business owners build their social media

presence and digital marketing strategies, in order to provide business owners with the resources and skills to successfully design their own marketing in the future.

(c) Technical Assistance

We will also provide training to our applicants on technology for marketing like Instagram, Google Ads and facebook. Additionally, if needed, we can provide guidance on MS Word, MS Excel, Quickbooks, POS Software, and Track & Trace. Our Technical Assistance will be responsive to the needs of the particular applicants and the CCC's guidance. In addition, we can provide assistance with interpreting the state regulations and increasing access to legal services for social equity applicants.

(d) Fundraising and Investment

With regards to developing a network of investors and financiers, the team at Cape Cod Grow Lab plan to help new businesses work through the complexities of attracting investors and coordinating fundraising opportunities. First and foremost, a strong business plan is the most important tool used to draw new investors. We will guide new business owners through the structure and presentation of a pitch deck and business plan, which generally starts with a minimum viable product (MVP). Through mentorship and connections to existing investors, Cape Cod Grow Lab pledges to help entrepreneurs identify sources of capital and foster the formation of peer support groups in the Cape's business community.

Measure Outcomes

Cape Cod Grow Lab feels strongly about giving back to communities that were affected by the War on Drugs and contributing positively to help businesses in regions that suffered a disproportionate impact. We plan to assess the success of our accelerator program no later than one year after attaining licensing in the State of Massachusetts. Our primary means of measuring the positive impact of our efforts to help small businesses will be through documented correspondances and workshops designed to assist ten (10) new businesses in the Wareham area, including Onset Village.

The degree of success with which we can measure our positive impact program will be based on attendance of the workshops and mutually established goals, both long and short term, for each business under the mentorship of Cape Cod Grow Lab. Measurable goals may include financial benchmarks, evaluative feedback from attendees, and any business connections made through our workshops and meetings.

Furthermore, we pledge to hold a fundraiser to provide these new businesses with a resource network open to funding new ventures. There is no shortage of investment and research companies in Cape Cod, and we feel confident in our ability to draw from our own network for the purposes of fostering investment among new businesses of all stages in the Wareham region.



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$500.00

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

Certificate of Organization

(General Laws, Chapter)

Identification Number: 001323388

1. The exact name of the limited liability company is: CAPE COD GROW LAB LLC

2a. Location of its principal office:

No. and Street: 59 COMMERCE PARK ROAD
 City or Town: BREWSTER State: MA Zip: 02631 Country: USA

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

No. and Street: 59 COMMERCE PARK ROAD
 City or Town: BREWSTER State: MA Zip: 02631 Country: USA

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

THE GENERAL CHARACTER OF THE LIMITED LIABILITY COMPANY IS TO ENGAGE IN ANY LAWFUL ACT OR ACTIVITY FOR WHICH A LIMITED LIABILITY COMPANY MAY BE FORMED UNDER THE ACT AND TO ENGAGE IN ANY AND ALL ACTIVITIES NECESSARY, ADVISABLE, CONVENIENT, OR INCIDENTAL THERETO. SUCH BUSINESS SHALL PRIMARILY INCLUDE PRODUCTION AND MANUFACTURING.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: ARTAK SAHAKYAN
 No. and Street: 59 COMMERCE PARK ROAD
 City or Town: BREWSTER State: MA Zip: 02631 Country: USA

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	CHRIS DIAS	59 COMMERCE PARK ROAD BREWSTER, MA 02631 USA
MANAGER	ARTAK SAHAKYAN	59 COMMERCE PARK ROAD BREWSTER, MA 02631 USA
MANAGER	JOSHUA MARSTON FLANDERS	59 COMMERCE PARK ROAD BREWSTER, MA 02631 USA

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

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	CHRIS DIAS	59 COMMERCE PARK ROAD BREWSTER, MA 02631 USA
REAL PROPERTY	ARTAK SAHAKYAN	59 COMMERCE PARK ROAD BREWSTER, MA 02631 USA
REAL PROPERTY	JOSHUA MARSTON FLANDERS	59 COMMERCE PARK ROAD BREWSTER, MA 02631 USA

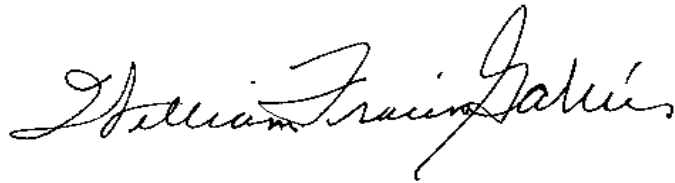
9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 18 Day of April, 2018,
/S/ JESSICA R. MANGANELLO AS ATTY IN FACT FOR CAPE COD GROW LAB
(The certificate must be signed by the person forming the LLC.)

THE COMMONWEALTH OF MASSACHUSETTS

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

April 18, 2018 12:23 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 Commonwealth of Massachusetts
Secretary of the Commonwealth
State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the
Commonwealth

April 20, 2018

TO WHOM IT MAY CONCERN:

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

CAPE COD GROW LAB LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **April 18, 2018.**

I further certify that said Limited Liability Company has filed all annual reports due and paid all fees with respect to such reports; that said Limited Liability Company has not filed a certificate of cancellation or withdrawal; and that said Limited Liability Company is in good standing with this office.

I also certify that the names of all managers listed in the most recent filing are: **CHRIS DIAS, ARTAK SAHAKYAN, JOSHUA MARSTON FLANDERS**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **CHRIS DIAS, ARTAK SAHAKYAN, JOSHUA MARSTON FLANDERS**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **CHRIS DIAS, ARTAK SAHAKYAN, JOSHUA MARSTON FLANDERS**



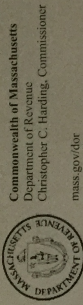
In testimony of which,
I have hereunto affixed the
Great Seal of the Commonwealth
on the date first above written.

William Francis Galvin

Secretary of the Commonwealth

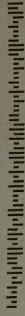


Letter ID: LI149193490
Notice Date: April 25, 2018
Case ID: 0-900-544-388



Commonwealth of Massachusetts
Department of Revenue
Christopher C. Handing, Commissioner
mass.gov/dor

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



000072

ARTAK SAHAKYAN
CAPE COD GROW LAB LLC
59 COMMERCE PARK RD
BREWSTER MA 02631-3116

Why did I receive this notice?

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

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

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

What if I have questions?

If you have questions, call us at (617) 887-6367 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-messages
- Sign up for e-billing to save paper
- Make payments or set up autopay

Edward W. Coyle, Jr., Chief
Collections Bureau

OPERATING AGREEMENT

OF

CAPE COD GROW LAB LLC

THIS OPERATING AGREEMENT (hereinafter referred to as the "Agreement") is effective as of April 26, 2018 by and between the individuals identified on Schedule A attached hereto (hereinafter individually referred to as a "Manager" or "Member" and/or collectively as "Managers" or "Members").

EXPLANATORY STATEMENT

Cape Cod Grow Lab LLC has been formed as a limited liability company under the Massachusetts Limited Liability Act (hereinafter referred to as the "Act") pursuant to Articles of Organization filed with the Massachusetts Secretary of State on April 18, 2018 as hereby duly authorized by the Members. The Articles of Organization are hereby ratified, confirmed and approved by the Members. The Members join herein to regulate and establish the affairs of Cape Cod Grow Lab LLC and the relations of its Members.

NOW, THEREFORE, in consideration of the mutual promises of the parties hereto, each to the other, and of good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, it is mutually agreed by and between the parties hereto as follows:

1. Formation and Name. The Members have hereby formed a limited liability company, known as "Cape Cod Grow Lab LLC" (hereinafter referred to as the "Company").

2. Principal Office and Mailing Address; Resident Agent. The principal office and mailing address of the Company shall be 59 Commerce Park Road, Brewster, MA 02631 or such other location chosen by the Managers. The name and address of the resident agent shall be as identified on Schedule A, attached hereto and as later updated by the Managers.

3. Purposes. The purposes for which the Company is formed are to own and operate an agricultural cultivation, manufacturing, and production business and related activities and services and for such other purposes as permitted by law; and to do all things necessary, convenient or incidental to the foregoing.

4. Term. The Company shall have a term beginning as of April 18, 2018 pursuant to the further terms of this Agreement.

5. Members and their Percentage of Interest. The names and addresses of the Members of the Company are as set forth on Schedule "A" attached hereto and made a part hereof. Each Member shall have a percentage interest ("Percentage Interest") in the Company as set forth opposite his or her respective name on Schedule "A" attached hereto.

6. Votes. Except where superseded by another section of this Agreement or required by the terms of the Statute or Act, all decisions made by or on behalf of the Company shall be

approved by a majority of the votes (“Vote”) of the Members, wherein each Member is entitled to one vote per each 1% of the Percentage Interest held by such Member. The Managers are permitted to grant passive memberships in the Company. A “Passive Member” is one that does not have any voting rights for their Membership Interest and shall not be considered for purposes of reaching a Vote and such non-voting Passive Members shall be identified on Schedule A attached hereto. In the event that the Members are divided and are unable to reach a Vote with respect to any proposed course of action as provided for herein, within ten (10) days after such request for action by any Member, after good faith negotiations and attempts to find a compromise on the underlying subject matter of the Vote, a deadlock (the “Deadlock”) shall be deemed to exist. In the event of a Deadlock, the Managers, on behalf of the Company, shall retain the services of an uninterested, third-party professional with expertise in the subject matter of the proposed course of action, over which there is a Deadlock. Such professional’s services shall be paid for by the Company and their determination shall be binding on the Company and each Member.

7. Capital. As their initial capital contributions, the Members shall have contributed to the Company the cash amount set forth on Schedule "A" attached hereto and made a part hereof. No additional contributions have been agreed to be made by the Members. Any Member may make additional contributions and/or loans to the company at such time or times, and upon such conditions, as the Member and the Manager may determine.

8. Capital Accounts. An individual capital account shall be maintained for each Member. Each Member's capital account shall be computed and maintained in accordance with the Treasury Regulations promulgated under Section 704(b) of the Internal Revenue Code of 1986, as amended (hereinafter referred to as the "Code").

9. Profits, Losses and Distributions. For each fiscal year of the Company, income and loss of the Company shall be allocated to the Members pro rata in accordance with their respective percentages of Interest. For each fiscal year of the Company, cash and other property available for distribution (prior to liquidation) as determined by the Manager in his or her discretion, shall be distributed among the Members pro rata in proportion to their respective Percentages of Interest. When the Company is liquidated or dissolved, the assets of the Company shall be distributed to the Members pro rata in accordance with their respective capital account balances, after all allocations of income and loss in the year of liquidation. Distributions from the Company to the Members shall be at the times and in the amounts determined by the Manager in his or her discretion.

10. Management.

(a) The Managers shall have the exclusive right to manage the business of the Company and shall have the exclusive authority to make all decisions on behalf of the Company. All decisions shall be made by a majority of the Managers. Any deed, bill of sale, lease, mortgage, note, deed of trust, bond, financing statement, option, contract, or other document related to the Company may be signed by a single Manager and no other signature shall be required. In the event that the Managers are divided and are unable to reach agreement with respect to any proposed course of action as provided for herein, after good faith negotiations and attempts to reach a compromise concerning such proposed course of action, within ten (10) days after such request for action by any Manager, a deadlock (the “Deadlock”) shall be deemed to exist. In the event of a Deadlock, the proposed course of action shall be referred to the Members for a Vote. The

Managers agree to be bound by the decision of, and to proceed with the course of action determined by the Members.

(b) The Manager(s) initially shall be those identified on Schedule A. The Required Majority may remove a Manager at any time and elect a substitute Manager. In the event of the death, disability, removal, liquidation, dissolution, bankruptcy, or retirement of a Manager, the Required Majority shall elect a substitute Manager. The term "Required Majority" shall mean those Members owning more than fifty percent (50%) of the Percentages of Interest of the Members in question.

(c) The Manager(s) shall have physical possession of the books and records of the Company. Meetings of the Members shall be held on five (5) days' notice, on the call of the Manager. Notice of time and place of each meeting shall be given in writing by the Manager to each Member.

(d) The Managers shall be responsible for preparation, maintenance, filing and dissemination of all necessary returns, notices, statements, reports, minutes or other information to the Internal Revenue Service, the Commonwealth of Massachusetts, and any other appropriate state, city, or federal authorities or agencies.

(e) No Member, acting alone, shall have any authority to act for or bind the Company or any other Member for any obligation, debt, duty or responsibility. No Member is an agent of the Company solely by virtue of being a Member, and no Member has authority to act for the Company solely by virtue of being a Member.

11. Company Labor and Salaries. The Members shall, from time to time, enter into separate agreements to regulate their respective salaries or commissions for work performed for the Company. The Members may also, from time to time, enter into separate agreements to the number of hours of work per week entered into for the Company. The Members initially agree that they shall work for the Company unpaid unless and until the Managers, in their sole discretion, determine the amounts and timing of any salary, commission or other payment. Compensation for the Managers shall be determined by the Managers from time to time and approved by the Members.

12. Transfers by Members.

(a) No Member may voluntarily transfer, sell, assign, alienate, encumber, mortgage, pledge or otherwise dispose of all or any portion of its interest in the Company without the prior written consent of the Required Majority of the non-transferring Members.

(b) Any Member who wishes to transfer all or any part of his or her interest in the Company shall immediately provide the Managers with written notice of his or her intention. The notice shall fully describe the nature of the interest to be transferred. Thereafter, the Managers, or their nominee, acting on behalf of the Company, shall have the option to purchase the transferor's interest for the Company ("Right of First Refusal") at a price equal to the lesser of (i) the amount that the transferor would receive if the Company were liquidated as of the date of the proposed transfer and an amount equal to the appraised value of the Company was available for distribution to the Members, or (ii) the same terms of the bona fide third party offer described in

the departing Member's written notice; (iii) or by any manner agreed upon by the Members. The Members, acting by consent, may appoint an appraiser to determine the value of the company. Such person shall be a third party which has no ownership or involvement in the Company. Such person's services shall be paid for by the Company and their determined value shall be binding on the Company for the purposes of such transfer. This Right of First Refusal shall be irrevocable and shall remain open for thirty (30) days from the date that notice is given, except that if notice is given by regular mail, the option shall remain open for thirty-five (35) days from the date that notice is given to the Managers. At any time while the Right of First Refusal remains open, the Managers may elect to exercise it and purchase the transferor's interest in the Company, in whole or in part. The transferor Member shall not vote on the question of whether the Managers should exercise its option. If the Managers choose to exercise its option to purchase the transferor's interest, it shall provide written notice to the transferor within the option period, unless otherwise agreed. The notice shall specify the amount of equity being purchased and a closing date for the purchase, which shall occur within thirty (30) days of the expiration of the option period. On the closing date, the transferor shall be paid the purchase price, as provided for below, and shall deliver an instrument of title, unencumbered and containing warranties of title, conveying his or her interest in the Company. If the Managers, acting on behalf of the Company, exercise the option to have the Company buy the transferor's interest, in whole or in part, the Company shall then distribute such interest pro-rata among the remaining Members.

(c) In the event of the death, adjudication of incapacity, disability, or bankruptcy of a Member, the Company has a first right of refusal to purchase the entire Membership Interest of the decedent, incapacitated, disabled or bankrupt Member, for the fair market value thereof. In the event that the Company declines to exercise this option, within sixty (60) days of the death, determination of disability, or adjudication of incapacity or bankruptcy, the estate, heirs, guardian or trustee, as the case may be, of such deceased, incapacitated, disabled, or bankrupt Member shall automatically be deemed to be the assignee of such Member's interest, retroactive to the date of such occurrence, subject to the terms hereof.

(d) The assignee of a Member's interest in the Company shall be entitled to share in the income and losses of the Company and to receive distributions with respect to the interest which it acquires but shall not become a substitute Member nor be entitled to vote such interest and until the conditions of Section 12(e) are satisfied.

(e) The assignee of a Member's interest shall only become a substitute Member and thereby entitled to vote such interest if such assignee: (i) executes and delivers such documents, and takes such other action, as the Manager shall deem reasonably necessary or advisable to cause it to become a substitute Member; (ii) agrees to be bound by the terms and provisions of this Agreement; (iii) pays such expenses as may be incurred by the Company in connection with such admission; and (iv) shall, if requested by the Manager, present an opinion of counsel, acceptable to counsel to the Company, that the admission of the assignee as a Member would not violate applicable state and federal securities laws or adversely affect the status of the Company as a partnership for federal income tax purposes.

Notwithstanding anything contained in this Agreement to the contrary, any substitute Member for a deceased, incapacitated or bankrupt Member shall have no voting rights whatsoever as to such interest in the Company.

(f) In the event such assignee is so admitted as a substitute Member pursuant to this Section 12, Schedule A shall be amended accordingly.

(g) In the event of a marital dissolution which has the effect of granting any interest in any membership interest held by a Member in the Company, the Company shall have the right to purchase such Member's interest that is specifically subject to the rights of such Member's spouse, partner, former spouse, partner, or other third party, for the fair market value thereof.

(h) The transfer of a Member's entire interest in the Company shall not automatically dissolve or terminate the Company. Upon the consummation of such transfer, the transferor shall be deemed to have withdrawn as a Member and shall have no further rights under this Agreement.

(h) A Member does not have the right to voluntarily withdraw from the Company, unless upon six (6) months' notice and pursuant to this Section 12.

(i) A Person ceasing to be a Member, or the legal representative or other successor to the Interest of that Member, shall not be entitled to require that the Company purchase the Member's Interest in liquidation thereof nor be entitled to the fair market value of the Member's Interest upon ceasing to be a Member.

(j) For purposes of this agreement, a Member shall be deemed to be disabled if at the end of twelve (12) months of continuous total disability as defined in the Company's then current long-term disability policy, or if none, then the individual Member's existing long term disability policy, or if none, then any existing waiver of premium rider on any life insurance policy made subject to this agreement, the disabled Member shall still be totally disabled.

(k) Unless the parties agree otherwise, any purchase price, provided for in this Section 12 shall be paid as follows:

- (i) Initial Payment. Ten percent (10%) of the amount determined to be due as the price to be paid at the closing and the balance to be payable by the execution of a promissory note in such amount to be repaid in quarterly installments, at the Company's discretion, maturity date not to exceed five (5) years, such note to be secured by the equity interest being sold.
- (ii) Interest. Any promissory note contemplated hereby, shall bear interest until paid in full at the prime rate as determined from time to time by Wall Street Journal as of the offer date or any bank or other source as determined by and agreed upon by the Managers.
- (iii) Cost of Collections. In the event that suit shall be required to collect on any promissory notes, then in such event, the defaulting Member or the Company shall pay for attorney fees, and courts costs, incurred in such action.
- (iv) Binding Formulas. The Members agree that the methodology for the purchase price described in Section 12 (b) above results in a fair market valuation that is

equitable and adequate consideration and the parties further agree that the purchase price determined by such formulas shall be binding and conclusive upon the parties hereto.

13. Confidentiality and Intellectual Property. The Members and Managers shall keep secret and maintain in strictest confidence and shall not use for their personal benefit or for the benefit of others any confidential or proprietary information relating to the Company, its current and/or prospective customers or affiliates, including, without limitation, all intellectual property, strategies, policies, and internal files and records, other than any of such information that is in the public domain prior to the date of this Agreement or thereafter comes into the public domain (unless any of such information is in or becomes in the public domain in whole or in part due to action or inaction of a Member in violation of this Agreement). The Members and Managers agree and acknowledge that all intellectual property, products, inventions or other works created in whole or in part by a Member or Manager during the course of providing services to the Company shall be the sole property of the Company and such Member or Manager shall have no rights, title, or ownership to any such intellectual property, products, inventions, or other works. The foregoing shall not prohibit use of such information as is required by applicable law, or as is necessary to prepare tax returns or other filings with governmental authorities for the period (including all prior taxable years) ending on and including the date of this Agreement, or to assert or protect any rights of Members under this Agreement.

14. Dissolution.

(a) Upon the death, adjudication of incapacity or bankruptcy of any Member (hereinafter referred to as a "Governing Occurrence"), the Company shall be dissolved unless the majority of the remaining Members elects within ninety (90) days of the Governing Occurrence that the business of the Company shall be continued.

(b) Subject to any restrictions in agreements to which the Company is a party, the Company may be dissolved and terminated upon the determination of the Required Majority.

(c) Upon the dissolution of the Company, the affairs of the Company shall be promptly liquidated by discharging all debts and liabilities of the Company, establishing reserves in the discretion of the Manager, and by distributing all remaining assets to the Members in accordance with the provisions of Section 9 hereof.

15. Books and Records. Accounting records of the Company shall be kept and these shall be open to inspection by any of the Members at all reasonable times during business hours. The "Tax Matters Partner," as defined in Code section 6231(a) (7), is that Person designated by the Company in Section 8.6 to serve as the Company's representative in all examinations of the Company's affairs by taxing authorities.

16. Bank Accounts. All funds of the Company shall be deposited in Company checking or other bank accounts, subject to such authorized signatures as the Manager may determine.

17. Other Interests. Any Member may engage in or possess an interest in other business ventures of every nature and description as long as said business venture or interest does not

directly or indirectly compete with the business of Company, unless upon written approval of the Company, and neither the Company nor any other Member or Manager shall have any rights by virtue of this Agreement or the existence of this Company in and to said independent ventures or to the income or profits therefrom. The fact that a Member or Manager owns or is otherwise directly or indirectly interested in or connected with, any person, firm or corporation employed or retained by the Company to render services, shall not prohibit the Company from employing such person, firm or corporation or from otherwise dealing with it, and neither the Company nor any of the Members or the Manager shall have any rights in or to an income or profits derived therefrom.

18. Waiver of Partition. Each of the Members and its successors and permitted assigns irrevocably waives any right to partition any of the Company's assets or apply for a judicial dissolution of the Company.

19. Indemnification. The Manager and Members shall be indemnified by the Company to the fullest extent provided by law. The Members shall have no fiduciary duties whatsoever, whether to each other or to the Company, unless that Member is a Manager of the Company, in which instance they shall owe only the fiduciary duties of a Manager.

(a) No Member, Manager, employee or agent of the Company and no employee, agent or affiliate of a Member (collectively, the "Covered Persons") shall be liable to the Company or any other person who has an interest in or claim against the Company for any loss, damage or claim incurred by reason of any act or omission performed or omitted by such Covered Person in good faith on behalf of the Company and in a manner reasonably believed to be within the scope of the authority conferred on such Covered Person by this Agreement, except that a Covered Person shall be liable for any such loss, damage or claim incurred by reason of such Covered Person's gross negligence or willful misconduct.

(b) To the fullest extent permitted by applicable law, a Covered Person shall be entitled to indemnification from the Company for any loss, damage or claim incurred by such Covered Person by reason of any act or omission performed or omitted by such Covered Person in good faith on behalf of the Company and in a manner reasonably believed to be within the scope of the authority conferred on such Covered Person by this Agreement. Expenses, including legal fees, incurred by a Covered Person defending any claim, demand, action, suit or proceeding shall be paid by the Company. The Covered Person shall be liable to repay such amount if it is determined that the Covered Person is not entitled to be indemnified as authorized in this Agreement. No Covered Person shall be entitled to be indemnified in respect of any loss, damage or claim incurred by such Covered Person by reason of such Covered Person's gross negligence or willful misconduct with respect to such acts or omissions. Any indemnity under this Agreement shall be provided out of and to the extent of Company assets only.

(c) A Covered Person shall be fully protected in relying in good faith upon the records of the Company and upon such information, opinions, reports or statements presented to the Company by any person as to matters the Covered Person reasonably believes are within such other person's professional or expert competence and who has been selected with reasonable care by or on behalf of the Company, including

information, opinions, reports or statements as to the value and amount of the assets, liabilities, or any other facts pertinent to the existence and amount of assets from which distributions to the Members might properly be paid.

(d) To the extent that, at law or in equity, a Covered Person has duties (including fiduciary duties) and liabilities relating thereto to the Company or to any other Covered Person, a Covered Person acting under this Agreement shall not be liable to the Company or to any other Covered Person for its good faith reliance on the provisions of this Agreement. The provisions of the Agreement, to the extent that they restrict the duties and liabilities of a Covered Person otherwise existing at law or in equity, are agreed by the Members to replace such other duties and liabilities of such Covered Person.

20. Amendment. This Agreement may be amended with the consent of the Managers, provided that any amendment which would increase the liability of a Member shall require the approval of the Required Majority. The Members hereby agree that upon the Company's cessation of operating an investment and financial services business, the Members shall require the Managers to commission an amended Operating Agreement. This Agreement shall remain in effect until the adoption of such amended agreement.

21. Gender. The use of any gender herein shall be deemed to include the other genders and the use of the singular herein shall be deemed to be or include the plural (and vice-versa) wherever appropriate. The headings herein are inserted only as a matter of convenience and reference and in no way defined, limit or describe the scope of this Agreement, or the intent of the provisions thereof.


22. Counterparts. This Agreement may be executed in counterparts, each of which shall be deemed an original and all of which when taken together shall constitute one and the same instrument, binding on the Members, and the signature of any party to any counterpart shall be deemed a signature to, and may be appended to, any other counterpart.

23. Buy-Sell Agreements. In the event of a Buy-Sell Agreement executed between the Company and any Members, which was approved by the Managers in their sole discretion, then such Buy-Sell Agreement shall supersede the restrictions on transfer contained in this Agreement.

24. Adjudication. Each Member agrees that all disputes arising under or in connection with this Agreement and any transactions contemplated by this Agreement shall be governed by the internal law, and not by the law of conflicts, of the Commonwealth of Massachusetts. The Members hereby agree that in the event of a dispute they agree to binding arbitration. Jurisdiction for any dispute or arbitration hereunder, shall be in Essex County, in the Commonwealth of Massachusetts.


25. Benefit. This Agreement shall inure to the benefit of the Members and Managers only, and no third parties (including creditors of the Company) are entitled to enforce the provisions hereof.

WHEREFORE, the Members and/or Managers acknowledge that this Operating Agreement is their act and that they have executed this Operating Agreement as of the day and year first above written.

DocuSigned by:

155B052B521049C...
Chris Dias
Managing Member

DocuSigned by:

266F34A378C4419...
Artak Sahakyan
Managing Member

DocuSigned by:

085518A1D084439...
Joshua Marston Flanders
Managing Member

CAPE COD GROW LAB LLC

SCHEDULE A

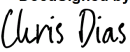
<u>Name and Address</u>	<u>Initial Capital Contribution</u>	<u>Percentage of Interest</u>
Chris Dias		45%
Joshua Marston Flanders		10%
Artak Sahakyan		45%
TOTAL		100.0 %

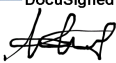
Resident Agent: Artak Sahakyan


Registered Office: 59 Commerce Park Road, Brewster, MA 02631

Tax Matters Partner: Artak Sahakyan

Schedule A shall be amended to include the name, present mailing address, and percentage ownership of any Additional Members. The Members and Managers of Cape Cod Grow Lab LLC hereby agree to abide by the terms and conditions of this Schedule A and the Operating Agreement of Cape Cod Grow Lab LLC.

DocuSigned by:

155B052B521049C...
Chris Dias

DocuSigned by:

266F34A378C4419...
Artak Sahakyan

DocuSigned by:

085518A1D084439...
Joshua Marston Flanders

III. Management and Operations Profile

Business Registration - LLC #001323388

- Cape Cod Grow Lab LLC is registered with the State of Massachusetts as a Limited Liability Company.
- See Appendix for Articles of Incorporation, Operating Agreement, Certificate of Good Standing from the Secretary of State, and Certificate of Tax Compliance.

Business Plan - Cape Cod Grow Lab, LLC

Executive Summary

Cape Cod Grow Lab will be a high-quality cannabis cultivator and manufacturer that provides Bay Staters with access to the relaxation and enjoyment of a weekend on the Cape year round. We will be a leader in growing, manufacturing, and branding and will be known throughout the state for our high-quality strains and products. Legal cannabis is a promising and profitable industry, and we will succeed with the right mix of marketing, leadership, and high quality products that resonate with consumers.

Cape Cod Grow Lab will draw on the high-end cannabis brands that have developed in the California market but will have a brand that is regionally distinct to

Cape Cod. To start, we have selected some popular high-CBD strains that provide a unique experience and allow for consumers to control their dosing. With the increasing popularity of online information sources such as Leafly.com, consumers are becoming more educated than ever and seeking out specific strains for their ailments or conditions, or for the particular recreational experience they are seeking out. We will produce not only flower but also high quality extracts and vape pens that are portable and discreet.

Our production facility will be located in Brewster, MA on an industrial parcel that once served as a ship-yard but has since been cleaned up by founder Chris Dias under the 21(E) provision of the Massachusetts Code.⁴ Chris took a property that was not on the tax rolls and brought it online after investing significantly in the property's clean up and environmental rejuvenation. All of our owners are residents of the Cape and Islands and preservation of the surrounding environment will be central to our vision and our mission.

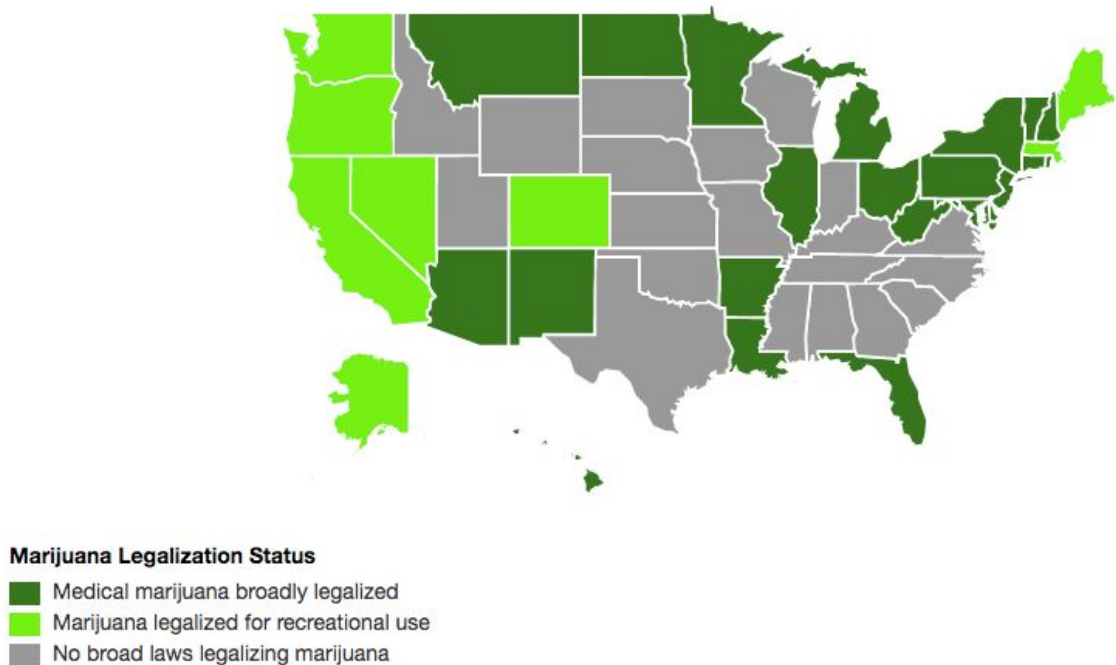
In addition to our distinct brand and product, we bring a leadership team that is highly experienced in running successful businesses on the Cape - Specialty Builders' Supply, Chris Dias's lumber company, A&A Building and Remodeling, Artak Sahakyan's home remodeling company, and Josh Flanders' Flanders and Crew.

⁴ Massachusetts General Law, Part I, Title II Chapter 21 (E), <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleII/Chapter21E>

Market Opportunity

Legal cannabis is one of the fastest growing industries in the United States, and is expected to add more than 250,000 jobs to the American economy by 2020.⁵ At present, Marijuana is considered legal in thirty states and the District of Columbia.⁶ As prohibition draws to a close in many U.S. states, and adult-use markets open, demand for cannabis is increasing out of both curiosity and a desire to avoid the harms of alcohol and other drugs.

Information is current as of March 30, 2018.

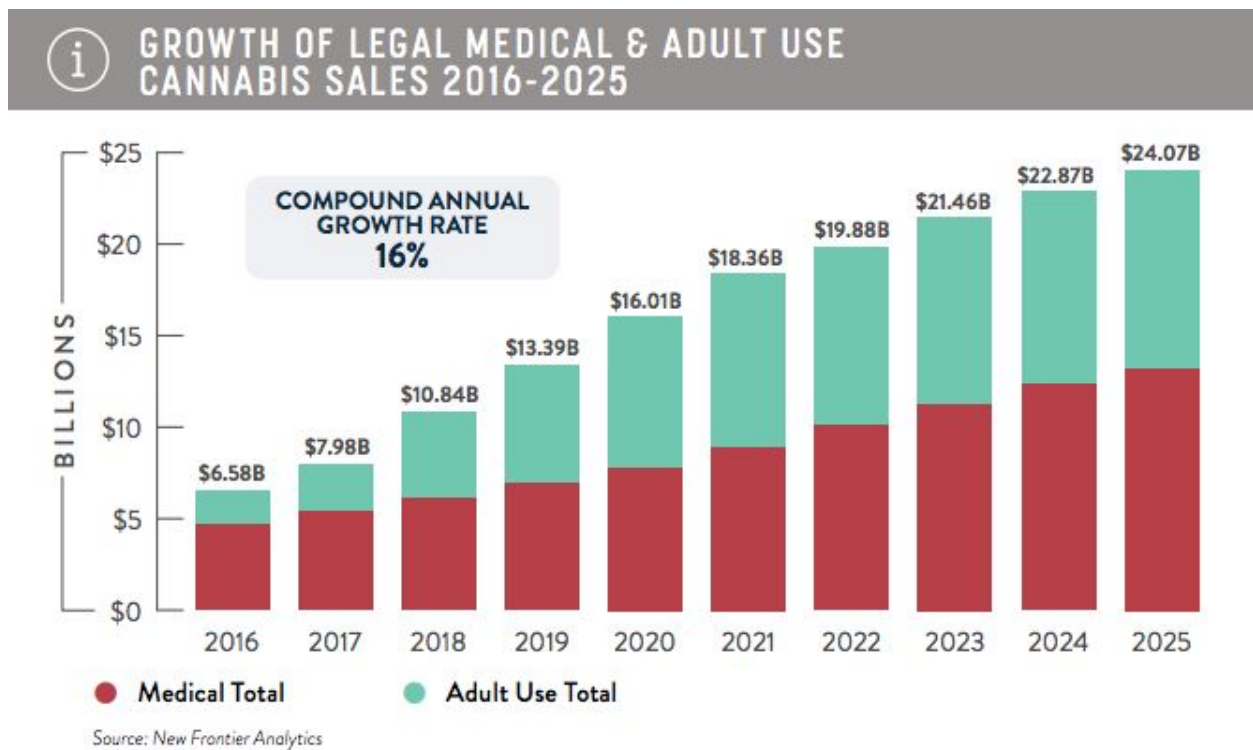


⁵ “The Cannabis Industry Annual Report: 2017 Legal Marijuana Outlook,” *New Frontier Data* (2017), <https://newfrontierdata.com/annualreport2017/>

⁶ “State Marijuana Laws in 2018 Map”, *GOVERNING*, <http://www.governing.com/gov-data/state-marijuana-laws-map-medical-recreational.html>

Adult-use laws allow consumers over 21 years of age to purchase cannabis, without a need for a medical prescription. With the increased accessibility, demand for cannabis products has increased in all states that have opened for adult-use and those markets have grown exponentially year over year. Many turn to cannabis to replace painkillers and other drugs which can have adverse side effects. Increasingly, young people are using marijuana as a substitute for alcohol and finding that it avoids some of the harmful after effects caused by a night of drinking.

Massachusetts opened for Adult-Use sales in 2018 and will experience similar market growth with a compound annual growth rate of 16% year over year.⁷



⁷ “The Cannabis Industry Annual Report: 2017 Legal Marijuana Outlook,” *New Frontier Data* (2017), <https://newfrontierdata.com/annualreport2017/>

Over the next four years, the legal cannabis market in Massachusetts is forecast to grow from \$52.0 million in 2016 solely from medical use sales, to an estimated \$1.07 billion in 2020 with medical and adult-use sales combined.⁸ The majority of the growth will be through adult-use sales.⁹ The current state of the law creates an opportunity for an open and expansive market. BDS Analytics compiles data on the cannabis industry, and the company projects that legal recreational cannabis spending could grow as high as \$929 million by 2021, and estimates that in 2018 sales will reach \$304 million.¹⁰ We are well positioned to capitalize on this opportunity and want to make sure that the revenue goes not only to businesses on the mainland, but also to those on the Cape and the Islands.

Given that Massachusetts is a liberal bastion, center of higher education, and tourism destination, it is in a unique position to experience exponential growth in cannabis sales. Tourism is an increasingly significant sector of the State's economy with over 23 million tourists visiting the state annually.¹¹ While none of these tourists would have been eligible to participate in the state's marijuana economy under the medical

⁸ "State Profile: Massachusetts" *Arcview Market Research*,
<https://www.arcviewmarketresearch.com/profile-massachusetts/>

⁹ Terry Hacienda, "\$10 Billion: North Americans Marijuana Spending Up 33% in 2017", *The Fresh Toast* (December 2017),
<https://thefreshtost.com/cannabis/north-americans-spent-10-billion-on-marijuana-in-20>

¹⁰ "US Legal Cannabis: Driving \$40 Billion Economic Output", *BDS Analytics*,
<https://bdsanalytics.com/press/new-report-legal-marijuana-industry-to-generate-40-billion/>

¹¹ Carolyn Voorhees, "Where do Massachusetts tourists come from?", *Boston Globe* (2016),
<https://www.bostonglobe.com/magazine/2016/06/10/where-massachusetts-tourists-come-from/M7IXI2wbqxi0p0RFAXxhKO/story.html>

laws, they will now be able to partake in the adult-use market. Moreover, cannabis is popular among young people, particularly college students, meaning that Boston, home to over 152,000 higher education students, is uniquely positioned to become a significant market consumer of the state's legal cannabis.¹²⁻¹³

Our business understands that cannabis is a high-risk, high-reward industry. We will mitigate legal risks by adhering to strict compliance at all phases of our operation and obtaining all of the necessary local and state approvals before we begin construction. More details on our plans for compliance can be found in the Cultivation Plan and the Manufacturing Plan. In addition to the legal risks, we are also familiar with the high taxation rates for cannabis businesses and the restrictions on 280(E) deductions. The Company's proposed operations are subject to all business risks associated with new enterprises. The likelihood of the Company's success must be considered in light of the problems, expenses, difficulties, complications, and delays frequently encountered in connection with a start-up business, operating in a highly-regulated environment, and the continued development of the change in legal structure as related to cannabis. The management team is familiar with both the cannabis market and the associated risks and is prepared to execute the business plan within the framework of a highly-regulated environment.

¹² Morgan Sherburne, "Marijuana use among college students at highest level in 30 years", *University of Michigan News* (8 September 2017),

<https://record.umich.edu/articles/marijuana-use-among-college-students-highest-level-30-years>

¹³ "Boston By The Numbers", Peter Meade, Director, *Boston Redevelopment Authority* (March 2011), <http://www.bostonplans.org/getattachment/1770c181-7878-47ab-892f-84baca828bf3>

Business Description & Strategy

Cape Cod Grow Lab (“CCGL”) will produce high-quality, organic cannabis for the Massachusetts market. We will use the safest cultivation methods to produce our flower, pre-rolls, and cannabis extract. Our brand will be synonymous with the natural beauty and relaxation that many enjoy on the Cape. Much like craft beers and wines develop flavor properties from their location, our flower will be enhanced by the environment surround the plants as they grow on Cape Cod. Our products will be consistent and will contain information not only about strain genetics but also about terpene profiles, THC, and CBD content. We believe that CCGL’s chosen activities and strategies are achievable in light of current economic and legal conditions with the skills, background, and knowledge of our principals and advisors.

CCGL will serve health-conscious cannabis consumers of all ages and demographics, from college students to retirees. Much like the Cape has broad appeal among Bay Staters, our product will be accessible and sought-after for its quality and unparalleled experience. With the adult-use market opening up in Massachusetts, many consumers will be trying cannabis for the first time in many years, or may have never tried it. We will provide advice on dosing and strain profiles so that each customer can have a tailored experience with our products. We will choose the strains for our flower and extract products based on consumer demand, with an eye towards less prevalent strains so that we can distinguish ourselves from other cultivators and manufacturers.

Our products will be developed so that consumers are encouraged to purchase multiple strains to find the best fit.

We will use business processes developed from our years as contractors and lumber yard owners. Industrial cultivation and manufacturing will use many of the same techniques we currently do such as developing task process training, QC protocols, inventory control, and forging and strengthening supplier relationships. Our cultivation methods will use biologically safe products to ensure the plants remain free from fungus and other pests. We will also feed the plants organic nutrients so that they can reach their full capacity for flowering. Finally, we will package our flower in branded individual containers so that our consumers can come to recognize our product on the store shelves. Our manufacturing process will use advanced closed-loop machines that provide for the safest extraction experience while simultaneously producing the highest outputs. In addition to manufacturing cannabis extract, we will manufacture our vape cartridges so that we do not have to pay a processor those additional costs.

In conclusion, Cape Cod Grow Lab will represent a unique and differentiated product in the Massachusetts Adult-Use marketplace and will appeal to a broad range of Bay Staters through our branding, product quality, and product selection.

Leadership Team

Our team brings over 40 years of Massachusetts business experience to the project from the lumber, boating, and home remodeling industries. In addition to our

business expertise, we will be working with an expert cannabis consultant to advise us on the build out and planning of our cultivation and manufacturing facilities.

Chris Dias – President, Managing Member

Chris is a business owner and 46 year Cape Cod resident. He has run Specialty Builders' Supply from Brewster for over 17 years. The company he started alone now has 35 employees and an additional location on Martha's Vineyard where he was born. Chris lived in Brewster for 16 years and recently moved to Orleans with his wife and daughter.

Artak Sahakyan – Vice President, Managing Member

Born in Armenia, Artak Sahakyan came to America in 2002 in search of a better life. Trained as a civil engineer, he pumped gas and washed dishes until he got an opportunity to enter the U.S. construction industry as a laborer and carpenter. Developing his English skills, he worked his way up in the industry and became a fixture of the community, starting a framing and remodeling business in 2004 and gaining American citizenship in 2012.

Today, Artak is the owner and operator of A&A Building and Remodeling Inc.,¹⁴ a successful home remodeling business in Chatham with nearly 20 employees working in two office locations. A&A's territory covers Boston proper, all of Cape Cod and the

¹⁴ A&A Building and Remodeling Inc., <http://aabuildingremodelingllc.com/>

Islands. The business continues to create new lists of services, and their client base has increased significantly as well.

Artak has been a resident of Massachusetts for many years. He has even been featured on *Home Again with Bob Vila* for one of his remodeling projects. Artak is also heavily involved in the local community and recently organized an event to protect and promote International Human Rights through the Armenian Church of Cape Cod. In 2017, seeing a need to help children retain their native speaking language, Artak launched the International Language and Mathematics School in Osterville. The school provides language and math instruction for children in grades K-6, offering Armenian, Portuguese, and Russian studies.

Joshua Marston Flanders – Managing Member

Joshua is the owner of Flanders and Crew Inc., a general contracting company he started over 30 years ago on the island of Martha's Vineyard. Joshua moved to the island in the 1980s and started building homes, and he has a successful business based on quality and integrity. Joshua sees this new business opportunity as a chance to work with educated, creative professionals with the common goal of creating a quality company.

Detailed Description of Products & Strains

Cape Cod Grow Lab will sell flower, pre-rolls, and cannabis extract vaporizer pens. Our strains will vary based on market demand but we are most interested in focusing on some high-CBD strains for their anti-inflammatory properties and the fact that CBD is non-psychoactive so some of the psychoactive effects of cannabis can be properly controlled and dosed correctly. In addition we will sell easy to grow and popular hybrids like sherberts and gelatos. We will stagger the strains so that we have different strains harvesting at different times and have a harvest every few weeks rather than having all the plants mature at the same time.

CCGL Flower (Dried Cannabis Flower)

- **Strains (8)**

- **Maui Wowie (Hybrid)**

Maui Wowie is a strain that originated from Hawaii during the 1960's. The pineapple flavored strain provides a uplifting high that energizes and deters fatigue and depression. The leaves on this plant are densely packed and fully covered in crystal trichomes. Maui Wowie features a tropical taste that can be broken down into flavors of citrus, pineapple, and sweetgrass.

- **Blue Dream (Indica)**

Blue Dream is one of the most popular strains of cannabis. Creativity and energy are associated with this plant. Blue Dream is a very commercialized strain and considered a cult classic. It promotes feelings

of euphoria and relaxation and can relieve stress, fatigue, and depression. This plant takes seven to nine weeks to flower and yields around three to six ounces of product. Orange hairs that weave through the plant can be discovered upon close inspection. Flavors of berry blueberry characterize the smell and taste of Blue Dream.

- **Canna-Tsu (Hybrid - High CBD):**

Canna-Tsu is a cross between Cannatonic and Sour Tsunami, both of which are high CBD strains. Canna-Tsu is a hybrid that produces a 1:1 ratio of THC and CBD. CBD is an anti-inflammatory agent, a muscle relaxant, and a mood booster. Users who wish to not feel psychoactive effects from cannabis can turn to CBD rich strains as alternatives.

Canna-Tsu can be used to treat pain, depression, Arthritis, Gastrointestinal Disorder, Muscular Dystrophy, Multiple Sclerosis, Parkinson's, Spasticity, and mental health problems (i.e. bipolar disorder, anxiety, PTSD).

- **Harle-Tsu (Hybrid - High CBD):**

Harle-Tsu is a hybrid that contains a 5:2 CBD to THC ratio. This strain is most commonly used for medical purposes because of its' high CBD content. Harle-Tsu treats pain, nausea, and stress while promoting focus and no cerebral high. Users report feelings of high alertness, clarity, and relaxation. This strain is a cross between Harlequin and Sour Tsunami, two strains that are rich in CBD. Patients pick this strain as a top choice for chronic pain relief as the CBD average for this strain is 18-20%.

- **CBD Mango Haze (Hybrid - Sativa Dominant, High CBD)**

CBD Mango Haze is a strain that contains a 2:1 CBD to THC ratio. This is a sativa-dominant hybrid that retains its potency while still maintaining high CBD content. CBD Mango Haze boosts energy, promotes socialization, and improves mood. Users can turn to this strain to control

pain, nausea, and seizures, or if they want anxiolytic effects without the psychoactive ones.

- **Pennywise (Indica - High CBD)**

Pennywise is an indica hybrid that has a 1:1 ratio of CBD and THC. This equilibrium uplifts user's moods while still keeping them alert and functioning. Pennywise is a cross between two CBD rich strains, Jack the Ripper and Harlequin. Because the strain produces mild psychoactive effects, it is commonly used to treat depression, insomnia, stress and pain relief. Pennywise is also used to remedy ADD, ADHD, Crohn's Disease, epilepsy, and cancer. THC and CBD content range from twelve to fifteen percent. Pennywise palates flavors of wood, pepper, and bubblegum, and the plant can be characterized by its broad leaves and copper hues.

- **Sunset Sherbet (Hybrid)** - This high intensity, indica-leaning hybrid is good for feeling focused, uplifted, hungry, and energized. Sunset Sherbet is an heavy hitter with intoxicatingly potent effects. Stress, tension, and sour moods melt away with the carefree mindset and physical relaxation that comes with this rich hybrid.

- **Gelato (Hybrid)** - Gelato induces heavy-handed euphoria. Physical relaxation comes on strong, but many find themselves still mentally agile enough to stay productive and creative when enjoying Gelato during the day.

CCGL Pre-Rolls (pre-rolled joints)

- Strains (8) – See Descriptions Above:
 - Maui Wowie
 - Blue Dream
 - Canna-Tsu
 - Harle-Tsu

- CBD Mango Haze
- Pennywise
- Sunset Sherbert
- Gelato

CCGL Cannabis Extract & Vape Cartridges (Extract in the form of vape cartridges)

- Strains (8) – See Descriptions Above:
 - Maui Wowie
 - Blue Dream
 - Canna-Tsu
 - Harle-Tsu
 - CBD Mango Haze
 - Pennywise
 - Sunset Sherbert
 - Gelato

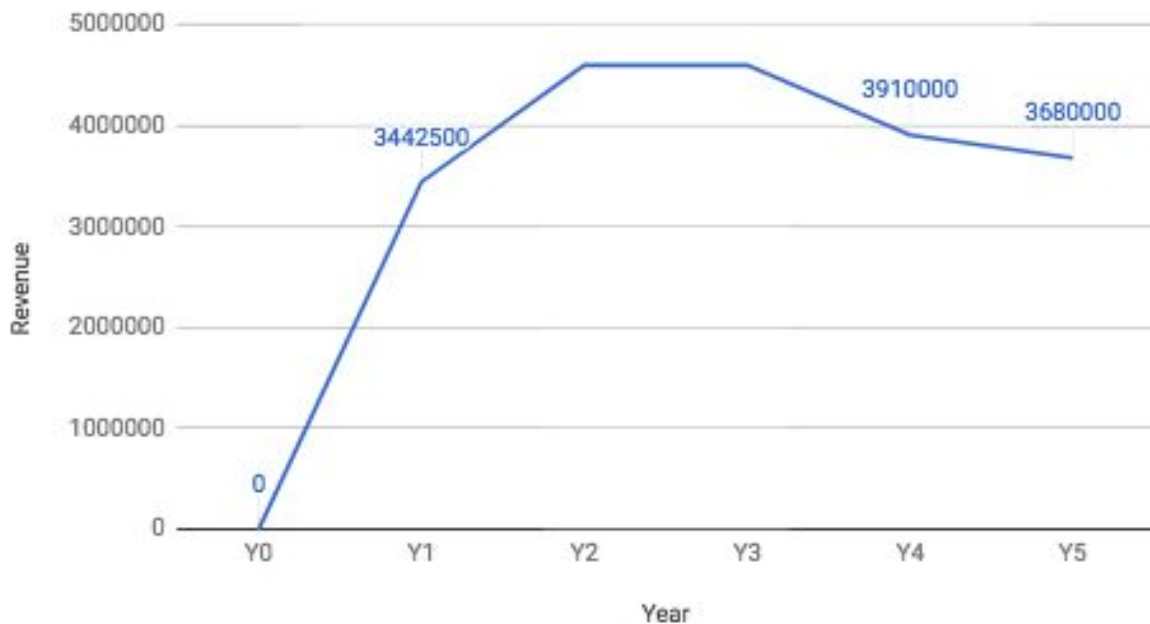
Financial Plan

We have initial capital to start the build out of a facility (\$472,025). Any owners or investors greater than 10% will be disclosed to the Cannabis Control Commission (“CCC”) for approval before moving forward. Right now we are planning on raising additional funds to cover the additional start up costs beyond the facility so that we can have adequate runway to achieve a successful operation in our first year.

We estimate we will generate over \$3M in revenue in year 1 and our operating costs will be close to \$2M in year 1, including buildout of the cultivation facility, purchasing manufacturing machines, building out a secure premises, and payroll for the

first year for five employees. Our business will be diversified between flower and extracts, and extracts can command extremely high prices because of the popularity of vaping and the expense of the machines involved in generating clean oils. Our projections are based on a conservative price for flower, \$2,000 per pound. The market price for flower in Massachusetts is actually higher than that right now and we are also forecasting for market fluctuations as have been seen in other states like Colorado and Washington, that once the legal cannabis market expands and the price per pound for flower will go down. Our detailed five year pro forma can be found in the Appendix.

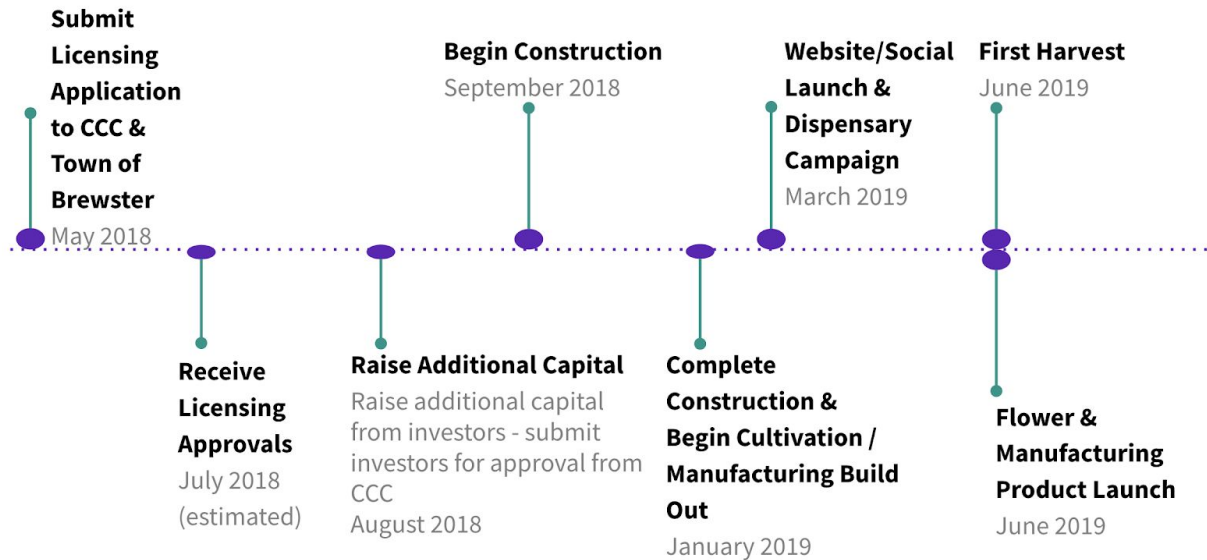
CCGL 5 Year Revenue Projections



Timeline for Marijuana Establishment

We estimate it will take us about 2-3 months to complete the licensing process, 5-6 months to construct a building on the property, and an additional 4 months to complete the build out of the manufacturing and cultivation facilities. Once the plants are mature, we will have a harvest every 8-12 weeks. In addition to the construction build out we will be executing a brand awareness campaign, building out our social media presence and PR mentions, and growing our relationships with existing dispensaries in the time leading up to the first harvest.

Cape Cod Grow Lab, LLC Timeline to Operation



Liability Insurance Policy

Before beginning operations, Cape Cod Grow Lab will obtain liability insurance that meets all state requirements. The business will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(J)(2) or otherwise approved by the Commission. The deductible for each policy will be no higher than \$5,000 per occurrence. We will obtain quotes from Hiscox and AAG.

Cape Cod Grow Lab, LLC

7,000 sq. ft. Canopy Cultivation Facility - Brewster, MA

5 Year Pro Forma

YEAR 1 - June 2019- May 2020		YEAR 2 - June 2020-May 2021		YEAR 3 - June 2021-May 2022		YEAR 4 - June 2022-May 2023		YEAR 3 - June 2023-May 2024	
RENT									
Rent	\$192,000	Rent	\$192,000	Rent	\$192,000	Rent	\$192,000	Rent	\$192,000
UTILITIES									
Electricity - \$6,000 per month	\$72,000	Electricity - \$6,000 per month	\$72,000	Electricity - \$6,000 per month	\$72,000	Electricity - \$6,100 per month	\$73,200	Electricity - \$6,100 per month	\$73,200
Water - \$5,000 per month	\$60,000	Water - \$5,000 per month	\$60,000	Water - \$5,041 per month	\$60,492	Water - \$5,100 per month	\$61,200	Water - \$5,041 per month	\$61,200
CONSTRUCTION / INSTALLATION / EQUIPMENT									
Building Construction	\$400,000	Building Construction	\$0	Building Construction	\$0	Building Construction	\$0	Building Construction	\$0
Climate Control / HVAC	\$150,000	Climate Control / HVAC Maintenance	\$10,000	Climate Control / HVAC Maintenance	\$10,000	Climate Control / HVAC Maintenance	\$20,000	Climate Control / HVAC Maintenance	\$10,000
Lights	\$45,000	Replacement of Light Bulbs	\$24,000	Replacement of Light Bulbs	\$20,000	Replacement of Light Bulbs	\$20,000	Replacement of Light Bulbs	\$20,000
Biometric Scanners	\$5,000	Biometric Scanners	\$150	Biometric Scanners	\$150	Biometric Scanners	\$150	Biometric Scanners	\$150
Fire Sprinklers/Alarms	\$12,000	Fire Sprinklers/Alarms	\$0	Fire Sprinklers/Alarms	\$0	Fire Sprinklers/Alarms	\$0	Fire Sprinklers/Alarms	\$0
Sprinklers (Agricultural)	\$21,000	Sprinklers (Agricultural)	\$0	Sprinklers (Agricultural)	\$0	Sprinklers (Agricultural)	\$0	Sprinklers (Agricultural)	\$0
Odor Control	\$30,000	Odor Control	\$30,000	Odor Control	\$30,000	Odor Control	\$30,000	Odor Control	\$30,000
AGRICULTURE									
Soil	\$50,000	Soil - additional	\$50,000	Soil - additional	\$50,000	Soil - additional	\$50,000	Soil - additional	\$50,000
Clones - new strains	\$70,000	Clones - new strains	\$25,000	Clones - new strains	\$10,000	Clones - new strains	\$10,000	Clones - new strains	\$10,000
Nutrients - \$5,000 per month	\$60,000	Nutrients - \$5,000 per month	\$60,000	Nutrients - \$5,000 per month	\$60,000	Nutrients - \$5,000 per month	\$60,000	Nutrients - \$5,000 per month	\$60,000
Liability Insurance - \$1,000,000 coverage per incident	\$10,000	Liability Insurance - \$1,000,000 coverage per incident	\$10,000	Liability Insurance - \$1,000,000 coverage per incident	\$10,000	Liability Insurance - \$1,000,000 coverage per incident	\$10,000	Liability Insurance - \$1,000,000 coverage per incident	\$10,000
Pots	\$1,500	Pots	\$1,500	Pots	\$1,500	Pots	\$1,500	Pots	\$1,500
Plastic water reservoir	\$150	Plastic water reservoir	\$0	Plastic water reservoir	\$150	Plastic water reservoir	\$0	Plastic water reservoir	\$0
Fans, Carbon Filters	\$12,000	Fans, Carbon Filters replacements	\$1,000	Fans, Carbon Filters replacements	\$400	Fans, Carbon Filters replacements	\$400	Fans, Carbon Filters replacements	\$400
Trimmers	\$1,200	Trimmers - replacements	\$200	Trimmers - replacements	\$100	Trimmers - replacements	\$100	Trimmers - replacements	\$100
Natural pesticides for minimal use	\$900	Natural pesticides for minimal use - refills	\$750	Natural pesticides for minimal use	\$750	Natural pesticides for minimal use	\$750	Natural pesticides for minimal use	\$750
MANUFACTURING									
Extraction Tek Solution Manufacturing Machine	\$90,000	Extraction Tek Solution Manufacturing Machine - Maintenance	\$10,000	Extraction Tek Solution Manufacturing Machine - Maintenance	\$10,000	Extraction Tek Solution Manufacturing Machine - Maintenance	\$10,000	Extraction Tek Solution Manufacturing Machine - Maintenance	\$10,000
Division 1 Prefabricated Room for Fire Safety	\$10,000	Division 1 Prefabricated Room for Fire Safety	\$0	Division 1 Prefabricated Room for Fire Safety	\$0	Division 1 Prefabricated Room for Fire Safety	\$0	Division 1 Prefabricated Room for Fire Safety	\$0
10 Vacuum Ovens - Cascade	\$30,000	10 Vacuum Ovens - Cascade	\$0	10 Vacuum Ovens - Cascade	\$0	10 Vacuum Ovens - Cascade	\$0	10 Vacuum Ovens - Cascade	\$0
Vacuum Pumps	\$30,000	Vacuum Pumps	\$0	Vacuum Pumps	\$0	Vacuum Pumps	\$0	Vacuum Pumps	\$0
ROTO Vape Machine to put oil into vape cartridges	\$40,000	ROTO Vape Machine to put oil into vape cartridges	\$0	ROTO Vape Machine to put oil into vape cartridges	\$0	ROTO Vape Machine to put oil into vape cartridges	\$0	ROTO Vape Machine to put oil into vape cartridges	\$0
TRANSPORTATION									
Vehicle	\$30,000	Vehicle maintenance	\$2,000	Vehicle maintenance	\$2,000	Vehicle maintenance	\$2,000	Vehicle maintenance	\$2,000
Insurance	\$1,400	Insurance	\$1,400	Insurance	\$1,400	Insurance	\$1,400	Insurance	\$1,400
Fuel	\$2,400	Fuel	\$2,400	Fuel	\$2,400	Fuel	\$2,400	Fuel	\$2,400
STAFF									
Master Grower	\$108,000	Master Grower	\$120,000	Master Grower	\$140,000	Master Grower	\$140,000	Master Grower	\$140,000
General Manager	\$85,000	General Manager	\$96,000	General Manager	\$96,000	General Manager	\$96,000	General Manager	\$96,000
1 Cultivator	\$50,000	1 Cultivator	\$50,000	1 Cultivator	\$50,000	1 Cultivator	\$50,000	1 Cultivator	\$50,000

1 Master Manufacturer	\$108,000	1 Master Manufacturer	\$108,000	1 Master Manufacturer	\$108,000	1 Master Manufacturer	\$108,000	1 Master Manufacturer	\$108,000
Workers compensation insurance and payroll taxes - \$2,000 per month	\$24,000	Workers compensation insurance and payroll taxes - 2100 / mo	\$25,200	Workers Compensation insurance and payroll taxes - 2500 / month	\$30,000	Workers Compensation insurance and payroll taxes - 2500 / month	\$31,000	Workers Compensation insurance and payroll taxes - 2500 / month	\$32,000
Employee Health Insurance	\$21,000	Employee Health Insurance	\$23,000	Employee Health Insurance	\$24,000	Employee Health Insurance	\$25,000	Employee Health Insurance	\$26,000
Employee Safety									
Employee Safety		Employee Safety		Employee Safety		Employee Safety		Employee Safety	
Protective gear - boots, coveralls, gloves, masks etc. for 5 workers	\$5,000	Protective gear - boots, coveralls, gloves, masks etc. for 5 workers - necessary replacements	\$400	Protective gear - boots, coveralls, gloves, masks etc. for 5 workers - necessary replacements	\$800	Protective gear - boots, coveralls, gloves, masks etc. for 5 workers - necessary replacements	\$800	Protective gear - boots, coveralls, gloves, masks etc. for 5 workers - necessary replacements	\$800
Consumer Safety		Consumer Safety		Consumer Safety		Consumer Safety		Consumer Safety	
BioTrack THC Track & Trace (\$3k / month)	\$36,000	BioTrack THC Track & Trace (\$3k / month)	\$36,000	BioTrack THC Track & Trace (\$3k / month)	\$37,000	BioTrack THC Track & Trace (\$3k / month)	\$38,000	BioTrack THC Track & Trace (\$3k / month)	\$39,000
Testing	\$45,000	Testing	\$46,000	Testing	\$47,000	Testing	\$47,500	Testing	\$48,000
SECURITY									
Additional Security Monitoring System \$2000 per month	\$24,000	Additional Security Monitoring System \$2000 per month	\$24,000	Additional Security Monitoring System \$2000 per month	\$24,000	Additional Security Monitoring System \$2000 per month	\$24,000	Additional Security Monitoring System \$2000 per month	\$24,000
Cameras & Installation	\$7,500	Cameras & Installation	\$500	Cameras & Installation	\$500	Cameras & Installation	\$500	Cameras & Installation	\$500
Professional Development / Training for all employees									
THC University - continuing education & online training	\$480	THC University - continuing education & online training	\$480	THC University - continuing education & online training	\$480	THC University - continuing education & online training	\$480	THC University - continuing education & online training	\$480
Branding, Marketing, Social									
Brand Agency or Consultant annually	\$75,000	Brand Agency or Consultant annually	\$75,000	Brand Agency or Consultant annually	\$75,000	Brand Agency or Consultant annually	\$75,000	Brand Agency or Consultant annually	\$75,000
Instagram management	\$36,000	Instagram management	\$36,000	Instagram management	\$36,000	Instagram management	\$36,000	Instagram management	\$36,000
Public Relations	\$36,000	Public Relations	\$36,000	Public Relations	\$36,000	Public Relations	\$36,000	Public Relations	\$36,000
Sales									
Sales Manager	\$80,000	Sales Manager	\$85,000	Sales Manager	\$90,000	Sales Manager	\$90,000	Sales Manager	\$90,000
Brand Ambassadors	\$40,000	Brand Ambassadors	\$40,000	Brand Ambassadors	\$40,000	Brand Ambassadors	\$40,000	Brand Ambassadors	\$40,000
Licensing & Compliance									
Application & Annual License Fees - State (estimate)	\$10,000	Application & Annual License Fees - State (estimate)	\$10,000	Application & Annual License Fees - State (estimate)	\$10,000	Application & Annual License Fees - State (estimate)	\$10,000	Application & Annual License Fees - State (estimate)	\$10,000
Surety Bond	\$5,000	Surety Bond	\$5,000	Surety Bond	\$5,000	Surety Bond	\$5,000	Surety Bond	\$5,000
Accountant	\$48,000	Accountant	\$50,000	Accountant	\$52,000	Accountant	\$52,000	Accountant	\$52,000
Annual Operating Costs - Total	\$2,270,530	Total Spend - Year 2	\$1,418,980	Total Spend - Year 3	\$1,435,122	Total Spend - Year 3	\$1,450,380	Total Spend - Year 3	\$1,443,880
Annual Revenues - Cultivation 2000 pounds x \$2000 / lb.	\$3,442,500	Annual Revenues - 2300 pounds x \$2000 / lb.	\$4,600,000	Annual Revenues - 2300 pounds x \$2000 / lb.	\$4,600,000	Annual Revenues - 2300 pounds x \$1700 / lb.	\$3,910,000	Annual Revenues - 2300 pounds x \$1600 / lb.	\$3,680,000
Annual Revenues - Manufacturing - \$150000 per month (\$15 / gram x 10000)	\$1,800,000	Annual Revenues - Manufacturing - \$150000 per month (\$15 / gram x 10000)	\$1,800,000	Annual Revenues - Manufacturing - \$150000 per month (\$15 / gram x 10000)	\$1,800,000	Annual Revenues - Manufacturing - \$180000 per month (\$15 / gram x 12000)	\$2,160,000	Annual Revenues - Manufacturing - \$180000 per month (\$15 / gram x 12000)	\$2,160,000
Taxable Income (Estimated)	\$2,971,970	Taxable Income (Estimated)	\$4,981,020	Taxable Income (Estimated)	\$4,964,878	Taxable Income (Estimated)	\$4,619,620	Taxable Income (Estimated)	\$4,396,120
TAXES									
Brewster 3% of Gross per Host Community Agreement	\$103,275	Brewster 3% of Gross per Host Community Agreement	\$138,000	Brewster 3% of Gross per Host Community Agreement	\$138,000	Brewster 3% of Gross per Host Community Agreement	\$117,300	Brewster 3% of Gross per Host Community Agreement	\$110,400
MA State Tax 10.75%	\$370,069	MA State Tax 10.75%	\$494,500	MA State Tax 10.75%	\$494,500	MA State Tax 10.75%	\$420,325	MA State Tax 10.75%	\$395,600

U.S. Corporate Tax (No Deductions Allowed under 280(e))	\$624,114	U.S. Corporate Tax (No Deductions Allowed under 280 (e))	\$1,046,014	U.S. Corporate Tax (No Deductions Allowed under 280 (e))	\$1,042,624	U.S. Corporate Tax (No Deductions Allowed under 280(e))	\$970,120	U.S. Corporate Tax (No Deductions Allowed under 280(e))	\$923,185
Total Costs including all Taxes	\$3,367,987	Total Costs including all Taxes	\$3,097,494	Total Costs including all Taxes	\$3,110,246	Total Costs including all Taxes	\$2,958,125	Total Costs including all Taxes	\$2,873,065
Revenue minus total costs*	\$1,874,513	Revenue minus total costs*	\$3,302,506	Revenue minus total costs*	\$3,289,754	Revenue minus total costs*	\$3,111,875	Revenue minus total costs*	\$2,966,935

Liability Insurance Policy

Before beginning operations, Cape Cod Grow Lab will obtain liability insurance that meets all state requirements. The business will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(J)(2) or otherwise approved by the Commission. The deductible for each policy will be no higher than \$5,000 per occurrence. We will obtain quotes from Hiscox and AAG.

Separating Medicinal and Recreational Products

Currently, Cape Cod Grow Lab only plans to cultivate, manufacture and transport cannabis for adult-use. Because we will only be processing for adult-use, no separation will be required but if we ever apply for a medical license as well we will ensure that the two product lines are separated to the extent required by law. We will be using BioTrackTHC to track and trace all of our products from seed to sale, so if we ever integrate medical into our practices, we will be able to separate the recreational and medical product using this technology. Additionally, we hold our manufacturing practices to the highest standards and would ensure that even our recreational marijuana is medical grade meaning that we will use only safe and minimal pesticides and the most natural indoor growing methods possible resulting in a safe and health-conscious product.

All Marijuana Products Will Be Tested

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

Preventing Diversion - Product Security

Product security will be maintained as a priority and all employees and contractors will strictly adhere to Cape Cod Grow Lab policies and procedures or disciplinary/removal measures will be taken. In compliance with the MCCC Regulations Cape Cod Grow Lab, will implement policies and procedures in order to secure all cannabis product and ensure that none is lost or diverted to individuals who are not authorized to possess it or person/s under the age of 21.

Reporting Responsibility

Cape Cod Grow Lab will notify appropriate law enforcement authorities and the Commission within 10 calendar days of any breach of security immediately and, in no instance, more than 24 hours following discovery of the breach. Notification will occur, but not be limited to, inventory discrepancies, diversion, theft or loss of marijuana, criminal and suspicious activity, unauthorized destruction, and alarm activation.

Security Program Implementation

During the startup phase of the operation, there will be an implementation and testing period of the security systems and procedures. These steps and milestones will be followed:

1. Design and deploy the system;
2. Provide appropriate training including the provision of operational and response procedures, training manuals, schedules, plans, training agendas, and trainee evaluations;
3. Define operation and maintenance roles and responsibilities; and
4. Establish a process of systems installations, commissioning, testing, evaluating, acceptance, and rejection.

Preventing Access by those Under 21 - Physical Security

We will ensure that our facility is not accessible to anyone under 21 years of age. In fact, with limited access to the facility, only our employees and owners will be able to enter and exit by using a key card system and one point of entry for the property.

According to security industry best practices, these are the elements that are essential to a comprehensive facility physical security program:

1. Building design that lends itself to being secured;
2. Physical barriers and site hardening;
3. Physical entry and access control;
4. Security lighting;
5. Intrusion detection;

6. Video surveillance;
7. Electronic and network controls;
8. Personnel; and
9. Administrative procedures.

Cape Cod Grow Lab will implement sufficient safety measures to deter and prevent unauthorized entrance into areas containing marijuana and the theft of marijuana.

No Access for those Under Age 21 - Positive Identification

Cape Cod Grow Lab will positively identify individuals seeking access to the premises of the Marijuana Establishment or to whom or marijuana products are being transported pursuant to 935 CMR 500.105(14) to limit access solely to individuals 21 years of age or older.

Premises will include all indoor or outdoor locations over which Cape Cod Grow Lab or its agents may lawfully exert substantial supervision or control over entry or access to the property or the conduct of persons.

Procedures will be adopted to prevent loitering and ensure that only individuals engaging in activity expressly or by necessary implication permitted by these regulations and its enabling statute are allowed to remain on the premises.

No Access for those Under 21 - Perimeter Security

Cape Cod Grow Lab will ensure that all marijuana products are kept out of plain sight and are not visible from a public place without the use of binoculars, optical aids or aircraft.

A perimeter security fence designed to prevent unauthorized entry to the cultivation facility with signs notifying observers that it is a limited access area will be constructed. Trees, bushes and other foliage outside of the premises will be maintained so as to prevent a person or persons from concealing themselves from sight.

Signage

“No Loitering, Public Drinking, or Public Smoking/ Consumption of Cannabis” signs will be posted in and outside of the Cape Cod Grow Lab premises.

Graffiti

All graffiti on the site will be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.

Security Lighting

Site security lighting will be designed to facilitate surveillance and augment other security measures such as physical barriers, intrusion detection systems, video surveillance, and security

personnel activities. These lights will be regularly inspected and properly maintained. Some lights will have emergency power backup capabilities.

No Access to those under 21 years of age - Access Control

A comprehensive access control program is an important part of any effective commercial cannabis operation.

All entrances to the Cape Cod Grow Lab premises will be controlled to prevent unauthorized access. Limited access areas will be established pursuant to 935 CMR 500.110(4), which will be accessible only to specifically authorized personnel limited to include only the minimum number of employees essential for efficient operation.

Access to the Cape Cod Grow Lab site, and entry and exit to all limited access areas will have electronic access control requiring identity verification that records the movements of employees. Cape Cod Grow Lab will only permit authorized individuals to enter the access areas of the premises. Authorized individuals include individuals employed by Cape Cod Grow Lab as well as any outside vendors, contractors, labor representatives, or other individuals who have a bona fide business reason for entering the limited-access area. An individual who is not an authorized individual for purposes of entering the limited-access areas will not be permitted to enter the limited-access area at any time for any reason. An individual in the limited-access area who is not employed by the Cape Cod Grow Lab will be escorted by individuals employed by the Cape Cod Grow Lab at all times within the limited-access area. An individual who enters the limited-access areas shall be at least 21 years of age.

Security Zones and Limited Access

The entire site will be limited access and not open to the public. Visitors will be escorted by a Cape Cod Grow Lab employee at all times while on site.

Limited access areas pursuant to 935 CMR 500.110(4) will be accessible only to specifically authorized personnel limited to include only the minimum number of employees essential for efficient operation.

Limited access areas will be identified by the posting of a sign that will be a minimum of 12" x 12" and which states: "Do Not Enter—Limited Access Area—Access Limited to Authorized Personnel Only" in lettering no smaller than one inch in height.

Access to limited access areas will be restricted to employees, agents or volunteers specifically permitted by Cape Cod Grow Lab, agents of the Commission, state and local law enforcement and emergency personnel.

Security Zones

The open spaces, enclosed buildings and structures will be separated into zones and classified according to security levels based on risk.

the Commission. The Commission may charge a fee for packaging and labeling pre-approval. The packaging and labeling pre-approval process shall in no way substitute for compliance with 935 CMR 500.105(4) through (6).

Personnel Policies and Procedures

At-Will Employment

Unless otherwise defined in an employment contract, all employees at Cape Cod Grow Lab will be “At Will Employees”. This employment status allows the employee or Cape Cod Grow Lab to immediately terminate the employment relationship at any time with or without advance warning, and with no subsequent liability. Termination of employment may happen with or without cause.

Equal Opportunity Employment

Employees will be hired based solely on personnel requirements and the qualifications of each individual candidate.

Cape Cod Grow Lab will not tolerate nor condone discrimination due to age, race, color, religion, sex, national origin or disability. We will comply with the spirit and letter of all local, state and federal laws pertaining to employment. Furthermore, we will not discriminate due to age, race, color, religion, sex, national origin or disability when making decisions regarding termination of employees.

Eligibility For Employment

Federal law requires both new employees and re-hires to provide documentation of eligibility to work in the United States plus proper proof of identity. A properly submitted form I-9 may be required for employment.

HIPAA Notice and Privacy Practices

The Health Insurance Portability and Accountability Act (HIPAA) includes components to ensure that the personal health information of each employee is protected so that individuals are not afraid to seek health care or to disclose sensitive information to health professionals. It is designed to ensure that protected health information is protected during its collection, use, disclosure and destruction of records at Cape Cod Grow Lab. Any breach of this policy will be reported to the Human Resources Department.

Violence

Threats of violence or acts of violence will be strictly prohibited. Employees threatening or committing acts of violence will be subject to appropriate disciplinary action, up to and including termination.

Weapons

Weapons are generally defined as guns, knives and other objects universally considered a weapon by the vast majority of society. A “weapon” can also be any object

which would do harm to another when used as such. Cape Cod Grow Lab will deem any such object a “weapon” for the purpose of enforcing of this policy.

Possession of weapons will be prohibited on company property and while on duty performing company business at any location. Any employee on duty or on company premises in possession of a weapon will be subject to appropriate disciplinary action, up to and including termination.

No use of Alcohol, Drugs, Tobacco or Illegal Substances Permitted At Facility

Possession of alcohol, illegal drugs or other illegal substances is not permitted on company property, or while on duty in the employment of Cape Cod Grow Lab.

Furthermore, employees are not permitted to report for duty while under the influence of marijuana, alcohol, illegal drugs or other substances. Employees failing to adhere strictly to this policy will be subject to disciplinary action, up to and including termination.

No Consumption of Marijuana At the Facility

No consumption of marijuana of any kind will be permitted at the facility. This policy will be strictly enforced. Employees failing to adhere strictly to this policy will be subject to disciplinary action, up to and including termination.

Sexual and Other Unlawful Harassment

It is the objective of Cape Cod Grow Lab to provide a working environment free from discrimination and conduct commonly referred to as sexual harassment.

The E.E.O.C. (Equal Employment Opportunity Commission) has provided a broad definition of sexual harassment. It is general in nature and may not always be clear when evaluating everyday situations.

“Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when

1. submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment,
2. submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting such individual, or
3. such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working environment.”

Sexual harassment refers to behavior inappropriate in the workplace because it is offensive, unwelcome behavior which would not occur but for the sex of the offended person. Both sexual harassment, and accusations of sexual harassment, are disrupting to the work environment.

Cape Cod Grow Lab will investigate any employee, regardless of job position when any allegations regarding sexual misconduct or assault are reported. Based on

available information, Cape Cod Grow Lab will take appropriate action and communicate on a need-to-know basis. Appropriate disciplinary action, up to and including termination will be taken against any individual for sexual harassment charges determined to be valid.

Domestic Violence Statement

Cape Cod Grow Lab recognizes that domestic violence can have an adverse impact on employee job performance, and may also impact co-workers.

Cape Cod Grow Lab will assist employees affected by domestic violence, both the victim and the abuser within reasonable guidelines. Information will remain confidential as long as the safety of others is not at risk.

Personnel File

Cape Cod Grow Lab will maintain a confidential personnel file for each employee. Files will be controlled by the Human Resources department. Employees must acquire permission to view his or her personnel file from the Human Resources department. These files are the property of Cape Cod Grow Lab. No documents may be altered or removed by the employee. Every reasonable effort is made to keep the information confidential and access is limited to staff members who require access to perform their job functions. Copies will not be distributed to any third party unless mandated to do so by a court of law.

Attendance

Punctual attendance is mandatory for efficient job performance. Poor attendance, absence without notification or habitual tardiness will be subject to appropriate disciplinary action, up to and including termination.

Parking

Cape Cod Grow Lab employees are required to park in the employee parking area. All other parking is reserved for customers and visitors.

Work Schedule Requirements

With variations in workload based on Cape Cod Grow Lab's harvesting and production schedule, as well as customer demand, it is CCGL's responsibility to meet critical deadlines. As a result, employees may be required to work overtime be it pre-planned or spontaneous. Overtime is considered mandatory in these instances; it is a condition of employment. See "Overtime Pay" below.

Staff Meetings

Group meetings of several employees as well as meetings of all employees are occasionally scheduled. Every effort is made to schedule these meetings during the hours worked by the vast majority of employees. Written notification for mandatory

meetings will be distributed in advance. All employees are required to attend, when requested, even if it is not during their scheduled work hours.

Bulletin Boards

Bulletin boards placed in designated areas throughout the facility display notices and announcements for employees to review. It is the responsibility of each employee to review the bulletin boards several times per week to be aware of information posted.

Suggestion Box

Cape Cod Grow Lab always encourages employees to submit suggestions, comments or new ideas which may benefit the company or enhance working conditions. For submitters who wish to remain anonymous, every precaution will be made to preserve employee privacy. Management will check the suggestion box on a regular basis for new submissions.

Time Cards

All employees are required to turn in daily time cards reflecting hours worked unless authorized to be exempt, as with supervisory and management personnel. For vacation, paid leave or holidays, time cards must be turned in to accounting for these days/hours.

Lunch Break

Regardless of shift worked, all employees are required to take a lunch break.

Lunch break are for one hour. Schedules may vary from employee to employee based on work schedule and from one department to another.

Breaks

It is in the best interest of our employees and Cape Cod Grow Lab to provide a break from work several times throughout the work day. Typically employees will receive two refreshment breaks, one before and one after the meal break. Schedules may vary from employee to employee based on work schedule and from one department to another.

Medical Attention

Cape Cod Grow Lab will require employees to notify a supervisor when medical attention is required for any reason, accident or illness. Employees requiring transportation to a medical facility will be taken by trained medical personnel. Transportation and medical costs are the responsibility of the employee.

Compensation

Compensation for employment is based on performance. Rates are established by mutual agreement between the employee and Cape Cod Grow Lab. Raises also, are

based on performance, growth and productivity. Employment is based on an as-needed basis. Employees are not guaranteed tenure or retirement benefits.

Overtime

As of December 1, 2016, all Massachusetts employees are entitled to extra pay for authorized overtime hours, per the Department Of Labor, as outlined in the Fair Labor Standards Act, Part 541 "Overtime" Final Rule.³⁴ Overtime pay for qualifying employees, working authorized overtime, will be paid at a rate of one and one-half times the regular rate of pay.

Wage and Salary Disclosure

Compensation programs are confidential between each individual employee and Cape Cod Grow Lab. Disclosure of wages or compensation to any third party is discouraged.

Payroll Schedule

Employees will be paid weekly. Regardless of shift schedule, the work week begins Monday and ends Sunday. In the event payday falls on a holiday, paychecks will be distributed before the holiday.

³⁴ Fair Labor Standards Act, 29 USC §201 et seq.; 29 CFR Part 541, <https://www.dol.gov/compliance/guide/minwage.htm>

Paychecks

Payroll checks will be distributed on payday as established in the “Payroll Schedule” section above. Federal, state and any other required taxes will be withheld from wages as will any voluntary deductions.

Payroll Deductions for Taxes, FICA and Medicare

As required by law, Cape Cod Grow Lab withholds taxes from employee earnings, as well as social security (FICA) and Medicare. Cape Cod Grow Lab also participates in matching programs as required.

Performance & Evaluation Reviews

Annual performance and evaluation reviews will outline the competencies each employee needs to perform his or her job functions successfully. Employee contributions to Cape Cod Grow Lab are also reviewed and documented. The Master Grower and Lab Supervisor will discuss job requirements for respective duties and identify the specific skills of each trimmer and lab technician. All performance reviews will become a permanent part of each employee’s personnel file.

Reporting Personal Information Changes

Employees must notify Cape Cod Grow Lab’s management whenever there is a change in their personal information on file with the company. This includes address,

phone number, income tax withholding information, emergency contacts and if applicable, any information which may impact insurance coverage.

Gifts, Entertainment & Meals

Cape Cod Grow Lab employees and their families are not allowed to give or receive business gifts, favors, meals or entertainment to or from any customers or suppliers of Cape Cod Grow Lab. This most importantly applies to marijuana products made or received by Cape Cod Grow Lab.

Visitors

Due to the nature of our business, security clearances and non-disclosure agreements with CCGL's clients, visitors are not allowed in production or restricted areas. All business visitors must have authorization to enter production areas. Any unauthorized visitors must be reported to Cape Cod Grow Lab's management.

Personal Property

Cape Cod Grow Lab is not responsible for personal property of employees within facilities, vehicles or parking areas. Any personal items brought on premises deemed inappropriate by Cape Cod Grow Lab, will be removed without notice.

Personal Cell Phones, Tablets And Smartphones

Use of personal cell phones, mobile phones or personal digital assistants is approved for business contact during standard working hours. All company information stored on an employee device must be protected, and in the event the device is stolen, the theft must be reported immediately to CCGL's management. Employees agree that any device used to transmit company information is subject to having that information deleted, by Cape Cod Grow Lab representatives, at the termination of employment. This deletion of information may include a complete wiping of the device hard drive. Personal calls will be limited to communication regarding urgent family matters where time is of the essence.

Personal Safety

At Cape Cod Grow Lab, the safety of our employees is a top priority. We will make every reasonable effort to ensure the safest working environment possible. All unexpected dangers and hazards must be reported to CCGL's management. Failure to comply with all health, safety and environmental policies and procedures may result in disciplinary action, up to and including termination.

Food & Beverage

Without exception, food and beverages will be strictly prohibited within immediate proximity of the canopy, processing areas and manufacturing equipment.

Smoking

Smoking is prohibited on the Cape Cod Grow Lab property.

Solicitation

As a courtesy to other employees, Cape Cod Grow Lab does not allow solicitation of political information, religious information or items for sale. Solicitation for sale of items involving fundraisers for nonprofits and other community based organizations benefiting Brewster, MA and other localities may be considered.

Moonlighting

Due to conflict of interest, Cape Cod Grow Lab will not allow employees to “moonlight” – offering any commercial services provided by Cape Cod Grow Lab involving the cultivation, manufacturing, and distribution of marijuana products. Failure to comply with this policy may result in disciplinary action or termination of employment.

Confidential Information Security

As a matter of course, employees of Cape Cod Grow Lab will have access to confidential and proprietary information. This information includes, but is not limited to, personnel information, pricing, client lists, contractual agreements, intellectual property and marketing/sales strategies. It is a condition of employment that employees not

disclose this information to third parties during or after employment. Disclosure of Cape Cod Grow Lab LLC's confidential information without express written approval is prohibited. Failure to comply with this policy may result in disciplinary action, termination of employment, and/or legal action.

Conservation and Recycling

Conserving energy and resources is a priority at Cape Cod Grow Lab. Employees are required to conserve power and water in all reasonable ways. Recycling containers will provided throughout the facility for collection of recyclable materials. Containers will be marked for various materials.

Personal Leave of Absence

Cape Cod Grow Lab will make every reasonable effort to consider personal leave of absence. Many factors are considered when determining eligibility for personal leave of absence and is granted or denied solely at the discretion of Cape Cod Grow Lab. When granted, the maximum allowable is 30 days per calendar year.

Sick Leave

Sick leave benefits are earned at a rate of one day of paid sick leave for every 2 completed calendar months worked. Eligible employees can earn up to six days of sick leave per year. Unused sick leave may be carried to the next year, not to exceed a

maximum of 6 days carried forward. At the end of employment with Cape Cod Grow Lab, employees will not be paid for unused sick leave days.

Violation of Company Policy

Employees found to be in violation of company policy will be given official notice of the infraction. All reasonable attempts to resolve the problem will be made to constructively resolve the situation. Appropriate disciplinary action, up to and including termination, may be taken if the violation continues.

Employees who believe they have been falsely charged with an infraction can appeal the charge to Cape Cod Grow Lab's management. All appeals must be in writing clearly defining the reason the aforementioned employee believes the charge was false. Notices of violation, appeals and final disposition documentation will become a permanent record in the employee's personnel file.

Termination

Employees of Cape Cod Grow Lab will not be given tenure. Any employee of Cape Cod Grow Lab may choose to terminate employment at any time. Employees choosing to terminate their employment with Cape Cod Grow Lab are required to return all company property to their immediate supervisor before leaving the premises on their

final day of employment. Upon receipt of all company owned property, the employee will receive their final paycheck including any earned vacation pay, if applicable.

Cape Cod Grow Lab may terminate employment at any time for any reason. If an employee is terminated for a severe violation of policy they will be escorted from the premises immediately. Any personal property, plus their final paycheck including any earned vacation pay, if applicable, will be given to the employee upon receipt of all company owned property.

Cape Cod Grow Lab considers personnel files confidential. Any request for employment confirmation will be provided only with employment dates and positions held.

Severance

Cape Cod Grow Lab will not offer severance benefits for employees terminating employment for any reason.

Emergency Procedures

Cape Cod Grow Lab will implement a full set of emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies. See the “Emergency Preparedness” and “Health & Safety of Our Employees, the Public, and

the Environment” sections below for more information on the emergency and safety measures that will be implemented.

Disaster Plan

Before beginning operations, Cape Cod Grow Lab will draft and implement a full Disaster Plan to ensure preparedness in the event of any kind of emergency or natural disaster. This plan will include:

- Drafting an emergency contact list for every Cape Cod Grow Lab employee, including home and cell phone numbers.
- Creating an emergency preparedness kit and keeping it onsite, including adequate safety materials for a range of different emergency scenarios.
- Emergency scenarios contemplated will include: hurricanes, fire, tornado and other extreme weather situations, as well as a plan in case of an active shooter situation or robbery. More information and detailed plans can be found in Appendix.
- Consulting with Brewster and Massachusetts public safety officials about local notification systems, regional preparedness plans, and how to register for emergency notifications.
- Creating an evacuation plan and identifying a meeting place for Cape Cod Grow Lab employees in case an evacuation of the Cape Cod Grow Lab site is necessary.

Even if a disaster makes a total evacuation of the premises necessary, the Cape Cod Grow Lab facility will be designed to prevent any security or diversion hazards when the building is unattended.

Alcohol, Smoke, and Drug-Free Workplace Policy

Cape Cod Grow Lab will be an alcohol, smoke, and drug-free workplace with regard to all areas and activities on the premises. All Cape Cod Grow Lab employees will be informed of the business' restrictions on alcohol, smoking, and drug use during the training process, and will be made aware that violating these rules will be grounds for firing or disciplinary action.

Confidential Information

All business and other records will be kept in a secure, confidential manner on-site, as described in the "Record-Keeping" section of this application. Information will be made available for audits by state and local authorities where appropriate. We do not anticipate we will have any consumer or patient information because we will be selling as a wholesaler to retailers. Our Personnel information will be stored in a secure and confidential manner.

Policy for Dismissals

Cape Cod Grow Lab will enact a policy for the **immediate dismissal** of any marijuana establishment agent who has:

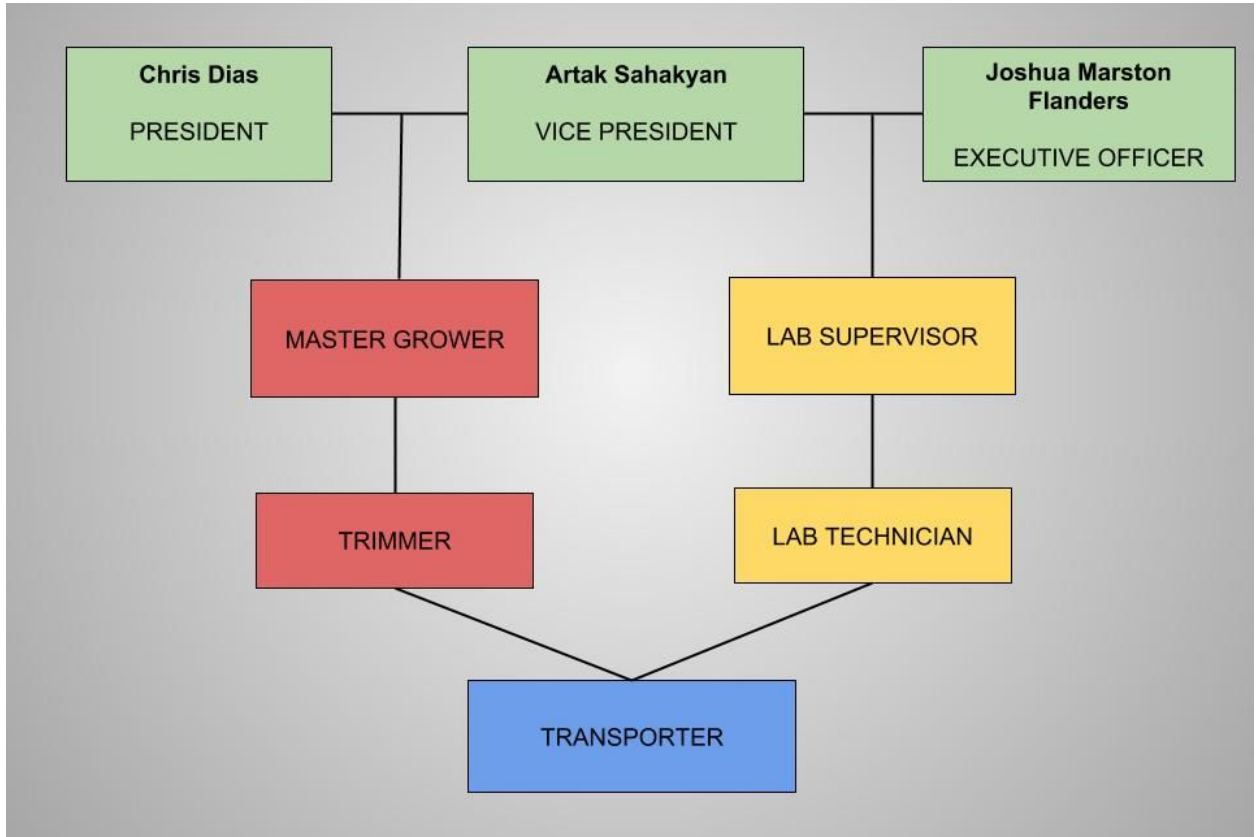
- Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
- Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
- Been convicted or entered a guilty plea, plea of nolo contendere, or 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.

All dismissals will take place immediately and be reported to law enforcement and the Commission as necessary.

Staffing Plan

To start, the employees and managers will be Chris, Artak and Josh. As the organization grows, we will hire a master grower, trimming technicians, and a master manufacturer and lab technician. Additionally, we will hire someone who will conduct transportation for the facility who can also help with other functions. We will also add additional hires as the outputs increase for both cultivation and manufacturing. Finally, we are committed to developing a diverse and inclusive workplace and more information on these policies can be found in our Diversity Plan.

Organizational Chart



Chris Dias – President

Chris is a business owner and 46 year Cape Cod resident. He has run Specialty Builders' Supply from Brewster for over 17 years. The company he started alone now has 35 employees and an additional location on Martha's Vineyard where he was born. Chris lived in Brewster for 16 years and recently moved to Orleans with his wife and daughter.

Artak Sahakyan - Vice President

Born in Armenia, Artak Sahakyan came to America in 2002 in search of a better life. Trained as a civil engineer, he pumped gas and washed dishes until he got an opportunity to enter the U.S. construction industry as a laborer and carpenter. Developing his English skills, he worked his way up in the industry and became a fixture of the community, starting a framing and remodeling business in 2004 and gaining American citizenship in 2012.

Today, Artak is the owner and operator of A&A Building and Remodeling Inc.,³⁵ a successful home remodeling business in Chatham with nearly 20 employees working in two office locations. A&A's territory covers Boston proper, all of Cape Cod and the Islands. The business continues to create new lists of services, and their client base has increased significantly as well.

Artak has been a resident of Massachusetts for many years. He has even been featured on *Home Again with Bob Vila* for one of his remodeling projects. Artak is also heavily involved in the local community and recently organized an event to protect and promote International Human Rights through the Armenian Church of Cape Cod. In 2017, seeing a need to help children retain their native speaking language, Artak launched the International Language and Mathematics School in Osterville. The school provides language and math instruction for children in grades K-6, offering Armenian, Portuguese, and Russian studies.

³⁵ A&A Building and Remodeling Inc., <http://aabuildingremodelingllc.com/>

Joshua Marston Flanders

Joshua is the owner of Flanders and Crew Inc., a general contracting company he started over 30 years ago on the island of Martha's Vineyard. Joshua moved to the island in the 1980s and started building homes, and he has a successful business based on quality and integrity. Joshua sees this new business opportunity as a chance to work with educated, creative professionals with the common goal of creating a quality company.

Cultivation Employees

Master Grower

Cape Cod Grow Lab will hire a Master Grower to direct and maintain the cultivation operation. The Master Grower will regulate the growth conditions of the canopy and vegetation rooms, administer pesticides, schedule appropriate harvesting of the flower, and process accordingly in the dry room. Furthermore, the Master Grower will supervise and train any and all trimmers employed by Cape Cod Grow Lab in compliance with the best cultivation practices available to agents of a Marijuana Establishment. Cape Cod Grow Lab will recruit an experienced horticulturist through a rigorous vetting process, designed to assess qualified candidates based on their specific interest and experience with dioecious flowering plants.

Trimming Technicians

Each trimmer hired by Cape Cod Grow Lab will undergo the same vetting process as the Master Grower, who will in turn assess the quality of each candidate. Cape Cod Grow Lab will conduct background checks on prospective trimmers and will hire for the position in strict compliance with the Cannabis Control Commission and M.G.L. c. 149. Cape Cod Grow Lab plans to hire a single dedicated trimmer to assist the Master Grower in propagating, maintaining, trimming, harvesting and processing each and every cannabis plant subject to the control of Cape Cod Grow Lab.

Manufacturing Employees

Lab Employees

Our Lab employees will be a Master Extractor and a Lab Technician. These employees will undergo the same background check requirements and personnel policies as all CCGL employees, in addition to manufacturing-specific training described in the “Qualifications & Training” section below.

Driver/Transporter Employees

Cape Cod Grow Lab will conduct background checks on prospective drivers and distributors and will hire for the position in strict compliance with the State Regulations.

Registration of Marijuana Establishment Agents

Cape Cod Grow Lab will apply for registration for all of its board members, directors, employees, executives, managers, and volunteers who are associated with the business. Upon being registered, each individual will carry a Commission-issued registration card. All registered individuals will be over 21 years old and will not have been convicted of an 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. Furthermore, their suitability for registration will be consistent with the provisions of 935 CMR 500.800 and 500.802.

When registering each new marijuana establishment agent, CCGL will include all information required by the Commission. This includes the applicant's full name, date of birth, and address of the individual, as well as any aliases. A government-issued ID (including driver's license or liquor purchase ID) issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission will also be submitted.

Each new employee will attest that they will not engage in the diversion of marijuana products, and will provide written acknowledgment of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth.

Disciplinary Background

Cape Cod Grow Lab will require prospective employee/agents to provide full descriptions of any criminal action under the laws of the Commonwealth, or another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, whether for a felony or misdemeanor and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts. The same applies to any civil or administrative action relating to a professional, occupational or fraudulent practices. Any past or pending denial, suspension, or revocation of a license or registration, or the denial of a renewal of a license or registration, for any type of business or profession must also be declared. This also applies to any past and pending disciplinary action or unresolved complaint with regard to any professional license or registration held by the prospective employee/agent.

CORI Background Checks

A Marijuana Establishment executive registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration, shall submit to the Commission a Criminal Offender Record Information (CORI) report and any other background check information required by the Commission for each individual for whom the Marijuana Establishment seeks a marijuana establishment agent registration, obtained within 30 days prior to submission.

Void Registration

Cape Cod Grow Lab will notify the Commission no more than one business day after a marijuana establishment agent ceases to be associated with the establishment. The registration shall be immediately void when the agent is no longer associated with the establishment.

Renewal

A registration card shall be valid for one year from the date of issue, and may be renewed on an annual basis upon a determination by the Commission that the applicant for renewal continues to be suitable for registration.

Stolen Registration

After obtaining a registration card for a marijuana establishment agent, a Marijuana Establishment is responsible for notifying the Commission, in a form and manner determined by the Commission within five business days of any changes to the information that the establishment was previously required to submit to the Commission or after discovery that a registration card has been lost or stolen.

Registration Possession

All marijuana establishment agents will carry the registration card associated with the appropriate Marijuana Establishment at all times while in possession of marijuana

products, including at all times while at the establishment or while transporting marijuana products.

Multiple Registrations

A marijuana establishment agent affiliated with multiple Marijuana Establishments will be registered as a marijuana establishment agent by each Marijuana Establishment and will be issued a registration card for each establishment.

Qualifications & Training

Marijuana Agents and Employees Will Receive Adequate Training

Cape Cod Grow Lab will ensure that all marijuana establishment agents complete adequate training prior to performing their respective job functions. Training will be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff members will receive eight hours of on-going training annually.

Maintenance of Financial Records

As required by state regulations, Cape Cod Grow Lab will keep a full set of business records. Given the difficulty in accessing bank accounts – because banks are FDIC insured and a conflict of law exists between Massachusetts law and Federal law – many of our transactions will use currency, which makes record-keeping a central part of our compliance program.

We will hire an outside accountant and employ a bookkeeper, whose roles will consist of tracking our finances while also maintaining our compliance with applicable statutes and regulations regarding the maintenance of financial records. We will develop robust internal policies to prevent any diversion of currency, develop strict record retention policies, and comply with all reporting requirements. Additionally, our employees will also be trained on the importance of financial record retention, and we will conduct periodic audits of our processes if necessary.

Cape Cod Grow Lab's financial records will include manual or computerized records of the business':

- Monthly Cash Flow Statements
- Federal, State, and Local Tax Returns
- Assets and Liabilities;
- Monetary Transactions;

- Books of Accounts, including 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, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment.
- Form W-4s
- Form I-9s
- Transport manifests for product transported and amount sold
- Receipts from Retailers who purchase our product
- Form 8300s filed with the IRS for cash transactions
- Any other financial documents recommended or required by law.

Each record maintained will include the following data:

- A unique identifier for each record (e.g., sequentially numbered alpha/numeric ID);
- A description of the record;
- The location of the record;
- Minimum retention time; and
- Directions for record disposition.

Finance records will be retained for no less than the period of time required by applicable statutes, regulations, and/or contractual requirements. Unless otherwise indicated, those records will be disposed of after their minimum retention time is attained.

FINANCIAL RECORDS – Proposed Retention schedule

Record Type	Retention Period
P&L Statements	7 Years
Tax Returns	7 years
8300 Forms	7 years
Receipts & Invoices	7 years

PAYROLL DOCUMENTS – Proposed Retention schedule

Record Type	Retention Period
Employee Deduction Authorizations	4 years after termination
Payroll Deductions	Termination + 7 years
W-2 and W-4 Forms	Termination + 7 years
Garnishments, Assignments, Attachments	Termination + 7 years

Labor Distribution Cost Records	7 years
Payroll Registers (gross and net)	7 years
Time Cards/Sheets	2 years
Unclaimed Wage Records	6 years

In conclusion, we understand the importance of a robust financial record retention policy and will develop processes and procedures that allow us to maintain full capability in these areas so that we can track and trace not only our product but all of our financial records both historical and current.

Waste Disposal Records

In addition to personnel, business, and other records, Cape Cod Grow Lab will keep waste disposal records as required under 935 CMR 500.105(12). For more information, see the “Marijuana Waste Record-Keeping” section above.

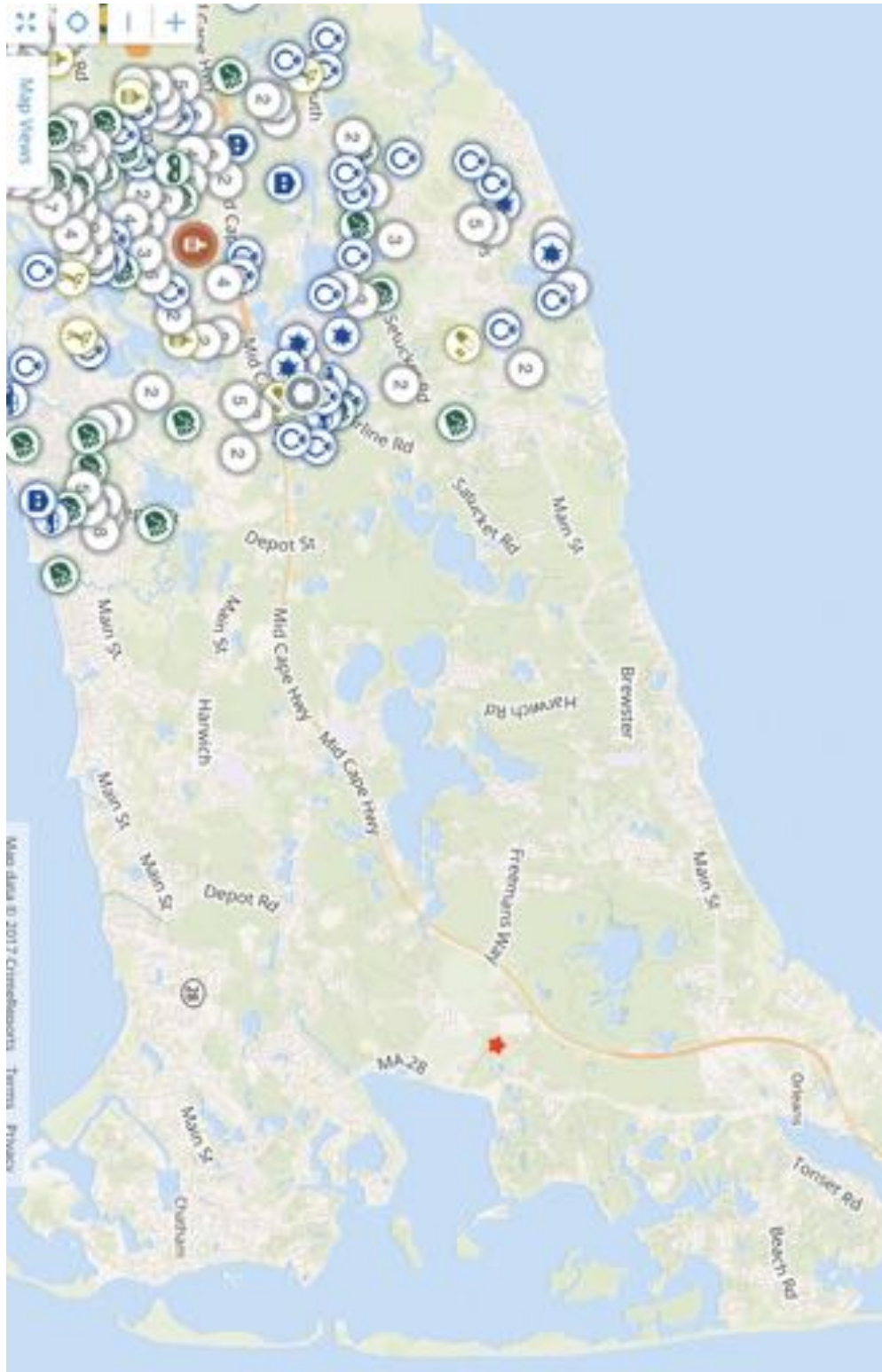
Post-Closure Records

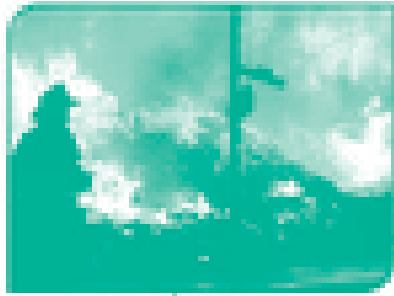
Following the closure of Cape Cod Grow Lab as a Marijuana Establishment, all records will be kept for at least two years at the expense of Cape Cod Grow Lab in a form and location acceptable to the Commission. The fund for winding down the business will include an adequate fund to maintain all records as required by state regulations.

Appendix A



Appendix B





What should employers do to protect workers from fire hazards?

Employers should train workers about fire hazards in the workplace and about what to do in a fire emergency. If you want your workers to evacuate, you should train them on how to escape. If you expect your workers to use firefighting equipment, you should give them appropriate equipment and train them to use the equipment safely. (See Title 29 of the *Code of Federal Regulations* Part 1910 Subparts E and L; and Part 1926 Subparts C and F.)

What does OSHA require for emergency fire exits?

Every workplace must have enough exits suitably located to enable everyone to get out of the facility quickly. Considerations include the type of structure, the number of persons exposed, the fire protection available, the type of industry involved, and the height and type of construction of the building or structure. In addition, fire doors must not be blocked or locked when employees are inside. Delayed opening of fire doors, however, is permitted when an approved alarm system is integrated into the fire door design. Exit routes from buildings must be free of obstructions and properly marked with exit signs. See 29 *CFR* Part 1910.36 for details about all requirements.

Do employers have to provide portable fire extinguishers?

No. But if you do, you must establish an educational program to familiarize your workers with the *general principles* of fire extinguisher use. If you expect your workers to use portable fire extinguishers, you must provide *hands-on training* in using this equipment. For details, see 29 *CFR* Part 1910 Subpart L.

Must employers develop emergency action plans?

Not every employer is required to have an emergency action plan. OSHA standards that require such plans include the following:

- Process Safety Management of Highly Hazardous Chemicals, 1910.119

- Fixed Extinguishing Systems, General, 1910.160
- Fire Detection Systems, 1910.164
- Grain Handling, 1910.272
- Ethylene Oxide, 1910.1047
- Methylenedianiline, 1910.1050
- 1,3 Butadiene, 1910.1051

When required, employers must develop emergency action plans that:

- Describe the routes for workers to use and procedures to follow.
- Account for all evacuated employees.
- Remain available for employee review.
- Include procedures for evacuating disabled employees.
- Address evacuation of employees who stay behind to shut down critical plant equipment.
- Include preferred means of alerting employees to a fire emergency.
- Provide for an employee alarm system throughout the workplace.
- Require an alarm system that includes voice communication or sound signals such as bells, whistles, or horns.
- Make the evacuation signal known to employees.
- Ensure emergency training.
- Require employer review of the plan with new employees and with all employees whenever the plan is changed.

Must employers have a fire prevention plan?

OSHA standards that require fire prevention plans include the following:

- Ethylene Oxide, 1910.1047
- Methylenedianiline, 1910.1050
- 1,3 Butadiene, 1910.1051

Employers covered by these standards must implement plans to minimize the frequency of evacuations. All fire prevention plans must:

- Be available for employee review.

- Include housekeeping procedures for storage and cleanup of flammable materials and flammable waste.
- Address handling and packaging of flammable waste. (Recycling of flammable waste such as paper is encouraged.)
- Cover procedures for controlling workplace ignition sources such as smoking, welding, and burning.
- Provide for proper cleaning and maintenance of heat producing equipment such as burners, heat exchangers, boilers, ovens, stoves, and fryers and require storage of flammables away from this equipment.
- Inform workers of the potential fire hazards of their jobs and plan procedures.
- Require plan review with all new employees and with all employees whenever the plan is changed.

What are the rules for fixed extinguishing systems?

Fixed extinguishing systems throughout the workplace are among the most reliable fire fighting tools. These systems detect fires, sound an alarm, and send water to the fire and heat. To meet OSHA standards employers who have these systems must:

- Substitute (temporarily) a fire watch of trained employees to respond to fire emergencies when a fire suppression system is out of service.
- Ensure that the watch is included in the fire prevention plan and the emergency action plan.
- Post signs for systems that use agents (e.g., carbon dioxide, Halon 1211, etc.) posing a serious health hazard.

How can you get more information on safety and health?

OSHA has various publications, standards, technical assistance, and compliance tools to help you, and offers extensive assistance through workplace consultation, voluntary protection programs, strategic partnerships, alliances, state plans, grants, training, and education. OSHA's *Safety and Health Program Management Guidelines* (*Federal Register* 54:3904–3916, January 26, 1989) detail elements critical to the development of a successful safety and health management system. This and other information are available on OSHA's website.

- For one free copy of OSHA publications, send a self-addressed mailing label to OSHA Publications Office, 200 Constitution Avenue, N.W., N-3101, Washington, DC 20210; or send a request to our fax at (202) 693–2498, or call us at (202) 693–1888.
- To order OSHA publications online at www.osha.gov, go to **Publications** and follow the instructions for ordering.
- To file a complaint by phone, report an emergency, or get OSHA advice, assistance, or products, contact your nearest OSHA office under the U.S. Department of Labor listing in your phone book, or call toll-free at (800) 321–OSHA (6742). The teletypewriter (TTY) number is (877) 889–5627.
- To file a complaint online or obtain more information on OSHA federal and state programs, visit OSHA's website.

This is one in a series of informational fact sheets highlighting OSHA programs, policies, or standards. It does not impose any new compliance requirements. For a comprehensive list of compliance requirements of OSHA standards or regulations, refer to *Title 29 of the Code of Federal Regulations*. This information will be made available to sensory-impaired individuals upon request. The voice phone is (202) 693–1999. See also OSHA's website at www.osha.gov.

Sample Written Program

for

Fire Prevention Plan

Provided as a public service by

OSHCON

Occupational Safety and Health Consultation Program

**Publication No. HS03-014A(7-03)
Revised 07/28/03**

1910.39 Fire Prevention Plan

The following fire prevention plan is provided only as a guide to assist employers and employees in complying with the requirements of the Occupational Safety and Health Administration's (OSHA) Fire Prevention Plan Standard, 29 Code of Federal Regulations (CFR) 1910.39, as well as to provide other helpful information. It is not intended to supersede the requirements of the standard. An employer should review the standard for particular requirements that are applicable to their individual situation, and make adjustments to this program that are specific to their company. An employer will need to add information relevant to their particular facility in order to develop an effective, comprehensive program.

**1910.39
Fire Prevention Plan
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Fire Prevention Plan
for
Company Name
Date

I. OBJECTIVE

The purpose of this Fire Prevention Plan is to eliminate the causes of fire, prevent loss of life and property by fire, and to comply with the Occupational Safety and Health Administration's (OSHA) standard on fire prevention, 29 CFR 1910.39. It provides employees with information and guidelines that will assist them in recognizing, reporting, and controlling fire hazards.

II. BACKGROUND

Company Name is committed to minimizing the threat of fire to employees, visitors, and property. *Company Name* complies with all applicable laws, regulations, codes, and good practices pertaining to fire prevention. *Company Name's* separate Emergency Action Plan spells out the procedures for responding to fires. This Fire Prevention Plan serves to reduce the risk of fires at *Company Name/Location* in the following ways:

- A. identifies materials that are potential fire hazards and their proper handling and storage procedures;
- B. distinguishes potential ignition sources and the proper control procedures of those materials;
- C. describes fire protection equipment and/or systems used to control fire hazards;
- D. identifies persons responsible for maintaining the equipment and systems installed to prevent or control ignition of fires;
- E. identifies persons responsible for the control and accumulation of flammable or combustible material;
- F. describes good housekeeping procedures necessary to insure the control of accumulated flammable and combustible waste material and residues to avoid a fire emergency; and
- G. provides training to employees with regard to fire hazards to which they may be exposed.

III. ASSIGNMENT OF RESPONSIBILITY

Fire safety is everyone's responsibility. All employees should know how to prevent and respond to fires, and are responsible for adhering to company policy regarding fire emergencies.

A. Management

Management determines the *Company Name* fire prevention and protection policies. Management will provide adequate controls to provide a safe workplace, and will provide adequate resources and training to its employees to encourage fire prevention and the safest possible response in the event of a fire emergency.

B. Plan Administrator

Responsible Person(s) shall manage the Fire Prevention Plan for **Company Name**, and shall maintain all records pertaining to the plan. The Plan Administrator shall also:

1. Develop and administer the **Company Name** fire prevention training program.
2. Ensure that fire control equipment and systems are properly maintained.
3. Control fuel source hazards.
4. Conduct fire risk surveys (see Appendix A) and make recommendations.

C. Supervisors

Supervisors are responsible for ensuring that employees receive appropriate fire safety training, and for notifying **Responsible Person** when changes in operation increase the risk of fire. Supervisors are also responsible for enforcing **Company Name** fire prevention and protection policies.

D. Employees

All employees shall:

1. Complete all required training before working without supervision.
2. Conduct operations safely to limit the risk of fire.
3. Report potential fire hazards to their supervisors.
4. Follow fire emergency procedures.

IV. PLAN IMPLEMENTATION

A. Good Housekeeping

To limit the risk of fires, employees shall take the following precautions:

1. Minimize the storage of combustible materials.
2. Make sure that doors, hallways, stairs, and other exit routes are kept free of obstructions.
3. Dispose of combustible waste in covered, airtight, metal containers.
4. Use and store flammable materials in well-ventilated areas away from ignition sources.
5. Use only nonflammable cleaning products.
6. Keep incompatible (i.e., chemically reactive) substances away from each other.
7. Perform “hot work” (i.e., welding or working with an open flame or other ignition sources) in controlled and well-ventilated areas.
8. Keep equipment in good working order (i.e., inspect electrical wiring and appliances regularly and keep motors and machine tools free of dust and grease).
9. Ensure that heating units are safeguarded.
10. Report all gas leaks immediately. **Responsible Person** shall ensure that all gas leaks are repaired immediately upon notification.

11. Repair and clean up flammable liquid leaks immediately.
12. Keep work areas free of dust, lint, sawdust, scraps, and similar material.
13. Do not rely on extension cords if wiring improvements are needed, and take care not to overload circuits with multiple pieces of equipment.
14. Ensure that required hot work permits are obtained.
15. Turn off electrical equipment when not in use.

B. Maintenance

Responsible Person(s) will ensure that equipment is maintained according to manufacturers' specifications. **Company Name** will also comply with requirements of the National Fire Protection Association (NFPA) codes for specific equipment. Only properly trained individuals shall perform maintenance work.

The following equipment is subject to the maintenance, inspection, and testing procedures:

1. equipment installed to detect fuel leaks, control heating, and control pressurized systems;
2. portable fire extinguishers, automatic sprinkler systems, and fixed extinguishing systems;
3. detection systems for smoke, heat, or flame;
4. fire alarm systems; and
5. emergency backup systems and the equipment they support.

V. TYPES OF HAZARDS

The following sections address the major workplace fire hazards at **Company Name's** facilities and the procedures for controlling the hazards.

A. Electrical Fire Hazards

Electrical system failures and the misuse of electrical equipment are leading causes of workplace fires. Fires can result from loose ground connections, wiring with frayed insulation, or overloaded fuses, circuits, motors, or outlets.

To prevent electrical fires, employees shall:

1. Make sure that worn wires are replaced.
2. Use only appropriately rated fuses.
3. Never use extension cords as substitutes for wiring improvements.
4. Use only approved extension cords [i.e., those with the Underwriters Laboratory (UL) or Factory Mutual (FM) label].
5. Check wiring in hazardous locations where the risk of fire is especially high.
6. Check electrical equipment to ensure that it is either properly grounded or double insulated.
7. Ensure adequate spacing while performing maintenance.

B. Portable Heaters

All portable heaters shall be approved by **Responsible Person**. Portable electric heaters shall have tip-over protection that automatically shuts off the unit when it is tipped over. There shall be adequate clearance between the heater and combustible furnishings or other materials at all times.

C. Office Fire Hazards

Fire risks are not limited to **Company Name's** industrial facilities. Fires in offices have become more likely because of the increased use of electrical equipment, such as computers and fax machines. To prevent office fires, employees shall:

1. Avoid overloading circuits with office equipment.
2. Turn off nonessential electrical equipment at the end of each workday.
3. Keep storage areas clear of rubbish.
4. Ensure that extension cords are not placed under carpets.
5. Ensure that trash and paper set aside for recycling is not allowed to accumulate.

D. Cutting, Welding, and Open Flame Work

Responsible Person(s) will ensure the following:

1. All necessary hot work permits have been obtained prior to work beginning.
2. Cutting and welding are done by authorized personnel in designated cutting and welding areas whenever possible.
3. Adequate ventilation is provided.
4. Torches, regulators, pressure-reducing valves, and manifolds are UL listed or FM approved.
5. Oxygen-fuel gas systems are equipped with listed and/or approved backflow valves and pressure-relief devices.
6. Cutters, welders, and helpers are wearing eye protection and protective clothing as appropriate.
7. Cutting or welding is prohibited in sprinklered areas while sprinkler protection is out of service.
8. Cutting or welding is prohibited in areas where explosive atmospheres of gases, vapors, or dusts could develop from residues or accumulations in confined spaces.
9. Cutting or welding is prohibited on metal walls, ceilings, or roofs built of combustible sandwich-type panel construction or having combustible covering.
10. Confined spaces such as tanks are tested to ensure that the atmosphere is not over ten percent of the lower flammable limit before cutting or welding in or on the tank.
11. Small tanks, piping, or containers that cannot be entered are cleaned, purged, and tested before cutting or welding on them begins.

12. Fire watch has been established.

E. Flammable and Combustible Materials

Responsible Person shall regularly evaluate the presence of combustible materials at **Company Name** (see Appendix D).

Certain types of substances can ignite at relatively low temperatures or pose a risk of catastrophic explosion if ignited. Such substances obviously require special care and handling.

1. Class A combustibles.

These include common combustible materials (wood, paper, cloth, rubber, and plastics) that can act as fuel and are found in non-specialized areas such as offices.

To handle Class A combustibles safely:

- a. Dispose of waste daily.
- b. Keep trash in metal-lined receptacles with tight-fitting covers (metal wastebaskets that are emptied every day do not need to be covered).
- c. Keep work areas clean and free of fuel paths that could allow a fire to spread.
- d. Keep combustibles away from accidental ignition sources, such as hot plates, soldering irons, or other heat- or spark-producing devices.
- e. Store paper stock in metal cabinets.
- f. Store rags in metal bins with self-closing lids.
- g. Do not order excessive amounts of combustibles.
- h. Make frequent inspections to anticipate fires before they start.

Water, multi-purpose dry chemical (ABC), and halon 1211 are approved fire extinguishing agents for Class A combustibles.

2. Class B combustibles.

These include flammable and combustible liquids (oils, greases, tars, oil-based paints, and lacquers), flammable gases, and flammable aerosols.

To handle Class B combustibles safely:

- a. Use only approved pumps, taking suction from the top, to dispense liquids from tanks, drums, barrels, or similar containers (or use approved self-closing valves or faucets).
- b. Do not dispense Class B flammable liquids into containers unless the nozzle and container are electrically interconnected by contact or by a bonding wire. Either the tank or container must be grounded.

- c. Store, handle, and use Class B combustibles only in approved locations where vapors are prevented from reaching ignition sources such as heating or electric equipment, open flames, or mechanical or electric sparks.
- d. Do not use a flammable liquid as a cleaning agent inside a building (the only exception is in a closed machine approved for cleaning with flammable liquids).
- e. Do not use, handle, or store Class B combustibles near exits, stairs, or any other areas normally used as exits.
- f. Do not weld, cut, grind, or use unsafe electrical appliances or equipment near Class B combustibles.
- g. Do not generate heat, allow an open flame, or smoke near Class B combustibles.
- h. Know the location of and how to use the nearest portable fire extinguisher rated for Class B fire.

Water should not be used to extinguish Class B fires caused by flammable liquids. Water can cause the burning liquid to spread, making the fire worse. To extinguish a fire caused by flammable liquids, exclude the air around the burning liquid. The following fire-extinguishing agents are approved for Class B combustibles: carbon dioxide, multi-purpose dry chemical (ABC), halon 1301, and halon 1211. (**NOTE:** Halon has been determined to be an ozone-depleting substance and is no longer being manufactured. Existing systems using halon can be kept in place.)

F. Smoking

Smoking is prohibited in all Company Name buildings. Certain outdoor areas may also be designated as no smoking areas. The areas in which smoking is prohibited outdoors are identified by NO SMOKING signs.

VI. TRAINING

Responsible Person shall present basic fire prevention training to all employees upon employment, and shall maintain documentation of the training, which includes:

- A. review of 29 CFR 1910.38, including how it can be accessed;
- B. this Fire Prevention Plan, including how it can be accessed;
- C. good housekeeping practices;
- D. proper response and notification in the event of a fire;
- E. instruction on the use of portable fire extinguishers (as determined by company policy in the Emergency Action Plan); and
- F. recognition of potential fire hazards.

Supervisors shall train employees about the fire hazards associated with the specific materials and processes to which they are exposed, and will maintain documentation of the training. Employees will receive this training:

- A. at their initial assignment;
- B. annually; and
- C. when changes in work processes necessitate additional training.

VII. PROGRAM REVIEW

Responsible Person shall review this Fire Prevention Plan at least annually for necessary changes.

Appendix B

Company Name General Fire Prevention Checklist

Use this checklist to ensure fire prevention measures conform with the general fire prevention requirements found in OSHA standards.

- Yes No Is the local fire department acquainted with your facility, its location, and specific hazards?
- Yes No If you have a fire alarm system, is it tested at least annually?
- Yes No If you have interior stand pipes and valves, are they inspected regularly?
- Yes No If you have outside private fire hydrants, are they on a routine preventive maintenance schedule and flushed at least once a year?
- Yes No Are fire doors and shutters in good operating condition?
- Yes No Are fire doors and shutters unobstructed and protected against obstructions, including their counterweights?
- Yes No Are automatic sprinkler system water control valves, air pressure, and water pressure checked weekly or periodically?
- Yes No Has responsibility for the maintenance of automatic sprinkler systems been assigned to an employee or contractor?
- Yes No Are sprinkler heads protected by metal guards?
- Yes No Is proper clearance maintained below sprinkler heads?
- Yes No Are portable fire extinguishers provided in adequate number and type?*
- Yes No Are fire extinguishers mounted in readily accessible locations?*
- Yes No Are fire extinguishers recharged regularly with the recharge date noted on an inspection tag?*
- Yes No Are employees periodically instructed in the use of extinguishers and fire protection procedures?*

*(NOTE: Use of fire extinguishers is based on company policy regarding employee fire fighting in your Emergency Action Plan and local fire code.)

Completed by: _____

Date: _____

Appendix C

Company Name Exits Checklist

Use this checklist to evaluate Company Name's compliance with OSHA's standard on emergency exit routes.

- Yes No Is each exit marked with an exit sign and illuminated by a reliable light source?
- Yes No Are the directions to exits, when not immediately apparent, marked with visible signs?
- Yes No Are doors, passageways, or stairways that are neither exits nor access to exits, and which could be mistaken for exits, marked "NOT AN EXIT" or other appropriate marking?
- Yes No Are exit signs provided with the word "EXIT" in letters at least five inches high and with lettering at least one inch wide?
- Yes No Are exit doors side-hinged?
- Yes No Are all exits kept free of obstructions?
- Yes No Are there at least two exit routes provided from elevated platforms, pits, or rooms where the absence of a second exit would increase the risk of injury from hot, poisonous, corrosive, suffocating, flammable, or explosive substances?
- Yes No Is the number of exits from each floor of a building and from the building itself appropriate for the building occupancy? (NOTE: Do not count revolving, sliding, or overhead doors when evaluating whether there are sufficient exits.)
- Yes No Are exit stairways that are required to be separated from other parts of a building enclosed by at least one-hour fire-resistant walls (or at least two-hour fire-resistant walls in buildings over four stories high)?
- Yes No Are the slopes of ramps used as part of emergency building exits limited to one foot vertical and 12 feet horizontal?
- Yes No Are glass doors or storm doors fully tempered, and do they meet the safety requirements for human impact?
- Yes No Can exit doors be opened from the direction of exit travel without the use of a key or any special knowledge or effort?
- Yes No Are doors on cold storage rooms provided with an inside release mechanism?

that will release the latch and open the door even if it's padlocked or otherwise locked on the outside?

- Yes No Where exit doors open directly onto any street, alley, or other area where vehicles may be operated, are adequate barriers and warnings provided to prevent employees from stepping into the path of traffic?

- Yes No Are doors that swing in both directions and are located between rooms where there is frequent traffic equipped with glass viewing panels?

Completed by: _____

Date: _____

Appendix D

Company Name Flammable and Combustible Material Checklist

Use this checklist to evaluate Company Name's compliance with OSHA's standards on flammable and combustible materials:

- Yes No Are combustible scrap, debris, and waste materials such as oily rags stored in covered metal receptacles and removed from the worksite promptly?
- Yes No Are approved containers and tanks used for the storage and handling of flammable and combustible liquids?
- Yes No Are all connections on drums and combustible liquid piping vapor and liquid tight?
- Yes No Are all flammable liquids kept in closed containers when not in use?
- Yes No Are metal drums of flammable liquids electrically grounded during dispensing?
- Yes No Do storage rooms for flammable and combustible liquids have appropriate ventilation systems?
- Yes No Are NO SMOKING signs posted on liquefied petroleum gas tanks?
- Yes No Are all solvent wastes and flammable liquids kept in fire-resistant covered containers until they are removed from the worksite?
- Yes No Is vacuuming used whenever possible rather than blowing or sweeping combustible dust?
- Yes No Are fuel gas cylinders and oxygen cylinders separated by distances or fire-resistant barriers while in storage?
- Yes No Are fire extinguishers appropriate for the materials in the areas where they are mounted?*
- Yes No Are appropriate fire extinguishers mounted within 75 feet of outside areas containing flammable liquids and within 10 feet of any inside storage area for such materials?*
- Yes No Are extinguishers free from obstruction or blockage?*
- Yes No Are all extinguishers serviced, maintained, and tagged at least once a year?*

- Yes No Are all extinguishers fully charged and in their designated places?*
- Yes No Where sprinkler systems are permanently installed, are the nozzle heads directed or arranged so that water will not be sprayed into operating electrical switchboards and equipment?
- Yes No Are NO SMOKING signs posted in areas where flammable or combustible materials are used or stored?
- Yes No Are safety cans utilized for dispensing flammable or combustible liquids at the point of use?
- Yes No Are all spills of flammable or combustible liquids cleaned up promptly?
- Yes No Are storage tanks adequately vented to prevent the development of an excessive vacuum or pressure that could result from filling, emptying, or temperature changes?

*(NOTE: Use of fire extinguishers is based on company policy regarding employee fire fighting in your Emergency Action Plan and local fire code.)

Completed by: _____

Date: _____

EMERGENCY ACTION PLAN

for

Facility Name: Cape Cod Grow
Lab _____

Facility Address: 1399 Freemans Way, Brewster,
MA _____

DATE PREPARED: ⁴2018²⁷ / _____

EMERGENCY PERSONNEL NAMES AND PHONE NUMBERS

DESIGNATED RESPONSIBLE OFFICIAL (Highest Ranking Manager at

Cape Cod Grow Lab site, such as President, _____, or _____):

Name: Chris Dias Phone: (508) 221-7705

EMERGENCY COORDINATOR:

Name: Artak Sahakyan Phone: (508) 280-7913

AREA/FLOOR MONITORS (If applicable):

Area/Floor: _____ Name: _____ Phone: (_____)

Area/Floor: _____ Name: _____ Phone: (_____)

ASSISTANTS TO PHYSICALLY CHALLENGED (If applicable):

Name: _____ Phone: (_____)

Name: _____ Phone: (_____)

Date 4/27/2018

EVACUATION ROUTES

- Evacuation route maps have been posted in each work area. The following information is marked on evacuation maps:
 1. Emergency exits
 2. Primary and secondary evacuation routes
 3. Locations of fire extinguishers
 4. Fire alarm pull stations' location
 - a. Assembly points

- Site personnel should know at least two evacuation routes.

EMERGENCY PHONE NUMBERS

FIRE DEPARTMENT: _____

PARAMEDICS: _____

AMBULANCE: _____

POLICE: _____

FEDERAL PROTECTIVE SERVICE: _____

SECURITY (If applicable): _____

BUILDING MANAGER (If applicable): _____

UTILITY COMPANY EMERGENCY CONTACTS

(Specify name of the company, phone number and point of contact)

ELECTRIC: _____

WATER: _____

GAS (if applicable): _____

TELEPHONE COMPANY: _____

Date: ___/___/___

EMERGENCY REPORTING AND EVACUATION PROCEDURES

Types of emergencies to be reported by site personnel are:

- MEDICAL
- FIRE
- SEVERE WEATHER
- BOMB THREAT
- CHEMICAL SPILL
- STRUCTURE CLIMBING/DESCENDING
- EXTENDED POWER LOSS
- OTHER (specify) _____
(e.g., terrorist attack/hostage taking)

MEDICAL EMERGENCY

- Call medical emergency phone number (check applicable):

- Paramedics
- Ambulance
- Fire Department
- Other

Provide the following information:

- a. Nature of medical emergency,
 - b. Location of the emergency (address, building, room number),
and
 - c. Your name and phone number from which you are calling.
- Do not move victim unless absolutely necessary.
 - Call the following personnel trained in CPR and First Aid to provide the required assistance prior to the arrival of the professional medical help:

Name: _____ Phone: _____

Name: _____ Phone: _____

- If personnel trained in First Aid are not available, as a minimum, attempt to provide the following assistance:
 1. Stop the bleeding with firm pressure on the wounds (note: avoid contact with blood or other bodily fluids).
 2. Clear the air passages using the Heimlich Maneuver in case of choking.
- In case of rendering assistance to personnel exposed to hazardous materials, consult the Material Safety Data Sheet (MSDS) and wear the appropriate personal protective equipment. Attempt first aid ONLY if trained and qualified.

Date ___/___/___

FIRE EMERGENCY

When fire is discovered:

- Activate the nearest fire alarm (if installed)
- Notify the local Fire Department by calling _____.
- If the fire alarm is not available, notify the site personnel about the fire emergency by the following means (check applicable):

- | | |
|--|--|
| <input type="checkbox"/> Voice Communication | <input type="checkbox"/> Radio |
| <input type="checkbox"/> Phone Paging | <input type="checkbox"/> Other (specify) |

Fight the fire ONLY if:

- The Fire Department has been notified.
- The fire is small and is not spreading to other areas.
- Escaping the area is possible by backing up to the nearest exit.
- The fire extinguisher is in working condition and personnel are trained to use it.

Upon being notified about the fire emergency, occupants must:

- Leave the building using the designated escape routes.
- Assemble in the designated area (specify location):
- Remain outside until the competent authority (Designated Official or designee) announces that it is safe to reenter.

Designated Official, Emergency Coordinator or supervisors must (underline one):

- Disconnect utilities and equipment unless doing so jeopardizes his/her safety.
- Coordinate an orderly evacuation of personnel.
- Perform an accurate head count of personnel reported to the designated area.
- Determine a rescue method to locate missing personnel.
- Provide the Fire Department personnel with the necessary information about the facility.
- Perform assessment and coordinate weather forecast office emergency closing procedures

Area/Floor Monitors must:

- Ensure that all employees have evacuated the area/floor.
- Report any problems to the Emergency Coordinator at the assembly area.

Assistants to Physically Challenged should:

- Assist all physically challenged employees in emergency evacuation.

Date ___ / ___ / ___

EXTENDED POWER LOSS

In the event of extended power loss to a facility certain precautionary measures should be taken depending on the geographical location and environment of the facility:

- Unnecessary electrical equipment and appliances should be turned off in the event that power restoration would surge causing damage to electronics and effecting sensitive equipment.
- Facilities with freezing temperatures should turn off and drain the following lines in the event of a long term power loss.
 - Fire sprinkler system
 - Standpipes
 - Potable water lines
 - Toilets
- Add propylene-glycol to drains to prevent traps from freezing
- Equipment that contain fluids that may freeze due to long term exposure to freezing temperatures should be moved to heated areas, drained of liquids, or provided with auxiliary heat sources.

Upon Restoration of heat and power:

- Electronic equipment should be brought up to ambient temperatures before energizing to prevent condensate from forming on circuitry.
- Fire and potable water piping should be checked for leaks from freeze damage after the heat has been restored to the facility and water turned back on.

CHEMICAL SPILL

The following are the locations of:

Spill Containment and Security Equipment: _____

Personal Protective Equipment (PPE):

MSDS: _____

When a Large Chemical Spill has occurred:

- Immediately notify the designated official and Emergency Coordinator.
- Contain the spill with available equipment (e.g., pads, booms, absorbent powder, etc.).
- Secure the area and alert other site personnel.
- Do not attempt to clean the spill unless trained to do so.
- Attend to injured personnel and call the medical emergency number, if required.
- Call a local spill cleanup company or the Fire Department (if arrangement has been made) to perform a large chemical (e.g., mercury) spill cleanup.

Name of Spill Cleanup Company: _____

Phone Number: _____

- Evacuate building as necessary

When a Small Chemical Spill has occurred:

- Notify the Emergency Coordinator and/or supervisor (select one).
- If toxic fumes are present, secure the area (with caution tapes or cones) to prevent other personnel from entering.
- Deal with the spill in accordance with the instructions described in the MSDS.
- Small spills must be handled in a safe manner, while wearing the proper PPE.
- Review the general spill cleanup procedures.

Date ___/___/___

STRUCTURE CLIMBING/DESCENDING EMERGENCIES

List structures maintained by site personnel (tower, river gauge, etc.):

No.	Structure Type	Location (address, if applicable)	Emergency Response Organization* (if available within 30-minute response time)

Emergency Response Organization(s):

Name _____ Phone Number _____

Name _____ Phone Number _____

(Attach Emergency Response Agreement if available)

* - N/A. If no Emergency Response Organization available within 30-minute response time additional personnel trained in rescue operations and equipped with rescue kit must accompany the climber(s).

TELEPHONE BOMB THREAT CHECKLIST

INSTRUCTIONS: BE CALM, BE COURTEOUS. LISTEN. DO NOT INTERRUPT THE CALLER.

YOUR NAME: _____ TIME: _____ DATE: _____
CALLER'S IDENTITY SEX: Male _____ Female _____ Adult _____ Juvenile _____ APPROXIMATE AGE: _____
ORIGIN OF CALL: Local _____ Long Distance _____ Telephone Booth _____

VOICE CHARACTERISTICS	SPEECH	LANGUAGE
<input type="checkbox"/> Loud	<input type="checkbox"/> Fast	<input type="checkbox"/> Excellent
<input type="checkbox"/> High Pitch	<input type="checkbox"/> Distinct	<input type="checkbox"/> Fair
<input type="checkbox"/> Raspy	<input type="checkbox"/> Stutter	<input type="checkbox"/> Foul
<input type="checkbox"/> Intoxicated	<input type="checkbox"/> Slurred	<input type="checkbox"/> Good
<input type="checkbox"/> Soft	<input type="checkbox"/> Slow	<input type="checkbox"/> Poor
<input type="checkbox"/> Deep	<input type="checkbox"/> Distorted	<input type="checkbox"/> _____
<input type="checkbox"/> Pleasant	<input type="checkbox"/> Nasal	<input type="checkbox"/> Other
<input type="checkbox"/> _____	<input type="checkbox"/> _____	
Other	Other	
ACCENT	MANNER	BACKGROUND NOISES
<input type="checkbox"/> Local	<input type="checkbox"/> Calm	<input type="checkbox"/> Factory
<input type="checkbox"/> Foreign	<input type="checkbox"/> Rational	<input type="checkbox"/> Machines
<input type="checkbox"/> Race	<input type="checkbox"/> Coherent	<input type="checkbox"/> Music
<input type="checkbox"/> Not Local	<input type="checkbox"/> Angry	<input type="checkbox"/> Office
<input type="checkbox"/> Region	<input type="checkbox"/> Irrational	<input type="checkbox"/> Machines
	<input type="checkbox"/> Coherent	<input type="checkbox"/> Street
	<input type="checkbox"/> Deliberate	<input type="checkbox"/> Traffic
	<input type="checkbox"/> Righteous	<input type="checkbox"/> Trains
	<input type="checkbox"/> Laughing	<input type="checkbox"/> Animals
		<input type="checkbox"/> Quiet
		<input type="checkbox"/> Voices
		<input type="checkbox"/> Airplanes
		<input type="checkbox"/> Party
		<input type="checkbox"/> Atmosphere

BOMB FACTS

PRETEND DIFFICULTY HEARING - KEEP CALLER TALKING - IF CALLER SEEMS AGREEABLE TO FURTHER CONVERSATION, ASK QUESTIONS LIKE:

When will it go off? Certain Hour _____ Time Remaining _____

Where is it located? Building _____ Area _____

What kind of bomb? _____

What kind of package? _____

How do you know so much about the bomb? _____

What is your name and address? _____

If building is occupied, inform caller that detonation could cause injury or death.

Activate malicious call trace: Hang up phone and do not answer another line. Choose same line and dial *57 (if your phone system has this capability). Listen for the confirmation announcement and hang up.

Call Security at _____ and relay information about call.

Did the caller appear familiar with plant or building (by his/her description of the bomb location)? Write out the message in its entirety and any other comments on a separate sheet of paper and attach to this checklist.

Notify your supervisor immediately.

SEVERE WEATHER AND NATURAL DISASTERS

Tornado:

- When a warning is issued by sirens or other means, seek inside shelter. Consider the following:
 - Small interior rooms on the lowest floor and without windows,
 - Hallways on the lowest floor away from doors and windows, and
 - Rooms constructed with reinforced concrete, brick, or block with no windows.
- Stay away from outside walls and windows.
- Use arms to protect head and neck.
- Remain sheltered until the tornado threat is announced to be over.

Earthquake:

- Stay calm and await instructions from the Emergency Coordinator or the designated official.
- Keep away from overhead fixtures, windows, filing cabinets, and electrical power.
- Assist people with disabilities in finding a safe place.
- Evacuate as instructed by the Emergency Coordinator and/or the designated official.

Flood:

If indoors:

- Be ready to evacuate as directed by the Emergency Coordinator and/or the designated official.
- Follow the recommended primary or secondary evacuation routes.

If outdoors:

- Climb to high ground and stay there.
- Avoid walking or driving through flood water.
- If car stalls, abandon it immediately and climb to a higher ground.

Hurricane:

- The nature of a hurricane provides for more warning than other natural and weather disasters. A hurricane watch is issued when a hurricane becomes a threat to a coastal area. A hurricane warning is issued when hurricane winds of 74 mph or higher, or a combination of dangerously high water and rough seas, are expected in the area within 24 hours.

Once a hurricane watch has been issued:

- Stay calm and await instructions from the Emergency Coordinator or the designated official.
- Moor any boats securely, or move to a safe place if time allows.
- Continue to monitor local TV and radio stations for instructions.
- Move early out of low-lying areas or from the coast, at the request of officials.
- If you are on high ground, away from the coast and plan to stay, secure the building, moving all loose items indoors and boarding up windows and

openings.

- Collect drinking water in appropriate containers.

Once a hurricane warning has been issued:

- Be ready to evacuate as directed by the Emergency Coordinator and/or the designated official.
- Leave areas that might be affected by storm tide or stream flooding.

During a hurricane:

- Remain indoors and consider the following:
 - Small interior rooms on the lowest floor and without windows,
 - Hallways on the lowest floor away from doors and windows, and
 - Rooms constructed with reinforced concrete, brick, or block with no windows.

Blizzard:

If indoors:

- Stay calm and await instructions from the Emergency Coordinator or the designated official.
- Stay indoors!
- If there is no heat:
 - Close off unneeded rooms or areas.
 - Stuff towels or rags in cracks under doors.
 - Cover windows at night.
- Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.
- Wear layers of loose-fitting, light-weight, warm clothing, if available.

If outdoors:

- Find a dry shelter. Cover all exposed parts of the body.
- If shelter is not available:
 - Prepare a lean-to, wind break, or snow cave for protection from the wind.
 - Build a fire for heat and to attract attention. Place rocks around the fire to absorb and reflect heat.
 - Do not eat snow. It will lower your body temperature. Melt it first.

If stranded in a car or truck:

- Stay in the vehicle!
- Run the motor about ten minutes each hour. Open the windows a little for fresh air to avoid carbon monoxide poisoning. Make sure the exhaust pipe is not blocked.
- Make yourself visible to rescuers.
 - Turn on the dome light at night when running the engine.
 - Tie a colored cloth to your antenna or door.
 - Raise the hood after the snow stops falling.
- Exercise to keep blood circulating and to keep warm.

CRITICAL OPERATIONS

During some emergency situations, it will be necessary for some specially assigned personnel to remain at the work areas to perform critical operations.

Assignments:

Work Area	Name	Job Title	Description of Assignment

- Personnel involved in critical operations may remain on the site upon the permission of the site designated official or Emergency Coordinator.
- In case emergency situation will not permit any of the personnel to remain at the facility, the designated official or other assigned personnel shall notify the appropriate _____ offices to initiate backups. This information can be obtained from the Emergency Evacuation Procedures included in the _____ Manual.

The following offices should be contacted:

Name/Location: _____

Telephone Number: _____

Name/Location: _____

Telephone Number: _____

Name/Location: _____

Telephone Number: _____

Qualifications & Training

Marijuana Agents and Employees Will Receive Adequate Training

Cape Cod Grow Lab will ensure that all marijuana establishment agents complete adequate training prior to performing their respective job functions. Training will be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff members will receive eight hours of on-going training annually.

Completion of Responsible Vendor Training for Owners, Managers, Employees:

Maintenance of Records: Annual Re-Certification

On or after July 1, 2019, all current owners, managers and employees of a Marijuana Establishment that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, shall have attended and successfully completed a responsible vendor program to be designated a “responsible vendor.” Once a licensee is designated a “responsible vendor,” all new employees involved in the handling and sale of marijuana for adult use shall successfully complete a responsible vendor program within 90 days of hire.

After initial successful completion of a responsible vendor program, each owner, manager, and employee involved in the handling and sale of marijuana for adult use shall successfully complete the program once every year thereafter to maintain designation as a “responsible vendor.” Administrative employees who do not handle or sell marijuana may take the “responsible vendor” program on a voluntary basis.

Marijuana establishments must maintain records of responsible vendor training program compliance for four years and make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

Minimum Requirements of Training

The training Cape Cod Grow Lab employees receive will meet and exceed the minimum training requirements presented by the state. Topics covered will include:

- Discussion concerning marijuana's effect on the human body. Training shall include:
 - Marijuana's physical effects based on type of marijuana product;
 - The amount of time to feel impairment;
 - Visible signs of impairment; and
 - Recognizing the signs of impairment.
- Diversion prevention and prevention of sales to minors, including best practices;
- Compliance with all tracking requirements; and
- Acceptable forms of identification. Training shall include:
 - How to check identification;
 - Spotting false identification;
 - Medical registration cards issued by the DPH;
 - Provisions for confiscating fraudulent identifications; and
 - Common mistakes made in verification.
- Other key state laws and rules affecting owners, managers, and employees, which shall include:
 - Local and state licensing and enforcement;
 - Incident and notification requirements;
 - Administrative and criminal liability;
 - License sanctions and court 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.

Qualifications

To begin, our manufacturing operation will hire a Master Extractor and extraction technicians. Ideally, all of these hires will have experience working with cannabis, although work in other industrial sectors creates skills that can transfer to cannabis extraction.

Master Extractor

A Master Extractor is an expert in the extraction process, with a chemistry background and several years of experience in the cannabis space. The Cape Cod Grow Lab Master Extractor will oversee the extraction process and train extraction techs and other manufacturing employees in the proper use of extraction systems.

Essential Functions:

- Supervision of the extraction facility
- Preparation of equipment and plant materials for extraction
- Execution of extraction and processing in accordance with state and local standards
- Operation of sophisticated extraction equipment
- Ensure consistency and efficiency of product through quality control testing and procedures

- Cleaning and maintenance of extraction equipment and manufacturing facility
- Maintaining strict inventory records of all plant materials, chemicals, and equipment used in the facility
- Operating, maintaining, and making adjustments and repairs to extraction equipment
- Storing supplies and equipment and disposal of waste according to guidelines
- Complete the cleaning and sanitization of all production equipment, work surfaces, and tools
- Maintaining inventory records of supplies, materials, and equipment and preparing requisitions as needed
- Maintaining material safety data sheets for all chemicals and products
- Following all standard operating procedures regarding product creation and lab safety
- Assist in packaging and labeling of finished products
- Works with testing laboratory as defined by state guidelines

Lab Techs

The extraction laboratory technician (one to begin, with the potential to hire more as the Cape Cod Grow Lab manufacturing operation expands) will maintain the organization, cleanliness and efficiency of production area and maintain quality control measures to ensure high quality product. They will also carry out day-to-day tasks including prepping, extracting, and packaging.

Essential Functions:

- Responsible for maintaining an organized and safe environment.
- Cleaning and maintenance of extraction equipment and manufacturing facility.
- Promote a work environment that is positive, productive, and compliant with established policies and procedures.
- Operating, maintaining, and making adjustments and repairs to extraction equipment
- Ensure consistency and efficiency of product through quality control testing and procedures.

- Maintaining inventory records of supplies, materials, and equipment and preparing requisitions as needed.

Manufacturing Training

All Cape Cod Grow Lab manufacturing employees will be taught how to process marijuana safely. All employees will be provided with safety training at the outset, as well as a Compliance Manual and Best Operating Practices Manual. Lab techs and other new employees will be led by our Master Extractor, who will be hired as the operation begins its volatile extraction activity. The Master Extractor will share his/her expertise on cannabis processing and safety procedures. This expertise will allow for employees to advance their knowledge and provide them with opportunities to build careers as experts in cannabis manufacturing. We will internally provide employees with advancement opportunities and bonuses based on performance.

Employees will be trained through a “task-process.” They will begin by doing all of the different tasks in the manufacturing process and once an employee is adequately trained in every task of the manufacturing process, the Master Extractor will train the employee on how every task of the process affects the other, and provide the employee with adequate knowledge and feedback to be able to manufacture medical marijuana in accordance with Good Manufacturing Practices. This training will provide employees with adequate experience and a career path in the medical marijuana industry. Moreover, it allows us to have a built in process that allows for advancement: starting

the the task training they will learn every part of the manufacturing process and eventually will be able to manage an entire workflow or facility.

Skills taught to our Lab Techs will include the following:

- Operating a cannabis volatile extraction machine.
- How to create products and extracts using BHO Closed Loop, Distillate, Short Path.
- The process of extracting cannabis with volatile compounds such as butane.
- Experience formulating and processing vape oil, vape cartridges, rosin, bubble hash, wax, shatter, and other concentrate products.
- Ability to establish priorities, work independently, anticipate issues before they arise, proactively resolve problems and deliver results in a fast-paced environment.
- Knowledge of the cannabis industry.

Protective Equipment

Cape Cod Grow Lab is committed to making employee safety one of its top priorities. The employees involved will have sufficient protective gear provided for them at all times, including boots, coveralls, gloves, and masks. We will also train our employees on how to wear protective gear and how to properly remove protective gear and store it at the end of the workday.

The operation will initially purchase this protective gear, and will purchase additional protective gear if and when needed. Cape Cod Grow Lab will also be installing exhaust fans for added safety, fire suppression sprinklers, flammable gas sensors with an alarm, volatile gas sensors with an alarm, and fire extinguishers. Furthermore, Cape Cod Grow Lab will obtain liability insurance which would apply in the case of any injuries or accidents.

The protective gear that workers will be required to wear in the volatile butane manufacturing operation is as follows:

- Normal ballistic gear or uniforms as outer clothing with some fire resistance desirable.
- Tyvek coveralls designed to reduce accidental spills and to enable decontamination upon leaving.
- Chemical resistant clothing.
- Water resistant and puncture resistant non-slip boots.
- Gloves that are chemical resistant and waterproof (nitrile gloves may work well in most situations).
- An N-95 or P-100 disposable respirator or a ½ face respirator with P-100 cartridges.
- The use of a 3 chemical detector capable of detecting carbon monoxide, low oxygen, and explosive environments will also be recommended.

Hazardous Materials Handling & Training

The only potentially hazardous materials stored or used at the Cape Cod Grow Lab facility will be the butane used for manufacturing, as well as OSHA-certified, safe

pesticides used in the cultivation process. The manufacturing process will be performed within a dedicated room that is fully enclosed, with no other equipment within the room that is not associated with the extraction process except for an approved eye wash station.

Smoking, open flames, and direct fired heating devices will be prohibited from the extraction area. Openings and penetrations into the extraction room shall only be provided for egress, mechanical, electrical, or plumbing systems serving the extraction room, and any penetrations, shall be sealed vapor tight.

During the extraction process, the extraction equipment is a closed system and does not release any gas. After the extraction process has completed, the spent plant material and product are removed from the equipment.

Butane and any other flammable materials will be stored in a manner fully compliant with state and local fire regulations. Any containers, cylinders, or tanks containing flammable materials will not be exposed to high temperatures exceeding 125 degrees F and marked and stored upright, with areas used for their storage, use, and handling secured against unauthorized access and physical damage. All gas containers will be separated from hazardous conditions including combustible materials, extreme temperatures, falling objects, and sources of ignition. Transfer of gases between containers, cylinders and tanks shall be performed by qualified personnel using approved equipment and operating procedures.

A hazardous exhaust system inside the extraction booth will continuously operate when any flammable liquids or gases are in the extraction room. The exhaust vent will be located within 12 inches of the floor, and the location of the exhaust and inlet air openings will be located to provide air movement across all portions of the room. Exhaust air will vent directly outdoors, and will not be recirculated to occupied areas. Exhausted air will be expelled at least 10 feet from operable exterior windows and doors. Fresh ventilation air will be separated by at least 10 feet from any outdoor gas storage areas. The exhaust fan will be listed for hazardous exhaust duty and will be of aluminum construction, and spark resistant.

Compliance Manual Outline

Occupational Safety and Health Act (OSHA)

Cape Cod Grow Lab's goal is to provide a workplace free from serious recognized hazards, consistent with the general duty clause of the OSHA Act.³⁷ A Compliance Manual will be provided to all Cape Cod Grow Lab's employees at the start of employment outlining the procedure to report workplace injuries, accidents and illness. Training will also be conducted for compliance by all onboarding new employees. Finally, we will conduct an annual compliance audit in addition to regular monitoring to ensure we are meeting the standards for strict compliance.

³⁷ 29 U.S. Code § 654, Pub. L. 91-596, §5, 84 Stat. 1593 (December 29 1970), <https://www.gpo.gov/fdsys/pkg/USCODE-2011-title29/pdf/USCODE-2011-title29-chap15-sec654.pdf>

Injury & Illness Recordkeeping Procedure

Cape Cod Grow Lab will provide all employees with a Compliance Manual outlining Cape Cod Grow Lab's Injury and Illness Recordkeeping Procedure, consistent with OSHA's Injury and Illness Recordkeeping requirement. Specifically, the Compliance Manual will contain Cape Cod Grow Lab's reporting procedure; it will notify employees that they have the right to report work-related injuries and illnesses; and it will notify employees that Cape Cod Grow Lab is prohibited from discharging or discriminating against employees for reporting work-related injuries or illnesses.

Equipment Training

Cape Cod Grow Lab will provide training for employees so that they can continue to learn about the medical cannabis industry and continue to develop their skills. Every precaution will be taken so that all employees will use only safe tools and equipment, both in the production of edibles and in the extraction process.

Safety Policies & Programs

Cape Cod Grow Lab's goal is to create and maintain a safety-conscious culture in the workplace. The operation will establish an injury and illness recordkeeping procedure, maintain all records of work-related illnesses and injuries, and include Cape Cod Grow Lab's anti-retaliation policy in the Compliance Manual.

Emergency Preparedness

Cape Cod Grow Lab's goal is to provide employees with a place of employment free from recognized hazards that are likely to cause death or serious physical harm.³⁸ In addition to the preventative measures included in the other sections, Cape Cod Grow Lab will be equipped with portable fire extinguishers and an automatic fire detection system. A fire prevention plan will be placed on the premises. The plan will be in writing, and will be made available to employees in the employee handbook and Compliance Manual. Our business will ensure that all exit routes are maintained, safeguarded, and operate properly.

Health & Safety of Our Employees and the Public

The manufacturing of cannabis on the Cape Cod Grow Lab premises will at all times be operated in a way as to ensure the health, safety, and welfare of the public, employees of the business, visitors to the area, neighboring properties, and consumers. In order to ensure the security of the cannabis products being manufactured and to safeguard against the diversion of cannabis, the Cape Cod Grow Lab Compliance Manual will address all of these areas in depth. Additionally, Employees will be required to wear protective gear at all times.

³⁸ Occupational Safety and Health Act (OSHA), 29 U.S.Code § 654(a)(1).

Employee Safety Protocol

Cape Cod Grow Lab will train all employees on fire safety and pesticides and raw materials handling (pertaining to cultivation) with every new hire or every year, actively refreshing this safety training every year. Employees will be properly educated on fire safety rules and escape routes should there be a fire or any other emergency situation.

Operation Will Prevent Contamination of Marijuana Products

Cape Cod Grow Lab will establish and implement written procedures that will prevent any source of microbial contamination presenting a reasonable threat of contamination to cannabis products, contact surfaces, or packaging materials. In keeping with 105 CMR 590.00 from the DPH and the 1999 Food Code, these procedures will call for proper implementation of handwashing, the use of gloves, and prohibiting employees who are diagnosed with an infectious agent - specified under 105 CMR 590.003(C)(5) through (14) - from entering the workplace during infection or illness.

Hand Washing

Cape Cod Grow Lab will provide hand-washing facilities designed to ensure that an employee's hands do not pose a source of contamination to cannabis products, cannabis product-contact surfaces, or cannabis product-packaging materials. Toilet facilities will be adequate, convenient, and furnish running water at of at least 100° F

(30° C). Employees will be trained to wash their hands regularly before and after handling cannabis products in order to prevent contamination. All bathrooms will contain notices that employee handwashing is required.

Use of Gloves and Facemasks

Cape Cod Grow Lab is committed to making employee safety one of its top priorities. The employees involved in product manufacturing will have sufficient protective gear provided for them at all times, including boots, coveralls, gloves, and masks.

Prohibiting Employees Who Are Showing Signs of Illness

Cape Cod Grow Lab will establish and implement written procedures that will ensure that if there is ever a circumstance in which an employee is diagnosed by a medical professional or appears to have an illness, the situation will be properly taken care of in order to avoid any threat of contamination to any cannabis products. All employees who show any of the above-mentioned signs will be required to report such health conditions to their supervisors. The supervisors will be required to exclude the employee from any activities until his or her health condition is corrected.

Employees with Open Wounds / Sores / Skin Infections Will Be Prohibited From The Workplace During Infection or Illness

This will also apply to any person who by medical examination or supervisory observation is shown to have, or appears to have, any open lesions, or any health

condition that may contaminate any cannabis products. Cape Cod Grow Lab will require that any employee who has any open lesion (such as boils, sores, or infected wounds), or any other source of microbial contamination presenting a reasonable threat of contamination to cannabis products, contact surfaces, or packaging materials, be excluded from any related operations until his or her health condition is corrected.

Record-Keeping

Records of the Cape Cod Grow Lab Marijuana Establishment will be available for inspection by the Commission upon request. All records will be maintained in accordance with generally accepted accounting principles. Written records that will be kept and will be subject to inspection include, but will not necessarily be limited to, all records required in any section of state regulations,³⁹ in addition to the business' written operating procedures, inventory records, and seed-to-sale tracking records for all marijuana products (as described in the relevant sections of this application).

Personnel Records

Cape Cod Grow Lab will keep records of the job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions. Additionally, Cape Cod Grow Lab will keep a personnel record for each marijuana establishment agent. Such records will be maintained for at least 12 months

³⁹ Cannabis Control Commission, Massachusetts Regulation #1361 (23 April, 2018), 935 CMR 500.000

Record-Keeping

Records of the Cape Cod Grow Lab Marijuana Establishment will be available for inspection by the Commission upon request. All records will be maintained in accordance with generally accepted accounting principles. Written records that will be kept and will be subject to inspection include, but will not necessarily be limited to, all records required in any section of state regulations,¹ in addition to the business' written operating procedures, inventory records, and seed-to-sale tracking records for all marijuana products (as described in the relevant sections of this application).

Personnel Records

Cape Cod Grow Lab will keep records of the job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions. Additionally, Cape Cod Grow Lab will keep a personnel record for each marijuana establishment agent. Such records will be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment 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;

¹ Cannabis Control Commission, Massachusetts Regulation #1361 (23 April, 2018), 935 CMR 500.000

- 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; and
- Notice of completed responsible vendor and eight-hour related duty training.

Background Check Reports

All background check reports obtained for the business' employees and marijuana establishment agents will be kept along with the CCGL personnel records.

Quality Control & Testing Procedures

All Marijuana Products Will Be Tested

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

Quality Control and Contaminant Testing

Cape Cod Grow Lab will implement various procedures to ensure quality control over all cultivated and manufactured marijuana products as well as procedures for testing for potential contaminants.

All of our product including flower, pre-rolls, vape cartridges, and extract will be tested before it reaches any consumers. No marijuana product, including marijuana, will be sold or otherwise marketed by Cape Cod Grow Lab that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

The testing of marijuana products, including clones, will be performed by an Independent Testing Laboratory in compliance with the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products, as amended in November, 2016, published by the DPH.

Furthermore, the testing of environmental media (e.g., soils, solid growing media, and water) will be performed in compliance with the Protocol for Sampling and Analysis

of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries published by the DPH.

Independent Testing Laboratory

Cape Cod Grow Lab will work with an Independent Testing Laboratory licensed by the Commission and is accredited to the International Organization for Standardization by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Cooperation mutual recognition arrangement or that is otherwise approved by the Commission; is independent financially from any Registered Marijuana Dispensary (“RMD”), Marijuana Establishment or licensee for which it conducts a test; and is qualified to test cannabis or marijuana in compliance with 935 CMR 500.160 and M.G.L. c. 94C, § 34.

Cape Cod Grow Lab will comply with 935 CMR 500.105(13) during the transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services. Cape Cod Grow Lab, LLC will work to ensure that the storage of marijuana at the laboratory providing marijuana testing services will comply with 935 CMR 500.105(11).

Handling of Cannabis

Marijuana Will Be Handled in a Safe and Sanitary Manner

Cape Cod Grow Lab will process all marijuana in a safe and sanitary manner. The business will process the leaves and flowers of the female marijuana plant only, which will be:

- Well cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area.

Sanitary Requirements

As a marijuana establishment, Cape Cod Grow Lab will comply with the following sanitary requirements:

- Any employee whose job includes contact with marijuana or non-edible marijuana products, including cultivation, production, or packaging, will be subject to the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements;
- Any employee working in direct contact with preparation of marijuana or non-edible marijuana products will conform to sanitary practices while on duty, including maintaining adequate personal cleanliness and 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.

- Hand-washing facilities will be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities will be located in the Cape Cod Grow Lab 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.
- Unique laboratory coats will be mandated for each room of cultivation (and subsequent manufacturing) activity. This will ensure there is no cross contamination between batches of flower, clones and seedlings, and will facilitate pest management.
- There will be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
- Litter and waste will be properly removed, 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);
- Floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
- There will be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;

- Buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
- 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;
- All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;
- The Cape Cod Grow Lab water source (groundwater well) will be sufficient for necessary operations. If any additional private water source is used, it will be capable of providing a safe, potable, and adequate supply of water to meet the facility's needs;
- Plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the facility. Plumbing will properly convey sewage and liquid disposable waste from the premises. There will be no cross-connections between the potable and wastewater lines;
- Cape Cod Grow Lab will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;

- Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and
- Storage and transportation of finished products will be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.

Additionally, all 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).

Sanitary Water Supply

The Cape Cod Grow Lab facility will be equipped with adequate sanitary accommodations. The water supply will be adequate for the operations intended and derived from an adequate source. Any water that contacts cannabis products, cannabis product-contact surfaces, or cannabis product-packaging materials will be safe and of adequate sanitary quality. Running water at a suitable temperature, and under pressure as needed, will be provided in all areas where required for the processing of cannabis products, for the cleaning of equipment, utensils, and cannabis product-packaging materials, and/or for employee sanitary facilities. The plumbing systems will be of adequate size and design and will be adequately installed and maintained so that

adequate quantities are carried through the facility, sewage and liquid waste are properly conveyed, unsanitary conditions and contamination is avoided, adequate floor drainage is in all areas where floors are subject to flooding, and there is not backflow from, or cross-connection between, piping systems that discharge wastewater or sewage, and piping systems that carry water for cannabis products. Sewage will be disposed of into an adequate sewerage system or through other adequate means.

Employees will have adequate, readily accessible toilet facilities in the form of one unisex bathroom. Toilet facilities will be kept clean and will not pose a potential source of contamination of cannabis products, cannabis product- contact surfaces, or cannabis product-packaging materials. There will be hand-washing facilities designed to ensure that an employee's hands do not pose a source of contamination to cannabis products, cannabis product-contact surfaces, or cannabis product-packaging materials. Toilet facilities will be adequate, convenient, and furnish running water at of at least 100° F (30° C). Rubbish will be conveyed, stored, and disposed of so as to minimize the development of odor, minimize the potential that waste will attract, harbor, or otherwise contribute to for the breeding of pests, and protect against the contamination of cannabis products, cannabis product-contact surfaces, cannabis product-packaging materials, water supplies, and ground surfaces.

Business Will Comply With Sanitary Requirements

As a marijuana establishment, Cape Cod Grow Lab will comply with sanitary requirements. All marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation

Standards for Food Establishments. See the “Sanitary Requirements” section above for more information.

Business Will Prevent Deterioration of Cannabis Goods

All cannabis goods will be stored in a secure area on the Cape Cod Grow Labs premises. Cannabis goods will not be exposed to sunlight or outside contaminants, and the Cape Cod Grow Labs storage area will be protected from extreme temperatures and humidity. All packaging of cannabis goods will be adequate to prevent the products from deteriorating in the interval before they are used or sold.

Cannabis Goods Will Be Properly Packaged and Labeled

All cannabis goods will meet the State specifications for quality assurance. All labels showing cannabinoid content and contaminants will be consistent with the standards for analysis as required by law. Packaging of all products will comply with all relevant packaging laws. All products will have tamper-resistant packaging. The packaging of all products will be clearly recognized to show the packaging has not been opened or tampered with. We will ensure the weight and count of all cannabis batches are consistent with records and labels. Scales used to weigh cannabis products will be consistent with all specified requirements.

Excess Marijuana

All excess marijuana will be disposed of in compliance with 935 CMR 500.105(12), either by an Independent Testing Laboratory returning excess marijuana to the source Cape Cod Grow Lab for disposal or by the Independent Testing Laboratory disposing of it directly. Further, no marijuana product will be sold or otherwise marketed by Cape Cod Grow Lab, LLC 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.

Contaminants Policy

Cape Cod Grow Lab will draft a written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the Department of Public Health protocols identified in 935 CMR 500.160. This policy will include notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification will be sent from both Cape Cod Grow Lab and the independent testing laboratory, separately and directly. The notification from Cape Cod Grow Lab, LLC will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

Compliance Documentation

Cape Cod Grow Lab will provide documentation of its compliance with the testing requirements of 935 CMR 500.160. Cape Cod Grow Lab, LLC will comply with 935 CMR 500.105(13) during the transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services. Cape Cod Grow Lab will maintain the results of all testing for no less than one year.

Diversity Plan

Executive Summary

Cape Cod Grow Lab will be committed to implementing best practices to recruit and retain a diverse team. Cape Cod Grow Lab will be an equal opportunity business. We plan to promote equity, actively recruiting minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation in the operation of the Marijuana Establishment. Cape Cod Grow Lab's hiring and personnel practices will reflect this commitment to diversity. Additionally, Cape Cod Grow Lab will create a plan to positively impact nearby areas disproportionately impacted by the effects of the War on Drugs in Wareham. We respect and value diverse life experiences and heritages and ensure that all voices are valued and heard.

We're committed to modeling diversity and inclusion for the entire cannabis industry of the nonprofit sector, and to maintaining an inclusive environment with equitable treatment for all.

To provide informed, authentic leadership for cultural equity, Cape Cod Grow Lab strives to:

- See diversity, inclusion, and equity as connected to our mission and critical to ensure the well-being of our staff and the communities we serve.
- Acknowledge and dismantle any inequities within our policies, systems, programs, and services, and continually update and report organization progress.

- Explore potential underlying, unquestioned assumptions that interfere with inclusiveness.
- Advocate for and support board-level thinking about how systemic inequities impact our organization's work, and how best to address that in a way that is consistent with our mission.
- Help to challenge assumptions about what it takes to be a strong leader at our organization, and who is well-positioned to provide leadership.
- Practice and encourage transparent communication in all interactions.
- Commit time and resources to expand more diverse leadership within our board, staff, committee, and advisory bodies.
- Lead with respect and tolerance. We expect all employees to embrace this notion and to express it in workplace interactions and through everyday practices.

Cape Cod Grow Lab abides by the following action items to help promote diversity and inclusion in our workplace:

- Pursue cultural competency throughout our organization by creating substantive learning opportunities and formal, transparent policies.
- Generate and aggregate quantitative and qualitative research related to equity
- to make incremental, measurable progress toward the visibility of our diversity, inclusion, and equity efforts. Once the content is curated it will be added to our website so others can access.
- Improve our cultural leadership pipeline by creating and supporting programs and policies that foster leadership that reflects the diversity of American society.

- Pool resources and expand offerings for underrepresented constituents by connecting with other cannabis organizations committed to diversity and inclusion efforts.
- Develop and present sessions on diversity, inclusion, and equity to provide information and resources internally, and to members, the community, and the cannabis industry.
- Develop a system for being more intentional and conscious of bias during the hiring, promoting, or evaluating process. Train our hiring team on equitable practices.
- Include a salary range with all public job descriptions.
- Advocate for public and private-sector policy that promotes diversity, inclusion, and equity. Challenge systems and policies that create inequity, oppression and disparity.

Implementing CCGL's Diversity Plan

Our founding team consists of Chris Dias, who is a veteran, and Artak Sahakyan. Artak emigrated to Massachusetts from the Republic of Armenia over fifteen years ago. We hope to set a precedent for other businesses hoping to incorporate marginalized groups into their workforce. The Armenian Genocide is still not recognized in all 50 States (Mississippi and Alabama are yet to acknowledge it), and the subsequent diaspora has brought a steady stream of immigrant communities from the Republic of Armenia. Unbeknownst to many, there are currently over half a million Armenian

Americans living in the U.S. today, a notable portion of whom reside in Massachusetts. While we develop our business and our team, Cape Cod Grow Lab's current membership also act as the "Diversity Committee", for the sake of building internal goals regarding diversity of employment.

Cape Cod Grow Lab is passionate about cannabis and is also passionate about rectifying the damage that persecution of cannabis has caused to communities of color in Massachusetts. While Brewster, MA, is demographically white, we understand the historical importance of promoting inclusive work opportunities for every American citizen, in particular those identified as minorities or women under Massachusetts law. We hope new businesses like our own can foster more diversity growth in our community.

Initial Assessment

Cape Cod Grow Lab will build knowledge through needs assessments or a cultural audit, and identify issues and themes that relate to diversity. A comprehensive needs assessment will gather data about interpersonal behavior, organizational culture and systems that impact people. The findings of various audits and assessments can be used to develop a strategic plan to address diversity-related concerns.

Once a strategic planning process is underway, outcomes of the assessment can inform the planning process. The Diversity Committee will plan and oversee the needs assessments and/or audit, and take responsibility for developing a revised diversity plan

based on the findings. Managers should have input and be prepared to communicate plans to their respective departments and to help build commitment. To conduct an initial assessment, Cape Cod Grow Lab will:

1. Engage the services of an experienced consultant.
2. Conduct a needs assessment or cultural audit among staff, board members and constituents of the organization.
3. Audit organizational demographics, systems, policies and procedures.
4. Determine priorities within the context of the strategic plan and a realistic timeline, considering resources such as staff time and ongoing operations.
5. Set relevant, pragmatic and achievable goals for bringing about organizational diversity. Articulate expected outcomes and measures of change.
6. Use meeting agendas, newsletters, memos and other forms of communication to publicize the diversity process and accomplishments of the initiative to date and to outline the next steps.

Our Diversity Plan will feature interventions at the following levels: recruitment, interviewing, hiring, and mentoring. In terms of recruitment, we will use the best practices outlined in a 2013 University of California, Berkeley study¹ as a guide and will make good faith efforts to recruit a diverse team using these methodologies:

- **Advertising for Diversity**
 - Advertise with professional organizations

¹ https://diversity.berkeley.edu/sites/default/files/recruiting_a_more_diverse_workforce_uhs.pdf

- Ask Professional organizations for names of potential candidates
- Include affirmative action policy or statement in advertisement
- **Target Recruitment Activities to Underrepresented Populations**
 - Discuss hiring goals with the hiring manager
 - Include ways in which the work would help underrepresented populations
 - Partner with minority-serving institutions in the area to develop a recruiting pipeline
 - Attend job fairs at local community, junior and four year colleges that serve underrepresented populations.
 - Ask existing staff speak or guest lecture at classes at local community colleges that serve underrepresented populations
 - Provide opportunities for potential candidates to get a sense of the diversity of the team
 - Create a diverse recruiting and/or hiring team
 - Personalize recruitment; call applicants and follow up.
 - Reach out and find candidates. Use the internet and social media tools to find competitive candidates.
 - Recruit continuously - not only when there are openings.
 - Maintain a file of resumes and contact information for potential candidates from underrepresented groups.
- **On the Job Mentorships and Career Ladders**
 - Increase and publicise the ability for advancement

- Provide information on training and mentorship opportunities
- Create career development and mentorship opportunities within the organization
- Offer compensation (and other benefits) for participation in diversity recruiting and community outreach efforts including participation in conferences, and coalitions related to diversity.
- **Demonstrating an Organizational Commitment to Diversity**
 - Make Cape Cod Grow Lab's commitment to diversity public
 - Integrate elements of diversity, equity, and inclusion into management performance reviews and professional development plans
 - Review policies that affect work/life balance

We will provide diversity training of all employees so as to ensure that all employees feel the Business Premises to be both professional and a safe space. We will establish a line of communication in which employees may address problems they face at work.

Cape Cod Grow Lab is passionate about helping women and people of color in the cannabis industry. We will provide training and actively recruit female and minority employees. We will also ensure that all employees are considered for promotion regardless of their gender, sexuality, race, or ethnicity. We also plan on hiring employees who are residents of the neighborhood and who are Brewster residents or live near Freemans Way. Finally, we will make an active effort to engage and educate

the community through mentorship programs and other educational outreach measures. By following the well-researched best practices that have emerged for recruiting a diverse workforce, we will ensure that our commitment to diversity results in a diverse and inclusive workplace. Additionally, we will hold ourselves accountable to our commitment by developing specific and measurable diversity and inclusion goals to chart our progress as we begin building out our facility and our team.

Local Employment Leader

As over 51% of Cape Cod Grow Lab's executives have lived in Massachusetts for over 12 months, and the company plans to primarily hire employees that fit this criterion, we hope to establish ourselves as a Local Employment Leader as defined by 935 CMR 500.040.

Ongoing Assessment

Individuals at all levels of our organization may become involved through education and training programs, while diversity committee members continue to review existing policies and procedures as they relate to diversity. As more individuals are involved, communication efforts can be enhanced. Cape Cod Grow Lab's protocol for assessing the development of our diversity strategy will be to:

1. Call upon skillful consultants to implement activities and place diversity efforts within the context of the total organization.
2. Seek ongoing feedback from participants as a way to refine the relevance of

activities and monitor overall progress.

3. Anticipate reactions and issues that will surface and have guidelines in place to address them.
4. Use a variety of strategies to communicate about the diversity process, while reinforcing the connection of diversity activities to the larger goals and mission of the company.
5. Establish committees with representatives from different areas of the organization to review policies and practices that relate to diversity concerns.

Diversity Specialist

Artak Sahakyan will be Cape Cod Grow Lab's Diversity Specialist and plans to bring a broad and objective perspective to the task of evaluation. His familiarity and experience with the cannabis industry's history could yield results more effectively.

While Artak may take the lead in evaluation, the Diversity Committee should give direction to the consultant and remain actively involved throughout the process. The Diversity Committee will direct the consultant to:

1. Use a comprehensive approach to evaluate individual change as well as changes in organizational systems. Gather data through multiple methods and from multiple sources.
2. Identify barriers and enablers to achieving diversity and inclusion to help guide subsequent efforts.
3. Communicate findings throughout the organization to build knowledge and

understanding.

Measure and Disseminate Outcomes

Cape Cod Grow Lab pledges to make a good faith effort to have 20% diverse employees. We define diversity as the state does and we additionally take into account LGBTQ, and first generation immigrants as “diverse.”

Outcomes such as increased representation of identified groups and improved employee survey scores will be recorded. Other measurements, such as improved employee retention, and public recognition, such as employer awards or social media accolades, would also demonstrate the quality of diversity and inclusion initiatives. As diversity training is implemented to increase retention, participant retention will be tracked over time, and participants can be surveyed to determine if training was a factor, and how much so, in their continued employment.

The results of our initiatives will be communicated at all levels to demonstrate the return on investment and value-add to Cape Cod Grow Lab as an organization. Communication tools will include infographics for senior leadership meetings and public affairs, memos to staff, and company website videos for potential candidates.

As diversity and inclusion initiatives are not static, ongoing reviews of our workforce and responses to changing needs are necessary. Cape Cod Grow Lab will establish procedures for periodic review of the diversity and inclusion initiatives and

goals. After a diversity initiative has been implemented for a period of time, we shall resurvey employees regarding their perceptions of the company's efforts.

Cape Cod Grow Lab, LLC
MP281446
MPR243513

Manufacture License Renewal Request for Additional Information

5. Operating Policies and Procedures

Hours of Operation

Once we commence operations, Cape Cod Grow Lab proposes to have the below hours of operation:

Monday	8am - 7pm
Tuesday	8am - 7pm
Wednesday	8am - 7pm
Thursday	8am - 7pm
Friday	8am - 7pm
Saturday	Closed
Sunday	Closed