



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR282232
Original Issued Date: 01/15/2020
Issued Date: 01/14/2021
Expiration Date: 01/16/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Four Daughters Compassionate Care, Inc.

Phone Number: 224-622-8770

Email Address: james@verano.holdings

Business Address 1: 11 Richards Road

Business Address 2:

Business City: Plymouth

Business State: MA

Business Zip Code: 02360

Mailing Address 1: 415 N. Dearborn St.

Mailing Address 2: 4th Floor

Mailing City: Chicago

Mailing State: IL

Mailing Zip Code: 60654

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: yes

Priority Applicant Type: RMD Priority

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number: RPA201864

RMD INFORMATION

Name of RMD: Four Daughters Compassionate Care, Inc.

Department of Public Health RMD Registration Number:

Operational and Registration Status: Obtained Provisional Certificate of Registration only

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership:

Percentage Of Control:

Role: Executive / Officer

Other Role:

First Name: Darren

Last Name: Weiss

Suffix:

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of Capital Provided: \$9000000 Percentage of Initial Capital: 100

Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Business Interest in Other State 1

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

Owner First Name: Verano Holdings, Owner Last Name:

Owner Suffix:

LLC

Entity Legal Name: Nature X

Entity DBA: Zen Leaf Vegas

Entity Description: Medical and adult-use dispensary

Entity Phone: 702-462-6706

Entity Email:

info@zenleafvegas.com

Entity Website: zenleafvegas.com

Entity Address 1: 9120 W. Post Road, Suite 103

Entity Address 2:

Entity City: Las Vegas

Entity State: NV

Entity Zip Code: 89148

Entity Country: USA

Entity Mailing Address 1: 415 N. Dearborn Ave, 4th Floor

Entity Mailing Address 2:

Entity Mailing City: Chicago

Entity Mailing State: IL

Entity Mailing Zip Code:

60654

Entity Mailing Country:

USA

Business Interest in Other State 2

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

Owner First Name: Verano

Owner Last Name:

Owner Suffix:

Holdings, LLC

Entity Legal Name: Ataraxia, LLC

Entity DBA: Ataraxia Grow & Labs

Entity Description: Medical cultivation and manufacturing.

Entity Phone: 847-322-9002

Entity Email:

garchos@ataraxiamm.com

Entity Website: ataraxiamm.com

Entity Address 1: 884 Industrial Blvd.

Entity Address 2:

Entity City: Albion

Entity State: IL

Entity Zip Code: 62806

Entity Country: USA

Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor

Entity Mailing Address 2:

Entity Mailing City: Chicago

Entity Mailing State: IL

Entity Mailing Zip Code:

60654

Entity Mailing Country:

USA

Business Interest in Other State 3

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

Owner First Name: Verano

Owner Last Name:

Owner Suffix:

Holdings, LLC

Entity Legal Name: NH Medicinal Dispensaries, LLC

Entity DBA: The Clinic Effingham

Entity Description: Medical dispensary

Entity Phone: 217-727-7715

Entity Email:

effingham@clinicillinois.com

Entity Website: clinicillinois.com

Entity Address 1: 1011 Ford Avenue, Suite C

Entity Address 2:

Entity City: Effingham

Entity State: IL

Entity Zip Code: 62401

Entity Country: USA

Entity Mailing Address 1: 415 N. Dearborn St. 4th Floor

Entity Mailing Address 2:

Entity Mailing City: Chicago

Entity Mailing State: IL

Entity Mailing Zip Code:

60654

Entity Mailing Country:

USA

Business Interest in Other State 4

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

Owner First Name: Verano Holdings, **Owner Last Name:** **Owner Suffix:**
LLC

Entity Legal Name: Healthway Services of West Illinois **Entity DBA:** Zen Leaf St. Charles

Entity Description: Medical dispensary

Entity Phone: 630-377-7373 **Entity Email:** **Entity Website:** zenleafil.com
info@zenleafil.com

Entity Address 1: 3714 Illinois Avenue **Entity Address 2:**

Entity City: St. Charles **Entity State:** IL **Entity Zip Code:** 60174 **Entity Country:** USA

Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor **Entity Mailing Address 2:**

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** **Entity Mailing Country:**
60654 USA

Business Interest in Other State 5**Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner**

Owner First Name: Verano Holdings, **Owner Last Name:** **Owner Suffix:**
LLC

Entity Legal Name: Mother Grows Best, LLC **Entity DBA:**

Entity Description: Medical cultivation and manufacturing

Entity Phone: 847-414-0373 **Entity Email:** **Entity Website:** veranobrands.com
info@veranobrands.com

Entity Address 1: Steinway Blvd SE **Entity Address 2:** Lot 5

Entity City: Canton **Entity State:** OH **Entity Zip Code:** 44707 **Entity Country:** USA

Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor **Entity Mailing Address 2:**

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** **Entity Mailing Country:**
60654 USA

Business Interest in Other State 6**Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner**

Owner First Name: Verano Holdings, **Owner Last Name:** **Owner Suffix:**
LLC

Entity Legal Name: Mother Knows Best, LLC **Entity DBA:**

Entity Description: Medical dispensary

Entity Phone: 847-414-0373 **Entity Email:** **Entity Website:**
sammy@verano.holdings

Entity Address 1: Steinway Blvd SE **Entity Address 2:** Lot 5

Entity City: Canton **Entity State:** OH **Entity Zip Code:** 44707 **Entity Country:** USA

Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor **Entity Mailing Address 2:**

Entity Mailing City: Chicago **Entity Mailing State:** IL **Entity Mailing Zip Code:** **Entity Mailing Country:**
60654 USA

Business Interest in Other State 7**Business Interest of an Owner or the Marijuana Establishment: Business Interest of an Owner**

Owner First Name: Verano Holdings, **Owner Last Name:** **Owner Suffix:**
LLC

Entity Legal Name: Ohio Grown Therapies, LLC **Entity DBA:** Zen Leaf Newark

Entity Description: Medical dispensary			
Entity Phone: 847-414-0373		Entity Email: sammy@verano.holdings	
Entity Address 1: 1246 N. 21st		Entity Website:	
Entity City: Newark	Entity State: OH	Entity Address 2:	Entity Zip Code: 43055
Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor		Entity Country: USA	
Entity Mailing Address 2:		Entity Mailing Zip Code:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 8

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

Owner First Name: Verano Holdings, LLC		Owner Last Name:		Owner Suffix:	
Entity Legal Name: Canna Cuzzos		Entity DBA: Zen Leaf Waldorf			
Entity Description: Medical dispensary					
Entity Phone: 833-936-5323		Entity Email: info@zenleafmd.com		Entity Website: zenleafmd.com	
Entity Address 1: 2290 Old Washington Road		Entity Address 2:			
Entity City: Waldorf	Entity State: MD	Entity Zip Code: 20601	Entity Country: USA		
Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor		Entity Mailing Address 2:			
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA		

Business Interest in Other State 9

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

Owner First Name: Verano Holdings, LLC		Owner Last Name:		Owner Suffix:	
Entity Legal Name: Maryland Natural Treatment Solutions, LLC		Entity DBA: Zen Leaf Glen Burnie			
Entity Description: Medical dispensary					
Entity Phone: 833-936-5323		Entity Email: info@zenleafmd.com		Entity Website: zenleafmd.com	
Entity Address 1: 00 Street Unknown		Entity Address 2:			
Entity City: Unknown City	Entity State: MD	Entity Zip Code: 00000	Entity Country: USA		
Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor		Entity Mailing Address 2:			
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA		

Business Interest in Other State 10

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

Owner First Name: Verano Holdings, LLC		Owner Last Name:		Owner Suffix:	
Entity Legal Name: Mikran, LLC		Entity DBA: Zen Leaf Germantown			
Entity Description: Medical dispensary					
Entity Phone: 833-936-5323		Entity Email: info@zenleafmd.com		Entity Website: zenleafmd.com	
Entity Address 1: 13007 Wisteria Drive		Entity Address 2:			

Entity City: Germantown	Entity State: MD	Entity Zip Code: 20874	Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 11

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

Owner First Name: Verano Holdings, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Lone Mountain Partners		Entity DBA: Verano Brands	
Entity Description: Medical and adult-use cultivation, manufacturing and distribution.			
Entity Phone: 913-488-3938	Entity Email: info@veranobrands.com	Entity Website: veranobrands.com	
Entity Address 1: 2900 E. Lone Mountain Road		Entity Address 2:	
Entity City: North Las Vegas	Entity State: NV	Entity Zip Code: 89081	Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

Business Interest in Other State 12

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

Owner First Name: Verano Holdings, LLC	Owner Last Name:	Owner Suffix:	
Entity Legal Name: Freestate Wellness, LLC		Entity DBA: Zen Leaf Jessup	
Entity Description: Medical cultivation and dispensary.			
Entity Phone: 833-936-5323	Entity Email: info@zenleafmd.com	Entity Website: zenleafmd.com	
Entity Address 1: 7221 Montevideo Road		Entity Address 2:	
Entity City: Jessup	Entity State: MD	Entity Zip Code: 20794	Entity Country: USA
Entity Mailing Address 1: 415 N. Dearborn Street, 4th Floor		Entity Mailing Address 2:	
Entity Mailing City: Chicago	Entity Mailing State: IL	Entity Mailing Zip Code: 60654	Entity Mailing Country: USA

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 11 Richards Road	
Establishment Address 2:	
Establishment City: Plymouth	Establishment Zip Code: 02360
Approximate square footage of the establishment: 6000	How many abutters does this property have?: 11
Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?: Yes	

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload
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				Date
Plan to Remain Compliant with Local Zoning	PLAN FOR LOCAL COMPLIANCE - Plymouth.pdf	pdf	5c719e44c4b7a71b66d129b0	02/23/2019
Certification of Host Community Agreement	Plymouth HCA Certification.pdf	pdf	5c9bc06f5d4b0b1b3ebc453c	03/27/2019
Community Outreach Meeting Documentation	Plymouth Community Outreach Attestation.pdf	pdf	5c9bc13c5fd63c1b24eb966b	03/27/2019

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.: \$9426

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Other	Four Daughters ELEVATE letter 4.18.19.pdf	pdf	5cba1fa0f25dae4c6c3f1ab6	04/19/2019
Other	Four Daughters letter re EON donation .pdf	pdf	5d1515d850e7af1803c21ce8	06/27/2019
Plan for Positive Impact	Positive Impact Plan - Four Daughters Plymouth.pdf	pdf	5d49dc296614633871924e81	08/06/2019

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Other Role:
 First Name: George Last Name: Archos Suffix:
 RMD Association: RMD Manager
 Background Question: yes

Individual Background Information 2

Role: Other Role:
 First Name: Samuel Last Name: Dorf Suffix:
 RMD Association: RMD Manager
 Background Question: yes

Individual Background Information 3

Role: Other Role:
 First Name: Darren Last Name: Weiss Suffix:
 RMD Association: RMD Manager
 Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Investor/Contributor Other Role:
 Entity Legal Name: Verano Holdings, LLC Entity DBA:
 Entity Description: Verano Holdings, LLC is a multi-state cannabis operator.

Phone: 847-414-0373 Email: info@veranobrands.com

Primary Business Address 1: 415 N. Dearborn Street, 4th Floor Primary Business Address 2:

Primary Business City: Chicago Primary Business State: IL Principal Business Zip Code: 60654

Additional Information:

Entity Background Check Information 2

Role: Parent Company Other Role:

Entity Legal Name: Verano Four Daughters Holdings, LLC Entity DBA:

Entity Description: Holding company

Phone: 847-414-0373 Email: info@verano.holding

Primary Business Address 1: 214 West Ohio Street Primary Business Address 2:

Primary Business City: Chicago Primary Business State: IL Principal Business Zip Code: 60654

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing 2-8.pdf	pdf	5c6ae78f5d4b0b1b3ebbf47c	02/18/2019
Bylaws	Bylaws.pdf	pdf	5c6f4e3c8d16491b5c0f7dcc	02/21/2019
Articles of Organization	Articles of Conversion.pdf	pdf	5c6f4e3eedbb73122a616730	02/21/2019
Department of Revenue - Certificate of Good standing	Dept of Revenue Certificate of Good Standing.pdf	pdf	5c6f4e41c4b7a71b66d12756	02/21/2019
Articles of Organization	RFI Responses MOP Plymouth - Articles of Org.pdf	pdf	5c9d114bb411c1126cf0725f	03/28/2019

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	11A_Four Daughters Compassionate Care, Inc. - MA Good Standing Cert 10-16-2020.pdf	pdf	5fa976da57d9d707ee4d841a	11/09/2020
Department of Revenue - Certificate of Good standing	11B_Four Daughters_Certificate of Good Standing_10.05.2020.pdf	pdf	5fa976e7dd2d7407bedebdd0	11/09/2020
Department of Unemployment Assistance - Certificate of Good standing	11C_Four Daughters_DUA_Certificate of Good Standing_10.19.2020.pdf	pdf	5fa976ec5b823307b79b6aa1	11/09/2020

Massachusetts Business Identification Number: 001342887

Doing-Business-As Name: Zen Leaf Plymouth

DBA Registration City: Plymouth

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
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Plan for Liability Insurance	Liability Insurance - Plymouth.pdf	pdf	5c7184ac3d84de123a611202	02/23/2019
Proposed Timeline	PLYMOUTH Proposed Timeline RFI Response.pdf	pdf	5c9d0d95eadf341230f6bf4b	03/28/2019
Business Plan	PLYMOUTH Business Plan RFI Response To Be Uploaded.pdf	pdf	5c9d0db53183181258e1f548	03/28/2019
Business Plan	RFI Responses Plymouth Business Plan.pdf	pdf	5c9d0e29c4b7a71b66d1704a	03/28/2019

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Dispensing procedures	Dispensing Procedures - Plymouth.pdf	pdf	5c7184df9ff0081b4821a386	02/23/2019
Prevention of diversion	Prevention of Diversion - Plymouth.pdf	pdf	5c7184e01e71bd126232b34b	02/23/2019
Security plan	Security Plan - Plymouth.pdf	pdf	5c7184e12724e81b5255b371	02/23/2019
Inventory procedures	Inventory Procedures - Plymouth.pdf	pdf	5c718518c4b7a71b66d12998	02/23/2019
Maintaining of financial records	Maintenance of Financial Records - Plymouth.pdf	pdf	5c718519eadf341230f6782f	02/23/2019
Personnel policies including background checks	Personnel Policies including background checks - Plymouth.pdf	pdf	5c71851a5fd63c1b24eb5199	02/23/2019
Plan for obtaining marijuana or marijuana products	Plan for Obtaining Marijuana or Marijuana Products - Plymouth.pdf	pdf	5c71851b3d84de123a611206	02/23/2019
Qualifications and training	Qualifications and Training - Plymouth.pdf	pdf	5c71854a635d511b3474facd	02/23/2019
Restricting Access to age 21 and older	Restricting Access to Age 21 and Older - Plymouth.pdf	pdf	5c71854bd7a931124ee030fd	02/23/2019
Storage of marijuana	Storage of Marijuana - Plymouth.pdf	pdf	5c71854d3183181258e1ae58	02/23/2019
Transportation of marijuana	Transportation of Marijuana - Plymouth.pdf	pdf	5c71854e9ff0081b4821a38a	02/23/2019
Quality control and testing	Quality Control and Testing -Plymouth.pdf	pdf	5c7185f2eadf341230f67833	02/23/2019
Record Keeping procedures	Record Keeping Procedures - Plymouth.pdf	pdf	5c7185f35fd63c1b24eb519d	02/23/2019
Transportation of marijuana	TRANSPORTATION RFI app32 Plymouth (1).pdf	pdf	5c9a42053779161b2a877437	03/26/2019
Quality control and testing	QUALITY CONTROL RFI app32 Plymouth.pdf	pdf	5c9a42365d4b0b1b3ebc41ee	03/26/2019
Maintaining of financial records	FINANCIAL RECORDS RFI app32 Plymouth.pdf	pdf	5c9a42831e71bd126232f52f	03/26/2019
Security plan	SECURITY PLAN with HOURS OF OPERATION RFI #32 Plymouth.pdf	pdf	5c9a4318635d511b34753d74	03/26/2019
Diversity plan	FINAL- Diversity Plan - Four Daughters - 06-27-2019.pdf	pdf	5d15146e13edb917cc1ffacc	06/27/2019
Diversity plan	Four Daughters ELEVATE letter 4.18.19.pdf	pdf	5d15147333099617d7947808	06/27/2019
Diversity plan	Four Daughters letter re EON donation .pdf	pdf	5d151478bbb965134133e2dc	06/27/2019
Diversity plan	Updated- Diversity Plan - Four Daughters - 12-09-19 (1).pdf	pdf	5deec5f20f35e05798b3af20	12/09/2019
Security plan	9a. Zen Leaf Plymouth - Adult-Use SOPs (3-9-2020).pdf	pdf	5fa97728df85ec07dfb88e65	11/09/2020

Plan for obtaining marijuana or marijuana products	Plan for Obtaining Marijuana or Marijuana Products.pdf	pdf	5fa9773157d9d707ee4d8422	11/09/2020
Dispensing procedures	Zen Leaf Plymouth - Dispensing Procedures (Sales Interaction_SOP-05).pdf	pdf	5fa9773bdd2d7407bedebdd5	11/09/2020
Inventory procedures	Zen Leaf Plymouth - Inventory Procedures (SOP-04).pdf	pdf	5fa977410daeb60847fac00a	11/09/2020
Prevention of diversion	Zen Leaf Plymouth - Prevention of Diversion (SOP-03).pdf	pdf	5fa9774aa75869080486be0d	11/09/2020
Quality control and testing	Zen Leaf Plymouth - Qualifications and Training (SOPs 18, 23 and 24).pdf	pdf	5fa97750edc7d60856d9723e	11/09/2020
Quality control and testing	Zen Leaf Plymouth - Quality Control (SOP-15).pdf	pdf	5fa9775a8cc05c081b1b7198	11/09/2020
Record Keeping procedures	Zen Leaf Plymouth - Recordkeeping & Maintenance of Financials (SOP-13).pdf	pdf	5fa9776275aac308359acce2	11/09/2020
Restricting Access to age 21 and older	Zen Leaf Plymouth - Restricting Access to 21 and Older (Sales Interaction_SOP-05).pdf	pdf	5fa977697083620840286184	11/09/2020
Security plan	Zen Leaf Plymouth - Security Plan (SOP-10).pdf	pdf	5fa9776eedc7d60856d97242	11/09/2020
Storage of marijuana	Zen Leaf Plymouth - Storage (Product Receiving_SOP-01).pdf	pdf	5fa9777657d9d707ee4d842c	11/09/2020
Transportation of marijuana	Zen Leaf Plymouth_Transportation Plan.pdf	pdf	5fa9777a3bf49c082a426235	11/09/2020

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

Adequate Patient Supply Documentation:

Document Category	Document Name	Type	ID	Upload Date
	14A_Adequate Patient Supply Documentation.pdf	pdf	5fa977bfedc7d60856d9724c	11/09/2020

Reasonable Substitutions of Marijuana Types and Strains Documentation:

Document Category	Document Name	Type	ID	Upload Date
	14B_Reasonable Substitutions of Marijuana Types.pdf	pdf	5fa977c9df85ec07dfb88e70	11/09/2020

ATTESTATIONS

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

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

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

Notification: I Understand

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

I certify that to the best knowledge of any of the individuals listed within this application, there are no background events that have arisen since

the issuance of the establishment's final license that would raise suitability issues in accordance with 935 CMR 500.801.: I Agree

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: Donation to EON

Progress or Success Goal 2

Description of Progress or Success: Donation to
ElevateNE

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: Diversity
hiring

Diversity Progress or Success 2

Description of Progress or Success: Donation to EON

Diversity Progress or Success 3

Description of Progress or Success: Donation to
ElevateNE

HOURS OF OPERATION

Monday From: 10:00 AM	Monday To: 8:00 PM
Tuesday From: 10:00 AM	Tuesday To: 8:00 PM
Wednesday From: 10:00 AM	Wednesday To: 8:00 PM
Thursday From: 10:00 AM	Thursday To: 8:00 PM
Friday From: 10:00 AM	Friday To: 8:00 PM
Saturday From: 10:00 AM	Saturday To: 8:00 PM
Sunday From: 10:00 AM	Sunday To: 8:00 PM

PLAN FOR LOCAL COMPLIANCE

Four Daughters has thoroughly reviewed the retail marijuana bylaws for the town of Plymouth. The Corporation has discussed the project at length with Town officials and executed a Community Host Agreement on December 4, 2018.

Four Daughters thoroughly reviewed all local codes, ordinances and bylaws including §203-16 of the Plymouth Zoning Bylaws as amended through April 2018, as they apply to the physical address of the marijuana establishment and in consultation with attorneys and advisors determined that the physical address is in compliance with local codes, ordinances and bylaws. Four Daughters obtained a special permit on October 17, 2018

Four Daughters intends to engage a professional to monitor its compliance. Four Daughters will work with the appropriate authorities in Plymouth in order to secure the necessary permits to begin operations at 11 Richard Road.

Four Daughters will ensure compliance with local codes, ordinances and bylaws for the physical address of the retail establishment through a comprehensive compliance program that will include, but not be limited to, instituting policies and procedures that comply with said regulations and continuously soliciting input from all local stakeholders, public safety and law enforcement authorities.



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 Brian Striar

I, STANLEY ROSEN ^{BS} (insert name) certify as an authorized representative of FOUR DAUGHTERS CANNABIS CARE INC (insert name of applicant) that the applicant has executed a host community agreement with PLYMOUTH (insert name of host community) pursuant to G.L.c. 94G § 3(d) on DECEMBER 4 2018 (insert date).

Stanley Rosen ^{BS}
Signature of Authorized Representative of Applicant

Host Community

I, MARLENE McCOWEN (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for PLYMOUTH (insert name of host community) to certify that the applicant and PLYMOUTH (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on DECEMBER 4 2018 (insert date).

Marlene McCowen
Signature of Contracting Authority or
Authorized Representative of Host Community

BS

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, Brian Strain, (insert name) attest as an authorized representative of Four Daughters Compassionate Care (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 Feb 5th 2019 (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 Jan 25th 2019 (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 Jan 25th 2019 (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 Jan 25th 2019 (insert date), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

5. Information was presented at the community outreach meeting including:
 - a. The type(s) of Marijuana Establishment to be located at the proposed address;
 - b. Information adequate to demonstrate that the location will be maintained securely;
 - c. Steps to be taken by the Marijuana Establishment to prevent diversion to minors;
 - d. A plan by the Marijuana Establishment to positively impact the community; and
 - e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
6. Community members were permitted to ask questions and receive answers from representatives of the Marijuana Establishment.

11 RICHARDS ROAD FOUR DAUGHTERS COMPASSIONATE CARE, INC

11 richards road

Four Daughters

Compassionate Care, Inc

Plymouth Community

Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a proposed marijuana establishment is scheduled for Tuesday, February 5, 2019 at 2:00PM at 11 Richards Road, Units 1 - 3, Plymouth, ma 02360.

A marijuana retailer is proposed for 11 Richards Road, units 1-4, Plymouth, ma 02360.

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

Note: This is the same presentation made on January 25th

13766441 1/25/19

Appeared in: **The Patriot Ledger** on Friday, 01/25/2019

Forward to myPublicNotices.com

**FOUR DAUGHTERS COMPASSIONATE CARE, INC
PLYMOUTH COMMUNITY OUTREACH MEETING**

NOTICE IS HEREBY GIVEN THAT A COMMUNITY OUTREACH MEETING FOR A PROPOSED MARIJUANA ESTABLISHMENT IS SCHEDULED FOR TUESDAY, FEBRUARY 5, 2019 AT 2:00PM AT 11 RICHARDS ROAD, UNITS 1 - 3, PLYMOUTH, MA 02360.

A MARIJUANA RETAILER IS PROPOSED FOR 11 RICHARDS ROAD, UNITS 1-4, PLYMOUTH, MA 02360.

THERE WILL BE AN OPPORTUNITY FOR THE PUBLIC TO ASK QUESTIONS.

NOTE: THIS IS THE SAME PRESENTATION MADE ON JANUARY 25TH

From: Melissa Arrighi <MArrighi@TOWNHALL.PLYMOUTH.MA.US>
Sent: Sunday, January 27, 2019 5:52 PM
To: Pearl Sears <PSears@townhall.plymouth.ma.us>
Cc: Stan <stan29@comcast.net>
Subject: Fw: Four Daughters Community Outreach Meeting Notice
Importance: High

Hi Pearl,

Could you please accept this and post it on behalf of Larry since I believe he is still away?

Thanks
Melissa

From: Stanley L. Rosen <stan29@comcast.net>
Sent: Sunday, January 27, 2019 4:03 PM
To: 'Eileen Hawthorne' <EHawthorne@townhall.plymouth.ma.us>; 'Tara Brennan' <tbrennan@townhall.plymouth.ma.us>; 'Laurence Pizer' <LPizer@townhall.plymouth.ma.us>
Cc: 'Melissa Arrighi' <MArrighi@TOWNHALL.PLYMOUTH.MA.US>
Subject: Four Daughters Community Outreach Meeting Notice
Importance: High

Good morning all,

Attached is a Notice for a Four Daughters Community Outreach Meeting in Plymouth, to be held on February 5th.

Eileen and Tara, would you please distribute the attached Notice of this Meeting to the Chair / Members of the Zoning Board of Appeals and the Planning Board upon receipt of this email.

Laurence, this Notice is being sent to you as it needs to be 'filed with the Town or City Clerk'

Please contact me should you have any questions.

Thanks very much for your assistance.

--Stan Rosen

Stanley Rosen, RPH, MHA, FACHE, FACCP
Massachusetts Registered Health Officer
Co-Founder & Clinical Director
Four Daughters Compassionate Care, Inc
1200 General Edwards Highway (US Rt.1)
Sharon, Massachusetts 02067
mobile: 781.201.9444 | NPI:1376633834

**FOUR DAUGHTERS COMPASSIONATE CARE, INC
PLYMOUTH COMMUNITY OUTREACH MEETING**

NOTICE IS HEREBY GIVEN THAT A COMMUNITY OUTREACH MEETING FOR A PROPOSED MARIJUANA ESTABLISHMENT IS SCHEDULED FOR TUESDAY, FEBRUARY 5, 2019 AT 2:00PM AT 11 RICHARDS ROAD, UNITS 1 - 3, PLYMOUTH, MA 02360.

A MARIJUANA RETAILER IS PROPOSED FOR 11 RICHARDS ROAD, UNITS 1-4, PLYMOUTH, MA 02360.

THERE WILL BE AN OPPORTUNITY FOR THE PUBLIC TO ASK QUESTIONS.

NOTE: THIS IS THE SAME PRESENTATION MADE ON JANUARY 25TH



TOWN OF PLYMOUTH
ASSESSORS' OFFICE

26 Court Street
Plymouth, MA 02360
(508) 747-1620 x10296
assessors@townhall.plymouth.ma.us

RECEIVED

JAN 09 2019

ASSESSORS OFFICE
PLYMOUTH, MA

AL CASH

Abutter List Report
(Please allow 10 days for final list)

RECORD OWNER: 11 Richards Rd. LLC

CONTACT PERSON: Brian Striar

MAILING ADDRESS: 584 Mountain St
Sharon MA 02067

TELEPHONE NO.: 781-264-1233

FACSIMILE NO.: _____

*11 CARLOS PLY
12 " SHARON
23*

Please specify type of request:

☐ Direct Abutter

☐ 100' - Conservation

☒ 300' - Planning/Zoning

Locus:

Subject Address: 11 Richards Road

Parcel ID: 102-000-012E-015B

This is to certify that at the time of the last assessment for taxation made by the Town of Plymouth, the names and addresses of the parties assessed as adjoining owners to the parcel land shown as above written.

Assessor's Use Only

DATE: January 10, 2019

*ownership as of 9/30/18

CERTIFIED BY:

Anne Dunn

Anne Dunn, MAA

Director of Assessing

Town of Plymouth

Abutters List

Page 1 of 1

01/10/2019

8:36:51AM

ParcelID	Location	Owner	Co-Owner	Mailing Address	City	State	Zip
102-000-012E-002	77 INDUSTRIAL PARK RD	SEACOAST REALTY CORPORATIC		77 INDUSTRIAL PARK RD	PLYMOUTH	MA	02360
102-000-012E-007A	12 RICHARD'S RD	TWELVE RICHARDS ROAD LLC		P O BOX 79	KINGSTON	MA	02364
	<i>L includes lots 12E-6A and 22-18A</i>						
102-000-012E-008A	8 RICHARD'S RD	ARC ROCK17MA LLC	ATTN FACILITIES DEPT	288 UNION ST	ROCKLAND	MA	02370
	<i>L includes lot 12E-9</i>						
102-000-012E-014	91 INDUSTRIAL PARK RD	CABLE HOLDCO EXCHANGE III LLC		ONE COMCAST CENTER 321	PHILADELPHIA	PA	19103
102-000-012E-015A	9 RICHARD'S RD	CABLE HOLDCO EXCHANGE III LLC		ONE COMCAST CENTER 321	PHILADELPHIA	PA	19103
102-000-012E-015B	11 RICHARD'S RD	11 RICHARDS ROAD LLC		5 ALDRIN RD	PLYMOUTH	MA	02360
	<i>L subject</i>						
102-000-018-000	19 RICHARD'S RD	CRANBERRY REALTY LLC		1580 SE BALLANTRAE CT	PORT ST LUCIE	FL	34952
102-000-022-010	71 INDUSTRIAL PARK RD	JLM REALTY TRUST CORP		77 INDUSTRIAL PARK ROAD	PLYMOUTH	MA	02360
102-000-022-012	77 INDUSTRIAL PARK RD	SEACOAST REALTY CORPORATIC		77 INDUSTRIAL PARK RD	PLYMOUTH	MA	02360
	<i>L includes lot 22-13</i>						
102-000-022-021	15 RICHARD'S RD	LUCKY EGG LLC		15 RICHARD'S RD	PLYMOUTH	MA	02360
102-000-022-022	INDUSTRIAL PARK RD	SEACOAST REALTY CORPORATIC		77 INDUSTRIAL PARK RD	PLYMOUTH	MA	02360

COMMERCE WAY

102-000-022-018A

102-000-018-000

102-000-022-010

102-000-012E-006A

102-000-022-021

102-000-022-022

102-000-022-013

102-000-012E-007A

102-000-012E-015B

102-000-022-012

102-000-012E-008A

102-000-012E-015A

102-000-012E-002

102-000-012E-009

102-000-012E-014

INDUSTRIAL PARK ROAD

RICHARD'S ROAD

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

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

OFFICIAL USE

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

Postmark
Here

Sent To
Street and
City, State
 Lucky Egg LLC
 15 Richard's Road
 Plymouth MA 02360

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

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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

Article Addressed to:

Lucky Egg LLC
 Richard's Road
 Plymouth MA 02360



9590 9402 4219 8121 1999 57

Article Number (Transfer from service label)

7 2400 0000 2930 1859

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

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature 	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
B. Received by (Printed Name) D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	C. Date of Delivery 11-21

3. Service Type	<input type="checkbox"/> Priority Mail Express
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Collect on Delivery Restricted Delivery	
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	



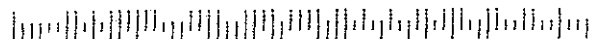
9590 9402 4219 8121 1999 57

First-Class Mail
 Postage & Fees Paid
 USPS
 Remit No. C-40

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

Sender:
 Four Daughters Compassionate Care Inc
 Fifteen North Main Street, Box 12
 Sharon, Massachusetts 02067



701

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

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

OFFICIAL USE

Certified Mail Fee
 \$ _____

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

<input type="checkbox"/> Return Receipt (hardcopy)	\$ _____
<input type="checkbox"/> Return Receipt (electronic)	\$ _____
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ _____
<input type="checkbox"/> Adult Signature Required	\$ _____
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ _____

Postmark
Here

Postage
 \$ _____

Total Postage and Fees
 \$ _____

Sent To Seacoast Realty Corp.
 Street and Ap 77 Industrial Park Road
 City, State, Zi Plymouth MA 02360

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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

Seacoast Realty Corporation
 77 Industrial Park Road
 Plymouth MA 02360



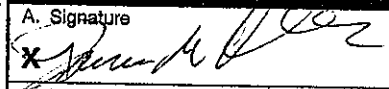
9590 9402 4219 8121 1994 45

2. Article Number (Transfer from service label)

7017 2400 0000 2930 1880

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature  ☐ Agent ☐ Addre

B. Received by (Printed Name) BROOKS C. Date of Del 1-28

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

3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Res Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmat
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmat Restricted Delivery
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	

Domestic Return Rec

USPS TRACKING#



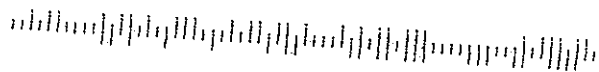
9590 9402 4219 8121 1994 45

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

Sender:
 Four Daughters Compassionate Care Inc
 Fifteen North Main Street, Box 12
 Sharon, Massachusetts 02067

First-Class Mail
 Postage & Fees Paid
 USPS
 Permit No. G-10



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

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

OFFICIAL USE

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

Postmark
Here

Postage	
\$	
Total Postage and Fees	
\$	

Sent to
 Street
 City, State
 Arc Rock 17MA LLC
 Attn: Facilities Dept.
 288 Union St.
 Rockland MA 02370

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

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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

Arc Rock 17MA LLC
 Attn: Facilities Dept.
 288 Union St.
 Rockland MA 02370



9590 9402 4370 8190 2978 06

017 2400 0000 2930 1804

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☐ Agent
 X *[Signature]* ☐ Address

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

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

JAN 28 2018

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

Domestic Return Receipt

USPS TRACKING #



9590 9402 4370 8190 2978 06

First-Class Mail
 Postage & Fees Paid
 USPS
 Permit No. G-10

United States
 Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box.®

Four Daughters Compassionate Care Inc
 Fifteen North Main Street, Box 12
 Sharon, Massachusetts 02067

CERTIFIED MAIL® RECEIPT

Domestic Mail Only

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

Certified Mail Fee

\$

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

<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$

Postmark
Here

Postage

\$

Total Postage and Fees

\$

Sent To 11 Richards Road LLC

Street 5 Aldrin Road

City, St Plymouth MA 02360

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

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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

11 Richards Road LLC
5 Aldrin Road
Plymouth MA 02360



9590 9402 4370 8190 2975 23

2. Article Number (Transfer from service label)

7017 2400 0000 2930 1798

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☐ Agent☐ Addressee

B. Received by (Printed Name)

manly, Nancy

C. Date of Delivery

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

JAN 30 2019

USPS - 02360

3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	

Domestic Return Receipt

USPS TRACKING®



9590 9402 4370 8190 2975 23

United States
Postal Service

* Sender: Please print your name, address, and ZIP+4® in this box *

Four Daughters Compassionate Care Inc
Fifteen North Main Street, Box 12
Sharon, Massachusetts 02067

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

7017 2400 0000 2930 1828

CERTIFIED MAIL® RECEIPT

Domestic Mail Only

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

OFFICIAL USE

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

Postage	\$
Total Postage and Fees	\$

Sent To
Street and A JLM Realty Trust Corp
City, State, Z 77 Industrial Park Road
Plymouth MA 02360

Postmark
Here

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

JLM Realty Trust Corp
77 Industrial Park Road
Plymouth MA 02360



9590 9402 4219 8121 1999 26

2. Article Number (Transfer from service label)

7017 2400 0000 2930 1828

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☐ Agent
☐ Addressee

B. Received by (Printed Name)
J. N. M. 11/28

C. Date of Delivery
11-28

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

3. Service Type	<input type="checkbox"/> Priority Mail Express
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Collect on Delivery Restricted Delivery	
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	

Domestic Return Receipt

USPS TRACKING#



9590 9402 4219 8121 1999 26

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

Sender:
Four Daughters Compassionate Care Inc
Fifteen North Main Street, Box 12
Sharon, Massachusetts 02067

First-Class Mail
Postage & Fees Paid
USPS
Permit No. 940

CERTIFIED MAIL® RECEIPT
Domestic Mail Only

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

OFFICIAL USE

Certified Mail Fee \$

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

<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$

Postage \$

Total Postage and Fees \$

Sent: Cranberry Realty LLC
Street: 580 SE Ballantrae CT
City: Port St. Lucie FL 34952

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Cranberry Realty LLC
580 SE Ballantrae CT
Port St. Lucie FL 34952

2. Article Number (Transfer from service label)

7017 2400 0000 2930 1866

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Registered Mail Restricted Delivery (over \$500)	

USPS TRACKING#

9590 9402 4219 8121 1999 64

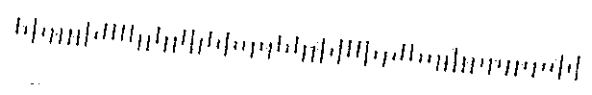
United States Postal Service

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4® in this box*

Sender:
Four Daughters Compassionate Care Inc
Fifteen North Main Street, Box 12
Sharon, Massachusetts 02067

7-120204



7017 2400 0000 2930 1842

CERTIFIED MAIL® RECEIPT

Domestic Mail Only

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

OFFICIAL USE

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

Postmark

Here

Postage	\$
Total Postage and Fees	\$

Sent To: Twelve Richards Road LLC
Street: P.O. Box 79
City, S: Kingston MA 02364

PS Form 3800, April 2015 PSN 7530-02-000-9024 See reverse for instructions

SENDER: COMPLETE THIS SECTION

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

Twelve Richards Road LLC
P.O. Box 79
Kingston MA 02364



9590 9402 4219 8121 1999 40

7 2400 0000 2930 1842

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

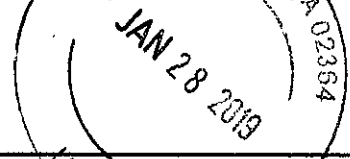
COMPLETE THIS SECTION ON DELIVERY

A. Signature ☐ Agent ☒ Addressee

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

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

If YES, enter delivery address below:



3. Service Type	<input checked="" type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Collect on Delivery Restricted Delivery	
<input type="checkbox"/> Insured Mail	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	

Domestic Return Receipt



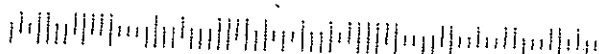
9590 9402 4219 8121 1999 40

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

Sender:
Four Daughters Compassionate Care Inc
Fifteen North Main Street, Box 12
Sharon, Massachusetts 02067

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10



701

CERTIFIED MAIL® RECEIPT

Domestic Mail Only

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

Certified Mail Fee \$3.45
\$2.75
Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$0.50

Total Postage and Fees \$5.70

Sent Seacoast Realty Corp
77 Industrial Park Road
Street Plymouth MA 02360
City

0467

05

Postmark
Here

01/25/2019

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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

Seacoast Realty Corp
77 Industrial Park Road
Plymouth MA 02360



9590 9402 3799 8032 0788 26

2. Article Number (Transfer from service label)

7017 2400 0000 2930 1781

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Signature] ☐ Agent
☐ Addressee

B. Received by (Printed Name)

[Signature] C. Date of Delivery 1-28

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

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |

Domestic Return Receipt

USPS TRACKING#



9590 9402 3799 8032 0788 26

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

Four Daughters Compassionate Care Inc
Fifteen North Main Street, Box 12
Sharon, Massachusetts 02067

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

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

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

OFFICIAL USE

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

Postmark
Here

Postage	
\$	
Total Postage and Fees	
\$	

Sent To	Seacoast Realty Corp.
Street and	77 Industrial Park Road
City, State	Plymouth MA 02360

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

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Seacoast Realty Corporation
 77 Industrial Park Road
 Plymouth MA 02360



9590 9402 4370 8190 2978 13

2. Article Number (Transfer from service label)
 17 2400 0000 2930 1811

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Signature]

- ☐ Agent
- ☐ Addressee

B. Received by (Printed Name)

[Signature]

C. Date of Delivery

7-28

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

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

USPS TRACKING#

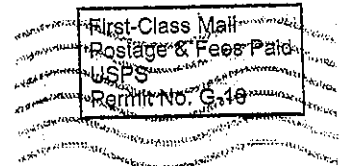


9590 9402 4370 8190 2978 13

**United States
 Postal Service**

• Sender: Please print your name, address, and ZIP+4® in this box•

Sender:
 Four Daughters Compassionate Care Inc
 Fifteen North Main Street, Box 12
 Sharon, Massachusetts 02067



U.S. Postal Service™
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OFFICIAL USE

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

Postmark
Here

Sent To Cable Holdco Exchange III LLC
 Street and A One Comcast Center 32nd FLR
 City, State, Z Philadelphia PA 19103

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

7017 2400 0000 2930 1873

SENDER: COMPLETE THIS SECTION

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

Cable Holdco Exchange III LLC
 One Comcast Center 32nd floor
 Philadelphia PA 19103



9590 9402 4219 8121 1994 38

2. Article Number 7 2400 0000 2930 1873

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☐ Agent
X ☐ Address

B. Received by **COMCAST CORPORATION** C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
 If YES, please print new address: **ONE COMCAST CENTER PHILADELPHIA, PA 19103-2838** ☐ No

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

Domestic Return Receipt

USPS TRACKING#



9590 9402 4219 8121 1994 38

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

Sender:
 Four Daughters Compassionate Care Inc
 Fifteen North Main Street, Box 12
 Sharon, Massachusetts 02067

First-Class Mail
 Postage & Fees Paid
 USPS
 Permit No. G-10

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT

7017 2400 0000 2930 1835

CERTIFIED MAIL® RECEIPT
Domestic Mail Only

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

OFFICIAL USE

Certified Mail Fee \$		Postmark Here 92 NY
Extra Services & Fees (check box, add fee as appropriate)		
<input type="checkbox"/> Return Receipt (hardcopy)	\$	
<input type="checkbox"/> Return Receipt (electronic)	\$	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$	
<input type="checkbox"/> Adult Signature Required	\$	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$	
Postage \$		
Total Postage and Fees \$		
Sent To Cable Holdco Exchange III LLC Street and Apt. No., or PO Box No. One Comcast Center 32nd Floor City, State, ZIP+4® Philadelphia PA 19103		

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

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

1. Cable Holdco Exchange III LLC
One Comcast Center 32nd FLR
Philadelphia PA 19103



9590 9402 4219 8121 1999 33

2. Article Number
7 2400 0000 2930 1835

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature
☒ X **COMCAST CORPORATION** ☐ Agent
☐ Addressee
B. Received by **ONE COMCAST CENTER** Date of Delivery
PHILADELPHIA PA 19103-2838
D. Is delivery restricted? ☐ Yes ☒ No
If YES, enter delivery address below:

3. Service Type
- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |

Domestic Return Receipt

USPS TRACKING

CERTIFIED MAIL®

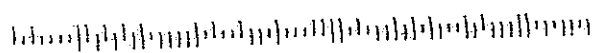


9590 9402 4219 8121 1999 33

United States
Postal Service

• Sender: Please print your name, address, and ZIP+4® in this box•

Sender:
Four Daughters Compassionate Care Inc
Fifteen North Main Street, Box 12
Sharon, Massachusetts 02067



Signed Attestation

I, James Leventis, Esq., as contact person for Four Daughters Compassionate Care, Inc. d/b/a Zen Leaf Plymouth ("Four Daughters") do hereby attest that Four Daughters requested from the Town of Plymouth a record of funds accrued as a result of the Host Community Agreement. Four Daughters has not received a response to date. My signature below verifies this Attestation.

James A. Leventis
James A. Leventis, Esq.

October 29, 2020

(Date)

Subscribed and sworn to before me this 29 day of October 2020.

(SEAL)



Notary Public Heather Dalin



October 13, 2020

VIA FEDEX - OVERNIGHT

Town of Plymouth
c/o Melissa Arrighi, Town Manager
26 Court Street
Plymouth, MA 02360

Re: Four Daughters Compassionate Care, Inc. d/b/a Zen Leaf Plymouth:
Formal Request for Costs Incurred

Dear Ms. Arrighi:

I am reaching out to you on behalf of Four Daughters Compassionate Care, Inc. d/b/a Zen Leaf Plymouth ("Four Daughters"). As you know, Four Daughters' opened for business at 11 Richards Road, Plymouth, Massachusetts 02360 on September 2, 2020. A copy of the Marijuana Retailer license is enclosed for your records (MR282232).

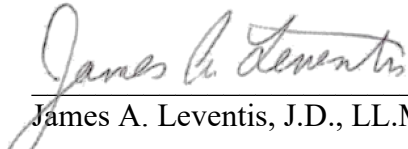
Please allow this letter to serve as a formal request for any costs to date incurred by the Town of Plymouth in relation to Four Daughters' operations. In accordance with M.G.L. c. 94G, § 3(d):

".... any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26."

Pursuant to § 935 CMR 500.140(4)(f), records of Plymouth's costs accrued to date and your response to this request will be submitted to the Cannabis Control Commission as a part of Four Daughters' license renewal application.

We look forward to a long and productive relationship with you and the community at large. Should you have any questions or concerns, please feel free to contact me any time directly at 224-622-8770.

Sincerely,


James A. Leventis, J.D., LL.M.

Positive Impact Plan

In an effort to promote and encourage full participation in the regulated cannabis industry by individuals from communities disproportionately harmed by marijuana prohibition and enforcement and to support one of the Commission's priorities of having an ongoing positive impact on communities, the Company has created the following Positive Impact Plan.

Four Daughters' Positive Impact Plan is an effort to respond to evidence which demonstrates that certain populations, particularly Blacks and Latinos, have been disproportionately impacted by high rates of arrest and incarceration for marijuana and other drug crimes as a result of state and federal drug policy. Criminalization has had long-term ill effects, not only on the individuals arrested and incarcerated, but on their families and communities.

The Commission has identified certain areas that were disproportionately harmed in the past by marijuana prohibition and enforcement as evidenced by their having historically high rates of arrest, conviction and incarceration related to marijuana crimes. Our Positive Impact Plan is focused on the following groups:

1. Past or present residents of Brockton, Mansfield, Taunton and Walpole who have drug convictions and/or have parents or spouses who have drug convictions
2. Past or present residents of communities disproportionately harmed by marijuana prohibition and enforcement
3. Massachusetts residents who have past drug convictions; and
4. Massachusetts residents with parents or spouses who have drug convictions.

The goal of our Positive Impact Plan is to promote practices that seek to repair the negative impacts of disproportionate enforcement of laws upon certain communities and populations. This goal has two components, both having a positive impact on all members of the impacted communities while also helping to reduce barriers to entry into the cannabis industry for people in Brockton, Mansfield, Taunton and Walpole.

Our Positive Impact Plan will create and implement the following programs:

1. Funding expungements for residents with cannabis-related felonies. The Company will identify an attorney to volunteer their time to help residents with completing the necessary expungement paperwork. The Company will work to expunge at least 10 felony records a year, hoping to expunge the record of at least one felon per month.
2. The Company has committed to donating funds to organizations specifically committed to improving the disproportionately impacted areas including Brockton, Mansfield, Taunton, and Walpole specifically:
 - a. Providing a donation (\$5,000) to Equitable Opportunities Now (EON) (www.masseon.com), an organization created to educate and inform people of color on how to become active participants in the Massachusetts legal cannabis market, specifically supporting a path to economic empowerment for people with past marijuana convictions and returning citizens. The Company has performed

its due diligence to obtain a letter from EON stating they are willing to receive the donation the Company intends to provide them. They will use these resources to conduct programming and job trainings, workshops and seminars on different facets of the industry, as well as networking and business events to support equity entrepreneurs in the cannabis space.

b. Providing a donation in the form of a Business Membership (Tier One: \$5,000) to Elevate NE (<https://www.elevatene.org/>) whose mission is to help improve disproportionately impacted areas (including Brockton, Mansfield, Taunton and Walpole). The Company has performed its due diligence to obtain a letter from Elevate NE stating they are willing to receive the donation the Company intends to provide them. Elevate NE will use these resources to offer more educational events around Massachusetts and more scholarship opportunities for the underrepresented communities they support. The additional funding will help them bring more experts in from other states and create more opportunities for them to lobby and support local community involvement.

3. Providing internships or apprenticeships with our company to young adults (over 21) from Brockton, Mansfield, Taunton and Walpole with parents who have cannabis convictions. Our Company will recruit candidates from local trade schools, colleges and universities for year-long paid internships. The purpose of this internship is to teach students about the cannabis industry and to work with them on developing policies and practices to better support and hire persons with cannabis offenses and give them an opportunity to work in the industry.
4. The Company will participate in at least two job fairs per year at area community colleges or host a job fair at their retail location at least once a year.
5. The Company will participate in community “clean-up” initiatives in the areas of disproportionate impact: Brockton, Mansfield, Taunton and/or Walpole.
6. The Company will dedicate 10% of shelf space to Economic Empowerment applicants or Social Equity participants.
7. To the extent allowable by law and excluding senior management, the Company will give hiring preference to individuals from Brockton, Mansfield, Taunton and Walpole. The intended ways to reach those communities for hiring is via local publications, area job fairs and community outreach centers that cater to job seekers in these communities.

The Company will use the following qualitative and quantitative measurement metrics in measuring the results of its programs. Upon renewal, we will demonstrate that the identified program/s in the plan led to measurable success of our goals. Our metrics have an identified data source and method for tracking the data.

The metrics we will utilize include:

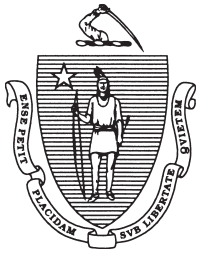
1. Number of employees hired, retained or promoted that come from disproportionate impacted areas (Brockton, Mansfield, Taunton and Walpole) - the goal would be to hire at least 2 employees from the disproportionate impact areas of Brockton, Mansfield, Taunton or Walpole.
2. Number and subject matter of trainings offered and performed and to whom - the goal would be to offer two training programs per year.
3. Specific financial data and/or employee hours showing donations to or investments in to specific causes - the goal would be to support at least two organizations per year.
4. Number of businesses that obtained training or assistance from the programs - the goal would be to provide training or assistance to at least 3 businesses in the disproportionate impact areas of Brockton, Mansfield, Taunton or Walpole.
5. Number and types of jobs created in the adult-use cannabis industry utilizing individuals from Brockton, Mansfield, Taunton or Walpole - the goal would be to create at least 2 positions utilizing individuals from Brockton, Mansfield, Taunton or Walpole.

The Company will be able to demonstrate the success of its programs by:

1. Showing, via personnel records, the actual hiring for employment those who are members of the targeted groups.
2. Showing a record of attendance by members of the targeted groups at seminars, continuing education seminars, and other programs.
3. Producing documentation that criminal records of individuals in the targeted groups have had their records expunged.
4. Producing a record of support group participation and partnership with programs and agencies that will provide assistance to the targeted groups.
5. Maintain a database of local business that the Company has partnered with and update this on a quarterly basis.

In addition, the Company will have the Director of Community Engagement [or designated employee] attend quarterly meetings with local non-profits in an effort to remain informed about the challenges facing area felons and persons with cannabis-related criminal offenses so that the Company can play an ongoing role in helping to alleviate barriers.

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



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

William Francis Galvin
Secretary of the
Commonwealth

Date: February 08, 2019

To Whom It May Concern :

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

FOUR DAUGHTERS COMPASSIONATE CARE INC.

is a domestic corporation organized on **August 23, 2018** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

A handwritten signature in blue ink, reading "William Francis Galvin".

Secretary of the Commonwealth

Certificate Number: 19020115690

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

Processed by:

**SECOND AMENDED AND RESTATED BYLAWS
OF
FOUR DAUGHTERS COMPASSIONATE CARE, INC.
(a corporation organized under M.G.L. Ch. 156D)**

ARTICLE I. OFFICES

Section 1.1. Registered Office and Agent. The registered office and registered agent of the Corporation shall be as set forth in the Corporation's Articles of Organization or subsequent filing with the Secretary of the Commonwealth. The Board of Directors or President of the Corporation may at any time change the registered office or the registered agent by making the appropriate filing with the Secretary of the Commonwealth.

Section 1.2. Principal Office. The principal office of the Corporation shall be within or without the Commonwealth of Massachusetts as set forth in the Corporation's Articles of Organization or subsequent filing with the Secretary of the Commonwealth.

Section 1.3. Other Offices. The Corporation may also have other offices at any places, within or without the Commonwealth of Massachusetts, as the Board of Directors may designate, or as the business of the Corporation may require or as may be desirable.

Section 1.4. Books and Records. Any records maintained by the Corporation in the regular course of its business, including its share ledger, books of account and minute books, may be maintained on any information storage device or method; provided that the records so kept can be converted into clearly legible paper form within a reasonable time. The Corporation shall convert any records so kept upon the written request of any person entitled to inspect such records pursuant to applicable law.

ARTICLE II. SHAREHOLDERS

Section 2.1. Place of Meeting. Meetings of the shareholders shall be held either at the principal office of the Corporation or at any other place designated by the Board of Directors, either within or without the Commonwealth of Massachusetts, as shall be designated in the notice of the meeting or executed waiver of notice. The Board of Directors may, in its discretion, determine that the meeting may be held solely by means of remote communication as set out in Section 2.02 below.

Section 2.2. Meetings of Shareholders by Remote Communication. If authorized by the Board of Directors, and subject to any guidelines and procedures adopted by the Board of Directors, shareholders not physically present at a meeting of shareholders may participate in a meeting of shareholders by means of remote communication, and such shareholders may be considered present in person and may vote at a meeting of shareholders, whether held at a designated place or solely by means of remote communication, subject to the conditions imposed by applicable law.

At a meeting in which shareholders can participate by means of remote communication, the Corporation shall implement reasonable measures to:

- a. Verify that each person deemed present and permitted to vote at the meeting by means of remote communication is a shareholder or proxy holder;
- b. Allow shareholders and proxy holders participating by remote communication to either read or hear the proceedings as they take place and to participate in the meeting and vote on matters submitted to the shareholders; and
- c. Maintain a record of the vote or other action taken by shareholders at the meeting by means of remote communication.

Section 2.3. Annual Meeting. An annual meeting of shareholders, for the purpose of electing directors and transacting any other business as may be brought before the meeting, shall be held on the third Tuesday in April, or such other date before May 31 as approved by the Board of Directors.

Failure to hold the annual meeting at the designated time shall not affect the validity of any action taken by the Corporation. If the Board of Directors fails to call the annual meeting, any shareholder may make demand in writing to any officer of the Corporation that an annual meeting be held.

Section 2.4. Special Shareholders' Meetings. Special meetings of the shareholders may be called:

- a. by the Board of Directors;
- b. by the President;
- c. by Chairman of the Board of Directors; or
- d. upon the demand of the holders of at least twenty-five percent (25%) of all the votes entitled to be cast on any issue proposed to be considered at the proposed special meeting.

In order for the shareholders to demand a special meeting, the shareholders of the required percentage of shares must sign, date, and deliver to the Corporation's Secretary one or more written demands for the meeting, describing the purposes for which the meeting is to be held.

Only business within the purposes described in the Corporation's meeting notice may be conducted at a special meeting of the shareholders.

Section 2.5. Fixing the Record Date. For the purpose of determining shareholders entitled to notice of or to vote at any meeting of shareholders or any adjournment thereof, the record date shall be the date specified by the Board of Directors in the notice of the meeting. If no date is specified by the Board of Directors, the record date shall be the close of business on

the day before the notice of the meeting is mailed to shareholders. If no notice is sent, the record date shall be the date set by the law applying to the type of action to be taken for which a record date must be set.

In the case of action by written consent of the shareholders without a meeting, the record date shall be (a) the date fixed by the board of directors or (b) the date that the first shareholder signs the written consent if no date has been fixed by the board.

A record date fixed under this Section may not be more than seventy (70) days before the meeting or action requiring a determination of shareholders. A determination of shareholders entitled to notice of or to vote at a shareholders' meeting is effective for any adjournment of the meeting unless the Board of Directors fixes a new record date.

Section 2.6. Notice of Shareholders' Meeting. Written or printed notice stating the place, day and hour of the meeting, the means of any remote communication by which shareholders may be considered present and may vote at the meeting (if applicable), and, in case of a special meeting, the purpose or purposes for which the meeting is called, shall be given not less than seven (7) days nor more than sixty (60) days before the date of the meeting. Notice shall only be required to be made to shareholders entitled to vote at the meeting unless the purpose of the meeting is for the transaction of business for which notice to all shareholders is required by law.

Notice shall be given to a by personal delivery, by electronic transmission if consented to by a shareholder, or by mail, by or at the direction of the President, the Secretary, or the officer or person calling the meeting. If mailed, the notice shall be deemed to be given when deposited in the United States mail addressed to the shareholder at the shareholder's address as it appears on the share transfer records of the Corporation, with postage thereon prepaid.

Any person entitled to notice of a meeting may sign a written waiver of notice either before or after the time of the meeting. The participation or attendance at a meeting of a person entitled to notice constitutes waiver of notice, except where the person attends for the specific purpose of objecting to the lawfulness of the convening of the meeting.

Section 2.7. Voting Lists. The officer or agent having charge of the share transfer records for shares of the Corporation shall prepare an alphabetical list of all shareholders entitled to notice of the meeting, arranged by voting group and by class and series of share, with the address of and the number of shares held by each shareholder. The list shall be available for inspection by any shareholder beginning two (2) business days after notice of the meeting is given at the principal place of business of the Corporation or if the meeting will be held at another location, at a place in the city where the meeting will be held, which shall be identified in the meeting notice.

The list shall also be produced and kept open at the time and place of the meeting and shall be subject to the inspection of any shareholder during the whole time of the meeting. If any shareholders are participating in the meeting by means of remote communication, the list must be open to examination by the shareholders for the duration of the meeting on a reasonably accessible electronic network, and the information required to access the list must be provided to shareholders in the meeting notice. The Corporation shall take reasonable steps to ensure that the information is available only to shareholders of the Corporation.

Section 2.8. Quorum of Shareholders. A quorum shall be present for action on any matter at a shareholder meeting if a majority of the votes entitled to be cast on the matter by a voting group is represented at the meeting in person or by proxy. A voting group includes all shares of one or more classes or series that are entitled, by law or the Articles of Organization, to vote and to be counted together collectively on a matter at a meeting of shareholders.

Once a quorum for a voting group has been established at a meeting, the shareholders in that voting group represented in person or by proxy at the meeting are deemed present for quorum purposes for the remainder of the meeting and for any adjournment unless:

- a. The shareholder attends the meeting solely to object to defective notice or the conduct of the meeting on other grounds and does not vote the shares or take any other action at the meeting.
- b. The meeting is adjourned and a new record date is set for the adjourned meeting.

The shareholders in a voting group represented in person or by proxy at a meeting of shareholders, even if not comprising a quorum, may adjourn the meeting as to the voting group until a time and place as may be determined by a vote of the holders of a majority of the shares of the voting group represented in person or by proxy at that meeting. If the meeting is adjourned for more than 120 days after the date fixed for the original meeting, a new record date must be fixed by the Board of Directors; notice of the meeting must be given to the shareholders who are members of the voting group as of the new record date, and a new quorum for the meeting must be established.

Section 2.9. Conduct of Meetings. The Board of Directors of the Corporation may adopt by resolution rules and regulations for the conduct of meetings of the shareholders, as it deems appropriate. At every meeting of the shareholders, the Chairman of the Board of Directors, or in his or her absence or inability to act, a director or officer designated by the Board of Directors, shall act as the presiding officer of the meeting. The Secretary or, in his or her absence or inability to act, the person whom the chair of the meeting shall appoint secretary of the meeting, shall act as secretary of the meeting and keep the minutes thereof.

The presiding officer shall determine the order of business and, in the absence of a rule adopted by the Board of Directors, shall establish rules for the conduct of the meeting. The presiding officer shall announce the close of the polls for each matter voted upon at the meeting, after which no ballots, proxies, votes, changes or revocations will be accepted. Polls for all matters before the meeting will be deemed to be closed upon final adjournment of the meeting.

Section 2.10. Voting of Shares. Each outstanding share, regardless of class, shall be entitled to one vote on each matter submitted to a vote at a meeting of shareholders, except to the extent that the Articles of Organization provides for more or less than one vote per share or limits or denies voting rights to the holders of the shares of any class or series.

If a quorum of a voting group exists, favorable action on a matter, other than the election of Directors, will be approved by a voting group if the votes cast within the group favoring the action exceed the votes cast opposing the action, unless a greater or lesser number of votes is required by law or a greater vote is required by the Articles of Organization, these Bylaws or a

resolution of the Board of Directors requiring receipt of a greater affirmative vote of the shareholders, including more separate voting groups.

Directors are elected by a plurality of the votes cast by the shares entitled to vote in the election at a meeting at which a quorum is present.

OR

No ballot shall be required for the election of directors unless requested by a shareholder present or represented at the meeting and entitled to vote in the election.

Section 2.11. Voting by Proxy or Nominee. Shares of the Corporation's stock owned by the Corporation itself or by another corporation or entity, the majority of the voting stock or interest of which is owned or controlled by the Corporation, shall not be voted, directly or indirectly, at any meeting, and shall not be counted in determining the total number of outstanding shares at any given time. Nothing in this section shall be construed as limiting the right of the Corporation or any domestic or foreign corporation or other entity to vote shares, held or controlled by it in a fiduciary capacity, or with respect to which it otherwise exercises voting power in a fiduciary capacity.

A shareholder may vote either in person or by proxy executed in writing by the shareholder or his or her attorney-in-fact. An appointment of a proxy is effective when received by the Secretary or other officer or agent authorized by the Corporation to tabulate votes. No proxy shall be valid after eleven (11) months from the date of its execution unless otherwise provided in the proxy. A proxy shall be revocable unless the proxy form conspicuously states that the proxy is irrevocable and the proxy is coupled with an interest as defined in the Massachusetts Business Corporations Act. An appointment made irrevocable is revoked when the interest with which it is coupled is extinguished. The death or incapacity of the shareholder appointing a proxy shall not affect the right of the Corporation to accept the proxy's authority unless notice of the death or incapacity is received by the Secretary or other officer or agent authorized to tabulate votes before the proxy exercises his or her authority under the appointment.

Shares owned by another corporation, domestic or foreign, may be voted by any officer, agent, or proxy as the bylaws of that corporation may authorize or, in the absence of authorization, as the Board of Directors of that corporation may determine.

An administrator, executor, guardian, or conservator may vote shares held in that fiduciary capacity if the shares forming a part of an estate are in the possession and forming a part of the estate being served by the fiduciary, either in person or by proxy, without a transfer of the shares into the fiduciary's name. A trustee may vote shares standing held in trustee's name, either in person or by proxy, but no trustee shall be entitled to vote shares held by him or her without a transfer of the shares into his or her name as trustee.

A receiver may vote shares standing in the name of a receiver and may vote shares held by or under the control of a receiver without the transfer thereof into the receiver's name if authority so to do be contained in an appropriate order of the court by which the receiver was appointed.

A shareholder whose shares are pledged shall be entitled to vote the shares until the shares have been transferred into the name of the pledgee, and thereafter the pledgee shall be entitled to vote the shares transferred, subject to any agreements containing restrictions on the hypothecation, assignment, pledge, or voluntary or involuntary transfer of shares.

The Board of Directors may establish a procedure by which the beneficial owner of shares that are registered in the name of a nominee may be recognized by the Corporation as the shareholder to the extent provided by the procedure. The procedure may set forth the types of nominees to which it applies, the rights or privileges that the Corporation recognizes in a beneficial owner, the manner in which the procedure is selected by the nominee, a requirement for the certification by the nominee of the beneficial owner, the information to be provided when the procedure is selected, the period for which selection of the procedure is effective, and other aspects of the rights and duties created.

Section 2.12. Written Consent of Shareholders Without a Meeting. Any action required or permitted to be taken at any annual or special meeting of shareholders may be taken without a meeting, if a consent or consents in writing, setting forth the action so taken, shall have been signed by shareholders not having less than the minimum number of votes necessary to take the action at a meeting at which all shareholders entitled to vote on the action are present and voting. The action shall be evidenced by one or more written consents that describe the action taken, are signed by shareholders having the requisite votes, bear the date of the signatures of such shareholders, and are delivered to the Corporation for inclusion with the records of meetings within sixty (60) days of the earliest dated consent delivered to the Corporation.

If the action to be taken pursuant to the consent of voting shareholders without a meeting is one for which notice to all shareholders would be required by law if the action were to be taken at a meeting, then the Corporation shall give notice, in the manner specified by Section 2.6, at least seven (7) days before the action is taken, to all nonvoting shareholders that would be entitled to vote on such action at a meeting of shareholders.

ARTICLE III. DIRECTORS

Section 3.1. Powers. All corporate power shall be exercised by or under the authority of, and the business and affairs of the Corporation shall be managed under the direction of, the Board of Directors, except such powers expressly conferred upon or reserved to the shareholders, and subject to any limitations set forth by law, by the Articles of Organization or by these Bylaws.

Section 3.2. Number of Directors. The Board of Directors may consist of one (1) director notwithstanding the number of shareholders of the Corporation with the number fixed from time to time by resolution adopted by the Board of Directors or the shareholders. No decrease in the number of directors shall have the effect of decreasing the number of directors below the minimum number of individuals permitted by law, nor shall have the effect of shortening the term of any incumbent director.

The number of directors shall be [NUMBER] provided that the number may be increased or decreased from time to time by an amendment to these Bylaws or resolution adopted by the Board of Directors or by the shareholders. No decrease in the number of directors shall have the

effect of decreasing the number of directors below the minimum number of individuals permitted by law, nor shall have the effect of shortening the term of any incumbent director.

Section 3.3. Term of Office. At the first annual meeting of shareholders and at each annual meeting thereafter, the holders of shares entitled to vote in the election of directors shall elect directors to hold office until the next succeeding annual meeting. Despite the expiration of a director's term, he or she shall continue to serve until his or her successor is elected and qualified or until there is a decrease in the number of directors.

Section 3.4. Vacancies. Vacancies and newly created directorships, whether resulting from an increase in the size of the board of directors, from the death, resignation, disqualification or removal of a director or otherwise, may be filled by the affirmative vote of a majority of the remaining directors then in office, even though less than a quorum of the Board of Directors. A director elected to fill a vacancy shall be elected for the unexpired term of his or her predecessor in office.

Section 3.5. Removal. Directors may be removed from office at any time with or without cause by the shareholders entitled to elect them or for cause by vote of a majority of the directors then in office. A director may be removed by shareholders or directors only at a meeting called for that purpose, for which the notice must state that the purpose, or one of the purposes, of the meeting is removal of the director or directors.

Section 3.6. Resignation. A director may resign by providing notice in writing to the Corporation. The resignation shall be effective upon the later of the date of receipt of the notice of resignation or the effective date specified in the notice. Acceptance of the resignation shall not be required to make the resignation effective.

Section 3.7. Meeting of Directors. A regular meeting of the newly-elected Board of Directors shall be held without other notice immediately following each annual meeting of shareholders, at which the board shall elect officers and transact any other business as shall come before the meeting. The board may designate a time and place for additional regular meetings, within or outside Massachusetts, by resolution, without notice other than the resolution.

Special meetings of the Board of Directors may be called by the President, by the Chairman of the Board, if any, by the Secretary, by any two directors, or by one director in the event that there is only one director.

Section 3.8. Participation by Remote Communication. The Board of Directors may permit any or all directors to participate in any meeting by, or conduct the meeting through the use of, any means of communication by which all directors participating may simultaneously hear each other during the meeting. A director participating in a meeting by this means is considered to be present in person at the meeting.

Section 3.9. Notice of Directors' Meetings. All special meetings of the Board of Directors shall be held upon not less than two (2) days' notice stating the date, place and time of the meeting given to each director or not less than two (2) hours' notice in the event of an emergency.

Notice may be given to each personally, by telephone or voice mail, by mail, by electronic transmission if consented to by the director, or by messenger or delivery service.

A written waiver of the required notice signed by a director entitled to the notice, before or after the meeting, is the equivalent of giving notice to the director who signs the waiver. A director's attendance at any meeting shall constitute a waiver of notice of the meeting, except where the director attends a meeting for the express purpose of objecting to the transaction of any business on the grounds that the meeting is not lawfully called or convened.

Section 3.10. Quorum and Action of Directors. A majority of the number of directors shall constitute a quorum for the transaction of business. The act of the majority of the directors present at a meeting at which a quorum is present at the time of the act shall be the act of the Board of Directors, unless the act of a greater number is required by law, the Articles of Organization, or these Bylaws. The directors at a meeting for which a quorum is not present may adjourn the meeting until a time and place as may be determined by a vote of the directors present at that meeting.

Section 3.11. Compensation. Directors shall not receive any stated salary for their services, but by resolution of the Board of Directors a fixed sum and expenses of attendance, if any, may be allowed for attendance at any meeting of the Board of Directors or committee thereof. A director shall not be precluded from serving the Corporation in any other capacity and receiving compensation for services in that capacity.

Section 3.12. Action by Directors Without a Meeting. Any action required or permitted to be taken at a meeting of the Board of Directors or any committee thereof may be taken without a meeting if all members of the Board of Directors or committee consent in writing or by electronic transmission and the writings or electronic transmissions are filed with the minutes of the proceedings of the Board of Directors.

Section 3.13. Committees of the Board of Directors. The Board of Directors, by resolution adopted by a majority, may designate one or more directors to constitute one or more committees, to exercise the authority of the Board of Directors to the extent provided in the resolution of the Board of Directors and allowed under the law of the Commonwealth.

A committee of the Board of Directors does not have the authority to:

- a. Authorize distributions;
- b. Approve or propose to shareholders action that this chapter requires be approved by shareholders, including an amendment to the Articles of Organization;
- c. Change the number of the Board of Directors, remove directors from office or fill vacancies on the Board of Directors, or
- d. Adopt, amend, or repeal the Bylaws of the Corporation.

The designation of a committee of the Board of Directors and the delegation thereto of authority shall not operate to relieve the Board of Directors, or any member thereof, of any responsibility imposed by law.

ARTICLE IV. OFFICERS

Section 4.1. Positions and Appointment. The officers of the Corporation shall be appointed by the Board of Directors and shall be a President, a Treasurer, a Secretary, and any other officers, including assistant officers and agents, as may be deemed necessary by the Board of Directors. Any two or more offices may be held by the same person.

Each officer shall serve until a successor is appointed and qualified, or until the death, resignation, or removal of that officer. Vacancies or new offices shall be filled at the next regular or special meeting of the Board of Directors. Appointment of an officer or agent shall not of itself create contract rights.

Section 4.2. Removal. Any officer appointed or elected by the Board of Directors may be removed with or without cause by the affirmative vote of the majority of the Board of Directors at any regular or special meeting. Removal shall be without prejudice to the contract rights, if any, of the officer so removed.

Section 4.3. President. The President shall be the chief executive officer of the Corporation, and subject to the direction of the Board of Directors, shall have active, general supervision and executive management over the business and affairs of the Corporation. The President shall preside at all meetings of all directors, shall see that all orders and resolutions of the Board of Directors are carried out, and shall perform any other duties as the Board of Directors may assign.

Section 4.4. Vice-Presidents. Each Vice President, in order of their rank as designated by the Board of Directors, shall perform the duties and exercise the powers of the President in the absence or disability of the President, and shall perform other duties as the Board of Directors or President shall assign.

Section 4.5. The Secretary and Assistant Secretaries. The Secretary shall attend all meetings of the Board of Directors and all meetings of the shareholders and shall record all votes and the minutes of all proceedings and shall perform like duties for the standing committees when required. The Secretary shall give or cause to be given notice of all meetings of the shareholders and all meetings of the Board of Directors and shall perform other duties as may be prescribed by the Board of Directors or the President. The Secretary shall be the custodian of the records and of the seal of the Corporation, and shall affix the seal to all documents and attest to it, when duly authorized by the Board of Directors.

The Assistant Secretaries shall, in order of their rank as designated by the Board of Directors, in the absence or disability of the Secretary, perform the duties and exercise the powers of the Secretary, and they shall perform other duties as the Board of Directors or the Secretary shall assign.

In the absence of the Secretary or an Assistant Secretary, the minutes of all meetings of the board and shareholders shall be recorded by the person designated by the President or by the Board of Directors.

Section 4.6. The Treasurer and Assistant Treasurers. The Treasurer shall be the principal financial officer of the Corporation, shall have the custody of the corporate funds and securities, shall keep full and accurate accounts of receipts and disbursements of the Corporation, shall deposit all moneys and other valuable effects in the name and to the credit of the Corporation in the depositories designated by the Board of Directors, and in general shall perform all the duties incident to the office of Treasurer and such other duties as from time to time may be assigned by the Board of Directors or by the President.

The Treasurer shall disburse the funds of the Corporation as may be ordered by the Board of Directors, taking proper vouchers for the disbursements. The Treasurer shall keep and maintain the Corporation's books of account and shall render to the President and the Board of Directors an account of all of his or her transactions as Treasurer and of the financial condition of the Corporation and exhibit the books, records and accounts to the President or the Board of Directors at any time.

If required by the Board of Directors, the Treasurer shall give the Corporation a bond in a sum and with a surety or sureties satisfactory to the Board of Directors for the faithful performance of the duties of the office and for the restoration to the Corporation, in case of death, resignation, retirement or removal from office, of all books, papers, vouchers, money and other property of whatever kind in the incumbent's possession or under the incumbent's control belonging to the Corporation.

The Assistant Treasurers in the order of their seniority shall, in the absence or disability of the Treasurer, perform the duties and exercise the powers of the Treasurer, and they shall perform other duties as the Board of Directors shall prescribe.

ARTICLE V. INDEMNIFICATION OF DIRECTORS AND OFFICERS

The Corporation shall indemnify a director or officer who was wholly successful, on the merits or otherwise, in the defense of any proceeding to which he or she was a party because he or she was a director or officer of the Corporation against reasonable expenses incurred by him or her in connection with the proceeding.

The Corporation may, to the fullest extent permitted by law, indemnify each person who may serve or who has served at any time as a director or officer of the Corporation or of any of its subsidiaries, or who at the request of the Corporation may serve or at any time has served as a director, officer, administrator or trustee of, or in a similar capacity with, another organization or any employee benefit plan, against all expenses and liabilities, including counsel fees, reasonably incurred by or imposed upon such person in connection with any proceeding in which he may become involved by reason of his serving or having served in such capacity.

The indemnification provided hereunder shall inure to the benefit of the heirs, executors and administrators of a director, officer or other person entitled to indemnification hereunder.

The foregoing right of indemnification shall be in addition to and not exclusive of any other rights which such director or officer or other person may be entitled under the Articles of Organization, any agreement, or pursuant to any action taken by the directors or shareholders of the Corporation or otherwise.

ARTICLE VI. SHARE CERTIFICATES AND TRANSFERS

Section 6.1. Certificates Representing Shares. If shares are represented by certificates, at a minimum each share certificate shall state upon the face thereof:

- a. The name of the Corporation and that it is organized under the laws of the Commonwealth.
- b. The name of the person to whom issued.
- c. The number and class of shares and the designation of the series, if any, which the certificate represents.

No share shall be issued until the consideration therefor, fixed as provided by law, has been fully paid.

Section 6.2. Transfers of Shares. Shares of the Corporation shall be transferable in the manner prescribed by law and in these Bylaws. Transfers of shares shall be made on the books of the Corporation only by the holder of record thereof, by such person's attorney lawfully constituted in writing and, in the case of certificated shares, upon the surrender of the certificate thereof, which shall be cancelled before a new certificate or uncertificated shares shall be issued. No transfer of shares shall be valid as against the Corporation for any purpose until it shall have been entered in the share records of the Corporation by an entry showing from and to whom transferred.

Section 6.3. Registered Shareholders. The Corporation may treat the holder of record of any shares issued by the Corporation as the holder in fact thereof, for purposes of voting those shares, receiving distributions thereon or notices in respect thereof, transferring those shares, exercising rights of dissent with respect to those shares, exercising or waiving any preemptive right with respect to those shares, entering into agreements with respect to those shares in accordance with the laws of the Commonwealth, or giving proxies with respect to those shares.

Section 6.4. Lost Certificates. The Board of Directors may direct a new certificate or certificates to be issued in place of any certificate or certificates theretofore issued by the Corporation alleged to have been lost or destroyed, upon the making of an affidavit of that fact by the person claiming the certificate to be lost. When authorizing the issue of a new certificate or certificates, the Board of Directors in its discretion and as a condition precedent to the issuance thereof, may require the owner of the lost or destroyed certificate or certificates or his or her legal representative to give the Corporation a bond with surety in a sum as it may direct as indemnity against any claim that may be made against the Corporation or other obligees with respect to the certificate alleged to have been lost or destroyed.

ARTICLE VII. MISCELLANEOUS

Section 7.1. Seal. The Corporation may adopt a corporate seal in a form approved by the Board of Directors. The Corporation shall not be required to use the corporate seal and the lack of the corporate seal shall not affect an otherwise valid contract or other instrument executed by the Corporation.

Section 7.2. Checks, Drafts, Etc. All checks, drafts or other instruments for payment of money or notes of the Corporation shall be signed by an officer or officers or any other person or persons as shall be determined from time to time by resolution of the Board of Directors.

Section 7.3. Fiscal Year. The fiscal year of the Corporation shall be as determined by the Board of Directors.

Section 7.4. Invalid Provisions. If any one or more of the provisions of these Bylaws, or the applicability of any provision to a specific situation, shall be held invalid or unenforceable, the provision shall be modified to the minimum extent necessary to make it or its application valid and enforceable, and the validity and enforceability of all other provisions of these Bylaws and all other applications of any provision shall not be affected thereby.

ARTICLE VIII. AMENDMENT OF BYLAWS

The power to make, amend, or repeal these Bylaws shall be in the shareholders.

The directors also may make, amend, or repeal these Bylaws in whole or in part, except with respect to any provision that by virtue of the law, the Articles of Organization or these Bylaws requires action by the shareholders.

D

The Commonwealth of Massachusetts

William Francis Galvin

Secretary of the Commonwealth

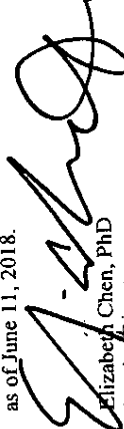
One Ashburton Place, Boston, Massachusetts 02108-1512

FORM MUST BE TYPED

**Articles of Entity Conversion of a
Domestic Non-Profit with a Pending Provisional
or Final Certification to Dispense Medical Use Marijuana
to a Domestic Business Corporation**
(General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

FORM MUST

Four Daughters Compassionate Care, Inc. is a registrant
with the Department of Public Health
in accordance with 105 CMR 725.100(C)
as of June 11, 2018.


Elizabeth Chen, PhD
Interim Director
Bureau of Health Care Safety and Quality
Massachusetts Department of Public Health

(1) Exact name of the non-profit: Four Daughters Compassionate Care Inc. 001179620

(2) A corporate name that satisfies the requirements of G.L. Chapter 156D, Section 4.01:

Four Daughters Compassionate Care Inc.

(3) The plan of entity conversion was duly approved in accordance with the law.

The Plan of Entity Conversion was approved by a unanimous Consent of Sole Member and Board of Directors on June 7, 2018.

(4) The following information is required to be included in the articles of organization pursuant to G.L. Chapter 156D, Section 2.02(a) or permitted to be included in the articles pursuant to G.L. Chapter 156D, Section 2.02(b):

ARTICLE I

The exact name of the corporation upon conversion is:

Four Daughters Compassionate Care Inc.

ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. Chapter 156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:*

N/A

ARTICLE III

State the total number of shares and par value, * if any, of each class of stock that the corporation is authorized to issue. All corporations must authorize stock. If only one class or series is authorized, it is not necessary to specify any particular designation.

WITHOUT PAR VALUE		WITH PAR VALUE		
TYPE	NUMBER OF SHARES	TYPE	NUMBER OF SHARES	PAR VALUE
			200,000	\$0.0001

ARTICLE IV

Prior to the issuance of shares of any class or series, the articles of organization must set forth the preferences, limitations and relative rights of that class or series. The articles may also limit the type or specify the minimum amount of consideration for which shares of any class or series may be issued. Please set forth the preferences, limitations and relative rights of each class or series and, if desired, the required type and minimum amount of consideration to be received.

There is a single class and series of common stock with no relative preferences within the class. The minimum consideration is the par value of \$0.0001 per share.

ARTICLE V

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

N/A

ARTICLE VI

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

Please see attached continuation sheets 6A, 6B and 6C.

Note: The preceding six (6) articles are considered to be permanent and may be changed only by filing appropriate articles of amendment.

Continuation Sheet 6A

Special Provisions

ONE: All corporate powers of the Corporation shall be exercised by the Board of Directors except as otherwise provided by law. The Board of Directors may consist of one or more individuals notwithstanding the number of shareholders. In furtherance and not in limitation of the powers conferred by statute, the Board of Directors is expressly authorized to make, amend or repeal the By-Laws of the Corporation in whole or in part, except with respect to any provision thereof which by law or the By-Laws requires action by the shareholders, and subject to the power of the shareholders to amend or repeal any By-Law adopted by the Board of Directors.

TWO: Meetings of the shareholders of the Corporation may be held anywhere within the United States.

THREE: The Corporation may be a partner in any business enterprise which it would have power to conduct by itself.

FOUR: In the absence of fraud, no contract or other transaction of the Corporation shall be affected or invalidated by the fact that any of the directors of the Corporation are in any way interested in or connected with any other party to such contract or transaction or are themselves parties to such contract or transaction, provided that the interest in any such contract or transaction of any such director shall at the time be fully disclosed or otherwise known to the Board of Directors. Any director of the Corporation may be counted in determining the existence of a quorum at any meeting of the Board of Directors which shall authorize such contract or transaction and may vote and act upon any matter, contract or transaction between the Corporation and any other person without regard to the fact that he is also a shareholder, director or officer of, or has any interest in, such other person with the same force and effect as if he were not such shareholder, director or officer or not so interested. Any contract or other transaction of the Corporation or of the Board of Directors or of any committee thereof which shall be ratified by a majority of the holders of the issued and outstanding stock entitled to vote at any annual meeting or any special meeting called for that purpose shall be as valid and as binding as though ratified by every shareholder of the Corporation; provided, however, that any failure of the shareholders to approve or ratify such contract or other transaction, when and if submitted, shall not be deemed in any way to render the same invalid or deprive the directors and officers of their right to proceed with such contract or other transaction.

Continuation Sheet 6B

FIVE: The Corporation shall, to the extent legally permissible, indemnify each person (and his heirs, executors, administrators, or other legal representatives) who is, or shall have been, a director or officer of the Corporation or any person who is serving, or shall have served, at the request of the Corporation as a director or officer of another corporation, against all liabilities and expenses (including judgments, fines, penalties and attorneys' fees and all amounts paid in compromise or settlement) reasonably incurred by any such director, officer or person in connection with, or arising out of, any action, suit or proceeding in which any such director, officer or person may be a party defendant or with which he may be threatened or otherwise involved, directly or indirectly, by reason of his being or having been a director or officer of the Corporation or such other corporation, except in relation to matters as to which any such director, officer or person shall be finally adjudged, other than by consent, in such action, suit or proceeding not to have acted in good faith in the reasonable belief that his action was in the best interests of the corporation; provided, however, that indemnity shall not be made with respect to such amounts paid in compromise or settlement, unless:

(a) such compromise or settlement shall have been approved as in the best interests of the corporation, after notice that it involves such indemnification by:

- (i) The Board of Directors by a majority of a quorum consisting of directors who were not parties to such action, suit or proceeding, or by
- (ii) The shareholders of the Corporation by a majority vote of a quorum consisting of shareholders who were not parties to such action, suit or proceeding, or

(b) in the absence of action by disinterested directors or shareholders as above provided, there has been obtained at the request of a majority of the Board of Directors then in office a written opinion of independent legal counsel to the effect that the director or officer to be indemnified appears to have acted in good faith in the reasonable belief that his action was in the best interests of the Corporation.

Continuation Sheet 6C

Upon request therefor by any director, officer, or person enumerated in the preceding paragraph of this Article, the Corporation may from time to time, if authorized by the Board of Directors, prior to final adjudication or compromise or settlement of the matter or matters as to which indemnification is claimed, advance to such director, officer or person all expenses incurred by him to date of such request. Any advance made pursuant to this provision shall be made on the condition that the director, officer or person receiving such advance shall repay to the Corporation any amounts so advanced if, upon the termination of the matter or matters as to which such advances were made, such director, officer or person shall not be entitled to indemnification under the preceding paragraph of this Article.

The foregoing right to indemnification shall not be exclusive of any other rights to which any such director, officer or person is entitled under any agreement, vote of shareholders, statute, or as a matter of law, or otherwise.

The provisions of this Article are separable, and if any provision or portion hereof shall for any reason be held inapplicable, illegal or ineffective, this shall not prevent any other provision or portion hereof from applying, and shall not affect any right of indemnification existing otherwise than under this Article.

SIX: No director shall be personally liable to the Corporation or its shareholders for monetary damages for breach of fiduciary duty as a director notwithstanding any provision of law imposing such liability; provided, however, that such limitation on liability will not eliminate or limit the liability of a director (i) for any breach of the director's duty of loyalty to the Corporation or its shareholders, (ii) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law, (iii) under sections 6.41 or 8.32 of Chapter 156D of the Massachusetts General Laws, or (iv) for any transaction from which the director derived an improper personal benefit. If the Massachusetts Business Corporation Law is amended after the effective date of these Articles of Organization, to authorize corporate action further eliminating or limiting the personal liability of directors, then the liability of a director of the Corporation shall be eliminated or limited to the fullest extent permitted by the Massachusetts Business Corporation Law, as so amended.

SEVEN: All shares of Common Stock or Non-Voting Common Stock issued by the Corporation shall, to the extent permitted by the Internal Revenue Code, be deemed issued pursuant to a Plan to Issue Section 1244 Stock.

ARTICLE VII

The effective date of organization of the corporation is the date and time the articles were received for filing if the articles are not rejected within the time prescribed by law. If a later effective date is desired, specify such date, which may not be later than the 90th day after the articles are received for filing:

ARTICLE VIII

The information contained in this article is not a permanent part of the articles of organization.

- a. The street address of the initial registered office of the corporation in the commonwealth:
584 Mountain Street, Sharon, MA 02067
- b. The name of its initial registered agent at its registered office:
Brian Striar
- c. The names and addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

President: Brian Striar

Treasurer: Soozen Tribuna

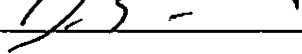
Secretary: Stephanie Striar

Director(s): Ronald D. Greco, Stanley Rosen, Brian Striar, Arthur Blumenthal

- d. The fiscal year end of the corporation:
12/31
- e. A brief description of the type of business in which the corporation intends to engage:
To operate a licensed Medical Marijuana establishment.
- f. The street address of the principal office of the corporation:
584 Mountain Street, Sharon, MA 02067
- g. The street address where the records of the corporation required to be kept in the commonwealth are located is:

584 Mountain Street, Sharon, MA 02067, which is
(number, street, city or town, state, zip code)

- ☐ its principal office;
- ☐ an office of its transfer agent;
- ☐ an office of its secretary/assistant secretary;
- ☒ its registered office.

Signed by: 
(signature of authorized individual)

- ☐ Chairman of the board of directors,
- ☒ President,
- ☐ Other officer,
- ☐ Court-appointed fiduciary,

on this 7th day of June, 2018

COMMONWEALTH OF MASSACHUSETTS

William Francis Galvin
Secretary of the Commonwealth
One Ashburton Place, Boston, Massachusetts 02108-1512

28670

**Articles of Entity Conversion of a
Domestic Non-Profit with a Pending Provisional or
Final Certification to Dispense Medical Use Marijuana
to a Domestic Business Corporation**
(General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

I hereby certify that upon examination of these articles of conversion, duly submitted to me, it appears that the provisions of the General Laws relative thereto have been complied with, and I hereby approve said articles; and the filing fee in the amount of \$475 having been paid, said articles are deemed to have been filed with me this 23 day of May, 2018, at _____ a.m./p.m.
time

Effective date: _____
(must be within 90 days of date submitted)



WILLIAM FRANCIS GALVIN
Secretary of the Commonwealth


Examiner
Name approval

Filing fee: Minimum \$250

TO BE FILLED IN BY CORPORATION
Contact Information:

C

M

Andrew D. Myers, Esq.

Davis, Malm & D'Agostine, P.C.

One Boston Place, 37th Floor, Boston, MA 02108

Telephone: 617-367-2500

Email: amyers@davismalm.com

Upon filing, a copy of this filing will be available at www.sec.state.ma.us/cor. If the document is rejected, a copy of the rejection sheet and rejected document will be available in the rejected queue.

SECRETARY OF THE
COMMONWEALTH
2018 AUG 23 PM 2:35
CORPORATIONS DIVISION

1316152



Commonwealth of Massachusetts
Department of Revenue
Christopher C. Harding, Commissioner

mass.gov/dor

Letter ID: L2123988736
Notice Date: April 10, 2018
Case ID: 0-000-555-086



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



FOUR DAUGHTERS COMPASSIONATE CARE
584 MOUNTAIN ST
SHARON MA 02067-3022

Why did I receive this notice?

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

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

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

What if I have questions?

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

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau

Soozen Tribuna, Stephanie Striar, Ronald D. Greco, Stanley Rosen and Arthur Blumenthal have all resigned their positions as Directors. None of the individuals listed above are executives, managers, persons having direct or indirect authority over the management, policies, security operations or cultivation operations of the Marijuana Establishment. None of the individuals listed above are close associates or members of the applicant. None of the individuals listed above have contributed 10% or more of the initial capital to operate the Marijuana Establishment. None of these individuals hold a relevant managerial, operational or financial interest in the business of the applicant and, by virtue of that interest or power, is able to exercise a significant influence over the management, operations or finances of a Marijuana Establishment licensed under 935 CMR 500.000. The current Directors are reflected on the Secretary of the Commonwealth's website and were all disclosed in the Application of Intent, Background Check Management and Operations Profile Packets.

Liability Insurance

Four Daughters will obtain required liability insurance from Thompson Flanagan, an Illinois based insurance broker, and will execute a policy upon provisional licensure. The policy will contain coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy shall be no higher than \$5,000 per occurrence.

PLYMOUTH

Business Plan Summary

Four Daughters Compassionate Care (“Four Daughters”) will operate a retail establishment in Plymouth. Four Daughters has partnered with Verano Holdings to leverage their expertise in retail medical cannabis to operate the Massachusetts facility. Verano Holdings’ approach and innovations will allow the company to stay ahead of the competition, utilizing Verano’s experience in currently operating state licensed facilities in Illinois, Maryland, and Nevada to make sound business decisions and operate in a responsible and sustainable manner. Verano will foster a culture of collaboration and pride. As a result, the communities in which our facilities are based will yield a vibrant workforce and a robust economy. The name, Verano, which means “summer” in Italian, reflects a warm and sunny mission – to create and sustain a brighter way forward. We view our work and the world in which we live through the lens of endless possibilities. Whether it is the patient in need of medicinal support, an adult-use consumer maintaining a sense of wellbeing and happiness, or a community with the desire to reinvent itself, Verano recognizes that a brighter future is dependent upon the work we do today. Our mission is supported by:

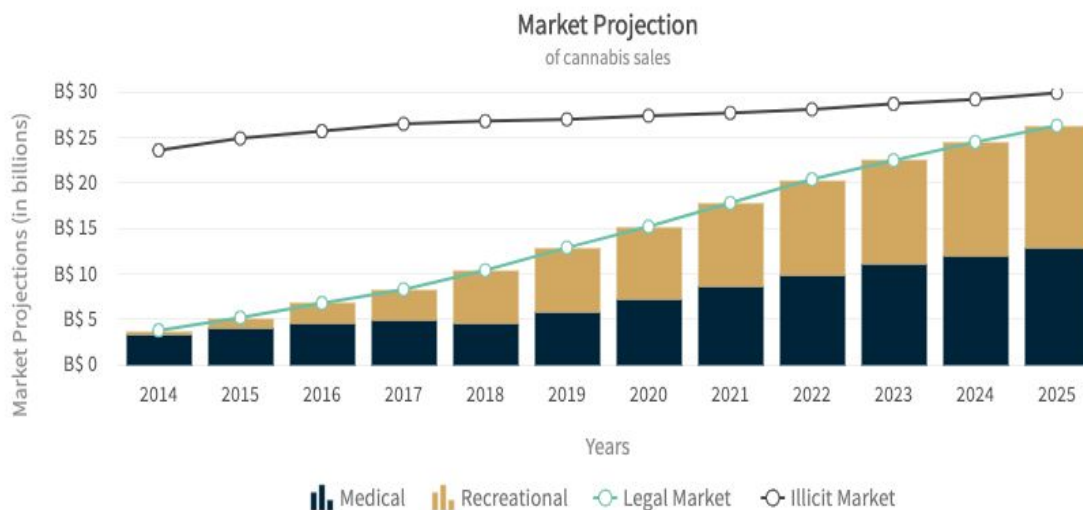
- **A meticulous, forward-thinking business model**, ensuring that each vertically integrated cannabis facility is profitable and sustainable from seed to customer.
- **Corporate social responsibility and community engagement**, entrusting our people with growing the company and its communities into dynamic, viable places to live and work.
- **Innovation and craftsmanship through world-class genetics and proprietary cultivation and manufacturing protocols**, creating pure artisan cannabis products that exceed industry standards and enhance the lives of patients and other adult-use consumers.
- **A corporate culture built on respect, collaboration, a can-do spirit, and a commitment to excellence**, encouraging an open-door policy, pursuit and support of education and training, and pride in every contribution.

Four Daughters was founded by the Striar family in order to provide medicinal marijuana to the patients of the Commonwealth of Massachusetts. The name is a tribute to their four adult daughters who share their parent’s passion for marijuana and helping others within the community. As the industry evolved and adult use cannabis has come to Massachusetts, the Striars sought out partners rich with experience in operations in the cannabis industry to round out their team. After careful thought and deliberation, the Striars decided to partner with the team at Verano Holdings to make their dreams a reality. The Striar Family has deep personal connections to the Plymouth community.

Opportunity Analysis

Nationwide Industry and Growth Potential:

Legal cannabis is the fastest-growing industry in the United States, with a compound annual growth rate of roughly 30 percent – far outpacing the second fastest-growing industry, computer systems design. With legal sales topping \$6 billion in 2017, the cannabis retail market now outperforms annual sales of frozen pizza, and ice cream. The market is primed for continued expansion; cannabis sales could top \$22 billion by 2023. As many experts have noted, the legal cannabis industry represents a once-in-a-generation business opportunity.



Source: Frontier Financial Group

Massachusetts Industry and Growth Potential:

When legal cannabis sales began in the fall of 2018, Massachusetts became the first state east of the Mississippi to launch an adult-use cannabis market, positioning it to become the East Coast center of the U.S. cannabis market. The state's adult-use market has been projected at 1.2 million regular in-state consumers, and that figure does not include the millions of tourists who visit the state each year. A recent statewide study of marijuana use among Massachusetts residents conducted by the Massachusetts Department of Health found that about 21 percent of adults have used marijuana in the past 30 days and that the proportion of marijuana use was highest among younger demographics.

New Frontier Data View: With legal recreational sales slated to begin in July 2018, the recreational side of the market will soon eclipse legal medical sales. Recreational sales are projected to gain steam following the allowance for delivery and social consumption next year, and combined with legal medical sales, annual sales of legal cannabis in Massachusetts are projected to reach an estimated \$1.4 billion by 2025.

Massachusetts Total Legal Cannabis Revenue Projections (\$ in millions)



8

Source: Frontier Financial Group

The financial potential of the state's cannabis industry will escalate as Maine and Vermont also launch adult-use cannabis markets and states such as Connecticut and Rhode Island potentially follow suit, turning the Northeast into a destination for cannabis-related tourism and investment dollars, with Massachusetts at its center. Thanks to these factors, New Frontier Data, a leading cannabis industry analytics company, predicts annual Massachusetts legal cannabis sales could reach \$1.4 billion by 2025.

Target Market

Our facility in Plymouth will target consumers in the Southeastern Massachusetts region.

Market Description:

Four Daughters' Plymouth facility is ideally located. Plymouth, America's Hometown, is the gateway to Cape Cod, allowing the facility to service the busy traffic to and from the vacation destination. The company has plans to collaborate with other stakeholders and the community in the marketing and tourism opportunities presented by Plymouth's ambitious 400th anniversary celebration in 2020.

Most of the communities surrounding Plymouth have issued moratoriums on adult-use cannabis sales. While another adult-use cannabis retailer will be located relatively near to Four Daughters'

Plymouth facility, consumers will have to pass by Four Daughters' location in order to access this other establishment.

Between permanent Plymouth County residents and seasonal residents on Cape Cod, Four Daughters' Plymouth location will have access to a significant consumer base, serving an estimated 13,800 local customers in year one and 23,000 customers in year five.

Brand/Products/Production

Four Daughters' early-to-market advantage will provide it significant advantages in terms of branding and products. While its competition is working through licensing requirements and buildout hurdles, Four Daughters' two retail locations will be able to obtain top dollar for its retail products in the demand-heavy medical and adult-use markets. What's more, as a first mover, Four Daughters will have the time and flexibility to craft its brand, establish customer loyalty, and capture a lasting market share in southeastern Massachusetts. Without the pressures of extensive competition, ultimately Four Daughters, in partnership with Verano's licensed cultivating and manufacturing facilities that are under development in Massachusetts, will be able to leverage the experience of Verano in other regulated markets to prepare for the challenge and adversity in the future and nimble enough to adjust and capitalize on opportunities. Four Daughters will have the time and ability to develop a wide variety of exciting and lucrative product lines, including:

- **Edibles.** Sales of cannabis-infused food products are booming in cannabis markets nationwide. In 2016, sales of edibles increased 121 percent in Washington State, and in Colorado, edible sales tripled from \$17 million in 2014 to \$53 million in 2016.
- **Concentrates.** One of the newest segments of the cannabis market is quickly becoming the most popular. Last year, Colorado concentrate sales increased by 37.5 percent, outpacing edible and flower sales. And much of that growth focused on the high end of the market.
- **Pre-rolled joints.** Consumers are flocking to the convenience of pre-rolled cannabis cigarettes. In 2016, pre-roll sales increased 121 percent in Colorado, Washington, and Oregon.
- **Vape cartridges.** Novice and experienced cannabis users alike are turning to vaporizer pens. Vape cartridge sales in California increased 400 percent between 2015 and 2016.
- **Low- and micro-dose products.** Cannabis shoppers aren't simply looking for the biggest bang for their buck. In Colorado, the growth of products with 5 milligrams or less of THC per serving grew by 83 percent in 2017.
- **Alternative delivery methods.** As the nation's overall smoking rate among adults continues to plummet, consumers are looking to alternative cannabis delivery systems, including transdermal patches applied to the skin and sublingual patches placed under the tongue.

- **Mood-based products.** Cannabis consumers are looking for specific results from their marijuana products. Many of the number-one brands in select categories in California and Colorado are now marketed for specific effects, such as sleep or energy.

As the Massachusetts cannabis industry evolves and more cannabis retailers arrive in the market, Four Daughters' sizeable production capacity will allow it to stay consistent with dropping cannabis prices while still turning a significant profit.

Factoring in average annual spending by medical and recreational consumers, Four Daughters' two retail facilities are estimated to net \$26 million in revenue in year one and nearly \$60 million in net revenue in year five.

Organizational Structure

Four Daughters' management team is uniquely suited for launching and running a therapeutic cannabis operation, boasting more than four decades of executive management experience in Massachusetts healthcare industries. The team's focus on serving the physical, mental and emotional needs of Massachusetts residents and families, plus their extensive philanthropic endeavors, has helped them establish strong and supportive relationships with local host communities.

George P. Archos, *Chief Executive Officer, Director, Individual Responsible for Cultivation*

George Archos is a logistics and operations guru. Building on his extensive experience in coordinating complex freight delivery operations, as well as designing and operating highly-successful restaurants, George entered the cannabis industry in 2014 when he founded Ataraxia Grow and Labs in Illinois and was the first to receive authorization to grow medical cannabis out of 21 recipients of the coveted medical licenses. George's diligence, perseverance, and tireless work ethic have made him one of the cannabis industry's most successful entrepreneurs. Leveraging his unparalleled devotion to quality and a unique results-oriented approach to the cannabis industry, George has overseen the development of some of cannabis's most highly-coveted operations and brands.

George's restaurants across the Chicagoland area bear the imprint of his relentless devotion to quality and unrivaled customer service, earning him multiple awards and recognition. George's unique experience, his admirable drive, and his unrelenting commitment to quality, coupled with his capacity to establish, build, and effectively run multi-jurisdictional companies, are an asset to Verano affiliates nationwide.

Darren Weiss, Esq., *Chief Operating Officer*

Darren is deeply involved in the company's operations at every level and applies his well-honed management and analytical skills across the organization to help streamline processes, standardize operations, and bolster performance. From conceptualization to design and implementation, Darren leverages his many years of regulatory and corporate experience to bring professionalism and efficiency across the organization. A cannabis industry veteran and seasoned

corporate attorney and business advisor, Darren is also a frequent author and speaker on legal and operational issues affecting the legalized cannabis industry and is widely-viewed as a cannabis industry thought leader.

Darren joined the Verano team after leaving his position as a Principal at a large law firm, where he headed up the firm's cannabis practice. Instrumental in the formation and organization of cannabis companies across the U.S., Darren has worked with privately- and publicly-held cannabis companies on corporate financing; drafting and negotiating investment documents, licensing agreements, and vendor contracts; and providing business advice and counsel on competitive licensing applications and cannabis business design and strategy. Darren has been counsel to both investors and cannabis businesses and has helped close multi-million-dollar transactions and provided counsel in the creation of multi-state brands and products.

Darren currently sits on the Executive Committee and Board of the Maryland Wholesale Medical Cannabis Trade Association, was named to the Baltimore Business Journal's 40 Under 40 List, was awarded the 2016 Innovator of the Year prize, and is identified as a 2017 People to Know in the Law. Darren received his bachelor's degree *magna cum laude* from Washington University in St. Louis and his Juris Doctorate *cum laude* from George Mason University School of Law. Prior to law school, Darren worked as a consultant providing performance management and business operational consulting services for public and private-sector clients.

Sam Dorf, Esq., *Director*

A cannabis industry veteran and architect of some of the most impactful deals in the space, Sam Dorf, Esq., serves as Verano's Chief Strategy Officer. Born and raised in the Chicagoland area, Sam is widely recognized as one of cannabis's most successful merit-based application strategists, adept at building and coordinating local teams, lining up funding and real estate assets, and working with local municipalities to create the strongest applicant teams. Over the past 5 years, Sam has propelled Verano's exponential growth with wins in Illinois, Maryland, Nevada, Pennsylvania, and most recently Ohio.

In addition to heading up Verano's expansion through merit-based applications, Sam has proven masterful in coordinating strategic mergers and acquisitions, increasing Verano's market penetration in states where it currently operates as well as new markets that bolster the company's national smart-growth expansion strategy. In this pursuit, Sam has successfully raised over \$40M and obtained 19 licenses spanning five states. Sam is also integral to the creation, design, and development of Verano's diverse brands and products. From inception to execution, Sam works with Verano's team of professionals to ensure that the company's products are best-in-class in each vertical and has been indispensable to Verano's stellar reputation as the creator and producer of top-shelf brands and products.

Brian Striar, *Founder and General Manager, Director*

Brian is guided by a family legacy that includes owning and managing both Westwood Lodge Hospital and Pembroke Hospital until the late 1980s. He has more than 30 years' experience acquiring and managing the diverse investments of the Striar Group, including real estate

development, property management, retail product development, and service industry operations. Through the family's philanthropic wing, he helped launch and manage the Striar Jewish Community Center and Striar YMCA, both state-of-the-art facilities promoting community wellness and well-being.

As a cancer survivor who has watched multiple members of his immediate family battle cancer and chronic disease, Brian is a passionate cannabis activist. For the past nine years, he has actively lobbied for Massachusetts cannabis reforms, promoted social awareness of medical marijuana's many proven benefits, and researched cutting-edge cannabis cultivation, extraction, and processing techniques. He is an active National Cannabis Industry Association member and has presented and studied at cannabis industry conferences in Denver, Las Vegas, New York City, Oakland, and Seattle.

Proposed Timeline

Four Daughters plans to be operational in Plymouth within 120 days of receiving a provisional license. Four Daughters will begin construction within 30 days of approval by the CNB. We estimate that construction will be complete within 30-60 days. During the interim, Four Daughters will work on badging our employees and upon Final Licensure will upload all inventory into METRC before receiving final approval from the CNB to open to the public.

Financial Projections

Plymouth Retail Facility

Four Daughters Compassionate Care, Inc.

PROJECTED INCOME STATEMENTS

	Year 1	Year 2	Year 3
Annual Flower Sales			
Retail Flower Gross Sales Price (per oz)	\$ 400	\$ 400	\$ 400
Pounds of Flower Available for Retail Sale	\$ 2,344	\$ 2,344	\$ 2,344
Ounces of Flower Available for Retail Sale	37,500	37,500	37,500
	\$ -	\$ -	\$ -
Estimated Flower Retail Flower Revenues	\$ 15,000,000	\$ 15,000,000	\$ 15,000,000
Gross Revenues (before COGS)	\$ 15,000,000	\$ 15,000,000	\$ 15,000,000
COGS			
Purchase of Cannabis Flowers	\$ 8,587,500	\$ 8,587,500	\$ 8,587,500
	\$ 8,587,500	\$ 8,587,500	\$ 8,587,500
Gross Profit	\$ 6,412,500	\$ 6,412,500	\$ 6,412,500
General & Administrative Costs			
G&A Wages (Incl. Taxes & Benefits)	124,800	-	-
Allocable Facility Costs (Lease, Taxes, Insurance)	96,000	628,306	629,155
Legal & Professional	40,000	247,200	254,616
Marketing	25,000	51,500	53,045
Security	119,830	76,972	79,281
Allocable Utilities Costs	359,375	370,156	381,261
Other Costs	106,206	109,392	112,674
Total General & Administrative Costs	\$ 871,211	\$ 1,483,526	\$ 1,510,032
EBITDA	\$ 5,541,289	\$ 4,928,974	\$ 4,902,468
Depreciation & Amortization	440,000	540,000	540,000
EBT	\$ 5,101,289	\$ 4,388,974	\$ 4,362,468
Federal Income Taxes	-	-	-
Net Income	\$ 5,101,289	\$ 4,388,974	\$ 4,362,468

SHARON RETAIL CAPITAL REQUIREMENTS

	Year 1	Year 2	Year 3
Facility Buildout	1,000,000	-	-
Permitting	533,667	-	-
Legal/Compliance	50,000	-	-
Ongoing Operating Expenses	31,200	-	-
Contingency Reserve	387,764	-	-
Ongoing Capital Needs			
Total Capital Costs	\$ 2,002,631	\$ -	\$ -

SOURCES & USES OF FUNDS

SOURCES	
Member Cash Contributions	8,000,000
	-
Total Sources of Funds	8,000,000
USES	
Construction and Buildout	1,000,000
Initial Operating Costs	31,200
Contingency	387,764
Total Uses of Funds	1,418,964

Lynne Striar and Stanley Rosen were previously listed in the business plan. They have been removed from the Business Plan. They are not listed in the Application of Intent and Background Check packets because they do not meet any of the categories requiring said disclosure.

Stanley Rosen is employed as the Clinical Director of the Company and thus has gone through the necessary background check in connection with the Four Daughters medical application when he was Chief Operating Officer and a member of the Board of Directors. Stanley subsequently resigned these positions. Stanley will complete Agent Registration once a Provisional License is issued.

Lynne Striar was referenced as the Director of Community Outreach and Co-Founder previously. Lynne is in the process of negotiating her employment with the company. She is a Co-Founder but does not meet the definition of a close associate. Once Lynne is hired by the company, she will complete Agent Registration.

Maintenance of Financial Records

Four Daughters will ensure the accurate accounting and maintenance of all our business records which includes but is not limited to the following:

- Assets and liabilities;
- All monetary transactions;
- Books of account to include: journals, ledgers, supporting documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products;
- Employee salary and wages, stipends to board members, executive compensation, bonus, benefit, or item of value paid to any affiliate; and
- Waste disposal records as per 935 CMR 500.105(12)

All records, manual and electronic, will be preserved and maintained according to the Commission requirements and will be available immediately for inspection as requested.

Personnel Policies, including Background Checks

Four Daughters will implement personnel policies and procedures to ensure a safe, secure, and respectful work environment free from all forms of harassment, discrimination, or hostility. All employees will have a background check prior to hiring. Four Daughters will institute 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.

Four Daughters will implement written policies and train employees on the following, to include but not be limited to:

- Security measures;
- Employee security policies, including personal safety and crime prevention techniques;
- Emergency response protocols, including disaster plan, fire and other emergencies;
- Quality control;
- Workplace hazards;
- Inventory management;
- Customer education;
- Safe and secure handling of products;
- Product tracking system and software;
- Recording keeping;
- Policies and procedures for handling and securing cash;
- Alcohol, smoke, and drug-free workplace policies;
- Policies to prevent diversion of marijuana to those under 21;
- Hours of operation, job descriptions, and staffing plan;
- Opening and closing procedures;
- Prohibited practices;
- Energy conservation methods;
- Acceptable advertising practices; and
- Waste management.

Qualifications and Training

Four Daughters will ensure all agents complete training prior to performing their job. Agent training will be tailored to their roles and responsibilities at our establishment. Four Daughters must provide their agents a minimum of eight (8) hours of training on an annual basis. Training, at a minimum, must include a Responsible Vendor Program in accordance with 935 CMR 500.105(2)(b).

Effective July 1, 2019, in order to be designated as a “Responsible Vendor”, Four Daughters owners, managers, and agents involved in the handling and sale of adult use marijuana must attend and successfully complete a Responsible Vendor Program. New agents hired after 07/01/2019 who will be involved in the handling and sale of adult use marijuana must successfully complete the training within 90 days of their hire date. Four Daughters employees who do not handle or sell adult use marijuana may complete the program on a voluntary basis. Responsible Vendor Training must be successfully re-certified on an annual basis in order to maintain “Responsible Vendor” status.

Responsible Vendor Training.

1. Four Daughters will require owners, managers and employees involved in the handling and sale of marijuana for adult-use to attend and complete the required responsible vendor program;
2. All of said persons will have completed training by the time of licensure or renewal of licensure so as to be designated a “responsible vendor;”
3. Four Daughters shall ensure that all new employees hired thereafter and who are involved in the handling and sale of marijuana for adult use will complete a responsible vendor program within their first 90 days;
4. All Four Daughters personnel designated as a “Responsible Vendor” will be required to complete this program once every year thereafter to maintain designation as a “Responsible Vendor;”
5. Four Daughters will allow for administrative employees who do not handle or sell marijuana to take a “Responsible Vendor” program on a voluntary basis; and
6. Records related to “Responsible Vendor” designations shall be held for four years and made available for inspection by the Commission and any other applicable licensing authorities upon request during Four Daughters' normal business hours.

Certification Training Program Standards

Four Daughters will ensure no Responsible Vendor Program training provider has an interest in our establishment. Responsible Vendor Program training providers must submit their training curriculum to the Commission every two (2) years for content review and approval. Program curriculum must include at least two (2) hours of instructor led training taught in a real-time, interactive classroom. The program instructor must be able to identify and verify each individual attending the training course as well as be responsible for the creation and maintenance of training attendance records. Certification of program completion shall be issued by the entity providing the training. The provider for Four Daughters Responsible Vendor training shall maintain their training records at the principal place of business during the applicable year. The

training program provider shall ensure their records are on file and available for review for a minimum of three (3) years.

Certification Training Class Core Curriculum.

Four Daughters' training course will offer discussions concerning marijuana's effect on the human body.

Training shall include, but not limited to, the following:

- The effects of different types of marijuana on the physical body;
- The average time of impairment;
- Visible signs of impairment;
- How to recognize signs of impairment;
- Diversion prevention and prevention of sales to minors, including best practices;
- Compliance with all tracking requirements;
- Acceptable forms of identification, including:
 - How to verify identification and spot false identification;
 - Medical registration cards issued by the DPH;
 - Four Daughters 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;
 - 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.

Such other areas of training determined by the Commission to be included in a responsible vendor training program.

Restricting Access to Age 21 and Older

Four Daughters will implement policies and procedures to prevent the diversion of marijuana to individuals' youngers than 21 years old as per 935 CMR 500.105(o).

No persons under the age of 21 years of age will be permitted inside the Four Daughters facilities nor will be authorized for employment or be allowed to volunteer. Our security measures will ensure that we can positively identify individuals seeking access to the premises or to whom marijuana products are being transported pursuant to 935 CMR 500.105(14) to limit access solely to individuals 21 years of age or older.

As per 935 CMR 500.140(2), Four Daughters will implement policies to ensure on-premises verification of identification at our retail establishments. Upon entry into our premises by an individual, our qualified agent will immediately inspect the individual's proof of identification and determine the individual's age. An individual will not be admitted to the premises unless our agent has verified that the individual is 21 years of age or older by verification of their identification.

Our proposed location is not within 500 feet of a pre-existing public or private school providing education in kindergarten or any of grades one (1) through twelve (12), as described in 935 CMR 500.110(3).

Advertising and Marketing Plan

Four Daughters will also prohibit any of our marijuana establishment's advertising, marketing, and branding by any means (television, radio, internet, mobile applications, social media, other electronic communication, billboard or other outdoor advertising, or print publication) unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data. None of our advertising, marketing, and branding that utilizes statements, designs, representations, pictures or illustrations will portray anyone younger than 21 years old, nor will any of our advertising, marketing, or branding include, but not limited to, mascots, cartoons, brand sponsorships and celebrity endorsements, which might be deemed to appeal to a person younger than 21 years old as per 935 CMR 500.105(4)(b)(2-4).

Quality Control and Testing

All marijuana will be visually inspected and monitored at all stages of receiving, storing, and dispensing. Four Daughters will ensure that all personnel conducting quality control and testing procedures are properly trained. All marijuana will be tested for cannabinoid profile (e.g., THC, THCA, CBD, etc.) and for contaminants as specified by the CCC including but not limited to mold, mildew, heavy metals, plant-growth regulators and the presence of non-organic pesticides. Four Daughters will maintain the results of testing for at least one year and follow its policy and procedure for responding to results indicating contamination including the potential destruction of contaminated product and identification and assessment of the source of contamination. Four Daughters will put policies in place to recall products in the event of contamination in order to protect the safety of our patients.

Testing

None of our establishment 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. The product will comply with the standards required under 935 CMR 500.160.

Record Keeping Procedures

Four Daughters will keep accurate records in compliance with 935 CMR 500.105(9). Four Daughters will use an advanced seed to sale tracking system meeting Commission requirements and containing multiple traceability systems. Four Daughters will maintain and make available for inspection to the Commission all records required in any section of 935 CMR 500.000, in addition to the following:

- Written Operating Procedures as required by 935 CMR 500.105(1);
- Inventory Records as required by 935 CMR 500.105(8);
- Seed-to-Sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e);
- The following personnel records;
 - Job descriptions for each employee and volunteer position, as well as organizational charts consistent with job descriptions;
 - Personnel record for each Four Daughters agent to include:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - Documentation and verification of all references;
 - Job description to include duties, authority, responsibilities, qualifications, and supervision;
 - Training documentation;
 - Periodic performance reviews;
 - Record of any disciplinary action taken; and
 - Notice of completed responsible vendor and eight-hour related duty training.
 - A Staffing Plan with accessible business hours;
 - Personnel Policies and Procedures;
 - All Background Checks;
- Business Records, which include, but not limited by, the following:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records;
 - Salary and wages paid to each employee, stipends, and/or executive compensation;
- Waste Disposal.

All records will be maintained in a safe and secure location and be maintained according to all Commission and local requirements.

Inventory

Four Daughters will keep up-to-date, real-time records on its inventory as required by 935 CMR 500.105(8). Four Daughters shall set necessary inventory controls and procedures for the purpose of regular inventory reviews, which shall occur on a monthly basis with respect to stored marijuana products. In order to remain compliant, Four Daughters will conduct a thorough and comprehensive written annual review of inventory. Inventory records will account for each date of the inventory, a summary of findings, and the names, signatures, and titles of persons who conduct inventory procedures. All inventory records will be maintained per Four Daughters' recordkeeping policies and procedures in compliance with Commission requirements.

All personnel, business, and inventory records will be maintained in a safe and secure location and be maintained according to all Commission and local requirements.

MOP #5 Quality Control and Testing Procedures - Plymouth

Requirements for Handling of Marijuana

Safety and Sanitization requirement

The Marijuana Establishment authorized to process marijuana will do so in a safe and sanitary manner. The Marijuana Establishment will process the leaves and flowers of the female marijuana plant only, which will be:

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

Sanitary requirements subject to food handler requirements

Any marijuana establishment agent whose job includes contact with the marijuana or nonedible marijuana products, including cultivation, production or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance and Isolation and Quarantine Requirements.

Minimum sanitary requirements while on-duty

Any marijuana establishment agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty including:

1. Maintaining adequate personal cleanliness; and
2. 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 requirements

Hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in the Marijuana Establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices.

Sufficient equipment space as is necessary for sanitary operations

There will be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.

Proper waste disposal requirements

Litter and waste shall be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12).

Building construction should allow for adequate cleaning/repair

Floors, walls and ceilings shall be constructed in such a manner that they will be adequately kept clean and in good repair.

Contact surface/utensil/equipment sanitization

All contact surfaces, including utensils and equipment, shall 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.

Water Supply requirements

The Marijuana Establishment's water supply will be sufficient for necessary operations. Any private water source will be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs.

Plumbing requirements

Plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment. Plumbing will properly convey sewage and liquid disposable waste from the Marijuana Establishment. There will be no cross-connections between the potable and wastewater lines.

Lavatory requirements

The Marijuana Establishment will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair.

Protection of finished products during storage/transportation

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 of their containers.

Edible products prepared in compliance with Minimum Sanitation Requirements for Food Establishments

The Marijuana Establishment, including those that develop or process edible marijuana products, will comply with sanitary requirements. All edible products will be prepared, handled and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments.

Plan to respond to laboratory results that indicate contaminant levels are above acceptable limits established by DPH protocols

The Marijuana Establishment will have a written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the DPH protocols

identified in 935 CMR 500.160(1). The Marijuana Establishment 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 from both the Marijuana Establishment and the Independent Testing Laboratory, separately and directly. The notification from the Marijuana Establishment will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of the contamination.

MOP #6 Maintenance of Financial Records Procedures - Plymouth

Recording Sales

Prohibition of software/methods that manipulate sales data

The Marijuana Establishment/retailer will not utilize software or other methods to manipulate or alter sales data.

Retailer requirement to conduct monthly sales equipment/data software checks

The Marijuana Establishment/retailer will conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. The Marijuana Retailer will maintain records that it has performed the monthly analysis and product it upon request to the Commission.

Reporting requirements for discovery of software manipulation

If the Marijuana Retailer determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:

1. It will immediately disclose the information to the Commission;
2. It will cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
3. Take such other action directed by the Commission to comply with 935 CMR 500.105.

Recordkeeping requirements

The retailer will comply with 830 CMR 62C.25.1: Records Retention Regulation and DOR Directive 16-1 regarding recordkeeping requirements. These require vendors, including those that use a Point of Sale (POS) systems, to record all transactions in a manner that will allow the Department to verify what was sold and whether the appropriate amount of tax was collected.

Separate accounting practices for marijuana and non-marijuana sales

The retailer will adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.

Colocated retailer/medical center to provide bi-annual sales data report for purposes of ensuring adequate marijuana supply

At this time, this application is for a retail establishment only. However, if this changes in the future, and the retailer becomes colocated with a medical marijuana treatment center, the licensee will maintain and provide to the Commission on a biannual basis accurate sales data

collected by the licensee during the six months immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products under 935 CMR 5000.140(10).

DIVERSITY PLAN

Four Daughters Compassionate Care, Inc. (“Four Daughters”) is committed to promoting equity among minorities, women, veterans, people with disabilities and people of all gender identities and sexual orientations. The following is an outline of our goals for our Diversity Plan, the programs we will implement to achieve those goals and specific metrics that will be implemented to assess the progress and success of the programs.

The Four Daughter’s management team will determine the number of roles to be filled during our Phase 1 hiring process. All roles, titles, compensation packages and reporting structures will be outlined during this planning phase. Once all roles are outlined, the hiring team will determine what percentage of open roles are to be filled by candidates meeting our diversity requirements. Four Daughters subscribes to hiring and human resource practices that ensure diversity and opportunity in recruitment, hiring, training, promotion, and lateral movement. The Company will design and implement a clear Diversity and Inclusion Plan along with practical training modules. This will be done in partnership with a recognized minority- and/or woman-owned firm that is experienced in diversity and inclusion strategic planning so as to ensure adherence to our Plan. The Company will develop comprehensive Diversity Plan training before permit issuance and will immediately following permit issuance, begin implementing the plan and training all new hires within 90 days of permit issuance.

We plan to hire at least five (5) diverse candidates. We also intend to utilize a portion of total vendor budget to engage diverse companies, including designated Minority-owned Business Enterprises (MBE) and Women Business Enterprises (WBE). The Company’s management team will meet quarterly to discuss the Company’s diversity status, inclusion plans, overall recruitment efforts, and pursued and missed diversity opportunities. The Company will hire personnel for several positions, upon the issuance of a provisional license, and will immediately begin leveraging community contacts and partnerships to recruit from the most professional and diverse candidate pool possible.

Achievement of this goal can be facilitated by advertising open positions within the Company in diverse publications and tailoring these advertisements to individuals falling into the categories of - minorities, women, veterans, people with disabilities and people of all gender identities and sexual orientations. Some examples of these publications are: *Professional Diversity Network, Diversity Jobs, Beyond.com, Black Jobs, IMB Diversity, Hispanic Today, Hispanic Professional Latino Association, Vet Jobs, Recruit Military, Women for Hire, Military.com, Campus Pride, Out and Equal, Recruit Disability Jobs, and Ability Links.*

Internal Diversity Training

The Company is committed to developing and fostering a safe working environment for all groups, including those marginalized by other industries or aspects of society. The Company recognizes that the foundation for a diverse workforce is education. To that end, the Company will conduct on-site annual diversity training once every quarter. This training will reinforce Company expectations and help prevent harassment or discrimination as well as encourage

employees to recommend employment opportunities to others in the specified demographics.

The Human Resources Director will develop and conduct all diversity trainings and meetings, offering mediation between employees involved in a related issue or concern, investigating all claims pertaining to an employee not complying with the diversity plan, maintaining an internal audit and reporting system that will track the effectiveness of this plan, and evaluating the plan bi-annually to ensure that it is current, effective and followed by all employees.

The Company will develop an inclusive work environment and high-performing, diverse teams. The management team will meet monthly to review and discuss employee performance, team morale, and attrition. By remaining sensitive to employee morale, examining attrition rates and performance metrics, the Company will be able to quantify performance and ensure that diversity on each team is maintained. By evenly distributing opportunities for success and growth across team members and by supporting employees through comprehensive training, the Company is confident that teams will remain diverse while performing at a high level. The Company is committed to creating an environment in which individuals treat each other with equality, dignity, and respect by implementing this goal through diversity initiatives, such as communicating its diversity role model behaviors, providing diversity training, and obtaining senior-level commitment to diversity.

Veterans in the Workforce

The Company is committed to the participation of veterans in the workforce both internally and more generally in the industry. To that end, the Company will focus recruiting efforts at VFW and other veteran-focused organizations including those within the cannabis industry. Twice a year, the Company will sponsor general educational cannabis trainings at these organizations, as well as, more specific job training so that veterans are prepared for their roles in the industry. The Company will designate a veteran employee to create an internal support for veterans at the Company. This group will meet regularly and ensure that employees are getting the necessary professional development to advance within our organization.

Community Partnerships

The Company will develop relationships with diverse community organizations including those that are diversity focused. The Company will identify potential partners within the cannabis community namely, Elevate NE (<https://www.elevatene.org/>) and Equitable Opportunities Now (<http://www.masseon.com/>). Through our Business Membership (Tier 1: \$5000 level) with Elevate NE the Company will partner with Elevate NE to host a workforce and community education program with Elevate NE which will connect individuals in the cannabis industry and showcase opportunities within the Company and the cannabis industry in general. In addition, with our financial contribution to EON, the organization will be able to put on additional trainings, workshops and seminars as well as networking and business events to support diverse entrepreneurs.

The Director of Community Engagement [or designated employee] will meet quarterly with upper management to discuss engagement efforts with community organizations, overall outreach outcomes, and pursued and missed opportunities. The Company is confident that we

can build upon and leverage our existing relationships to develop meaningful partnerships with other organizations.

Women in the Workforce

Four Daughters holds as a core tenet a commitment to the equal participation of women at all levels of the cannabis industry, including all levels within our organization. Four Daughters will focus on the training, employment and promotion of women throughout the organization. Four Daughters will create a workforce that is diverse and provides exceptional employment opportunities for women. Twice a year, Four Daughters will host education and community panels focused on the role of women within the cannabis industry. Four Daughters will sponsor events with organizations such as Elevate NE (<https://www.elevatene.org/>) and Equitable Opportunities Now (<http://www.masseon.com/>). Through both the recruitment and education of women throughout the Commonwealth, we will lead by example in promoting equity of women throughout the organization.

The Company will develop and maintain clear written records measuring the company's progress towards reaching diversity goals. At each monthly and quarterly diversity-related meeting, written notes and records will be kept by the appropriate member of the management team. Each meeting, the previous meeting's notes and records will be reviewed and analyzed to quantify progress as the Company develops. The Company will immediately implement written record keeping regarding all diversity-related goals and progress and analyze records, month over month, to evaluate progress. The Company will assign a competent, detail-oriented member of management to keep written records and schedule analysis meetings to document and evaluate progress. Progress toward diversity goals will be evaluated beginning in the company's second quarter of operations.

The Company will be able to demonstrate the success of its diversity programs and achievement of its goals by producing personnel records that reflect the hiring and retention and promotion of diverse individuals. A record of participation by employees in diversity programs and seminars will be maintained. In addition, a listing of partnerships the Company has engaged in will be posted on the Company website and/or the communication method used to communicate with its employees and partners. Records of advertisements in publications and job posting notices will be maintained by the human resources department of the Company and can be produced to the Commission upon request.

Four Daughters will adhere to the requirements set forth in 935 CMR 500.105(4) which details the permitted and prohibited advertising, branding, marketing and sponsorship practices.

No action taken or program instituted by Four Daughters will violate the Commission's regulations with respect to limitations on ownership or control of other applicable state laws.



Cannabis Control Commission
101 Federal St 13th floor
Boston, MA 02110

April 18, 2019

Dear Cannabis Control Commission:

It is with great pleasure that we accept a business membership enrollment and any additional donations offered from Four Daughters as they prepare to open adult use cannabis retail stores in Massachusetts.

ELEVATE was created to support the Northeast US's growing cannabis industry and the corresponding need for workforce and community education, advocacy and networking, ELEVATE provides a variety of exceptional events and experiences that connect attendees and elevate the perception of what cannabis professionals are and can do.

And because cannabis businesses cannot succeed without inclusion of multiple perspectives, an educated community, and informed customer base, ELEVATE's mission is to empower underrepresented populations to work and lead in the cannabis industry, and to empower our communities to be educated customers and responsible consumers.

Currently in the process of becoming a registered 501(c)(3) nonprofit organization, all proceeds collected from ELEVATE event ticket and sponsorship sales are kept local and reinvested in the cannabis community.

We will use these resources and our relationship with Four Daughters to offer more educational events around Massachusetts and more scholarship opportunities for underrepresented communities we support. We have been able to offer nearly 2:1 ratio of paid students to scholarship recipients in the past two long form educational programs. Additional funding to our organization right now will help us bring more experts in from other states, more opportunities for us to lobby and support local community involvement.

We look forward to working with Four Daughters in 2019!

Thank you,

ELEVATE Northeast Leadership Team



Equitable Opportunities NOW
4186 Washington Street, Roslindale, MA 02131

Cannabis Control Commission
101 Federal St 13th floor
Boston, MA 02110

June 26, 2019

Dear Cannabis Control Commission:

This letter is to confirm that The EON Foundation will be accepting from Four Daughters a \$5,000 donation to support programming planned for the community for the second half of 2019.

The EON Foundation is a registered 501(c)(3) nonprofit organization dedicated to increasing equity in the cannabis industry. One way that The EON Foundation pursues this goal is by supporting individuals from marginalized communities and those who have been disproportionately impacted by cannabis prohibition in their quest to work in the cannabis industry or become owners. The EON Foundation has in the past held trainings, workshops, and seminars on different facets of the industry, as well as networking and business events to support equity entrepreneurs in the space. The donation from Four Daughters will be used to conduct similar programming and job trainings in the upcoming months.

Sincerely,

The EON Foundation

DIVERSITY PLAN

Four Daughters Compassionate Care, Inc. (“Four Daughters”) is committed to promoting equity among minorities, women, veterans, people with disabilities and people of all gender identities and sexual orientations (i.e. LBGTQ+). The following is an outline of our goals for our Diversity Plan, the programs we will implement to achieve those goals and specific metrics that will be implemented to assess the progress and success of the programs.

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D-SOP-18: Personnel and Staffing

Introduction

Zen Leaf intends to staff the facility using our Diversity and Positive Impact Plans as guides. Further personnel policies and procedures for Zen Leaf can be found in the company handbook.

Scope and Purpose

This policy and procedure applies to management and all employees. The purpose is to ensure that requirements are followed for all personnel and staffing matters.

Abbreviations and Definitions

None.

Guidance and Policy

A. Staffing Plan

1. Management and human resources will hire appropriate employees to fully staff the facility.
2. These positions may include, but are not limited to, general manager, assistant managers, and care advisors.

B. General Manager

3. The general manager duties and responsibilities may include:
 - a. Managing the day-to-day operations of the facility, including employee management, working with utility providers to ensure continuous provision of services, maintaining steady cash flow and daily bank transactions.
 - b. Ordering product and maintaining a variance free inventory, both entry and exit.
 - c. Managing employment functions such as performance management, recruitment, interviewing, hiring, training, performance reviews, scheduling, discipline, termination, benefits counseling and exit counsel.
 - d. Supervising all operations facility, particularly the implementation of policies and procedures.
 - e. Training and cross-training dispensary staff regarding day-to-day operational procedures and policies.

C. Assistant Manager

1. Assistant manager duties and responsibilities may include:



Standard Operating Procedures (“SOPs”)

Zen Leaf – Plymouth



- a.** Under the direction of the general manager, the assistant manager will be able to perform the exact duties and responsibilities delineated above as the general manager.
- b.** Overseeing the performance and adherences of all care advisors with regard to policies and procedures.
- c.** Ensuring all employees are prepared to execute daily tasks.
- d.** Assisting the general manager, particularly with duties involving the receipt of deliveries and handling of cash.

D. Care Advisor

- 1.** Care advisor duties and responsibilities may include:
 - a.** New and current customer consultations
 - b.** Recommending products and designing product regimens
 - c.** Point-of-Sale and cash handling.
 - d.** Daily counts of physical inventory
 - e.** Maintaining a clean environment

D-SOP-23: Training Schedule

Introduction

Zen Leaf has established these procedures to detail new hire onboarding, which is crucial for achieving new employee success.

Scope and Purpose

This policy and procedure applies to all employees. It is intended to train new hires so they know how to perform their assigned role duties.

Abbreviations and Definitions

A. POS: Point-of-Sale system

Guidance and Policy

- B.** Per Massachusetts state law, all employees will be subject to eight (8) hours of training before commencing work.
- C.** Eight (8) hours of training will occur annually thereafter.

New Hire Training Procedures

A. Day 1:

- 1.** Introduction: Meet and Greet with Team
 - a.** The team will meet the new hire and welcome them to the team
- 2.** Facility Tour: Detailed View and Explanation of Every Room in Facility Including Security and Safety Information:
 - a.** Panic button
 - b.** Camera locations
 - c.** Proper door access
 - d.** Man trap vestibule information
 - e.** The new hire will get familiar with the facility layout and more importantly the importance of safety and security. Anything can happen at any time and because of this we need to show the new hire where the panic buttons are as fast as possible with a quick training of how to use them. At this point the new hire can also be trained on the immediate emergency protocols within the facility. Always be prepared.
- 3.** Review Employee Handbook and Sign Company Acknowledgement
 - a.** New hire will read employee handbook and sign off. We can also count these as training hours

B. Day 2:

- 1. Review Previous Day’s Training/Ask & Answer Questions**
 - a.** The team will be sure to answer any questions new hire may have on the previous day’s training.
 - b.** Ask the new hire questions about previous day’s training
- 2. Cleaning/Operational Maintenance Details**
 - a.** The new hire will fully understand the importance of a clean and operational facility. The use of cleaning supplies, waste removal, replacing light bulbs, climate controls, and office equipment. Printers always need paper and ink. The internet always needs to be on. Music must always be playing in the background.
- 3. Educational Handout: Types of Products**
 - a.** The new hire will read and review
- 4. Educational Handout: Sativa/Hybrid/Indica**
 - a.** The new hire will read and review
- 5. Educational Handout: Cannabinoids**
 - a.** The new hire will read and review
- 6. Educational Handout: Methods of Administration**
 - a.** The new hire will read and review
- 7. Front Desk**
 - a.** The new hire will shadow the front desk to observe patient and caregiver intake protocol and familiarize themselves with all other duties that are handled up front such as the proper way to answer the phone, (Thank You for calling Zen Leaf, how may we assist you today?) and access voicemail
 - b.** The new hire will observe how existing patients and caregivers are checked in, how new information is entered into system and how to sign in vendors
- 8. Privacy and Confidentiality for Customers**
 - a.** Agents will learn not to accept or record any customer personal information other any information which would be required for a recreational use transaction (i.e. DOB)
 - i.** Customer’s voluntary written permission must be given to acquire or record any other customer personal information



Standard Operating Procedures (“SOPs”)
Zen Leaf – Plymouth



9. Menu Intro

- a.** Print out a current paper menu for the new hire to review and take notes on. Focus on the different product categories

10. Vault Walk

- a.** The new hire will walk the vault with menu in hand and have every product explained to them.
- b.** Discuss the different cultivators and best sellers.
- c.** The new hire should gain a wealth of knowledge during the vault walk.
- d.** Expectation: explain the different product categories

11. Menu Intro/Vault Walk

- a.** Will get to know the menu, different cultivators, categories, and products
- b.** Will spend time in vault getting to know where marijuana is located
- c.** Will learn how the vault is separated by cultivator, category, and product
- d.** Will learn how to fill an online pre-order and where that will be stored in the vault

12. Read Intake Procedures

- a.** The new hire will end Day 2 reading and reviewing intake procedures
- b.** Expectation: the new hire will know the proper way to intake both new and existing customers. We can also count these as training hours.



Standard Operating Procedures (“SOPs”)
Zen Leaf – Plymouth



C. Day 3:

- 1. Opening the Facility**
 - a.** Day 3 of training will begin with the new hire observing opening procedures
 - b.** Allow them to participate in cleaning and organizing the facility
- 2. Review Previous Day’s Training/Ask & Answer Questions**
 - a.** The team will be sure to answer any questions new hire may have on the previous day’s training
 - b.** Ask the new hire questions about previous day’s training
- 3. Vault Walk and Menu Quiz**
 - a.** Walk the vault and quiz new hire on products, product categories, best sellers, and cultivators
- 4. Observe POS System**
 - a.** The new hire will shadow the POS system and observe proper procedure
 - b.** This is also an introduction to patient consultations
 - c.** It is important the new hire observes at the POS and how to dispense product
 - d.** Allow the care advisor to interact with the customer
 - e.** Expectation: The new hire will understand the customer flow and proper POS procedures
- 5. Read Open and Close Procedures**
 - a.** The new hire will read and review open and close procedures
- 6. Closing the Facility**
 - a.** Day 3 of training will end with the new hire observing closing procedures.
 - b.** Allow them to participate in the physical counting of the end of day inventory.

D. Day 4:

- 1. Opening the Facility**
 - a.** Day 4 of training will begin with the new hire observing opening procedures
 - b.** Allow them to participate in cleaning and organizing the facility
- 2. Review Previous Day’s Training/Ask & Answer Questions**
 - a.** The team will be sure to answer any questions new hire may have on the previous day’s training
 - b.** Ask the new hire questions about previous day’s training
- 3. Review Previously Observed Consultations**
 - a.** At this point, the new hire has already observed several consultations
 - b.** Discuss what the new hire has seen and heard during the consultations
 - c.** It is important to understand what the new hire is focusing on to better train them moving forward
- 4. Begin Asking Questions/Interact with POS Software**
 - a.** The new hire will again shadow the POS system and observe proper procedure
 - b.** This is a great time for the new hire to start asking some basic questions
 - i.** What do you like about Zen Leaf?
 - ii.** What products work best for you?
 - c.** The team will inform new hire of individuals to whom they can ask questions and those to whom they are prohibited from asking questions
 - d.** Allow the new hire to interact with the POS software
 - e.** They can input data while the care advisor interacts with individuals
 - f.** The new hire can sit in on a consultation if one presents itself to observe only
- 5. Read POS System Procedures**
 - a.** At this point the new hire has experienced several POS transactions
 - b.** Attention to detail is vital and reviewing the POS procedures will emphasize that
- 6. Closing the Facility**
 - a.** Day 4 of training will end with the new hire observing closing procedures
 - b.** Allow them to participate in the physical counting of the end of day inventory



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E. Day 5:

- 1. Opening the Facility**
 - a.** Day 5 of training will begin with the new hire observing opening procedures
 - b.** Allow them to participate in all applicable opening procedures
- 2. Review Previous Day’s Training/Ask & Answer Questions**
 - a.** The team will be sure to answer any questions new hire may have on the previous day’s training
 - b.** Ask the new hire questions about previous day’s training
- 3. New Consultation**
 - a.** The new hire can sit in on a new consultation if one presents itself to observe only
- 4. Front Desk – Intake**
 - a.** The new hire will observe for a short period of time while interacting with the software
 - b.** They will then intake existing customers and, if possible, intake a new customer by themselves
 - c.** Allow the new hire to sign in a vendor, answer the phone, etc.
- 5. Ask Questions/POS Software/Handle Cash**
 - a.** The new hire will continue to observe at the and ask questions
 - b.** Allow them to interact with the software.
 - c.** Intro to counting and handling cash
- 6. Receiving Product**
 - a.** The new hire will observe a delivery
 - b.** Confirm they understand first-in, first-out product dispensation and allow them to put new inventory inside vault
- 7. Read Product Receiving Procedures**
 - a.** The new hire will read the product receiving procedures
- 8. Closing the Facility**
 - a.** Day 5 of training will end with the new hire observing closing procedures
 - b.** Allow them to participate in all applicable closing procedures



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F. Day 6:

- 1. Opening the Facility**
 - a.** Day 6 of training will begin with the new hire observing opening procedures
 - b.** Allow them to participate in all applicable opening procedures
- 2. Review Previous Week’s Training/Ask & Answer Questions**
 - a.** The team will be sure to answer any questions new hire may have on the previous week’s training
 - b.** Ask the new hire questions about previous week’s training
- 3. Intake Quiz**
 - a.** The new hire will take the intake quiz
- 4. Front Desk- Intake**
 - a.** The new hire will observe for a short period of time while interacting with the software
 - b.** Allow them to fly solo when appropriate
- 5. New Consultation**
 - a.** The new hire can sit in on a new consultation if one presents itself to observe only
- 6. POS System Quiz**
 - a.** The new hire will take the POS quiz
- 7. Ask Questions/POS Software/Handle Cash**
 - a.** The new hire will continue to observe at the POS and ask questions
 - b.** Allow them to interact with the software and handle cash
- 8. Receiving Product Quiz**
 - a.** The new hire will take the receiving product quiz
- 9. Receiving Product**
 - a.** The new hire will observe a delivery
 - b.** Allow them to participate in all applicable parts of receiving product
- 10. Closing the Facility**
 - a.** Day 6 of training will end with the new hire participating in all closing procedures

G. Day 7:

1. Opening the Facility
 - a. Day 7 of training will begin with the new hire observing opening procedures
 - b. Allow them to participate in all applicable opening procedures
2. Review Previous Day’s Training/Ask & Answer Questions
 - a. The team will be sure to answer any questions new hire may have on the previous day’s training
 - b. Ask the new hire questions about previous day’s training
3. Emergency Preparedness Quiz
 - a. The new hire will take the emergency preparedness quiz
 - b. Gauge their retainment on this very important procedure
4. Ask Questions/POS Software/Handle Cash
 - a. The new hire will continue to observe at the POS and ask questions
 - b. Allow them to interact with the software and handle cash
5. Closing the Facility
 - a. Day 7 of training will end with the new hire shadowing closing procedures

H. Day 8:

1. Opening the Facility
 - a. Day 8 of training will begin with the new hire shadowing in all applicable opening procedures
2. Review Previous Day’s Training/Ask & Answer Questions
 - a. The team will be sure to answer any questions new hire may have on the previous day’s training
 - b. Ask the new hire questions about previous day’s training
3. New Consultation
 - a. The new hire can sit in on a new consultation if one presents itself to observe only
4. Front Desk- Intake
 - a. The new hire will shadow at the front desk and intake all customers
5. Closing the Facility
 - a. Day 8 of training will end with the new hire shadowing in all closing procedures



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I. Day 9:

- 1. Opening the Facility**
 - a.** Day 9 of training will begin with the new hire shadowing in all applicable opening procedures
- 2. Review Previous Day’s Training/Ask & Answer Questions**
 - a.** The team will be sure to answer any questions new hire may have on the previous day’s training
 - b.** Ask the new hire questions about previous day’s training
- 3. Ask Questions/POS Software/Handle Cash**
 - a.** The new hire will continue to observe at the POS and ask questions.
 - b.** Allow them to interact with the software and handle cash
- 4. Closing the Facility**
 - a.** Day 9 of training will end with the new hire participating in all closing procedures

J. Day 10:

- 1. Opening the Facility**
 - a.** Day 10 of training will begin with the new hire shadowing in all applicable opening procedures
- 2. Review Previous Day’s Training/Ask & Answer Questions**
 - a.** The team will be sure to answer any questions new hire may have on the previous day’s training
 - b.** Ask the new hire questions about previous day’s training
- 3. Final Exam**
 - a.** The new hire will take the final exam that encompasses everything upon which they have been trained.
- 4. Designate the New Hire a Care Advisor**
 - a.** Upon the new hire passing their final exam, they will have officially become a permanent employee
 - b.** At this point, we should feel they are ready to work independently with only minor oversight and continuous training.



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Employee will acknowledge this SOP upon completing their training.

My signature affirms that I have completed all new-hire employee training.

Employee Name: _____

Date: _____

Signature: _____

Supervisor: _____

Date: _____

Signature: _____



D-SOP-24: METRC Training

Introduction

METRC is the designated seed-to-sale software in Massachusetts.

Scope and Purpose

METRC is used for the following:

- A. Tracking:** Monitoring and verifying all cannabis-related inventory from delivery to the facility through the sale to customers.
- B. Traceability:** Allows the user to trace a finished product back to its origin.
- C. Reporting:** METRC allows the user to pull sales reports by product.

Guidance and Policy

- A.** All employees must be trained by a METRC representative or Zen Leaf department manager before using the software.
- B.** METRC also provides numerous training videos online
 - 1.** Schedule training or watch METRC videos at:
<https://www.METRC.com/customer-resources/inventory-video-tutorials/>
 - 2.** METRC videos are also posted on: www.youtube.com

Employee will acknowledge this SOP upon completing METRC training.

My signature affirms that I have completed all METRC training:

Employee Name: _____ Date: _____

Signature: _____

Supervisor Name: _____ Date: _____

Signature: _____

D-SOP-15: Quality Control

Introduction

Quality Control is vital in any organization, especially in the cannabis industry. Quality control will guarantee a high caliber product, consistency, safety and strict compliance with state regulations. It is vital to ensure plant, product and public safety.

Scope and Purpose

This policy and procedure applies to all employees. The purpose is to meet and exceed customers' expectations, which we accomplish by providing clean, safe, and high-quality products.

Abbreviations and Definitions

- A. Commission:** the Massachusetts Cannabis Control Commission
- B. POS:** Point-of-Sale system

Guidance and Policy

- A.** Zen Leaf incorporates systems at various points in business routines that will maximize attempts to sell quality product such as the First-In First-Out (“FIFO”) inventory method, strict testing procedures, communicating with fellow associates, and running inventory reports daily.
- B.** Inventory and quality control are about knowing where your supply is and making sure that everything is accounted for. The majority of manufactured marijuana items will have expiration dates assigned by the vendor that are listed on the packaging exterior. Most vendors will exchange expired product or credit the next order.

Quality Control Procedures

A. Lab Reports

- 1.** No marijuana or marijuana products will be accepted by the company without prior receipt of a lab certificate of analysis.
- 2.** All lab results will be maintained for one year.

B. Expiration Dates

- 1.** When receiving a new product, enter the expiration date into the POS reporting system. This will allow the system to alert an employee if an item is near expiration.
- 2.** If a product is expired, pull all expired products from the shelf and add the products to the quarantine area of the secure room for secure storage until either returned to vendor or disposed in accordance to standard operating procedures.
- 3.** Be sure to correct amounts in inventory seed-to-sale tracking system to ensure they reflect proper physical counts.

4. Contact the vendor to let them know you have outdated product for a store credit or return the product.
5. If returning product to vendor, create electronic manifest for the product to send back to the vendor and follow all standard operating procedures for secure transport.
6. If disposing of the product on site, follow standard operating procedure for disposal of green waste.

C. First-In First-Out (“FIFO” or rotating stock)

1. When stocking newly received items, do so in the FIFO manner to ensure inventory rotation.
2. Check all stored products as well for proper FIFO method. Make sure all labels are facing outward and displays are organized. Remove all unnecessary clutter and make both stockroom and sales floor presentable.

D. Communication

1. Make it a priority to have daily communication with the retail associates on the sales floor. They can keep you informed on what is selling well and what is not.
2. Use this opportunity to inform the retail associates of any product that may be approaching their expiration date so they can push those items.
3. Use customer review and comment cards to see what is working for customers and what is not working.
4. Industry specific websites, such as Weedmaps and Leafly, is another way to get feedback on your dispensary. Make sure to check these daily.

E. Accuracy of Information

1. If the company has any reason to believe that any of the information regarding marijuana and marijuana products supplied is inaccurate, the company recall coordinator will seek clarification or correction before any received products are integrated into fit-for-use supply.

F. Corrective Action

1. If any employee is found not following these procedures:
 - a. Instruct the employee to use the proper procedures immediately.
 - b. Retrain the employee on correct procedures.
 - c. Visually observe the employee follow these processes to ensure that the employee correctly follows the proper procedures.
2. If failure to comply with the policy and procedure continues:
 - a. Begin disciplinary action processes.

D-SOP-13: Recordkeeping

Introduction

Zen Leaf has established these procedures for recordkeeping activities to ensure accurate and safe processes and prevent potential diversion.

Scope and Purpose

This policy and procedure applies to all employees. The purpose is to ensure strict protocols for maintaining all required reports, records, logs, recordings, and other important business data, information, and documentation.

Abbreviations and Definitions

A. Commission: the Massachusetts Cannabis Control Commission

Guidance and Policy

- A.** Zen Leaf will maintain both written and electronic records, as appropriate, and securely store them for a period of at least two (2) years.
- B.** All applicable personnel will be tasked with maintaining records according to company policy.
- C.** The general manager for the facility will oversee all record keeping tasks to ensure company procedures and Massachusetts law and regulations are followed.
- D.** All of the below records will be maintained onsite or electronically.

Recordkeeping Procedures

A. Video Surveillance Recordings

- 1.** Tapes or pictures gathered by the surveillance system will be stored for 90 days and only accessible to the general manager.
- 2.** Recordings will not be destroyed or altered and retained as long as necessary in the event the videos are relevant for any legal or administrative proceeding.

B. Inspections, Servicing, Alteration, and Maintenance Records

- 1.** Inspections will be conducted once a month to ensure all recordkeeping equipment is in good condition
- 2.** Staff will keep written logs of all maintenance activities performed including dates, times, equipment, actions taken, employee name, and ID number

C. Visitor Records

- 1.** Name, visitor ID number, time of arrival and departure, purpose of visit, name and employee ID of escort, areas visited, name of employee visited.

2. A copy of the visitor’s ID will be affixed to the visitor log and maintained with records

D. Seed-to-Sale Tracking Records

1. The following seed-to-sale tracking records will be entered into METRC:
 - a. Marijuana products ready for dispensing;
 - b. Damaged, defective, expired or contaminated marijuana products awaiting disposal
 - c. All marijuana products received into the facility
 - d. All marijuana products transported out of the facility

E. Inventory Records

1. The company will conduct inventories on a monthly and annual basis inventory records will include:
 - a. Date
 - b. A summary of the inventory results
 - c. Names, titles, and signatures of the employees performing the inventory

F. Transport Manifest and Shipping Records

1. Each manifest received by the facility from the transporter will include the following information and be completed in triplicate:
 - a. Name, address, and registration number of licensee
 - b. Names and registration numbers of agents who transported the marijuana
 - c. Name and registration number of the agent who prepared the manifest
 - d. Name, address, and registration number of the Marijuana Establishment receiving the shipment
 - e. Description of the transported products including form, weight, or type
 - f. Mileage of vehicle at departure and arrival at receiving Marijuana Establishment and mileage upon return to home base
 - g. The date and approximate time of departure from licensee
 - h. The date and approximate time of arrival to receiving Marijuana Establishment
 - i. Signature line for receiving agent
 - j. Weight and inventory of shipment before departure and upon arrival
 - k. Date and time the shipment was reweighed and re-inventoried
 - l. Name of agent at receiving Marijuana Establishment who reweighed and re-inventoried shipment
 - m. The transport vehicle’s make, model and license plate number
2. Copies of the manifests will be retained for no less than one year and be made available to the Commission upon request.

G. Waste Disposal Records

1. Agents will create a record of waste disposal which includes:
 - a. Date of disposal
 - b. Type and quantity of marijuana products disposed
 - c. Manner of disposal
 - d. Names of the two (2) people present during disposal
 - e. Signatures of persons present
2. Disposal records must be retained for three (3) years.

H. Business/Financial Records

1. Assets and liabilities
2. Monetary transactions
3. Various journals, ledgers, and supporting documents (such as agreements, checks, invoices, and vouchers)
4. Sales records including quantity, form and cost of marijuana products

I. Personnel Records

1. The facility will maintain a personnel record for each Marijuana Establishment agent which will include:
 - a. Employment application
 - b. Copy of the employee's agent registration identification card, driver's license, Massachusetts state identification, or Massachusetts liquor purchase identification card
 - c. Copy of Massachusetts agent registration application materials
 - d. Reference verification
 - e. Background check
 - f. Job description or employment contact which includes duties, authority, responsibilities, qualifications, and supervision specific to the employee
 - g. Documentation of all required operational training, which includes privacy and confidentiality issues.
 - i. Employee will sign a statement indicating the date, time, and place of such eight (8) hour training, topics reviewed, and name and titles of presenters
 - ii. Proof of completed Responsible Vendor Training
 - h. Performance evaluation records
 - i. Records of any disciplinary actions
 - j. Results of drug tests
 - k. Staffing plan
 - i. Organization charts for the facility with job descriptions
 - l. Personnel policies and procedures
 - m. Employee records will be maintained for at least 12 months after termination or departure



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J. Record Retention

1. All records will be maintained for two (2) years unless otherwise indicated.
2. Physical records will be stored in a secured area to protect the files from tampering or theft.
3. Duplicate or older records will be kept offsite at an appropriate storage facility.

K. Corrective Action

1. If any employee is found not following these procedures:
 - a. Instruct the employee to use the proper procedures immediately.
 - b. Retrain the employee on correct procedures.
 - c. Visually observe the employee follow these processes to ensure that the employee correctly follows the proper procedures.
2. If failure to comply with the policy and procedure continues:
 - a. Begin disciplinary action processes.

D-SOP-05: Sales Interaction

Introduction

Inspiring others drives our mission to capture people’s imaginations, satisfy deep and important life needs, and offer innovative products. We believe marijuana is the most important medicinal plant on earth, supporting human health, wellness, and happiness.

Scope and Purpose

This policy and procedure applies to all employees. It is intended to provide clear instruction on equipment use, transactions, customer service, and the dispensing of marijuana.

Abbreviations and Definitions

- A. Commission:** the Massachusetts Cannabis Control Commission
- B. POS:** Point-of-Sale system

Adult-Use Sales Interaction Procedures

A. Customer Receiving

1. Customers must be 21 years of age or older to enter the facility
2. Potential customers must show their state issued driver’s license or state ID to enter the premises
3. An employee will be stationed at the front door to screen the provided identification before allowing a customer to enter
4. Employees will be trained on how to detect fake IDs
5. Personal information will not be recorded without voluntary written permission from the customer

B. POS System: Limitation on Sales

1. Verify the customer’s identification
2. Customer per state law may not purchase more than one (1) ounce of marijuana or its combined dry weight equivalent in concentrate or edibles per day
 - a. One ounce of flower is equivalent to 5 g of active THC concentrate, including, but not limited to tinctures
 - b. One ounce of flower is equivalent to 500 mg of active THC in edibles
 - c. Topicals and ointments are not subject to a daily sale limitation
 - d. All products sold by the marijuana establishment will be compliant with the potency levels outlined in 935 CMR 500.150
 - e. Leaf Logix has been programed to deny sales that exceed daily limits or potency levels



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C. Right to Refuse

1. A marijuana retailer has the right to refuse to see to customers who do not provide a valid and current ID.
2. If, in the opinion of the selling agent, a sale would put the customer or the public at risk, he or she may refuse to conduct the transaction.
 - a. For example, the customer is attempting to purchase more than the daily limit or the agent senses there is a risk of diversion.

D. Corrective Action

1. If any employee is found not following these procedures:
 - a. Instruct the employee to use the proper procedures immediately.
 - b. Retrain the employee on correct procedures.
 - c. Visually observe the employee follow sales interaction processes to ensure that the employee correctly follows the proper procedures.
2. If failure to comply with the policy and procedure continues:
 - a. Begin disciplinary action processes.