



# Massachusetts Cannabis Control Commission

## Marijuana Cultivator

### General Information:

License Number: MC281283  
Original Issued Date: 02/05/2020  
Issued Date: 03/11/2021  
Expiration Date: 03/13/2022

## ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Jolly Green Inc

Phone Number: 978-502-3740 Email Address: higginsmechanical@comcast.net

Business Address 1: 60 Franklin St

Business Address 2:

Business City: Winchendon Business State: MA

Business Zip Code: 01475

Mailing Address 1: 442 Howard St

Mailing Address 2:

Mailing City: Lunenburg

Mailing State: MA

Mailing Zip Code: 01462

## CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

## PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

## RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

## PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100

Percentage Of Control: 100

Role: Owner / Partner

Other Role: Farming cultivation

First Name: Kyle

Last Name: Higgins

Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity: white

#### ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

#### CLOSE ASSOCIATES AND MEMBERS

Close Associates or Member 1

First Name: Kyle

Last Name: Higgins

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Owner/operator

#### CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Kyle

Last Name: Higgins

Suffix:

Types of Capital: Buildings, Land, Monetary/  
Equity

Other Type of  
Capital:

Total Value of the Capital Provided:  
\$100

Percentage of Initial Capital:  
100

Capital Attestation: Yes

#### CAPITAL RESOURCES - ENTITIES

No records found

#### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

#### DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: Kyle

Last Name: Higgins

Suffix:

Marijuana Establishment Name: Kyle Higgins

Business Type: Marijuana Cultivator

Marijuana Establishment City: Lunenburg

Marijuana Establishment State: MA

#### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 60 Franklin St

Establishment Address 2:

Establishment City: Winchendon

Establishment Zip Code: 01475

Approximate square footage of the Establishment: 3000

How many abutters does this property have?: 17

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

Cultivation Tier: Tier 01: up to 5,000 square feet

Cultivation Environment: Indoor

#### FEE QUESTIONS

Cultivation Tier: Tier 01: up to 5,000 square feet    Cultivation Environment: Indoor

#### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host	Host Community	pdf	5c3f8f023779161b2a86eea6	01/16/2019

Community Agreement	agreement20190116_15015875.pdf				
Community Outreach Meeting Documentation	Community outreach meeting20190213_13543413.pdf	pdf	5c64683ed7a931124ee01e46	02/13/2019	
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant with Local Zoning.pdf	pdf	5c64769a8d16491b5c0f6e2c	02/13/2019	
Certification of Host Community Agreement	Jolly Green Host agreement update20190326_11215589.pdf	pdf	5c9a4504b411c1126cf06d5a	03/26/2019	

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.: \$3

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Positive Impact Plan.pdf	pdf	5d88d453b5ac050335a3b538	09/23/2019

#### ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

#### INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role:	Other Role:
First Name: Kyle	Last Name: Higgins Suffix:
RMD Association: Not associated with an RMD	
Background Question: no	

#### ENTITY BACKGROUND CHECK INFORMATION

No records found

#### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	certificate of good standing.pdf	pdf	5c40bf363d84de123a60d1c5	01/17/2019
Secretary of Commonwealth - Certificate of Good Standing	Certificate good standing Secretary20190117_12502516.pdf	pdf	5c40c0692724e81b5255734d	01/17/2019
Articles of Organization	jolly green articles of organizations20190117_13003636.pdf	pdf	5c40c2c55fd63c1b24eb10a1	01/17/2019
Bylaws	jolly green bylaws20190117_13034624.pdf	pdf	5c40c3789ff0081b4821629e	01/17/2019

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Unemployment Assistance - Certificate of Good standing	Uncertificate.pdf	pdf	600c25c8a4d1c4079996a224	01/23/2021

Secretary of Commonwealth - Certificate of Good Standing	new-secretary-good-standingf.pdf	pdf	600f50b4bb013b0802088cc2	01/25/2021
Department of Revenue - Certificate of Good standing	CertificateGSMATAX.pdf	pdf	60103fb5de284b081c68fed4	01/26/2021

Massachusetts Business Identification Number: 001325206

Doing-Business-As Name:

DBA Registration City:

### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Proposed Timeline	Time line 9:11:1920190911_11360796.pdf	pdf	5d791485816d7b225d159d0f	09/11/2019
Plan for Liability Insurance	Insurance 9:11:1920190911_12013413.pdf	pdf	5d791a747e918b22a66c0693	09/11/2019
Business Plan	Cultivation Business Plan 9:11:19.pdf	pdf	5d791def38be9e227ac54269	09/11/2019
Proposed Timeline	cultivation_operating plan 01:26:21.pdf	pdf	60104a7cacd73907b60f4338	01/26/2021
Plan for Liability Insurance	JGrenewallnsuance2021.pdf	pdf	60104c2da4d1c4079996ab5a	01/26/2021

### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Restricting Access to age 21 and older	Restricting Access to age 21 and older.pdf	pdf	5ae8508875ce440437857b6e	05/01/2018
Inventory procedures	inventory_control_plan_-_1.2_20180405.pdf	pdf	5c6afd6d5fd63c1b24eb46cd	02/18/2019
Maintaining of financial records	record_keeping_plan_-_1.1_20180319.pdf	pdf	5c6b013bd7a931124ee0262b	02/18/2019
Storage of marijuana	distribution_transportation_plan_20190211.pdf	pdf	5c6b2a19b411c1126cf0205b	02/18/2019
Qualifications and training	staffing_and_training_plan_20180403.pdf	pdf	5c6c51a72724e81b5255ab13	02/19/2019
Security plan	security_plan_-_1.2_20180319.pdf	pdf	5c6c5933edbb73122a6160c4	02/19/2019
Prevention of diversion	security_plan_-_1.2_20180319.pdf	pdf	5c6c59535fd63c1b24eb4934	02/19/2019
Transportation of marijuana	distribution_transportation updated 3:26.pdf	pdf	5c9a4773b411c1126cf06d6f	03/26/2019
Personnel policies including background checks	staffing_and_training_plan_updated 3:26:19.pdf	pdf	5c9a489c293a5312448ed35f	03/26/2019
Maintaining of financial records	record_keeping_plan_maintenance procedures.pdf	pdf	5c9a4abd9ff0081b4821e696	03/26/2019
Record Keeping procedures	record_keeping_plan_maintenance procedures.pdf	pdf	5c9a4ae1b411c1126cf06d79	03/26/2019
Quality control and testing	quality_assurance_plan 9:11:19.pdf	pdf	5d792165629a272281d322f2	09/11/2019
Policies and Procedures for cultivating.	cultivation_operating plan 9:11:19.pdf	pdf	5d7932270473c3226f35cc94	09/11/2019
Diversity plan	Diversity Plan 01:03:2020.pdf	pdf	5e0f6e7ab7ff09534ba02057	01/03/2020

## 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:** Jolly Green Inc has moved forward with the previously outlined positive impact plan.

Program #1 has been started by interviewing a number of applicants from communities identified as disproportionately impacted. We have narrowed it down to two applicants. We hope to hire both within the next six months to a year. Jolly Green is operating at a standstill awaiting approval to cultivate and the funds will not be available to hire anyone from impacted communities until approval is given.

Program #2 has been started and we have hired electrical and plumbing contractors from impacted communities to provide services to our facility.

## COMPLIANCE WITH DIVERSITY PLAN

### Diversity Progress or Success 1

**Description of Progress or Success:** Jolly Green Inc has moved forward with the previously outlined Diversity plan.

Program #1 has been started by interviewing a number of applicants from the following demographics, minorities, women, veterans, people with disabilities, people of all gender identities and sexual orientations, such as individuals in the LGBT + community. We have narrowed it down to two applicants. We hope to hire both within the next six months to a year. Jolly Green is operating at a standstill awaiting approval to cultivate and the funds will not be available to hire anyone from diverse communities until approval is given.

### Diversity Progress or Success 2

**Description of Progress or Success:** Program #2 has been started and we have hired electrical and plumbing and other contractors from diverse demographics such as, minorities, women, veterans, people with disabilities, people of all gender identities and sexual orientations and individuals in the LGBTQ + communities to provide services to our facility.

## HOURS OF OPERATION

Monday From: 7:00 AM Monday To: 6:00 PM

Tuesday From: 7:00 AM Tuesday To: 6:00 PM

Wednesday From: 7:00 AM Wednesday To: 6:00 PM

Thursday From: 7:00 AM Thursday To: 6:00 PM

Date generated: 03/25/2021

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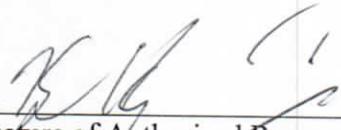
Friday From: 7:00 AM	Friday To: 6:00 PM
Saturday From: 7:00 AM	Saturday To: 6:00 PM
Sunday From: 7:00 AM	Sunday To: 6:00 PM

## Host Community Agreement Certification Form

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

### Applicant

I, Kyle Higgins, (*insert name*) certify as an authorized representative of Jolly Green Inc. (*insert name of applicant*) that the applicant has executed a host community agreement with Winchendon MA (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on January 14, 2019 (*insert date*).

  
Signature of Authorized Representative of Applicant

### Host Community

I, Keith Hickey, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Winchendon MA (*insert name of host community*) to certify that the applicant and Winchendon MA (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on January 14, 2019 (*insert date*).

  
Signature of Contracting Authority or  
Authorized Representative of Host Community

TOWN OF WINCHENDON AND  
Jolly Green, Inc.

**HOST COMMUNITY AGREEMENT**

THIS HOST COMMUNITY AGREEMENT ("AGREEMENT") is entered into this 14 day of January 2019 by and between Jolly Green, Inc., a Massachusetts Domestic Corporation company and any successor in interest, with a principal office address of 60 Franklin St, Winchendon MA 01475 ("the Company"), and the Town of Winchendon, a Massachusetts municipal corporation with a principal address of 109 Front St., Winchendon MA 01475 ("the Town"), acting by and through its Town Manager in reliance upon all of the representations made herein.

WHEREAS, the Company wishes to locate an Adult Use Marijuana Cultivation Establishment at 60 Franklin St. known as ASSESSOR'S MAP 5A2 PARCEL 38, in accordance with and pursuant to applicable state laws and regulations, including, but not limited to 935 CMR 500.00 and such approvals as may be issued by the Town of Winchendon in accordance with its Zoning Article 6.12 and other applicable local regulations; and

WHEREAS, the Company intends to provide certain benefits to the Town of Winchendon in the event that it receives the requisite license THE CANNABIS CONTROL COMMISSION (THE "CNB") or such other state licensing or monitoring authority, as the case may be, to operate Adult Use Cultivation Establishment and receives all required local permits and approvals from the Town;

WHEREAS, the parties intend by this Agreement to satisfy the provisions of G.L. c.94G, Section 3(d), applicable to the operation of an Adult Use Cultivation Establishment, such activities to be only done in accordance with the applicable state and local laws and regulations in the Town of Winchendon;

NOW THEREFORE, in consideration of the mutual promises and covenants set forth herein, and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Company and the Town of Winchendon agree as follows:

**1. Recitals**

The Parties agree that the above Recitals are true and accurate and that they are incorporated herein and made a part hereof.

**2. Annual Payments**

In the event that the Company obtains the requisite licenses and/or approvals as may be required for the operation of an Adult Use Cultivation Establishment and receives any and all necessary and required permits and license from the Town of Winchendon, and at the expiration of any final appeal period related thereto, said matter not being appealed further, which permits and/or

licenses allow the Company to locate, occupy and operate the proposed Adult Use Cultivation Establishment in the Town of Winchendon, then the Company agrees to provide the following Annual Payments: provided, however, that if the Company fails to secure any such other license and/or approval as may be required, or any of the required municipal approvals, the Company shall reimburse the Town for any fees associated with the negotiation of this Agreement.

A. Community Impact Fee

The Company anticipates that the Town of Winchendon will incur additional expenses and impacts on the Town of Winchendon's road and other infrastructure systems, law enforcement, fire protection services, inspectional services, and permitting and consulting services, as well as unforeseen impacts on the Town of Winchendon. Accordingly, in order to mitigate the financial impact on the Town and use of Town resources, the Company agrees to pay a Community Impact Fee to the Town, calculated annually, in the amount and under the terms provided herein.

1. The Company shall pay a Community Impact Fee in an amount equal to three percent (3%) of the total wholesale sales of all products produced by the cultivation and manufacturing operations at the Facility.
2. The Community Impact Fees shall be made quarterly per the Town's fiscal year (July 1- June 30) with a due dates as follows:

<u>Payment</u>	<u>Due Date</u>
Qtr. 1	September 30
Qtr. 2	December 31
Qtr. 3	March 31
Qtr. 4	June 30

The Community Impact Fees for the first quarter of operation shall be prorated. The Community Impact Fees shall continue for a period of five (5) years. At the conclusion of each of the respective five year terms, the parties shall negotiate in good faith the terms of a new Community Impact Fee based on impact costs as an Amendment to this Agreement; provided, however, that if the parties are unable to reach an agreement on a successor Community Impact Fee, the Community Impact Fee specified in Paragraph 2.A.1 of this Agreement shall remain in effect and shall not be reduced below the amount set forth above until such time as the Parties negotiate a successor Community Impact Fee.

3. The Town shall use the above referenced payments in its sole discretion, but shall make a good faith effort to allocate said payments to off-set costs related to road and other infrastructure systems, law enforcement, fire protection services, inspectional services, public health and addiction services and permitting and consulting services, as well as unforeseen impacts upon the Town of Winchendon.

## B. Additional Costs, Payments and Reimbursements

1. Permit and Connection Fees: The Company hereby acknowledges and accepts, and waives all rights to challenge, contest or appeal, the Town of Winchendon's building permit fee and other permit application fees, sewer and water connection fees, and all other local charges and fees generally applicable to other commercial developments in the Town of Winchendon.
2. Facility Consulting Fees and Costs: The Company shall reimburse the Town of Winchendon for any and all reasonable consulting costs and fees related to any land use applications concerning the Facilities, negotiation of this and any other related agreements, and any review concerning the Facility, including planning, engineering, legal and/or environmental professional consultants and any related reasonable disbursements at standard rates charged by the above-referenced consultants in relation to the Facility. Applicant must provide a deposit, to be held in escrow in the amount of \$2,000 to cover costs for the review and processing of the initial application. All remaining escrow funds will be returned to the applicant.
3. Other Costs: The Company shall reimburse the Town of Winchendon for the actual costs incurred by the Town of Winchendon in connection with holding public meetings and forums substantially devoted to discussing the Facility through the Special Permit/Site Plan Approval Process and/or reviewing the Facility and for any and all reasonable consulting costs and fees related to the monitoring and enforcement of the terms of this Agreement, including, but not limited to independent financial auditors and legal fees.
4. Late Payment Penalty: The Company acknowledges that time is of the essence with respect to their timely payment of all funds required under Section 2 of this Agreement. In the event that any such payments are not fully made with ten (10) days of the date they are due, the Company shall be required to pay the Town of Winchendon a late payment penalty equal to five percent (5%) on all outstanding balances.

## C. Annual Charitable/Non-Profit Contributions

*The Company, in addition to any funds specified herein, shall annually contribute the sum of not less than \$5,000.00 to the Eugene M. Connor Post 193 American Legion, 295 School St. Winchendon MA 01475. The Annual Charitable Non/Profit Contribution shall be made quarterly beginning on the first anniversary following the commencement of the operations, and shall continue for the term of this Agreement. Proof of such contribution must be supplied to the town at the time of donation.*

#### **D. Annual Reporting for Host Community Impact Fees and Benefit Payments**

At the time of payment, the Company shall furnish certified copies of all mandated State sales reporting documents to the Town of Winchendon. The Company shall maintain books, financial records, and other compilations of data pertaining to the requirements of this Agreement in accordance with standard accounting practices and any applicable regulations or guidelines of the CNB. All records shall be kept for a period of at least seven (7) years. Upon request by the Town of Winchendon, the Company shall provide the Town of Winchendon with the same access to its financial records (to be treated as confidential, to the extent allowed by law) as it is required by the CNB and Department of Revenue for purposes of obtaining and maintaining a license for the Facility

During the term of this Agreement and for three years following the termination of this Agreement the Company shall agree, upon just cause as determined by the Board of Selectmen or the Town Manager to have its financial records examined, and audited by an Independent Financial Auditor, the expense of which shall be borne by the Company. The Independent Financial Auditor shall review the Company's financial records for purposes of determining that the Annual Payments are in compliance with the terms of this Agreement. Such examination shall be made not less than thirty (30) days following written notice from the Town of Winchendon and shall occur only during normal business hours and at such place where said books, financial records and accounts are maintained. The Independent Financial Audit shall include those parts of the Company's books and financial records which relate to the payment, and shall include a certification of itemized gross sales for the previous calendar year, and all other information required to ascertain compliance with the terms of this Agreement. The independent audit of such records shall be conducted in such a manner as not to interfere with the Company's normal business activities.

#### **3. Local Vendors and Employment**

To the extent such practice and its implementation are consistent with best business practices, and compliant with federal, state, and municipal laws and regulations, the Company will make every effort in a legal and non-discriminatory manner to give priority to local businesses, suppliers, contractors, builders and vendors in the provision of goods and services called for in the construction, maintenance and continued operation of the proposed Adult Use Cultivation Establishment when such contractors and suppliers are properly qualified and price competitive and shall use good faith efforts to hire Town of Winchendon residents.

#### **4. Local Taxes**

At all times during the Term of this Agreement, property, both real and personal, owned or operated by the Company shall be treated as taxable, and all applicable real estate and personal property taxes for that property shall be paid either directly by the Company or by its landlord and neither the Company nor its landlord shall object or otherwise challenge the taxability of such property and shall not seek a non-profit or agricultural exemption or reduction with respect to such taxes.

Notwithstanding the foregoing, (i) if real or personal property owned, leased or operated by the Company is determined to be non-taxable or partially non-taxable, or (ii) if the value of such property is abated with the effect of reducing or eliminating the tax which would otherwise be paid if assessed at fair cash value as defined in G.L. c. 59, §38, or (iii) if the Company is determined to be entitled or subject to exemption with the effect of reducing or eliminating the tax which would otherwise be due if not so exempted, then the Company shall pay to the Town an amount which when added to the taxes, if any, paid on such property, shall be equal to the taxes which would have been payable on such property at fair cash value and at the otherwise applicable tax rate, if there had been no abatement or exemption; this payment shall be in addition to the payment made by the Company under Section 2 of this Agreement.

## **5. Security**

To the extent requested by the Town of Winchendon Police Department, and subject to the security and architectural review requirements of the CNB, or such other state licensing or monitoring authority, as the case may be, the Company shall work with the Town's Police Department in determining the placement of exterior security cameras.

The Company agrees to cooperate with the Police Department, including but not limited to periodic meetings to review operational concerns, security, delivery schedule and procedures, cooperation in investigations, and communications with the Police Department of any suspicious activities at or in the immediate vicinity of the proposed Adult Use Cultivation Establishment, and with regard to any anti-diversion procedures.

To the extent requested by the Town of Winchendon's Police Department, the Company shall work with the Police Department to implement a comprehensive diversion prevention plan to prevent diversion, such plan to be in place prior to the commencement of operations at the Establishment.

## **6. Community Impact Hearing Concerns**

The Company agrees to employ its best efforts to work collaboratively and cooperatively with its neighboring businesses and residents to establish written policies and procedures to address mitigation of any concerns or issues that may arise through its operation of the Facility, including, but not limited to any and all site specific concerns or issues raised at the Company's required Community Outreach Meeting relative to the operation of the Facility; said written policies and procedures, as may be amended from time to time, shall be reviewed and approved by the The Permit Granting Authority (Planning Board) and shall be incorporated herein by reference and made a part of this Agreement, the same as if each were fully set forth herein.

## **7. Additional Obligations**

The obligations of the Company and the Town of Winchendon recited herein are specifically contingent upon the Company obtaining a license for operation of an Adult Use Marijuana Cultivation Establishment in the Town of Winchendon, and the Company's receipt of any and all

necessary local approvals to locate, occupy, and operate an Adult Use Marijuana Cultivation Establishment in the Town of Winchendon.

This agreement does not affect, limit, or control the authority of Town of Winchendon boards, commissions, and departments to carry out their respective powers and duties to decide upon and to issue, or deny, applicable permits and other approvals under the statutes and regulations of the Commonwealth, the General and Zoning BYLAWS of the Town of Winchendon, or applicable regulations of those boards, commissions, and departments or to enforce said statutes, [Bylaws/Ordinances], and regulations. The Town of Winchendon, by entering into this Agreement, is not thereby required or obligated to issue such permits and approvals as may be necessary for an Adult Use Marijuana Cultivation Establishment to operate in the Town of Winchendon, or to refrain from enforcement action against the Company and/or its proposed Adult Use Marijuana Cultivation Establishment for violation of the terms of said permits and approvals or said statutes, BYLAWS, and regulations.

#### **8. Re-Opener/Review**

The Company, as defined in 935 CMR 500.02, shall be required to provide to the Town of Winchendon notice and a copy of any other Host Community Agreement entered into for any establishment in which the Company, has any interest and which is licensed by the CNB as the same type of establishment as the entity governed by this agreement.

In the event the Company enters into a Host Community Agreement for an Adult Use Marijuana Cultivation Establishment with another municipality in the Commonwealth that contains financial terms resulting in payments of a Community Impact Fee or other payments totaling a higher percentage of gross sales for the same type of establishment than the Company agrees to provide the Town of Winchendon pursuant to this Agreement, then the parties shall reopen this Agreement and negotiate an amendment resulting in financial benefits to the Town of Winchendon equivalent or superior to those provided to the other municipality.

#### **9. Support**

The Town of Winchendon agrees to submit to the CNB, or such other state licensing or monitoring authority, as the case may be, the required certifications relating to the Company's application for a license to operate the Facility where such compliance has been properly met, but makes no representation or promise that it will act on any other license or permit request, including, but not limited to any zoning application submitted for the Facility, in any particular way other than by the Town of Winchendon normal and regular course of conduct and in accordance with its rules and regulations and any statutory guidelines governing them.

#### **10. Term**

Except as expressly provided herein, this Agreement shall take effect on the date set forth above, and shall be applicable for as long as the Company operates an Adult Use Marijuana Cultivation Establishment in the Town of Winchendon with the exception of the Community Impact Fee, which shall be subject to the five (5) year statutory limitations of G.L. c.94G, §3(d).

## **11. Successors/Assigns**

The Company shall not assign, sublet, or otherwise transfer its rights nor delegate its obligations under this Agreement, in whole or in part, without the prior written consent from the Town of Winchendon, and shall not assign any of the monies payable under this Agreement, except by and with the written consent of the Town of Winchendon and shall not assign or obligate any of the monies payable under this Agreement, except by and with the written consent of the Town of Winchendon. This Agreement is binding upon the parties hereto, their successors, assigns and legal representatives. Neither the Town of Winchendon nor the Company shall assign, sublet, or otherwise transfer any interest in the Agreement without the written consent of the other.

Events deemed an assignment include, without limitation: (i) Company's final and adjudicated bankruptcy whether voluntary or involuntary; (ii) the Company's takeover or merger by or with any other entity; (iii) the Company's outright sale of assets and equity, majority stock sale to another organization or entity for which the Company does not maintain a controlling equity interest; (iv) or any other change in ownership or status of the Company; (v) any assignment for the benefit of creditors; and/or (vi) any other assignment not approved in advance in writing by the Town of Winchendon.

## **12. Notices**

Any and all notices, consents, demands, requests, approvals or other communications required or permitted under this Agreement, shall be in writing and delivered by hand or mailed postage prepaid, return receipt requested, by registered or certified mail or by other reputable delivery service, and shall be deemed given when so delivered by hand, if so mailed, when deposited with the U.S. Postal Service, or, if sent by private overnight or other delivery service, when deposited with such delivery service.

To Town of Winchendon: 109 Front St. Winchendon MA 01475

To Licensee: 442 Howard St. Lunenburg MA 01460

## **13. Severability**

If any term of condition of this Agreement or any application thereof shall to any extent be held invalid, illegal or unenforceable by a court of competent jurisdiction, the validity, legality, and enforceability of the remaining terms and conditions of this Agreement shall not be deemed affected thereby unless the Town of Winchendon would be substantially or materially prejudiced. Further, the Company agrees that it will not challenge, in any jurisdiction, the enforceability of any provision included in this Agreement; and to the extent the validity of this Agreement is challenged by the Company in a court of competent jurisdiction, the Company shall pay for all reasonable fees and costs incurred by the Town of Winchendon in enforcing this Agreement.

#### **14. Governing Law**

This Agreement shall be governed by, construed and enforced in accordance with the laws of the Commonwealth of Massachusetts, and the Company submits to the jurisdiction of any of its appropriate courts for the adjudication of disputes arising out of this Agreement.

#### **15. Entire Agreement**

This Agreement, including all documents incorporated herein by reference, constitutes the entire integrated agreement between the Company and the Town of Winchendon with respect to the matters described herein. This Agreement supersedes all prior agreements, negotiations and representations, either written or oral, and it shall not be modified or amended except by a written document executed by the parties hereto.

#### **16. Amendments/Waiver:**

Amendments, or waivers of any term, condition, covenant, duty or obligation contained in this Agreement may be made only by written amendment executed by all signatories to the original Agreement, prior to the effective date of the amendment.

#### **17. Headings:**

The article, section, and/or paragraph headings in this Agreement are for convenience of reference only, and shall in no way affect, modify, define or be used in interpreting the text of this Agreement.

#### **18. Counterparts**

This Agreement may be signed in any number of counterparts all of which taken together, each of which is an original, and all of which shall constitute one and the same instrument, and any party hereto may execute this Agreement by signing one or more counterparts.

#### **19. Signatures.**

Facsimile signatures affixed to this Agreement shall have the same weight and authority as an original signature.

#### **20. No Joint Venture:**

The Parties hereto agree that nothing contained in this Agreement or any other documents executed in connection herewith is intended or shall be construed to establish the Town of

Winchendon, or the Town of Winchendon and any other successor, affiliate or corporate entity as joint ventures or partners.

**21. Nullity**

This Agreement shall be null and void in the event that the Company does not locate an Adult Use Retail or Cultivation Establishment in the Town of Winchendon or relocates the Adult Use Marijuana Cultivation Establishment out of the Town of Winchendon, provided, however, that if the Company decides not to locate an Adult Use Cultivation Establishment in the Town of Winchendon. Further, in the case of any relocation out of the Town of Winchendon, the Company agrees that an adjustment of Annual Payments due to the Town of Winchendon hereunder shall be calculated based upon the period of occupation of the Adult Use Cultivation Establishment within the Town of Winchendon, but in no event shall the Town of Winchendon be responsible for the return of any funds provided to it by the Company.

**22. Indemnification**

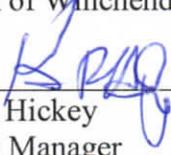
The Company shall indemnify, defend, and hold the Town of Winchendon harmless from and against any and all claims, demands, liabilities, actions, causes of actions, defenses, proceedings and/or costs and expenses, including attorney's fees, brought against the Town of Winchendon, their agents, departments, officials, employees, insurers and/or successors, by any third party arising from or relating to the development of the Property and/or Facility. Such indemnification shall include, but shall not be limited to, all reasonable fees and reasonable costs of attorneys and other reasonable consultant fees and all fees and costs (including but not limited to attorneys and consultant fees and costs) shall be at charged at regular and customary municipal rates, of the TOWN's choosing incurred in defending such claims, actions, proceedings or demands. The Company agrees, within thirty (30) days of written notice by the Town of Winchendon, to reimburse the Town of Winchendon for any and all costs and fees incurred in defending itself with respect to any such claim, action, proceeding or demand.

**23. Third-Parties**

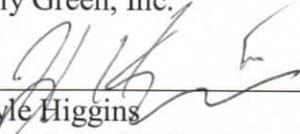
Nothing contained in this agreement shall create a contractual relationship with or a cause of action in favor of a third party against either the Town of Winchendon or the Company.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement on the day and year first written above.

Town of Winchendon

  
\_\_\_\_\_  
Keith Hickey  
Town Manager  
On behalf of the  
Town of Winchendon

Jolly Green, Inc.

  
\_\_\_\_\_  
Kyle Higgins  
On behalf of Jolly Green, Inc.

## 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).

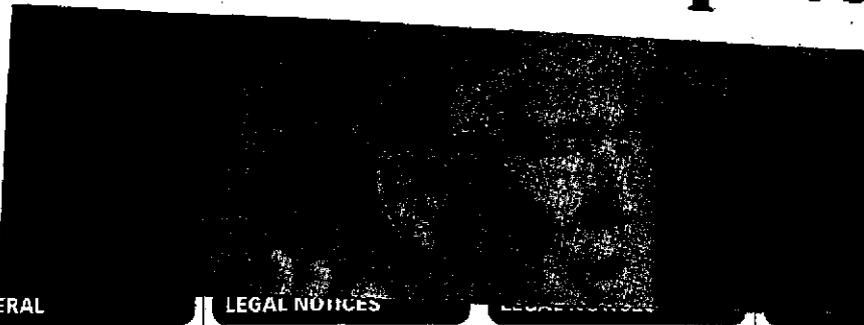
I, Kyle Higgins, (insert name) attest as an authorized representative of Jolly Green Inc. (insert name of applicant) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on January 14, 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 January 4, 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 Dec. 27, 2018 (insert date) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on Dec. 27, 2018 (insert date), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee).

# Trump digs in on wall at surprise

By Lisa Mascaro  
and Catherine Lucey  
The Associated Press

WASHINGTON — President Donald Trump made a surprise appearance in the White House briefing room Thursday on the 13th day of the partial government shut-down, as he continued to dig in his heels over his promised border wall. "Without a wall you cannot have



**GENERAL**

**GENERAL**

## FREELANCE REPORTER

The Gardner News is looking for a Freelance Reporter for coverage in Gardner and surrounding area. If interested, please e-mail letter of interest, resume and writing samples to Managing Editor, Matt Garay at mgaray@thegardnernews.com. Or mail to:

The Gardner News, c/o Matt Garay, Managing Editor  
300 Central Street, Gardner, MA 01440

**DRIVERS & COURIERS**

**DRIVERS & COURIERS**



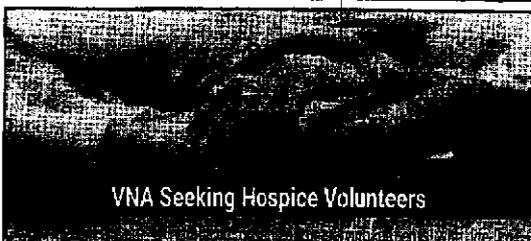
### Part-Time School Van Drivers & Monitors Needed

Van Pool is hiring throughout Massachusetts, with routes in all cities and towns. Earn \$14 - \$15 hourly, plus Attendance Bonuses Monday - Friday split shift, 25-30 hours weekly. Start and end your workday from home! \*On the Job Paid Training \*7D Certificate Assistance. Valid driver's license and good driving record required. Interested in pursuing this opportunity? We welcome you to stop by:

26 Valley Road, Barre, or call (978) 979-4141

[www.vanpoolma.com](http://www.vanpoolma.com)

MA0000077900001



### VNA Seeking Hospice Volunteers

Helping ourselves and our families needs hospice volunteers to provide companionship to patients and respite time for family members. Volunteers are men and women who come from diverse backgrounds and range in age from 20's to 80's, the common bond is a desire to share time and compassion with others. A strong need exists for volunteers who are available during the day, are bilingual, or can provide pet or music therapy. No previous experience is necessary. VNA Hospice Care provides training and on-going support to all volunteers.

Please call 781-569-2611 or find us online at [www.vnahospicecare.org](http://www.vnahospicecare.org)

#### About VNA Care Network Foundation

As the Commonwealth's largest home health and hospice provider, VNA Care Network Foundation serves more than 40,000 patients each year. Founded by Massachusetts' most established and trusted home care organizations, VNA Care Network & Hospice, VNA of Apson, and VNA Hospice Care, VNA Care Network Foundation has the capabilities and resources to deliver a full range of home health, hospice, and community services to patients of all ages and health care needs. VNA Care Network Foundation, a subsidiary of Abtius Health, focuses on promoting the health and well-being of patients and families by providing high-quality, cost-effective health care to vulnerable individuals in their homes and communities.

To Learn more about VNA Care, visit: [www.VNAcare.org](http://www.VNAcare.org) or <http://www.VNAcare.org>

**LEGAL NOTICES**

### TOWN OF ASHBURNHAM CONSERVATION COMMISSION NOTICE OF INTENT

Monday January 14th @ 6:35 PM  
Town Hall Lower Level Meeting Room

There will be a Public Hearing Monday, January 14th at 6:35 p.m. at the Ashburnham Town Hall, Lower Level Meeting Room for a Notice Of Intent filed for 6 Winding Cove Rd. Ashburnham (Assessors Map 48, Parcel 82). The proposed work is for the removal of an existing septic system and construction of a new system within the Buffer Zone of Sunset Lake. This Hearing is being held under the requirements of the Massachusetts Wetlands Protection Act (MGL Ch. 131, Sec. 40) and the Ashburnham Wetlands Protection Bylaw. All abutters and interested parties are invited to attend.

Richard Turcotte  
Conservation Agent

Jan 4-11

### TOWN OF WINCHENDON LEGAL NOTICE

#### Community Outreach Meeting

Notice is hereby given that a Community Outreach Meeting for a proposed Adult Use Marijuana Cultivation Facility is scheduled for January 14, 2019 at 6:30pm at the Winchendon Town Hall at 109 Front St. The proposed Adult Use Marijuana Cultivation Facility is anticipated to be located at 60 Franklin St. (also known as Assessor's Map 5A2 Parcel 38) by Jolly Green, Inc. of the same address. Any person wishing to participate or provide comment is strongly encouraged to attend where there will be an opportunity for the public to ask questions. Reasonable accommodation will be attempted upon written request to the Selectmen's Office prior to the meeting. The meeting room is accessible to persons with disabilities.

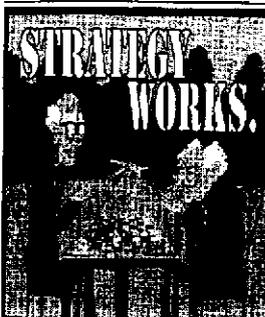
By: Winchendon Board of Selectmen  
Audrey LaBrie, Chair  
(978) 297-0085

Jan 4, 2019

**NOTICE**

Premises: Massachusetts By virtue at a certain m Electronic I East-West I America, N. f/k/a/ Cour gage dated l County (Sov at Page 57, January 6, 2 at Page 385, ment dated Book 56178 & the present gage and for at Public A Time upon scribed in sa A certain p: improvements tion of Oak Templeton, described as Beginning a iron set at Street with f. Thence West erty line of O Thence Nort or formerly c Thence East or formerly pipe in the w Thence Sou erty line of l The descript shall control publication. For Mortgage corded in Bc (Southern Di TERMS OF I subject to al municipal li dence over th TEN THOUS must be pai cashier's che chaser. The cash, certifi within forty f Other terms t Marinucci La 275 West Nati Warwick, RI Attorney for Loans Servic icing, LP Present Holde Telephone: (4 MLG File No.

Dec28, Jan4, 11



**FOR UP-TO-NITE CAREER OPPORTUNITIES, TURN TO THE GARDNER NEWS CLASSIFIEDS!**

The Gardner News  
300 Central Street • Gardner, MA 01440  
978-632-8000  
[advertising@thegardnernews.com](http://advertising@thegardnernews.com)

ATTACHMENT 1

mailed 12/11/18  
RECEIVED  
DEC 27 2018  
DJA  
8:03

TOWN OF WINCHENDON  
LEGAL NOTICE

WINCHENDON TOWN CLERK

*Community Outreach Meeting*

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By: Winchendon Board of Selectmen  
Audrey LaBrie, Chair  
(978) 297-0085

Publication Date: January 4, 2018  
Gardner News

mailed 12/11/18  
RECEIVED  
DEC 27 2018  
DJA  
8:03  
WINCHENDON TOWN CLERK

TOWN OF WINCHENDON  
LEGAL NOTICE

*Community Outreach Meeting*

ATTACHMENT 3

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Audrey LaBrie, Chair  
(978) 297-0085

Publication Date: January 4, 2018  
Gardner News

ATTACHMENT 4

mailed 12-1-18  
RECEIVED  
DEC 27 2018 DJJ  
8:03  
WINCHENDON TOWN CLERK

TOWN OF WINCHENDON  
LEGAL NOTICE

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By: Winchendon Board of Selectmen  
Audrey LaBrie, Chair  
(978) 297-0085

Publication Date: January 4, 2018  
Gardner News



# 300 foot Abutters List Report

Winchendon, MA  
December 04, 2018

## Subject Property:

Parcel Number: 5A2-0-38  
CAMA Number: 5A2-0-38  
Property Address: 60 FRANKLIN ST

Mailing Address: HIGGINS, KYLE & WENDY  
442 HOWARD ST  
LUNENBURG, MA 01462

## Abutters:

Parcel Number: 1-0-242  
CAMA Number: 1-0-242  
Property Address: WINCHENDON

Mailing Address: PAN AM SOUTHERN LLC  
1700 IRON HORSE PARK  
NORTH BILLERICA, MA 01862-1641

Parcel Number: 2D2-0-14  
CAMA Number: 2D2-0-14  
Property Address: LINCOLN AV

Mailing Address: NEW ENGLAND WOODEN WARE CORP  
205 SCHOOL STREET SUITE 201  
GARDNER, MA 01440

Parcel Number: 2D2-0-21  
CAMA Number: 2D2-0-21  
Property Address: 265 LINCOLN AV

Mailing Address: COSWELL, STEPHEN P. & MARIANNE  
TR OF THE STEPHEN & MARIANNE  
P.O. BOX 716  
ASHBURNHAM, MA 01430

Parcel Number: 2D2-0-22  
CAMA Number: 2D2-0-22  
Property Address: 261 LINCOLN AV

Mailing Address: D.A. MFG CO., LLC  
261 LINCOLN AVENUE  
WINCHENDON, MA 01475

Parcel Number: 2D2-0-23  
CAMA Number: 2D2-0-23  
Property Address: FRANKLIN ST

Mailing Address: DROUIN, ALAN J.  
142 GLENALLEN ST  
WINCHENDON, MA 01475

Parcel Number: 2D2-0-24  
CAMA Number: 2D2-0-24  
Property Address: FRANKLIN ST

Mailing Address: UNITED INVESTMENT PROPERTIES L  
158 FRANKLIN ST  
WINCHENDON, MA 01475

Parcel Number: 2D2-0-31  
CAMA Number: 2D2-0-31  
Property Address: 123 FRANKLIN ST

Mailing Address: JAMES B. BIGWOOD LIVING TRUST  
P.O. BOX 342  
WINCHENDON, MA 01475

Parcel Number: 2D2-0-32  
CAMA Number: 2D2-0-32  
Property Address: 111 FRANKLIN ST

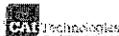
Mailing Address: SOUCY, ROBERT P.  
109 FRANKLIN STREET  
WINCHENDON, MA 01475

Parcel Number: 2D2-0-33  
CAMA Number: 2D2-0-33  
Property Address: 109 FRANKLIN ST

Mailing Address: SOUCY, ROBERT P.  
109 FRANKLIN STREET  
WINCHENDON, MA 01475

Parcel Number: 2D2-0-35  
CAMA Number: 2D2-0-35  
Property Address: 88 MONADNOCK AV

Mailing Address: DESMOND, WALTER F.  
P.O. BOX 396  
WINCHENDON, MA 01475



www.cai-tech.com

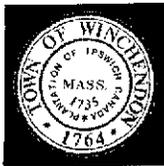
Data shown on this report is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this report.

12/4/2018

Page 1 of 2

Abutters List Report - Winchendon, MA

*Sheri A. DiBuzale BOA 12-4-18*



# 300 foot Abutters List Report

Winchendon, MA  
December 04, 2018

Parcel Number: 2D2-0-36  
CAMA Number: 2D2-0-36  
Property Address: 85 MONADNOCK AV

Mailing Address: PARMENTER, DANNY W.  
680 CENTRAL ST  
WINCHENDON, MA 01475

Parcel Number: 2D3-0-29  
CAMA Number: 2D3-0-29  
Property Address: 75 MONADNOCK AV

Mailing Address: DESMOND, WALTER F.  
P.O. BOX 396  
WINCHENDON, MA 01475

Parcel Number: 5A2-0-219  
CAMA Number: 5A2-0-219  
Property Address: FRANKLIN ST

Mailing Address: WINCHENDON HOUSING AUTHORITY  
108 IPSWICH DRIVE  
WINCHENDON, MA 01475

Parcel Number: 5A2-0-223  
CAMA Number: 5A2-0-223  
Property Address: 50 FRANKLIN ST

Mailing Address: BATOR REAL ESTATE, LLC  
312 MAPLE STREET  
WINCHENDON, MA 01475

Parcel Number: 5A2-0-35  
CAMA Number: 5A2-0-35  
Property Address: JACKSON AV

Mailing Address: NEW ENGLAND WOODEN WARE, CORP.  
  
205 SCHOOL STREET SUITE 201  
GARDNER, MA 01440

Parcel Number: 5A2-0-36  
CAMA Number: 5A2-0-36  
Property Address: 255 LINCOLN AV

Mailing Address: DOIRON WILLIAM B & GAIL M  
37 SPRUCE DRIVE  
ASHBURNHAM, MA 01430

Parcel Number: 5A3-0-360  
CAMA Number: 5A3-0-360  
Property Address: 49 WASHINGTON AV

Mailing Address: PARMENTER, DANNY W. PARMENTER,  
NICOLE A.  
680 CENTRAL ST  
WINCHENDON, MA 01475



www.cai-tech.com

Data shown on this report is provided for planning and informational purposes only. The municipality and CAI Technologies are not responsible for any use for other purposes or misuse or misrepresentation of this report.

12/4/2018

Page 2 of 2

## *Plan to Remain Compliant with Local Zoning*

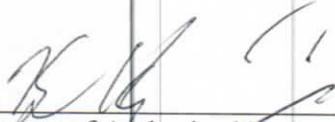
*Jolly Green Inc. will be compliant with Massachusetts cannabis state law 935 CMR 500. Jolly Green Inc will also remain compliant Town of Winchendon's adult-use cannabis zoning law 6.12 While occupying 60 Franklin St Winchendon Ma 01475. We work with the building department's commissioner during construction to obtain local permits as well.*

## Host Community Agreement Certification Form

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

### Applicant

I, Kyle Higgins, (*insert name*) certify as an authorized representative of Jolly Green Inc. (*insert name of applicant*) that the applicant has executed a host community agreement with Winchendon MA (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on January 14, 2019 (*insert date*).



Signature of Authorized Representative of Applicant

### Host Community

I, Keith Hickey, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Winchendon MA (*insert name of host community*) to certify that the applicant and Winchendon MA (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on January 14, 2019 (*insert date*).



Signature of Contracting Authority or Authorized Representative of Host Community

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.



**From:** Kyle Higgins higginsmechanical@comcast.net  
**Subject:** 2021 Update/establishment cost to Host community  
**Date:** January 21, 2021 at 2:26 PM  
**To:** Tracy Murphy tmurphy@townofwinchendon.com

---



Hello Tracy,

We are still waiting for authorization from the Cannabis Commission to start cultivation and would anticipate a letter to do so shortly. I am in the process of renewal of the provisional license and are requesting any records related to cost of Jolly Green Inc to the Town of Winchendon related to our establishment within the community.

Thank you  
Kyle Higgins

**From:** Higginsmech higginsmechanical@comcast.net  
**Subject:** Re: 60 Frankin  
**Date:** December 10, 2020 at 12:28 PM  
**To:** Tracy Murphy tmurphy@townofwinchendon.com



Hi Tracy,

We should have final approval by years end. We will probably start the first crop in February and a very conservative number to carry would be \$600k in sales.

Thanks  
Kyle

Sent from my iPhone

On Dec 10, 2020, at 12:20 PM, Tracy Murphy <tmurphy@townofwinchendon.com> wrote:

Hi Kyle-

I hope this finds you well. It's 2022 budget time here at Town Hall. Keith is building his budget and trying to anticipate the amount of the town's 3% from your operation. Do you have any projections for the period, July 1, 2021-June 30, 2022?

Thanks!

Tracy Murphy  
Director of Planning & Development  
Town of Winchendon  
109 Front St.  
Winchendon MA 01475  
1-978-297-5414

E-mail sent or received via the Town of Winchendon network are subject to disclosure under the Massachusetts Public Records Law (M.G.L. Chapter 66, Section 10) and the Federal Freedom of Information Act.

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01/22/21

CCC

2 WASHINGTON SQUARE  
WORCESTER MA 01604

To Whom It May Concern:

Jolly Green Inc. has emailed on 01/21/21 Tracy Murphy Town of Winchendon to inquire if any cost has been incurred by our facility. To date we have not had a reply from our host community.

SINCERELY,

KYLE HIGGINS



**From: Kyle Higgins** higginsmechanical@comcast.net  
**Subject: 2021 Update/establishment cost to Host community**  
**Date: Jan 21, 2021 at 2:26:41 PM**  
**To: Tracy Murphy** tmurphy@townofwinchendon.com

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**Thank you**  
**Kyle Higgins**

**Positive Impact Plan**  
**Jolly Green Inc**  
**60 Franklin St Winchendon MA 01475**

**About us:**

Jolly Green was established in 2018 for the purpose of adult use cannabis cultivation and is located at 60 Franklin St. Winchendon Massachusetts, and applying for a tier one cultivation license. Furthermore, within a two-year time frame we are planning on applying for a tier two license for a 2<sup>nd</sup> location at 246 Suffolk Lane at Gardner Massachusetts.

Through the legalization of cannabis this has created an opportunity for many small businesses to come into existence. In doing so establishing well-paying jobs within Massachusetts in the cannabis industry. Currently Jolly Green is startup owner operated company and intends on creating jobs and supporting businesses from areas negatively impacted by the legalization of cannabis.

I feel we have a moral and ethical obligation to society. Thus, Jolly Green will promote a positive impact in communities identified as disproportionately impacted by the prohibition of cannabis. This will be done by the following Positive Impact plan that is outlined.

**Positive Impact Plan Goals:**

- Jolly Green will provide a positive impact on communities located in areas of disproportionate impact by the prohibition of cannabis, such as Fitchburg and Worcester Massachusetts. Jolly Green will help increase the number of individuals working in the cannabis industry from these communities. Our plan is to hire 1 # individual per year from the above identified communities.
- Jolly Green will promote a positive impact on communities disproportionately impacted by the prohibition of cannabis in our external business operations. By contracting and using vendors located in the communities of Worcester and Fitchburg Massachusetts.

This will be accomplished by contracting out 50% of our vendors from the Fitchburg and Worcester communities.

**Programs:**

**Promoting community positive impact within Jolly Green internal business operations:**

- Jolly Green will provide a positive impact on areas disproportionately impacted by the prohibition of cannabis in its internal business operations. Jolly green will give hiring preference to individuals that fall under the Commissions definition of disproportionately impacted areas. This process will include Jolly Green attending Career Fairs to attract potential employees. The career fairs will be marketed directly in communities identified as disproportionately impacted areas such as Worcester and Fitchburg Massachusetts. Jolly Green will attend 2 # job fairs per year.

**Promoting community positive impact within Jolly Green external business operations:**

- Jolly Green will create an economic opportunity for individually owned businesses located in communities identified as disproportionately impacted areas. We will research and establish business relationships in communities such as Fitchburg and Worcester Massachusetts. Jolly Green intends on establishing business relationships with 50% or more vendors from the above listed communities.

## **Measurements and accountability:**

- **Program #1**

Employee community positive impact program, Jolly Green compliance management will review and perform internal audits 4 times a year to ensure progress towards positive impact goals.

Jolly Green will attend career fairs that are marketed directly in communities identified as disproportionately impacted areas such as Worcester and Fitchburg Massachusetts. Jolly Green intends on employing one or more individuals from these identified communities over the first year. Jolly Green will count the number of individuals who have been hired annually. This will be done to ensure we meet our goal of hiring 1 # individual from the above listed communities per year. The process will commence 60 days after obtaining provisional license.

- **Program #2**

Vendor and contractor positive impact program, Jolly Green compliance management will review and perform an audit 4 times per year to ensure progress towards vendor and contractor positive impact goals. Jolly Green will procure vendors and contracts with business owners located in communities identified as disproportionately impacted such as Worcester and Fitchburg Massachusetts. Jolly Green intends on hiring and contracting with 50 % or more vendors utilizing this program over the first year. Jolly Green will count the number vendors who have been hired annually. This will be done to ensure we meet our goal of hiring 50% or more vendors from the above listed communities per year. The process will commence 60 days after obtaining provisional license.

## **Jolly Green Inc required acknowledgements:**

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





mass.gov/dor

## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



KYLE HIGGINS  
JOLLY GREEN INC  
25 NEW ATHOL RD  
ORANGE MA 01364-9602

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

The Commissioner of Revenue certifies that, as of the date of this certificate, JOLLY GREEN 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](http://mass.gov/dor) to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:

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

Edward W. Coyle, Jr., Chief  
Collections Bureau



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

William Francis Galvin  
Secretary of the  
Commonwealth

Date: January 16, 2019

To Whom It May Concern :

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

**JOLLY GREEN, INC.**

is a domestic corporation organized on **April 30, 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 cursive script that reads "William Francis Galvin".

Secretary of the Commonwealth

Certificate Number: 19010286290

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

Processed by:



**The Commonwealth of Massachusetts  
William Francis Galvin**

Minimum Fee: \$250.00

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

**Articles of Organization**

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

Identification Number: 001325206

**ARTICLE I**

The exact name of the corporation is:

JOLLY GREEN, INC.

**ARTICLE II**

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. C156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:

**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.

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		Num of Shares	Total Par Value	
CWP	\$0.00100	100	\$0.10	100

G.L. C156D eliminates the concept of par value, however a corporation may specify par value in Article III. See G.L. C156D Section 6.21 and the comments thereto.

**ARTICLE IV**

If more than one class of stock is authorized, state a distinguishing designation for each class. Prior to the issuance of any shares of a class, if shares of another class are outstanding, the Business Entity must provide a description of the preferences, voting powers, qualifications, and special or relative rights or privileges of that class and of each other class of which shares are outstanding and of each series then established within any class.

**ARTICLE V**

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

**ARTICLE VI**

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

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

#### ARTICLE VII

The effective date of organization 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.

Later Effective Date: Time:

#### ARTICLE VIII

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

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

Name: KYLE HIGGINS  
No. and Street: 279 HOLLY DRIVE  
City or Town: WINCHENDON State: MA Zip: 01475 Country: USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	KYLE HIGGINS	60 FRANKLIN ST. WINCHENDON, MA 01475 USA
TREASURER	KYLE HIGGINS	60 FRANKLIN ST. WINCHENDON, MA 01475 USA
SECRETARY	KYLE HIGGINS	60 FRANKLIN ST. WINCHENDON, MA 01475 USA
DIRECTOR	KYLE HIGGINS	60 FRANKLIN ST. WINCHENDON, MA 01475 USA

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

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

AGRICULTURE- FARMING.

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

No. and Street: 60 FRANKLIN ST.  
City or Town: WINCHENDON State: MA Zip: 01475 Country: USA

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

No. and Street: 60 FRANKLIN ST.

**ACTION BY UNANIMOUS WRITTEN CONSENT IN  
LIEU OF FIRST MEETING BY THE BOARD OF DIRECTORS  
OF  
Jolly Green, Inc.,  
a Massachusetts Corporation**

The undersigned, constituting all of the members of the board of directors (the "Board") of Jolly Green, Inc., a Massachusetts corporation (the Corporation), in lieu of holding a meeting of the Board, hereby consent to the taking of the actions set forth herein, and the approval and adoption of the following resolutions by this unanimous written consent ("Written Consent") pursuant to Section 8.21 of the Massachusetts Business Corporation Act:

Articles of Organization

RESOLVED, that the Articles of Organization of the Corporation filed with the Massachusetts Secretary of State hereby are adopted, ratified and affirmed in all respects.

RESOLVED FURTHER, that the Secretary of the Corporation is authorized and directed to insert a certified copy of the Articles of Organization in the Corporation's minute book.

Adoption of Bylaws

RESOLVED, that the bylaws presented to the Board and attached hereto are adopted as the bylaws of the Corporation ("Bylaws") to (i) regulate the conduct of the Corporation's business and affairs, and (ii) amend, restate, and supersede the Corporation's prior existing bylaws, if any, in their entirety.

RESOLVED FURTHER, that the Secretary of the Corporation is hereby authorized and directed to execute a certificate of the adoption of the Bylaws, to insert the Bylaws as so certified and as may be amended from time to time, in the minute book of the Corporation and to see that a copy, similarly certified, is kept at the principal executive office for the transaction of business of the Corporation, as required by law.

**ACTION BY WRITTEN CONSENT  
OF THE SOLE INCORPORATOR**

**OF**

**Jolly Green, Inc.,**

a Massachusetts Corporation,

May 11, 2018

The undersigned, acting as the sole incorporator of Jolly Green, Inc., a Massachusetts corporation (the "Corporation"), hereby approves and adopts the following resolutions by this written consent without a meeting (this "Written Consent") pursuant to Section 2.05 of the Massachusetts Business Corporation Act, which shall be effective upon the commencement of the corporation's existence:

RESOLVED, that each person named below is hereby elected to serve as a director of the Corporation until such time as his or her successor is duly elected and qualified:

Kyle Higgins

RESOLVED FURTHER, that the officers of the Corporation, as elected by the Corporation's Board of Directors, are authorized and directed to insert a copy of this Written Consent in the minute book of the Corporation.

RESOLVED FURTHER, that the undersigned, the sole incorporator of the Corporation, hereby resigns as the incorporator of the Corporation, effective upon the commencement of the corporation's existence.

IN WITNESS WHEREOF, the undersigned executes this Written Consent as of the date set forth above.



---

By: Cheyenne Moseley, Assistant Secretary  
LegalZoom.com, Inc., Sole Incorporator

Stock Issuance

RESOLVED, that the officers of the Corporation are hereby authorized to issue and sell shares of common stock of the Corporation, \$0.001 par value (the "Shares"), which the Board hereby determines to be the fair market value of the Corporation's common stock as of the date hereof, to each person named below (the "Shareholder"), in the amounts specified opposite each name in exchange for cash or contributed property as follows:

<u>Name of Shareholder</u>	<u>Number of Shares</u>	<u>Total Purchase Price(\$)</u>
Kyle Higgins	100	\$100.00

RESOLVED FURTHER, that the Board hereby determines that the consideration to be received for the above-mentioned Shares is adequate for the Corporation's purposes, and that the sale and issuance of the Shares to each of the above-named persons shall be conditioned upon receipt by the Corporation of the purchase price of said Shares and final copies of all appropriate documentation required by Corporation.

RESOLVED FURTHER, that upon the issuance and sale in accordance with the foregoing resolutions, such Shares shall be validly issued, fully paid and non-assessable shares of common stock of the Corporation.

RESOLVED FURTHER, that the officers of the Corporation are hereby authorized and directed, for and on behalf of the Corporation, (i) to take all actions necessary to comply with applicable laws with respect to the sale and issuance of the Shares, (ii) to thereafter execute and deliver on behalf of the Corporation, pursuant to the authorization above, share certificates representing the Shares set forth above, and (iii) to take any such other action as they may deem necessary or appropriate to carry out the issuance of the Shares and intent of these resolutions.

Election of Officers

RESOLVED, that the following individuals are hereby elected to serve in the offices of the Corporation set forth opposite their names until their successors are duly elected and qualified, or their earlier death, resignation or removal:

President: Kyle Higgins  
Treasurer: Kyle Higgins  
Secretary: Kyle Higgins

### Corporate Records and Minute Book

RESOLVED, that the officers of the Corporation are hereby authorized and directed to procure all corporate books, books of account and stock books that may be required by the laws of Massachusetts or of any foreign jurisdiction in which the Corporation may do business or which may be necessary or appropriate in connection with the business of the Corporation.

RESOLVED FURTHER, that the officers of the Corporation are authorized and directed to maintain a minute book containing the Articles of Organization, as filed with and certified by the office of the Massachusetts Secretary of State and as may be amended from time to time, its Bylaws and any amendments thereto, and the minutes of any and all meetings and actions of the Board, Board committees and the Corporation's shareholders, together with such other documents, including this Written Consent, as the Corporation, the Board or the Corporation's shareholders shall from time to time direct and to ensure that an up to date copy is also kept at the principal executive office of the Corporation (as designated below).

### Share Certificates

RESOLVED, that the form of share certificate attached hereto has been presented to the Board for review and is hereby approved and adopted as the form share certificate of the Corporation and the Secretary of the Corporation is directed to insert such form share certificate in the minute book of the Corporation.

### Ratification of Actions by Incorporator

RESOLVED, that the Action by Written Consent of the Sole Incorporator dated May 11, 2018 and all actions taken by the Corporation's sole incorporator, LegalZoom.com, Inc. and its agents, in connection with the formation of the Corporation are hereby in all respects approved, ratified and affirmed for and on behalf of the Corporation.

### Annual Accounting Period

RESOLVED, that until otherwise determined by the Board the fiscal year of the Corporation shall end on January 31.

### Principal Executive Office

RESOLVED, that the principal executive office of the Corporation shall initially be located at 60 Franklin St., Winchendon, Massachusetts 01475.

### Bank Accounts

RESOLVED, that the officers of the Corporation are hereby authorized and directed to establish, maintain and close one or more accounts in the name of the Corporation for the funds of the Corporation with any federally insured bank or similar depository; to cause to be deposited, from time to time, in such accounts, such funds of the Corporation as such officer deems necessary or advisable, and to designate, change or revoke the designation, from time to time, of the officer or officers or agent or agents of the Corporation authorized to make such deposits and to sign or countersign checks, drafts or other orders for the payment of money issued in the name of the Corporation against any funds deposited in any of such accounts; and to make such rules and regulations with respect to such accounts as such officers may deem necessary or advisable, and to complete, execute and deliver any documents as banks and similar financial institutions customarily require to establish any such account and to exercise the authority granted by this resolution including, but not limited to, customary signature card forms and form banking resolutions.

RESOLVED FURTHER, that all form resolutions required by any such depository, if any, are adopted in such form used by such depository by this Board, and that the Secretary is authorized to certify such resolutions as having been adopted by the Board and directed to insert a copy of any such form resolutions in the minute book of the Corporation.

RESOLVED FURTHER, that any such depository to which a certified copy of these resolutions has been delivered by the Secretary of the Corporation is entitled to rely upon such resolutions for all purposes until it shall have received written notice of the revocation or amendment of these resolutions, as adopted by the Board.

### Qualification to do Business

RESOLVED, that the officers of the Corporation are hereby authorized and directed for and on behalf of the Corporation to take such action as they may deem necessary or advisable to effect the qualification of the Corporation to do business as a foreign corporation in each state that the officers may determine to be necessary or appropriate, or to withdraw from or terminate the Corporation's qualification to do business in any such state.

RESOLVED FURTHER, that any resolutions which in connection with the foregoing shall be certified by the Secretary of the Corporation as having been adopted by the Board pursuant to this Written Consent shall be deemed adopted pursuant to this Written Consent with the same force and effect as if presented to the Board and adopted thereby on the date of this Written Consent, and shall be included in the minute book of the Corporation.

Payment of Expenses

RESOLVED, that the officers of the Corporation are hereby authorized and directed to pay all expenses of the incorporation and organization of the Corporation, including reimbursing any person for such person's verifiable expenses therefor.

Agent for Service of Process in Massachusetts

RESOLVED, that Kyle Higgins shall be appointed the Corporation's agent for service of process in Massachusetts.

Authorization of Further Actions

RESOLVED, that the officers of the Corporation are, and each of them hereby is, authorized, empowered and directed, for and on behalf of the Corporation, to execute all documents and to take all further actions they may deem necessary, appropriate or advisable to effect the purposes of each of the foregoing resolutions.

RESOLVED, that any and all actions taken by any officer of the Corporation in connection with the matters contemplated by the foregoing resolutions are hereby approved, ratified and confirmed in all respects as fully as if such actions had been presented to the Board for approval prior to such actions being taken.

**EXHIBIT A**  
**BYLAWS OF**  
Jolly Green, Inc.

## BYLAWS

### OF

### Jolly Green, Inc., a Massachusetts Corporation

#### ARTICLE I

Section 1.1. Annual Meetings. An annual meeting of the shareholders of Jolly Green, Inc. (the "Corporation") will be held for the election of directors on a date and at a time and place either within or without the commonwealth of Massachusetts fixed by resolution of the Board of Directors and within six months after the end of the fiscal year.

Any other proper business may be transacted at the annual meeting, except as limited by any notice or other requirements under the Massachusetts Business Corporation Act.

Section 1.2. Special Meetings. Special meetings of the shareholders may be called at any time by the holders of shares entitled to cast not less than 10% of the votes at the meeting, such meeting to be held on a date and at a time and place either within or without the Commonwealth of Massachusetts as may be stated in the notice of the meeting.

Section 1.3. Notice of Meetings. Whenever shareholders are required or permitted to take any action at a meeting a written notice of the meeting must be given not less than ten (10) nor more than sixty (60) days before the date of the meeting to each shareholder entitled to vote thereat, except that meetings to increase the number of shares or corporate indebtedness each require at least 60 days' notice.

Notice of a shareholders' meeting or any report must be given either personally or by first-class mail or other means of written communication, addressed to the shareholder at the address of such shareholder appearing on the books of the Corporation or given by the shareholder to the Corporation for the purpose of notice. The notice shall be deemed to have been given at the time when delivered personally or deposited in the mail or sent by other means of written communication.

Section 1.4. Adjournments. When a shareholders' meeting is adjourned to another time or place, except as otherwise provided in this Section, notice need not be given of any such adjourned meeting if the date, time and place thereof are announced at the meeting at which the adjournment is taken. At the adjourned meeting the Corporation may transact any business which might have been transacted at the original meeting. If the adjournment is for more than 45 days or if after the adjournment a new record date is fixed for the adjourned meeting, a notice of the adjourned meeting shall be given to each shareholder of record entitled to vote at the meeting.

Section 1.5. Validating Meeting of Shareholders; Waiver of Notice. The transactions of any meeting of shareholders, however called and noticed, and wherever held, are as valid as though had at a meeting duly held after regular call and notice, if a quorum is present either in person or by proxy, and if, either before or after the meeting, each of the persons entitled to vote, not present in person or by proxy, signs a written waiver of notice or a consent to the holding of the meeting or an approval of the minutes thereof. All such waivers, consents and approvals shall be filed with the corporate records or made a part of the minutes of the meeting. Attendance of a person at a meeting shall constitute a waiver of notice of and presence at such meeting, except when the person objects, at the beginning of the meeting, to the transaction of any business because the meeting is not lawfully called or convened and except that attendance at a meeting is not a waiver of any right to object to the consideration of matters required by law to be included in the notice but not so included, if such objection is expressly made at the meeting. Neither the business to be transacted at nor the purpose of any regular or special meeting of shareholders need be specified in any written waiver of notice, consent to the holding of the meeting or approval of the minutes thereof, except as required by the Massachusetts Business Corporation Act.

Section 1.6. Quorum. A majority of the shares entitled to vote, represented in person or by proxy, shall constitute a quorum at a meeting of the shareholders.

The shareholders present at a duly called or held meeting at which a quorum is present may continue to transact business until adjournment notwithstanding the withdrawal of enough shareholders to leave less than a quorum, if any action taken (other than adjournment) is approved by at least a majority of the shares required to constitute a quorum. In the absence of a quorum, any meeting of shareholders may be adjourned from time to time by the vote of a majority of the shares represented either in person or by proxy, but no other business may be transacted, except as provided in this Section.

Section 1.7. Organization. Meetings of shareholders shall be presided over by the Chairman of the Board of Directors, if any, or in the absence of the Chairman of the Board of Directors by the Vice Chairman of the Board of Directors, if any, or in the absence of the Vice Chairman of the Board of Directors by the President, or in the absence of the foregoing persons by a chairman designated by the Board of Directors, or in the absence of such designation by a chairman chosen at the meeting. The Secretary, or in the absence of the Secretary, an Assistant Secretary, shall act as secretary of the meeting, or in their absence the chairman of the meeting may appoint any person to act as secretary of the meeting.

Section 1.8. Voting. Unless otherwise provided in the Articles of Organization, each outstanding share, regardless of class, shall be entitled to one vote on each matter submitted to a vote of shareholders.

Any holder of shares entitled to vote on any matter may vote part of the shares in favor of the proposal and refrain from voting the remaining shares or vote them against the proposal, other than elections to office, but, if the shareholder fails to specify the number of shares such shareholder is voting affirmatively, it will be conclusively presumed that the shareholder's approving vote is with respect to all shares such shareholder is entitled to vote.

Directors shall be elected by a plurality of the votes of the shares present in person or represented by proxy at the meeting and entitled to vote on the election of directors.

In all other matters, unless otherwise provided by Massachusetts law or by the Articles of Organization or these bylaws, the affirmative vote of the holders of a majority of the shares entitled to vote on the subject matter at a meeting in which a quorum is present shall be the act of the shareholders. Where a separate vote by class or classes is required, the affirmative vote of the holders of a majority of the shares of such class or classes at a meeting in which a quorum is present shall be the act of such class or classes, except as otherwise provided by the state of Massachusetts law or by the Articles of Organization or these bylaws.

Section 1.9. Shareholder's Proxies. At all meetings of shareholders, a shareholder may vote by proxy executed in writing by the shareholder or by his or her duly authorized attorney-in-fact.

Such proxy shall be filed with the Secretary of the Corporation before or at the time of the meeting. No proxy shall be valid after the expiration of 11 months from the date thereof unless otherwise provided in the proxy. Every proxy continues in full force and effect until revoked by the person executing it prior to the vote pursuant thereto, except as otherwise provided in this Section. Such revocation may be effected by a writing delivered to the Corporation stating that the proxy is revoked or by a subsequent proxy executed by the person executing the prior proxy and presented to the meeting, or as to any meeting by attendance at such meeting and voting in person by the person executing the proxy.

Section 1.10. **Inspectors.** In advance of any meeting of shareholders the Board of Directors may appoint inspectors of election to act at the meeting and any adjournment thereof.

Section 1.11. **Fixing Date for Determination of Shareholders of Record.** In order that the Corporation may determine the shareholders entitled to notice of any meeting or to vote or to express consent to corporate action in writing without a meeting or entitled to receive payment of any dividend or other distribution or allotment of any rights or entitled to exercise any rights in respect of any other lawful action, the Board of Directors may fix, in advance, a record date, which shall not be more than 60 nor less than ten days prior to the date of such meeting nor more than 60 days prior to any other action.

If no record date is fixed:

- a) the record date for determining shareholders entitled to notice of or to vote at a meeting of shareholders shall be at the close of business on the business day next preceding the day on which notice is given or, if notice is waived, at the close of business on the business day next preceding the day on which the meeting is held;
- b) the record date for determining shareholders entitled to give consent to corporate action in writing without a meeting, when no prior action by the Board of Directors has been taken, shall be the day on which the first written consent is given; and
- c) the record date for determining shareholders for any other purpose shall be at the close of business on the day on which the Board of Directors adopts the resolution relating thereto or the 60th day prior to the date of such other action, whichever is later. When a determination of shareholders entitled to vote at any meeting of shareholders has been made as provided in this Section, such determination shall apply to any adjournment thereof.

## Plan to Obtain Liability Insurance

Jolly Green has acquired and obtained liability and product insurance since 2/25/19. Our policy number is HBD10037837 and is through Hudson Specialty Insurance Company. The limits are followed, \$1 million per occurrence, \$ 2 million in aggregate annually, deductible is \$1000.00 per occurrence. Product liability \$1 million.

Jolly Green plans to review the insurance plan annually and adjust as required by the Cannabis Control Commission. Attached is a Certificate of Liability Insurance and the certificate holder is the Cannabis Control Commission.



CONFIDENTIAL

# Jolly Green Inc.

EIN ID number 82-5286266

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## Cultivation Business Plan

Prepared May 2018

### **Contact Information**

Kyle Higgins

Principle

[higginsmechanical@comcast.net](mailto:higginsmechanical@comcast.net)

978-502-3740

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# 1 EXECUTIVE SUMMARY

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## 1.1 COMPANY PURPOSE

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Jolly Green is a new company in the Massachusetts recreational marijuana industry dedicated to cultivating cannabis. JG will work hard to become a leading producer in the cannabis industry.

JG's goal is to provide high-quality cannabis to all licensed marijuana establishments and processing facilities in Worcester and the surrounding areas.

## 1.2 COMPANY ORGANIZATION

---

JG is a limited liability company formed in 2018 by Kyle Higgins.

### Services

JG will cultivate high-quality cannabis and cannabis plants. The company will distribute cannabis through wholesale transactions to qualified marijuana retail stores and other licensed facilities. We are a company whose ethos is creating high quality and safe cannabis. All of the marijuana products we distribute must first pass internal inspections and state-required inspections by licensed marijuana testing facilities before being provided to our end users.

## 1.3 THE MARKET

---

Recent research indicates that the cannabis industry has been growing steadily and rapidly since the passage of laws allowing the distribution of marijuana. According to Oakland-based marijuana angel investment network The ArcView Group (*Executive Summary, 4th Edition*),

national legal sales for 2015 grew to \$5.7 billion from \$4.6 billion in 2014, fueled by explosive growth in adult use market sales, which grew from \$373.8 million in 2014 to \$1.2 billion by the end of 2015, an increase of 232%.

Demand is expected to remain strong in 2016 with legal markets projected to grow to \$7.4 billion, a 29% increase over 2015. By 2020, legal market sales will grow to \$20.6 billion, with adult use sales comprising nearly two-thirds of the total market.

Twenty-eight states already permit medical cannabis use, and eight states and the District of Columbia allow full adult use. With nearly a dozen states debating changes to their cannabis laws in the coming

year, 2016 is the tipping point in which a majority of U.S. states transition from cannabis prohibition to some form of regulated legal markets.

According to the recent study made by ArcView, the legalization and regulation of adult use in Colorado and Washington have been a success. Many of the negative outcomes threatened by prohibitionists have not borne out. Crime is down, falling prices have made the legal market increasingly competitive against the black market, regulatory compliance is high as business dare not risk losing their valuable licenses, and product quality and diversity has increased. The success of these markets has provided the first clear evidence that legalization is a viable alternative to prohibition.

A recent report from the Department of Revenue in Colorado had shattering sales records this year, maintaining a wide margin over monthly sales in 2015. According to an update from Arcview, the state is on track to break \$1billion in sales in 2016 with total legal sales projected to break \$2 billion by 2020.

Washington is projected to have the second largest adult use market in the US. It is forecasted to grow from \$1.1 billion in 2016 to \$2 billion by 2020. With a 37% cannabis retail sales tax, the state's growth represents a significant revenue opportunity for the state.

According to a preliminary estimate by the Alaska Department of Revenue, the state stands to make between \$5.1 million and \$19.2 million in tax revenue from commercial marijuana this year.

California's medical sales already account for a large chunk of the total industry; as it legalizes recreational marijuana last November, as many expect, that alone could lead to a huge boom in industry sales.

In November 2016, voters legalized adult use of marijuana in Massachusetts, according to ArcView, the recreational cannabis market would top \$300 million in 2018, likely to be the first full year the business would be legal. Revenues would then nearly triple to more than \$900 million in 2020, which combined with the expected continued growth of medical marijuana sales would put the state's total marijuana market at \$1.17 billion.

It's clear by reviewing the revenue and market value figures that marijuana industry is poised for continued growth. The changing legal environment combined with changing public attitudes are all factors contributing to a perfect storm to cultivate industry growth.

With these figures and projections, it is easy to understand why observers are confident that legalizing, regulating, and taxing marijuana will generate plenty of revenue while creating jobs and better prioritizing law enforcement resources. As more state regulations continue to mature and evolve toward full legalization and acceptance of cannabis as a product with commercial value, demand is expected to increase in all segments of the industry. Production and distribution are positioned for exponential growth as new technologies and methods evolve and become more efficient and new, innovative product categories are born from these advancements.

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### 1.4 THE OPPORTUNITY

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The opportunities for businesses and investors are accelerating as marijuana legislation progresses across the nation. Business practices amongst the various different industries affected by new marijuana legislation are quickly professionalizing, adapting to new state regulations, and employing increasingly sophisticated business models to increase scales and access new markets. Marijuana is proving to be the next great American industry.

In Massachusetts, potential business owners will be able to establish retail stores, cultivation centers, processing and testing facilities. Those in the agricultural sector can expand into cultivating marijuana for retail stores and other marijuana businesses. Those in the chemical and biological sciences sector, have the opportunity to become laboratory-testing facilities for marijuana-processors and producers that want their products to be lab-tested. Food professionals and other marijuana-infused goods producers are able to create a variety of products for retail stores. Through the creation and success of all these new types of business, states and municipalities are able to tap a fresh, new source of tax revenue.

With the approval of the use of recreational marijuana of adults in Massachusetts, we can expect a more robust and stable regulatory landscape that will provide ample opportunities for cutting edge and proprietary retailers like Jolly Green.

From one perspective, one may think these recent developments in Massachusetts may make that market less competitive and less attractive from an opportunity standpoint. We believe these developments indicate that the Massachusetts market is a more attractive opportunity for those seeking to enter the state's recreational marijuana industry. Massachusetts has significant barriers to entry because of its licensing standards and process and, therefore, only those who have the profile and resources to satisfy those licensing standards have an opportunity to enter the Massachusetts market.

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### 1.5 FINANCIAL SUMMARY

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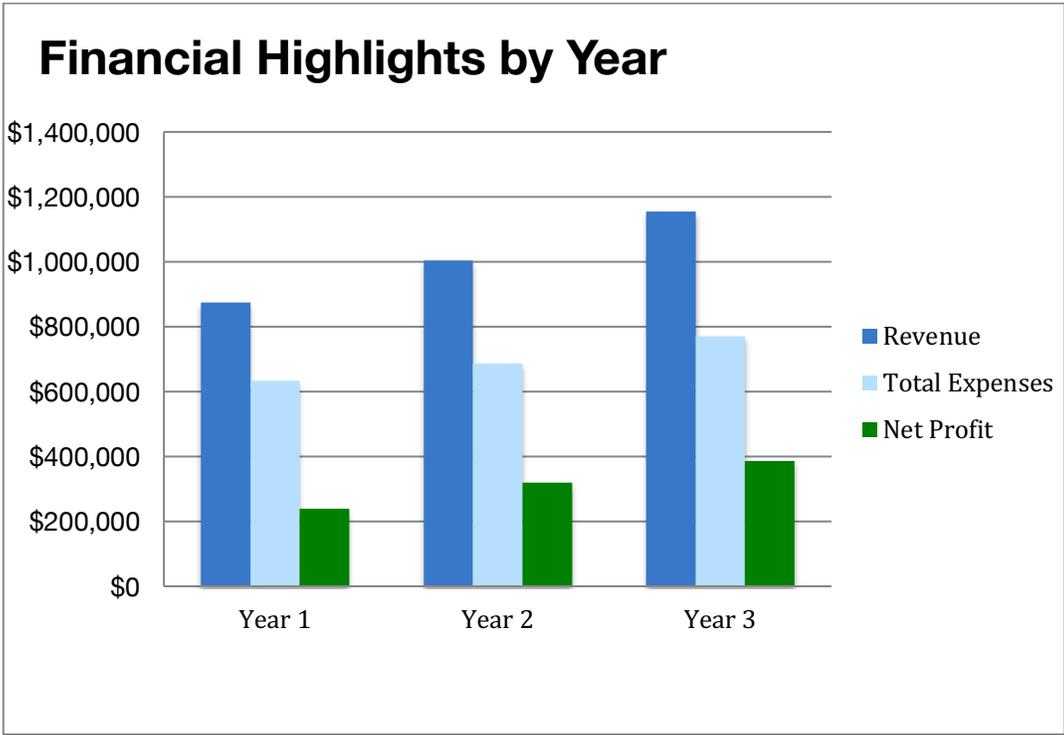
Jolly Green will fund its startup costs largely through a loan from Higgins Mechanical INC and personal savings.

Sales are expected to start conservatively the first few months and increase steadily through the third and fourth quarters of the first year of operations.

We plan to retain cash generated from operations and utilize it to cover cash required for operations and to fund future expansion opportunities as they arise.

Our strategy also includes a persistent search identifying operational inefficiencies and adjusting. Therefore, we anticipate that following our first year of operations, that JG will be able to reduce operating expenses as a result of operational experience, and industry knowledge.

### 1.5.1 Financial Highlights by Fiscal Year



## Objectives

1. Net annual income to support full-time staff and expenses.
2. Monthly sales increasing steadily throughout FY.
3. Become profitable by the end of the first year of operations. See attached financials.

## 1.6 KEYS TO SUCCESS

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JG believes in the following keys to success:

1. Focusing on cultivating high quality grade cannabis.
2. Maintaining exemplary cultivation standards and becoming a leading supplier of cannabis.
3. Working in conjunction with the local community to foster good will and understanding the effects of marijuana.
4. Building business relationships to foster and grow business-to-business sales by meeting with retailers, processors, laboratory and marijuana industry professionals on a regular basis.

## Company Overview

Jolly Green is a new cannabis cultivation facility that will cultivate and distribute high-quality cannabis to other retail marijuana establishments and licensed facilities.

We believe in going above and beyond to cultivate the highest quality cannabis strains. Our staff will be experts on various strains, from seed to harvest, the effects of various strains, the cultivation methods

and processes we use to cultivate our cannabis. We will be knowledgeable, friendly resources to owners and agents of retail marijuana stores and processing facilities. Jolly Green is dedicated to raising the standard in product quality and leading by example in creating a higher code of ethics for businesses in the industry to follow.

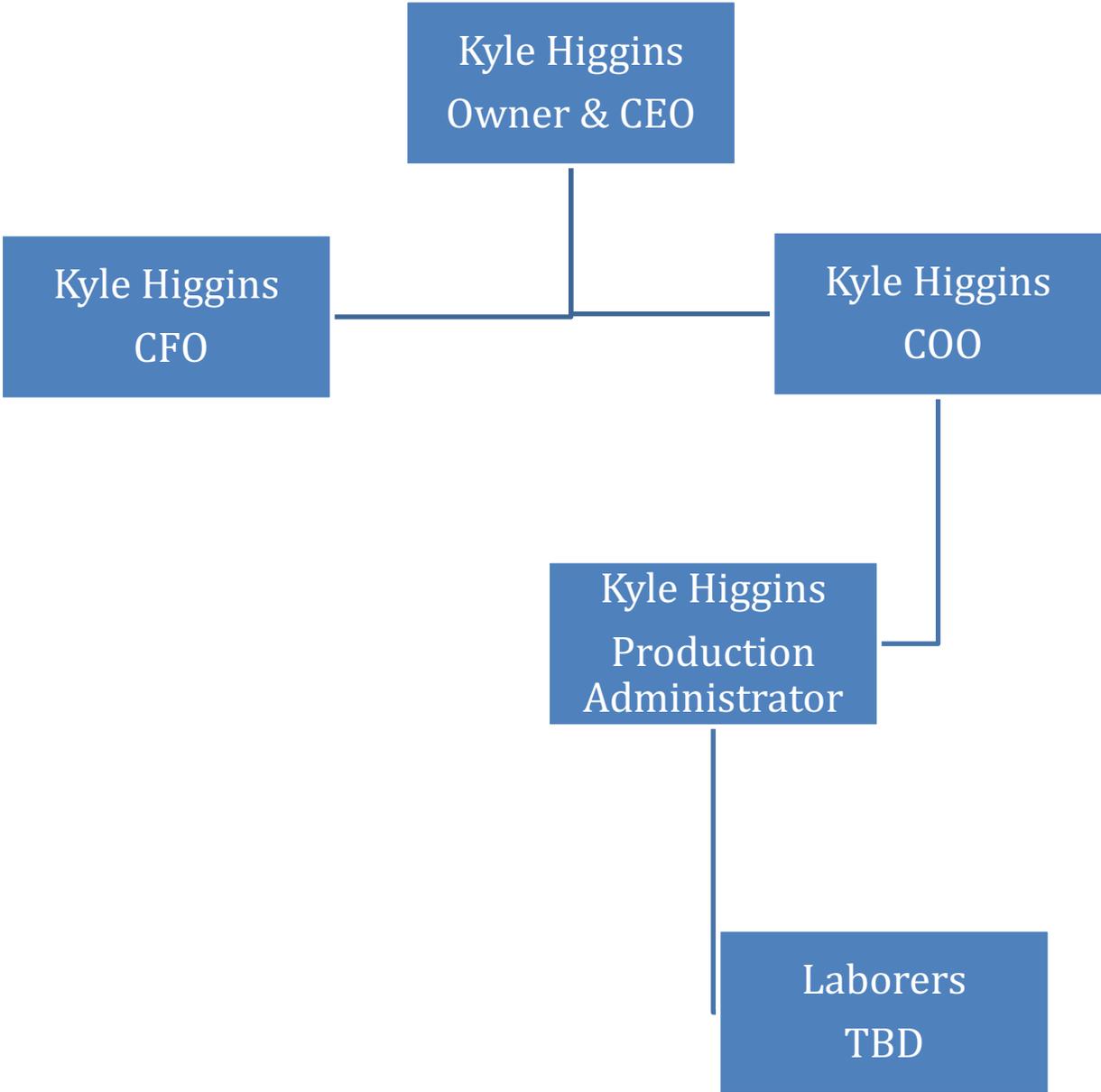
## 1.7 COMPANY HISTORY

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JG was founded in 2018 as Jolly Green by Kyle Higgins. The company was founded to serve the immediate and future needs of other resale marijuana establishments in Worcester Massachusetts. JG's founders bring their own unique experiences, education and dedication to combine small business hospitality with big business efficiency and professionalism to create a company that serves many needs and purposes.

We founded and modeled our company on the desire to help customer access safe, consistent and high-quality cannabis.

1.8 ORGANIZATIONAL CHART



## 1.9 MANAGEMENT TEAM

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Our management team and founders bring together a unique and diverse background of education, experience and expertise.

### **Kyle Higgins Chief Executive Officer**

*Kyle has over 18 years' experience working as President & CEO of Higgins Mechanical, Inc. In his position, he did everything from staff development to fundraising. He was responsible for revenue from \$1 million to \$2million. He has contributed to community development in many ways.*

### **Kyle Higgins Chief of Operations & Production**

Jolly Green

*Kyle is an advocate of taxing and regulating the use and sale of marijuana and was one of the main financial backers of the recent, partially successful, campaign to legalize the use of marijuana in the United States.*

### **Kyle Higgins Operations & Production Administrator**

*Kyle has been in charge of the day-to-day operations of Higgins mechanical for the past 18 years, including marketing, new employee development, accounting/ bookkeeping, overseeing payroll, Human Resources as well as handling all city, state, and county licensing issues.*

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## 1.10 STAFFING PLAN

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We recognize that human resources are an extremely important asset. Hence, we will screen new applicants very carefully including in-person interviews, detailed nationwide and statewide criminal history screenings and reference checks. We will review each employee's performance regularly, and when possible, promote from within. Our salaries and benefit packages will be competitive with those offered by similar firms operating in our area.

With the steady and continued decline in available jobs due to outsourcing and automation, our plan is to not only supply local citizens with positions, but enable them to have successful, fulfilling and long-lasting careers while showing the community that we can take their sons and daughters and mold them into career professionals in the expanding recreational marijuana industry.

Using the founders' extensive knowledge and history of working with educational and professional organizations, the company will provide a rich environment of education that will not only benefit the employees, but also our customers and the local community as we learn and develop the future together.

## 1.11 LOCATIONS AND FACILITIES

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### 1.11.1 PROPOSED ADDRESS

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JG will be located at 60 Franklin St Winchendon Ma 01475.

60 Franklin St. is owned by Higgins Mechanical 246 Suffolk Lane Gardner Ma.

Higgins Mechanical of Gardner Ma has granted HM permission to operate a cultivation facility at the proposed address above.

#### **Square Footage**

The proposed address is approximately 3000 square feet; an adequate size for the proposed cultivation facility.

#### **Facilities**

The operation will utilize:

- Locked, secure, enclosed growing areas.
- Irrigation, fertilization, temperature control and water treatment devices.
- Distinct areas for the curing, packaging, storage, and disposal of cannabis.
- Business administration offices.

## **Alarm & Security System**

Simply Safe will implement an alarm and security system that is fully compliant with state laws and regulations. We are planning to have a safe, secure venue with the following measures:

- All external doors and gates will be secured by commercial locks rated to ANSI grade 1 or similar standards.
- Will have a secure area to store all usable marijuana, harvested plants, and finished products when the business is not operating. All entries will be secured with a steel door in a steel frame or the equivalent and will use commercial locks.
- An alarm system programmed to activate upon unauthorized breach of any door, window, or other point of entry;
- Security cameras and monitors with off-site backups;
- Video surveillance cameras.

We will continuously monitor state, city and county regulations to ensure we remain compliant with all security and alarm requirements.

## **Proposed Hours of Operation**

JG will be operational according to the following proposed hours of operation:

- Monday: 7:00 a.m. - 8:00 p.m.
- Tuesday: 7:00 a.m. - 8:00 p.m.
- Wednesday: 7:00 a.m. - 8:00 p.m.
- Thursday: 7:00 a.m. - 8:00 p.m.
- Friday: 7:00 a.m. - 8:00 p.m.
- Saturday: 7:00 a.m. - 8:00 p.m.
- Sunday: 7:00 a.m. - 8:00 p.m.

# Products and Services

## 1.12 SERVICES

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Jolly Green is a new company that believes combining small family business hospitality with big business efficiency that allows JW to provide a variety of cannabis strains to licensed marijuana facilities and retail stores in a clean, safe and welcoming environment.

We offer the following services:

1. Cultivation of cannabis in a clean, safe, and compliant environment.
2. Distribution of cannabis to retail marijuana establishments and licensed facilities.
3. Ensuring all cannabis that will be distributed meets regulatory requirements and has passed any and all required laboratory testing.
4. Education of qualified marijuana establishments and processing facilities owners and agents to help them better understand the various strains and their effects.
5. Serve as an informational resource about cannabis cultivation, agriculture and horticulture.
6. Be an informational portal about the marijuana industry to customers and the community.

## 1.13 PRODUCTS

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JG will cultivate and provide a range of cannabis strains. The decision to cultivate cannabis instead of enter the other segments of the industry was made for two reasons. First, we have an abundance of cultivation, agriculture, and horticulture amongst our staff and founders, so this is an inherent advantage we currently possess. Second, the market for raw and processed marijuana will never go away, ensuring excellent

growth and constant demand for cannabis in all forms for decades to come as new products are created based on raw cannabis.

JG will offer varieties of the following excellent strains:

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### 1.13.1 CANNABIS INDICA

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Indica dominant strains are higher in Cannabidiol (CBD). Indica originally come from the countries of the world like Afghanistan, Morocco, and Tibet. The buds will be thick and dense, with flavors and aromas ranging from pungent skunk to sweet and fruity. Indica strains relax muscle and work as general analgesics, also helping with sleep.

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### 1.13.2 CANNABIS SATIVA

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Sativa dominant strains are higher in the THC cannabinoid. They originally come from Colombia, Mexico, Thailand and Southeast Asia. Flavors range from earthy to sweet and fruity. Sativa strains produce more of a euphoric high, lifting the consumer’s mood and therapeutically relieving stress.

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### 1.13.3 INDICA - SATIVA HYBRIDS

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Hybrids will vary in their composition of THC, CBD and other cannabinoids, and are often referred to based upon the dominant cannabinoid ratio inherited from their lineage; indica, mostly indica, indica/sativa, mostly sativa, or pure sativa. The resulting hybrid strains will grow, mature and smoke in relationship to the Indica-sativa percentages they end up containing.

#### **Current Products**

JG will cultivate and distribute high quality cannabis to retail marijuana establishments and processing facilities.

#### **Future Products**

JG will listen to owners and agents of marijuana retail stores and processing facilities to understand what other needs are not being met. Those needs could include an expansion of different types of cannabis cultivation. All future products must and will adhere to state as well as city and county laws and regulations.

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## 1.14 SOURCING AND FULFILLMENT

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#### **Acquisition**

JG will acquire all seeds, seedlings, clones, or mature plants in accordance with the state laws and regulations.

## **Dispensing**

We will distribute to licensed marijuana facilities and retail stores per the legal limits as described in state laws and regulations. Sales will be tracked via our robust, industry-leading, seed-to-sale inventory management and tracking system.

## **Oversight**

An Inventory Control System will document all cannabis, cannabis seeds, seedlings, clones or mature plants received, distributed and sold, destroyed or in-process with independent testing laboratories. The amount, type, date and batch number will be documented in accordance with the state laws and regulations. As we store and distribute cannabis, each move in the supply chain will be detailed and documented in the Inventory Control System. Access to this system will be limited to authorized agents and department/government officials.

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### 1.15 COMPETITORS

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Based upon the fact that there are currently no firms operating in this market, there are no competitors providing comparable products or services at this time.

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### 1.16 TECHNOLOGY

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The agricultural team will implement current, state-of-the-art agricultural techniques for cultivating and harvesting cannabis.

Programmable Logic control systems will be used to automate the farming process.

The management team will maintain Windows and Mac capabilities including:

1. Complete email facilities on the Internet for working with customers directly through email and website delivery of information.
2. Complete desktop publishing facilities for delivery of reports, announcements, news, and information.
3. A robust point-of-sales system to process payments.

4. Inventory control is with METRC system which will be in compliance with the requirements described in state laws and regulations.

### **Inventory Control System**

JG will implement an inventory control system with METRC to track all cannabis through its entire grow cycle and through all chains of custody. The inventory control system will also track the following:

- Each day's beginning inventory;
- Acquisitions, sales, disbursements, and disposable/disposed unusable marijuana throughout the day;
- Each day's ending inventory.

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## **2 MARKET ANALYSIS**

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### **2.1 CURRENT MARKET ANALYSIS**

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There are currently no operating retail marijuana stores in Massachusetts. The number of marijuana establishments that will be licensed will depend on the state regulations and legislations.

Massachusetts is a densely populated New England state and also a popular tourist destination. Those two factors mean that the potential for the recreational marijuana market to explode is favorable. Although, the market is expected to start off slow since it is something entirely new, but once the market is in full swing, expect the retail stores to be busy with customers - and profits.

The market value of Massachusetts marijuana industry is based on the preliminary estimates made by Arcview. According to them, Massachusetts could become home to a \$1.1 billion cannabis industry by 2020.

### **Market Segmentation**

The marijuana market in Massachusetts is comprised of the following types of establishments:

- Retail Marijuana Stores
- Marijuana Cultivation Facilities
- Marijuana Product Manufacturing Facilities
- Marijuana Testing Facilities
- Independent accessory shops
- Other interested parties

## Current Market Analysis

Currently, 28 states and the District of Columbia have some form of marijuana legalization according to ProCon.org.

ArcView recently reported the national projection for legal cannabis sales is \$7.4 billion in 2016 and projected to rise to an estimated \$20.6 billion by 2020 (compound annual growth rate of 29%)

## Market Size: Various Model Comparisons

Tobacco and alcohol annually generate over \$17 billion in federal tax revenue. States tax tobacco and alcohol and benefit as well. Given the current economic environment and the deficits states are facing, it is understandable why legalization is a topic of discussion. Assuming comparable taxes to tobacco of 40-50% (excise and sales tax), a \$40 billion marijuana market would yield \$16-20 billion in taxes.

According to Evaluate Pharma, the pharmaceutical industry is set to grow at 6.3% per year reaching \$1.12 trillion by 2022. The 10 largest drugs companies control over one-third of this market, five are based in the United States and five in Europe. The North American market (USA & Canada) remained the world's largest market with a 48.7% share, well ahead of Europe and Japan. Companies currently spend one-third of all sales revenue on marketing their products - roughly twice what they spend on research and development. As legalization becomes a more prominent issue lawmakers are faced with, it is clear that even if the marijuana market captures a fraction of the pharmaceutical industry market share, this would mean millions or even billions of tax dollars.

## Threats and Risks

The business faces the normal risks faced by any business, the uncertainty inherent in a new business, the risks that will be common to the firms in this industry are strict regulations, most notably the City, County and States bylaws, of particular concern is the United States Government to close, fine and or cease the firms in the industry. JG will mitigate current and future regulatory risk by retaining legal counsel to

ensure the regulatory landscape is navigated meticulously and by seeking out municipalities that have historically been and will likely remain favorable for businesses like JG.

Because we are launching a new type of service, there are no guarantees of the size of the market. We believe however that, as shown in our customer needs section of this plan that there is significant demand to make this product viable. We have done significant research that confirms our belief that our offering will succeed in the marketplace.

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## 2.2 INDUSTRY FORECAST

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The state of the legal marijuana industry is continuously and rapidly changing and in the United States the legal marijuana industry is expected to grow 29% over the next year. More than ever before, it's clear that cannabis is quickly and undoubtedly becoming the next great American industry.

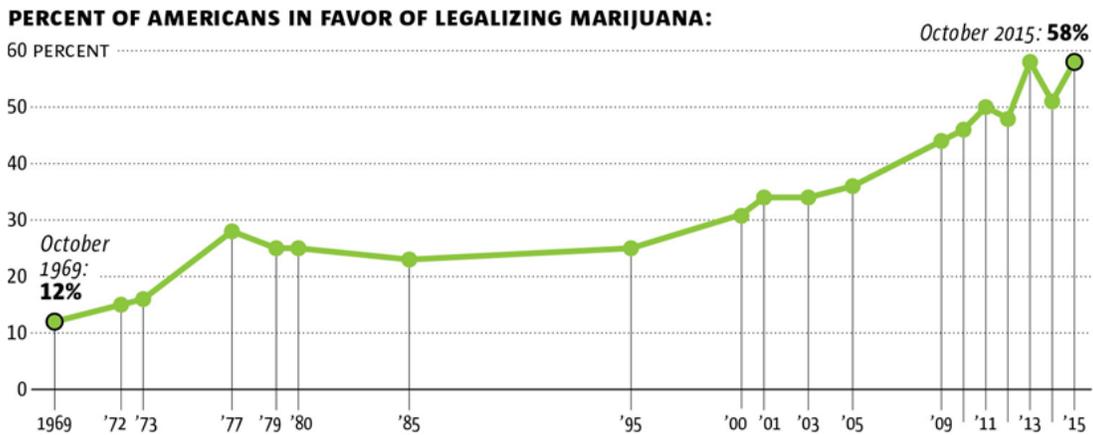
Pro Con recently reported that 28 states and the District of Columbia have legalized marijuana to some extent. The U.S. legal market value has now been projected to reach \$7.4 billion for 2016. The four-year national market potential is projected to increase by less than 300% to \$20.6 billion by 2020. (*ArcView, 4th Edition*)

The graph below depicts U.S. marijuana sales from 2015 to 2020. The data is based on the recent analyses performed by ArcView Market Research.

All of the various data and market studies available, predict significant growth and gains in the marijuana industry across the country. Current businesses are reaching profitability and many are continuing to expand. Some of the companies founded today will be among the biggest players in 2017 and beyond.

The state of the marijuana landscape is currently in flux with many states passing decriminalization laws or voting to enact marijuana laws. It is undeniable that current state policies are softening towards the recreational use of marijuana. Currently, the use of both recreational and medicinal marijuana has been entirely legalized in eight states and District of Columbia that pave the way for marijuana production, use, sale, and taxation.

America's attitude toward the decriminalization or legalization of marijuana has changed. According to Gallup, 58% now support marijuana legalization up from 36% in 2005. With each passing year, Americans are becoming more and more amenable to the reformation of public policy that would allow marijuana to be cultivated, used, sold and taxed for medical and/or recreational purposes. The recent poll below depicts the changing attitude.



Source: Gallup

The obvious public support for the reformation or creation of marijuana laws combined with state policymaker's understanding of the potential of tax revenue will continue to shape the landscape of the industry in America. As different states implement policies, it's less about whether states will legalize marijuana usage for adults but more about *when* they will legalize its usage.

## Pricing

According to Arc view, so far for 2016, the nationwide average price of a pound of wholesale cannabis has fluctuated between \$1,664 to \$2,096, regardless of cultivation method used. Indoor wholesale prices have experienced a lesser degree of fluctuation with a 23% difference between low and high average prices, compared to outdoor and greenhouse wholesale prices which have each experienced 45% price differences between low and high averages. This difference between indoor and outdoor/greenhouse wholesale prices is due in most part to the limited number of outdoor harvests per year and the timing with which these cannabis crops may be harvested.

It is worth noting that indoor, greenhouse and outdoor prices all fell to their lowest levels of the year in July 2016, raising the specter that the downward pressure on prices may continue as the early fall harvest reaches the market.



## Average Wholesale Price per Pound by Production Method

Market	Low Price/Lb.	Low Date	High Price/Lb.	High Date
U.S. Overall	\$1,664	July 29	\$2,096	May 27
Outdoor	\$1,233	July 29	\$1,798	May 27
Greenhouse	\$1,425	July 15	\$2,069	June 22
Indoor	\$1,955	July 22	\$2,408	Jan 22

Source: Arc view

In order to combat this price fluctuation, outdoor and greenhouse cultivators are reportedly staggering when they release crop harvests into the market throughout the year. This helps mitigate the effects of oversupply during and shortly after fall harvests, and helps cultivators take advantage of higher prices due to market undersupply during the summer.

In the long run, however, falling prices may eventually give outdoor and greenhouse cultivators a competitive cost advantage over indoor producers as they do not incur the significantly higher overhead costs associated with indoor cultivation, including from higher energy use.

# Strategy and Implementation

## 2.3 MARKETING PLAN

### 2.3.1 OVERVIEW

Our marketing strategy is a simple one: we will leverage our competitive edge in order to gain significant market share. Our competitive edge is our ability to consistently cultivate high-quality cannabis with consistent levels of Cannabidiol (CBD) and Tetrahydrocannabinol (THC) percentages as well as a high ratio of overall healthy plants.

#### Positioning

The marketing strategy will have the objective of raising awareness and visibility by delivering consistent, high-quality cannabis.

### 2.3.2 PRICING

The marijuana industry, like many other agricultural industries, is based on the commodity pricing that is dictated by the economic forces of supply and demand.

Since this industry is constantly changing and marijuana is an agricultural crop, making it somewhat of a commodity, the price may fluctuate depending on different locations and markets.

There are pricing indices dedicated to gathering pricing data across different locations and markets and tracking price changes over time. The US Price Index, Kind Index, MIDS Index and Schwag Index are informal indices that rely both on published marijuana prices as well as prices submitted by end users.

According to Hightimes, below are the current indices prices per ounce:

- CURRENT US PRICE INDEX: \$321
- CURRENT KIND INDEX (\$350+ PER OZ): \$377
- CURRENT MIDS INDEX (\$150-\$349 PER OZ): \$278
- CURRENT SCHWAG INDEX (\$1-\$149 PER OZ): \$116

Below are the past month indices prices per ounce:

- CURRENT US PRICE INDEX: \$330
- CURRENT KIND INDEX (\$350+ PER OZ): \$374
- CURRENT MIDS INDEX (\$150-\$349 PER OZ): \$281
- CURRENT SCHWAG INDEX (\$1-\$149 PER OZ): \$96

Below are the year-to-date indices prices per ounce:

- CURRENT US PRICE INDEX: \$312
- CURRENT KIND INDEX (\$350+ PER OZ): \$373
- CURRENT MIDS INDEX (\$150-\$349 PER OZ): \$269
- CURRENT SCHWAG INDEX (\$1-\$149 PER OZ): \$111

In order to stay competitive, Jolly Green will price our products according to variables such as the current market prices reflected in the indices and the surrounding Massachusetts market. We will continuously strive to work with producers and processors who deliver high-quality product with efficiency and economies of scale.

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### 2.3.3 PROMOTION

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We will not advertise this business outside the guidelines established by city, county and state regulations.

Since our target market will include retail stores and other licensed marijuana facilities, our marketing focus will be on building business relationships to foster and grow business-to-business sales. We will do this by visiting the various establishments and meeting those in charge of acquisitions. We will have a simple and effective website for our prospective customers to visit and learn about our company, our cultivation methods and our products. We believe an online presence is crucial in the current marketplace.

To measure the effectiveness of our marketing efforts, our management team will draft production and sales goals, which we will review on a quarterly basis.

## 2.4 MILESTONES

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Important milestones for achieving our goals this year:

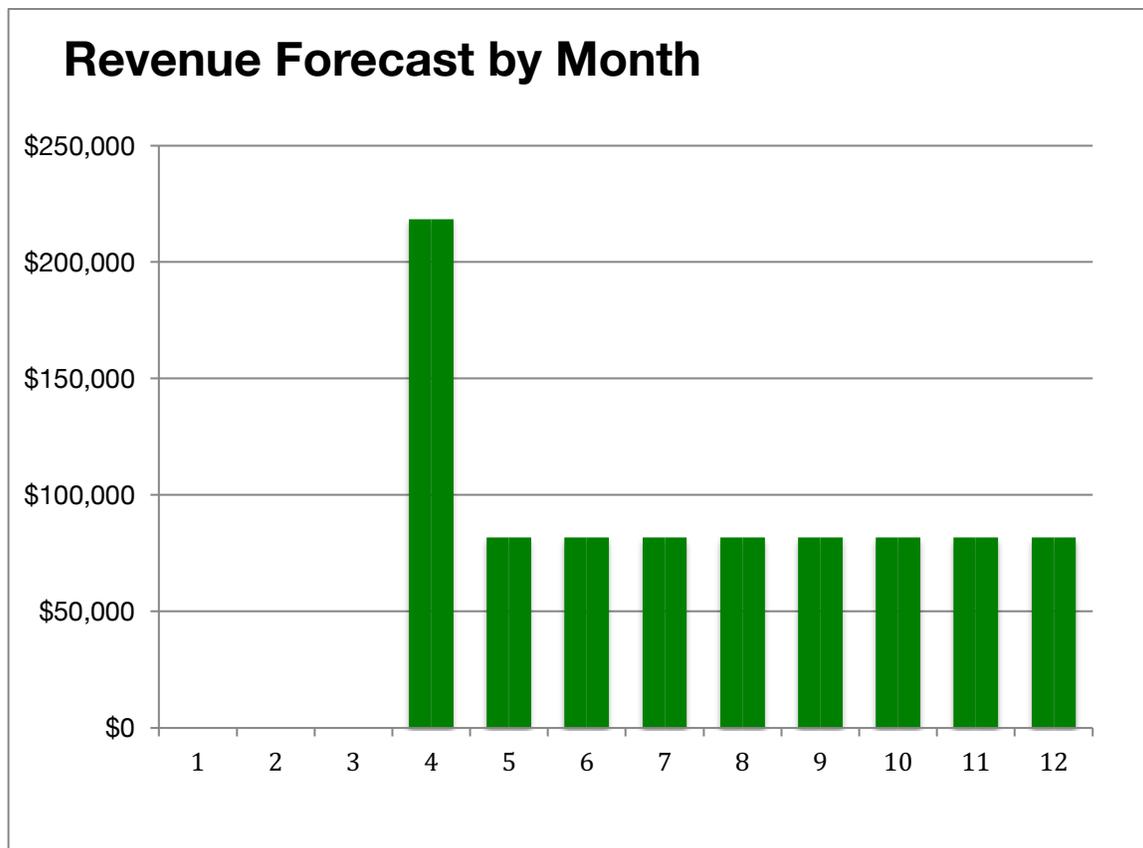
Completing Business Plan	March
Submit Business Plan, Associated Docs & Application	May
Securing a location	January
Facilities build out	June
Hire staff	August
Begin staff training	September
Complete staff training	October
Opening for business	December

## 3 FINANCIAL PLAN

### 3.1 REVENUE FORECAST

	Year 1	Year 2	Year 3
<b>Total Revenue</b>	<b>\$873,632</b>	<b>\$1,004,677</b>	<b>\$1,155,378</b>
Total Direct Cost	\$59,911	\$68,898	\$79,232
Gross Margin	\$813,721	\$935,779	\$1,076,146
<b>Gross Margin %</b>	<b>93%</b>	<b>93%</b>	<b>93%</b>

#### 3.1.1 REVENUE FORECAST BY MONTH



### 3.2 PERSONNEL PLAN

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#### 3.2.1 PERSONNEL TABLE

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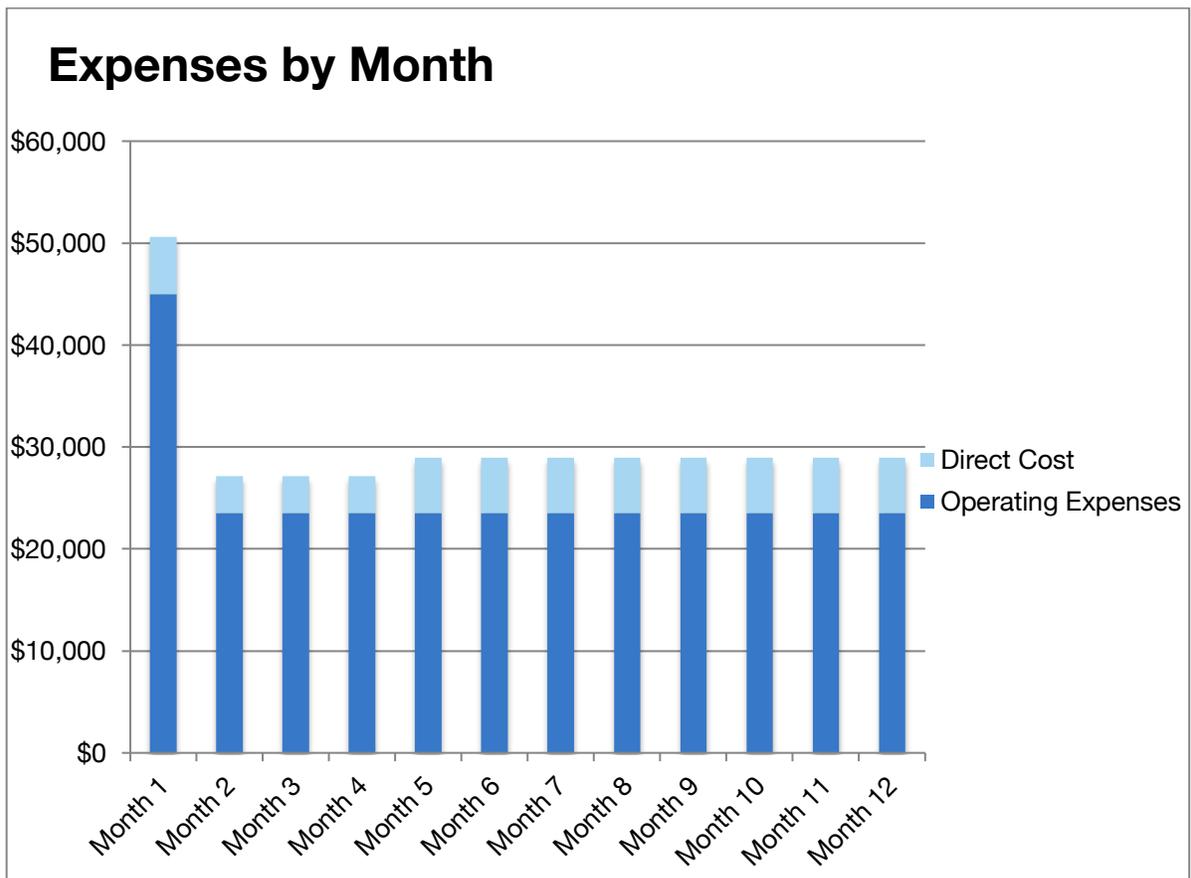
<b>Personnel</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>
Operations & Production Administrator	\$70,000	\$72,100	\$74,263
Laborers	\$84,480	\$87,014	\$89,625
<b>Total</b>	<b>\$154,480</b>	<b>\$159,114</b>	<b>\$163,888</b>

### 3.3 BUDGET

#### 3.3.1 BUDGET TABLE

	Year 1	Year 2	Year 3
<b>Operating Expenses</b>			
Salary	\$154,480	\$159,114	\$159,114
Employee Related Expenses	\$46,444	\$53,296	\$61,290
Marketing & Promotions	\$7,000	\$6,900	\$7,935
Rent	\$0	\$0	\$0
Office Supplies	\$1,000	\$690	\$794
Commercial Insurance	\$9,600	\$11,040	\$12,696
Maintenance & Repairs	\$3,000	\$3,450	\$3,968
Alarm & Security Monitoring System	\$52,000	\$48,300	\$55,545
Maintenance - Cleaning	\$1,200	\$1,380	\$1,587
Inventory Control Systems & Other Software Services	\$11,800	\$12,420	\$14,283
Phone & Internet	\$2,900	\$2,760	\$3,174
Professional Services (Accountant, Attorney, Consultant, etc.)	\$16,000	\$6,900	\$7,935
Annual Licensing & Dues	\$20,000	\$21,000	\$22,050
Other Expenses	\$2,000	\$0	\$0
<b>Total</b>	<b>\$327,424</b>	<b>\$327,250</b>	<b>\$350,370</b>

### 3.3.2 EXPENSES BY MONTH



## 4 FINANCIAL STATEMENTS

### 4.1 PROFIT AND LOSS STATEMENT

	Year 1	Year 2	Year 3
<b>Revenue</b>	<b>\$873,632</b>	<b>\$1,004,677</b>	<b>\$1,155,378</b>
Direct Cost	\$59,911	\$68,898	\$79,232
<b>Gross Margin</b>	<b>\$813,721</b>	<b>\$935,779</b>	<b>\$1,076,146</b>
<b>Gross Margin %</b>	<b>93%</b>	<b>93%</b>	<b>93%</b>
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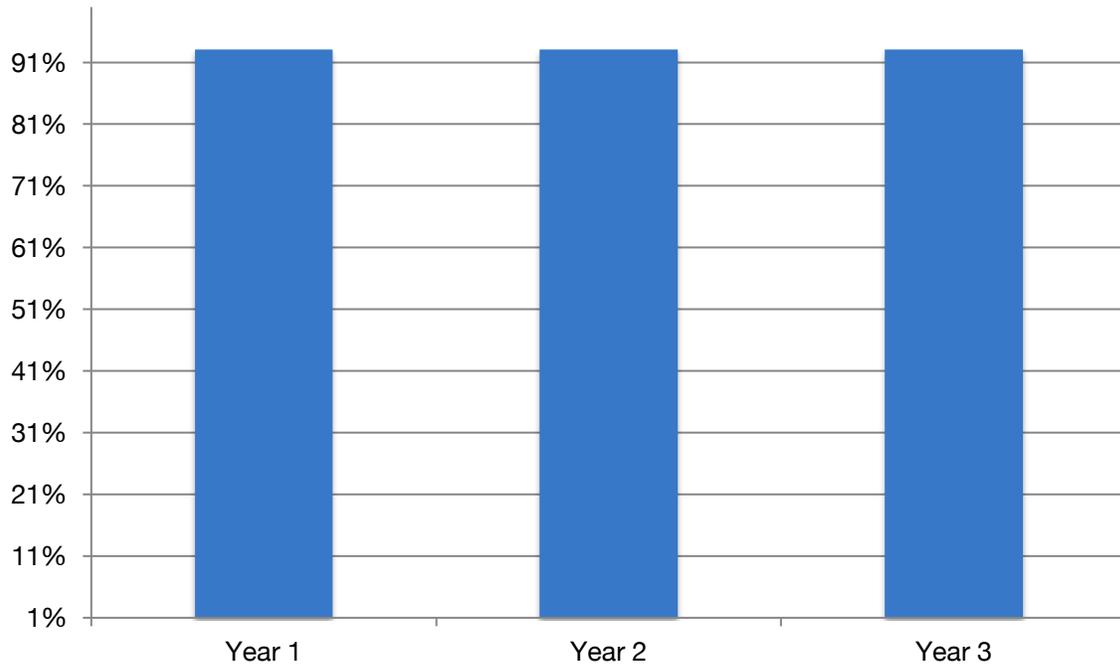
Annual Licensing & Dues	\$20,000	\$21,000	\$22,050
Other Expenses	\$2,000	\$0	\$0
Total Operating Expenses	\$327,424	\$327,250	\$350,370
<b>Operating Income</b>	<b>\$486,297</b>	<b>\$608,529</b>	<b>\$725,776</b>
Interest Incurred	\$6,190	\$4,933	\$3,618
Depreciation and Amortization	\$19,008	\$19,008	\$19,008
Income Taxes	\$210,407	\$252,488	\$302,986
Total Expenses	\$622,940	\$672,577	\$755,215
<b>Net Profit</b>	<b>\$250,692</b>	<b>\$332,100</b>	<b>\$400,164</b>
<b>Net Profit / Sales</b>	<b>29%</b>	<b>33%</b>	<b>35%</b>

---

#### 4.1.1 GROSS MARGIN BY YEAR

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## Gross Margin by Year

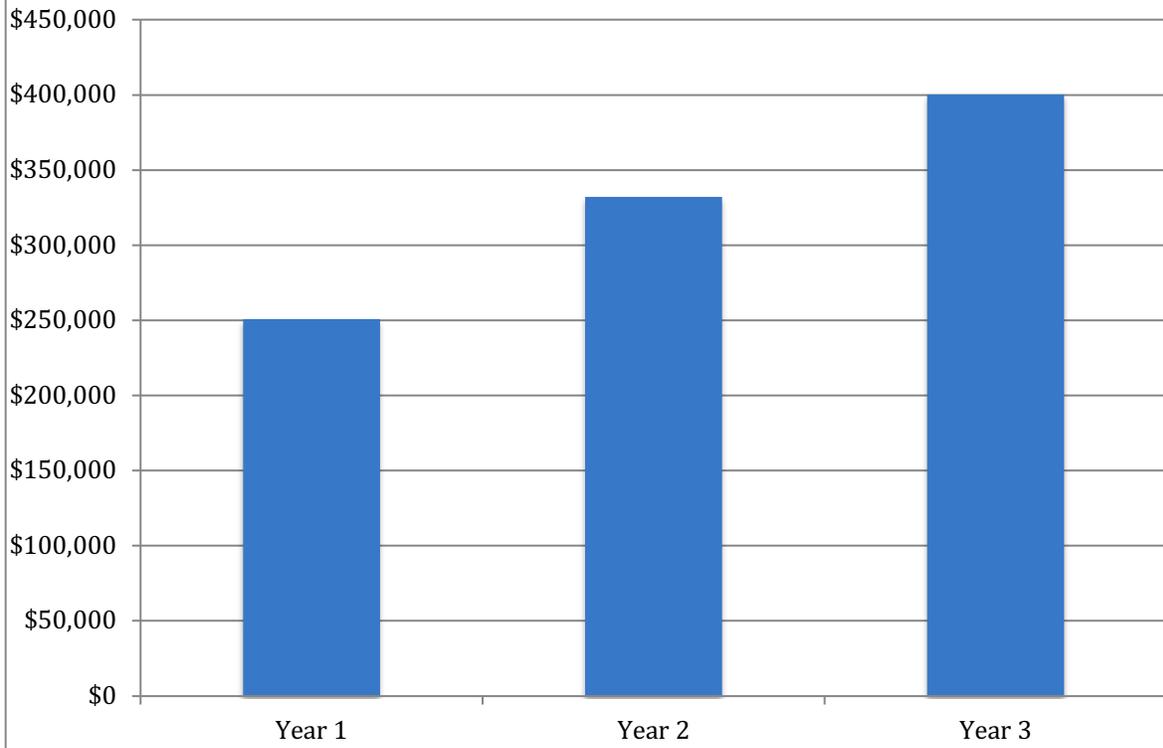


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### 4.1.2 NET PROFIT (OR LOSS) BY YEAR

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## Net Profit (Loss) by Year



## 4.2 BALANCE SHEET

As of Period's End	Starting Balances	Year 1	Year 2	Year 3
<b>Cash</b>	<b>\$32,250</b>	<b>\$227,977</b>	<b>\$544,614</b>	<b>\$923,457</b>
Accounts Receivable	\$0	\$0	\$0	\$0
Inventory	\$0	\$59,911	\$71,893	\$86,272
<b>Total Current Assets</b>	<b>\$32,250</b>	<b>\$287,888</b>	<b>\$616,507</b>	<b>\$1,009,728</b>
Long-Term Assets	\$222,750	\$222,750	\$222,750	\$222,750
Accumulated Depreciation	\$0	\$19,008	\$38,017	\$57,025
<b>Total Long-Term Assets</b>	<b>\$222,750</b>	<b>\$203,742</b>	<b>\$184,733</b>	<b>\$165,725</b>
<b>Total Assets</b>	<b>\$255,000</b>	<b>\$491,630</b>	<b>\$801,241</b>	<b>\$1,175,453</b>
Accounts Payable	\$0	\$0	\$0	\$0
Sales Taxes Payable	\$0	\$87,363	\$96,100	\$105,709
Short-Term Debt	\$0	\$0	\$0	\$0
<b>Total Current Liabilities</b>	<b>\$0</b>	<b>\$87,363</b>	<b>\$96,100</b>	<b>\$105,709</b>
Long-Term Debt	\$150,000	\$122,633	\$94,008	\$64,069
<b>Total Liabilities</b>	<b>\$150,000</b>	<b>\$209,996</b>	<b>\$190,108</b>	<b>\$169,778</b>
Paid-In Capital	\$200,000	\$200,000	\$200,000	\$250,000
Retained Earnings	-\$95,000	\$81,634	\$411,133	\$755,675
<b>Total Owner's Equity</b>	<b>\$105,000</b>	<b>\$281,634</b>	<b>\$611,133</b>	<b>\$1,005,675</b>
<b>Total Liabilities &amp; Equity</b>	<b>\$255,000</b>	<b>\$491,630</b>	<b>\$801,241</b>	<b>\$1,175,453</b>

### 4.3 CASH FLOW STATEMENT

	Year 1	Year 2	Year 3
<b>Cash Flow from Operations</b>			
Net Profit	\$250,692	\$332,100	\$400,164
Depreciation and Amortization	\$19,008	\$19,008	\$19,008
Change in Accounts Receivable	\$0	\$0	\$0
Change in Inventory	-\$59,911	-\$14,583	-\$20,000
Change in Accounts Payable	\$0	\$0	\$0
Change in Sales Taxes Payable	\$0	\$0	\$0
<b>Net Cash Flow from Operations</b>	<b>\$233,325</b>	<b>\$336,525</b>	<b>\$399,172</b>
<b>Cash Flow from Investing &amp; Financing</b>			
Assets Purchased or Sold	\$0	\$0	\$0
Investments Received	\$0	\$0	\$0
Change in Short-Term Debt	\$87,363	\$8,736	\$9,610
Change in Long-Term Debt	-\$124,961	-\$28,625	-\$29,940
<b>Net Cash Flow from Investing &amp; Financing</b>	<b>-\$37,597</b>	<b>-\$19,888</b>	<b>-\$20,330</b>
Cash at Beginning of Period	\$32,250	\$227,977	\$544,614
Net Change in Cash	\$195,727	\$316,637	\$378,842
<b>Cash at End of Period</b>	<b>\$227,977</b>	<b>\$544,614</b>	<b>\$923,457</b>



**AFFIDAVIT BY ASSURED**

Affidavit # 20 \_\_\_\_\_

I/We Jolly Green Inc of Lunenburg, MA do hereby state that in February, 2021, I/We directed IGLAND LLC FORMERLY INSURANCE CENTER OF N my/our Insurance Broker to obtain insurance against certain risks as described herein. My/Our Insurance Broker informed us that the required insurance could not be obtained from, or would not be written by, companies licensed or admitted to transact business in the Commonwealth of Massachusetts.

I/We, the Assured, was/were informed that the type and amount of insurance shown below could be obtained from certain insurers not admitted to transact business in the Commonwealth. I/We was/were further informed:

**A. The surplus lines insurer with whom the insurance was placed is not licensed in this state and is not subject to Massachusetts regulations.**

**B. In the event of the insolvency of the surplus lines insurer, losses will not be paid by the state insurance guaranty fund.**

Signature by Assured [Signature]  
Print Name Nyle Higgins  
Date: 1-21-21

**THIS PORTION MUST BE COMPLETED AND SIGNED BY THE ORIGINAL BROKER**

Name of Insured Jolly Green Inc Address 442 Howard Street  
Location of Property 60 Franklin St, Winchendon, MA 01475  
Description: \_\_\_\_\_  
Coverage: Commercial General Liability  
Limit: see application Premium \$1,000.00

I/We hereby verify that I/We explained the foregoing to the insured and it was acknowledged that he/she understood such.

License # 1942006 Signature John J. Feitelson Date 1/21/2021

A copy of this affidavit must be kept in the original broker's file and a copy must be given to the assured at the time said copy was completed by him/her.

**AFFIDAVIT BY SPECIAL BROKER**

I, Ralf H. Schaarschmidt II of East Montpelier, VT in said county of Washington depose and say that I was engaged directly by the Assured named herein or informed by the Assured's Insurance licensed Agent/Broker that after diligent efforts, he/she is unable to procure in companies admitted to do business in this Commonwealth the amount and/or type of insurance necessary to protect the insurable interests described above. This Affidavit is made to comply with the requirements of Section 168 of Chapter 175 of the General Laws, and to authorize me as a licensed special insurance broker under said section to procure insurance for said insurable interests beyond that which companies admitted to do business in the Commonwealth are willing to write thereon. The following companies or groups are among those which have accepted all or part thereof:

Company	NAIC#	Policy #	Premium
<u>Hudson Specialty Insurance Company</u>	<u>37079</u>	<u>[Redacted]</u>	<u>\$1,000.00</u>
_____	_____	_____	_____

**Amendments to Affidavit: ( ) Increase ( ) Decrease**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I hereby verify the foregoing statements and declare that they were made under the penalties of perjury.

License # 1818927 Signature \_\_\_\_\_ Date \_\_\_\_\_

Original affidavit must be kept in the Special Brokers File and a copy filed with the Division of Insurance of the Commonwealth of Massachusetts within *twenty days* following date of procurement.



PO Box 650 • Barre, VT 05641  
 800-548-4301 • Fax 800-347-4935  
 Visit us at [www.neee.com](http://www.neee.com)

**Quotation**

New England Excess Exchange

Date:

01/20/2021

Quote Number:

10205611 - 1

Hudson Excess Insurance Company

A XV

Proposed Effective Date:

02/22/2021

Proposed Expiration Date:

02/22/2022

Named Insured:

Jolly Green, Inc.

D/B/A:

Named Insured Mailing Address

442 Howard Street, Lunenburg, MA 01462

**Location Address:**

- 60 Franklin Street, Winchendon, MA 01475

**QUOTATION SUMMARY**

Minimum Earned Premium		25.00 %
General Liability Total Premium		\$ 1,000.00
Total Premium		\$ 1,000.00
Other Charges		
Surplus Lines Tax		
Service Fee	Fully Earned	\$ 40.00
		\$ 85.00
<b>Total:</b>		<b>\$ 1,125.00</b>

**PLEASE NOTE:**

- Please review all terms and conditions shown within this quotation with care, as terms and conditions may not conform to the specifications within your submission.
- This Quotation is effective for 30 days from the date quoted, or until the proposed effective date, whichever is earlier.
- To bind coverage we must receive written confirmation of the order of coverage, based on the terms and conditions outlined within this quotation.
- A fully completed, signed and dated ACORD application, as well as any Supplemental Applications attached to this Quotation, must be received prior to binding.
- The TRIA Policyholder Disclosure form (HUD-IL 1001) must be completed, signed and dated prior to binding.

**ADDITIONAL NOTES:**

-

**General Liability**

Policy Form: Occurrence Form

**Limits of Liability**

Per Occurrence:	\$	1,000,000
General Aggregate:	\$	2,000,000
Products / Completed Ops. Aggregate:	\$	Excluded
Personal / Advertising Injury:	\$	1,000,000
Damage to Premises Rented:	\$	100,000
Medical Payments (any one person):	\$	5,000
<b>Deductible (Per Occurrence):</b>	\$	

**Location # 1**  
**Classification Description**  
**Class Code**

**60 Franklin Street, Winchendon, MA 01475**  
**Marijuana Indoor Growing Facilities**  
**73333**

	<b>Exposure</b>	<b>Basis</b>	<b>Rate</b>	<b>Premium (\$)</b>
Premises/Operations	2,500	Area	75.9000	1,000
Products / Completed Operations	0	Area		Minimum Premium Excluded

**Additional Coverages**

**GL Total: \$ 1,000.00**

# POLICYHOLDER DISCLOSURE NOTICE OF TERRORISM INSURANCE COVERAGE

You are hereby notified that under the Terrorism Risk Insurance Act, as amended, you have a right to purchase insurance coverage for losses resulting from acts of terrorism, as defined in Section 102(1) of the Act: The term "act of terrorism" means any act that is certified by the Secretary of the Treasury—in consultation with the Secretary of Homeland Security, and the Attorney General of the United States—to be an act of terrorism; to be a violent act or an act that is dangerous to human life, property, or infrastructure; to have resulted in damage within the United States, or outside the United States in the case of certain air carriers or vessels or the premises of a United States mission; and to have been committed by an individual or individuals as part of an effort to coerce the civilian population of the United States or to influence the policy or affect the conduct of the United States Government by coercion.

YOU SHOULD KNOW THAT WHERE COVERAGE IS PROVIDED BY THIS POLICY FOR LOSSES RESULTING FROM CERTIFIED ACTS OF TERRORISM, SUCH LOSSES MAY BE PARTIALLY REIMBURSED BY THE UNITED STATES GOVERNMENT UNDER A FORMULA ESTABLISHED BY FEDERAL LAW. HOWEVER, YOUR POLICY MAY CONTAIN OTHER EXCLUSIONS WHICH MIGHT AFFECT YOUR COVERAGE, SUCH AS EXCLUSION FOR NUCLEAR EVENTS. UNDER THE FORMULA, THE UNITED STATES GOVERNMENT GENERALLY REIMBURSES 85% THROUGH 2015; 84% BEGINNING ON JANUARY 1, 2016; 83% BEGINNING ON JANUARY 1, 2017; 82% BEGINNING ON JANUARY 1, 2018; 81% BEGINNING ON JANUARY 1, 2019 AND 80% BEGINNING ON JANUARY 1, 2020 OF COVERED TERRORISM LOSSES EXCEEDING THE STATUTORILY ESTABLISHED DEDUCTIBLE PAID BY THE INSURANCE COMPANY PROVIDING THE COVERAGE. THE PREMIUM CHARGED FOR THIS COVERAGE IS PROVIDED BELOW AND DOES NOT INCLUDE ANY CHARGES FOR THE PORTION OF LOSS THAT MAY BE COVERED BY THE FEDERAL GOVERNMENT UNDER THE ACT.

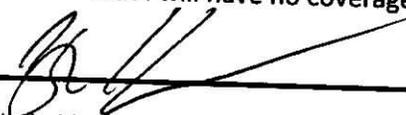
YOU SHOULD ALSO KNOW THAT THE TERRORISM RISK INSURANCE ACT, AS AMENDED, CONTAINS A \$100 BILLION CAP THAT LIMITS U.S. GOVERNMENT REIMBURSEMENT AS WELL AS INSURERS' LIABILITY FOR LOSSES RESULTING FROM CERTIFIED ACTS OF TERRORISM WHEN THE AMOUNT OF SUCH LOSSES IN ANY ONE CALENDAR YEAR EXCEEDS \$100 BILLION. IF THE AGGREGATE INSURED LOSSES FOR ALL INSURERS EXCEED \$100 BILLION, YOUR COVERAGE MAY BE REDUCED.

## Acceptance or Rejection of Terrorism Insurance Coverage

I hereby elect to purchase terrorism coverage for a premium of 1% of the General Liability premium subject to a \$100 minimum and/or 5% of the total Property Premium subject to a \$100 minimum.

I hereby decline to purchase terrorism coverage for certified acts of terrorism. I understand that I will have no coverage for losses resulting from certified acts of terrorism.

X

  
\_\_\_\_\_  
Policyholder/Applicant's Signature

\_\_\_\_\_  
Hudson Excess Insurance Company  
Insurance Company

Jolly Green, Inc.  
\_\_\_\_\_  
Print Name

\_\_\_\_\_  
HBD 10037837 2  
Policy Number

02/22/2021  
\_\_\_\_\_  
Date

- *Restricting Access to age 21 and older*

Our staff age requirements will be 21 and older. No one will be allowed onsite under the age of 21. We will be knowledgeable, friendly resources to owners and agents of retail marijuana stores and processing facilities. Jolly Green is dedicated to raising the standard in product quality and leading by example in creating a higher code of ethics for businesses in the industry to follow.

# Record Keeping Plan





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# Introduction

This Record Keeping Plan describes the policies, procedures, controls, and other measures that will be implemented to ensure a paper and electronic records are properly managed to comply with local and state requirements.

Company records will also be maintained to provide operational information to company managers, advisors, and owners for decision-making purposes, and to provide information in case of insurance, criminal, or regulating authority investigations.

A primary goal is to maintain information that will meet not only regulatory requirements, but also be transparent and admissible in court. State and local laws supersede any item in the Plan that does not meet regulatory requirements.

Within this plan [cannabis/marijuana] is often referred to as “the product.” Where an “employee” is referred to in this plan, it also includes other individuals involved with Jolly Green Inc, including owners, officers, agents, and others representing the company.

Sensitive records include, but are not limited to, personal identity information, protected health information, credit card data, financial records, intellectual property, password records, information related to a criminal investigation, material covered by any non-disclosure agreements, information identified by regulating authorities as restricted, security and operating records for which the availability would make the company vulnerable to criminal activity, and other information for which the degree of adverse effect that may result from unauthorized access or disclosure is high.

Several record keeping policies overlap with other procedures. Some items are repeated in both the Record Keeping Plan and the other plans, and in other cases, this plan refers to the other documents.

# General Record Keeping Policies

## Regulatory Compliance

All records associated with business conducted by Jolly Green Inc will be made available to local and state regulatory authorities upon request or on a regular basis as specified by regulations. Records will be stored in a manner that will make them easily accessible in order to comply with immediate requests for information by local and state authorities.

Records specified for retention under state regulations will be retained for seven years. Records not covered by regulatory standards will be retained for no less than three years.

Should Jolly Green Inc cease operations, the owners/board members will come to an agreement with local and state regulating authorities for the retention of and accessibility to required records for a specified period of time.

Anyone who knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any electronic or paper record will face immediate termination and potential criminal prosecution.

Any employee who becomes aware of another's intent or action related to knowingly altering company records must report the information to a security officer or a senior manager.

## Paper and Electronic Records

Jolly Green Inc will use a record management software to scan and index/tag paper files and store electronic files to ensure rapid and accurate access to records.

Paper records will be scanned into electronic format for backup purposes on a periodic basis, no less than once per month. Once the electronic version of the paper record has been backed up, the paper version may be shredded (if sensitive) or discarded.

Paper records to be maintained for longer than one month will be filed within two months according to a system designated by the officer responsible for records management, in cabinets or boxes that are clearly labeled, and in a secured location.

Electronic records scheduled for destruction will be managed according to Guidelines for Media Sanitation, NIST Special Publication 800-88, Revision 1.

Electronic file organization will follow recommendations from the National Institute of Standards and Technology.

A records backup and archiving policy will be developed by senior managers using tools for the management of electronic records recommended by the National Archives.

Sensitive business files will be maintained in a separately secured server location from files used on a daily basis by regular employees. Employees will only have access to records needed to carry out their responsibilities.

Backup copies of sensitive archived material will be encrypted or password protected and stored in a secured cloud environment, or, if on removable media, off-site in a vault or safe where it is easy to access and easily reproducible.

All archived records to be kept for more than seven years will be converted into a format that is standardized such that changes in software and technology will not prevent access to the records.

The integrity and authenticity of stored data will be maintained to the level that they could be accepted as evidence in a court of law. Jolly Green Inc will develop a protocol for conducting business on paper in the event of an outage of any electronic system, including the transference of the paper data to the electronic system once the problem is corrected. All employees will be trained on the procedures.

## Privacy

A minimum amount of information will be collected during financial transactions with customers to reduce the likelihood that personal information can be stolen.

Only personal information on employees that is required by law will be collected and stored. Employee records, particularly those related to work authorization, potential disciplinary investigations, or background checks will be kept confidential and stored in a secure location.

Any medical information collected on employees or customers will be stored separately and under an extra level of security. These records will be kept in accordance with the Americans with Disabilities Act (ADA), the Genetic Information Nondiscrimination Act (GINA), and/or the Health Insurance Portability and Accountability Act (HIPAA), as applicable.

## Employee Involvement

Staff will be asked to review record keeping procedures related to their specific tasks at least once per year and give recommendations for improvements.

# Roles and Responsibilities

## Chief Compliance Officer

1. The Chief Compliance Officer (CCO) will be responsible for ensuring that this Record Keeping Plan is properly implemented, including dissemination of this plan and the training of employees as to its application. The CCO may designate a Record Keeping Manager to implement certain tasks outlined in this Plan.
2. The CCO will define the structure of a record management system, including a document retrieval system, and maintain training for him/herself and others in the various components of the system.

3. The CCO will develop/maintain an indexing/tagging system which can be utilized to efficiently categorize and retrieve needed data from the document retrieval system.
4. An instruction manual will be written by the CCO describing how to retrieve records from the system. Senior managers will be trained in pulling data from the document retrieval system to ensure that records and datasets can be retrieved immediately upon request from regulating authorities or law enforcement.
5. The CCO is responsible for ensuring the upload of or otherwise providing data from the inventory control or track-and-trace system to the regulating authority in the manner and on the schedule specified by regulations.
6. The CCO will regularly report to the Chief Executive Officer on the status and efficacy of the Record Keeping Plan. The CCO will review the Plan annually and recommend changes or amendments to the Chief Executive Officer to improve procedures or processes.
7. The CCO shall stay up to date on records-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other record keeping experts.

The CCO will coordinate with the officers and managers listed below to ensure that records collected across all departments will be processed according to the Plan.

- Chief Financial Officer
- Security Manager
- Quality Assurance Officer
- Inventory Control Manager
- Computing Security Manager
- Cultivation Manager
- Transportation Manager
- Manufacturing Manager
- Processing Manager

## Record Keeping Manager

1. Receiving and organizing documents from all departments
2. Indexing documents in the document retrieval system
3. Recommend changes to the CCO related to the indexing/tagging system

## Record Types

### Business Records

- Deeds, titles, rental agreements, property records
- Most recent versions of operating plans
- Tax records required by federal, state, and local authorities, including records of late payment penalties and unpaid tax obligations
- Insurance documents
- Permits and licenses
- All correspondence with regulatory authorities
- Up-to-date local and state regulations related to the cannabis license, waste management, environmental compliance, hazardous materials, etc.
- Business documents filed with the Secretary of State
- Business property inventories and related records
- Employee forms, including IRS forms, background check results, documentation of proof of authorization to work, reference verifications, evaluations, and records of investigations and disciplinary actions. Each employee's personal information will only be collected as required by law to reduce potential incidents of identity theft
- OSHA requirements and documentation related to workplace injury, OSHA Form 300, or Form 301 if injuries have occurred
- Property diagrams
- Collective or Cooperative Membership Agreement (if applicable)
- Records relating to physical modification of or upgrades to the premises
- Manufacturer's records related to any generators to be used on the premises and permits or other compliance documentation from air quality regulators
- Labor agreement.
- Staffing plans, organizational charts, and job descriptions.

- Accounting records including, but not limited to, bank statements; monthly, quarterly and annual financial reports; ledgers and journals; vouchers; and all supporting documentation.
- Complete sales receipts/invoices containing all data required by regulating authorities.
- Purchasing receipts/invoices.
- Utility records, including documentation from electrical utility indicating greenhouse gas emission intensity per kilowatt hour (if available).
- Payroll records.
- Records of stipends, bonuses, and non-monetary compensation to individuals or companies, including benefits. The records will include an estimated dollar value for non-monetary compensation.
- Records documenting community involvement.
- Updated emergency contact lists.
- Training records, including type of training offered, date taken, and names of trained employees.
- Meeting minutes and memos.

## Security Records

- Training records, including type of training offered, date taken, and names of trained employees.
- Police reports resulting from any crime-related event on the property.
- Contracts with outside security providers.
- Security equipment manuals and maintenance and inspection logs.
- Surveillance video: See the Security Plan for details.
- Completed closing procedure checklists.
- Updated lists of employee access levels.
- Security access logs (See Security Plan, Appendix A).
- Signed Key/Key Card User Agreements (See Security Plan, Appendix B).
- Weekly electronic records showing the date, time, and name of personnel accessing secured areas.
- Completed exiting employee checklists.
- Completed visitor logs (See Security Plan, Appendix C).
- Product delivery logs maintained by security personnel (See Security Plan, Appendix D).
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Incident reports related to emergencies, chemical spills, accidents, external threats, workplace violence, harassment and other unexpected events.

## Inventory Control Records

- All information created within the inventory control/track-and-trace system selected by the regulating authority.
- All UIDs assigned to products in inventory and all unassigned UIDs. UIDs associated with product that has been retired from the track-and-trace system will be retained for six (6) months after the date the tags are retired.
- All attributes associated with each product UID, including name, type, batch, strain, weight/count, source (if transferred in from another licensee), and transaction dates and times. Additional details required by the regulating authority will also be collected and maintained.
- Updated lists of employees with access to the inventory system.
- Training records, including type of training offered, date taken, and names of trained employees.
- Logs of errors found within the inventory system and notes on steps taken to correct errors.
- All inventory results, including the date, time, and names, signatures, and titles of inventory takers.
- Records regarding missing inventory and documentation of follow-up actions.
- Records of inventory discrepancies reported to law enforcement and/or regulating authorities.
- Documentation regarding notifications from the inventory system that cannot be resolved within the specified timeframe.

In addition to records required by regulations, electronic sortable reports related to the following will be producible for management purposes.

Location of all products on the premises by room/cabinet/storage location, including UID, description, date and time transferred to location, weight or count, name or ID of employee. Reports of products removed from a storage location, including date and time, UID, description, name or ID of employee, weight or count, and destination.

Reports of transferred products by UID that can be compared electronically pre and post-transfer to identify discrepancies in inventory, and reports of the resulting comparisons. Reports showing trends in sales patterns, demographics, product quality, or other attributes. Additional reports requested by senior managers or regulating authorities.

## Computing Security Records

- Signed Network and Computing Resources User Agreements (See Security Plan, Appendix E).
- Software contracts/licensing documentation.
- Electronic record retention policies.
- Documentation of unauthorized attempts to access the computer network.
- Records of device, software, operating systems, and network security updates.
- Results of security audits.
- Certifications of electronic records destruction or disposal.
- Other records selected by the Computing Security Manager for backup to the records management system.

## Cultivation Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to cultivation activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Scale calibration logs.
- Chemical Safety Data Sheets.
- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to the disposal of hazardous waste.
- Environmental compliance documentation.
- Documentation of the previous use of land (if applicable).
- Water supply records.
- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Record of internally-identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.

- Sampling and testing specifications and results and other quality assurance documentation.
- Janitorial logs relating to sanitation of facilities.
- Maintenance logs, including inspection and repair, relating to lighting, irrigation and ventilation systems, pest control systems, water and effluent discharge systems, etc.
- Record of product complaints and steps taken to resolve issues.
- Adverse event records (related to a negative effect of a product on a user).
- Records relating to product rejections or recalls, including a recall plan.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Documentation of data utilized for setting prices and rationale for the selected price.
- See the Cultivation and Chemical Safety Plans for additional record types related to planting, pruning, propagation, harvesting, and fertilizer and pesticide use.

## Transportation Records

- In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, Jolly Green Inc will retain the following records related specifically to transportation activities:
- Transportation manifests showing all information required by regulating authorities.
- Records showing trip plans and the start and end times of each trip.
- Documentation of approved changes to trip plans.
- Transportation Event Logs of variances between expected and actual trip activities.
- Records of vehicle accidents.
- Records and police reports related to product losses occurring during transportation activities.

## Manufacturing Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to manufacturing activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Chemical Safety Data Sheets.
- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to the disposal of hazardous waste.
- Environmental compliance documentation.
- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Product specifications.
- Sampling and testing specifications and results and other quality assurance documentation.
- Record of identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.
- Record of product complaints and steps taken to resolve issues.
- Adverse event records (related to a negative effect of a product on a user).
- Records relating to product rejections or recalls, including a recall plan.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Janitorial logs relating to sanitation of facilities.
- Documentation of data utilized for setting prices and rationale for the selected price.

## **Packaging and Labeling Records**

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to packaging and labeling activities: Training records, including type of training offered, date taken, and names of trained employees.

## Dispensary Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to dispensary activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Records required relating to the sale of products to medical patients (if applicable).
- Documentation of data utilized for setting prices and rationale for the selected price.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.

## Other Records

- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Record of identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Janitorial logs relating to sanitation of facilities.

# Staffing and Training Plan

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# Introduction

The information in this plan is designed to provide guidance for managers and supervisors related to the responsibilities of staffing and hiring. This plan is designed to support the development of human capital and staff capabilities in order to maximize the efficiency and effectiveness of the organization. It will be reviewed and updated six months after the company starts operations and annually thereafter to adapt to changes in the needs of the company or trends in the industry.

Jolly Green Inc is committed to following all local, state and federal laws related to labor and employment. Jolly Green Inc will adhere to requirements as described by:

- The Wage and Hour Division of the U.S. Department of Labor
- The MA. State labor regulator of labor.

Jolly Green Inc 's employment practices are based on job qualifications, performance, and conduct without regard to race, color, religion, national origin, age, sex, marital status, height, weight, disability, genetic information, or any other legally protected status.

The Jolly Green Inc provides reasonable accommodation to qualified individuals with disabilities in accordance with the law. Any employee with a need for accommodation due to a disability will be encouraged to notify his/her supervisor as soon as possible.

It is in our best interest to hire individuals according to planned needs. The staffing portion of this plan is designed to estimate the positions that will be necessary to efficiently manage the business and specify the job descriptions and expected qualifications for each.

## General Staffing Policies

Jolly Green Inc will use best practices to staff positions and retain employees. The following policies will be carried out to ensure efficient operations:

- Include managers in the hiring process for positions they will be responsible for supervising.

- Ensure that an adequate number of employees are hired and scheduled for each shift to reduce stress caused by continuous overwork.
- When appropriate, employees will be cross trained such that they may provide assistance to another department that temporarily becomes busier than normal.
- Ensure that backup support is available through a system of on-call or part-time workers in case scheduled staff cannot come in for a shift.
- Managers will maintain a combined record of additional educational qualifications and skills that employees have such that new opportunities may be filled from within the company when possible.
- Utilize a Hiring Tracker (Appendix A) to manage the status of hiring employees.
- Utilize a variety of recruiting resources, including online career websites, recruiting agencies, job fairs, placement departments at training agencies, etc.
- Utilize an Intake Checklist (Appendix B) to ensure all documentation is properly collected and activities associated with hiring an employee are completed.
- Provide an environment in which employees feel respected and appreciated for quality work.
- An Employee Handbook will be provided to all staff as part of the training process specifying expected behaviors, company policies, and a disciplinary procedure.
- Managers will be trained in best hiring practices, effective training techniques, and appropriate evaluation methods, which are further detailed in sections below.

## Staffing Requirements

The following table specifies the essential staffing positions that need to be filled and anticipated associated costs related to their functions.

Primary Employee	Man-hours/Week	Function	Relative Importance of Function	Estimated Cost/Mo.*	Notes
Chief Executive Officer	N/A	Overall Business Management	Critical		
Chief Compliance Officer	40	Compliance with Regulations and	Critical		

		Procedures			
Chief Financial Officer	40	Finances and Accounting	Support		
Security Manager	40	Security Management	Critical		
Computing Security Officer	20	Computer Security	Support		
Inventory Control Manager	40	Inventory Control Management	Critical		
Facilities Manager	40	Facility Management	Critical		
Facilities Asst Manager/Staff	40	Facility Management Support	Support		
Quality Assurance Officer	40	Quality Assurance	Support		
Record Keeping Manager	40	Record Keeping	Support		
Security Staff	196 (2 during all business hours)	Security Operations	Critical		
Inventory Control Staff	40	Inventory Control Operations	Critical		
Sales Manager	40	Sales	Critical		
Facilities Staff	40	Facility Operations	Support		

Cultivation/ Mfg. Manager	40	Cultivation/ Mfg. Operations	Critical		
Cultivation/ Mfg. Staff	168	Cultivation/ Mfg. Support	Critical		

\*Estimated Cost refers to monthly salary/benefits, payroll taxes and other insurances.

## Organizational Chart

Board of Directors

Chief Executive Officer

Chief Compliance Officer

Inventory Control Manager

Inventory Control Staff

Computing Security Manager

Security Manager

Security Staff

Record Keeping Manager

Quality Assurance Officer

Quality Assurance Staff

Facilities Manager

Facilities/Janitorial Staff

Chief Financial Officer

Sales Manager

Sales Staff

Director of Production Cultivation

Cultivation/Manufacturing Manager

Cultivation/Manufacturing Staff

IPM/Pest Control Manager

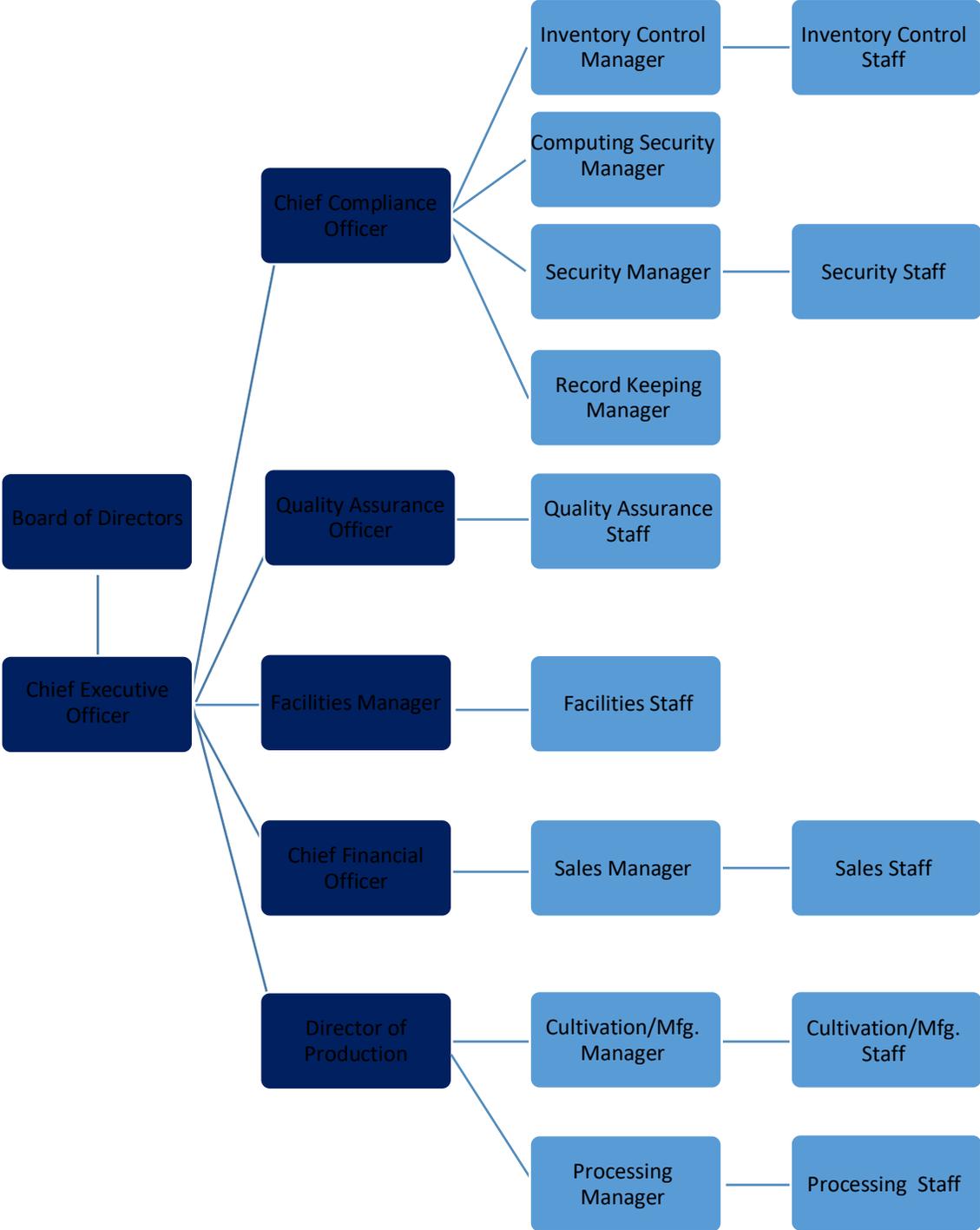
Propagation Manager

Trimming/Processing Manager

Processing Staff



# Organizational Chart



# Job Descriptions

## Chief Executive Officer

The Chief Executive Officer (CEO) is the primary representative of the company to regulators, law enforcement, and the public and provides direction and leadership in the company's mission, vision, values, and strategy. The CEO implements and manages the strategic services, goals and objectives of the organization. It is also an important role of the CEO to set an example of professionalism and respect for others in all areas of operations.

Responsibilities include, but are not limited to:

- Operate the organization according to direction provided by the Board of Directors.
- Facilitate an open communication system to support operations and administration of the Board by advising and informing its members.
- Report progress and statistical performance measures to the Board on a quarterly basis.
- Oversee all operations and business activities to ensure they produce the desired results based on goals and timelines.
- Hire qualified personnel for Executive Staff positions.
- Build and maintain a positive working relationship with Executive Staff and be open to suggestions for improvements from employees.
- Enforce adherence to legal guidelines and standard operating procedures to maintain the company's legal status and business ethics.
- Implement the Business Plan and make suggestions for its improvement.
- Set goals for performance and growth.
- Review financial and other reports to track business performance and devise methods for improvements.
- Build relations with key partners and stakeholders and act as a point of contact for investors.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Analyze problematic situations and occurrences and provide solutions to ensure company success and growth.
- Maintain a deep knowledge of the cannabis markets and industry
- Stay up to date on management-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations,

participating in conferences, and/or other means of networking with and learning from other management experts.

Requirements:

- BA in business required
- 2 years of experience working in the pharmaceutical or cannabis field desired
- In-depth knowledge of corporate governance and general management best practices
- Ability to demonstrate an understanding of business functions, including finances, HR, sales, and marketing
- Strategic planning and business development experience
- Excellent communication skills
- Ability to pass a background check

## Chief Compliance Officer

The Chief Compliance Officer (CCO) reports to the CEO and is responsible for implementing the Security Plan, the Inventory Control Plan, and the Record Keeping Plan by managing designees who will be responsible for a subset of tasks.

Responsibilities include, but are not limited to:

- Manage security compliance according to state guidelines and the Security Plan.
- Have a sufficient understanding of computing security to the extent that he or she is able to select a qualified individual or contractor to implement the computing security component of the Security Plan.
- Manage a budget covering compliance-related resources.
- Work with local and state government agencies on environmental issues and specific licensing requirements.
- Serve as the company's secondary expert (after the Inventory Control Manager) in the use of the Inventory Control System and ensure compliance with all related regulations.
- Monitor and interpret the regularly changing rules of state cannabis commerce and communicate with staff accordingly.
- Define the structure of a record management system, including a document retrieval system, in compliance with the Record Keeping Plan.
- Oversee the training compliance system for all employees.
- Work closely with the Quality Assurance Officer to monitor and improve the implementation of standard operating procedures.

- Oversee the maintenance of records such that requests for information from regulating authorities or law enforcement will be met by required deadlines.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Stay up to date on compliance-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other compliance experts.

Requirements:

- Ability to demonstrate an extensive knowledge of state and local cannabis compliance laws
- Proficiency or willingness to rapidly undertake extensive training in the use of the state’s selected inventory tracking system
- 3 years of experience in management or HR in a related industry
- Familiarity with team building and training employees on compliance issue
- Motivated self-starter and proficient at multi-tasking
- Aptitude in solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

## **Inventory Control Manager**

Under the direction of the CCO, the Inventory Control Manager (ICM) will be responsible for carrying out tasks specified in the Inventory Control Plan. In consultation with the CCO and the QAO, the ICM will recommend changes and amendments to the Inventory Control Plan on an annual basis.

Responsibilities include, but are not limited to:

- Serve as the company expert on the state-required inventory control system (ICS) and be aware of updates and compliance requirements related to the system
- Act as the point of contact with the system vendor
- Train and manage at least one other employee to have a sufficient knowledge in the use of the ICS to carry out upper level functions in the absence of the ICM and the CCO
- Train incoming employees on the use of the ICS based on the requirements of his or her position

- Foster a spirit of cooperation, respect and professionalism among employees and other managers
- Maintain ICS training records and all other documentation and logs per regulations and procedures
- Keep related equipment in good working condition and secured when not in use
- Develop a method to collect inventory information in the event of loss of access to the electronic inventory system
- Carry out inventory verifications and report discrepancies
- Resolve system notifications within a specified time period
- Run reports from the ICS as requested

Requirements:

- 2-3 years of experience in a management position in a related industry
- 2 years of experience working with a computer-based inventory system
- Experience in the cannabis industry preferred
- Willingness to quickly learn regulations related to inventory control and participate in extensive training to develop an expertise in the ICS
- Ability to pass a background check

## Record Keeping Manager

The Record Keeping Manager (RKM) reports to the CCO and is responsible for complying with record-related regulations and implementing tasks in the Record Keeping Plan. Records are maintained to provide operational information to company managers, advisors, and owners for decision-making purposes, and to provide information in case of insurance, criminal, or regulating authority investigations.

Responsibilities include, but are not limited to:

- Manage records within a digital, indexed record management software such that materials may be quickly retrieved in the event of a request from regulators or law enforcement officials
- Work with the CCO to improve indexing or tagging categories to apply to each document
- Scan paper records into the record management system on a daily or weekly basis
- Delete or discard digital and paper records according to the company's record retention policy

- Work with the Computing Security Manager to ensure records are stored securely, backed up, and easily accessible

Requirements:

- Must be at least 21 years of age
- Must have at least 2-3 years of administrative or record keeping experience, preferably in a legal, tax or other highly regulated industry
- Experienced in using standard computer programs and able to learn new softwares within a relatively brief time period
- Willing to rapidly become familiar with regulations and record keeping standards
- Able to pass a background check

## Security Manager

Under the direction of the CCO, the Security Manager (SM) is responsible for carrying out the bulk of the responsibilities identified in the Security Plan and managing Security Officers.

Responsibilities include, but are not limited to:

- Implement and enforce safety regulations and policies.
- Ensure the protection of people, property, and assets.
- Reduce risks, respond to incidents, and limit liability in all areas of financial, physical, and personal risk.
- Act as liaison to the local Police Department (PD).
- Schedule all security services and officers.
- Manage a budget covering security resources and employees.
- Ensure all security equipment and systems are operated and maintained according to manuals, standard security practices, and the Security Plan.
- Administer the access control program, including the enrollment of personnel in the company's access control system.
- Compile reports as required by the CCO.
- Utilize all security systems to discover security breaches and identify compliance issues.
- Train personnel according to established procedures and conduct regular security meetings to discuss problems and future plans.
- Ensure the maintenance of training records and security logs.
- Manage all visitor access to the facility.
- Act as liaison to all departments on security measures, procedures, and needs.

- If the company also carries out transportation responsibilities Coordinate the security of transportation activities, including the planning of delivery routes to ensure the safety and security of the delivered goods and employees.
- Conduct security evaluations to ensure constant improvement and compliance.
- Ensure the reporting and documentation of all incidents and provide initial information for investigations to the CCO.
- Ensure that all records are forwarded properly according to the Record Keeping Plan.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Stay up to date on security-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other security experts.

#### Requirements:

- 5-10 Years Security Management Experience
- Minimum of HS Diploma or equivalent, college degree preferred
- Board certified in security management by ASIS International as a CPP highly preferred
- Must be willing and able to work a flexible schedule based on the demands of the business
- Aptitude for solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

### **Security Staff, Unarmed**

Security Staff report to the Security Manager and assist in maintaining the safety and security of the staff, products, and the facility.

Responsibilities include, but are not limited to:

- Conduct periodic inspection of premises to protect against fire, theft, vandalism, and illegal activity.
- Maintain required records and logs.
- Prevent access to any unauthorized persons within the registered premises
- Assist any staff with security access issues.
- Monitor any suspicious behavior by guests, visitors, or personnel.

- Ensure compliance with state and local regulations and company procedures.
- Prepare reports as requested by the Security Manager.

Requirements:

- At least 21 years of age
- A current security guard license or the ability to receive a license, including a background check
- Prior security, law enforcement or military experience preferred

## Computing Security Manager

Under the direction of the CCO, the Computing Security Manager (CSM) will manage the security related to data and technology and will be responsible for ensuring compliance with the Computing Security portion of the Security Plan.

Responsibilities include, but are not limited to:

- Interpret and establish security technologies and create an information security framework and architecture that protects sensitive data from threats.
- Monitor computing operations and infrastructure by reviewing alerts and logs on a daily basis.
- Ensure that security tools and technology are maintained and updated.
- Ensure that security vendors are appropriately vetted, meet contractual agreements and comply with regulations and policies.
- Identify patterns in which employees are failing to comply with procedures and recommend additional training or procedure updates to the CCO.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Manage a budget related to computing resources.
- Evaluate new technologies and make recommendations for their use to the CCO based on industry standards and company needs.
- Audit internal security systems and policies frequently to identify areas needing improvement.
- Develop and maintain a detailed security incident response program.
- Regularly report to the CCO on the status of computing security.
- Stay up to date on computing security-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations,

participating in conferences, and/or other means of networking with and learning from other cybersecurity experts.

Requirements:

- 6-10 years of Computing Security Management experience or a bachelor's degree in computer science, programming or a similar field from an accredited institution and 4 or more years of experience
- Ability to demonstrate an expertise and knowledge of databases, networks, hardware, firewalls and encryption
- Aptitude in solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

## Quality Assurance Officer

The Quality Assurance Officer (QAO) reports to the CEO and will be involved in decision making related to changes to policies and processes. Guided by the Quality Assurance Plan, he or she will facilitate improvements to plans, products, and systems within the company in response to employee, customer, and regulating authority feedback.

Responsibilities include, but are not limited to:

- Work closely with the Chief Compliance Officer and other managers to monitor and improve Standard Operating Procedures.
- In departments that utilize mechanical equipment, work with managers and employees to develop step-by-step procedures and maintenance logs for the use, sanitation and inspection of each item.
- Assist managers with employee training by preparing instructional materials, hands-on exercises and evaluation tools.
- Complement training conducted by other managers by providing in-person training on issues related directly to quality control.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Monitor the introduction of new systems, equipment, and products, such that potential quality issues may be identified prior to the implementation of new processes.
- Maintain an awareness of regulations related to SOPs and product quality control.

- Maintain an updated source for all current policy and procedure documents in both paper and digital format and ensure easy access to employees at all levels.
- Work with department managers to conduct job risk analyses and make training and procedure recommendations based on the results.
- Perform a periodic analysis of reports and production data to identify problematic patterns and recommend updates or changes to policies and procedures.
- Assist with regulatory inspections.
- Implement procedures related to adverse events and recalls according to the Quality Assurance Plan.
- Stay up to date on quality-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other quality assurance experts.

#### Requirements:

- 3 - 5 years of experience in Quality Assurance in a related field or a Bachelor's degree in Quality Assurance from an accredited institution and 1 - 2 years of experience
- Experience in employee training
- Aptitude in solving problems independently
- Strong verbal and written communications
- Ability to think critically and logically in applying systems and processes to meeting company goals
- Ability to pass a background check

## Facilities Manager

The Facilities Manager (FM) reports to the CEO and is responsible for building maintenance, environmental controls, operations and safety, janitorial services, sanitation, storage and maintenance of chemicals, and non-cannabis/marijuana waste management.

Responsibilities include, but are not limited to:

- Maintain lighting, HVAC and mechanical systems in excellent working condition.
- Coordinate with the Security Manager to maintain the function and safety of the facility's hardware and infrastructure.
- Manage a budget associated with facilities functions.
- Hire, manage and train facilities staff.

- Create and implement task-specific SOPs and carry out job risk analyses with the assistance of the Quality Assurance Officer.
- Be aware of federal, state and local regulations related to cannabis/marijuana business premises requirements.
- Be familiar with local building code and permit regulations.
- Develop a maintenance and inspection schedule for all building and infrastructure systems.
- Conduct or oversee the routine maintenance and inspection of environmental and other major systems critical to the operation of the organization.
- Develop and maintain logs and checklists to simplify maintenance and inspection activities.
- Schedule and facilitate required inspections by outside organizations.
- Determine which types of work can be handled by company personnel and under what circumstances an outside contractor must be called in.
- Serve as the lead responder to critical equipment malfunctions, including the maintenance of a list of critical equipment and phone numbers to call in case of breakdowns.
- Maintain an on-site inventory of selected equipment parts to facilitate rapid repairs in the event of a malfunction.
- Work with the Security Manager to support the maintenance of security systems.
- Manage chemicals, non-cannabis/marijuana waste and other refuse.
- Train facilities employees in the proper procedures for handling and disposing of chemicals, including the [Globally Harmonized System](#) of Classification and Labeling of Chemicals (GHS) and the use of Safety Data Sheets (SDSs).
- Keep records of training for each training module related to chemicals and non-cannabis waste management for every facilities employee, including the date training occurred, type of training, the signature of the employee upon completion of training, the signature of an authorized person who can verify completion of training, and the date retraining is due
- Forward all records and logs to the Record Keeping Manager
- Become familiar with all company Standard Operating Procedures to identify areas in which the Facilities Department may support other business activities.

#### Requirements:

- At least 5-10 years of building/facilities management experience, including repairs to mechanical and structural components
- Experience with electrical, HVAC, lighting, plumbing, ventilation and other infrastructure component installation and adjustments
- Experience working with outside vendors and contractors

- Excellent organizational, planning and problem-solving/troubleshooting skills
- Must be able to work independently with limited supervision

## Chief Financial Officer

The Chief Financial Officer (CFO) will be responsible for finances and accounting, as well as overseeing activities carried out by the Sales Manager.

Responsibilities include, but are not limited to:

- Perform the day-to-day, monthly and year-end operations of the Accounting/ Finance Department.
- Assist the CEO on all strategic and tactical matters as they relate to budget management, cost–benefit analysis, forecasting needs and the securing of new funding.
- Manage the sales operation of the company through the supervision of a Sales Manager.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Create financial reports such as P&L, Balance Sheet, Cash Flow and budget performance.
- Present and interpret financial data for the Executive Staff and the Board of Directors.
- Ensure compliance with applicable standards, rules, regulations, and systems of internal control.
- Perform the processing and recording of accounts payable transactions.
- Ensure that all invoices and staff reimbursements are paid accurately and in accordance with standard practices.
- Manage the processing of cash receipts, recording of revenue and receivable.
- Ensure that revenues and receivables are correct and maintained.
- Prepare and record taxes for the company (Sales, Payroll, Local) and work with the CPA on Corporate taxes.
- Perform the processing of functional and benefits expense allocations, monthly accruals, amortization of prepaid expenses, fixed assets depreciation and recording of adjusting and reclassification journal entries, if necessary.
- Perform general accounts analysis and reconciliations, including bank statements, fixed assets, employer’s benefit costs, accruals and prepaid expenses
- In cooperation with the CCO and the ICM, ensure that the Point-of-Sale System is fully integrated into the Inventory Control System and be responsible for its accuracy and maintenance.

- Stay up to date on finance-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other finance/accounting experts.

#### Requirements:

- At least 5 years of experience in accounting for a similar business size and a Bachelor's Degree in Business or Accounting, CPA preferred
- If less than 3 years of experience in sales, willingness to attend training related to managing sales personnel
- Expert knowledge in Quick Books
- Strong organizational skills and ability to prioritize workload in order to meet tight deadlines in a fast-paced and dynamic work environment
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management
- Excellent analytical and problem-solving skills
- Proficient in Microsoft Office (Word, PowerPoint, Excel)
- Highly detail oriented and proficient in record keeping
- Team player and able to collaborate with others in the organization
- Ability to pass a background check

## Sales Manager

The Sales Manager reports to the CFO and will serve as the lead in developing sales and marketing strategies that will result in success in a highly competitive industry. A candidate having existing contacts with established businesses will be given preference.

#### Responsibilities include, but are not limited to:

- Work with the executive team to develop a sales/marketing strategy and identify potential customers.
- Maintain vendor and client databases and relationships.
- Attend and exhibit at trade shows.
- Develop new business relationships in line with the company's strategy.
- Gather related sales data, conduct analyses, and refine the strategy as needed.
- Have a detailed understanding of inventory and prices.
- Guide the marketing strategy based on vendor and consumer feedback.

## Requirements

- At least 21 years of age
- A minimum of 3 to 5 years of sales experience in a related industry, previous experience in the cannabis/marijuana industry preferred
- Strong background in developing business relationships
- Articulate, with effective verbal and written communication skills
- Proficiency with sales management and presentation tools
- Ability to pass a background check

## Director of Production

The Director of Production reports to the CEO and is responsible for the overall management of cultivation and manufacturing activities.

Responsibilities include, but are not limited to:

- Manage the budgets, overall supply chains, and operations of the cultivation and manufacturing activities.
- Implement the Cultivation and Manufacturing Plans, primarily through the hiring and supervision of the Cultivation and Manufacturing Managers.
- Ensure product safety and work with other department heads to comply with regulations and required security, inventory control, and other procedures.
- Prepare reports on production, expenses, product quality, safety, etc.
- Analyze report results and prepare recommendations for improvements.
- Present data to the other Executive Staff and to the Board of Directors as requested
- Maintain inventory levels to ensure timely delivery of products to customers.
- Research new technologies that may improve efficiency, safety, and productivity and make recommendations to Executive Staff.
- Regularly meet with Managers and the Quality Assurance Officer to discuss potential new technological ideas, improve procedures and ensure compliance with regulations.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Stay up to date on cultivation/manufacturing-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related

organizations, participating in conferences, and/or other means of networking with and learning from other experts.

## Requirements

- A minimum of 3-5 years of experience in cultivation or manufacturing management and leadership experience, including agricultural, pharmaceutical, or herbal medicine industries; Bachelor's degree in a manufacturing or agricultural production field preferred
- A basic understanding of the processes involved in both cultivation and manufacturing; knowledge of the cannabis/marijuana industry preferred
- Strategic planning and business development experience
- Ability to resolve problems with and between employees in a respectful and fair manner, based on sound human resources principles
- Ability to demonstrate experience in improving production and efficiency
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management
- Ability to quickly become familiar with all regulations and Standard Operating Procedures and monitor regulatory updates

## Cultivation Manager/IPM Manager

The Cultivation Manager reports to the Director of Production and manages a team of cultivation staff members in the production of high-quality cannabis/marijuana plants and plant materials.

Responsibilities include, but are not limited to:

- Manage a team that handles all aspects of daily cultivation activities in a large-scale indoor grow facility.
- Outline specific roles and responsibilities for plant technicians and work with management to build a team.
- Create and implement task-specific SOPs and carry out job risk analyses with the assistance of the Quality Assurance Officer.
- Provide weekly updates to the Director of Production to consistently re-address grow tactics.
- Maintain indoor plant growing protocols, develop and test nutrient regimens, and strive to improve planting techniques and yields.

- Execute the pest management program including elimination of all types of mold, powdery mildew, spider mites, root aphids, fungus gnats, etc.
- Work with the Inventory Control Manager to perform all cultivation tracking with the inventory control system in compliance with rules and regulations.
- Manage plant scheduling to accurately project all growing requirements on a daily, weekly, and monthly basis to maximize high-quality yield.
- Schedule, manage and oversee cloning processes, achieving a minimum 90% success rate.
- Manage the maintenance of irrigation, climate control systems, cleaning, sanitation, hazard action plans and alert management if there are issues.
- Train employees in task-related processes and health and safety issues.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Ensure that logs and other records are forwarded to the Record Keeping Manager.
- Work closely with the Quality Assurance Officer to monitor and improve the implementation of standard operating procedures.
- Maintain records such that requests for information from regulating authorities or law enforcement can be met by required deadlines.

#### Requirements:

- Completion of a course in Plant Pathology from an accredited institution with the equivalent of a B or better as a final grade
- A minimum of 3-5 years of experience managing a marijuana cultivation facility
- Experience developing task-specific procedures and training employees
- Mastery of all grow mediums and irrigation methods
- Experienced in cloning, transplanting, defoliation, super cropping, topping, flushing, pest management, harvesting, drying, trimming, waste disposal and inventory management
- Knowledge of large-scale commercial plant growing including crop rotation management, nutrient requirements, mediums, light requirements, and environmental controls
- Knowledge of plant diseases, pests, and nutrient deficiencies and toxicity
- Advanced knowledge of the cannabis plant and genetics
- Knowledge of industry best-practices and current on new techniques with respect to the nutrient needs of individual strains and high yield recipes
- Strong attention to detail, ability to communicate clearly
- Ability to pass a background check

## Training Policies

The Executive Staff are responsible for ensuring that all training required by procedures and regulations is provided at no cost to the employee. Per 935 CMR 500.105(2) and 935 CMR 500.101(1)(C)(8)

The Quality Assurance Manager will also evaluate and identify areas where specified training is lacking, create or advise on providing the new training as needed, and assist in modifying procedures to thereafter require the new training.

The Chief Compliance Officer will designate an employee to keep track of training completion and the frequency of repeated training, as well as manage a reminder system to keep employees informed of due dates of future training.

All employees will have records of training held on site in the administrative offices and archived in the document retrieval system.

The Training Matrix in Appendix C provides a list of training topics and the related operating plan that may be consulted for further details.

## Manager Training

Jolly Green Inc will provide the training to managers in the areas of hiring, training, and performing evaluations. Managers are encouraged to suggest additional training topics as needs arise.

### Best Practices in Hiring

In order to ensure a hiring strategy that is consistent, in compliance with legal requirements, and that attracts and keeps high quality employees, managers will be trained in the following:

- The importance of evaluating internal and external business trends to estimate the number and types of employees needed. Internal factors include changes in work shifts, workforce demographics, and downsizing. External factors include a merger or acquisition, changes in legislation, etc.

- How to write and update job descriptions, including required qualifications, particularly noting whether the position requires skills that have already been learned or if on-the-job training is appropriate. Preparation should include asking the following the questions:
  - (a) what skills, knowledge, and abilities are required for the job;
  - (b) what are some of the characteristics of the people who succeed or fail in the job;
  - (c) what qualifications are needed for the job; and
  - (d) how does the job relate to others.
- To avoid illegal screening of applicants with disabilities, list job duties describing only what the necessary tasks are, rather than how the tasks are normally performed.
- The need to develop an interview guideline to ensure a similar process is used during all interviews for the same position. The guideline should include standardized questions given in a specific order, a relatively controlled length of time for the interview, and a standardized evaluation form to be filled out by the interviewer.
- Take into account that people may feel anxiety during a formal interview, which may misrepresent their true potential.
- Clearly communicate to potential employees the salary, work schedule, and potential future opportunities within the company to reduce misunderstandings after hiring.
- Ask appropriate questions during the interview process to match a potential employee's likes and dislikes with a position that fits their personal preferences.
- Limitations on what an interviewer may ask related to age, disabilities, etc., to be in compliance with regulations.
- If any pre-employment testing is utilized, only testing instruments may be used that are clear and understandable, have been demonstrated as valid for the skills being assessed, and are appropriate for the target population.
- References must be checked and adequately documented.
- All documentation is forwarded to the Record Keeping Manager.

## Effective Training Techniques

- Provide adequate training to employees prior to their first day of work.
- Utilize a variety of instruction methods, such as writing on a board, digital presentations, viewing videos, storytelling, etc.
- Involve students interactively through the use of quizzes, small group activities, case studies, Q&A sessions, question cards, role playing, physical demonstrations, identifying problems in a scene, etc.
- Where appropriate, hands on training is preferred to other methods.
- Upon hiring new employees after the business has started operations, match experienced personnel with beginners to provide support when questions or emergencies arise.
- Each in-person training session must have a sign-in sheet that is used to document the employee's fulfillment of a training requirement. The sheet should include the name of the training module, the date training occurred, the signature of the employee upon completion of training, the signature of an authorized person who can verify completion of training, and the date retraining is due. The completed sheet is forwarded to the Chief Compliance Officer (CO) and the Record Keeping Manager.

## Evaluating Employees

- Carry out regular evaluations to provide positive feedback to workers and identify areas where more training or effort on the part of the employee may be needed.
- Design the evaluation such that an employee feels more confident about doing his/her work after the meeting.
- Avoid stereotyping an employee by gender, culture, disability, etc., which can lead to a misinterpretation of an employee's responses or behavior during an evaluation.

- In addition to annual performance reviews, managers may wish to carry out more frequent “check-ins” to learn about employee concerns and suggest small modifications to processes.
- Prior to an evaluation:
  - Select a private location for the evaluation that will reduce potential interruptions.
  - Schedule an appointment with the employee, giving him/her enough time to prepare. Provide the employee with his/her job description and have the employee prepare a short self-evaluation. The employee may already be aware of shortcomings in his or her work that need to be addressed.
  - Review the employee’s file, including results of prior reviews.
  - Review any datasets that provide information on the employee’s work effort, such as sales results or productivity indicators.
  - Compile any information that has been learned from communication with supervisors or coworkers that may need to be addressed during the meeting.
  - Identify accomplishments for which the employee deserves positive recognition.
  - Prepare a list of questions to ask to help identify areas that may need improvement and to gauge the employee’s job satisfaction.
  - If an employee’s performance needs to improve, decide ahead of time if it will be a verbal or written warning. Verbal warnings should be documented in the employee’s file. If a written warning is appropriate, prepare a detailed list of expectations based on policies and procedures that will need to be met. This may be presented as a Notice of Needed Improvements (Appendix D).
- If an employee makes any negative comments or becomes emotional, view it as an opportunity to learn about a concern. Do not be critical of an employee’s emotions. The conversation should be refocused on facts rather than assumptions or feelings. The evaluator should work with the employee to identify a solution to the problem, if not during the meeting, then as soon as possible thereafter.
- Do not insult an employee. Concerns about his or her work must be presented honestly, and simply described as the need to meet specific expectations.
- Explain to the employee what the impacts are of his/her inappropriate behavior.
- Employees should be given an opportunity to improve performance before written disciplinary documentation is placed in his/her file. Find out if repeated tardiness, extensive periods of time on the phone, or other behaviors are due to difficulties that could be helped with counseling or other assistance.

- Prior to implementing a disciplinary procedure, the manager should verify the facts regarding the misconduct and confirm the company's policy on the issue.
- If the employee has been provided with a list of needed improvements, both the manager and the employee should sign and date it. A copy should be given to the employee and the original placed in the employee's file. The manager should follow up with the employee and give positive feedback if appropriate or review the disciplinary procedure and next steps that will occur.
- The Disciplinary Policy in the Employee Handbook should be written with a clear understanding of the rights of the employee, which can vary by state, and may also be subject to terms of a Labor Agreement.
- Managers are responsible for consistently following the policy and all legal requirements.
- During a meeting that involves a disciplinary action, the employee should always be given an opportunity to give his/her point of view. Give the employee up to a week to write a response. The response should be maintained as part of the employee's record. The employee may request that a manager from a different department review the evaluation documentation and response.
- Reassignment or suspensions may be appropriate in the case of behavioral issues or severe conflict in which the employee has to be removed from a situation immediately, but termination isn't called for. Reassignment refers to retraining (rehabilitative). Suspension means some condition must be met before the suspension is over or the employee is terminated (punitive).
- Decisions to suspend or terminate an employee must be reviewed and approved by a member of the executive staff, or by the Board of Directors if the employee is on the executive staff.

## Appendix A: Hiring Tracker

Funded: Money has been allotted to cover salary, benefits, equipment needs, etc.

Hire Goal: Number of people needed to fill positions.

Hiring Budget: Amount allocated for time commitments, job website fees, recruiting agency fees, job fair fees, etc.

Status: Job Description Complete; Position Posted; Interviewing; Intake Process in Progress; Completed.

Assigned To: Person responsible for ensuring process is completed.

<b>Position</b>	<b>Funded (Y/N)</b>	<b>Hire Goal</b>	<b>Hiring Budget</b>	<b>Status</b>	<b>Assigned To</b>	<b>Comments</b>
Chief Executive Officer		1	\$			
Chief Compliance Officer		1	\$			
Security Manager		1	\$			
Security Staff		5	\$			
Computing Security Manager		1 (part-time)	\$			
Inventory Control Manager		1	\$			
Inventory Control Staff		2	\$			
Record Keeping Manager		1	\$			
Chief Financial Officer		1	\$			
Sales Manager		1	\$			

Facilities Manager		1	\$			
Facilities Staff		2	\$			
Quality Assurance Officer		1	\$			
Quality Assurance Staff		1	\$			
Director of Production		1	\$			
			\$			
			\$			
			\$			
			\$			
<b>Totals</b>			\$			

# Appendix B: Employee Intake Form Checklist

Employee Name: \_\_\_\_\_

Position: \_\_\_\_\_ Position Code: \_\_\_\_\_

Hire Date: \_\_\_\_\_

[Add or delete documents from the table according to the needs of your business and state and local regulations.]

Document	Original in File	Dept. to Receive Copy	Date Copy Sent	Person Responsible	Date Forwarded to Record Keeper
Job Description					
Resume					
Employment Application					
Authorization to Conduct Checks					
Background Check					
Reference Check Documentation					
Offer Letter					
Insurance Acceptance Form		Insurance Co.			
Computing Security					

Agreement*					
W-4		IRS			
Direct Deposit Form		Bank			
Personal Data Form					
Form I-9		IRS			
State Income Tax Form		State Income Tax Dept.			
Key/Key Card User Agreement*					
Driving Agreement (Drivers Only)					

\*Available in the Security Plan

## Appendix C: Training Matrix

<p>Referenced Operating Plan (Column 3)</p> <p>C = Cultivation Plan  D = Dispensary/Retail  E = Employee Handbook  H = Health &amp; Safety Plan  I = Inventory Control Plan  O = Odor Control Plan  Q = Quality Assurance Plan  R = Record Keeping Plan  S = Security Plan  ST = Staffing &amp; Training  W = Waste Management Plan  OT = Other</p>	<p>Key to Employee Types (Columns 4-11)</p> <p>1 All Employees  2 Managers  3 Security Personnel  4 Cultivation Employees  5 Manufacturing Employees  6 Packaging and Labeling Employees  7 Transportation Employees  8 Dispensary/Retail Employees</p>
---	---

Training Topic	Brief Description	Plan	1	2	3	4	5	6	7	8
Effective Training Techniques	Instruction methods, student interaction, documentation and record keeping	ST		X						
Best Practices in Hiring	Writing job descriptions, preparing for an interview, regulations guiding interview questions	ST		X						
Evaluating Employees	Fair evaluations, preparing for a meeting, dealing with unsatisfactory performance	ST		X						
Reg-Federal Regulations	Information from the <a href="#">Wage and Hour Division</a> of the U.S. Department of Labor; OSHA workplace injury documentation	OT	X							
Reg-State Regulations	[Add link to State Regulations]	OT	X							
Reg-Local Regulations	[Add link to Local Regulations]	OT	X							
Reg-Environmental Regulations	[Add link to Environmental Regulations]	OT	X							
Sensitive Records	Definition, storage requirements, access, computing security, retention policy	R, S	X							
Employee Orientation	Policies, pay, benefits, evaluations, suspension, disciplinary procedures	E	X							
Emergency Preparation	Good housekeeping, prevention, engineering controls, finding emergency numbers, practice and drills	S	X							
CPR/1st Aid (Encouraged for all)	Recognizing and responding to a variety of medical situations, when to call for help	S		X	X					
Emer-Armed Robbery	Appropriate response, silent alarm, noticing details, notifying management, contacting law enforcement	S	X							
Emer-Burglary	Avoiding affected areas, notifying management, contacting law enforcement	S	X							
Emer-Other Security Breaches	Types, risks, response procedures, notifying management, contacting emergency responders	S	X							
Emer-Medical Emergencies	Notifying person on staff with CPR/1st Aid training, notifying management, contacting emergency responders	S	X							
Emer-Fire Emergencies	Evacuation procedure, fire extinguishers, notifying management, contacting emergency responders	S	X							
Emer-Evacuation Procedure	Panic alarm, routes of egress, closing doors, safely maintaining secured areas,	S	X							

	designated meeting place, notifying management, contacting emergency responders																		
Emer-Drills and Emergency Exercises	Schedule, expectations, procedures, follow-up training	S	X																
Observation and Incident Reporting	Identifying behavioral cues, vulnerable areas needing extra security, reporting an issue	S	X																
Types of Diversion	Internal, customer, robbery, other potential issues	S	X																
Diversion Prevention	Inventory Control System, limiting access, reducing diversion opportunities, signage	S	X																
Diversion Response Procedures	Incident reporting, audits, notifying regulators and law enforcement	S	X																
Inventory Control System	Purpose, UID labels, system use, control points, system security, regulations, restrictions, notifications	I	X																
Inventory Procedure	Employee responsibilities, changes in disposition, storage of un-inventoried items, receiving, transfers, surveillance, maintaining inventory control if access to the system is lost	I	X																
Certified Scales	Purpose, proper use, calibration, maintenance, logs	I	X																
Inventory Reporting	Accessing reports from the inventory control system, regularly scheduled reports, responding to requests from regulators/law enforcement, system backups	I		X															
Inventory Validation	Regulations, schedule, responsibilities, logging discrepancies, record keeping	I	X																
Inventory Discrepancy Procedure	What qualifies as a discrepancy, audits, logs, reporting, record keeping	I	X																
Storage Access and Procedures	Storage requirements, access controls, surveillance, logs, record keeping	S	X																
Transferring between Control Points	Procedure, inventory control, contamination controls, surveillance	S, I	X																
Receiving Controlled Products	Security at receiving location, security logs, entering received products into inventory control, storage of un-inventoried items	S, I	X																
Entry into the Inventory Control System	Original UID tag assignment, required information, changes in disposition,	I																	

	control points, waste management, transfer off premises													
Quarantine Protocols	When quarantine is required, storage requirements, quarantine, inventory control, removing from quarantine	C	X											
Shutdown Procedures	Responsibilities, tasks,	H	X											
Computing Security	Access, user agreement, preventing malware attacks	S	X											
Incident Command System (ICS) Training	Integrated management of command, operations, planning, logistics, intelligence & investigations, finance and administration - provided by a 3rd party	S			X									
National Incident Management System (NIMS) Training	Integrated management of incidents, hazards, natural disasters, and other impacts - provided by a 3rd party	S			X									
Employee Access to Premises	Badging, access levels, access codes, restricted areas, access termination	S	X											
Visitor Access to Premises	Visitor badging, logs, escorting visitors, record keeping	S		X	X									
Alarm Systems	Regulatory requirements, operation, maintenance, alarmed locations, logs	S		X	X									
Video Surveillance Systems	Equipment, operation, maintenance, procedures, retrieval, retention	S		X	X									
Vault/Safe Access	Physical requirements, access procedures and logs, surveillance	S		X	X									
Closing Procedure	Closing checklist, facility map, checking locks and security equipment, procedure for broken locks or systems	S		X	X									
Safety Committee	Purpose, responsibilities, procedure reviews, soliciting comments from staff, staying informed on issues	H	X											
Tool and Equipment Safety	Training on safe use of tools and machines	H	X	X										
Facility Safety Rules	Evacuation procedures, maintaining safe paths of egress, emergency equipment maintenance	H	X											
Hazard Management	Recognizing hazards, inspections, unsafe work practices, reporting	H	X											
Job Hazard Analysis	Purpose, responsibilities, frequency, process, updating procedures	H	X											

Safety Data Sheets (SDSs)	Globally Harmonized System, purpose, sections, hazard pictograms, hazard communication	H, C	X							
Container Labeling	SDSs, requirements, symbols, signal words, hazard statements	H	X							
Personal Protective Equipment (PPE)	Purpose, proper use, maintaining supplies, SDS information	H	X							
Chemical Spill Response	Incidental vs. non-incidentals spills, PPE, clean up supplies, identifying potential risk to the environment	S or H	X							
Respiratory Protection	Proper equipment and use, respiratory risks, SDSs	H				X	X			
Protecting the Environment by Monitoring Water	Regulations, testing procedures, logs and record keeping, modifying pH	W				X	X			
Ladder Safety	Types of ladders, safe use, 3 points of contact	H	X							
Heat Stress	Risks, identifying symptoms, response procedure	H				X	X			
Poison Control	Sources of poisons, response procedure, posting of Poison Center phone #	H	X							
Safe Lifting	Body positioning, when to ask for help or use equipment, PPE	H	X							
Lockout System	Taking equipment out of service, responsibilities, lockout removal procedure	H								
Fire Extinguisher Use (Encouraged for all)	Locations, PASS, safety precautions	S		X	X					
Electrical Safety (as needed)	Risks, precautionary measures, PPE, advanced equipment lockout	H								
Basic Safety Rules	Housekeeping, obeying signs, training, following procedures, etc.	H	X							
Sanitation	Frequency, process, PPE	H	X							
Logs and Record Keeping	Purpose, types, document retrieval system, retention	R	X							
Equipment	Proper use, maintenance, inspections, repairs, lockout, contamination issues, logs	C, M, P				X	X	X		
Driving Safety (+ All Company Drivers)	Awareness, space between vehicles, driving in heavy traffic and inclement weather, what to do when an accident occurs	T								X
Product Testing		Q				X	X			

Testing Sample Preparation	Purpose, selecting samples, record keeping	Q				X	X				
Bloodborne Pathogens	Response procedure, Hepatitis B	H	X								
Storage Requirements (temp, humidity, etc.)	Environmental conditions of finished flower and associated products and materials	C		X		X	X	X	X	X	X
Processing	Processing stages, environmental conditions	C				X					
Methods of Cultivation	Plant stages, seeds vs. cloning, lighting requirements	C				X					
Plant Inspection	Daily checklist, logging plant and environmental conditions, pest management	C, Q				X					
Tracking Lots and Plants	Managing seed and cutting lots, applying UIDs, cross referencing to cultivation records	C				X					
Media	Media types and watering methods	C				X					
Cultivation Equipment	Types and purpose	C				X					
Fertilizers	Procedure for administering nutrients	C				X					
Seed Propagation		C				X					
Clone Propagation	Required attire, tool preparation, procedure, monitoring	C				X					
Vegetative Growth and Flowering	Definitions, light requirements, length	C				X					
Harvesting	Process description, cautions	C				X					
Job-specific Risks and Emergencies	Specific types of accidents that may occur, use of job risk analysis, managing changes in workflow or processes, updating procedures	M	X								
Good Manufacturing Practices	Risk analysis and management, quality assurance, safety, existing guidelines	M					X	X			
Working with Solvents	SDSs, potential health hazards, evaluating exposure, engineering controls, PPE, containers and labeling, reuse	M					X				
Extraction Methods	Types of extracts, chemistry, working with heating elements, working with batches, inventory control, scales and other equipment, workflow, safety, sanitation, storage	M					X				

Mixing	Working with batches, inventory control, ingredients, scales and mixing equipment, safety, sanitation, storage	M					X			
Infusion Methods	Working with heating elements, working with batches, inventory control, ingredients, scales and infusion equipment, safety, sanitation, storage	M					X			
In-process Sampling and Controls	Selecting a sample, preparing a sample, homogenization, workflow, inventory control, procedures for failed samples, record keeping	M					X			
Food/Ingredient Safety and Storage	Perishables, variations in shelf life, effects of heat, light, and oxygen	M					X	X		
Reuse of Materials	Working with batches, inventory control	M					X			
Equipment Inspection	Risks of working with equipment, maintenance procedures, maintenance and repair logs, sanitation, record keeping	CMP				X	X	X		
Contamination Control	Routes of contamination, sanitation, PPE and other engineering controls,	CMPD				X	X	X		X
Expirations/Time Limits	Effects of heat, light, and oxygen, determining expiration dates, managing expired products, inventory control	Q		X		X	X	X		X
Batch Management	Understanding batches, when/if batches can be mixed, inventory control issues, logs and record keeping	I				X	X			
UID Issuance and Control	Procuring and secure storage of UID tags	I		X		X	X	X		
Label Design	Avoiding appealing to children, label requirements, proofing	P						X		
Packaging and Labeling Procedures	Ensuring accurate and complete label information in accordance with state law	Q						X		
Quality Control	Responsibilities, sampling and testing, adverse events and recalls, changes to procedures	Q	X							
Interacting with Regulators		S		X	X					
Interacting with Law Enforcement		S		X	X					
Point of Sale System	Software, security, integration into inventory control system, scales	D								X
Returns, Complaints, Adverse Events, and Recalls	Who to notify, response procedures, logs and record keeping	Q		X						X
Sales Techniques	Interacting with and educating customers	D								X



Odor Control	Definitions, mitigation, procedures, physical measures and equipment, system maintenance	O					X	X			
Workplace Violence Policy	Expectations, reporting new or potential incidents, disciplinary action	S	X								

## Appendix D: Notice of Needed Improvements

### Employee Information

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Employee ID: \_\_\_\_\_

Position: \_\_\_\_\_

Manager: \_\_\_\_\_

### Warning Status

\_\_\_\_ First Warning

\_\_\_\_ Second Warning

\_\_\_\_ Final Warning

### Area of Needed Improvement

\_\_\_\_ Lateness/Leaving Early

\_\_\_\_ Low Productivity

\_\_\_\_ Skipped Shift

\_\_\_\_ Procedure Violation

\_\_\_\_ Inappropriate Behavior

\_\_\_\_ Other: \_\_\_\_\_

Description of Issue, including date and time of a specific incident if applicable:

Needed Improvements:

### Acknowledgements

By signing this form, I verify that I understand of the types of improvements needed as specified above. I also understand that making these improvements is necessary to avoid possible disciplinary action. If I do not agree with the information documented in this form, I may write a reply and have it placed in my file attached to this form and have the information reviewed by a second evaluator.

Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Evaluator Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Witness if employee does not sign: \_\_\_\_\_ Date: \_\_\_\_\_

# Appendix E: Personal Vehicle Driving Agreement

Employees may be requested to operate their owned, leased, or rented vehicle to conduct Jolly Green Inc business.

Jolly Green Inc does not assume any liability for bodily injuries or property damage the vehicle owner, driver, or passengers may become personally obligated to pay arising out of such operation. When operating your personal vehicle on behalf of [Company], the following policies must be followed:

- The driver must be determined to meet all Jolly Green Inc driver qualification standards described in this agreement before being permitted to operate a personal vehicle on Jolly Green Inc business. Failure to continue to meet these qualification standards will result in revocation of the Employee’s driving responsibilities.
- The vehicle being operated must have a valid registration, and proof of registration must be kept in the vehicle. Employee drivers must possess a current and valid driver’s license on their person at all times while operating the vehicle.
- Automobile insurance meeting the legal minimum requirements of the vehicle’s state of registry must be maintained on the vehicle being used, and a valid insurance identification card must be kept in the vehicle. Proof of such insurance must be provided to Jolly Green Inc when the driver is initially added to Jolly Green Inc’s driver list and whenever requested thereafter.

- Jolly Green Inc does not specify and assumes no responsibility for any other coverage Employees carry on the vehicles used, but encourages those operating vehicles on behalf of Jolly Green Inc on a regular basis to maintain limits of at least \$100,000 each person/\$200,000 each occurrence for bodily injury and \$100,000 property damage, or a combined single liability (CSL) limit of \$300,000, plus uninsured motorist (UM) and underinsured motorist (UIM) coverage.
- Vehicles should be maintained so as to permit reliable and safe operation. The vehicle owner/driver is responsible for all maintenance and associated costs.
- Seatbelts and other required safety restraints must be used at all times.
- All traffic laws must be obeyed. Jolly Green Inc is not responsible for and will not reimburse Employees for any moving or non-moving violations received as a result of operating a vehicle on behalf of the organization.
- Vehicles may not be operated while the driver is under the influence of alcohol or any other controlled substance, including any prescription or over-the-counter medications that may affect driving ability.

## Reporting Requirements

In order to ensure that drivers maintain compliance with the company driver qualification standard, drivers are required to report all moving violations and at-fault accidents, or drivers' license status changes (suspension, revocation, new license, etc.) to a supervisor within 72 hours of conviction, determination, or status change effective date.

### Accidents Involving Use of Personal Vehicles

If you are involved in an accident in your personal or rented vehicle while traveling on business, a claim should be filed with your personal automobile insurance company, as that policy will provide primary coverage. However, the accident should still be reported to your supervisor.

### Violations of Policy

Failure to comply with any of these policies may result in suspension of driving responsibilities on behalf of Jolly Green Inc.

I have reviewed and received a copy of this Jolly Green Inc Vehicle and Driving Agreement. I agree to abide by all policies and procedures to ensure safety of myself and the general public, when driving to conduct business on behalf of Jolly Green Inc.

(Print your first and last name)

---

Signature

---

Date

# Staffing and Training Plan

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# Introduction

The information in this plan is designed to provide guidance for managers and supervisors related to the responsibilities of staffing and hiring. This plan is designed to support the development of human capital and staff capabilities in order to maximize the efficiency and effectiveness of the organization. It will be reviewed and updated six months after the company starts operations and annually thereafter to adapt to changes in the needs of the company or trends in the industry.

Jolly Green Inc is committed to following all local, state and federal laws related to labor and employment. Jolly Green Inc will adhere to requirements as described by:

- The Wage and Hour Division of the U.S. Department of Labor
- The MA. State labor regulator of labor.

Jolly Green Inc 's employment practices are based on job qualifications, performance, and conduct without regard to race, color, religion, national origin, age, sex, marital status, height, weight, disability, genetic information, or any other legally protected status.

The Jolly Green Inc provides reasonable accommodation to qualified individuals with disabilities in accordance with the law. Any employee with a need for accommodation due to a disability will be encouraged to notify his/her supervisor as soon as possible.

It is in our best interest to hire individuals according to planned needs. The staffing portion of this plan is designed to estimate the positions that will be necessary to efficiently manage the business and specify the job descriptions and expected qualifications for each.

## General Staffing Policies

Jolly Green Inc will use best practices to staff positions and retain employees. The following policies will be carried out to ensure efficient operations:

- Include managers in the hiring process for positions they will be responsible for supervising.

- Ensure that an adequate number of employees are hired and scheduled for each shift to reduce stress caused by continuous overwork.
- When appropriate, employees will be cross trained such that they may provide assistance to another department that temporarily becomes busier than normal.
- Ensure that backup support is available through a system of on-call or part-time workers in case scheduled staff cannot come in for a shift.
- Managers will maintain a combined record of additional educational qualifications and skills that employees have such that new opportunities may be filled from within the company when possible.
- Utilize a Hiring Tracker (Appendix A) to manage the status of hiring employees.
- Utilize a variety of recruiting resources, including online career websites, recruiting agencies, job fairs, placement departments at training agencies, etc.
- Utilize an Intake Checklist (Appendix B) to ensure all documentation is properly collected and activities associated with hiring an employee are completed.
- Provide an environment in which employees feel respected and appreciated for quality work.
- An Employee Handbook will be provided to all staff as part of the training process specifying expected behaviors, company policies, and a disciplinary procedure.
- Managers will be trained in best hiring practices, effective training techniques, and appropriate evaluation methods, which are further detailed in sections below.
- Staffing plan records: Jolly Green Inc shall maintain a staffing plan and staffing records in compliance with 935 CMR 500.105(9).
- Jolly Green Inc is an alcohol, smoke, and drug-free workplace.
- Jolly Green Inc will provide a plan describing how confidential information will be kept and maintained.
- Jolly Green Inc has a policy for the immediate dismissal of any marijuana establishment agent who has:
  1. Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
  2. Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or
  3. 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.

# Staffing Requirements

The following table specifies the essential staffing positions that need to be filled and anticipated associated costs related to their functions.

Primary Employee	Man-hours/Week	Function	Relative Importance of Function	Estimated Cost/Mo.*	Notes
Chief Executive Officer	N/A	Overall Business Management	Critical		
Chief Compliance Officer	40	Compliance with Regulations and Procedures	Critical		
Chief Financial Officer	40	Finances and Accounting	Support		
Security Manager	40	Security Management	Critical		
Computing Security Officer	20	Computer Security	Support		
Inventory Control Manager	40	Inventory Control Management	Critical		
Facilities Manager	40	Facility Management	Critical		
Facilities Asst Manager/Staff	40	Facility Management Support	Support		
Quality Assurance Officer	40	Quality Assurance	Support		

Record Keeping Manager	40	Record Keeping	Support		
Security Staff	196 (2 during all business hours)	Security Operations	Critical		
Inventory Control Staff	40	Inventory Control Operations	Critical		
Sales Manager	40	Sales	Critical		
Facilities Staff	40	Facility Operations	Support		
Cultivation/ Mfg. Manager	40	Cultivation/ Mfg. Operations	Critical		
Cultivation/ Mfg. Staff	168	Cultivation/ Mfg. Support	Critical		

\*Estimated Cost refers to monthly salary/benefits, payroll taxes and other insurances.

## Organizational Chart

Board of Directors  
 Chief Executive Officer  
 Chief Compliance Officer  
 Inventory Control Manager  
 Inventory Control Staff  
 Computing Security Manager  
 Security Manager  
 Security Staff  
 Record Keeping Manager  
 Quality Assurance Officer  
 Quality Assurance Staff

Facilities Manager

Facilities/Janitorial Staff

Chief Financial Officer

Sales Manager

Sales Staff

Director of Production Cultivation

Cultivation/Manufacturing Manager

Cultivation/Manufacturing Staff

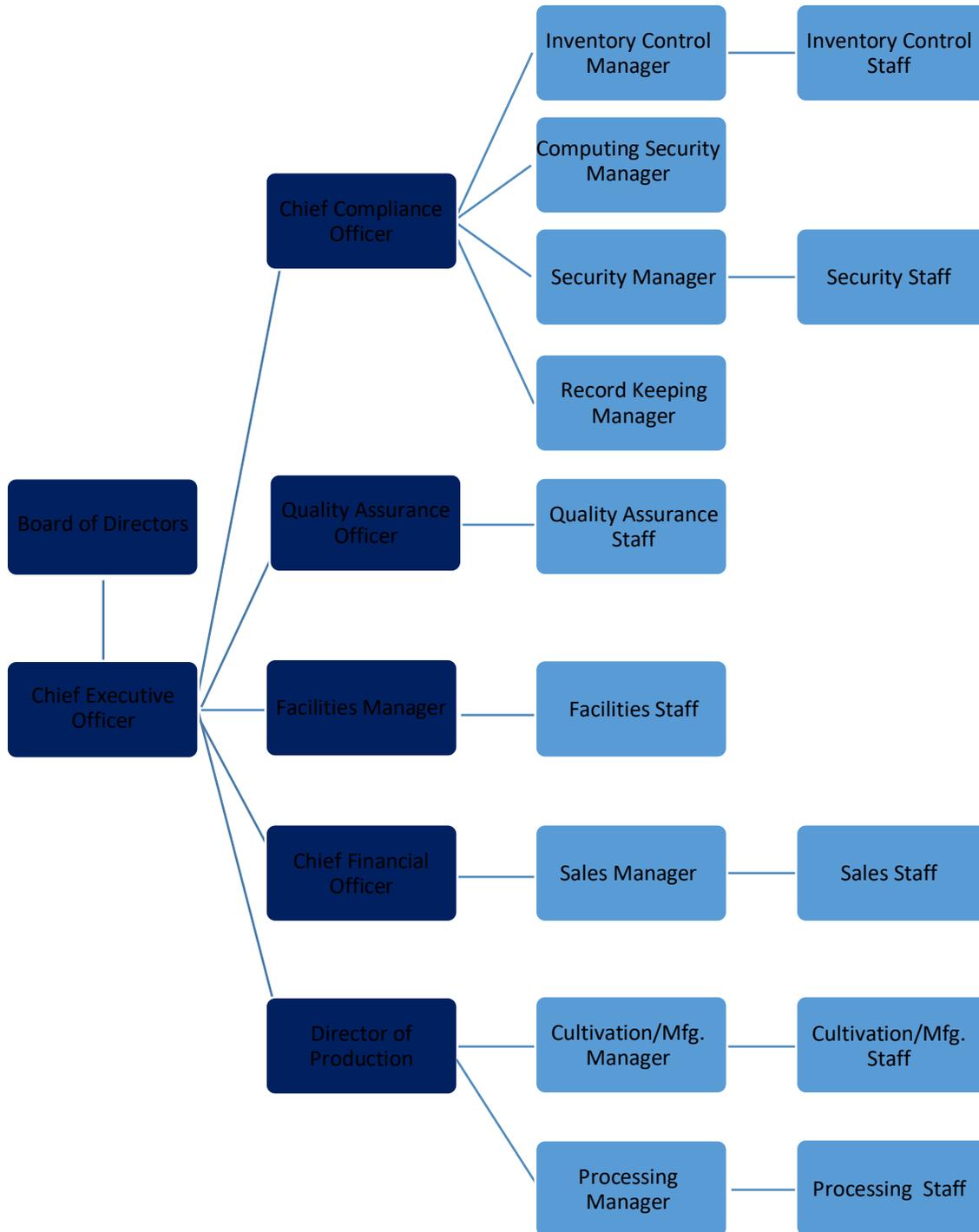
IPM/Pest Control Manager

Propagation Manager

Trimming/Processing Manager

Processing Staff

# Organizational Chart



# Job Descriptions

## Chief Executive Officer

The Chief Executive Officer (CEO) is the primary representative of the company to regulators, law enforcement, and the public and provides direction and leadership in the company's mission, vision, values, and strategy. The CEO implements and manages the strategic services, goals and objectives of the organization. It is also an important role of the CEO to set an example of professionalism and respect for others in all areas of operations.

Responsibilities include, but are not limited to:

- Operate the organization according to direction provided by the Board of Directors.
- Facilitate an open communication system to support operations and administration of the Board by advising and informing its members.
- Report progress and statistical performance measures to the Board on a quarterly basis.
- Oversee all operations and business activities to ensure they produce the desired results based on goals and timelines.
- Hire qualified personnel for Executive Staff positions.
- Build and maintain a positive working relationship with Executive Staff and be open to suggestions for improvements from employees.
- Enforce adherence to legal guidelines and standard operating procedures to maintain the company's legal status and business ethics.
- Implement the Business Plan and make suggestions for its improvement.
- Set goals for performance and growth.
- Review financial and other reports to track business performance and devise methods for improvements.
- Build relations with key partners and stakeholders and act as a point of contact for investors.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Analyze problematic situations and occurrences and provide solutions to ensure company success and growth.
- Maintain a deep knowledge of the cannabis markets and industry
- Stay up to date on management-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations,

participating in conferences, and/or other means of networking with and learning from other management experts.

#### Requirements:

- BA in business required
- 2 years of experience working in the pharmaceutical or cannabis field desired
- In-depth knowledge of corporate governance and general management best practices
- Ability to demonstrate an understanding of business functions, including finances, HR, sales, and marketing
- Strategic planning and business development experience
- Excellent communication skills
- Ability to pass a background check

## Chief Compliance Officer

The Chief Compliance Officer (CCO) reports to the CEO and is responsible for implementing the Security Plan, the Inventory Control Plan, and the Record Keeping Plan by managing designees who will be responsible for a subset of tasks.

Responsibilities include, but are not limited to:

- Manage security compliance according to state guidelines and the Security Plan.
- Have a sufficient understanding of computing security to the extent that he or she is able to select a qualified individual or contractor to implement the computing security component of the Security Plan.
- Manage a budget covering compliance-related resources.
- Work with local and state government agencies on environmental issues and specific licensing requirements.
- Serve as the company's secondary expert (after the Inventory Control Manager) in the use of the Inventory Control System and ensure compliance with all related regulations.
- Monitor and interpret the regularly changing rules of state cannabis commerce and communicate with staff accordingly.
- Define the structure of a record management system, including a document retrieval system, in compliance with the Record Keeping Plan.
- Oversee the training compliance system for all employees.
- Work closely with the Quality Assurance Officer to monitor and improve the implementation of standard operating procedures.

- Oversee the maintenance of records such that requests for information from regulating authorities or law enforcement will be met by required deadlines.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Stay up to date on compliance-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other compliance experts.

Requirements:

- Ability to demonstrate an extensive knowledge of state and local cannabis compliance laws
- Proficiency or willingness to rapidly undertake extensive training in the use of the state’s selected inventory tracking system
- 3 years of experience in management or HR in a related industry
- Familiarity with team building and training employees on compliance issue
- Motivated self-starter and proficient at multi-tasking
- Aptitude in solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

## **Inventory Control Manager**

Under the direction of the CCO, the Inventory Control Manager (ICM) will be responsible for carrying out tasks specified in the Inventory Control Plan. In consultation with the CCO and the QAO, the ICM will recommend changes and amendments to the Inventory Control Plan on an annual basis.

Responsibilities include, but are not limited to:

- Serve as the company expert on the state-required inventory control system (ICS) and be aware of updates and compliance requirements related to the system
- Act as the point of contact with the system vendor
- Train and manage at least one other employee to have a sufficient knowledge in the use of the ICS to carry out upper level functions in the absence of the ICM and the CCO
- Train incoming employees on the use of the ICS based on the requirements of his or her position

- Foster a spirit of cooperation, respect and professionalism among employees and other managers
- Maintain ICS training records and all other documentation and logs per regulations and procedures
- Keep related equipment in good working condition and secured when not in use
- Develop a method to collect inventory information in the event of loss of access to the electronic inventory system
- Carry out inventory verifications and report discrepancies
- Resolve system notifications within a specified time period
- Run reports from the ICS as requested

Requirements:

- 2-3 years of experience in a management position in a related industry
- 2 years of experience working with a computer-based inventory system
- Experience in the cannabis industry preferred
- Willingness to quickly learn regulations related to inventory control and participate in extensive training to develop an expertise in the ICS
- Ability to pass a background check

## Record Keeping Manager

The Record Keeping Manager (RKM) reports to the CCO and is responsible for complying with record-related regulations and implementing tasks in the Record Keeping Plan. Records are maintained to provide operational information to company managers, advisors, and owners for decision-making purposes, and to provide information in case of insurance, criminal, or regulating authority investigations.

Responsibilities include, but are not limited to:

- Manage records within a digital, indexed record management software such that materials may be quickly retrieved in the event of a request from regulators or law enforcement officials
- Work with the CCO to improve indexing or tagging categories to apply to each document
- Scan paper records into the record management system on a daily or weekly basis
- Delete or discard digital and paper records according to the company's record retention policy

- Work with the Computing Security Manager to ensure records are stored securely, backed up, and easily accessible

Requirements:

- Must be at least 21 years of age
- Must have at least 2-3 years of administrative or record keeping experience, preferably in a legal, tax or other highly regulated industry
- Experienced in using standard computer programs and able to learn new softwares within a relatively brief time period
- Willing to rapidly become familiar with regulations and record keeping standards
- Able to pass a background check

## Security Manager

Under the direction of the CCO, the Security Manager (SM) is responsible for carrying out the bulk of the responsibilities identified in the Security Plan and managing Security Officers.

Responsibilities include, but are not limited to:

- Implement and enforce safety regulations and policies.
- Ensure the protection of people, property, and assets.
- Reduce risks, respond to incidents, and limit liability in all areas of financial, physical, and personal risk.
- Act as liaison to the local Police Department (PD).
- Schedule all security services and officers.
- Manage a budget covering security resources and employees.
- Ensure all security equipment and systems are operated and maintained according to manuals, standard security practices, and the Security Plan.
- Administer the access control program, including the enrollment of personnel in the company's access control system.
- Compile reports as required by the CCO.
- Utilize all security systems to discover security breaches and identify compliance issues.
- Train personnel according to established procedures and conduct regular security meetings to discuss problems and future plans.
- Ensure the maintenance of training records and security logs.
- Manage all visitor access to the facility.
- Act as liaison to all departments on security measures, procedures, and needs.

- If the company also carries out transportation responsibilities Coordinate the security of transportation activities, including the planning of delivery routes to ensure the safety and security of the delivered goods and employees.
- Conduct security evaluations to ensure constant improvement and compliance.
- Ensure the reporting and documentation of all incidents and provide initial information for investigations to the CCO.
- Ensure that all records are forwarded properly according to the Record Keeping Plan.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Stay up to date on security-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other security experts.

Requirements:

- 5-10 Years Security Management Experience
- Minimum of HS Diploma or equivalent, college degree preferred
- Board certified in security management by ASIS International as a CPP highly preferred
- Must be willing and able to work a flexible schedule based on the demands of the business
- Aptitude for solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

## **Security Staff, Unarmed**

Security Staff report to the Security Manager and assist in maintaining the safety and security of the staff, products, and the facility.

Responsibilities include, but are not limited to:

- Conduct periodic inspection of premises to protect against fire, theft, vandalism, and illegal activity.
- Maintain required records and logs.
- Prevent access to any unauthorized persons within the registered premises
- Assist any staff with security access issues.
- Monitor any suspicious behavior by guests, visitors, or personnel.

- Ensure compliance with state and local regulations and company procedures.
- Prepare reports as requested by the Security Manager.

Requirements:

- At least 21 years of age
- A current security guard license or the ability to receive a license, including a background check
- Prior security, law enforcement or military experience preferred

## Computing Security Manager

Under the direction of the CCO, the Computing Security Manager (CSM) will manage the security related to data and technology and will be responsible for ensuring compliance with the Computing Security portion of the Security Plan.

Responsibilities include, but are not limited to:

- Interpret and establish security technologies and create an information security framework and architecture that protects sensitive data from threats.
- Monitor computing operations and infrastructure by reviewing alerts and logs on a daily basis.
- Ensure that security tools and technology are maintained and updated.
- Ensure that security vendors are appropriately vetted, meet contractual agreements and comply with regulations and policies.
- Identify patterns in which employees are failing to comply with procedures and recommend additional training or procedure updates to the CCO.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Manage a budget related to computing resources.
- Evaluate new technologies and make recommendations for their use to the CCO based on industry standards and company needs.
- Audit internal security systems and policies frequently to identify areas needing improvement.
- Develop and maintain a detailed security incident response program.
- Regularly report to the CCO on the status of computing security.
- Stay up to date on computing security-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations,

participating in conferences, and/or other means of networking with and learning from other cybersecurity experts.

#### Requirements:

- 6-10 years of Computing Security Management experience or a bachelor's degree in computer science, programming or a similar field from an accredited institution and 4 or more years of experience
- Ability to demonstrate an expertise and knowledge of databases, networks, hardware, firewalls and encryption
- Aptitude in solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

## Quality Assurance Officer

The Quality Assurance Officer (QAO) reports to the CEO and will be involved in decision making related to changes to policies and processes. Guided by the Quality Assurance Plan, he or she will facilitate improvements to plans, products, and systems within the company in response to employee, customer, and regulating authority feedback.

#### Responsibilities include, but are not limited to:

- Work closely with the Chief Compliance Officer and other managers to monitor and improve Standard Operating Procedures.
- In departments that utilize mechanical equipment, work with managers and employees to develop step-by-step procedures and maintenance logs for the use, sanitation and inspection of each item.
- Assist managers with employee training by preparing instructional materials, hands-on exercises and evaluation tools.
- Complement training conducted by other managers by providing in-person training on issues related directly to quality control.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Monitor the introduction of new systems, equipment, and products, such that potential quality issues may be identified prior to the implementation of new processes.
- Maintain an awareness of regulations related to SOPs and product quality control.

- Maintain an updated source for all current policy and procedure documents in both paper and digital format and ensure easy access to employees at all levels.
- Work with department managers to conduct job risk analyses and make training and procedure recommendations based on the results.
- Perform a periodic analysis of reports and production data to identify problematic patterns and recommend updates or changes to policies and procedures.
- Assist with regulatory inspections.
- Implement procedures related to adverse events and recalls according to the Quality Assurance Plan.
- Stay up to date on quality-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other quality assurance experts.

#### Requirements:

- 3 - 5 years of experience in Quality Assurance in a related field or a Bachelor's degree in Quality Assurance from an accredited institution and 1 - 2 years of experience
- Experience in employee training
- Aptitude in solving problems independently
- Strong verbal and written communications
- Ability to think critically and logically in applying systems and processes to meeting company goals
- Ability to pass a background check

## Facilities Manager

The Facilities Manager (FM) reports to the CEO and is responsible for building maintenance, environmental controls, operations and safety, janitorial services, sanitation, storage and maintenance of chemicals, and non-cannabis/marijuana waste management.

Responsibilities include, but are not limited to:

- Maintain lighting, HVAC and mechanical systems in excellent working condition.
- Coordinate with the Security Manager to maintain the function and safety of the facility's hardware and infrastructure.
- Manage a budget associated with facilities functions.
- Hire, manage and train facilities staff.

- Create and implement task-specific SOPs and carry out job risk analyses with the assistance of the Quality Assurance Officer.
- Be aware of federal, state and local regulations related to cannabis/marijuana business premises requirements.
- Be familiar with local building code and permit regulations.
- Develop a maintenance and inspection schedule for all building and infrastructure systems.
- Conduct or oversee the routine maintenance and inspection of environmental and other major systems critical to the operation of the organization.
- Develop and maintain logs and checklists to simplify maintenance and inspection activities.
- Schedule and facilitate required inspections by outside organizations.
- Determine which types of work can be handled by company personnel and under what circumstances an outside contractor must be called in.
- Serve as the lead responder to critical equipment malfunctions, including the maintenance of a list of critical equipment and phone numbers to call in case of breakdowns.
- Maintain an on-site inventory of selected equipment parts to facilitate rapid repairs in the event of a malfunction.
- Work with the Security Manager to support the maintenance of security systems.
- Manage chemicals, non-cannabis/marijuana waste and other refuse.
- Train facilities employees in the proper procedures for handling and disposing of chemicals, including the [Globally Harmonized System](#) of Classification and Labeling of Chemicals (GHS) and the use of Safety Data Sheets (SDSs).
- Keep records of training for each training module related to chemicals and non-cannabis waste management for every facilities employee, including the date training occurred, type of training, the signature of the employee upon completion of training, the signature of an authorized person who can verify completion of training, and the date retraining is due
- Forward all records and logs to the Record Keeping Manager
- Become familiar with all company Standard Operating Procedures to identify areas in which the Facilities Department may support other business activities.

#### Requirements:

- At least 5-10 years of building/facilities management experience, including repairs to mechanical and structural components
- Experience with electrical, HVAC, lighting, plumbing, ventilation and other infrastructure component installation and adjustments
- Experience working with outside vendors and contractors

- Excellent organizational, planning and problem-solving/troubleshooting skills
- Must be able to work independently with limited supervision

## Chief Financial Officer

The Chief Financial Officer (CFO) will be responsible for finances and accounting, as well as overseeing activities carried out by the Sales Manager.

Responsibilities include, but are not limited to:

- Perform the day-to-day, monthly and year-end operations of the Accounting/ Finance Department.
- Assist the CEO on all strategic and tactical matters as they relate to budget management, cost–benefit analysis, forecasting needs and the securing of new funding.
- Manage the sales operation of the company through the supervision of a Sales Manager.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Create financial reports such as P&L, Balance Sheet, Cash Flow and budget performance.
- Present and interpret financial data for the Executive Staff and the Board of Directors.
- Ensure compliance with applicable standards, rules, regulations, and systems of internal control.
- Perform the processing and recording of accounts payable transactions.
- Ensure that all invoices and staff reimbursements are paid accurately and in accordance with standard practices.
- Manage the processing of cash receipts, recording of revenue and receivable.
- Ensure that revenues and receivables are correct and maintained.
- Prepare and record taxes for the company (Sales, Payroll, Local) and work with the CPA on Corporate taxes.
- Perform the processing of functional and benefits expense allocations, monthly accruals, amortization of prepaid expenses, fixed assets depreciation and recording of adjusting and reclassification journal entries, if necessary.
- Perform general accounts analysis and reconciliations, including bank statements, fixed assets, employer’s benefit costs, accruals and prepaid expenses
- In cooperation with the CCO and the ICM, ensure that the Point-of-Sale System is fully integrated into the Inventory Control System and be responsible for its accuracy and maintenance.

- Stay up to date on finance-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other finance/accounting experts.

Requirements:

- At least 5 years of experience in accounting for a similar business size and a Bachelor's Degree in Business or Accounting, CPA preferred
- If less than 3 years of experience in sales, willingness to attend training related to managing sales personnel
- Expert knowledge in Quick Books
- Strong organizational skills and ability to prioritize workload in order to meet tight deadlines in a fast-paced and dynamic work environment
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management
- Excellent analytical and problem-solving skills
- Proficient in Microsoft Office (Word, PowerPoint, Excel)
- Highly detail oriented and proficient in record keeping
- Team player and able to collaborate with others in the organization
- Ability to pass a background check

## Sales Manager

The Sales Manager reports to the CFO and will serve as the lead in developing sales and marketing strategies that will result in success in a highly competitive industry. A candidate having existing contacts with established businesses will be given preference.

Responsibilities include, but are not limited to:

- Work with the executive team to develop a sales/marketing strategy and identify potential customers.
- Maintain vendor and client databases and relationships.
- Attend and exhibit at trade shows.
- Develop new business relationships in line with the company's strategy.
- Gather related sales data, conduct analyses, and refine the strategy as needed.
- Have a detailed understanding of inventory and prices.
- Guide the marketing strategy based on vendor and consumer feedback.

## Requirements

- At least 21 years of age
- A minimum of 3 to 5 years of sales experience in a related industry, previous experience in the cannabis/marijuana industry preferred
- Strong background in developing business relationships
- Articulate, with effective verbal and written communication skills
- Proficiency with sales management and presentation tools
- Ability to pass a background check

## Director of Production

The Director of Production reports to the CEO and is responsible for the overall management of cultivation and manufacturing activities.

Responsibilities include, but are not limited to:

- Manage the budgets, overall supply chains, and operations of the cultivation and manufacturing activities.
- Implement the Cultivation and Manufacturing Plans, primarily through the hiring and supervision of the Cultivation and Manufacturing Managers.
- Ensure product safety and work with other department heads to comply with regulations and required security, inventory control, and other procedures.
- Prepare reports on production, expenses, product quality, safety, etc.
- Analyze report results and prepare recommendations for improvements.
- Present data to the other Executive Staff and to the Board of Directors as requested
- Maintain inventory levels to ensure timely delivery of products to customers.
- Research new technologies that may improve efficiency, safety, and productivity and make recommendations to Executive Staff.
- Regularly meet with Managers and the Quality Assurance Officer to discuss potential new technological ideas, improve procedures and ensure compliance with regulations.
- Foster a spirit of cooperation, respect and professionalism among employees and other executives.
- Stay up to date on cultivation/manufacturing-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related

organizations, participating in conferences, and/or other means of networking with and learning from other experts.

## Requirements

- A minimum of 3-5 years of experience in cultivation or manufacturing management and leadership experience, including agricultural, pharmaceutical, or herbal medicine industries; Bachelor's degree in a manufacturing or agricultural production field preferred
- A basic understanding of the processes involved in both cultivation and manufacturing; knowledge of the cannabis/marijuana industry preferred
- Strategic planning and business development experience
- Ability to resolve problems with and between employees in a respectful and fair manner, based on sound human resources principles
- Ability to demonstrate experience in improving production and efficiency
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management
- Ability to quickly become familiar with all regulations and Standard Operating Procedures and monitor regulatory updates

## Cultivation Manager/IPM Manager

The Cultivation Manager reports to the Director of Production and manages a team of cultivation staff members in the production of high-quality cannabis/marijuana plants and plant materials.

Responsibilities include, but are not limited to:

- Manage a team that handles all aspects of daily cultivation activities in a large-scale indoor grow facility.
- Outline specific roles and responsibilities for plant technicians and work with management to build a team.
- Create and implement task-specific SOPs and carry out job risk analyses with the assistance of the Quality Assurance Officer.
- Provide weekly updates to the Director of Production to consistently re-address grow tactics.
- Maintain indoor plant growing protocols, develop and test nutrient regimens, and strive to improve planting techniques and yields.

- Execute the pest management program including elimination of all types of mold, powdery mildew, spider mites, root aphids, fungus gnats, etc.
- Work with the Inventory Control Manager to perform all cultivation tracking with the inventory control system in compliance with rules and regulations.
- Manage plant scheduling to accurately project all growing requirements on a daily, weekly, and monthly basis to maximize high-quality yield.
- Schedule, manage and oversee cloning processes, achieving a minimum 90% success rate.
- Manage the maintenance of irrigation, climate control systems, cleaning, sanitation, hazard action plans and alert management if there are issues.
- Train employees in task-related processes and health and safety issues.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Ensure that logs and other records are forwarded to the Record Keeping Manager.
- Work closely with the Quality Assurance Officer to monitor and improve the implementation of standard operating procedures.
- Maintain records such that requests for information from regulating authorities or law enforcement can be met by required deadlines.

#### Requirements:

- Completion of a course in Plant Pathology from an accredited institution with the equivalent of a B or better as a final grade
- A minimum of 3-5 years of experience managing a marijuana cultivation facility
- Experience developing task-specific procedures and training employees
- Mastery of all grow mediums and irrigation methods
- Experienced in cloning, transplanting, defoliation, super cropping, topping, flushing, pest management, harvesting, drying, trimming, waste disposal and inventory management
- Knowledge of large-scale commercial plan plant growing including crop rotation management, nutrient requirements, mediums, light requirements, and environmental controls
- Knowledge of plant diseases, pests, and nutrient deficiencies and toxicity
- Advanced knowledge of the cannabis plant and genetics
- Knowledge of industry best-practices and current on new techniques with respect to the nutrient needs of individual strains and high yield recipes
- Strong attention to detail, ability to communicate clearly
- Ability to pass a background check

## Training Policies

The Executive Staff are responsible for ensuring that all training required by procedures and regulations is provided at no cost to the employee. Per 935 CMR 500.105(2) and 935 CMR 500.101(1)(C)(8)

The Quality Assurance Manager will also evaluate and identify areas where specified training is lacking, create or advise on providing the new training as needed, and assist in modifying procedures to thereafter require the new training.

The Chief Compliance Officer will designate an employee to keep track of training completion and the frequency of repeated training, as well as manage a reminder system to keep employees informed of due dates of future training.

All employees will have records of training held on site in the administrative offices and archived in the document retrieval system.

The Training Matrix in Appendix C provides a list of training topics and the related operating plan that may be consulted for further details.

## Manager Training

Jolly Green Inc will provide the training to managers in the areas of hiring, training, and performing evaluations. Managers are encouraged to suggest additional training topics as needs arise.

### Best Practices in Hiring

In order to ensure a hiring strategy that is consistent, in compliance with legal requirements, and that attracts and keeps high quality employees, managers will be trained in the following:

- The importance of evaluating internal and external business trends to estimate the number and types of employees needed. Internal factors include changes in work shifts, workforce demographics, and downsizing. External factors include a merger or acquisition, changes in legislation, etc.

- How to write and update job descriptions, including required qualifications, particularly noting whether the position requires skills that have already been learned or if on-the-job training is appropriate. Preparation should include asking the following the questions:
  - (a) what skills, knowledge, and abilities are required for the job;
  - (b) what are some of the characteristics of the people who succeed or fail in the job;
  - (c) what qualifications are needed for the job; and
  - (d) how does the job relate to others.
- To avoid illegal screening of applicants with disabilities, list job duties describing only what the necessary tasks are, rather than how the tasks are normally performed.
- The need to develop an interview guideline to ensure a similar process is used during all interviews for the same position. The guideline should include standardized questions given in a specific order, a relatively controlled length of time for the interview, and a standardized evaluation form to be filled out by the interviewer.
- Take into account that people may feel anxiety during a formal interview, which may misrepresent their true potential.
- Clearly communicate to potential employees the salary, work schedule, and potential future opportunities within the company to reduce misunderstandings after hiring.
- Ask appropriate questions during the interview process to match a potential employee's likes and dislikes with a position that fits their personal preferences.
- Limitations on what an interviewer may ask related to age, disabilities, etc., to be in compliance with regulations.
- If any pre-employment testing is utilized, only testing instruments may be used that are clear and understandable, have been demonstrated as valid for the skills being assessed, and are appropriate for the target population.
- References must be checked and adequately documented.
- All documentation is forwarded to the Record Keeping Manager.

## Effective Training Techniques

- Provide adequate training to employees prior to their first day of work.
- Utilize a variety of instruction methods, such as writing on a board, digital presentations, viewing videos, storytelling, etc.
- Involve students interactively through the use of quizzes, small group activities, case studies, Q&A sessions, question cards, role playing, physical demonstrations, identifying problems in a scene, etc.
- Where appropriate, hands on training is preferred to other methods.
- Upon hiring new employees after the business has started operations, match experienced personnel with beginners to provide support when questions or emergencies arise.
- Each in-person training session must have a sign-in sheet that is used to document the employee's fulfillment of a training requirement. The sheet should include the name of the training module, the date training occurred, the signature of the employee upon completion of training, the signature of an authorized person who can verify completion of training, and the date retraining is due. The completed sheet is forwarded to the Chief Compliance Officer (CO) and the Record Keeping Manager.

## Evaluating Employees

- Carry out regular evaluations to provide positive feedback to workers and identify areas where more training or effort on the part of the employee may be needed.
- Design the evaluation such that an employee feels more confident about doing his/her work after the meeting.
- Avoid stereotyping an employee by gender, culture, disability, etc., which can lead to a misinterpretation of an employee's responses or behavior during an evaluation.

- In addition to annual performance reviews, managers may wish to carry out more frequent “check-ins” to learn about employee concerns and suggest small modifications to processes.
- Prior to an evaluation:
  - Select a private location for the evaluation that will reduce potential interruptions.
  - Schedule an appointment with the employee, giving him/her enough time to prepare. Provide the employee with his/her job description and have the employee prepare a short self-evaluation. The employee may already be aware of shortcomings in his or her work that need to be addressed.
  - Review the employee’s file, including results of prior reviews.
  - Review any datasets that provide information on the employee’s work effort, such as sales results or productivity indicators.
  - Compile any information that has been learned from communication with supervisors or coworkers that may need to be addressed during the meeting.
  - Identify accomplishments for which the employee deserves positive recognition.
  - Prepare a list of questions to ask to help identify areas that may need improvement and to gauge the employee’s job satisfaction.
  - If an employee’s performance needs to improve, decide ahead of time if it will be a verbal or written warning. Verbal warnings should be documented in the employee’s file. If a written warning is appropriate, prepare a detailed list of expectations based on policies and procedures that will need to be met. This may be presented as a Notice of Needed Improvements (Appendix D).
- If an employee makes any negative comments or becomes emotional, view it as an opportunity to learn about a concern. Do not be critical of an employee’s emotions. The conversation should be refocused on facts rather than assumptions or feelings. The evaluator should work with the employee to identify a solution to the problem, if not during the meeting, then as soon as possible thereafter.
- Do not insult an employee. Concerns about his or her work must be presented honestly, and simply described as the need to meet specific expectations.
- Explain to the employee what the impacts are of his/her inappropriate behavior.
- Employees should be given an opportunity to improve performance before written disciplinary documentation is placed in his/her file. Find out if repeated tardiness, extensive periods of time on the phone, or other behaviors are due to difficulties that could be helped with counseling or other assistance.

- Prior to implementing a disciplinary procedure, the manager should verify the facts regarding the misconduct and confirm the company's policy on the issue.
- If the employee has been provided with a list of needed improvements, both the manager and the employee should sign and date it. A copy should be given to the employee and the original placed in the employee's file. The manager should follow up with the employee and give positive feedback if appropriate or review the disciplinary procedure and next steps that will occur.
- The Disciplinary Policy in the Employee Handbook should be written with a clear understanding of the rights of the employee, which can vary by state, and may also be subject to terms of a Labor Agreement.
- Managers are responsible for consistently following the policy and all legal requirements.
- During a meeting that involves a disciplinary action, the employee should always be given an opportunity to give his/her point of view. Give the employee up to a week to write a response. The response should be maintained as part of the employee's record. The employee may request that a manager from a different department review the evaluation documentation and response.
- Reassignment or suspensions may be appropriate in the case of behavioral issues or severe conflict in which the employee has to be removed from a situation immediately, but termination isn't called for. Reassignment refers to retraining (rehabilitative). Suspension means some condition must be met before the suspension is over or the employee is terminated (punitive).
- Decisions to suspend or terminate an employee must be reviewed and approved by a member of the executive staff, or by the Board of Directors if the employee is on the executive staff.

## Appendix A: Hiring Tracker

Funded: Money has been allotted to cover salary, benefits, equipment needs, etc.

Hire Goal: Number of people needed to fill positions.

Hiring Budget: Amount allocated for time commitments, job website fees, recruiting agency fees, job fair fees, etc.

Status: Job Description Complete; Position Posted; Interviewing; Intake Process in Progress; Completed.

Assigned To: Person responsible for ensuring process is completed.

<b>Position</b>	<b>Funded (Y/N)</b>	<b>Hire Goal</b>	<b>Hiring Budget</b>	<b>Status</b>	<b>Assigned To</b>	<b>Comments</b>
Chief Executive Officer		1	\$			
Chief Compliance Officer		1	\$			
Security Manager		1	\$			
Security Staff		5	\$			
Computing Security Manager		1 (part-time)	\$			
Inventory Control Manager		1	\$			
Inventory Control Staff		2	\$			
Record Keeping Manager		1	\$			
Chief Financial Officer		1	\$			
Sales Manager		1	\$			

Facilities Manager		1	\$			
Facilities Staff		2	\$			
Quality Assurance Officer		1	\$			
Quality Assurance Staff		1	\$			
Director of Production		1	\$			
			\$			
			\$			
			\$			
			\$			
			\$			
<b>Totals</b>			\$			

# Appendix B: Employee Intake Form Checklist

Employee Name: \_\_\_\_\_

Position: \_\_\_\_\_ Position Code: \_\_\_\_\_

Hire Date: \_\_\_\_\_

[Add or delete documents from the table according to the needs of your business and state and local regulations.]

Document	Original in File	Dept. to Receive Copy	Date Copy Sent	Person Responsible	Date Forwarded to Record Keeper
Job Description					
Resume					
Employment Application					
Authorization to Conduct Checks					
Background Check					
Reference Check Documentation					
Offer Letter					
Insurance Acceptance Form		Insurance Co.			
Computing Security					

Agreement*					
W-4		IRS			
Direct Deposit Form		Bank			
Personal Data Form					
Form I-9		IRS			
State Income Tax Form		State Income Tax Dept.			
Key/Key Card User Agreement*					
Driving Agreement (Drivers Only)					

\*Available in the Security Plan

## Appendix C: Training Matrix

<p>Referenced Operating Plan (Column 3)</p> <p>C = Cultivation Plan  D = Dispensary/Retail  E = Employee Handbook  H = Health &amp; Safety Plan  I = Inventory Control Plan  O = Odor Control Plan  Q = Quality Assurance Plan  R = Record Keeping Plan  S = Security Plan  ST = Staffing &amp; Training  W = Waste Management Plan  OT = Other</p>	<p>Key to Employee Types (Columns 4-11)</p> <p>1 All Employees  2 Managers  3 Security Personnel  4 Cultivation Employees  5 Manufacturing Employees  6 Packaging and Labeling Employees  7 Transportation Employees  8 Dispensary/Retail Employees</p>
---	---

Training Topic	Brief Description	Plan	1	2	3	4	5	6	7	8
Effective Training Techniques	Instruction methods, student interaction, documentation and record keeping	ST		X						
Best Practices in Hiring	Writing job descriptions, preparing for an interview, regulations guiding interview questions	ST		X						
Evaluating Employees	Fair evaluations, preparing for a meeting, dealing with unsatisfactory performance	ST		X						
Reg-Federal Regulations	Information from the <a href="#">Wage and Hour Division</a> of the U.S. Department of Labor; OSHA workplace injury documentation	OT	X							
Reg-State Regulations	[Add link to State Regulations]	OT	X							
Reg-Local Regulations	[Add link to Local Regulations]	OT	X							
Reg-Environmental Regulations	[Add link to Environmental Regulations]	OT	X							
Sensitive Records	Definition, storage requirements, access, computing security, retention policy	R, S	X							
Employee Orientation	Policies, pay, benefits, evaluations, suspension, disciplinary procedures	E	X							
Emergency Preparation	Good housekeeping, prevention, engineering controls, finding emergency numbers, practice and drills	S	X							
CPR/1st Aid (Encouraged for all)	Recognizing and responding to a variety of medical situations, when to call for help	S		X	X					
Emer-Armed Robbery	Appropriate response, silent alarm, noticing details, notifying management, contacting law enforcement	S	X							
Emer-Burglary	Avoiding affected areas, notifying management, contacting law enforcement	S	X							
Emer-Other Security Breaches	Types, risks, response procedures, notifying management, contacting emergency responders	S	X							
Emer-Medical Emergencies	Notifying person on staff with CPR/1st Aid training, notifying management, contacting emergency responders	S	X							
Emer-Fire Emergencies	Evacuation procedure, fire extinguishers, notifying management, contacting emergency responders	S	X							
Emer-Evacuation Procedure	Panic alarm, routes of egress, closing doors, safely maintaining secured areas,	S	X							

	designated meeting place, notifying management, contacting emergency responders									
Emer-Drills and Emergency Exercises	Schedule, expectations, procedures, follow-up training	S	X							
Observation and Incident Reporting	Identifying behavioral cues, vulnerable areas needing extra security, reporting an issue	S	X							
Types of Diversion	Internal, customer, robbery, other potential issues	S	X							
Diversion Prevention	Inventory Control System, limiting access, reducing diversion opportunities, signage	S	X							
Diversion Response Procedures	Incident reporting, audits, notifying regulators and law enforcement	S	X							
Inventory Control System	Purpose, UID labels, system use, control points, system security, regulations, restrictions, notifications	I	X							
Inventory Procedure	Employee responsibilities, changes in disposition, storage of un-inventoried items, receiving, transfers, surveillance, maintaining inventory control if access to the system is lost	I	X							
Certified Scales	Purpose, proper use, calibration, maintenance, logs	I	X							
Inventory Reporting	Accessing reports from the inventory control system, regularly scheduled reports, responding to requests from regulators/law enforcement, system backups	I		X						
Inventory Validation	Regulations, schedule, responsibilities, logging discrepancies, record keeping	I	X							
Inventory Discrepancy Procedure	What qualifies as a discrepancy, audits, logs, reporting, record keeping	I	X							
Storage Access and Procedures	Storage requirements, access controls, surveillance, logs, record keeping	S	X							
Transferring between Control Points	Procedure, inventory control, contamination controls, surveillance	S, I	X							
Receiving Controlled Products	Security at receiving location, security logs, entering received products into inventory control, storage of un-inventoried items	S, I	X							
Entry into the Inventory Control System	Original UID tag assignment, required information, changes in disposition,	I								

	control points, waste management, transfer off premises									
Quarantine Protocols	When quarantine is required, storage requirements, quarantine, inventory control, removing from quarantine	C	X							
Shutdown Procedures	Responsibilities, tasks,	H	X							
Computing Security	Access, user agreement, preventing malware attacks	S	X							
Incident Command System (ICS) Training	Integrated management of command, operations, planning, logistics, intelligence & investigations, finance and administration - provided by a 3rd party	S			X					
National Incident Management System (NIMS) Training	Integrated management of incidents, hazards, natural disasters, and other impacts - provided by a 3rd party	S			X					
Employee Access to Premises	Badging, access levels, access codes, restricted areas, access termination	S	X							
Visitor Access to Premises	Visitor badging, logs, escorting visitors, record keeping	S		X	X					
Alarm Systems	Regulatory requirements, operation, maintenance, alarmed locations, logs	S		X	X					
Video Surveillance Systems	Equipment, operation, maintenance, procedures, retrieval, retention	S		X	X					
Vault/Safe Access	Physical requirements, access procedures and logs, surveillance	S		X	X					
Closing Procedure	Closing checklist, facility map, checking locks and security equipment, procedure for broken locks or systems	S		X	X					
Safety Committee	Purpose, responsibilities, procedure reviews, soliciting comments from staff, staying informed on issues	H	X							
Tool and Equipment Safety	Training on safe use of tools and machines	H	X	X						
Facility Safety Rules	Evacuation procedures, maintaining safe paths of egress, emergency equipment maintenance	H	X							
Hazard Management	Recognizing hazards, inspections, unsafe work practices, reporting	H	X							
Job Hazard Analysis	Purpose, responsibilities, frequency, process, updating procedures	H	X							

Safety Data Sheets (SDSs)	Globally Harmonized System, purpose, sections, hazard pictograms, hazard communication	H, C	X						
Container Labeling	SDSs, requirements, symbols, signal words, hazard statements	H	X						
Personal Protective Equipment (PPE)	Purpose, proper use, maintaining supplies, SDS information	H	X						
Chemical Spill Response	Incidental vs. non-incidentals spills, PPE, clean up supplies, identifying potential risk to the environment	S or H	X						
Respiratory Protection	Proper equipment and use, respiratory risks, SDSs	H			X	X			
Protecting the Environment by Monitoring Water	Regulations, testing procedures, logs and record keeping, modifying pH	W			X	X			
Ladder Safety	Types of ladders, safe use, 3 points of contact	H	X						
Heat Stress	Risks, identifying symptoms, response procedure	H			X	X			
Poison Control	Sources of poisons, response procedure, posting of Poison Center phone #	H	X						
Safe Lifting	Body positioning, when to ask for help or use equipment, PPE	H	X						
Lockout System	Taking equipment out of service, responsibilities, lockout removal procedure	H							
Fire Extinguisher Use (Encouraged for all)	Locations, PASS, safety precautions	S		X	X				
Electrical Safety (as needed)	Risks, precautionary measures, PPE, advanced equipment lockout	H							
Basic Safety Rules	Housekeeping, obeying signs, training, following procedures, etc.	H	X						
Sanitation	Frequency, process, PPE	H	X						
Logs and Record Keeping	Purpose, types, document retrieval system, retention	R	X						
Equipment	Proper use, maintenance, inspections, repairs, lockout, contamination issues, logs	C, M, P			X	X	X		
Driving Safety (+ All Company Drivers)	Awareness, space between vehicles, driving in heavy traffic and inclement weather, what to do when an accident occurs	T							X
Product Testing		Q			X	X			

Testing Sample Preparation	Purpose, selecting samples, record keeping	Q				X	X				
Bloodborne Pathogens	Response procedure, Hepatitis B	H	X								
Storage Requirements (temp, humidity, etc.)	Environmental conditions of finished flower and associated products and materials	C		X		X	X	X	X	X	X
Processing	Processing stages, environmental conditions	C				X					
Methods of Cultivation	Plant stages, seeds vs. cloning, lighting requirements	C				X					
Plant Inspection	Daily checklist, logging plant and environmental conditions, pest management	C, Q				X					
Tracking Lots and Plants	Managing seed and cutting lots, applying UIDs, cross referencing to cultivation records	C				X					
Media	Media types and watering methods	C				X					
Cultivation Equipment	Types and purpose	C				X					
Fertilizers	Procedure for administering nutrients	C				X					
Seed Propagation		C				X					
Clone Propagation	Required attire, tool preparation, procedure, monitoring	C				X					
Vegetative Growth and Flowering	Definitions, light requirements, length	C				X					
Harvesting	Process description, cautions	C				X					
Job-specific Risks and Emergencies	Specific types of accidents that may occur, use of job risk analysis, managing changes in workflow or processes, updating procedures	M	X								
Good Manufacturing Practices	Risk analysis and management, quality assurance, safety, existing guidelines	M					X	X			
Working with Solvents	SDSs, potential health hazards, evaluating exposure, engineering controls, PPE, containers and labeling, reuse	M					X				
Extraction Methods	Types of extracts, chemistry, working with heating elements, working with batches, inventory control, scales and other equipment, workflow, safety, sanitation, storage	M					X				

Mixing	Working with batches, inventory control, ingredients, scales and mixing equipment, safety, sanitation, storage	M					X			
Infusion Methods	Working with heating elements, working with batches, inventory control, ingredients, scales and infusion equipment, safety, sanitation, storage	M					X			
In-process Sampling and Controls	Selecting a sample, preparing a sample, homogenization, workflow, inventory control, procedures for failed samples, record keeping	M					X			
Food/Ingredient Safety and Storage	Perishables, variations in shelf life, effects of heat, light, and oxygen	M					X	X		
Reuse of Materials	Working with batches, inventory control	M					X			
Equipment Inspection	Risks of working with equipment, maintenance procedures, maintenance and repair logs, sanitation, record keeping	CMP				X	X	X		
Contamination Control	Routes of contamination, sanitation, PPE and other engineering controls,	CMPD				X	X	X		X
Expirations/Time Limits	Effects of heat, light, and oxygen, determining expiration dates, managing expired products, inventory control	Q		X		X	X	X		X
Batch Management	Understanding batches, when/if batches can be mixed, inventory control issues, logs and record keeping	I				X	X			
UID Issuance and Control	Procuring and secure storage of UID tags	I		X		X	X	X		
Label Design	Avoiding appealing to children, label requirements, proofing	P						X		
Packaging and Labeling Procedures	Ensuring accurate and complete label information in accordance with state law	Q						X		
Quality Control	Responsibilities, sampling and testing, adverse events and recalls, changes to procedures	Q		X						
Interacting with Regulators		S		X	X					
Interacting with Law Enforcement		S		X	X					
Point of Sale System	Software, security, integration into inventory control system, scales	D								X
Returns, Complaints, Adverse Events, and Recalls	Who to notify, response procedures, logs and record keeping	Q		X						X
Sales Techniques	Interacting with and educating customers	D								X



Odor Control	Definitions, mitigation, procedures, physical measures and equipment, system maintenance	O					X	X				
Workplace Violence Policy	Expectations, reporting new or potential incidents, disciplinary action	S	X									

## Appendix D: Notice of Needed Improvements

### Employee Information

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Employee ID: \_\_\_\_\_

Position: \_\_\_\_\_

Manager: \_\_\_\_\_

### Warning Status

\_\_\_\_ First Warning

\_\_\_\_ Second Warning

\_\_\_\_ Final Warning

### Area of Needed Improvement

\_\_\_\_ Lateness/Leaving Early

\_\_\_\_ Low Productivity

\_\_\_\_ Skipped Shift

\_\_\_\_ Procedure Violation

\_\_\_\_ Inappropriate Behavior

\_\_\_\_ Other: \_\_\_\_\_

Description of Issue, including date and time of a specific incident if applicable:

Needed Improvements:

### Acknowledgements

By signing this form, I verify that I understand of the types of improvements needed as specified above. I also understand that making these improvements is necessary to avoid possible disciplinary action. If I do not agree with the information documented in this form, I may write a reply and have it placed in my file attached to this form and have the information reviewed by a second evaluator.

Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Evaluator Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Witness if employee does not sign: \_\_\_\_\_ Date: \_\_\_\_\_

## Appendix E: Personal Vehicle Driving Agreement

Employees may be requested to operate their owned, leased, or rented vehicle to conduct Jolly Green Inc business.

Jolly Green Inc does not assume any liability for bodily injuries or property damage the vehicle owner, driver, or passengers may become personally obligated to pay arising out of such operation. When operating your personal vehicle on behalf of [Company], the following policies must be followed:

- The driver must be determined to meet all Jolly Green Inc driver qualification standards described in this agreement before being permitted to operate a personal vehicle on Jolly Green Inc business. Failure to continue to meet these qualification standards will result in revocation of the Employee’s driving responsibilities.
- The vehicle being operated must have a valid registration, and proof of registration must be kept in the vehicle. Employee drivers must possess a current and valid driver’s license on their person at all times while operating the vehicle.
- Automobile insurance meeting the legal minimum requirements of the vehicle’s state of registry must be maintained on the vehicle being used, and a valid insurance identification card must be kept in the vehicle. Proof of such insurance must be provided to Jolly Green Inc when the driver is initially added to Jolly Green Inc’s driver list and whenever requested thereafter.

- Jolly Green Inc does not specify and assumes no responsibility for any other coverage Employees carry on the vehicles used, but encourages those operating vehicles on behalf of Jolly Green Inc on a regular basis to maintain limits of at least \$100,000 each person/\$200,000 each occurrence for bodily injury and \$100,000 property damage, or a combined single liability (CSL) limit of \$300,000, plus uninsured motorist (UM) and underinsured motorist (UIM) coverage.
- Vehicles should be maintained so as to permit reliable and safe operation. The vehicle owner/driver is responsible for all maintenance and associated costs.
- Seatbelts and other required safety restraints must be used at all times.
- All traffic laws must be obeyed. Jolly Green Inc is not responsible for and will not reimburse Employees for any moving or non-moving violations received as a result of operating a vehicle on behalf of the organization.
- Vehicles may not be operated while the driver is under the influence of alcohol or any other controlled substance, including any prescription or over-the-counter medications that may affect driving ability.

## Reporting Requirements

In order to ensure that drivers maintain compliance with the company driver qualification standard, drivers are required to report all moving violations and at-fault accidents, or drivers' license status changes (suspension, revocation, new license, etc.) to a supervisor within 72 hours of conviction, determination, or status change effective date.

### Accidents Involving Use of Personal Vehicles

If you are involved in an accident in your personal or rented vehicle while traveling on business, a claim should be filed with your personal automobile insurance company, as that policy will provide primary coverage. However, the accident should still be reported to your supervisor.

### Violations of Policy

Failure to comply with any of these policies may result in suspension of driving responsibilities on behalf of Jolly Green Inc.

I have reviewed and received a copy of this Jolly Green Inc Vehicle and Driving Agreement. I agree to abide by all policies and procedures to ensure safety of myself and the general public, when driving to conduct business on behalf of Jolly Green Inc.

(Print your first and last name)

---

Signature

---

Date

# Record Keeping Plan





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# Introduction

This Record Keeping Plan describes the policies, procedures, controls, and other measures that will be implemented to ensure a paper and electronic records are properly managed to comply with local and state requirements.

Company records will also be maintained to provide operational information to company managers, advisors, and owners for decision-making purposes, and to provide information in case of insurance, criminal, or regulating authority investigations.

A primary goal is to maintain information that will meet not only regulatory requirements, but also be transparent and admissible in court. State and local laws supersede any item in the Plan that does not meet regulatory requirements.

Within this plan Jolly Green Inc is often referred to as “the product.” Where an “employee” is referred to in this plan, it also includes other individuals involved with Jolly Green Inc, including owners, officers, agents, and others representing the company.

Sensitive records include, but are not limited to, personal identity information, protected health information, credit card data, financial records, intellectual property, password records, information related to a criminal investigation, material covered by any non-disclosure agreements, information identified by regulating authorities as restricted, security and operating records for which the availability would make the company vulnerable to criminal activity, and other information for which the degree of adverse effect that may result from unauthorized access or disclosure is high.

Several record keeping policies overlap with other procedures. Some items are repeated in both the Record Keeping Plan and the other plans, and in other cases, this plan refers to the other documents.

# General Record Keeping Policies

## Regulatory Compliance

All records associated with business conducted by Jolly Green Inc will be made available to local and state regulatory authorities upon request or on a regular basis as specified by regulations. Records will be stored in a manner that will make them easily accessible in order to comply with immediate requests for information by local and state authorities.

Records specified for retention under state regulations will be retained for seven years. Records not covered by regulatory standards will be retained for no less than three years.

Should Jolly Green Inc cease operations, the owners/board members will come to an agreement with local and state regulating authorities for the retention of and accessibility to required records for a specified period of time.

Anyone who knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any electronic or paper record will face immediate termination and potential criminal prosecution.

Any employee who becomes aware of another's intent or action related to knowingly altering company records must report the information to a security officer or a senior manager.

### Record keeping procedures 935 CRM 500

- Maintenance of waste disposal records. When marijuana products or waste is disposed or handled, Jolly Green Inc will create and maintain a written or electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Marijuana Establishment Agents present during the disposal or other handling, with their signatures. Marijuana Establishments shall keep these records for at least three years. This period shall automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Record keeping – Jolly Green Inc will keep records make them available to the Commission, upon request. The records of a Marijuana Establishment shall be maintained in accordance with generally accepted accounting principles. Written records

that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500

- Jolly Green Inc will maintain a copy of our written operating procedures. It will contain a set of detailed written operating procedures as required by 935 CMR 500.105(1)
- Jolly Green Inc will maintain written Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105 (9) C
- Jolly Green Inc will maintain the following written personnel records:

Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions. A personnel record for each marijuana establishment agent. Jolly Green Inc will maintain records for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:

1. Jolly Green will maintain records of employee responsibilities, qualifications, and supervision.
  2. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title
  3. Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.
- documentation of periodic performance evaluations; a record of any disciplinary action taken.

Business record requirements: Jolly Green Inc will maintain the following records.

- Assets and liabilities.
- Monetary transactions Books of accounts, which shall include journals, ledgers, and supporting documents agreements, checks, invoices, and vouchers.
- Sales records including the quantity, form, and cost of marijuana products; and Salary and wages paid to each employee, stipend paid to each board member, and an any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation.

Waste disposal records:

Jolly Green Inc will maintain written waste disposal records per 935 CMR 500 (9) (F).

## Paper and Electronic Records

Jolly Green Inc will use a record management software to scan and index/tag paper files and store electronic files to ensure rapid and accurate access to records.

Paper records will be scanned into electronic format for backup purposes on a periodic basis, no less than once per month. Once the electronic version of the paper record has been backed up, the paper version may be shredded (if sensitive) or discarded.

Paper records to be maintained for longer than one month will be filed within two months according to a system designated by the officer responsible for records management, in cabinets or boxes that are clearly labeled, and in a secured location.

Electronic records scheduled for destruction will be managed according to Guidelines for Media Sanitation, NIST Special Publication 800-88, Revision 1.

Electronic file organization will follow recommendations from the National Institute of Standards and Technology.

A records backup and archiving policy will be developed by senior managers using tools for the management of electronic records recommended by the National Archives.

Sensitive business files will be maintained in a separately secured server location from files used on a daily basis by regular employees. Employees will only have access to records needed to carry out their responsibilities.

Backup copies of sensitive archived material will be encrypted or password protected and stored in a secured cloud environment, or, if on removable media, off-site in a vault or safe where it is easy to access and easily reproducible.

All archived records to be kept for more than seven years will be converted into a format that is standardized such that changes in software and technology will not prevent access to the records.

The integrity and authenticity of stored data will be maintained to the level that they could be accepted as evidence in a court of law. Jolly Green Inc will develop a protocol for conducting business on paper in the event of an outage of any electronic system, including the transference of the paper data to the electronic system once the problem is corrected. All employees will be trained on the procedures.

## Privacy

A minimum amount of information will be collected during financial transactions with customers to reduce the likelihood that personal information can be stolen.

Only personal information on employees that is required by law will be collected and stored. Employee records, particularly those related to work authorization, potential disciplinary investigations, or background checks will be kept confidential and stored in a secure location.

Any medical information collected on employees or customers will be stored separately and under an extra level of security. These records will be kept in accordance with the Americans with Disabilities Act (ADA), the Genetic Information Nondiscrimination Act (GINA), and/or the Health Insurance Portability and Accountability Act (HIPAA), as applicable.

## Employee Involvement

Staff will be asked to review record keeping procedures related to their specific tasks at least once per year and give recommendations for improvements.

# Roles and Responsibilities

## Chief Compliance Officer

1. The Chief Compliance Officer (CCO) will be responsible for ensuring that this Record Keeping Plan is properly implemented, including dissemination of this plan and the training of employees as to its application. The CCO may designate a Record Keeping Manager to implement certain tasks outlined in this Plan.
2. The CCO will define the structure of a record management system, including a document retrieval system, and maintain training for him/herself and others in the various components of the system.

3. The CCO will develop/maintain an indexing/tagging system which can be utilized to efficiently categorize and retrieve needed data from the document retrieval system.
4. An instruction manual will be written by the CCO describing how to retrieve records from the system. Senior managers will be trained in pulling data from the document retrieval system to ensure that records and datasets can be retrieved immediately upon request from regulating authorities or law enforcement.
5. The CCO is responsible for ensuring the upload of or otherwise providing data from the inventory control or track-and-trace system to the regulating authority in the manner and on the schedule specified by regulations.
6. The CCO will regularly report to the Chief Executive Officer on the status and efficacy of the Record Keeping Plan. The CCO will review the Plan annually and recommend changes or amendments to the Chief Executive Officer to improve procedures or processes.
7. The CCO shall stay up to date on records-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other record keeping experts.

The CCO will coordinate with the officers and managers listed below to ensure that records collected across all departments will be processed according to the Plan.

- Chief Financial Officer
- Security Manager
- Quality Assurance Officer
- Inventory Control Manager
- Computing Security Manager
- Cultivation Manager
- Transportation Manager
- Manufacturing Manager
- Processing Manager

## Record Keeping Manager

1. Receiving and organizing documents from all departments
2. Indexing documents in the document retrieval system
3. Recommend changes to the CCO related to the indexing/tagging system

## Record Types & Maintenance of Financial Records Procedures.

### Business Records

- Deeds, titles, rental agreements, property records
- Most recent versions of operating plans
- Tax records required by federal, state, and local authorities, including records of late payment penalties and unpaid tax obligations
- Insurance documents
- Permits and licenses
- All correspondence with regulatory authorities
- Up-to-date local and state regulations related to the cannabis license, waste management, environmental compliance, hazardous materials, etc.
- Business documents filed with the Secretary of State
- Business property inventories and related records
- Employee forms, including IRS forms, background check results, documentation of proof of authorization to work, reference verifications, evaluations, and records of investigations and disciplinary actions. Each employee's personal information will only be collected as required by law to reduce potential incidents of identity theft
- OSHA requirements and documentation related to workplace injury, OSHA Form 300, or Form 301 if injuries have occurred
- Property diagrams
- Collective or Cooperative Membership Agreement (if applicable)
- Records relating to physical modification of or upgrades to the premises
- Manufacturer's records related to any generators to be used on the premises and permits or other compliance documentation from air quality regulators
- Labor agreement.
- Staffing plans, organizational charts, and job descriptions.

- Accounting records including, but not limited to, bank statements; monthly, quarterly and annual financial reports; ledgers and journals; vouchers; and all supporting documentation.
- Complete sales receipts/invoices containing all data required by regulating authorities.
- Purchasing receipts/invoices.
- Utility records, including documentation from electrical utility indicating greenhouse gas emission intensity per kilowatt hour (if available).
- Payroll records.
- Records of stipends, bonuses, and non-monetary compensation to individuals or companies, including benefits. The records will include an estimated dollar value for non-monetary compensation.
- Records documenting community involvement.
- Updated emergency contact lists.
- Training records, including type of training offered, date taken, and names of trained employees.
- Meeting minutes and memos.

#### Maintenance of Financial Records Procedures:

- Jolly Green Inc will not be utilizing software or other methods that could manipulate or alter sales data.
- Jolly Green Inc. shall 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. A Marijuana Retailer shall maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If a 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: it shall immediately disclose the information to the Commission; it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and  
3. take such other action directed by the Commission to comply with 935 CMR 500.105.
- Jolly Green Inc will comply with 830 CMR 62C.25.1 Record retention and DOR directive 16-1 regarding record keeping.

- Jolly Green Inc shall adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.
- Jolly Green Inc may colocated with a medical marijuana treatment center shall 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 500.140(10).

## Security Records

- Training records, including type of training offered, date taken, and names of trained employees.
- Police reports resulting from any crime-related event on the property.
- Contracts with outside security providers.
- Security equipment manuals and maintenance and inspection logs.
- Surveillance video: See the Security Plan for details.
- Completed closing procedure checklists.
- Updated lists of employee access levels.
- Security access logs (See Security Plan, Appendix A).
- Signed Key/Key Card User Agreements (See Security Plan, Appendix B).
- Weekly electronic records showing the date, time, and name of personnel accessing secured areas.
- Completed exiting employee checklists.
- Completed visitor logs (See Security Plan, Appendix C).
- Product delivery logs maintained by security personnel (See Security Plan, Appendix D).

- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Incident reports related to emergencies, chemical spills, accidents, external threats, workplace violence, harassment and other unexpected events.

## Inventory Control Records

- All information created within the inventory control/track-and-trace system selected by the regulating authority.
- All UIDs assigned to products in inventory and all unassigned UIDs. UIDs associated with product that has been retired from the track-and-trace system will be retained for six (6) months after the date the tags are retired.
- All attributes associated with each product UID, including name, type, batch, strain, weight/count, source (if transferred in from another licensee), and transaction dates and times. Additional details required by the regulating authority will also be collected and maintained.
- Updated lists of employees with access to the inventory system.
- Training records, including type of training offered, date taken, and names of trained employees.
- Logs of errors found within the inventory system and notes on steps taken to correct errors.
- All inventory results, including the date, time, and names, signatures, and titles of inventory takers.
- Records regarding missing inventory and documentation of follow-up actions.
- Records of inventory discrepancies reported to law enforcement and/or regulating authorities.
- Documentation regarding notifications from the inventory system that cannot be resolved within the specified timeframe.

In addition to records required by regulations, electronic sortable reports related to the following will be producible for management purposes.

Location of all products on the premises by room/cabinet/storage location, including UID, description, date and time transferred to location, weight or count, name or ID of employee. Reports of products removed from a storage location, including date and time, UID, description, name or ID of employee, weight or count, and destination.

Reports of transferred products by UID that can be compared electronically pre and post-transfer to identify discrepancies in inventory, and reports of the resulting comparisons. Reports showing trends in sales patterns, demographics, product quality, or other attributes. Additional reports requested by senior managers or regulating authorities.

## Computing Security Records

- Signed Network and Computing Resources User Agreements (See Security Plan, Appendix E).
- Software contracts/licensing documentation.
- Electronic record retention policies.
- Documentation of unauthorized attempts to access the computer network.
- Records of device, software, operating systems, and network security updates.
- Results of security audits.
- Certifications of electronic records destruction or disposal.
- Other records selected by the Computing Security Manager for backup to the records management system.

## Cultivation Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to cultivation activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Scale calibration logs.
- Chemical Safety Data Sheets.
- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to the disposal of hazardous waste.
- Environmental compliance documentation.
- Documentation of the previous use of land (if applicable).
- Water supply records.

- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Record of internally-identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.
- Sampling and testing specifications and results and other quality assurance documentation.
- Janitorial logs relating to sanitation of facilities.
- Maintenance logs, including inspection and repair, relating to lighting, irrigation and ventilation systems, pest control systems, water and effluent discharge systems, etc.
- Record of product complaints and steps taken to resolve issues.
- Adverse event records (related to a negative effect of a product on a user).
- Records relating to product rejections or recalls, including a recall plan.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Documentation of data utilized for setting prices and rationale for the selected price.
- See the Cultivation and Chemical Safety Plans for additional record types related to planting, pruning, propagation, harvesting, and fertilizer and pesticide use.

## Transportation Records

- In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, Jolly Green Inc will retain the following records related specifically to transportation activities:
- Transportation manifests showing all information required by regulating authorities.
- Records showing trip plans and the start and end times of each trip.
- Documentation of approved changes to trip plans.
- Transportation Event Logs of variances between expected and actual trip activities.
- Records of vehicle accidents.
- Records and police reports related to product losses occurring during transportation activities.

## Manufacturing Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to manufacturing activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Chemical Safety Data Sheets.
- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to the disposal of hazardous waste.
- Environmental compliance documentation.
- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Product specifications.
- Sampling and testing specifications and results and other quality assurance documentation.
- Record of identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.
- Record of product complaints and steps taken to resolve issues.
- Adverse event records (related to a negative effect of a product on a user).
- Records relating to product rejections or recalls, including a recall plan.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Janitorial logs relating to sanitation of facilities.
- Documentation of data utilized for setting prices and rationale for the selected price.

## Packaging and Labeling Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically

to packaging and labeling activities: Training records, including type of training offered, date taken, and names of trained employees.

## Dispensary Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to dispensary activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Records required relating to the sale of products to medical patients (if applicable).
- Documentation of data utilized for setting prices and rationale for the selected price.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.

## Other Records

- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Record of identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Janitorial logs relating to sanitation of facilities.

# Record Keeping Plan





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# Introduction

This Record Keeping Plan describes the policies, procedures, controls, and other measures that will be implemented to ensure a paper and electronic records are properly managed to comply with local and state requirements.

Company records will also be maintained to provide operational information to company managers, advisors, and owners for decision-making purposes, and to provide information in case of insurance, criminal, or regulating authority investigations.

A primary goal is to maintain information that will meet not only regulatory requirements, but also be transparent and admissible in court. State and local laws supersede any item in the Plan that does not meet regulatory requirements.

Within this plan Jolly Green Inc is often referred to as “the product.” Where an “employee” is referred to in this plan, it also includes other individuals involved with Jolly Green Inc, including owners, officers, agents, and others representing the company.

Sensitive records include, but are not limited to, personal identity information, protected health information, credit card data, financial records, intellectual property, password records, information related to a criminal investigation, material covered by any non-disclosure agreements, information identified by regulating authorities as restricted, security and operating records for which the availability would make the company vulnerable to criminal activity, and other information for which the degree of adverse effect that may result from unauthorized access or disclosure is high.

Several record keeping policies overlap with other procedures. Some items are repeated in both the Record Keeping Plan and the other plans, and in other cases, this plan refers to the other documents.

# General Record Keeping Policies

## Regulatory Compliance

All records associated with business conducted by Jolly Green Inc will be made available to local and state regulatory authorities upon request or on a regular basis as specified by regulations. Records will be stored in a manner that will make them easily accessible in order to comply with immediate requests for information by local and state authorities.

Records specified for retention under state regulations will be retained for seven years. Records not covered by regulatory standards will be retained for no less than three years.

Should Jolly Green Inc cease operations, the owners/board members will come to an agreement with local and state regulating authorities for the retention of and accessibility to required records for a specified period of time.

Anyone who knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any electronic or paper record will face immediate termination and potential criminal prosecution.

Any employee who becomes aware of another's intent or action related to knowingly altering company records must report the information to a security officer or a senior manager.

### Record keeping procedures 935 CRM 500

- Maintenance of waste disposal records. When marijuana products or waste is disposed or handled, Jolly Green Inc will create and maintain a written or electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Marijuana Establishment Agents present during the disposal or other handling, with their signatures. Marijuana Establishments shall keep these records for at least three years. This period shall automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Record keeping – Jolly Green Inc will keep records make them available to the Commission, upon request. The records of a Marijuana Establishment shall be maintained in accordance with generally accepted accounting principles. Written records

that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500

- Jolly Green Inc will maintain a copy of our written operating procedures. It will contain a set of detailed written operating procedures as required by 935 CMR 500.105(1)
- Jolly Green Inc will maintain written Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105 (9) C
- Jolly Green Inc will maintain the following written personnel records:

Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions. A personnel record for each marijuana establishment agent. Jolly Green Inc will maintain records for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:

1. Jolly Green will maintain records of employee responsibilities, qualifications, and supervision.
  2. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title
  3. Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.
- documentation of periodic performance evaluations; a record of any disciplinary action taken.

Business record requirements: Jolly Green Inc will maintain the following records.

- Assets and liabilities.
- Monetary transactions Books of accounts, which shall include journals, ledgers, and supporting documents agreements, checks, invoices, and vouchers.
- Sales records including the quantity, form, and cost of marijuana products; and Salary and wages paid to each employee, stipend paid to each board member, and an any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation.

Waste disposal records:

Jolly Green Inc will maintain written waste disposal records per 935 CMR 500 (9) (F).

## Paper and Electronic Records

Jolly Green Inc will use a record management software to scan and index/tag paper files and store electronic files to ensure rapid and accurate access to records.

Paper records will be scanned into electronic format for backup purposes on a periodic basis, no less than once per month. Once the electronic version of the paper record has been backed up, the paper version may be shredded (if sensitive) or discarded.

Paper records to be maintained for longer than one month will be filed within two months according to a system designated by the officer responsible for records management, in cabinets or boxes that are clearly labeled, and in a secured location.

Electronic records scheduled for destruction will be managed according to Guidelines for Media Sanitation, NIST Special Publication 800-88, Revision 1.

Electronic file organization will follow recommendations from the National Institute of Standards and Technology.

A records backup and archiving policy will be developed by senior managers using tools for the management of electronic records recommended by the National Archives.

Sensitive business files will be maintained in a separately secured server location from files used on a daily basis by regular employees. Employees will only have access to records needed to carry out their responsibilities.

Backup copies of sensitive archived material will be encrypted or password protected and stored in a secured cloud environment, or, if on removable media, off-site in a vault or safe where it is easy to access and easily reproducible.

All archived records to be kept for more than seven years will be converted into a format that is standardized such that changes in software and technology will not prevent access to the records.

The integrity and authenticity of stored data will be maintained to the level that they could be accepted as evidence in a court of law. Jolly Green Inc will develop a protocol for conducting business on paper in the event of an outage of any electronic system, including the transference of the paper data to the electronic system once the problem is corrected. All employees will be trained on the procedures.

## Privacy

A minimum amount of information will be collected during financial transactions with customers to reduce the likelihood that personal information can be stolen.

Only personal information on employees that is required by law will be collected and stored. Employee records, particularly those related to work authorization, potential disciplinary investigations, or background checks will be kept confidential and stored in a secure location.

Any medical information collected on employees or customers will be stored separately and under an extra level of security. These records will be kept in accordance with the Americans with Disabilities Act (ADA), the Genetic Information Nondiscrimination Act (GINA), and/or the Health Insurance Portability and Accountability Act (HIPAA), as applicable.

## Employee Involvement

Staff will be asked to review record keeping procedures related to their specific tasks at least once per year and give recommendations for improvements.

# Roles and Responsibilities

## Chief Compliance Officer

1. The Chief Compliance Officer (CCO) will be responsible for ensuring that this Record Keeping Plan is properly implemented, including dissemination of this plan and the training of employees as to its application. The CCO may designate a Record Keeping Manager to implement certain tasks outlined in this Plan.
2. The CCO will define the structure of a record management system, including a document retrieval system, and maintain training for him/herself and others in the various components of the system.

3. The CCO will develop/maintain an indexing/tagging system which can be utilized to efficiently categorize and retrieve needed data from the document retrieval system.
4. An instruction manual will be written by the CCO describing how to retrieve records from the system. Senior managers will be trained in pulling data from the document retrieval system to ensure that records and datasets can be retrieved immediately upon request from regulating authorities or law enforcement.
5. The CCO is responsible for ensuring the upload of or otherwise providing data from the inventory control or track-and-trace system to the regulating authority in the manner and on the schedule specified by regulations.
6. The CCO will regularly report to the Chief Executive Officer on the status and efficacy of the Record Keeping Plan. The CCO will review the Plan annually and recommend changes or amendments to the Chief Executive Officer to improve procedures or processes.
7. The CCO shall stay up to date on records-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other record keeping experts.

The CCO will coordinate with the officers and managers listed below to ensure that records collected across all departments will be processed according to the Plan.

- Chief Financial Officer
- Security Manager
- Quality Assurance Officer
- Inventory Control Manager
- Computing Security Manager
- Cultivation Manager
- Transportation Manager
- Manufacturing Manager
- Processing Manager

## Record Keeping Manager

1. Receiving and organizing documents from all departments
2. Indexing documents in the document retrieval system
3. Recommend changes to the CCO related to the indexing/tagging system

## Record Types & Maintenance of Financial Records Procedures.

### Business Records

- Deeds, titles, rental agreements, property records
- Most recent versions of operating plans
- Tax records required by federal, state, and local authorities, including records of late payment penalties and unpaid tax obligations
- Insurance documents
- Permits and licenses
- All correspondence with regulatory authorities
- Up-to-date local and state regulations related to the cannabis license, waste management, environmental compliance, hazardous materials, etc.
- Business documents filed with the Secretary of State
- Business property inventories and related records
- Employee forms, including IRS forms, background check results, documentation of proof of authorization to work, reference verifications, evaluations, and records of investigations and disciplinary actions. Each employee's personal information will only be collected as required by law to reduce potential incidents of identity theft
- OSHA requirements and documentation related to workplace injury, OSHA Form 300, or Form 301 if injuries have occurred
- Property diagrams
- Collective or Cooperative Membership Agreement (if applicable)
- Records relating to physical modification of or upgrades to the premises
- Manufacturer's records related to any generators to be used on the premises and permits or other compliance documentation from air quality regulators
- Labor agreement.
- Staffing plans, organizational charts, and job descriptions.

- Accounting records including, but not limited to, bank statements; monthly, quarterly and annual financial reports; ledgers and journals; vouchers; and all supporting documentation.
- Complete sales receipts/invoices containing all data required by regulating authorities.
- Purchasing receipts/invoices.
- Utility records, including documentation from electrical utility indicating greenhouse gas emission intensity per kilowatt hour (if available).
- Payroll records.
- Records of stipends, bonuses, and non-monetary compensation to individuals or companies, including benefits. The records will include an estimated dollar value for non-monetary compensation.
- Records documenting community involvement.
- Updated emergency contact lists.
- Training records, including type of training offered, date taken, and names of trained employees.
- Meeting minutes and memos.

#### Maintenance of Financial Records Procedures:

- Jolly Green Inc will not be utilizing software or other methods that could manipulate or alter sales data.
- Jolly Green Inc. shall 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. A Marijuana Retailer shall maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If a 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: it shall immediately disclose the information to the Commission; it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and  
3. take such other action directed by the Commission to comply with 935 CMR 500.105.
- Jolly Green Inc will comply with 830 CMR 62C.25.1 Record retention and DOR directive 16-1 regarding record keeping.

- Jolly Green Inc shall adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.
- Jolly Green Inc may colocated with a medical marijuana treatment center shall 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 500.140(10).

## Security Records

- Training records, including type of training offered, date taken, and names of trained employees.
- Police reports resulting from any crime-related event on the property.
- Contracts with outside security providers.
- Security equipment manuals and maintenance and inspection logs.
- Surveillance video: See the Security Plan for details.
- Completed closing procedure checklists.
- Updated lists of employee access levels.
- Security access logs (See Security Plan, Appendix A).
- Signed Key/Key Card User Agreements (See Security Plan, Appendix B).
- Weekly electronic records showing the date, time, and name of personnel accessing secured areas.
- Completed exiting employee checklists.
- Completed visitor logs (See Security Plan, Appendix C).
- Product delivery logs maintained by security personnel (See Security Plan, Appendix D).

- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Incident reports related to emergencies, chemical spills, accidents, external threats, workplace violence, harassment and other unexpected events.

## Inventory Control Records

- All information created within the inventory control/track-and-trace system selected by the regulating authority.
- All UIDs assigned to products in inventory and all unassigned UIDs. UIDs associated with product that has been retired from the track-and-trace system will be retained for six (6) months after the date the tags are retired.
- All attributes associated with each product UID, including name, type, batch, strain, weight/count, source (if transferred in from another licensee), and transaction dates and times. Additional details required by the regulating authority will also be collected and maintained.
- Updated lists of employees with access to the inventory system.
- Training records, including type of training offered, date taken, and names of trained employees.
- Logs of errors found within the inventory system and notes on steps taken to correct errors.
- All inventory results, including the date, time, and names, signatures, and titles of inventory takers.
- Records regarding missing inventory and documentation of follow-up actions.
- Records of inventory discrepancies reported to law enforcement and/or regulating authorities.
- Documentation regarding notifications from the inventory system that cannot be resolved within the specified timeframe.

In addition to records required by regulations, electronic sortable reports related to the following will be producible for management purposes.

Location of all products on the premises by room/cabinet/storage location, including UID, description, date and time transferred to location, weight or count, name or ID of employee. Reports of products removed from a storage location, including date and time, UID, description, name or ID of employee, weight or count, and destination.

Reports of transferred products by UID that can be compared electronically pre and post-transfer to identify discrepancies in inventory, and reports of the resulting comparisons. Reports showing trends in sales patterns, demographics, product quality, or other attributes. Additional reports requested by senior managers or regulating authorities.

## Computing Security Records

- Signed Network and Computing Resources User Agreements (See Security Plan, Appendix E).
- Software contracts/licensing documentation.
- Electronic record retention policies.
- Documentation of unauthorized attempts to access the computer network.
- Records of device, software, operating systems, and network security updates.
- Results of security audits.
- Certifications of electronic records destruction or disposal.
- Other records selected by the Computing Security Manager for backup to the records management system.

## Cultivation Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to cultivation activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Scale calibration logs.
- Chemical Safety Data Sheets.
- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to the disposal of hazardous waste.
- Environmental compliance documentation.
- Documentation of the previous use of land (if applicable).
- Water supply records.

- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Record of internally-identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.
- Sampling and testing specifications and results and other quality assurance documentation.
- Janitorial logs relating to sanitation of facilities.
- Maintenance logs, including inspection and repair, relating to lighting, irrigation and ventilation systems, pest control systems, water and effluent discharge systems, etc.
- Record of product complaints and steps taken to resolve issues.
- Adverse event records (related to a negative effect of a product on a user).
- Records relating to product rejections or recalls, including a recall plan.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Documentation of data utilized for setting prices and rationale for the selected price.
- See the Cultivation and Chemical Safety Plans for additional record types related to planting, pruning, propagation, harvesting, and fertilizer and pesticide use.

## Transportation Records

- In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, Jolly Green Inc will retain the following records related specifically to transportation activities:
- Transportation manifests showing all information required by regulating authorities.
- Records showing trip plans and the start and end times of each trip.
- Documentation of approved changes to trip plans.
- Transportation Event Logs of variances between expected and actual trip activities.
- Records of vehicle accidents.
- Records and police reports related to product losses occurring during transportation activities.

## Manufacturing Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to manufacturing activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Chemical Safety Data Sheets.
- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to the disposal of hazardous waste.
- Environmental compliance documentation.
- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Product specifications.
- Sampling and testing specifications and results and other quality assurance documentation.
- Record of identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.
- Record of product complaints and steps taken to resolve issues.
- Adverse event records (related to a negative effect of a product on a user).
- Records relating to product rejections or recalls, including a recall plan.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Janitorial logs relating to sanitation of facilities.
- Documentation of data utilized for setting prices and rationale for the selected price.

## Packaging and Labeling Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically

to packaging and labeling activities: Training records, including type of training offered, date taken, and names of trained employees.

## Dispensary Records

In addition to the records specified in the Business, Security, Inventory Control, and Computing Security Records sections above, [Company] will retain the following records related specifically to dispensary activities:

- Training records, including type of training offered, date taken, and names of trained employees.
- Records required relating to the sale of products to medical patients (if applicable).
- Documentation of data utilized for setting prices and rationale for the selected price.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.

## Other Records

- Records relating to the disposal of product waste, including product UID, description, date of disposal, weight or count of product, reason for disposal, and method of disposal.
- Records relating to weighing devices.
- Equipment manuals and maintenance and inspection logs, including chemicals used for cleaning.
- Record of identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues.
- Records of non-conformance to procedures and reason for variance or steps taken to correct problem.
- Janitorial logs relating to sanitation of facilities.

# Quality Assurance Plan



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# Introduction

Jolly Green Inc is committed to applying a quality management system to all activities carried out in the course of business. The system is designed to ensure that all products sold are in compliance with regulations, are safe for consumption and free of any undesirable components, and provide a beneficial experience for product users.

The quality management system is also designated to evaluate and improve company processes associated with other business activities, including, but not limited to security, recordkeeping, waste management, inventory control, as well as any operations related to production or transportation of the product.

For the purposes of this plan, quality assurance is defined as processes designed to ensure that quality products and services are provided. The Quality Assurance Plan is the primary component of Jolly Green Inc's quality management system, including evaluations of the processes described in this and other operating plans.

Quality control is defined as tasks implemented to ensure the quality of each product and service before it reaches the customer and reporting issues to quality assurance staff such that processes can be improved. Inspections and testing of products and equipment, and specific task procedures to perform these make up the bulk of quality control activities.

Within this plan cannabis/marijuana is referred to as "the product."

Where an "employee" is referred to in this plan, it also includes other individuals involved with Jolly Green Inc, including owners, officers, agents, and others representing the company.

# Roles and Responsibilities

## Quality Assurance Officer

In order to be effective, Quality Assurance Officer (QAO) will be a member of the senior staff, and be involved in the highest level of decision making related to changes to policies and processes, as well as the introduction of new systems, equipment, and products, such that potential quality issues may be identified prior to the implementation of the activity.

1. The QAO will have at a prior experience in quality assurance in a related industry with at least two of those years including supervisory responsibilities.
2. The QAO will be involved in the vetting and selection of new vendors which will be supplying equipment or other materials that will come into contact with the product, including the product itself, [Add to or delete from the following list to match the activities of your company] packaging, chemicals, scales, agricultural supplies, manufacturing equipment, etc.
3. The QAO will be involved in implementing improvements to plans, products, and systems within the company in response to employee, customer, and regulating authority feedback.
4. The QAO will regularly meet with each person responsible for implementing an operating plan and review each item for potential improvement ideas.
5. The QAO will be on the distribution list to receive correspondence and notices from the regulating agencies related to changes in procedures or regulations.
6. When procedures are updated either due to regulation changes or improvements to systems, the QAO will coordinate with managers to update training for employees.
7. The QAO will be responsible for implementing the Recall Plan.
8. The QAO shall stay up to date on quality-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other quality assurance experts.
9. The QAO will maintain updated procedures [describe location here]. Employees will be notified when a new updated procedure is made available.

**The QAO will be forwarded all records related to the following:**

1. OSHA-reportable incidents
2. Emergencies
3. Chemical spills
4. Accidents
5. Non-conformance to procedures by any staff member
6. Inspection or maintenance logs produced outside the purview of the QA team in which problems, repairs, or other issues are documented
7. Product rejections or recalls
8. Product complaints from customers or adverse events and steps taken to resolve issues
9. Internally-identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues
10. Vehicle accidents
11. Product loss, theft, or diversion
12. Changes to procedures

## **Quality Control & 935 CRM 500 sanitary requirements**

Quality Control is a task-driven activity carried out by Managers and Supervisors who are involved in the growth, harvesting, testing, production, and packaging of the product according to written procedures. Various systems, including the inventory control system, checklists, logs, chain of custody forms, and other instruments will be used as engineering controls to prompt employees to adequately monitor the product and the associated environments.

- Jolly Green Inc will insure all marijuana products, will comply with the following sanitary requirements:
- 1. Any employee whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements;
- 2. Any employee or agent working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty

including: Maintaining adequate personal cleanliness; and washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.

- Jolly Green Inc will supply employees with hand-washing facilities that are adequate and convenient. That include running water at a suitable temperature. Hand-washing facilities shall be located in the production areas. Jolly Green Inc will train employees in good sanitary practices. Jolly Green Inc will require employees to wash and sanitize their hands and provide sanitary towel service or suitable drying devices.
- Jolly Green Inc will provide sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations.
- Jolly Green Inc will require litter and waste to be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests.
- Jolly Green Inc will construct floors, walls, and ceilings in such a manner that they may be adequately kept clean and in good repair.
- Jolly Green Inc will insure all contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable.
- Jolly Green Inc will insure all toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products.

- Jolly Green Inc will provide a water supply shall be sufficient for necessary operations. The water supply shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs.
- Jolly Green Inc will provide plumbing of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the Marijuana Establishment. Plumbing shall properly convey sewage and liquid disposable waste from the Marijuana Establishment. There shall be no cross-connections between the potable and waste water lines.
- Jolly Green Inc will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair.
- Jolly Green Inc will provide the storage and transportation of finished products in conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
- Jolly Green Inc shall comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments.
- Jolly Green Inc will insure that no marijuana will be sold for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. The product must be deemed to comply with the standards required under 935 CMR 500.160.

Jolly Green Inc has developed an Adverse Event and Recall plan on found on page 8 of this hand book. The plan responds to laboratory results that indicate contaminate levels above the acceptable limited established DPH protocols 935 CMR 500.160.2

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## Plant Inspection

Employees will inspect the growing plants on a daily and ongoing basis for any signs of nutrient deficiency, pest infestation or damage indicating any sub-optimal conditions. Any problematic symptoms will be reported to the Manager or Supervisor on duty immediately. Problematic symptoms include, at the minimum:

1. Leaves, stems or roots with unusual appearance
2. Stunted growth or discoloration of the plant
3. Unusual resin production quantities
4. Unusual odors
5. Any visible mold, mildew, fungus or other contaminant
6. Insect damage on leaves and stems
7. Visible insects, larvae or eggs on plants
8. Any other visible evidence of deficiency, disease or pests

The Manager is responsible for determining what corrective action, if any, is necessary to correct deficiencies, treat disease or mitigate pests. All treatments will be in accordance with local and state laws and include substances known to be harmless to consumers. The Manager is responsible for determining under what circumstances growing plants should be removed from the cultivation area due to deficiencies, disease, pests or any other factor.

## Equipment Inspection

The Facilities Manager will work with the QAO to conduct regular testing of all cultivation, manufacturing, packaging, and environmental equipment to ensure proper cleanliness and sanitation levels are being maintained and that no known contaminants are present.

Equipment used for cultivation and manufacturing must be in working order and properly used according to the manufacturer's directions.

Personnel will immediately report any damaged, malfunctioning or inoperable equipment to the Manager or Supervisor.

## Sampling and Testing

Representative samples of all materials will be tested for cannabinoid profile and contaminants. The per-batch procedure is as follows:

1. During cultivation: A standard sample size of five (5) grams of plant material is taken from the top, middle and bottom of one plant in each section of the canopy at harvest.
2. During manufacturing: Follow the guidelines provided by the testing laboratory in the selection and preparation of samples.
3. These samples are submitted to identify any unwanted residues and to assure that Cannabinoid and Terpene results are representative of the entire batch. These samples are also utilized for Pesticide and Mold/Microbiological screening to assure that our products meet the highest standards; to be free of pesticide residue, and mold/microbiological counts below thresholds set by the Manager, the American Herbal Pharmacopoeia, and state regulations when applicable.
4. The Manager will determine whether additional testing is necessary.
5. All test results should be recorded in the inventory control system.
6. All paper documents related to testing should be forwarded to the QAO and preserved for future reference, recall, etc., in accordance with the Document Retention and Destruction procedure.
7. Procedures for testing plants and harvested material should conform to the Testing procedure developed by Napro Research for the project.

## Packaging and Labeling

Products that are made available to consumers will be contained in packaging that bears labels containing the following information, in addition to any other information that may be required by law:

1. The name and contact information of the cultivation licensee, manufacturing licensee, and all agents who have handled the product in the chain of custody
2. The weight
3. The quantity of THC, CBD, and any other relevant compounds

4. The date of manufacture or production
5. The expiration date, if applicable
6. A complete list of ingredients if the product contains anything other than natural plant materials.
7. A unique identifier that allows ease of traceability, from seed to sale, in the event of a product recall.

Packaging managers and the QAO will develop engineering controls to ensure that packaging and labeling systems are checked prior to each printing to ensure compliance.

## Adverse Event and Recall Plan

Jolly Green Inc has established a written SOP to receive, evaluate, store and respond to all complaints regarding the product and adverse events. Should Jolly Green Inc receive a complaint, senior managers will promptly evaluate the report to determine if the event constitutes a substantive or serious adverse event (SAE), due to contamination, expiration, or other circumstances that render the product unsafe or unfit for consumption, and make an appropriate response, up to and including recall of the batch.

Jolly Green Inc policy includes 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 must be from both the Marijuana Establishment and the Independent Testing Laboratory, separately and directly. The notification from the Marijuana Establishment must describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination. Jolly Green Inc will maintain the results of all testing for no less than one year. Jolly Green Inc clones are subject to these testing provisions, but are exempt from testing for metals. Jolly green Inc will insure all transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13). Jolly Green Inc will insure all storage of marijuana at a laboratory providing marijuana testing services shall comply with 935 CMR 500.105(11).

The U.S. Food and Drug Administration as any adverse drug experience occurring at any dose that results in any of the following outcomes:

1. Life-threatening
2. Death
3. Hospitalization - initial or prolonged
4. Congenital anomaly/birth defect
5. Disability or permanent damage
6. Required intervention to prevent permanent impairment/damage
7. Other serious events.

## Adverse Event Planning

The QAO will carry out the following activities prior to the distribution products.

1. Maintain records of training for managers and other designated personnel, who will serve as an Adverse Event Team and be responsible for recording and investigating adverse events.
2. Regular employees will be trained to ask a user with a complaint if they wish to report an adverse event, and, if so, immediately bring in a team member to handle adverse event reporting.
3. Develop forms or other documentation controls to be provided to the team to ensure the appropriate information is collected, including an event-specific Adverse Event Log that documents all activities carried out by the Team through the entire process.
4. Ensure that any personal or medical information associated with an individual reporting an adverse event will be protected as sensitive information, stored in a secured location, and disposed of according to the Recordkeeping Plan.
5. Based on guidance provided by the regulating authority, develop a process to determine under what circumstances a reported adverse event will be considered a substantive event or SAE, which will trigger a report to regulating authorities, an investigation, and a possible recall of the product batch.

## Adverse Event Recording & Investigation

Once a user indicates an interest in reporting an adverse event, the Adverse Event Team will immediately begin following the procedure below.

### Information gathering:

1. The contact information for the person who experienced the symptoms
2. The contact information for the person reporting the event, if different than the user

3. The contact information for the doctor or medical facility who treated the user after symptoms appeared
4. Product labeling details
5. Method of administration to user
6. Dose ingested
7. Resulting symptoms
8. Method of storing product after purchase
9. Unusual odors or appearance

**Distribute gathered information** to the QAO and other members of senior management.

**Within 18 hours**, senior managers will apply the process to determine if the reported event is substantive or qualifies as an SAE. If so, the Adverse Event Team will continue with the Adverse Event Recording and Investigation procedure below.

**Notify others as soon as possible.** Note all contacts in the Adverse Event Log. If the contact occurs by phone, the person notified, their contact information, and the date and time of the call will be recorded.

1. Notify the regulating authority of an adverse event by email or telephone immediately, and by written statement within twenty-four hours.
2. Using information from the label, the Senior Cultivation/Production Manager and the Inventory Control Manager will assist the Adverse Event Team in identifying the location of other products from the same batch.
3. If the product was distributed by Jolly Green Inc to other entities, all purchasers that received products from the same batch will be notified by telephone immediately and provided with batch details.
4. If the product was purchased from a vendor, the vendor will be contacted immediately and provided with details from the adverse event report.

**Secure unsold items from the specified batch(es).**

The Team will pull unsold items and store them in a secured location during the investigation.

**Investigate**

1. Review any log or record that may indicate there was a deviation from the SOP in the production of the product.

2. If any deviation or omission of procedure appears to have occurred, the Team will initiate prompt personnel interviews to determine the cause of the deviation.
3. If available, submit two samples from the batch to an independent testing laboratory approved by the department to perform required testing. Jolly Green Inc will request that the testing laboratory perform a comprehensive array of tests to determine if specifications were met including the testing of pesticides, cannabinoid profile, and any other tests that may aid the investigation.
4. Compare against similar complaints, if any, to determine if there is a pattern that may lead to the discovery of a problem that can be corrected.

**Develop a response and notify others.**

1. If the product meets specifications and there is no contamination, a report will be produced by the Team including a description of the investigation and results.
2. The report will be sent to all parties involved in the adverse event process.
3. If the investigation finds that the batch or lot fails to meet specifications, Jolly Green Inc will order a prompt recall, following the plan below.

## Recall Plan

In the event that a product is found to be contaminated, all products derived from or included in the batch will be recalled to minimize risk of further adverse effects.

1. Jolly Green Inc will assemble a list of any batch that could be contaminated.
2. Using the inventory control system, Jolly Green Inc will compile records of all purchasers of the contaminated batch(es).
3. The Adverse Event Team will contact all purchasers and inform them of the serious adverse event, resulting investigation, and provide instructions for returning any unused portion of the recalled product.
4. [Company] will have a list of all purchasers that will be used to authenticate returns or claims for reimbursement, which will be updated upon each reimbursement to ensure there are no duplicate claims.
5. Purchasers of a recalled products will receive store credit or monetary reimbursement, not to exceed the original value of the purchase.
6. Jolly Green Inc will make any information available that may aid other permitted businesses in notifying other relevant entities.
7. Recalled material in the facilities' existing inventory will immediately be placed into a sealed container labeled with "RECALLED MATERIAL". Any returned products will also be placed in the segregated container. These items will be stored in a secured location until disposal.
8. The Inventory Control Manager will update the inventory control system noting the recalled status of each item.
9. Once disposal has been approved, Jolly Green Inc will dispose of recalled products within 24 hours in accordance with the waste disposal SOP and all applicable state and local regulations.
10. The Adverse Event Log will be updated with details of the product disposal.

## Adverse Event Documentation

The Recordkeeping Manager will record, file, and store for five years, or for time period specified by state regulations, all of the following information about all complaints:

1. Forms documenting the original Adverse Event Report.
2. Any records showing non-compliance with procedures.
3. Records recording the results of interviews with employees.
4. Pre and post-event test results on the product batch.
5. Copies of letters or logs showing contact with other companies, customers, and the regulating authority.
6. The final report of conclusions after completion of the investigation.
7. Documentation of the disposal of the contaminated products.
8. The final copy of the Adverse Event Log.

**Diversity Plan**  
**Jolly Green Inc**  
**60 Franklin St Winchendon MA 01475**

**About us:**

Jolly Green was established in 2018 for the purpose of adult use cannabis cultivation and is located at 60 Franklin St. Winchendon Massachusetts, and applying for a tier one cultivation license. Furthermore, within a two-year time frame we are planning on applying for a tier two license for a 2<sup>nd</sup> location at 246 Suffolk Lane at Gardner Massachusetts.

Through the legalization of cannabis this has created an opportunity for many small businesses to come into existence. In doing so establishing well-paying jobs within Massachusetts in the cannabis industry. Currently Jolly Green is startup owner operated company and intends on creating jobs and supporting businesses from areas negatively impacted by the legalization of cannabis.

I feel we have a moral and ethical obligation to society. Thus, Jolly Green will promote equity among the following demographics, minorities, women, veterans, people with disabilities, people of all gender identities and sexual orientations, such as individual's in the LGBTQ + community. This will be done by the following Diversity plan that is outlined.

**Diversity Plan Goals:**

- Jolly Green will Promote equity in its internal business operations. By increasing the number of individuals falling into the above-listed demographics working in our establishment and providing tools to ensure their success. Our plan is to hire 1 # individual per year from the above listed demographics.
- Jolly Green will promote equity in its external business operations. By using 50% or more vendors owned by individuals falling into the listed demographics. Women, veterans, people with disabilities, people of all gender identities and sexual orientations, such as individual's in the LGBTQ + community.

## **Programs:**

### **Promoting equity within Jolly Green internal business operations:**

- Jolly green will promote equity among employees by creating an equity hiring process. This process will include Jolly Green attending Equity Opportunity Career Fairs to attract potential employees. The career fairs will be marketed directly to diverse individuals. Jolly Green plans to attend 2 # job fairs per year.

### **Promoting equity within Jolly Green external business operations:**

- Jolly Green will create economic opportunity for diverse individuals. The State Massachusetts offers a program through the Supplier Diversity Office that Jolly Green will use. By utilizing this tool, we will research and establish business relationships with diverse businesses owners in Massachusetts. Jolly Green intends on hiring 50% or more of its vendors from the following listed demographics. Women, veterans, people with disabilities, people of all gender identities and sexual orientations, such as individual's in the LGBTQ + community.

## **Measurements and accountability:**

- **Program #1**  
Employee equity program, Jolly Green compliance management will review and perform annual audit to ensure progress towards diversity goals. Jolly Green will attend Equity

opportunity Career Fairs marketed directly to diverse individuals. Jolly Green intends on employing 1 # or more diverse individuals over the first year. Jolly Green will count the number of individuals hired annually. This will be done to ensure we meet our goal of hiring 1 # individual from the above listed demographics. The process will commence 60 days after obtaining provisional license.

- **Program #2**

Vendor and contractor equity program, Jolly Green compliance management will review and perform audit one time a year to ensure progress towards vendor and contractor diversity goals. Jolly Green will use the Massachusetts Supplier Diversity Office program to procure vendors and contracts with diverse business owners. Jolly Green intends on hiring and contracting with 50% or more companies utilizing this program. Jolly Green will count the number of vendors who have been hired annually. This will be done to ensure we meet our goal of hiring 50% of our vendors are owned by the above listed demographics. The process will commence 60 days after obtaining provisional license.

**Jolly Green Inc required acknowledgements:**

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

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