



Massachusetts Cannabis Control Commission

Marijuana Cultivator

General Information:

License Number: MC281313
Original Issued Date: 10/15/2019
Issued Date: 08/12/2021
Expiration Date: 10/15/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: JustinCredible Cultivation, LLC

Phone Number: 301-885-9159 Email Address: justin@jccultivation.com

Business Address 1: 116 powell road

Business Address 2:

Business City: cummington

Business State: MA

Business Zip Code: 01026

Mailing Address 1: 116 powell road

Mailing Address 2:

Mailing City: cummington

Mailing State: MA

Mailing Zip Code: 01026

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Lesbian, Gay, Bisexual, and Transgender Owned Business, Minority-Owned Business, Veteran-Owned Business

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: 22.7

Percentage Of Control: 50

Role: Owner / Partner

Other Role: Executive

First Name: Reginald

Last Name: Stanfield

Suffix: 2nd

Gender: Male User Defined Gender:

What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali), Middle Eastern or North African (Lebanese, Iranian, Egyptian, Syrian, Moroccan, Algerian), American Indian or Alaska Native

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 17 Percentage Of Control: 10

Role: Owner / Partner Other Role:

First Name: Terrance Last Name: Hanley Suffix:

Gender: Male User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 4.5 Percentage Of Control: 25

Role: Executive / Officer Other Role:

First Name: Chet'toia Last Name: Walker Suffix: 3rd

Gender: Female User Defined Gender:

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

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: 4.5 Percentage Of Control: 10

Role: Executive / Officer Other Role:

First Name: Jonathan Last Name: Siberon Suffix:

Gender: Male User Defined Gender:

What is this person's race or ethnicity?: Hispanic, Latino, or Spanish (Mexican or Mexican American, Puerto Rican, Cuban, Salvadoran, Dominican, Colombian)

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: Percentage of Ownership: 28

Entity Legal Name: AURORA BOREALIS OF W. MASS CORP. Entity DBA: DBA City: Northampton

Entity Description: Corporation

Foreign Subsidiary Narrative:

Entity Phone: Entity Email: Entity Website: n/a

Entity Address 1: Entity Address 2:

Entity City: Entity State: Entity Zip Code:

Entity Mailing Address 1: Entity Mailing Address 2:

Entity Mailing City: Entity Mailing State: Entity Mailing Zip Code:

Relationship Description: Corporation in an investor and consultant to Marijuana Establishment.

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Chederis	Last Name: Polanco	Suffix:	
Types of Capital: Monetary/ Equity	Other Type of Capital: Cash	Total Value of the Capital Provided: \$120000	Percentage of Initial Capital: 20
Capital Attestation: Yes			

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: AURORA BOREALIS OF W. MASS CORP.		Entity DBA:	
Email: smtswaz@comcast.net	Phone: 413-537-4812		
Address 1: 31 Henry St		Address 2:	
City: Northampton	State: MA	Zip Code: 01060	
Types of Capital: Monetary/ Equity	Other Type of Capital:	Total Value of Capital Provided: \$101500	Percentage of Initial Capital: 29
Capital Attestation: Yes			

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 116 Powell RD

Establishment Address 2:

Establishment City: Cummington

Establishment Zip Code: 01026

Approximate square footage of the Establishment: 2000

How many abutters does this property have?: 5

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 Community Agreement	Aug 22, Doc 1.pdf	pdf	5b7e0b4b0d95792d85f42b43	08/22/2018
Community Outreach Meeting Documentation	MarijuanaMtg.pdf	pdf	5b7e107e4e62492d8f3448ab	08/22/2018

Certification of Host Community Agreement	Community Outreach.pdf	pdf	5b7e11ee377423394139410c	08/22/2018
Community Outreach Meeting Documentation	List of Abutters.pdf	pdf	5b7e11ff8d67cc394b81ba16	08/22/2018
Community Outreach Meeting Documentation	Town of Cummington Newspaper Clipping.pdf	pdf	5bdb4fc6bcbac00d7d74a72c	11/01/2018
Plan to Remain Compliant with Local Zoning	Municipality Compliance Plan - JCC.pdf	pdf	5bdb4fda6906170d879382cb	11/01/2018

Total amount of financial benefits accruing to the municipality as a result of the host community agreement. If the total amount is zero, please enter zero and provide documentation explaining this number.: \$1

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive Impact 052819.pdf	pdf	5ced582f69291617ba85e2a4	05/28/2019

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Other Role:
 First Name: Reginald Last Name: Stanfield Suffix: 2ND
 RMD Association: Not associated with an RMD
 Background Question: yes

Individual Background Information 2

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

Individual Background Information 3

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

Individual Background Information 4

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

Individual Background Information 5

Role: Other Role:

First Name: Chederis Last Name: Polanco Suffix:

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Investor/Contributor

Other Role:

Entity Legal Name: Aurora Borealis of W. Mass Corp

Entity DBA:

Entity Description: Corporation

Phone: 413-537-4812

Email: smtswaz@COMCAST.NET

Primary Business Address 1: 31 Henry St

Primary Business Address 2:

Primary Business City: Northampton

Primary Business State: MA Principal Business Zip Code: 01060

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Bylaws	By laws.pdf	pdf	5b7e32f15e9b3d2d528a7a42	08/23/2018
Articles of Organization	JCC Certificate of Corporations.pdf	pdf	5b7ee96eb60ce4391d87ed36	08/23/2018
Department of Revenue - Certificate of Good standing	certificate of good standing.pdf	pdf	5b8713d0185bb22d71066706	08/29/2018
Secretary of Commonwealth - Certificate of Good Standing	Certificate good standing Sec..pdf	pdf	5b871430d389b22d7bd64531	08/29/2018

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Unemployment Assistance - Certificate of Good standing	Memo_DUA.pdf	pdf	5f403df17116b407de654245	08/21/2020
Secretary of Commonwealth - Certificate of Good Standing	letter of good standing.pdf	pdf	60db70af7a4b3b034a67e05a	06/29/2021
Department of Revenue - Certificate of Good standing	revenue certificate.pdf	pdf	60e37c9084f3fe0296c40599	07/05/2021

Massachusetts Business Identification Number: 001342765

Doing-Business-As Name: JustinCredible Cultivation, LLC

DBA Registration City: Cummington

BUSINESS PLAN

No documents uploaded

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
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Restricting Access to age 21 and older	Restriction of Age.pdf	pdf	5b7f393689bc002d9918ac41	08/23/2018
Transportation of marijuana	Transportation Procedures.pdf	pdf	5b7f48b589bc002d9918ac4d	08/23/2018
Policies and Procedures for cultivating.	Cultivation Plan-converted.pdf	pdf	5bdb4bf7e18f9d0d7384fac5	11/01/2018
Security plan	Security plan - JCC.pdf	pdf	5bdb4c0ebcbac00d7d74a720	11/01/2018
Prevention of diversion	Prevention of Diverson - JCC.pdf	pdf	5bdb4c1e6906170d879382bf	11/01/2018
Storage of marijuana	Cultivation Facility Storage Plan - JCC.pdf	pdf	5bdb4c31813a010d917abfc3	11/01/2018
Inventory procedures	Inverntory Plan.pdf	pdf	5bdb4c534287b10d4f36e802	11/01/2018
Personnel policies including background checks	Personnel policy JCC.pdf	pdf	5bdb4c91fe03b20d5f6942a7	11/01/2018
Record Keeping procedures	Record Keeping Compliance Plan - JCC.pdf	pdf	5bdb4cc64088250d697fc958	11/01/2018
Maintaining of financial records	Maintenance of Financial Records Compliance Plan - JCC.pdf	pdf	5bdb4cd1e18f9d0d7384fac9	11/01/2018
Diversity plan	JustinCredible Cultivation Women's Fund Pledge Document signed.pdf	pdf	5cb77bd38e20fa4c3aba66ca	04/17/2019
Qualifications and training	Qualifications and Trainings_2021.pdf	pdf	60e5de01504b25036f755bf5	07/07/2021
Diversity plan	Diversity Plan_2021 (2).pdf	pdf	60e9e8553678b8028bd4412a	07/10/2021
Policies and Procedures for cultivating.	Cultivation Plan_draft.pdf	pdf	60e9e9680bb484027d8be3d2	07/10/2021
Energy Compliance Plan	Energy Compliance.pdf	pdf	60ea06a023f3f9033f376115	07/10/2021
Personnel policies including background checks	Background Check Policy.pdf	pdf	60ea0da2308c7a02a1ffed7f	07/10/2021

ATTESTATIONS

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

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

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

Notification: I 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: JCC, Has made not had the opportunity to make financial progress with our Positive Impact Plan. Covid-19 halted the inspection process on 03/16/2020 the day of our post provisional inspection. We received our inspection on July 7, 2020. Since being rewarded our license our company has been severely underfunded and financially affected by the shutdown of the industry during Covid. Making it impossible to place revenue into any other areas besides operations of the company.

Even though our company has not been able to monetary help those affected, our CEO has personally mentored and extended help to Economic Empowerment Applicants seeking to gain licenses. Working with companies such as Naked Nature, Blaze Transport, Eagle Eye Transport, Major Bloom, Rolling Leaf, Freshly Baked, Your Green Package, We can deliver, Rebelle (CGP group), Six Bricks and many more we have built relationships that will help minority-owned/economic empowerment companies thrive in this industry.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: In our first year we have hired 5 women and contracted with 2 women owned businesses. Our C-Suite is made up of 50% black women and we are actively building our team However being located in Cummington, Ma has made it challenging finding eligible employees. We have relocated individuals and paid for housing.

HOURS OF OPERATION


Monday From: Open 24 Hours	Monday To: Open 24 Hours
Tuesday From: Open 24 Hours	Tuesday To: Open 24 Hours
Wednesday From: Open 24 Hours	Wednesday To: Open 24 Hours
Thursday From: Open 24 Hours	Thursday To: Open 24 Hours
Friday From: Open 24 Hours	Friday To: Open 24 Hours
Saturday From: Open 24 Hours	Saturday To: Open 24 Hours
Sunday From: Open 24 Hours	Sunday To: Open 24 Hours

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, Reynold Stanfield, (insert name) certify as an authorized representative of Just a Credible Cultivation (insert name of applicant) that the applicant has executed a host community agreement with Cummington (insert name of host community) pursuant to G.L.c. 94G § 3(d) on May 17, 2018 (insert date).


Signature of Authorized Representative of Applicant

Host Community

I, Russell 2 Sears, (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for Cummington (insert name of host community) to certify that the applicant and Cummington (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 5-17-18 (insert date).

Russell 2 Sears
Signature of Contracting Authority or
Authorized Representative of Host Community



Cummington, Massachusetts 01026

NOTICE

CUMMINGTON PLANNING BOARD

FOR

COMMUNITY OUTREACH MEETING

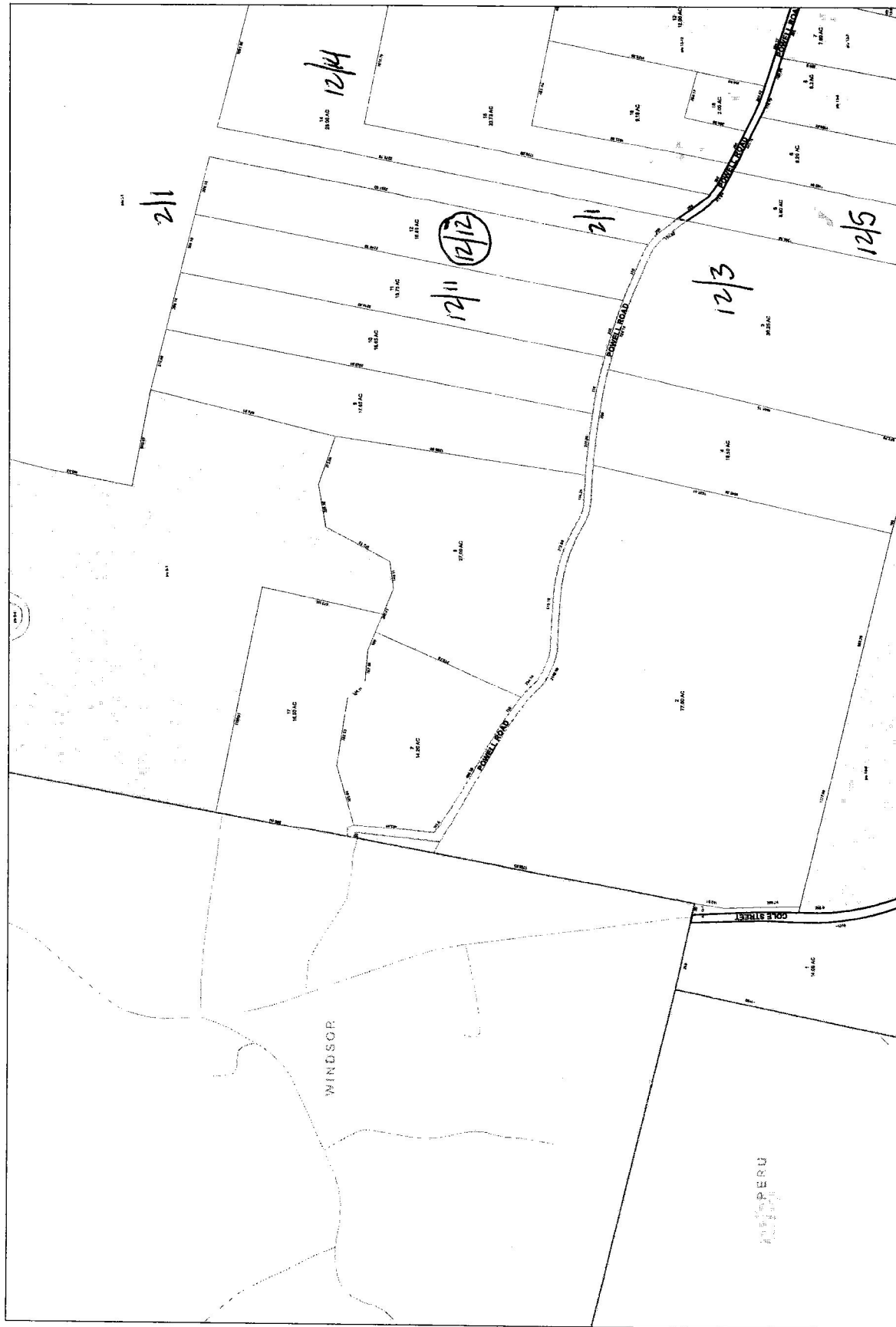
REGARDING MARIJUANA CULTIVATION FACILITY ON POWELL ROAD – ASSESSOR MAP 12 LOT 12

WHEN: JUNE 29, 2018

TIME: 7:00 P.M.

PLACE: Community House, 33 Main Street

6/18/2018



Map Number
12

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
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- Parcel Boundary
- Right of Way
- Non-Adjoined / Discontinued Road
- Map Boundary
- Town Boundary
- Adjacent Map Parcel
- Building
- Water (MainGIS)
- Stream (MainGIS)

Tax Map
Town of Cummington
Massachusetts
Prepared by MainStreetGIS, LLC



This map is for assessment purposes only
and is not valid for legal description or conveyance.
Mapping is current through July 1, 2017.
Publication Date: 5/9/2018

MainStreetGIS
MainStreetGIS, LLC
www.mainsstreetgis.com

Edited Parcel

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, Reginald Stanfield, (insert name) attest as an authorized representative of Sustainable Cultivation (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 June 29, 2018 (insert date).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on June 21, 2018 (insert date), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on June 21 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 June 15, 2018 (insert date), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

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



TOWN OF CUMMINGTON

www.cummington-ma.gov

Board of Assessors

33 Main St, P.O. Box 74

Cummington, MA 01026

413-200-5010

boa@cummington-ma.gov

June 15, 2018

List of abutters for 0 Powell Rd, Map 12, Lot 12, 300' buffer distance.

Map 12, Lot 3 0 Powell Rd	Young Kim Westort, c/o Michael Westort 24 Main St, Montague, MA 01351
Map 12, Lot 5 233 Powell Rd	Kathy A McMahon 233 Powell Rd, Cummington, MA 01026
Map 12, Lot 11 0 Powell Rd	George Hoyer, Shannon K Hoyer & Stephen Hoyer 357 East Miami St, West Springfield, MA 01089
Map 12, Lot 14 0 Powell Rd	Bryna Greenspan & Tammy J Reid 234 Powell Rd, Cummington, MA 01026
Map 2, Lot 1 0 Berkshire Trail	Commonwealth of Massachusetts Department of Environmental Management 100 Cambridge St, Boston, MA 02204

Sincerely,

Joy Johns, Assessor/Clerk

Classifieds

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(413)330-3917

MASONRY

ABC MASONRY & BASEMENT
WATERPROOFING All brick, block,
stone, concrete. Hatchway doors,
basement windows, chimneys rebuilt &

OBITUARY

Bradley D. Brisebois

Bradley D. Brisebois, 29, a landscaper for Exquisite Properties Lawn Care in Easthampton, passed away on Wednesday, June 13, at Cooley Dickinson Hospital in Northampton. He was born in Springfield on Jan. 27, 1989. He lived in Easthampton for the past three and a half years coming from South Carolina, Springfield and lived many years in South Hadley. He attended Gateway Regional High School. He leaves his father, Daniel L. Brisebois and his wife Nancy of Vernon, Conn.; his mother, Tracy L. Webb of Springfield; a daughter, Catherine M. Brisebois of Beaufort, S.C.; a sister, Sandra D.

Brisebois and her fiancé Michael R. Wissman, and a half sister, Stephanie Webb of Springfield. Bradley leaves his significant other, Kathryn M. Crossman of Easthampton. He leaves many aunts, uncles, nieces and nephews. He also leaves his stepbrother and step-sister, Elijah and Leah Fournier. Calling hours will be held on Saturday, June 23 from 1 p.m. to 3 p.m. at the O'Brien Hilltown Funeral Home, 27 Russell Road, Huntington, followed by a service funeral service at 3 p.m. Donations may be made to <https://www.gofund-me.com/easing-the-burden-of-bills> to help with the expenses.

DEATH NOTICE

BRISEBOIS, BRADLEY D.

Died June 13
Funeral Services June 23
O'Brien Hilltown Funeral Home

Country Journal OBITUARY POLICY

Turley Publications offers two types of obituaries.

One is a free, brief **Death Notice** listing the name of deceased, date of death and funeral date and place.

The other is a **Paid Obituary**, costing \$75, which allows families to publish extended death notice information of their own choice and may include a photograph. **Death Notices & Paid Obituaries** should be submitted through a funeral home to: obits@turley.com.

Exceptions will be made only when the family provides a death certificate and must be pre-paid.

PUBLIC NOTICES

TOWN OF BLANDFORD PLANNING BOARD PUBLIC HEARING NOTICE

The Blandford Planning Board will be holding a Public Hearing on **July 11, 2018 at 7:15 PM** in the Town Hall (Selectmen's Office), 1 Russell Stage Road Blandford, MA to consider the application of Sunpin Solar Development, LLC, 1901 Main Street, Suite 150, Irvine, CA 92614 for a Site Plan Approval as required under the following sections of the Blandford Zoning Bylaw:

- Section VIII - Large Scale Ground Mounted Solar Photovoltaic Installations
- Section IX - Site Plan Review

The applicant proposes to install a 4.23 MW large scale ground mounted solar photovoltaic (PV) facility on an approximately 21.4 acre portion (clearing 40.19 acres) of the approximately 186 acre parcel of land located off of the south side of Otis Stage Rd. (Assessor's Map Lot 402-0-43) owned by Philip Brent of Encino CA which is located within the Agricultural (AG) Zoning District.

The complete application

Hall lobby during regular business hours (8:00a.m.-7:00p.m.), at the Porter Memorial Library, 87 Main St. Blandford, MA and on the town's website at <http://town-ofblandford.com/>.

Anyone wishing information and/or to be heard on this matter should appear at the time and place designated.

Richard Barnard, Chair
Blandford Planning Board
6/21, 6/28/18

CUMMINGTON PLANNING BOARD FOR COMMUNITY OUTREACH MEETING

R E G A R D I N G
MARIJUANA CULTIVATION
FACILITY ON POWELL
ROAD, Assessor Map 12 Lot 12.

Date: **June 29, 2018**
Time: **7:00 P.M.**
Place: **Community House**
33 Main Street

6/21/18

NOTICE OF PUBLIC HEARING RUSSELL PLANNING BOARD

Notice is hereby given

the Town of Russell Zoning By-Law that the Russell Planning Board will hold a public hearing on **Tuesday, July 10, 2018** during a public meeting that begins at **6 P.M.** at Russell Town Hall, 65 Main Street, Russell MA. The public hearing relates to GE Solar's application for site plan approval for a solar ground mount installation on the existing landfill located at 52 Station Road. The specific property location is Town of Russell Parcel 17-6-1. The application and plans for this project are on file at Russell Town Hall and are available for public review.
6/21, 6/28/18

TOWN OF WILLIAMSBURG Office of the Zoning Board of Appeals Planning Board LEGAL NOTICE

A Public Hearing will be held at **6:00 PM on Monday, July 9, 2018** in the Williamsburg Town Offices, 141 Main St., Haydenville, MA to consider the following: The application of Daniel Bonham & JKC Properties, LLC of Williamsburg, MA for a Special Permit, as required

Town of Williamsburg, to permit a change of use by converting existing structure to four (4) residential units on a non-conforming lot at 14 Kingsley Ave., Williamsburg identified as Assessors Map K, Lot 80.0.

Charles Dudek, Chairman
Zoning Board of Appeals
6/21, 6/28/18

Please check the accuracy of your legal notice prior to submission (i.e., date, time, spelling). Also, be sure the requested publication date coincides with the purpose of the notice, or as the law demands.

HOW TO SUBMIT PUBLIC NOTICES

All legal notices to be published in the *Country Journal* should be sent directly to notices@turley.com. Jamie Joslyn processes all legal notices for this newspaper and can answer all of your questions regarding these notices. Please indicate the newspapers and publication date(s) for the notice(s) in the subject line of your email. For questions regarding coverage area, procedures or cost, please call Jamie directly at 413-283-8393.

Turley Publications, Inc. publishes 14 weekly newspapers throughout Western Massachusetts. Visit www.turley.com for more information.

Municipality Compliance Plan

The top priorities for JustinCredible Cultivation (JCC) are public safety and creating positive impact within the community. To accomplish this, JCC has established operational systems that ensure best practices are consistently followed and compliance expectations are met.

Compliance Plan Goal

Short Term Goals (within 2 years)

1. Meet all necessary satisfaction of the towns planning board

Long Term Goals (within 5 years)

1. JCC will ensure compliance with local codes, ordinances, and bylaws of the municipality as well as local licensing requirements for the adult use of marijuana as defined by the town of Cummington, Massachusetts.
2. Stay current and help with any changes the town may consider to control cannabis in the town of Cummington
3. Receive zero notices or fines by the town if Cummington for knowledgeable cannabis infractions

Program Policy & Procedures

- **Research:** JCC will research the Town of Cummington's codes, ordinances, and bylaws of the municipality as well as local licensing requirements for the adult use of marijuana once per month for any updates, amendments, and changes. As these bylaws frequently change, it is imperative that compliance is maintained as soon as the changes to information is made available.
- **Execution:** Once updates, amendments, and changes are found from the research the Town of Cummington, communication with the city will be made to confirm said updates, amendments, and changes. Once confirmed, JCC will hire the necessary contractors approved by the city of Cummington to make the changes to the establishment in order to remain within the codes, ordinances, and bylaws of the municipality as well as local licensing requirements for the adult use of marijuana within 30 days of confirmation.
- **Record Management:** JCC will maintain updated codes, ordinances, and bylaws of the municipality as well as local licensing requirements for the adult use of marijuana in a lock safe file system within the office of the establishment under 24/7 video surveillance. As updates, amendments, and changes are confirmed, old records will immediately be discarded and the newest versions will then replace the outdated versions.
- **City Meetings:** JCC will sit in on all meetings held by the municipality in regards to all codes, ordinances, and bylaws as well as local licensing requirements for the adult use of marijuana as

an added measure to maintain compliance as soon as any updates, amendments, and changes are found from the Town of Cummington.

- **Training:** Agent training will be mandatory to designated employees to understand and be efficient with researching the Town of Cummington's codes, ordinances, bylaws, and city meetings as well as local licensing requirements for the adult use of marijuana in order to remain compliant.

Measurement & Accountability

1. An annual inspection from city approved inspector will be held to ensure establishment compliance.
2. Upon completion of work of confirmed updates, amendments, and changes found from the research the Town of Cummington, an inspection will be performed to verify current compliance of all codes, ordinances, and bylaws as well as local licensing requirements for the adult use of marijuana.
3. An internal audit for all codes, ordinances, and bylaws as well as local licensing requirements for the adult use of marijuana paperwork and records will take place bi-annually to sustain order and organization for efficient record keeping.



Memorandum

To: Massachusetts Cannabis Control Commission

From: Reginald Stanfield c/o JustinCredible Cultivation, LLC

Subject: Municipality Costs

In efforts to satisfy license renewal requirements pursuant to 935 CMR 500.103 Licensure Renewal, this memo is to bring notice to the fact that JustinCredible Cultivation has been unable to make contributions to the town of Cummington, MA because the costs have not been properly defined.

JCC has made several attempts in contacting the Town of Cummington's Town Clerk and Selectman Board with no definitive information on the impact fees and the amounts owed to operate in the town of Cummington. Last correspondence with Monica Vandoloski, Town Clerk, on July 5, 2021 stated that she had no information so far from the town officials regarding what the 3% impact fee will be.

It is in our best intentions, that when this information is received, to carry out our financial responsibility as quickly and efficiently as possible.

JCC will adhere to the requirements set forth in 935 CMR 500.105 which provides the authorized operational practices of every Marijuana Establishment. Any and all actions taken, or programs instituted by the JCC will not violate the Massachusetts Cannabis Control Commission's (CCC) regulations with respect to limitations on ownership or control or other applicable state laws.

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

In accordance with 935 CMR 500.101(1)(c)(7)(k); JustinCredible Cultivation, LLC (JCC) has developed short term and long-term plans to positively impact the area of Pittsfield Massachusetts that will increase the opportunities inside the cannabis industry for those individuals who identify as an individual from the areas outlined by the CCC

Goals

1. Become one of the select few minority companies that will open a cannabis-based business – Completing this goal will help areas of disproportionate impact by giving the communities that have been effected by cannabis laws a company that is ran and managed by people of the same background, attracting more individuals who may feel as though upper management may not be able to provide them with a comfortable work environment if upper management is comprised of individuals whom are not minorities.
2. Organize and track events that may profit from cannabis business participation in Pittsfield, Massachusetts. For example, there are businesses that provide services that a cultivator may need, such as cleaning, accounting services or lawyers. By tracking these businesses our company can partner with said businesses. By providing income to businesses in areas of disproportionated it will help raises jobs and opportunities to those residents.
3. JCC Donations - JCC will partner with Women's Fund as a corporate underwriter. The Women's Fund is a nonprofit organization focused on providing women with the necessary tools to climb corporate ladders and manage companies from a high-level. JCC will establish a relationship with Women's Fund and its CEO Donna Haghighat, to understand her chapter of the Women's Fund process of helping women in the area of Pittsfield and begin our process of giving back to the community through women's Fund. JCC will donate 1% of our annual sales. The Women's fund is a non-profit company that has multiple chapters, after speaking with the CEO of the chapter located in Pittsfield, we are ensured that their efforts are focused and geared towards women that are in the areas of Pittsfield, Springfield and Holyoke. By donating exclusively to this chapter, we will be providing financial support and help to a non profit that in geared towards the improvement of women specifically in the areas of Pittsfield.
4. Provide business plan support for those who have knowledge of cannabis, but lack knowledge of how to start a business. This support can include, investor attraction, strategic planning, equipment research support, (defining the difference between what you need and overpriced quotes), paperwork review and filing (we provide support on

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

how to become licensed and understand the process, what to expect, and assistance as requested) –

5. Provide an annual scholarship to an entrepreneur or individual seeking to help develop their community through positive business practices. We are seeking to donate \$10,000 dollars, as a scholarship to an individual whom is a resident of Pittsfield, Springfield or Holyoke. Individuals must be over 21 years of age and is seeking to further their education.

Programs

JCC Meets the Community- no cannabis, or cannabis related advertising, sponsoring or promotion will take place at any event. JCC will follow all guidelines and regulations mandated by the 935 CMR 500

This program will assist in building a significant amount of the structure needed to positively affect the area of Pittsfield, Massachusetts. Businesses donate and give funds to areas and, perhaps create jobs, however JCC leadership has a personal responsibility in how it influences these areas, because knowing the community it is based in is important;

1. Job fairs – JCC will actively seek applicants from fairs that are hosted in the Pittsfield area. Since promotion and advertising is prohibited, JCC will assign a member of our management team to attend these events and interact with individuals looking for opportunities. The team member will not be dressed or wearing any JCC apparel. This will give us insight on businesses seeking to help individuals, and what type of programs, jobs and educations individuals of these areas find attractive.
2. Community days – Most towns have days where they celebrate their community and give opportunities for businesses to sell and display their work. During these days, JCC will host at least one (1) job fair every six months starting the 2nd fiscal year, as the start of fiscal year allows. We will capitalize on these opportunities by giving out information (non-cannabis related, and regulation compliant), and show examples of successful minority owned businesses. This will allow the introduction of JCC to individuals that are seeking opportunities to enter into entrepreneurship. We will go to community days within communities that are designated as areas of disproportionate impact. During these community days, no cannabis related, or JCC related materials will be advertised or marketed to the public. These events will be used as informational experience only.

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

JCC Interns and Mentorship:

This program will positively impact the communities of Pittsfield, Massachusetts. Our leadership (from a minority perspective) understands the lack of interns and mentorships effect on the adults in these communities. Individuals who meet the age requirements, 21 or older, will be given the opportunity to be mentored by either our owners or senior staff. Hands on training can easily spark the desire to own or become a cannabis professional. JCC plans to target these potential intern/mentees by building relationships with local colleges, and universities, and setting up a program through their respective career development departments to uplift and provide opportunities to the young leaders of the future who meet the age requirements as set forth in 935 CMR 500.105(4), without using advertising or marketing tools.

Measurement & Accountability

Accountability for social responsibilities is extremely important. Planning and executing are two sides of the coin that sometimes do not come together in big corporation and business. We will hold our owners and managers to these standards by doing the following;

- Owners will have regularly scheduled programs to develop a “check and balance” system of goals and their completion. Some programs may face obstacles as the cannabis industry is constantly changing. All goals require completion prior to the end of the owners expected term as an officer of JCC.
- Our owners must attend one (1) event per quarter which benefits an area of disproportionate impact. It will rise and double every year until all goals are meet. This applies pressure and gives an opportunity to work on goals and learn how the community views the effects of cannabis first hand from residents of areas of disproportionate impact.
- Our CEO’s must partner and support the start-up of a retail or manufactured cannabis business within the first three (3) years of the company’s life. We will invest in and fund start-ups created by individuals whom are residents of areas of disproportionate impact. If JCC has not grown to the point of financial support, support will be provided by advising on application processes and business practices. This includes registering a business or the general skills required to register a business independently. Data will be provided on the success of these businesses.
- All plans and programs shall be reviewed and audited to assess plans, progress, and

PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

success, and shall be prepared for submission to the Commission annually.

JCC 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 and all actions taken, or programs instituted, by the JCC will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

BYLAW
S OF
JustinCredible Cultivation, LLC, a
Massachusetts Limited Liability
Company

ARTICLE I

Shareholders

Section 1.1. **Annual Meetings.** An annual meeting of shareholders of JustinCredible Cultivation, LLC (the “Company”) shall be held for the election of directors on a date and at a time and place either within or without the state of Massachusetts fixed by resolution of the Board of Directors (sometimes referred to as the “Board”). Any other proper business may be transacted at the annual meeting. Annual meetings must be held in person with all members present. There will be one in-person meeting held in either the month of January or December, at the Board’s discretion.

Section 1.2. **Mandatory Meetings.** Mandatory shareholder meetings will be set as the following:

- One annual in-person meeting
- Twelve video conferences
- Twenty-four teleconferences

Section 1.3. **Special Meetings.** Special meetings of the shareholders may be called at any time by the Board of Directors or by the holders of not less than 10% of the outstanding shares entitled to vote at any meeting of the shareholders if such holder(s) sign, date and deliver to the Secretary of the Company written demands for the meeting describing the purpose for which it is to be held. Special meetings will be held at the date, time and place either within or without the state of Massachusetts as may be stated in the notice of the meeting. Business transacted at any special meeting of the shareholders shall be limited to the purposes stated in the notice.

Section 1.4. **Notice of Meetings.** Whenever shareholders are required or permitted to take any action at a meeting, a written notice of the meeting shall be given not less than 10 nor more than 60 days before the date of the meeting to each shareholder entitled to vote at the meeting. Such notice shall state the place, date and hour of the meeting, and (i) in the case of a special meeting, the general nature of the business to be transacted, and no other business may be transacted, or (ii) in the case of the annual meeting, those matters which the Board of Directors, at the time of the mailing of the notice, intends to present for action by the shareholders. The notice of any meeting at which directors are to be elected shall include a list of the names of the nominees intended at the time of the mailing of the notice to be presented by the Board of Directors for election.

Notice of a shareholders’ meeting or any report shall 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 Company or given by the shareholder to the Company for the purpose of notice. The notice shall be deemed as “given” at the time when delivered personally or deposited in the mail or sent by other means of written communication.

Section 1.5. **Adjournments.** When a shareholders’ meeting is adjourned to another time

or place, except as otherwise provided in this Section 1.5, 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 Company may transact any business which might have been transacted at the original meeting. If the adjournment is for more than 120 days after the date of the original meeting, a new record date must be fixed for the adjourned meeting, and a notice of the adjourned meeting shall be given to each shareholder of record entitled to vote at the meeting.

Section 1.6. 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 Company Act.

Section 1.7. 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 1.7.

Section 1.8. Organization. Meetings of shareholders shall be presided over by the Chairperson of the Board of Directors, if any, or in the absence of the Chairperson of the Board of Directors by the Vice Chairperson of the Board of Directors, if any, or in the absence of the Vice Chairperson of the Board of Directors by the President, or in the absence of the foregoing persons by a chairperson designated by the Board of Directors, or in the absence of such designation by a chairperson 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 chairperson of the meeting may appoint any person to act as secretary of the meeting.

Section 1.9. Voting. Unless otherwise provided in the articles of Company of the Company, as may be amended from time to time (the "Articles of Company"), each outstanding share, regardless of class, shall be entitled to one vote on each matter submitted to a vote of shareholders. The President holds the tie breaking vote on all hung votes and must be the final vote tallied.

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.

Except as otherwise provided in the Articles of Company and subject to the Massachusetts Business Company Act, directors are elected by a plurality of the votes. Each shareholder who is entitled to vote at an election of directors has the right to vote the number of shares owned by him or her for as many persons as there are directors to be elected and for whose election the shareholder has a right to vote. Shareholders do not have a right to cumulate their votes for directors unless the Articles of Company so provide.

In all other matters, unless otherwise provided by the Massachusetts Business Company Act, the Articles of Company or the bylaws of the Company, as may be amended from time to time (the "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 Massachusetts Business Company Act, the Articles of Company or the Bylaws.

Section 1.10. 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 Company 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 expressly 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 1.10. Such revocation may be affected by a writing delivered to the Company stating that the proxy is revoked; by a subsequent proxy that is executed by the person who executed the prior proxy and presented to the meeting; or by voting in person by the person executing the proxy.

Section 1.11. 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 1.12. Fixing Date for Determination of Shareholders of Record. In order that the Company 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 70 days before the meeting or action requiring a determination of the shareholders.

If no record date is fixed: (i) 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 before 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; (ii) 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 (iii) 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 unless the Board of Directors sets a new record date.

Section 1.13. Consent of Shareholders in Lieu of Meeting. Unless otherwise provided in the Articles of Company, any action which may be taken at any annual or special meeting of the shareholders may be taken without a meeting and without prior notice if a consent in writing, setting forth the action so taken, is dated and signed by the holders of outstanding shares having at least the minimum number of votes that would be necessary to authorize or take such action at a meeting. No written consent shall be effective to take the corporate action referred to therein unless, within 60 days of the date of the earliest dated consent delivered in the manner required by this Section 1.13, written consents signed by the number of shareholders required to take action are delivered to the Company by delivery to its principal office in the state of Massachusetts, its principal place of business, the corporate secretary, or another officer or agent of the Company having custody of the book in which proceedings of meetings of shareholders are recorded. Any written consent may be revoked prior to the date that the Company receives the required number of consents to authorize the proposed action. No revocation is effective unless in writing and until received by the Company at its principal office.

Within 10 days after obtaining authorization by written consent, notice must be given to those shareholders who have not consented in writing or who were not entitled to vote on the action. The notice shall fairly summarize the material features of the authorized action. If the action causes dissenters' rights to be provided under the Massachusetts Business Company Act, the notice shall contain a clear statement of the right of shareholders dissenting therefrom to be paid the fair value of their shares upon compliance with further provisions of the Massachusetts Business Company Act regarding the rights of dissenting shareholders.

ARTICLE II

Board of Directors

Section 2.1. Powers; Number; Qualifications. The business and affairs of the Company shall be managed by, and all corporate powers shall be exercised by or under, the direction of the Board of Directors, except as otherwise provided in the Bylaws or in the Articles of Company. The number of directors comprising the Board of Directors shall be six (6), unless and until otherwise determined by vote of a majority of the entire Board of Directors.

Section 2.2. Election; Term of Office; Resignation; Newly Created Directorships and Vacancies. At each annual meeting of shareholders, directors shall be elected to hold office until the next annual meeting. Each director, including a director elected to fill a vacancy, shall hold office until the expiration of the term for which elected and until a successor has been elected and qualified. Any director may resign effective upon giving written notice to the Chairperson of the Board of Directors, and/or the Secretary or the Board of Directors unless the notice specifies a later time for the effectiveness of such resignation. If the resignation is effective at a future time, a successor may be elected to take office when the resignation becomes effective. There will be four (4) permanent seats reserved for the founders, or a person elected by the founders, of JustinCredible Cultivation, LLC on the Board. The officer seats on the board will be permanent until the company has been active in business for 10 years. Once the company has been active in business for 10 years, the Board will vote on the need for new officers.

Subject to the provisions of the Articles of Company, any director, beside the four Officer Board Members elected within the first 10 years, may be removed with or without cause at any time by the shareholders of the Company at a special meeting called for such purpose.

Unless otherwise provided in the Articles of Company or the Bylaws, newly - created directorships resulting from an increase in the number of directors, shall be filled by vote of a majority of the directors then in office, although less than a quorum, or by a sole remaining director.

Unless otherwise provided in the Articles of Company or the Bylaws, vacancies on the Board of Directors may be filled by appointment by the Board of Directors. The shareholders may elect a director at any time to fill a vacancy not filled by the Board of Directors. A director elected to fill a vacancy shall be elected to hold office for a term expiring at the next annual meeting of shareholders, or until his or her earlier death, resignation or removal.

Section 2.3. Regular Meetings. Regular meetings of the Board of Directors may be held without notice at such places within or without the state of Massachusetts and at such times as the Board of Directors may from time to time determine.

Section 2.4. Special Meetings; Notice of Meetings; Waiver of Notice. Special meetings of the Board of Directors may be held at any time or place within or without the state of Massachusetts whenever called by the Chairperson of the Board of Directors, by the Vice Chairperson of the Board of Directors, if any, or by any four directors. Special meetings shall be held on five days' notice by mail or 48 hours' notice delivered personally or by telephone, facsimile or any other means of communication authorized by the Massachusetts Business Company Act. Notice delivered personally or by telephone may be transmitted to a person at the director's office who can reasonably be expected to deliver such notice promptly to the director.

Notice of a meeting need not be given to any director who signs a waiver of notice or a consent to holding the meeting or an approval of the minutes thereof, whether before or after the meeting, or who attends the meeting without protesting, prior thereto or at its commencement, the lack of notice to such director. All such waivers, consents and approvals shall be filed with the corporate records or made a part of the minutes of the meeting. A notice, or waiver of notice, need not specify the purpose of any regular or special meeting of the Board of Directors.

Section 2.5. Participation in Meetings by Conference Telephone Permitted. Annual meetings that require in-person attendance will allow a Teleconference option for individuals who cannot attend, with Notice of Reason filed by the Secretary. Members of the Board of Directors, or any committee designated by the Board of Directors, may participate in a meeting of the Board of Directors or of such committee, as the case may be, through the use of teleconference or similar communications equipment permitted by the Massachusetts Business Company Act, so long as all members participating in such meeting can hear one another. Participation in a meeting pursuant to this Section 2.5 shall constitute presence in person at such meeting.

Section 2.6. Quorum; Adjournment; Vote Required for Action. At all meetings of the Board of Directors, a majority of the authorized number of directors shall constitute a quorum for the transaction of business. Subject to the provisions of the Massachusetts Business Company Act, every act or decision done or made by a majority of the directors present at a meeting at which a quorum is present shall be the act of the Board of Directors unless the Articles of Company or the Bylaws require a vote of a greater number. Each director present will have one vote, regardless of the number of shares of stock held by such director.

A majority of the directors present, whether or not a quorum is present, may adjourn any meeting to another time and place. If the meeting is adjourned for more than 24 hours, notice of any adjournment to another time or place shall be given prior to the time of the adjourned meeting to the directors who were not present at the time of the adjournment.

Section 2.7. Organization. Meetings of the Board of Directors shall preside over the Chairperson of the Board of Directors, or in the absence of the Chairperson of the Board of Directors by the Vice Chairperson of the Board of Directors, if any, or in their absence by a chairperson chosen at the meeting. The Secretary, or in the absence of the Secretary an Assistant Secretary, shall act as secretary of the meeting, but in the absence of the Secretary and any Assistant Secretary, the chairperson of the meeting may appoint any person to act as secretary of the meeting.

Section 2.8. Action by Directors Without a Meeting. Any action required or permitted to be taken by the Board of Directors, or any committee thereof, may be taken without a meeting if all members of the Board of Directors or of such committee, as the case may be, individually or collectively consent in writing to such action. Such written consent or consents shall be filed with the minutes of the proceedings of the Board of Directors. Such action by written consent shall have the same force and effect as a unanimous vote of such directors.

Section 2.9. Compensation of Directors. The Board of Directors has the authority to fix the compensation of directors for services in any capacity.

Section 2.10. **Interested Directors; Quorum.** No contract or transaction between the Company and one or more of its directors or between the Company and any other Company, firm, association or entity in which one or more of the Company's directors are directors, officers or financially interested shall be void or voidable because of such relationship or interest, because such directors (the "Interested Directors") are present at the meeting of the Board of Directors or a committee of the Board of Directors which authorizes, approves, or ratifies such contract or transaction, or because the votes of Interested Directors are counted for such purpose if:

a) the facts about the relationship or interest of the Interested Directors are fully disclosed to, or are known to, the Board of Directors or the committee and a majority of the Board of Directors or committee with no relationship or interest in the contract or transaction authorizes, approves or ratifies the contract or transaction by a vote sufficient for the purpose without counting the votes or consents of the Interested Directors; provided that, if the Board of Directors is comprised of a single director, the Board of Directors may not authorize, approve, or ratify a transaction under this subsection;

b) the facts about the relationship or interest of the Interested Directors are fully disclosed to, or are known by, the shareholders and such contract or transaction is authorized, approved or ratified by the holders of a majority of the shares entitled to vote under this subsection in good faith (i) without counting the votes or consents of the shares owned by or voted under the control of an Interested Director and (ii) with the holders of a majority of the shares, whether or not present, entitled to vote on the transaction under this subsection constituting a quorum for the purpose of taking such action under this subsection; or

c) the contract or transaction is fair and reasonable as to the Company at the time it is authorized by the Board of Directors, a committee, or the shareholders.

ARTICLE III

Executive and Other Committees

Section 3.1. **Executive and Other Committees of Directors.** The Board of Directors, by resolution adopted by a majority of the authorized number of directors, may designate an executive committee and other committees, each consisting of two or more directors, to serve at the pleasure of the Board of Directors, and each of which, to the extent provided in the resolution but subject to the Massachusetts Business Company Act, shall have all the authority of the Board of Directors.

The Board of Directors may designate one or more directors as alternate members of any such committee, who may replace any absent member or members at any meeting of such committee.

Unless the Board of Directors otherwise provides, each committee designated by the Board of Directors may adopt, amend and repeal rules for the conduct of its business. In the absence of a provision by the Board of Directors or a provision in the rules of such committee to the contrary, each committee shall conduct its business in the same manner as the Board of Directors conducts its business pursuant to Article II of the Bylaws.

ARTICLE IV

Officers

Section 4.1. **Officers; Election.** As soon as practicable, after the annual meeting of shareholders in each year, the Board of Directors shall elect a President, a Treasurer and a Secretary. The Board of Directors may also elect one or more Vice Presidents, one or more Assistant Secretaries, and such other officers as the Board of Directors may deem desirable or appropriate and may give any of them such further designations or alternate titles as it considers desirable. Any number of offices may be held by the same person.

Section 4.2. **Term of Office; Resignation; Removal; Vacancies.** Except as otherwise provided in the resolution of the Board of Directors electing any officer, each officer shall hold office until his or her successor is elected and qualified or until his or her earlier resignation or removal. Any officer may resign at any time upon written notice to the Board of Directors or to the Chairperson of the Board of Directors or the Secretary of the Company. Such resignation shall take effect at the time specified therein, and unless otherwise specified therein no acceptance of such resignation shall be necessary to make it effective. The Board of Directors may remove any officer with or without cause at any time. Any such removal shall be without prejudice to the contractual rights of such officer, if any, with the Company, but the election of an officer shall not of itself create contractual rights. Any vacancy occurring in any office of the Company by death, resignation, removal or otherwise may be filled for the unexpired portion of the term by the Board of Directors at any regular or special meeting.

Section 4.3. **Powers and Duties.** The officers of the Company shall have such powers and duties in the management of the Company as stated in the Bylaws or in a resolution of the Board of Directors which is not inconsistent with the Bylaws and, to the extent not so stated, as generally pertain to their respective offices, subject to the control of the Board of Directors. The Secretary shall have the duty to record the proceedings of the meetings of the shareholders, the Board of Directors and any committees in a book to be kept for that purpose.

Section 4.4. **Salaries.** The salaries, compensation and other benefits, if any, of the officers shall be fixed from time to time by the Board of Directors, and no officer shall be prevented from receiving such salary by reason of the fact that he or she is also a director of the Company.

Commented [1]: Add Chief Officers - CEO add compensation, - Exec Offc Level of Compensation: housing, car maintenance, etc

Section 4.5. **Chairperson.** The Chairperson shall be the Chief Executive Officer of the Company and shall have general supervision over the business of the Company; subject, however, to the control of the Board of Directors and of any duly authorized committee of directors. He or she shall preside at all meetings of the shareholders and of the Board of Directors. He or she may, with the Secretary or the Treasurer or an Assistant Secretary or an Assistant Treasurer, sign certificates for shares of capital stock of the Company. He or she may sign and execute in the name of the Company deeds, mortgages, bonds, contracts and other instruments, except in cases where the signing and executing thereof shall be expressly delegated by the Board of Directors or by the Bylaws to some other officer or agent of the Company, or shall be required by law otherwise to be signed or executed; and, in general, he or she shall perform all duties incident to the office of Chairperson and such other duties as from time to time may be assigned to him or her by the Board of Directors.

Section 4.6. **President.** The President shall be the Chief Financial Officer of the Company and shall have general supervision over the day-to-day affairs of the Company, subject, however, to the control of the Chairman, the Board of Directors and any duly-authorized committee of directors. The President shall, if the Chairperson shall not be present, preside at meetings of the shareholders and at meetings of the Board of Directors. He or she may, with the Secretary or the Treasurer or an Assistant Secretary or an Assistant Treasurer, sign certificates for shares of capital stock of the Company. He or she may sign and execute in the name of the Company deeds, mortgages, bonds, contracts and other instruments, except in cases where the signing and execution thereof shall be expressly delegated by the Board of Directors or by the Bylaws to some other officer or agent of the Company, or shall be required by law otherwise to be signed or executed; and, in general, he or she shall perform all duties incident to the office of President and such other duties as from time to time may be assigned to him or her by the Board of Directors.

Section 4.7. **Vice Presidents.** At the request of the President, or, in his or her absence, at the request of the Board of Directors, the Vice Presidents shall (in such order as may be designated by the Board of Directors or, in the absence of any such designation, in order of seniority based on age) perform all of the duties of the President and so acting shall have all the powers of, and be subject to, all restrictions upon the President. Any Vice President may, with the Secretary or the Treasurer or an Assistant Secretary or an Assistant Treasurer, sign certificates for shares of capital stock of the Company. Any Vice President may sign and execute, in the name of the Company, deeds, mortgages, bonds, contracts or other instruments authorized by the Board of Directors, except in cases where the signing and execution thereof shall be expressly delegated by the Board of Directors or by the Bylaws to some other officer or agent of the Company, or shall be required by law otherwise to be signed or executed. Each Vice President shall perform such other duties as from time to time may be assigned to him by the Board of Directors, by the Chairperson or by the President.

Section 4.8. **Secretary.** The Secretary, if present, shall act as secretary of all meetings of the shareholders and of the Board of Directors, and shall keep the minutes thereof in the proper book or books to be provided for that purpose; he or she shall see that all notices required to be given by the Company are duly given and served; he or she may, with the Chairperson, the President or a Vice President, sign certificates for shares of capital stock of the Company; he or she shall be custodian of the seal of the Company and may seal with the seal of the Company, or a facsimile thereof, all certificates for shares of capital stock of the Company and all documents the execution of which on behalf of the Company under its corporate seal is authorized in accordance with the provisions of the Bylaws; he or she shall have charge of the stock ledger and also of the other books, records and papers of the Company relating to its organization and management as a Company, and shall see that the reports, statements and other documents required by law are properly kept and filed; and shall, in general, perform all the duties incident to the office of Secretary and such other duties as from time to time may be assigned to him by the Board of Directors, by the Chairperson or by the President.

Section 4.9. **Treasurer.** The Treasurer shall have charge and custody of, and be responsible for, all funds, securities and notes of the Company; receive and give receipts for moneys due and payable to the Company from any source whatsoever; deposit all such moneys in the name of the Company in such banks, trust companies or other depositories as shall be selected in accordance with these Bylaws; against proper vouchers, cause such funds to be disbursed by checks or drafts on the authorized depositories of the Company signed in such manner as shall be determined in accordance with any provisions of the Bylaws, and be responsible for the accuracy of the amounts of all moneys so disbursed; regularly enter or cause to be entered in books to be kept by him or her or under his or her direction full and adequate account of all monies received or paid by him or her for the account of the Company; have the right to require, from time to time, reports or statements giving such information as he or she may desire with respect to any and all financial transactions of the Company from the officers or agents transacting the same; render to the Chairperson, the President or the Board of Directors, whenever the Chairperson, the President or the Board of Directors, respectively, shall require him or her so to do, an account of the financial condition of the Company and of all his or her transactions as Treasurer; exhibit at all reasonable times his or her books of account and other records to any of the directors upon application at the office of the Company where such books and records are kept; and, in general, perform all the duties incident to the office of Treasurer and such other duties as from time to time may be assigned to him or her by the Board of Directors, by the Chairperson or by the President; and he or she may sign with the Chairperson, the President or a Vice President certificates for shares of capital stock of the Company.

Section 4.10. **Assistant Secretaries and Assistant Treasurers.** Assistant Secretaries and Assistant Treasurers shall perform such duties as shall be assigned to them by the Secretary or by the Treasurer, respectively, or by the Board of Directors, by the Chairperson or by the President. Assistant Secretaries and Assistant Treasurers may, with the Chairperson, the President or a Vice President, sign certificates for shares of capital stock of the Company.

ARTICLE V

Forms of Certificates; Loss and Transfer of Shares

Section 5.1. **Forms of Certificates.** Every holder of shares in the Company is entitled to have a certificate signed in the name of the Company by (a) the President, any Vice President, Chairperson of the Board of Directors or Vice Chairperson of the Board of Directors, and (b) by the Chief Financial Officer, Treasurer, Assistant Treasurer, Secretary or Assistant Secretary, of the Company, certifying the number of shares and the class or series of shares owned by such shareholder. If such certificate is manually signed by one officer or manually countersigned by a transfer agent or by a registrar, any other signature on the certificate may be a facsimile. If any officer, transfer agent or registrar who signs or whose facsimile signature is placed upon a certificate ceases to remain in such position before such certificate is issued, it may be issued by the Company with the same effect as if such person were such officer, transfer agent or registrar at the date of issue.

Section 5.2. **Lost, Stolen or Destroyed Stock Certificates; Issuance of New Certificates.** The holder of any shares of the Company shall immediately notify the Company of any loss, destruction, theft or mutilation of the certificate representing such shares. The Company may issue a new share certificate or a new certificate for any other security in the place of any certificate theretofore issued by it, alleged to have been lost, stolen or destroyed, and the Company may require the owner of the lost, stolen or destroyed certificate, or such owner's legal representative, to give the Company a bond sufficient to indemnify it against any claim that may be made against it (including any expense or liability) on account of the alleged loss, theft or destruction of any such certificate or the issuance of such new certificate.

ARTICLE VI

Records and Reports

Section 6.1. **Shareholder Records.** The Company shall keep, at its principal executive office or at the office of its transfer agent or registrar, a record of the names and addresses of all shareholders and the number and class of shares held by each shareholder, as well as all written communication with shareholders within the past three (3) years.

Section 6.2. **Corporate Documents and Bylaws.** The Company shall keep at its principal executive office the original or a copy of the Articles of Company and the Bylaws as amended to date, which shall be open to inspection by the shareholders at all reasonable times during office hours. The Company shall, upon the written request of any shareholder, furnish to that shareholder a copy of the Articles of Company or the Bylaws.

Section 6.3. **Minutes and Accounting Records.** The minutes of proceedings of the shareholders, the Board of Directors, and committees of the Board of Directors, and the accounting books and records shall be kept at the principal executive office of the Company, or at such other place or places as designated by the Board of Directors. The minutes shall be kept in written form, and the accounting books and records shall be kept either in written form or in a form capable of being converted into written form.

Section 6.4. **Inspection by Directors.** Subject to applicable Massachusetts law, every director shall have the right at any reasonable time to inspect all books, records, and documents of every kind and the physical properties of the Company and each of its subsidiary Company's for purposes relating to his or her status as director. This inspection by a director may be made in person or by an agent or attorney and the right of inspection includes the right to copy and make extracts of documents.

Section 6.5. **Annual Report to Shareholders.** Subject to the Massachusetts Business Company Act, for as long as the Company has fewer than the number of shareholders specified in the applicable statute, if any, any requirement of an annual report to shareholders is expressly waived. However, nothing in this provision shall be interpreted as prohibiting the Board of Directors from issuing annual or other periodic reports to the shareholders, as the Board of Directors considers appropriate. Additionally, the Company shall keep a record of its most recent annual report delivered to the Massachusetts Department of State.

Section 6.6. **Financial Statements.** The Company shall keep a copy of each annual financial statement, quarterly or other periodic income statement, and accompanying balance sheets prepared by the Company on file in the Company's principal office for 12 months; these documents shall be exhibited at all reasonable times, or copies provided, to any shareholder on demand.

Section 6.7. **Director and Officer Records.** The Company shall keep a list of the names and business addresses for the Company's current directors and officers.

Section 6.8. **Form of Records.** Any records maintained by the Company in the regular course of its business, with the exception of minutes of the proceedings of the shareholders, and of the Board of Directors and its committees, but including the Company's stock ledger and books of account, may be kept on, or be in the form of, magnetic tape, photographs, microphotographs or any other information storage device, provided that the records so kept can be converted into clearly legible form within a reasonable time. The Company shall so convert any records so kept upon the request of any person entitled to inspect the same.

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ARTICLE VII

Miscellaneous

Section 7.1. **Principal Executive or Business Offices.** The Board of Directors shall fix the location of the principal executive office of the Company at any place either within or without the state of Massachusetts. The Company may also have additional offices in other places as the Company's business may require, and as the Board of Directors may determine from time to time.

Section 7.2. **Fiscal Year.** The fiscal year of the Company shall be determined by the Board of Directors.

Section 7.3. **Seal.** The Company may have a corporate seal which shall have the name of the Company inscribed thereon and shall be in such form as may be approved from time to time by the Board of Directors. The corporate seal may be used by causing it or a facsimile thereof to be impressed or affixed or in any other manner reproduced.

Section 7.4. **Indemnification.** The Company shall have the power to indemnify, to the maximum extent and in the manner permitted by the Massachusetts Business Company Act, each of its directors, officers, employees and agents against expenses, judgments, fines, settlements, and other amounts actually and reasonably incurred in connection with any proceeding arising by reason of the fact that such person is or was an agent of the Company.

Section 7.5. **Contracts.** The Board of Directors may authorize any officer or officers, agent or agents, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the Company, and such authority may be general or confined to specific instances.

Section 7.6. **Dividends.** The Board of Directors may from time to time declare, and the Company may pay dividends on its outstanding shares in the manner and upon the terms and conditions provided by Massachusetts law and its Articles of Company. No distribution may be made if, after giving it effect:

- a) The Company would not be able to pay its debts as they become due in the usual course of business; or
- b) The Company's total assets would be less than the sum of its total liabilities plus the amount that would be needed, if the Company were to be dissolved at the time of the distribution, to satisfy the preferential rights upon dissolution of shareholders whose preferential rights are superior to those receiving the distribution.

Section 7.7. **Amendment of the Bylaws.** To the extent permitted by law, the Bylaws may be amended or repealed, and new bylaws adopted, by the Board of Directors. The shareholders entitled to vote, however, retain the right to adopt additional bylaws and may amend or repeal any bylaw whether or not adopted by them.

[Remainder Intentionally Left Blank.]

CERTIFICATE OF SECRETARY OF

JustinCredible Cultivation, LLC

The undersigned, Reginald Stanfield, as Secretary of JustinCredible Cultivation, LLC, a Massachusetts Company (the "Company"), hereby certifies the attached document is a true and complete copy of the bylaws of the Company and that such bylaws were duly adopted by the Board of Directors of the Company on the date set forth below.

IN WITNESS WHEREOF, the undersigned has executed this certificate as of
_____, 20____.

Jonathan M. Siberon
Secretary



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$500.00

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

Certificate of Organization

(General Laws, Chapter)

Identification Number: 001342765

1. The exact name of the limited liability company is: JUSTINCREDIBLE CULTIVATION, LLC

2a. Location of its principal office:

No. and Street: 0 POWELL ROAD

City or Town: CUMMINGTON

State: MA

Zip: 01026

Country: USA

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

No. and Street: 0 POWELL ROAD

City or Town: CUMMINGTON

State: MA

Zip: 01026

Country: USA

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

AGRICULTURAL

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: SHARI THOMAS

No. and Street: 63 FLORENCE ST

City or Town: BROCKTON

State: MA

Zip: 02301

Country: USA

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	REGINALD STANFIELD 2ND	0 POWELL ROAD CUMMINGTON, MA 01026 USA
MANAGER	CHETOIA WALKER	0 POWELL ROAD CUMMINGTON, MA 01026 USA
MANAGER	TERRANCE HANELY	0 POWELL ROAD CUMMINGTON, MA 01026 USA
MANAGER	JONATHAN SIBERON	0 POWELL ROAD CUMMINGTON, MA 01026 USA

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

managers.

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	REGINALD STANFIELD 2ND	0 POWELL ROAD CUMMINGTON, MA 01026 USA
REAL PROPERTY	TERRANCE HANELY	0 POWELL ROAD CUMMINGTON, MA 01026 USA

9. Additional matters:

SIGNED UNDER THE PENALTIES OF PERJURY, this 23 Day of August, 2018,
REGINALD STANFIELD
(The certificate must be signed by the person forming the LLC.)

THE COMMONWEALTH OF MASSACHUSETTS

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

August 23, 2018 10:14 AM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive style with a large, stylized 'G' at the end.

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



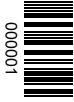
Commonwealth of Massachusetts
Department of Revenue
Christopher C. Harding, Commissioner

mass.gov/dor

Letter ID: L1627275904
Notice Date: August 24, 2018
Case ID: 0-000-485-523



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



REGINALD STANFIELD
JUSTINCREDIBLE CULTIVATION
0 POWELL ROAD
CUMMINGTON MA 01026

Why did I receive this notice?

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

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

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

What if I have questions?

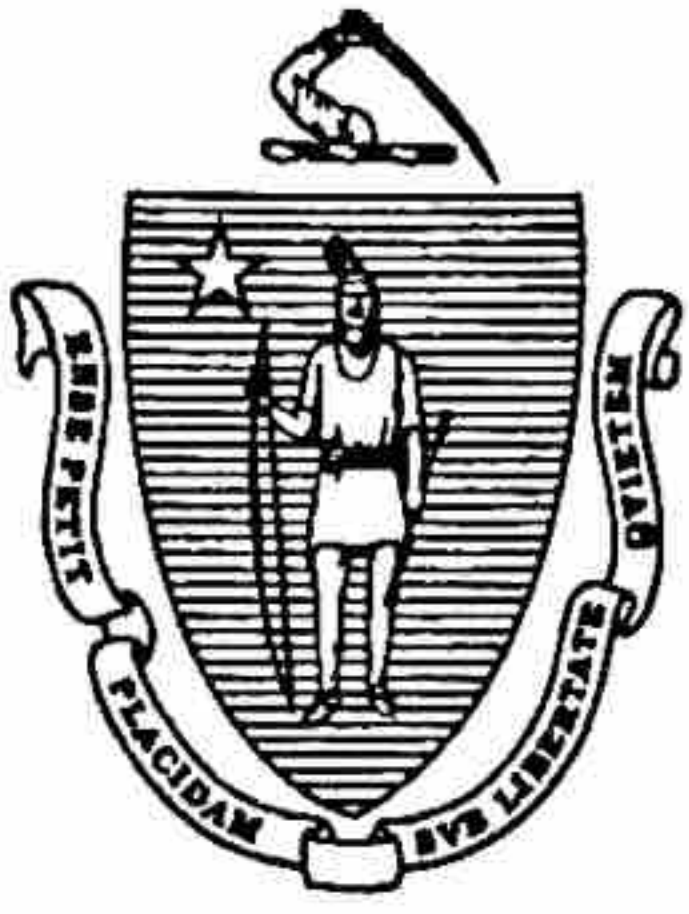
If you have questions, call us at (617) 887-6367 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau



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

William Francis Galvin
Secretary of the
Commonwealth

August 24, 2018

TO WHOM IT MAY CONCERN:

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

JUSTINCREDIBLE CULTIVATION, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **August 23, 2018.**

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

I also certify that the names of all managers listed in the most recent filing are: **REGINALD STANFIELD 2ND, CHETOIA WALKER, TERRANCE HANELY, JONATHAN SIBERON**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **REGINALD STANFIELD 2ND, CHETOIA WALKER, TERRANCE HANELY, JONATHAN SIBERON**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **REGINALD STANFIELD 2ND, TERRANCE HANELY**

In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.



William Francis Galvin

Secretary of the Commonwealth

Restricting Access to age 21 and older

Age Limit and restriction is important to maintain the health and wellbeing of all individuals under the age of 21 years old. We will use the methods below to help ensure our product does reach under age individuals.

1. Labeling the product correctly and legible will be key so that there is no confusing our products. Even though our product will only be sold to dispensaries and manufactures, labeling can help deter and promote under age restrictions.
2. Training will allow our employees and owners the ability to demonstrate how the handling of products should be done at all time. Once everyone is properly trained the possibility of error will decrease substantially.
3. For all visits to the facility, each person must be ID and documented.
4. Documentation will provide an important part of restriction, documenting everyone who visits and leaves, if for any reason, a minor enters the facility we will have documentation to review and find a solution to how the incident can be avoided in the future.
5. Updated examples of the minimum age ID required.

Personnel Policy Plan

JustinCredible Cultivation, LLC (JCC) proudly represents all dynamics presented in this category, because of that, we actively promote equality and diversity in our company. JCC will expand and open multiple positions within our company; from record keeping and office work, to having Lady's Day and, teaching women about the great industry of cannabis. Our company is focused on making teaching and creating opportunities for all people a priority. Our staff will be made up of our Officers and Managers. This gives us the ability of upper level hands-on responsibility.

The Chief Operations Officer (COO) shall ensure that all cultivation procedures are standardized, meet the requirements of the Cannabis Control Commission (CCC), and are implemented daily. This procedure outlines the requirements and regulations for Personnel operational and safety trainings.

Personnel Policy Goals

Short Term Goals (within the first 2 years of operation)

1. Create employee handbook that outlines all JCC expectations, requirements, and regulations
This handbook will require employee signature to ensure full understanding and willingness to comply with JCC standards
2. Integrated workplace diversity that coincides with equal employment opportunities that represent and include those from under-represented groups
3. Creating positions that cater to veterans and those with disabilities/ special needs
4. Continuous training reviews from Upper Management to ensure JCC is meeting all compliance requirements and maintaining innovative methods to foster an agile environment as industry standards advance over time
5. Have below 4 documented infractions

Long Term Goals (within 5 years of operation)

1. Become a highly regarded employer within the community
2. Offer 100% employer paid benefits to all full-time/long-term employees
3. Create leadership teams to deploy to flagship locations who will echo the same best practices in all new locations and set the standard of excellence for other JCC cultivation facilities
4. Have below 10 documented policy infractions throughout company's history

Procedures

- Policies
- Training Schedule
- Safety Plan
- Management Positions
- Background Check Requirements

JCC personnel policy requirements:

- Pursuant to 935 CMR 500.120 to entering the cultivation facility, all employees must be identified by security or management personnel at the secured entry point. All employees will enter the facility through the main secure entrance with the head security officer maintaining the secured entry. Once inside the secured entrance area, employees must change into clean working uniforms before entering the working areas of the cultivation facility
- Upon entry all employees must present Agent ID to the main security officer
- All Employees must sign in, with confirmed time and date, the log will include Employees name, badge number, assigned work hours and the signature of the head security officer to confirm the information is correct
- All employees must change into their sanitary cultivation uniforms, leave all unnecessary items in locker and wash hands
- All personnel must attend weekly safety and compliance meetings, where staff will be refreshed on company policies. Fire protection plans, inclement weather procedures and emergency procedures plans
- At a minimum, staff shall receive eight hours of on-going training annually
- Marijuana Establishments shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent
- On or after July 1, 2019, all current owners, managers and employees of a Marijuana Establishment that are involved in the handling and sale of marijuana for adult use at the time of licensure or renewal of licensure, as applicable, shall have attended and successfully completed a responsible vendor program to be designated a "responsible vendor."
- Marijuana establishments must maintain records of responsible vendor training program compliance for four years and make them available to inspection by the Commission and any other applicable licensing authority upon request during normal business hours.
- All equipment must not leave the facility
- Any broken equipment or plant matter must be reported to the DoH and COO and either destroyed or replaced
- All reports must be turned in by COB on designated days
- Any reports must have been requested and filed within 24 hours of said request, unless it needs an emergency meeting or requested by any government entity, then it will be expedited
- All personnel must use hand sanitizer, wear a hair net, cultivation coat, and shoe cover while entering the cultivation facility
- Any spills must be cleaned up promptly, no water should be left standing on a floor. If floor is wet, the COO must be notified, and a sign will be placed until dry

- The records room and security room will only be accessible to assigned Security personnel and the CEO.
- All cannabis waste and materials must be under 24/7 HD surveillance
- All cannabis waste must be separated by placing them into “Green Waste” containers and no other waste will be placed in the same container.
- All green waste containers must be weighed, logged and securely stored in their own locked container until it is destroyed
- Waste disposal records as required under 935 CMR 500.105(12); and (g) Following closure of a Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission
- Employees must notify management of all schedule changes before 24 hours of their scheduled shift. If in emergency situations, employees must call and send written explanation of absent as soon as possible
- All none registered agents, emergency personnel or Cannabis Control Commission sanctioned individuals must obtain visitor pass, sign in with a government issued ID and be escorted the entire time they are within the facility
- All none registered agents, emergency personnel or Cannabis Control Commission sanctioned individuals will only be permitted inside of the flower
- room and mother rooms. All other rooms are restricted for registered agents, emergency personnel and Cannabis Control Commission.
- Employees may take a paid 15-minute rest period during each half shift, scheduled at or as near as feasible to the middle of each half shift. Consistent with operating requirements, employees who, at the request of JCC, work two or more hours beyond their regular quitting time shall receive a 15-minute rest period before starting on the next shift, in addition to the regular rest periods occurring during the shift. Each rest period shall not exceed fifteen (15) minutes total. Rest periods shall not interfere with or be detrimental to the public safety.
- Employees shall be granted an unpaid meal period not to exceed one hour during each work shift. Consistent with operating requirements, meal periods shall be scheduled at or about the middle of the work shift. Employees who have their meal period interrupted by JCC to perform required work shall be compensated for their meal period time worked
- Time cards must serve as an accurate record of the time for which each employee is paid wages and overtime. Each employee is expected to record accurately the time spent working on District business. Personal time spent in District offices outside regular working hours should not be recorded. An employee of the District may volunteer

service to the District, and the time involved would not be recorded, ONLY IF the volunteer hours worked DO NOT INVOLVE THE SAME TYPE OF SERVICE which the person is employed to perform for the District. All volunteer activities by employees must be approved in advance, and in writing

- All Licenses shall be posted inside of the facility at an accessible and secure position.
- Any operation hour changes will be reported to all necessary persons or authorities
- If any emergencies are to happen, all employees must exit through the emergency exit door and meet in the designated employee meeting zone. Wait till the building is clear by authorities. All employees must be signed and an annotation must be made to clearly record the emergency and re entry into the building
- After an emergency all equipment, plant matter and procedures must be inventoried and recorded with an annotation of the emergency
- Our facility will be a smoke-free, drug free and alcohol free zone. Any employee caught using or under the influence of cannabis will be written up and management will follow the correct procedures outlined by the State of Massachusetts
- All confidential information will be secured in the records room, clearly labeled and under 24/7 HD surveillance
- Any employee found to repeatedly break policies, divert cannabis or cannabis materials or be convicted of any felony offense dealing with minors or distribution will be immediately removed from facility. If the employee is caught diverting cannabis or cannabis materials while on the premises of the facility, the authorizes will be immediately notified, facility placed on administrative lock down and surveillance made available to authorizes. The Cannabis Control Commission will be notified immediately and a request to temporarily suspend the agents registration until the commission takes over the investigation and acts accordingly. All badges will be confiscated from said employee.
- Board members and Owners profile will be kept up to date on JCC's website once final licensed is approved
- The CSO is responsible for the security of all cash held on sight, there will be a 800+ pound safe secured to the floor where all cash ill be placed in its own separate locked box. The transaction receipts will be given to the CFO, counted on surveillance and logged as correct. Both the CSO and CFO must sign off on all logs with cash transactions. JCC plans on using an online service to handle available transactions dealing with the sale
- All records and files must be recorded and tracked based upon the standards of GAAP accounting principles and the regulations stipulated in the sections of 935 CMR 500.000, in addition to the following: (a) Written operating procedures as required by 935 CMR 500.105(1); (b) Inventory records as required by 935 CMR 500.105(8); (c) Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105

- All registered agents must complete an employee onboarding packet, that will include Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following: a. all materials submitted to the Commission pursuant to 935 CMR 500.030(2); b. documentation of verification of references; c. the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision d. documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters; e. documentation of periodic performance evaluations; f. a record of any disciplinary action taken; and g. notice of completed responsible vendor and eight-hour related duty training. 3. A staffing plan that will demonstrate accessible business hours and safe cultivation conditions; 4. Personnel policies and procedures; and 5. All background check reports obtained in accordance with 935 CMR 500.030.

Trainings schedule

The Chief Compliance Officer (CCO) will overview the Compliance Training, which will include information on the seed-to-sale process, how to securely lock the cultivation facility, and how to oversee visitors.

The Director of Horticulture (DoH) will overview the issues that would require the plant buds to be contaminated and discarded, how to use the Seed-to-Sale process on each phase, procedures to handle the packaging and storing of the flower, and training on securing the transport of the flower. The DoH will also train employees on which labels must be placed on each packaging, including warnings, restrictions, THC percentages, strain name and type, batch number and time and date of packaging.

Staff Meetings: Team meetings will be implemented organization-wide and will provide opportunities for team members to receive updated training as required by 935 CMR 500.101, and to discuss current trends and ideas on how to make processes more effective or efficient. Team meetings will, at the very least, be held once a week for each facility as well as a weekly meeting between all facility managers.

Shift Meetings: Shift meetings will be held on a daily basis between team members and the facility manager or department leads. A shift meeting will be held prior to the start of business each day to discuss workflow and goals for the shift. A meeting will also be held at the closure of business to discuss the day's operations and to determine if shift goals were achieved.

Safety Plans

In order to protect the organization from costly non-compliance penalties, stabilize worker's compensation costs, enhance productivity, and reduce turnover, a sound safety plan is absolutely required. Paychex will assist in the development of the plan by writing a safety program manual tailored

to the organization's needs and provide on demand WebEx safety trainings. JustinCredible Cultivation will provide training upon hire as well as monthly to each employee including but not limited to:

- Health, safety, and sanitation standards as required by the Massachusetts Cannabis Control Commission
- Security procedures
- Prohibitions and enforcement as described by 935 CMR 500.110.
- Confidentiality and all other provisions of 935 CMR 500.101 that apply to the individual's scope of employment.

Measurement & Accountability (Metrics)

- Company Feedback polling. Surveying and polling the company will be a huge key of our accountability. Hearing directly from the employees and staff is an invaluable piece of data. Regardless of the research being done, JCC will gather the honest opinions of the staff JCC plans to positively impact
- Educate our advisory board on the repercussion of violating personal policies
- Send all documented infractions to chairman of advisory board. The advisory board will keep management liability and create a level of checks and balances between owners and the company
- Collect signed SOP forms from all agents that will operate or management JCC
- Post Rules and Policy's for employees to reference during complex procedures.
- Have signs to remind employees to Lock all doors at each door and cabinet
- Audit Video surveillance Quarterly on random shifts to check for missed infractions
- Personnel performance reviews will be conducted quarterly, trainings and educational tools will be given to improve employees performances, employees must sign all documentations

Record Keeping Compliance Plan

The top priorities for JustinCredible Cultivation (JCC) are public safety and creating positive impact within the community. To accomplish this, JCC has established operational systems that ensure best practices are consistently followed and compliance expectations are met.

Compliance Plan Goal

1. Short term goals:

- a. Create written operating procedures as required by 935 CMR 500.105(1) to establish good business practices and to be compliant with CCC.
- b. Create inventory records as required by 935 CMR 500.105(8) to establish good business practices and to be compliant with CCC.
- c. Create seed to sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e) to establish good business practices and to be compliant with CCC.
- d. Create Job descriptions for each employee and volunteer positions, organizational charts, and personnel records, a staffing plan, personnel plan, and background check reports to establish good business practices and to be compliant with CCC.
- e. Create and maintain business records of assets and liabilities, monetary transactions, books of accounts, sales records, and salary and wages of employees to begin successful records keeping for proper CCC compliance.
- f. Create waste disposal records as required under 935 CMR 500.105(12) to ensure access to information for all employees when needed.
- g. Create a database for all records following the closure of JCC to be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.

2. Long term goals:

- a. Maintain all record keeping procedures for operations to ensure compliancy and to remain in good standing with the CCC.
- b. Maintain inventory records for organizational purposes, audits, and to remain compliant with the CCC.
- c. Streamline the logging and reporting of each plant to maintain efficiency within operations and to remain compliant with the CCC.

- d. Uphold optimal standards to hire the best candidates for any JCC positions within the 935 CMR 500.00.
- e. Remain financially responsible, ensure the best business practices, be fully prepared for all audits, and to remain compliant with the CCC.
- f. Maintain compliancy with the CCC post JCC operations for up to 1 calendar year.

Program Policy & Procedures

1. Written operating procedures as required by 935 CMR 500.105(1).

A. Security measures in compliance with 935 CMR 500.110.

- Massachusetts codes requires three accessible doors within the facility. JCC will have one front door, and two side exits (steel-bolted doors), which will be emergency exits and upon opening sound an alarm.
- The facility will be monitored 24/7 by HD cameras, all rooms inside the facility (minus the office's bathroom) will be monitored 24/7.
- The front door will be double bolted and secured under an alarm system.
- The CEO, the DoH, and the CSO will be the only individuals with the code to the alarm system.
- There will be a second set of doors to enter the facility's cultivation area. The door will require two keys, one held always by the CSO and the other by the CEO. Once the operations have expanded, the CSO will select and monitor the employees who are chosen to open and close the facility.
- The process of cloning and germinating a seed must be signed off by three individuals, the DoH, CSO, and CEO.
- Every time a plant or any plant like matter moves from one room to the next, the process must be tracked and recorded. The process will be audited weekly and reported to the Board of Directors.
- Once plants are moved from the Flower room to the Trim room they must be trimmed and stored in locked, drying cabinets with keys, held by the CSO and DoH. This process will guarantee that any time flower is being trimmed and stored, it can be tracked and under the responsibilities of our officers.
- Once flower has been dried correctly, it will be packaged and once again locked in a cabinet that has key controlled by the DoH and CSO.

- Transporting the flower will be handled by the transporter company or dispensary if the dispensaries offers the service. Once the transporter arrives, the DoH will sign off on the amounts of the transportation of the flower and escort the transporter and CSO to the vehicle. The DoH will watch until the transporter and CSO leave and the liability will be passed on to the transporter and CSO.
- If our officers are transporting the cannabis flower, then the DoH will background check the individual and audit his/her transport route. Mapping out routes and giving distinct time periods when the driver should deliver the package will be key. Also, the transporter and CSO will have a company issued phone, which they will have tracking on through Location Sharing; which requires a password to disable. Only the DoH and CSO will have access. This will prevent any company transporter from turning off their geo-tracking app and ensuring that we know exactly where our company's product is at all time.
- JCC will track all bulk packages with tracers so that if unforeseen circumstances happen, we have a last line of defense. If the transporter misses the arrival time, fail to answer the phone, and miss three phone calls from our DoH, then we will report the product as missing immediately to the authorities.

B. Employee security policies, including personal safety and crime prevention techniques.

- Pursuant to 935 CMR 500.120 to entering the cultivation facility, all employees must be identified by security or management personnel at the secured entry point. All employees will enter the facility through the main secure entrance with the head security officer maintaining the secured entry. Once inside the secured entrance area, employees must change into clean working uniforms before entering the working areas of the cultivation facility.
- Upon entry all employees must present Agent ID to the main security officer.
- All Employees must sign in, with confirmed time and date, the log will include Employees name, badge number, assigned work hours and the signature of the head security officer to confirm the information is correct.
- All employees must change into their sanitary cultivation uniforms, leave all unnecessary items in locker and wash hands.
- All personnel must attend weekly safety and compliance meetings, where staff will be refreshed on company policies. Fire protection plans, inclement weather procedures and emergency procedures plans.
- All equipment must not leave the facility.
- Any broken equipment or plant matter must be reported to the DoH and COO and either destroyed or replaced.

- All reports must be turned in by COB on designated days.
- Any reports must have been requested and filed within 24 hours of said request, unless it needs an emergency meeting or requested by any government entity, then it will be expedited.
- All personnel must use hand sanitizer, wear a hair net, cultivation coat, and shoe cover while entering the cultivation facility.
- Any spills must be cleaned up promptly, no water should be left standing on a floor. If floor is wet, the COO must be notified, and a sign will be placed until dry.
- The records room and security room will only be accessible to assigned Security personnel and the CEO.
- All cannabis waste and materials must be under 24/7 HD surveillance.
- All cannabis waste must be separated by placing them into “Green Waste” containers and no other waste will be placed in the same container.
- All green waste containers must be weighed, logged and securely stored in their own locked container until it is destroyed.
- Waste disposal records as required under 935 CMR 500.105(12); and (g) Following closure of a Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.
- Employees must notify management of all schedule changes before 24 hours of their scheduled shift. If in emergency situations, employees must call and send written explanation of absent as soon as possible.
- All none registered agents, emergency personnel or Cannabis Control Commission sanctioned individuals must obtain visitor pass, sign in with a government issued ID and be escorted the entire time they are within the facility.
- All none registered agents, emergency personnel or Cannabis Control Commission sanctioned individuals will only be permitted inside of the flower room and mother rooms. All other rooms are restricted for registered agents, emergency personnel and Cannabis Control Commission.
- Employees may take a paid 15-minute rest period during each half shift, scheduled at or as near as feasible to the middle of each half shift. Consistent with operating requirements, employees who, at the request of JCC, work two or more hours beyond their regular quitting time shall receive a 15-minute rest period before starting on the next shift, in addition to the regular rest periods occurring during the shift. Each rest

period shall not exceed fifteen (15) minutes total. Rest periods shall not interfere with or be detrimental to the public safety.

- Employees shall be granted an unpaid meal period not to exceed one hour during each work shift. Consistent with operating requirements, meal periods shall be scheduled at or about the middle of the work shift. Employees who have their meal period interrupted by JCC to perform required work shall be compensated for their meal period time worked.
- Time cards must serve as an accurate record of the time for which each employee is paid wages and overtime. Each employee is expected to record accurately the time spent working on District business. Personal time spent in District offices outside regular working hours should not be recorded. An employee of the District may volunteer service to the District, and the time involved would not be recorded, ONLY IF the volunteer hours worked DO NOT INVOLVE THE SAME TYPE OF SERVICE which the person is employed to perform for the District. All volunteer activities by employees must be approved in advance, and in writing.
- All Licenses shall be posted inside of the facility at an accessible and secure position.
- Any operation hour changes will be reported to all necessary persons or authorities. If any emergencies are to happen, all employees must exit through the emergency exit door and meet in the designated employee meeting zone. Wait till the building is clear by authorities. All employees must be signed and an annotation must be made to clearly record the emergency and re-entry into the building after an emergency. All equipment, plant matter and procedures must be inventoried and recorded with an annotation of the emergency.
- Our facility will be a smoke-free, drug free and alcohol free zone. Any employee caught using or under the influence of cannabis will be written up and management will follow the correct procedures outlined by the State of Massachusetts.
- All confidential information will be secured in the records room, clearly labeled and under 24/7 HD surveillance.
- Any employee found to repeatedly break policies, divert cannabis or cannabis materials or be convicted of any felony offense dealing with minors or distribution will be immediately removed from facility. If the employee is caught diverting cannabis or cannabis materials while on the premises of the facility, the authorizes will be immediately notified, facility placed on administrative lock down and surveillance made available to authorizes. The Cannabis Control Commission will be notified immediately and a request to temporarily suspend the agents registration until the commission takes over the investigation and acts accordingly. All badges will be confiscated from said employee.

- Board members and Owners profile will be kept up to date on JCC's website once final licensed is approved.
- The CSO is responsible for the security of all cash held on sight, there will be a 800+ pound safe secured to the floor where all cash will be placed in its own separate locked box. The transaction receipts will be given to the CFO, counted on surveillance and logged as correct. Both the CSO and CFO must sign off on all logs with cash transactions. JCC plans on using an online service to handle available transactions dealing with the sale.
- All records and files must be recorded and tracked based upon the standards of GAAP accounting principles and the regulations stipulated in the sections of 935 CMR 500.000, in addition to the following:
 - Written operating procedures as required by 935 CMR 500.105(1).
 - Inventory records as required by 935 CMR 500.105(8).
 - Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105
- All registered agents must complete an employee onboarding packet, that will include Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2).
 - Documentation of verification of references.
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision.
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters.
 - Documentation of periodic performance evaluations.
 - A record of any disciplinary action taken.
 - Notice of completed responsible vendor and eight-hour related duty training.
 - A staffing plan that will demonstrate accessible business hours and safe cultivation conditions.

- Personnel policies and procedures.
- All background check reports obtained in accordance with 935 CMR 500.030

C. A description of JCC hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.

- Hours of operations will have type of operation modes.
 - A. Mode 1 will be operating hours where only monitoring and feeds plants.
Mondays-Sunday Operating Hours: 6pm-8am
 - B. Mode 2 will be to describe operating during times of transporting, heavy trimming or plant maintenance and harvesting.
Mondays- Sunday Operating Hours: 6am-8pm, 12am-4am
- Emergency Contact information:
 - A. Terrance Hanley (407) 205-7753
 - B. Reginald Stanfield (301) 885-9159

D. Storage of marijuana in compliance with 935 CMR 500.105 (11).

- Storage environments will be separated based on the stage of life cycle of the cannabis.
 - Mother plants will be stored in a 255 square foot air filtered room. These plants will be maintained under 8 luminance intensity controlled lights with a zone controlled AC unit accompanied by humidifiers to maintain perfect growing conditions.
 - All plants in the vegetation stage will be stored in a 408 square foot room. These plants will be maintained under 12 luminance intensity controlled lights with a zone controlled AC unit accompanied by humidifiers to maintain perfect growing conditions.
 - All plants in the flower stage will be stored in a 1002 square foot room. These plants will be maintained under 46 luminance intensity controlled lights with a zone controlled AC unit accompanied by humidifiers to maintain perfect growing conditions.
 - All cannabis curing and prepared for sale will be stored in mason jars in a 119 square foot room with standard commercial lighting with a zone controlled AC unit to maintain perfect storage conditions, and locked in a theft proof safe no less than 800 pounds.

- All cannabis that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached shall be stored in a 119 square foot room locked in a theft proof safe no less than 800 pounds until such products are destroyed.
- All room will be cleaned and maintained daily with regulated products and procedures approved by the 935 CMR Cannabis Control Commission. All personnel in the building must change into a full body plant handling suit prior to entering any room containing any plants regardless of its stage in life cycle.
- The growing operations will be help indoors in a fully metal enclosed and regulated building. There will be no windows, and only 2 entry/exit double locked doors to the building. All areas around the building will be treated with the necessary pesticides and animal traps. All personnel in the building must change into a full body plant handling suit prior to entering any room containing any plants regardless of its stage in life cycle. This will minimize infestation by insects, rodents, birds, and pests of any kind.
- In order to be compliant with the 935 CMR 500.110: Security Requirements for Marijuana Establishments, there shall be implementation of sufficient safety measures to deter and prevent unauthorized entrance into areas containing marijuana and theft of marijuana.
- The building is not located within 500 feet of a pre-existing public or private school providing education in kindergarten or any of grades one through 12, unless a city or town adopts an ordinance or by-law that reduces the distance requirement.
- All rooms containing plants will have limited access and will be identified as such.
- Each room with plants shall be controlled only by the seed to sale software BioTrack to maintain full accountability of each plant in the building.
- The building and all rooms will be under 24 hour video surveillance.
- The building will be outfitted with a central station motion detecting alarm system connected to the nearest law enforcement and emergency agencies.

E. Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold.

- 9 week flowering time strains:
 - A. Blue Dream, a sativa - dominant hybrid originating in California, has achieved legendary status among West Coast strains. Crossing a Blueberry indica with the sativa haze, Blue Dream balances full- body relaxation with gentle cerebral invigoration. Novice and veteran consumers alike enjoy the

level effects of Blue Dream, which ease you gently into a calm euphoria. Some Blue Dream phenotypes express a more indica - like look and feel, but the sativa- leaning variety remains most prevalent. With a sweet berry aroma redolent of its Blueberry parent, Blue Dream delivers swift symptom relief without heavy sedative effects. This makes Blue Dream a popular daytime medicine for patients treating pain, depression, nausea, and other ailments requiring a high THC strain.

- Effects:
 - a. Happy
 - b. Relaxed
 - c. Euphoric
 - d. Uplifted
 - e. Creative
- Flavors:
 - a. Blueberry
 - b. Sweet
 - c. Berry
- Hybrid- Sativa Dominant
- 550-650 g/m2 in SOG
- 9 weeks flowering time - Grows tall
- High yield 21oz/m2
- PH 5.5 - 500- 600 PPM
- THC 17%- 24% CBD 2%
- 60%- 70% Humidity 80F/Daytime 68F/Night Time
- \$135oz avg (worldwide) - \$2,160/pd

B. Headband is the love child of cannabis power couple, OG Kush and Sour Diesel. The smooth, creamy smoke is accented by flavors of lemons and diesel while the long- lasting effects are great for pain relief, helping you to relax, and to combat elevated stress levels. Many report that the effects create a slight pressure around the crown of their head and feels as though they are wearing a headband. The effects have been known to come on slow, so pace yourself with this potent hybrid.

- Effects:
 - a. Happy
 - b. Relaxed
 - c. Euphoric
 - d. Uplifted
 - e. Creative
- Flavors:
 - a. Diesel

- b. Lemon
- c. Earthy

- Hybrid- Indica Dominant
- 9 weeks flowering time - Grows medium height
- Yield 18oz/m2
- PH 5.5 - 6.0 500-600 PPM
- THC 20%- 27% CBD 0.07%- 0.2%
- 60%- 70% Humidity 80F/Daytime 68F/Night Time
- \$166oz avg (worldwide) - \$2,656/pd

- 11 week flowering time strains:

A. Super Lemon Haze is a sativa - dominant hybrid of Lemon Skunk and Super Silver Haze and two time Cannabis Cup winner from Green House seeds. Super Lemon Haze is a kief - caked multi - colored wonder. As the name states this strain has real lemony characteristics. The smell is zesty, citrusy, and a little sweet. As for taste, its everything one would expect from the namesake; tart and sweet like lemonheads candy - not quite as sharp as one might expect. The effects are uniquely energetic and lively, may not be the best strain for those of us that are naturally wound - up tight.

- Effects:
 - a. Energetic
 - b. Happy
 - c. Focused
 - d. Euphoric

- Flavors:
 - a. Lemon
 - b. Citrus
 - c. Earthy

- Hybrid - Sativa Dominant
- 500-600 g/m2 in SOG
- 11 weeks flowering time - -Grows medium/Tall
- Yield 28oz/m2
- PH 5.5 750 PPM
- THC 15%- 22% CBD 0-0.1%
- 60%- 70% Humidity 80F/Daytime 68F/Night Time
- \$150oz avg (worldwide) - \$2,400/pd

B. Sour Diesel sometimes called Sour D, is an invigorating sativa - dominant strain named after its pungent, diesel - like aroma. This fast - acting strain delivers energizing, dreamy cerebral effects that have pushed Sour Diesel to its legendary status. Stress, pain, and depression fade away in long -

lasting relief that makes Sour Diesel a top choice among medical patients. This strain took root in the early 90's, and it is believed to have descended from Chemdawg 91 and Super Skunk.

- Effects:
 - a. Happy
 - b. Energetic
 - c. Uplifted
 - d. Creative
- Flavors:
 - a. Diesel
 - b. Earthy
 - c. Pungent
- Sativa Dominant
- 400-500 g/m² in SOG
- 11 weeks flowering time - Grows Tall
- Yield 18oz/m²
- PH 5.5 750 PPM
- THC 22% CBD 0.20%
- 60%- 70% Humidity 80F/Daytime 68F/Night Time
- \$135oz avg (worldwide) - \$2,160/pd

- CBD Strain

A. Pennywise is a high CBD indica cross between Harlequin and Jack the Ripper, a combination that lends this strain its killer clown name. Four phenotypes of this Stephen King - inspired strain exist, some of which have fingerlike buds while others appear more round. Notes of coffee and pepper lift from the purple - fringed flowers with undertones of lemon and bubblegum. Rich in the therapeutic compound CBD, Pennywise is especially effective in treating arthritis, PTSD, epilepsy, neurological disorders, and cancer symptoms. It contains a 1;1 ratio of CBD and THC, so the psychoactive effects are milder and more relaxing. Jack the Ripper's cerebrally focused effects are detectable in Pennywise's genes as euphoria and mental clarity take over with an invigorating buzz.

- Effects:
 - a. Relaxed
 - b. Uplifted
 - c. Euphoric
 - d. Sleepy
 - e. Happy
- Flavors:

- a. Earthy
- b. Pine
- c. Coffee

- Hybrid - Indica Dominant
- 9 weeks flowering period - Grows medium height
- Yield 12-16 oz/m²
- PH 5.5 750 PPM
- HC 12-15% CBD 12-15%
- 60%-70% Humidity 80F/Daytime 68F/Night Time
- \$120oz avg (worldwide) - \$1,920/pd

F. Procedures to ensure accurate record keeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9).

- JCC CCO shall work with each section manager (cultivation and processing) to ensure that all logs are utilized and maintained to track all facility workflow.
 - Visitor Log - JCC CCO is responsible for ensuring any authorized personnel visiting the cultivation facility uses a visitor log.
 - Cleaning Log – The DoH is responsible for overseeing the use of daily cleaning logs to track cleaning within all zones of the cultivation facility.
 - Maintenance Log – A facility maintenance log will be utilized to track maintenance and upkeep on all equipment within the cultivation facility.
 - Light Intensity Log – To ensure all cultivation facility lighting is maximized, the light produced by each lamp must be checked on a monthly basis by the cultivation facility staff. The IM shall work with each zone manager to measure lighting throughout each cultivating zone in the cultivation facility.
 - Pest Control Log – Plant cultivation zone managers will be responsible for tracking and logging all pest and disease control measures within the cultivation facility.
 - Feed Schedule Change Log – Plant cultivation zone managers will be responsible for tracking feeding schedules in all cultivation zones for which they are responsible. Any change or variance in the respective plant-zone feed schedule must be noted and brought to the attention of the DoH.
 - Transplant Log – The transfer log tracks all plant movement throughout the cultivation facility. The Vegetation Agent (VA) is responsible for tracking plant movements before flowering begins.

- Harvest Log – All flowering zone harvest schedules are tracked on the JCC harvest log. The flowering zone management team is responsible for updating this log and noting any variances for the DoH.
- Daily Inspection Log – All zone managers are responsible for performing daily inspection and communicating all variances to the DoH. All zones must comply with the information designated in the quality control section. The daily inspection log includes:
 - Room temperature
 - Humidity
 - CO2
 - Electrical and lighting
 - Pest and disease
 - Photoperiod
- Curing Log – A curing log shall be maintained by the IM to track the time specific strains and batches are in the curing area. In addition to time, environmental conditions such as temperature and humidity are all recorded.
- Testing Log – A testing log shall be maintained by the IM to keep track of all batches, their respective test dates, and results.
- Finished Batch Log – The following information shall be collected pursuant CMR 500.130 in order to maintain records for company research and development, tracking purposes, as well as relaying all pertinent data to the dispensary to which any part of a batch is sold.
 - For each batch of cannabis cultivated, the following information shall be collected:
 - a. Batch number.
 - b. Batch origination from cannabis seed or cannabis cuttings.
 - c. Strain of cannabis seeds or cannabis cuttings planted.
 - d. Number of cannabis seeds or cannabis cuttings planted.
 - e. Date the cannabis seeds or cannabis cuttings planted.
 - f. List of all chemical additives used in the cultivation, including, without limitation non-organic pesticides, herbicides, and fertilizers.

- g. Number of cannabis plants grown to maturity.
- h. Harvest information, including without limitation:
 - i. Date of harvest.
 - ii. Final yield weight of processed usable cannabis.
 - iii. Name and cannabis establishment agent registration card number.

G. Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160.

- Quality control will be handled every harvest by sending off samples from each strain to a testing facility for quality and THC potency.
- All reports from testing will be analyzed by the DoH and recommendation for improvements will be reported to the COO. Once approved, the DoH will begin changes. If a decrease or increase in nutrient levels or supplements, the DoH will report changes to the IM.
- Environment and Quality Control Propagation materials used in cultivation operations will be appropriate for use in food production. Cultivation operations will follow the propagation material manufacturer's usage and storage recommendations. To achieve these high standards, JCC is engineered for year-round production.
- All cultivation rooms are all capable of maintaining constant environmental conditions including temperature, humidity, and CO2. In addition, fresh air is introduced through an advanced smell-eliminating air flow system that works in conjunction with other controls such as UV light to avoid all mold, bacteria, mildew, and fungal outbreaks.
- A closed loop ventilation system will lessen the potential of pest contamination and reduce the need for any organic pesticides. The microclimate within each section of JCC must be constantly maintained in order to prevent pest and disease and achieve the highest and purest quality.
- After curing and before any processing or packaging, the processing manager shall make samples from each batch available to an independent laboratory for testing.
 - A. The sample shall be weighed, RFID scanned, and all data shall be recorded on the SIS prior to be removed from the secured curing area.

- B. The laboratory employee will select and prepare several random samples from every batch sample in order to ensure the quality, purity, and consistency of dose through a statistical approach.
- C. The laboratory staff will then test each random sample for harmful microbiological contaminants, mycotoxins, heavy metals and pesticide chemical residue.
- D. Each sample will also be tested for active ingredients including but not limited to cannabinoid profiling for the following: THC, THCa, CBD, CBDa, and CBN.
 - a. Under no circumstances shall cannabis batches awaiting contamination results and active ingredient analysis be included in a cannabis product or sold to a retail dispensary facility prior to the time that the laboratory has provided those results, in writing, to the dispensary management team.
 - b. If samples from a batch are tested and do not fall within state accepted health and safety levels for any of the above-mentioned contaminants or any additional contaminants the state does not deem for distribution, it is the dispensary's policy to destroy and remove any contaminated product in a manner consistent with state compliance for the policy for disposal of green waste.
- E. As soon as a batch sample passes the microbiological, mycotoxin, heavy metal and pesticide chemical residue test, the entire batch will be released for immediate manufacturing, packaging and labeling for transport and sale to a dispensary facility.
- F. An electronic copy of all test results will be filed by laboratory staff for any batch that does not meet the standards set for microbiological, mycotoxin, heavy metal or pesticide chemical residue tests.
- G. These results will also be sent to dispensary staff within the same time frame.
- H. The laboratory staff will also maintain a comprehensive record of test results and make them available to state and local officials, and or the public, as needed.
- I. The Chief Compliance Officer (CCO) will provide test results for each batch of cannabis used in any product purchased by a dispensary facility to that dispensary facility to be made available upon request to all qualifying

patients, primary caregivers, and any physician who has certified a qualifying patient.

H. A staffing plan and staffing records in compliance with 935 CMR 500.105(9).

- All staff JCC plans to employ that necessary for full operations include but not limited to CEO, COO, CSO, CCO, CFO, DoH, cultivation manager, vegetation agent, clone agent, flowering zone agent, processing manager, packaging team lead, packaging agent, logistical manager, inventory manager.
- All employees must be hired based on JCC position qualifications including but not limited to Job descriptions for each employee and volunteer position, as well as organizational charts consistent with job descriptions.
- A personnel record for each marijuana agent must be kept and maintained for minimum 12 months after termination of the individual's affiliation with JCC.
 - A. All materials submitted to the Commission pursuant to 935 CMR 500.3030(2).
 - B. Documentation of verification of references.
 - C. The job description of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time and place he or she received said training and the topics discussed including the name and title of the presenters.
 - D. Documentation of periodic performance evaluations.
 - E. A record of any disciplinary action taken.
 - F. Notice of competed responsible vendor and 8 hour related duty training.
- A staffing plan that will demonstrate accessible business hours and safe cultivation conditions.
- Personnel policies and procedures.
- All background check reports obtained in accordance with 935 CMR 500.030.

I. Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies.

- Definitions:

- A. Disaster/Emergency is any situation that interrupts the normal flow of business.
- B. Disaster/Emergency supplies will include flashlight, first aid kit, battery operated radio, spill containment kit, smoke detection system and fire extinguishers.
- C. R.A.C.E. This acronym will be followed when responding to a disaster or emergency.
 - R. Rescue/remove anyone in immediate danger
 - A. Activate local emergency services by calling 911. In the event of a fire attempt to extinguish with proper equipment
 - C. Close doors, if appropriate, to contain any noxious substances
 - E. Evacuate building if needed
- Procedure:
 - A. Staff will comply with Center policies and procedures.
 - B. CEO or Designee will train Staff in response to disaster or emergency that may occur in the Center following the R.A.C.E. method if appropriate.
 - C. CEO or Designee will implement and document on the Disaster/Emergency Report form the occurrence of disaster/emergency drill twice during the calendar year.
 - D. Staff will participate in disaster/emergency drill.
 - E. CEO or Designee will ensure the Center has basic emergency equipment including fire extinguishers, flashlight, first aid kit, battery operated radio and smoke detection system.
 - F. Staff will call local emergency services (911) to assist when needed.
 - G. Staff trained in CPR/First Aid will provide emergency medical assistance as needed.
 - H. Staff will promptly notify CEO in the event of any Medical Emergency.
 - I. Staff will exit facility and report to the designated relocation area in the event of a Disaster/Emergency.

- J. Staff will complete Disaster/Emergency Report form after such occurrence.
- K. CEO or Designee will review Disaster/Emergency Report and notify Board and insurance company if appropriate.
- L. Facility is a smoke free facility and will not store flammable solvents or highly combustible materials.
- M. Staff will ensure electrical equipment is in good repair or remove from use if there is any safety concern.
- N. Fire Emergency: If fire is small and isolated, try to exhaust the fire with one of the fire extinguishers. In case of a fire emergency, dial 911 for Fire Department.
- O. Chemical Spill: Try to use chemical spill kit for smaller incidents of chemical spill. If chemical spill is large or you do not know how to handle the situation, notify your manager.
- P. Other Emergencies: Contact 911 for break-ins or burglaries.

J. Alcohol, smoke and drug-free workplace policies.

- To assure a safe, clean, healthy environment in which to work, JCC will remain free of chemical (tobacco, alcohol and drug) use in compliance with the Massachusetts Clean Air Act and The Drug-Free Workplace Act.

A. Definitions:

- Tobacco includes smoking or chewing of tobacco products.
- Alcohol consumption is the intake of any intoxicating beverage containing ethanol.
- Drug includes the possession, use or distribution of any chemical substance that adversely affects work performance or safety due to impaired alertness, coordination, judgment, decision making, reaction, response or effort.

B. Procedure:

- Staff will comply with this policy while on the premises to ensure safety and optimal work performance.
- CEO or Designee will promptly request anyone in violation of this policy to immediately leave the facility.

- Staff will report to local law enforcement (and Commission where applicable) any known possession of any illegal drug by anyone on premises.

K. A plan describing how confidential information will be maintained.

- The records room containing confidential information will be maintained behind two double locked doors and under 24 hour HD video surveillance and only accessible by JCC's CSO and COO.

L. A policy for the immediate dismissal of any JCC agent who has:

- Diverted marijuana, which shall be reported to law enforcement officials and to the Commission.
- Engaged in unsafe practices with regard to operation of JCC, which shall be reported to the Commission.
- 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.

M. A list of all board members and executives of JCC and members, if any, of the licensee must be made available upon request by any individual. 935CMR 500.105 (1)(m) requirement may be fulfilled by placing this information on the JCC website.

- Reginald Stanfield
- Terrance Hanley
- Che'toia Walker
- Jonathan Siberon
- Chederis Polanco
- Adam Richichi
- Alan Sorin

N. Policies and procedures for the handling of cash on JCC premises including but not limited to storage, collection frequency, and transport to financial institution(s).

- Upon receiving payments from dispensaries:
 - A. Transport agent will immediately log, report, and place cash in safe lock box.
 - B. Lock box will then be locked inside of attached vehicle lock box.

- C. Transport agents will follow JCC transport protocol to return to JCC center.
- D. Upon arrival, the cash shall be confirmed as reported under recorded HD video camera surveillance by CSO.
- E. Once properly confirmed and recorded, cash will then be taken to the security room and placed in an 800+ pound 1 hour fire proof safe until transport to bank is required.

- Bank deposits:

- A. Upon removal of cash from the safe, the cash will be reported and logged under recorded HD video camera surveillance by the CSO.
- B. Once logged, the cash shall be placed inside a safe lock box.
- C. Transport agent will then place lock box inside of the lock box attached to the vehicle.
- D. Transport agents will follow JCC transport protocol to transport the cash to required bank.
- E. Upon arrival of the bank. Transport agent will then log and report the cash to be deposited.
- F. Transport agent must obtain receipt of deposit, and report confirmation immediately.

O. Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.

- Restricting Access to age 21 and older:

- A. Age Limit and restriction is important to maintain the health and wellbeing of all individuals under the age of 21 years old. We will use the methods below to help ensure our product does reach under age individuals.
- B. 1. Labeling the product correctly and legible will be key so that there is no confusing our products. Even though our product will only be sold to dispensaries and manufactures, labeling can help deter and promote under age restrictions.
- C. Training will allow our employees and owners the ability to demonstrate how the handling of products should be done at all time. Once everyone is properly trained the possibility of error will decrease substantially.

- D. For all visits to the facility, each person must be ID and documented.
- E. Documentation will provide an important part of restriction, documenting everyone who visits and leaves, if for any reason, a minor enters the facility we will have documentation to review and find a solution to how the incident can be avoided in the future.
- F. Updated examples of the minimum age ID required.

P. Policies and procedures for energy efficiency and conservation that shall include:

- Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities.

A. Water consumption:

- Water will be used then run through a reverse osmosis filtration system that can produce and filter out 500 gallons daily, we are only expecting to use 350-400 gallons per watering and filtering the used water will help reduce water us. Any time the water tank has been compromised, the tank must be drained and ran through the reverse osmosis filter.

B. Electricity consumption, strategies and engagement:

- Instead of using HPS lights we have already secured services of a rebate program for energy savings. Cutting our power usage in half by switching to LED.
- Minimizing par value needed during Veg per plant cycle, some plants only need certain par and instead of running a base par for all plants, taking the time to record par and plant growth will give us a précised par that can be lowered and save energy.

C. Environmental controls:

- With specialized ventilation and HVAC systems in place, additional energy savings can be expected due to the increased efficiency of said systems. In addition, by introducing fresh air through an advanced smell-eliminating air flow system in conjunction with other controls such as UV light we are able to avoid all mold, bacteria, mildew, and fungal outbreaks. Our closed loop ventilation system will lessen the potential of pest contamination and reduce the need for any additional organic pesticides.

- Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable.

A. Solar panels have been considered but ruled out at this time as it is cost prohibitive. Plans to implement within 3-5 years.

2. Inventory records as required by 935 CMR 500.105(8).

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

A. JCC shall:

- Establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of marijuana products in the process of cultivation, and finished, stored marijuana.
- Conduct a monthly inventory of marijuana in the process of cultivation and finished, stored marijuana.
- Conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory.
- Promptly transcribe inventories if taken by use of an oral recording device.

B. The record of each inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.

C. JCC shall tag and track all marijuana seeds, clones, plants, and marijuana products, using a seed-to-sale methodology in a form and manner to be approved by the Commission.

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

- E. A marijuana establishment that is cultivating, processing or selling marijuana products for medical use as well as marijuana products for adult use must create virtual separation of the products.

At the point of sale, a Marijuana Retailer that is also a RMD must designate whether marijuana products are intended for sale for adult use or medical use through tracking methodology approved by the Commission under 935 CMR 500.000. (h) A Marijuana Retailer that is also a RMD is subject to the laws governing taxation in the Commonwealth, including, but not limited to, the laws regarding taxation, filling, audit and seizure.

3. Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e).

- The seed to sale process shall be tracked with BioTrack. This is a software that automatically Reports Required Data to State System's, creates custom compliance-focused reports, tracks waste, destruction and accounts for conversion and moisture losses, creates transport manifests with all necessary information, does real time product recall, and much more. With this system, the seed to sale tracking process will be effortless, efficient, secure, and compliant with the CCC regulations and state laws.
 - A. Label and tag each seed with RFID to be logged and tracked in the inventory system.
 - B. Record and scan in all essential information per seed on manual log sheet and in Biotrack.
 - C. Place all seeds in clone room after logging complete.
 - D. Once seed grows into plant and is ready for vegetation phase, that plant will be scanned out of the clone room with necessary information logged on manual log sheet and in Biotrack.
 - E. Once scanned out of clone room, immediately scan into vegetation room with necessary data logged both on the manual long and in Biotrack.
 - F. Once plant is ready for flower phase, that plant will be scanned out of the vegetation room with necessary information logged on manual log sheet and in Biotrack.
 - G. Once scanned out of vegetation room, immediately scan into flowering room with necessary data logged both on the manual long and in Biotrack.

- H. Once plant has flowered and is ready for harvest, that plant will be scanned out of the flowering room with necessary information logged on manual log sheet and in Biotrack.
- I. Once scanned out of flowering room, immediately scan into trimming room with necessary data logged both on the manual long and in Biotrack.
- J. Once plant has been trimmed, that plant will be scanned out of the trimming room with necessary information logged on manual log sheet and in Biotrack. All plant matter will be disposed of through green waste and tracked accordingly.
- K. Once scanned out of trimming room, immediately scan into curing room with necessary data logged both on the manual long and in Biotrack.
- L. Once curing process is complete, that plant will be scanned out of the curing room with necessary information logged on manual log sheet and in Biotrack.
- M. Once scanned out of curing room, immediately scan into storage room with necessary data logged both on the manual long and in Biotrack. Securely store each plant and lock plants in commercial grade safe.
- N. Once plants are ready for sale, that plant will be scanned out of the storage room with necessary information logged on manual log sheet and in Biotrack.
- O. In preparation of packaging and transporting, all inventory must be weighed, logged, and accounted for, on video. When videotaping the weighing, logging, and accounting for marijuana products, the video must show each product being weighed, the weight, and the manifest.
- P. Package plants in sealed, labeled, and tamper or child-resistant packaging, and place in secured lock box attached to transport vehicle.
- Q. A manifest shall be filled out in triplicate, with the original manifest remaining with the originating Marijuana Establishment, a second copy provide to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transportation. Prior to transport, the manifest shall be securely transmitted to the destination Marijuana Establishment by facsimile or email.
- R. Upon arrival at the destination Marijuana Establishment, a marijuana establishment agent at the destination Marijuana Establishment shall

compare the manifest produced by the agents who transported the marijuana products to the copy transmitted by facsimile or email.

- S. Once product has been delivered to destination establishment, money will immediately be stored and placed in secured lock box attached to transport vehicle.
- T. Transport agents will immediately return to origination facility. Every 30 minutes in route, transport agents must contact originating facility to report status check until arrival.
- U. Once arrived, money must be placed immediately into commercial safe.

4. The following personnel records:

- Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions.
- A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2).
 - Documentation of verification of references.
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision.
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters.
 - Documentation of periodic performance evaluations.
 - A record of any disciplinary action taken.
 - Notice of completed responsible vendor and 8 hour related duty training.
- A staffing plan that will demonstrate accessible business hours and safe cultivation conditions.
- Personnel policies and procedures.
- All background check reports obtained in accordance with 935 CMR 500.030.

5. Business records, which shall include manual or computerized records of:

- 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.
- Salary and wage 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 JCC, including members of the nonprofit corporation, if any.

6. Waste disposal records as required under 935 CMR 500.105(12).

- JCC will ensure all recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, shall be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.
- Liquid waste containing marijuana or by-products of marijuana processing shall be disposed of in compliance with all applicable state and federal requirements, including but not limited to, for discharge of pollutants into surface water or groundwater (Massachusetts Clean Waters Act, M.G.L. c. 21 §§ 26 through 53; 314 CMR 3.00: Surface Water Discharge Permit Program; 314 CMR 5.00: Groundwater Discharge Program; 314 CMR 12.00: Operation Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Dischargers; the Federal Clean Water Act, 33 U.S.C. 1251 et seq., the National Pollutant Discharge Elimination System Permit Regulations at 40 CFR Part 122, 314 CMR 7.00: Sewer System Extension and Connection Permit Program), or stored pending disposal in an industrial wastewater holding tank in accordance with 314 CMR 18.00: Industrial Wastewater Holding Tanks and Containers.
- Organic material, recyclable material and solid waste generated at a Cannabis Establishment shall be redirected or disposed of as follows:
 - Organic material and recyclable material shall be redirected from disposal in accordance with the waste disposal bans described at 310 CMR 19.017: Waste Bans.
 - To the greatest extent feasible:
 - Any recyclable material as defined in 310 CMR 16.02: Definitions shall be recycled in a manner approved by the Commission.

- Any remaining marijuana waste shall be ground and mixed with other organic material as defined in 310 CMR 16.02: Definitions such that the resulting mixture renders the marijuana unusable for its original purpose. Once such marijuana waste has been rendered unusable, the mixture may be composted or digested at an aerobic or anaerobic digester at an operation that is in compliance with the requirements of 310 CMR 16.00: Site Assignment Regulations for Solid Waste Facilities.
- Solid waste containing cannabis waste generated at a marijuana establishment may be ground up and mixed with solid wastes such that the resulting mixture renders the cannabis unusable for its original purposes. Once such cannabis waste has been rendered unusable, it may be brought to a solid waste transfer facility or a solid waste disposal facility (e.g., landfill or incinerator) that holds a valid permit issued by the Department of Environmental Protection or by the appropriate state agency in the state in which the facility is located.
- No fewer than two JCC agents must witness and document how the marijuana waste is disposed or otherwise handled (recycled, composted, etc.) in accordance with 935 CMR 500.105(12). When marijuana products or waste is disposed or handled, the Marijuana Establishment must 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.

7. Following closure of JCC, all records must be kept for at least two years at the expense of JCC and in a form and location acceptable to the commission.

Measurement & Accountability

1. JCC will hold audits weekly, monthly, annually, as required by the state of Massachusetts for the following: security measures, employee security policies, storage of marijuana, accurate descriptions of all strains, quality control plans, staffing plans and staffing records, alcohol, smoke, and drug-free policies, plan for confidential records keeping, dismissal of agents policy, list of all board members, handling of cash policy, diversion prevention of persons under 21 policy, policies and procedures for energy efficiency and conversion, personnel records, business records, waste disposal records, and closure records data base.
2. JCC will regularly report all records and audit of above mentioned to necessary parties as required by the state of Massachusetts.
3. All employees must undergo necessary trainings in their respective departments to maintain efficient competency.

Maintenance of Financial Records Compliance Plan

The top priorities for JustinCredible Cultivation (JCC) are public safety and creating positive impact within the community. To accomplish this, JCC has established operational systems that ensure best practices are consistently followed and compliance expectations are met.

Compliance Plan Goal

1. Short term goals:

- a. Create and maintain business records of assets and liabilities, monetary transactions, books of accounts, sales records, and salary and wages of employees in accordance with GAAP guidelines and standards to begin successful records keeping for proper CCC compliance.
- b. In accordance with 935 CMR 500.140(9), no marijuana product, including marijuana, may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. The product must be deemed to comply with the standards required under 935 CMR 500.160. JCC will create financial records outlining all transactions with Independent Testing Laboratories.

2. Long term goals:

- a. Remain financially responsible, ensure the best business practices, be fully prepared for all audits, and to remain compliant with the CCC.
- b. Maintain detailed and accurate financial records outlining all transactions with Independent Testing Laboratories to ensure all products produced and sold by JCC remains compliant and in good standing with the CCC.

Program Policy & Procedures

- 1. While as a cultivation facility, 935 CMR 500.140 (6) is not applicable as it pertains solely to retail facilities, JCC will create and maintain the following financial records policies and procedures for the handling of cash on JCC premises including but not limited to storage, collection frequency, and transport to financial institution(s).**

- Upon receiving payments from dispensaries:
 - A. Transport agent will immediately log, report, and place cash in safe lock box. This two-step process is as follows:
 - a. Once agent has received receipt, agent will manually enter transaction on the written log located in transport vehicle.

- b. Once agent has manually logged transaction, agent will contact via phone said transaction to agent at originating facility at which time the transaction will be logged into a digital system.
 - B. Upon arrival, the transaction will be confirmed by the CSO and reported under recorded HD video camera surveillance.
 - C. Printed reports outlining all transactions will be provided to CEO for an internal audit in accordance with the requirements outlined by the State of Massachusetts.
- Bank deposits:
 - A. Transport agents will follow JCC transport protocol to transport the cash to required bank. Upon arrival of the bank. Transport agent will then log and report the cash to be deposited.
 - B. Transport agent must obtain receipt of deposit, and report confirmation immediately. This two-step process is as follows:
 - a. Once agent has received receipt, agent will manually enter transaction on the written log located in transport vehicle.
 - b. Once agent has manually logged transaction, agent will contact via phone said transaction to agent at originating facility at which time the transaction will be logged into a digital system.
 - C. Printed reports outlining all transactions will be provided to CEO for an internal audit in accordance with the requirements outlined by the State of Massachusetts.

2. In accordance with 935 CMR 500.140 (9), JCC has established the following financial records policies and procedures for outlining all transactions with Independent Testing Laboratories.

- Tracking transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13) is as follows:
 - Each plant is assigned an RFID and tracked in a digital recording system.
 - Product for testing will be grouped into a batch, at which time all RFIDs will be registered to said batch number and entered into digital recording system.
 - Upon payment of testing services, using a PO system, each batch and subsequent RFID will be assigned a PO number which will track all payments made to Independent Testing Laboratories.

- Printed reports outlining all transactions will be provided to CEO for an internal audit in accordance with the requirements outlined by the State of Massachusetts.

Measurement & Accountability

JCC will hold audits weekly, monthly, annually, as required by the state of Massachusetts for the maintenance of all financial records systems.

1. JCC will regularly report all records and audit of above mentioned to necessary parties as required by the state of Massachusetts.
2. All employees must undergo necessary trainings in their respective departments to maintain efficient competency.

JustinCredible Cultivation, LLC

To: The Woman's Fund
From: Reginald Stanfield
CC: Cannabis Control Commission

The purpose of this document is to record the proposed donation from JustinCredible Cultivation, LLC to the Women's Fund of Western Massachusetts.

I, Reginald Stanfield, CEO of JustinCredible Cultivation, hereby pledge **one percent** of our annual sales to the non-profit organization named The Women's Fund of Western Massachusetts.

WOMEN'S FUND of Western Massachusetts
1350 Main St, Suite 1006
Springfield, MA 01103
(413) 529-0087

I, Donna Haghighat, of WOMEN'S FUND of Western Massachusetts, hereby accept the **one percent** pledge as stated in this document.

JustinCredible Cultivation

X 

Women's Fund of Western Massachusetts

X  4/17/19

2021

JustinCredible Cultivation Qualifications & Trainings Guide



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JustinCredible Cultivation Positions and Qualifications

CHIEF EXECUTIVE OFFICER

Qualifications: Bachelor's in a Business focused major, including 24 hours of management experience. With at least 4 years of experience in management positions. Developing a business from ground up. Some experience in horticulture. No felony or violent crime convictions.

Responsibilities: The CEO, being the visionary, is an extremely important role in every company, setting the tone for the company while upholding compliance and standards set forth in our SOPs and company bylaws. The CEO will be the face and median between the company and the community. Making sure the communities expectations are being met and there are no concerns that need to be addressed. The CEO will be an active worker on the day by day operations of JCC. Closing and opening the cultivation facility each morning will be the personal duty of the CEO for the first year of operation.

CHIEF OPERATIONS OFFICER

Qualifications: Bachelor's in Business, Logistics, Organization, or Communication. At least 4 years of organization experience, or business management experience. No felony or violent crime convictions.

Responsibilities: The COO, also known as the Chief Organization Officer, must manage the operations of the business practices of JCC. He/she must know every code, regulation, and standard operating procedure implemented by JCC and its Board Members. The COO is responsible for tracking all items brought in and out of the facility, overseeing the community outreach programs, and charitable programs planned by JCC and its Board Members.

CHIEF SECURITY OFFICER

Qualifications: Bachelor's in Security Management, Criminal Justice or Military Experience. At last 4 years of security or military experience. No felony or violent crime convictions.

Responsibilities: The CSO is responsible for the security of the cultivation facility and overseeing the transactions between dispensaries and manufacturers. The CSO will be the second key holder to open and close the facility. The CSO will make the schedule for security rotation and monitoring the 24/7 security system. The CSO must background check and clear all visitors inside of the facility.

CHIEF FINANCIAL OFFICER (VACANT)

Qualifications: Bachelor's in a Business focused major, including 24 hours in either Accounting or Finance courses. At least 4 years of Bookkeeping & Financial Statements and developing & tracking sales or invoices for a company with at least one million dollars of transactions. No felony or violent crime convictions.

Responsibilities: The CFO oversees financial record keeping and bookkeeping, tracking every sale, and weekly reporting to the Board of Directors. The CFO will also be in person for the company's first 5-10 sales, taking the time to monitor each potential manager who will receive payments from dispensaries and manufacturers. The CFO will also oversee the seed-to-sale process.

- Identification of Financial Records
- Financial Record Generation
- Financial Recordkeeping and Traceability
- Financial Record Retention and Long-Term Storage
- Financial Record Maintenance

CHIEF LOGISTICS OFFICER

Qualifications: Bachelor's in Logistics or Communications; At least 4 years of planning and managing a team of skilled workers.

Responsibilities: The LM will oversee all the internal logistic of the cultivation facility. Doing quarterly audits of the facility, which includes seed-to-sale, compliance and financial records on a macro level.

HEAD HORTICULTURALIST

Qualifications: Bachelor's in Horticulture, or ten to twelve years related experience and/or training, or equivalent combination of education and experience. Must be able to pass applicable background checks, and agree to comply with policies, procedures, and confidentiality requirements as set forth by the employer.

Responsibilities: The Director of Horticulture (DoH) will drive the long-range strategic planning process for operations by overseeing and managing all horticulture operations, including horticulture itself, and inventory control. The DoH will be responsible for the product life cycle management, maintaining quality, safety, and regulatory compliance relating to the horticulture facilities. Additionally, the DoH will be involved in the development of operations-related plans, capacity, infrastructure, and procedures.

CULTIVATION MANAGER

Qualifications: Bachelor's or Associate degree from a college/university, or 5 years of experience managing horticulture and individuals. The individual's background should be within management, preferably in the agriculture field. He/she needs to be able to oversee a team of individuals to ensure all plants are ready and harvesting on schedule.

Responsibilities: The Cultivation Manager (CM) is responsible for executing protocols and standard operating procedures (SOPs) for all phases of cultivation, including: propagation, vegetative, flowering, and harvest. Must maintain cleanliness standards and oversee daily inspections and inventory management. Must be able to maintain safe working practices and report occurrences of diversion and loss or workplace hazards immediately.

COMPLIANCE MANAGER

Qualifications: Bachelor's in Business Ethics or Administration. At least 4 years of compliance or regulation, holding leadership positions where the applicant must follow state or board mandated regulations. No felony or violent crime convictions.

Responsibilities: The Compliance Manager oversees all compliance procedures.

PRODUCTION MANAGER

Qualifications: Bachelor's or Associates degree from a college/university, or 5 years of experience managing multiple teams of individuals and handling customer and vendor relations. The individuals background should be within management, preferably commercial/industrial sector. He/she needs to be able to oversee daily operations and assistance with orderly compliance.

Responsibilities: The Production Manager (PM) is responsible for the overall production output of the operation. The PM will handle scheduling, supervising, coordinating with, and supporting all aspects of the production lifecycle.

FACILITY MANAGER

Qualifications: The Facility Manager (FM) should have a High School Diploma at minimum or equivalent and 7 years of related experience managing facilities.

Responsibilities: The individual is responsible for making sure that the building meets the needs of the people that work in them. Facilities managers are accountable for services such as cleaning and parking, to make sure the surrounding environment is in a suitable condition to work. He/she will also manage any building maintenance with things like heating and air conditioning, to maintain the working environment.

CULTIVATION AGENT

Qualifications: The Clone Agent should have a high school diploma at minimum or an equivalent. The individual should have an interest in understanding the clone stage of the cultivation of cannabis. He/she needs to be able to collaborate with team members to ensure success of their area.

Responsibilities: The Clone Agent ensures that the demand for new clones of the appropriate strains is propagated in a manner consistent with the CCO's schedule for production.

PACKAGING TEAM LEAD (VACANT)

Qualifications: The Packaging Team (PT) Lead must have a bachelor's or Associate degree from a college/university. The individual's background should be within management, preferably in the agriculture field or packaging industry. Or 5 years of experience within packaging, inventory and/or storage. He/she needs to be able to oversee a team of individuals to ensure all packaging is ready and on schedule for delivery to dispensaries.

Responsibilities: The PT Lead ensures the packaging of all products of the facility are labeled and packaged correctly in order to meet the demands of the customers. The packaging team is responsible for all daily packaging operations at the cultivation facility. This includes, but is not limited to, supervision of team members; inventory control; compliance with laws and regulations; packaging forecasting; health, safety and sanitation requirements; and other various duties.

INVENTORY AGENT (VACANT)

Qualifications: 4 years of inventory and merchandise; No felony or violent crime convictions.

Responsibilities: The inventory manager will oversee all inventory, including equipment, water levels and unsold merchandise.

SANITATION LEAD

Qualifications: High school diploma or equivalent; No felony or violent crime convictions.

Responsibilities: The sanitation lead will assist the facilities manager with all duties associated with the sanitation and over cleanliness of the building, including equipment, and PPE.

SANITATION TECHNICIAN (VACANT)

Qualifications: High school diploma or equivalent; No felony or violent crime convictions.

Responsibilities: The sanitation tech will assist the facilities manager with all duties associated with the sanitation and over cleanliness of the building, including equipment, and PPE.

JustinCredible Cultivation Trainings

SECURITY TRAINING

Under the compliance governance, the JCC Chief Compliance Officer will oversee and facilitate the following trainings:

- Seed-to-sale process
- Tracking requirements
- Securely locking the cultivation facility
- Handling visitors
- Room area maintenance
- Emergency Protocols
- Waste Disposal guidelines
- Quality control procedures

COMPLIANCE TRAINING

Under the compliance governance, the JCC Director of Horticulture will oversee and facilitate the following trainings:

- Packaging procedures
- Storage procedures
- Securing and Transporting product
- Labeling process
- Pest control & disease management

OPERATIONS TRAINING

The Chief Operations Officer will oversee and facilitate the following meetings and trainings:

- Weekly staff meetings
- Daily Shift meetings
- Record keeping
- Cannabis basic needs
- Cultivation procedures

LOGISTICS

The Chief Logistics Officer will oversee and facilitate the following:

- Inventory tracking
- Initial Inventory documenting
- Weekly Inventory processes
- Monthly Inventory processes
- Sales and Disposable recording procedures
- Identifying Inventory discrepancies

Diversity Plan

In accordance with 935 CMR 500.101(1)(b)(10), JustinCredible Cultivation, LLC (JCC) has developed short term and long-term plans to provide diversity opportunities for its staff in Cummington, and the surrounding cities of Massachusetts. These opportunities will increase the number of Veteran, Women, LGBTQ+, and other minority groups working in the Cannabis industry.

Overall Goals:

1. Increasing the number of employees that fall into the demographics of minorities, veterans, women and individuals of the LGBTQ+ community that are employed with JCC.
2. Provide a stable learning environment for employees, being sure to include those who fall into the minority demographic.
3. Create an equity-based hiring and retention process.
4. Offer mentorships.
5. Conduct Business-to-Business transactions with the demographics of minorities, veterans, women and individuals of the LGBTQ+ community business owners to provide steady business.

SUMMARY

1. JCC Employee Retention - Promote employees using proper ethics, based upon employee quarterly reviews, not just seniority status. This will give every employee an equal and equity-based opportunity at furthering their career with JCC.
2. Anonymous Feedback - We will receive feedback on anonymous comment cards, that will provide the management team with the ability to create and maintain a positive business environment and a productive, supportive, and "employee first" business culture.
3. JCC On-the-Job Training – We will employ driven and ambitious employees with little, to no, experience in order to offer immediate opportunities for growth through out on-the-job training. The trainings will be sure to cover the following criteria: cultivation, maintenance, management, and compliance.
4. JCC Networking Program – JCC executive staff will all be a part of organizations that promote cannabis cultivation to the demographics of minorities, veteran, women, and individuals of theLGBQT community. We will also plan and host events, that raise awareness to the opportunities in the cannabis industry and also partner with local businesses who identify with the aforementioned demographics.
5. JCC Outreach Program – We will develop our Community Team, with the mission of attending community events and job fairs in order to attract potential employees that are within the demographics of minorities, veterans, women, and individuals of the LGBQT community.

MEASUREMENTS

JCC Board members will hold strict standards for the management team to meet, which will guarantee the company is completing the goals stated within this document. The metrics include, but are not limited to, the following:

1. No less than 80% of total employment, job creation, and expansion shall be from the demographics of minorities, veteran, women, and individuals of the LGBTQ+ community broken down by the following:
 - **50%** women (in all roles, including management and C-suite)
 - **60%** minority (with a high focus on individuals in the Pittsfield, Springfield, and Holyoke areas)
 - **20%** veterans
 - **15%** LGBTQ+
2. Number of individuals hired cannot decrease the percentage of the employees belonging to the demographics of minorities, veterans, women, and LGBTQ+ community shall not decrease. In order to ensure meeting the employment expectation, we will record and store data on all persons who have applied, interviewed, been hired, and terminated. We will also keep record of the type of positions created and offered.
3. JCC will attend at least 2 events per year with their community outreach program.
4. JCC will contract with at least 1 business that will provide JCC with its Business-to-Business needs (supplies and wholesale) from companies owned by people from the demographics of minorities, veterans, women, and LGBTQ+ community.
5. JCC is required to hold an employee 'satisfaction and work environment' rating above a seven out of ten possible points. If the rating falls below a seven, JCC staff are required to show all changes in management behavior or work environment, and report directly on how it will increase ratings. Ratings must not be below a seven for four consecutive quarters or three out of four quarters in one year.
6. JCC will have a ZERO tolerance for promoting without following its designated promotion policies.
7. All plans and programs shall be reviewed and audited in order to assess plans, progress, and success, and shall be prepared for submission to the Commission.
8. JCC 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.
9. Any and all actions taken, or programs instituted, by JCC will not violate the Commission's regulations with respect to limitations on ownership, or control, or other applicable state laws.

AFFIRMATIVE STATEMENT

JCC 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 and all actions taken, or programs instituted by the JCC will not violate the Massachusetts Cannabis Control Commission's (CCC) regulations with respect to limitations on ownership or control or other applicable state laws.

Energy Compliance Policy

Introduction: In efforts to comply with the regulations stated within the Massachusetts Cannabis Control Commission (CCC) 935 CMR 500.120(11), JustinCredible Cultivation (JCC) has developed and implemented its Energy Compliance Policy.

Description: JCC will satisfy the requirements for energy efficiency and equipment standards established by the CCC and use best management practices as determined by the CCC. As a Tier 1 facility we will not exceed 50 watts per square foot. JCC upper management team will provide a certification each year to the CCC for licensure renewal.

Implementation:

JCC will use power during off-peak hours, therein at night, to avoid hot periods of the day. We will also recycle as much water and plant media as possible.

June 29, 2020

To Whom It May Concern:

Re: Justincredible Cultivations Energy Certification Letter

To Whom It May Concern:

I, Lee Consavage, PE, Massachusetts License #43037-E, hereby certify that JustinCredible Cultivation, LLC (JCC) is in compliance with all energy, lighting and HVAC standards set forth in the 935 CMR 500 and Massachusetts's building code. JCC uses the HLPD standard of measurement to prove such compliance.

Regulation: HLPD must not exceed 36 watts per gross square foot, but for Tier 1 and Tier 2 which must not exceed 50 watts per square feet.

- JCC uses racks with each light covering a 4X4X16 section of the racks
- Total grow square footage is: Flower room 2,592 sq. ft², Veg Room 1,040 sq. ft², Propagation 144 sq. ft², total combined canopy of 3,776 sq. ft²

JCC is a licensed Tier 1 facility, which allow up to 50 watts per sq. ft² of canopy.

- JCC total canopy equals 3,776 sq. ft² multiplied by the allowed wattage per square foot (50 watts per square foot) gives JCC a total of 188,800 watts allowed.

Using the formula $HLE/HLSF=HLPD$

- Flower room 162 grow lights at 600 watts per light equals 97,200 watts
- Veg Room 65 grow lights at 300 watts per light equals 19,500 watts
- Propagation room 9 grow lights at 300 watts per light equals 2,700 watts.

HLE equals 119,400 total wattage

HLSF equals 3,776 sq. ft²

$119,400/3776=31.62$ HLPD

To summarize, JCC only utilizes 31.62 of its available 50 HLPD.

HVAC & Ventilation System

JCC has planned ahead in multiple ways to ensure an energy efficient HVAC and Ventilation system.

Energy saving methods:

- Location; JCC's grow facility is strategically located in Cummington, MA., where, according to the Almanac of Historical Information at the MyForecast.co website (<http://myforecast.co/bin/climate.m?city=570434&metric=false>), the Average Low Temperature is 16 °F in January and the Average High Temperature is 83 °F in July.
- Insulation; using 3x the required insulation, placing insulation between walls and using metal sheathing allow the building to minimize energy loss.
- Indoor Environment: The energy efficient design of the building, the use of supplemental Co2 and using odor control methods provides for a healthy indoor environment for the plants.

HVAC system components installed in the JCC facility:

1. Samsung
Model Name: AQX36VFUAGM
BTU: 34,000
SEER/EER: 18.00/11.00
COP: 3.11
HSPF: 9.00
2. Samsung
Model Name AR18KSFPDWQX
BTU: 18,000
SEER/EER: 17.00/11.46
COP: 3.44
HSPF: 9.00
3. Samsung
Model Name AR18KSFPDWQX
BTU: 18,000
SEER/EER: 17.00/11.46
COP: 3.44
HSPF: 9.00
4. Samsung
Model Name AR18KSFPDWQX
BTU: 18,000
SEER/EER: 17.00/11.46
COP: 3.44
HSPF: 9.00

5. Samsung
Model Name: AQX36VFUAGM
BTU: 34,000
SEER/EER: 18.00/11.00
COP: 3.11
HSPF: 9.00

6. Samsung
Model Name: AQX36VFUAGM
BTU: 34,000
SEER/EER: 18.00/11.00
COP: 3.11
HSPF: 9.00

Ventilation System

JCC uses air scrubbers to clean and recycle the air inside the facility. The air scrubbers use 3 filters, 2 to clean the air and the final filter is a carbon filter to eliminate odors.

Flower room:

- Amaircare AirWash MultiPRO HEPA Portable Air Scrubber X 2
Airflow: 250 to 800 CFM (variable)
Power: 115 vac/1 ph./60 Hz 2.6 amps
Inlet/Outlet: 12 inch dia. collars
Warranty: 1 year (excluding filters)

Veg Room

- Amaircare AirWash MultiPRO HEPA Portable Air Scrubber X 1
Airflow: 250 to 800 CFM (variable)
Power: 115 vac/1 ph./60 Hz 2.6 amps
Inlet/Outlet: 12 inch dia. collars
Warranty: 1 year (excluding filters)

Propagation Room

- Amaircare AirWash MultiPRO HEPA Portable Air Scrubber X 1
Airflow: 250 to 800 CFM (variable)
Power: 115 vac/1 ph./60 Hz 2.6 amps
Inlet/Outlet: 12 inch dia. collars
Warranty: 1 year (excluding filters)

Dehumidification Units

JCC has 5 dehumidifiers placed throughout the building that can be moved as needed, along with the dehumidifiers JCC will be using Humidity Rocks. These rocks absorb the water in the air and dry themselves out. Helping control the humidity without using any energy or man power.

- MMERCIAL GRADE DEHUMIDIFIER Model 246690 200 Pints/day x 5

Sincerely,



Lee Consavage, PE



Background Check Policy

Introduction: In accordance with the requirements specified in the Massachusetts Cannabis Control Commission (CCC) regulation 935 CMR 500.802(1) - *Suitability Standard for Registration as a Marijuana Establishment Agent*, JustinCredible Cultivation (JCC) has developed a policy that outlines its process for internal background checks.

Description: JCC will satisfy the requirements for agent background checks established by the CCC and use best management practices as determined by the CCC. JCC upper management will run employee background checks upon hire and within annual correspondence with licensure renewal.

Requirement:

To determine suitability, JCC Upper Management will abide in the requirements specified below:

- All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of Other Jurisdictions.
- All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy and solicitation.
- Juvenile dispositions shall not be considered as a factor for determining suitability. (d) Where applicable, all look back periods for criminal conditions, offenses, and violations
- Unless otherwise specified, offenses or violations shall include both convictions, which include guilty pleas and pleas of nolo contendere, and dispositions resulting in continuances without a finding or other disposition constituting an admission to sufficient facts, but shall exclude other non-conviction dispositions.

JCC Upper Management will also consider the following:

- Whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802 renders the subject unsuitable for registration regardless of the determination of the Licensee; and
- Appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application.

NOTE: Registered Agents shall remain suitable at all times a License or registration remains in effect. An individual subject to 935 CMR 500.802, shall notify the Commission in writing of any charge or conviction of an offense that would result in a presumptive negative suitability determination or mandatory disqualification under 935 CMR 500.802: