Massachusetts Cannabis Control Commission

Marijuana Cultivator

General Information:

License Number: MC282524

Original Issued Date: 07/27/2020

Issued Date: 06/17/2021

Expiration Date: 07/27/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Ten-Ten LLC

Phone Number: 518-857-9000 **Email Address:** scot@terracehomebuilders.com

Business Address 1: 775 N. Main St **Business Address 2:**

Business City: Sheffield **Business State:** MA **Business Zip Code:** 01257

Mailing Address 1: 54 Nelson Ave Ext **Mailing Address 2:**

Mailing City: Saratoga Springs **Mailing State:** NY **Mailing Zip Code:** 12866

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100 **Percentage Of Control:** 100

Role: Owner / Partner **Other Role:**

First Name: Scot **Last Name:** Trifilo **Suffix:**

Gender: Male **User Defined Gender:**

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY
No records found

CLOSE ASSOCIATES AND MEMBERS
No records found

CAPITAL RESOURCES - INDIVIDUALS
Individual Contributing Capital 1

First Name: Scot **Last Name:** Trifilo **Suffix:**

Types of Capital: Monetary/Equity, Land, Buildings **Other Type of Capital:** **Total Value of the Capital Provided:** $1465000 **Percentage of Initial Capital:** 100

Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES
No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES
No records found

DISCLOSURE OF INDIVIDUAL INTERESTS
No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 775 N. Main St

Establishment Address 2:

Establishment City: Sheffield **Establishment Zip Code:** 01257

Approximate square footage of the Establishment: 6000 **How many abutters does this property have?:** 10

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

Cultivation Tier: Tier 03: 10,001 to 20,000 sq. ft **Cultivation Environment:** Outdoor

FEE QUESTIONS

Cultivation Tier: Tier 03: 10,001 to 20,000 sq. ft **Cultivation Environment:** Indoor

HOST COMMUNITY INFORMATION
Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Host community agreement certification form.pdf	pdf	5deaed2226aa77532085ee47	12/06/2019
Community Outreach Meeting Documentation	Attachment A - 7 day newspaper notice for abutters.pdf	pdf	5e4d634afe55e40432f719b6	02/19/2020
Community Outreach Meeting Documentation	Attachment A - 14 day newspaper notice for 12-19-19 meeting.pdf	pdf	5e4d63577225f0046965a124	02/19/2020
Community Outreach Meeting Documentation	Attachment B - Copy of the meeting notice filed with the town clerk for 12-3-19 meeting.pdf	pdf	5e4d636481ae16046beca267	02/19/2020

Community Outreach Meeting Documentation	Attachment B - Copy of the meeting notice filed with the town clerk for 12-19-19 meeting.pdf	pdf	5e4d638c1c3b1d04a32b3805	02/19/2020
Community Outreach Meeting Documentation	Attachment C Municipal Notice sent to abutters Nov 23 2019.pdf	pdf	5e4d639f813339048c3fdd47	02/19/2020
Community Outreach Meeting Documentation	Community Outreach Meeting Attestation Form (for 2 seperate meetings).pdf	pdf	5e4d63b67225f0046965a134	02/19/2020
Plan to Remain Compliant with Local Zoning	RFI Plan to Remain Compliant with Local Zoning 3-20-20.pdf	pdf	5e7a6592b3c49635509e869d	03/24/2020

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	TEN-TEN Positive Impact Plan RFI 03 16 2020 kjb.pdf	pdf	5e78ca1481ed8a355b8d5e0e	03/23/2020

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role:

Other Role:

First Name: Scot

Last Name: Trifilo

Suffix:

RMD Association: Not associated with an RMD

Background Question: yes

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Articles of Organization Ten-Ten.pdf	pdf	5de84fd1b4f83557d6cc9c92	12/04/2019
Bylaws	Ten-Ten bylaws resized.pdf	pdf	5de8545a8bdcfd57ae528d3d	12/04/2019
Department of Revenue - Certificate of Good standing	Department of Revenue Good Standing (dated 3-23-20) Ten-Ten LLC.pdf	pdf	5e78d1acd29ad9357159410f	03/23/2020
Department of Revenue - Certificate of Good standing	RFI Department of Unemployment Assistance - Attestation 3-18-20.pdf	pdf	5e7a63e0482e703583b790d2	03/24/2020
Secretary of Commonwealth - Certificate of Good Standing	Secretary of Commonwealth Letter of Good Standing 11-21-19.pdf	pdf	5e9848b62eba6d38ef167925	04/16/2020

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date

Department of Unemployment Assistance - Certificate of Good standing	RENEWAL 7-27-21 Department of Unemployment Assistance - Attestation.pdf	pdf	60a2af8b6f8420077bfc9cba	05/17/2021
Department of Revenue - Certificate of Good standing	RENEWAL 7-27-21 Department of Revenue Letter of Good Standing (May 7 2021) Ten-Ten LLC.pdf	pdf	60a7d1a35584fe07c3fa4b94	05/21/2021
Secretary of Commonwealth - Certificate of Good Standing	RENEWAL 7-27-21 Secretary of Commonwealth Letter of Good Standing (May 11 2021).pdf	pdf	60a7d1cf5584fe07c3fa4b98	05/21/2021

Massachusetts Business Identification Number: 001347065

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	12-1-19 Ten-Ten Plan for Obtaining Liability Insurance.pdf	pdf	5deaef1f66a32657cfbde806	12/06/2019
Business Plan	TEN-TEN Business Plan 02 18 2020.pdf	pdf	5e4d64421c3b1d04a32b380e	02/19/2020
Proposed Timeline	Proposed Timeline RFI 03 13 2020 kjb.pdf	pdf	5e78d2d39a385038d9d87e3b	03/23/2020
Proposed Timeline	UPDATED FOR RENEWAL 7-27-21 Proposed Timeline .pdf	pdf	60a2b4166f8420077bfc9cd7	05/17/2021
Business Plan	RENEWAL 7-27-21 Business Plan.pdf	pdf	60a2b443247e180786c98516	05/17/2021
Plan for Liability Insurance	RENEWAL 7-27-21 - Plan for Obtaining General Liability Insurance.pdf	pdf	60a2b472031c12076ccf5397	05/17/2021

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Policies and Procedures for cultivating.	18. Policies and Procedures for Cultivation 02 17 2020.pdf	pdf	5e4d647ed29b0704447d89ab	02/19/2020
Separating recreational from medical operations, if applicable	2. Seperating recreational from medical operations 02 17 2020.pdf	pdf	5e4d648c813339048c3fdd52	02/19/2020
Prevention of diversion	5. Plan for Prevention of Diversion 02 17 2020.pdf	pdf	5e4d64c81c3b1d04a32b3812	02/19/2020
Storage of marijuana	6. Storage and Waste Disposal 02 17 2020.pdf	pdf	5e4d64d1fe55e40432f719cc	02/19/2020
Transportation of marijuana	7. Shipping, Receiving and Transportation Plan 02 17 2020.pdf	pdf	5e4d64e0813339048c3fdd5a	02/19/2020
Inventory procedures	8. Inventory Procedures 02 17 2020.pdf	pdf	5e4d64e8d29b0704447d89b3	02/19/2020
Quality control and testing	9. Quality Control Processes, Product Safety Plans, and Testing Procedures 02 17	pdf	5e4d64ef4dd5bb049410798d	02/19/2020

	2020.pdf			
Record Keeping procedures	12. Recordkeeping Procedures 02 17 2020.pdf	pdf	5e4d65074dd5bb0494107991	02/19/2020
Maintaining of financial records	13. Maintenance of Financial Records 02 17 2020.pdf	pdf	5e4d650f64339304b0900734	02/19/2020
Qualifications and training	15. Qualifications and Intended Trainings 02 17 2020 .pdf	pdf	5e4d651f64339304b0900738	02/19/2020
Security plan	Safety and Security Plan RFI 03 17 2020 kjb1.pdf	pdf	5e78e044bddf0438d21d9bec	03/23/2020
Personnel policies including background checks	Personnel Policies and Procedures REVISED RFI 03 24 2020 2 kjb.pdf	pdf	5e7a5f3d9a385038d9d8840f	03/24/2020
Restricting Access to age 21 and older	INDOOR Plan to Restrict Access to Age 21 RFI 2.pdf	pdf	5e9741ba482e703583b7d804	04/15/2020
Diversity plan	Diversity Plan REVISED 04 16 2020 .pdf	pdf	5e98ab44172cbc3545978303	04/16/2020
Policies and Procedures for cultivating.	RENEWAL 7-27-21 Policies and Procedures for Cultivation .pdf	pdf	60a2b87185675207abc7c847	05/17/2021
Separating recreational from medical operations, if applicable	RENEWAL 7-27-21 Seperating recreational from medical operations .pdf	pdf	60a2b8b168436d078d6b5341	05/17/2021
Restricting Access to age 21 and older	RENEWAL 7-27-21 Indoor Plan to Restrict Access to Age 21 .pdf	pdf	60a2cb8ed91389075ed3bf55	05/17/2021
Security plan	RENEWAL 7-27-21 Safety and Security Plan.pdf	pdf	60a2cd638ecb05074fe6cbd2	05/17/2021
Prevention of diversion	RENEWAL 7-27-21 Plan for Prevention of Diversion .pdf	pdf	60a2dc243bbe600765b4fc36	05/17/2021
Storage of marijuana	RENEWAL 7-27-21 Storage and Waste Disposal .pdf	pdf	60a2dc7a8f80610756a14e93	05/17/2021
Transportation of marijuana	RENEWAL 7-27-21 Shipping, Receiving and Transportation Plan .pdf	pdf	60a2dcd36f8420077bfc9e36	05/17/2021
Inventory procedures	RENEWAL 7-27-21 Inventory Procedures.pdf	pdf	60a2dd1f8ecb05074fe6cc5c	05/17/2021
Quality control and testing	RENEW 7-27-21 Qual Cont Processe, Product Safety, and Testing.pdf	pdf	60a2deb2e54b280786bb33ad	05/17/2021
Personnel policies including background checks	RENEWAL 7-27-21 Personnel Policies and Procedures.pdf	pdf	60a2e3bd3bbe600765b4fc60	05/17/2021
Record Keeping procedures	RENEWAL 7-27-21 Recordkeeping Procedure.pdf	pdf	60a2e3f48f80610756a14eb9	05/17/2021
Maintaining of financial records	RENEWAL 7-27-21 Maintenance of Financial Records .pdf	pdf	60a2e412247e180786c986aa	05/17/2021
Diversity plan	RENEWAL 07 21 2021 Status on Diversity Plan .pdf	pdf	60a2e43209011007a03d39ce	05/17/2021
Qualifications and training	RENEWAL 7-27-21 Qualifications and Intended Trainings .pdf	pdf	60a2e45768436d078d6b54b7	05/17/2021
Energy Compliance Plan	RENEWAL 07-27-21 Status on Energy Audit.pdf	pdf	60a3f83c031c12076ccf5878	05/18/2021
Dispensing procedures	RENEWAL 7-27-21 Cultivation Plan to Distribute Transfer to ME.pdf	pdf	60ad4a935584fe07c3fa5854	05/25/2021

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

Notifcation: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success:

PROGRESS TOWARD SUCCESS

TEN-TEN has not held the education and expungement sessions.

TEN-TEN is renewing its Provisional Licensure. While TEN-TEN intended to begin progress on their Goals, even before final licensure, COVID-19 has hampered TEN-TEN's ability to perform education and training sessions.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success:

Progress on Diversity Plan

TEN-TEN has engaged one service provider that is a certified woman owned business.

TEN-TEN, LLC (hereinafter "TEN-TEN") does not currently have any employees.

TEN-TEN's management upon initial request for licensure was the single owner, who is a white male. Upon this renewal of TEN-TEN's Provisional License no other entity or person has obtained ownership or control.

HOURS OF OPERATION

Monday From: 8:00 AM	Monday To: 8:00 PM
Tuesday From: 8:00 AM	Tuesday To: 8:00 PM

Wednesday From: 8:00 AM	**Wednesday To:** 8:00 PM
Thursday From: 8:00 AM	**Thursday To:** 8:00 PM
Friday From: 8:00 AM	**Friday To:** 8:00 PM
Saturday From: 8:00 AM	**Saturday To:** 8:00 PM
Sunday From: 8:00 AM	**Sunday To:** 8:00 PM

Cannabis Control Commission

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, SCOT TRIFILO, (*insert name*) certify as an authorized representative of TEN-TEN CRAFT CANNABIS (*insert name of applicant*) that the applicant has executed a host community agreement with SHEFFIELD, MA (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on SEPT 4, 2018 (*insert date*).

Signature of Authorized Representative of Applicant

Host Community

I, DAVID A SMITH JR, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for SHEFFIELD, MA (*insert name of host community*) to certify that the applicant and SHEFFIELD, MA (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on SEPT 4, 2018 (*insert date*).

Signature of Contracting Authority or
Authorized Representative of Host Community

ATTACHMEN A
7-DAY
NOTICE
FOR ABUTTERS

Public Notices

Public Notice

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **December 3, 2019 at 5:30pm at the Sheffield Town Hall at 21 Depot Square, Sheffield, MA.** The proposed cultivation, manufacture and retail facility is anticipated to be located at 775 N. Main Street, Sheffield, MA. There will be an opportunity for the public to ask questions.
11/25/19

REQUEST FOR QUALIFICATIONS

OWNER'S PROJECT MANAGER SERVICES for PHASE I MULTIPURPOSE BUILDING

MOUNT GREYLOCK REGIONAL SCHOOL DISTRICT WILLIAMSTOWN MASSACHUSETTS 01267

The Mount Greylock Regional School District Superintendent of Schools, or their designee, will receive sealed bids for **THE PHASE I OWNER'S PROJECT MANAGER SERVICES for MULTIPURPOSE BUILDING.**

Request for qualifications will be available at the Superintendent's Office, 1781 Cold Spring Road, Williamstown MA 01267 and online at www.mgrsd.org at 10am on November 22, 2019. The request for qualifications will be available for two weeks.

Each proposal will be sealed and clearly marked **PHASE I OWNER'S PROJECT MANAGER SERVICES for MULTIPURPOSE BUILDING**, must be submitted by 2:00 PM EST on **12/11/19** and addressed to the

Mount Greylock Regional School District
c/o Superintendent of Schools
1781 Cold Spring Road
Williamstown, MA 01267

and received not later than 2:00 PM EST on Wednesday, **DECEMBER 11, 2019** at which time and place all bids will be publicly opened and read aloud.

The Superintendent of Schools and/or MGRSD School Committee reserves the right to reject any and all PHASE I OWNER'S PROJECT MANAGER SERVICES for MULTIPURPOSE BUILDING proposals in whole or in part and to waive informalities to best serve the interests of the Mount Greylock Regional School District.

Kim Grady
Superintendent of Schools
11/23/19-11/27/19

Business Rentals

PITTSFIELD. Elm Street. 1,200 sf retail space in busy shopping center. Prime location. **845-686-8800**

Apartment Rentals

1 BDR in Pittsfield. For more info. call 413-442-7686 and ask for Emilia

1 BDRM. $475/month
2 BDRM. $775/month.
Appliances, no utilities.
No pets. **413-442-8734**

Apartment Rentals

ALL RENTALS
on-line at:
www.rhfuller.com
by the
Rental Housing Association
of
Berkshire County

NORTH ADAMS: FRANKLIN COURT
1 & 2 bedroom apartments in modern brick buildings. Large living room, eat in kitchen. Each apartment has its own dedicated garage. Laundry, playground, pool, large gazebo. From $895 to $1,950 includes heat, hot water. Net-work.
(413) 281-3888

Furnished Apartments

PITTSFIELD. Furnished, BR set and rooms for rent. Prices vary weekly & monthly. Everything included. 413-841-2644

Help Wanted

CARRIERS NEEDED:

SPRINGSIDE/CRANE AVE. AREAS (Pittsfield)
173 PAPERS DAILY
288 SUNDAY
2.5-3 HRS. A DAY
$600 BI-WEEKLY

WALDEN LN. UPPER NORTH ST AREA (Pittsfield)
79 PAPERS DAILY
86 SUNDAY
2 HRS. A DAY
$400 BI-WEEKLY

Contact Eric 413-496-6343

FIRE & SECURITY ALARM TECHNICIAN WANTED:

Lee Audio 'N Security Inc. has immediate openings for Alarm Technicians or Electricians to program, install, and service our Notifier Fire Alarm, Honeywell Security, Access Control, and CCTV Systems. We currently have openings in our Lee, MA office as well as our Clifton Park, NY office. Applicants for the Massachusetts office must possess either a Class B or Class D Electricians License. Applicants for the New York office should have experience in the field but no License is required.

For more information please visit our website at www.leeaudionwic.utility.net. Please submit resumes or requests to: D. Justin Mooney, Business Manager, Lee Audio 'N Security, Inc. Tel: 800-369-3905, FAX: 413-243-1273. Email: djmooney@leeaudio.net

$100 and Under

2 HOLMES AIR PURIFIERS. Paid $70, sell both for $30. For 12' x 14' room. 413-447-7931

ANTIQUE FOGHORN. 6V - 12 V $25. 413-443-8661

ANTIQUE UPRIGHT PIANO. Cable Company. FREE. 413-441-5437

ARCHERY EQUIPMENT. 2 Martin bows, arrows, broadheads and more. $100 for all. 413-442-4682

BLACK TUXEDO. Size 42 regular. Shirt, tie & cummerbund included. $50. (413)442-9583.

$100 and Under

BLADE SHARPENER. Commercial class for deer mower blades. FREE 413-443-7944

BOOKS. James Patterson, Stephen King, Arts & Crafts, Cooking, etc. $1. 413-743-2451

CABBAGE SLICER. Antique wooden. $40. 413-443-8661

CHRISTMAS RUG. Santa scene. 3' wide x 5' long. Excellent condition. $25. 413-344-9598

CHRISTMAS TREE. (11). Pinefield. Nice shape. You cut down. $65. 413-344-9598

CHRISTMAS TREE. 4 ft. Tree, made in Sweden. Strong with 4 sets of LED lights, last all year. $50. 413-442-4213

CHRISTMAS TREE. 6.5 ft. Mid season lights with stand. $30. 413-442-9298

CHRISTMAS TREE. Pre-lit 7 ft. Top of accessories, 1 year old. $60. 413-464-4935

CIVIL WAR era prints/documents. Military, US State Dept. White House, NY Mayoral, etc. $100. Infodphotos, 347-818-1583

CLOSET. Beautiful off white two doors with mirrors. 78x24x38. Great value. $40. 413-743-7342

COFFEE TABLE. Glass top. $20. 413-442-4478

COMPOUND MITER SAW with stand. 10". Chicago Electric. $100. 518-589-7984

CRAFTSMAN SAW. Overarm Saw. 10 hp. $60. 413-464-1922

DEMI COMMODE OVEN. Very good cond. SOLD 413-443-2315

DRESSER. 6 drawer, 3 per side, modern style. $25. For infodphotos, contact 347-818-1583

DURAFLAME HEATER. $60. 413-465-2478

ELECTRIC HOT PLATE. Broiler range combo, warmer. Never used. $35. 413-344-4945.

ELLIPTICAL MACHINE. Fitness Gear 6210, electric programmable. $100 OBO. 413-442-8982

FISHING VEST. Mesh. Brand new. Multiple pockets. $35. 413-822-8278

FLOOR MATS. Full set for Honda CRV. $100. 413-442-8606

FLOOR MATS for a Chevy extended cab pickup, front and back, tan. Like new. $35 OBO. 413-442-4682

FLY ROD Shenipsent Contender 8' 6-7 weight. $25 OBO. 413-442-4682

FOTOCONNECT, WIFI. By Photar Photos. Weather, email. $85. 413-822-8278

FREE FIREWOOD. Maple. Bring chainsaw. 413-637-9534

FREE GAMES. Card Land, Chutes & Ladders, Blokus, Puzzles, etc. 413-442-6412

GERMAN NUTCRACKERS. Vintage, wooden, classic soldiers & novelty. $5-$30 each avail. 267-369-8423

GIANT BICYCLES (3). Adults. $80 ea. 413-499-2476

HIKING BOOTS. Boy's, Hitech, waterproof. Size 2.5. Like new. $15. 413-663-4684

ICE HARVESTING SAWS. Approx. 4 ft long. $80 ea. 413-443-8661

JUMPEROO. Fisher Price Collapsee, baby to 9 months. $30. 413-464-1522

KIDS BICYCLES (3). $40 ea. 413-499-2476

LUCK IS only part of it. A classified ad is the rest!

$100 and Under

LAMINATE FLOORING. American Oak. 11 boxes, 32.86 sq.ft per box. Brand new never opened. $60 for all. 413-684-4718

LANE FURNITURE. Solid pine coffee table & 2 end tables. In good shape. $35 ea. Can email pics. 413-442-7748

LEATHER COAT. Mens, 3/4 length, 2XL. Zip opening. $75. 413-448-8677

LOUVERED DOORS. Single Sliding, Brand new, 96" tall in box. $60. 413-442-8981

MERRELL BOOTS. Boy's, waterproof, hiking boots. Size 6. Exc. Cond. $15. 413-663-4684

MUSICAL MR. GRINCH. $50. 413-442-4622

MUSIC STAND. Adjustable, solid oak. $50. 413-442-7298

PATIO TABLE. Black wrought iron by Woodard. 42x72 oval. Never used. $25. 413-684-4718

RECLINER CHAIR. New condition. Color ranch beige. $80. 413-442-8728

SANYO TV 36" Flat Screen, color with remote. $80. 413-822-8278

SHELVING UNIT. Metal. 4 shelves. 41"H 36"W 18"D. Good condition. $25. 413-446-5782

SNOWBLOWER. Dual stage. Snow Chief. Ship. 24". $1100. 413-243-3381

SNOW TIRES (2). Yokohama 225/60R17. $80. 413-464-4956

SNOW TIRES. (4). Cooper 225/50R17. On rims. $100. 413-822-8673

SNOW TIRES. (x4). Nokian Hakkapeliitta. 205/60R15, excellent condition. $100. 413-217-0887 Lee/Pittsfield

SNOW TIRES. Goodyear. 82R 86-80R14. 82T winter rims. $85. 413-445-4242

SNOW TIRES. Studded Cooper Discoverer. 245/75R16. $100. 413-623-5642 leave message

SNOW TIRES 2 Altimax Arctic 235/45R17 1 season. $95 pair. 413-329-2785

STAMP COLLECTION. First-day covers 1980. Olympics. $60. 413-779-1668

STUDDED SNOW TIRES. 245-65-17. Winter Claw, used 2 seasons. $100 for all four. 413-347-3748

TIRES. (x4). Dunlop Signature II. 5000 miles. 215/60R16. $100. 413-212-0807 (cell/text)

$100 and Under

TRAMPOLINE. Great fun! Jump with your children and pets. 12' diameter, original price $1400, asking $400. Pittsfield/Lenox area. 413-329-2785

TRESTLE TABLE. Solid pine. Made in BC. 87"L 41"x 42-44"H. $100. 413-442-4478

V-TECH 2-in-1 Rocker washer, multi cat, extend to 3 years. $20. 413-464-1922

WET/DRY VACUUM. Stainless steel, Ridgid. Model WD1680P. New. $30. 413-243-3314

WHIRLPOOL DRYER. Good cond. $100. 413-442-4478 SOLD

WHIRLPOOL WASHER. Good cond. $120. 413-442-4478 SOLD

WHITE MOUNTAIN WAVE Washer/dryer combo. Never used. W 27" x D 27" x H 32". $1000. 413-443-6275 SOLD

WICKER FURNITURE. Desk & dresser. $80. 413-499-2476.

WOODEN ROCKER. $40. 413-499-2476

WOOD FIREPLACE. $45. 413-499-2476

WOOD SHELVES: Metal shelves and display units for sale. Wooden: 36, $2; 48" $3; Metal: 36 $4, 48" $6. Uprights $3. Call Jim's House of Stone 413-445-4085

YAMAHA SPEAKERS. Bookshelf Model NS-A638, 80 Watts. Exc. cond. Retailer 413-663-4684

Articles for Sale

DIAMOND RING: 3/4 carat, 14 carat gold. Diamond solitaire. Papers included. $1500 or best offer. Two glass lighted green candelabras. $200 or best offer. 413-684-8787

DROP-IN TUB. Ram-Ultra of Quebec, Canada, top of the line, premium drop-in tub. Perfect condition. $675. Hydro-therma massage model with heat seat, molded armrests, grab bars, motor, Moen hardware with shower head attachment and all connections (model 45772, 60" x 32"w. Equivalent model currently retails for $4,000 to $5,000. 802-430-7733

SNOW PLOW. Fisher Model 654028. 7 ft., heavy duty. Electro/hydraulic. Good condition. $675 OBO. 413-822-1582

IT'S THE CONVENIENCE that makes people coming back to the great deals found in the classifieds.

Gas, Coal, Oil, Wood

FIREWOOD
Cut, split & delivered. $175 cord & 1/2 cord. 413-672-0771

LOG LENGTH FIREWOOD FOR SALE
8' cords delivered.
Pine $275, Oak $325.
$100.00 delivery charge.
Pricing subject to change.
Free stack purchase.
Standing timber.
Please call 1-413-245-9615

Merchandise Wanted

WANTED: 120 feet of chain link fence or similar. 413-442-6358

Automobiles Used

1977 BUICK LACROSSE CX. Good cond. Nice options. 77K miles. $2,500.

1992 TOYOTA ECHO. 98K miles, looks good, inspected. $1,400. Call 413-499-6399

SUBARU OUTBACK WAGON 2005. 6 cyl., 2.5L, AT, premium sound, roof rack, heated seats, loaded, very good condition. 113,000 miles. $5,500. 413-664-5207

TOYOTA CAMRY LE 2001 sedan, 4 door automatic. 180K miles, runs good. $2500. 413-499-9754

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CROSSWORD PUZZLES

Los Angeles Times Daily Crossword Puzzle

Edited by Rich Norris and Joyce Nichols Lewis

ACROSS
1 Pole on the Pequod
5 Conclude from evidence
10 Auto loan figs.
14 Smoothie berry
15 Land, in France
16 Talk over tea
17 "Soccer ref's formal warning
19 Like wet mud pies
20 Bulring bravo
21 Like dried-out mud pies
22 Cerebral __: brain layer
24 Name of many pharaohs
26 Singer Mars
27 "Letter box access
30 Emeril catchword
33 Like XLII, numeral-wise
36 Elevator innovator
37 Classic theater name
38 Eurasian border range
39 Fiber sources
40 Four-leaf clover, to some
41 Astronaut Armstrong
42 Apartment payment
43 "In Xanadu did __ Khan ...": Coleridge
44 Weigh station unit
45 "Area where cellphones don't work
47 Weighty exam
49 Montblanc topper
53 Prohibited
55 Biblical "you"
57 Rose of rock music
58 "Sorry to say ..."
59 Later than expected ... and where the ends of the answers to starred clues may be found
62 Opposite of went
63 Bay window
64 Many an Omani
65 Like two, not one
66 Simultaneous equation variables
67 No longer here

DOWN
1 Big city big shot
2 Amtrak express train
3 Witch trial town
4 Shop __ you drop
5 Formal words of confession
6 Hickey spot
7 Start to unravel
8 Sip up
9 Disaster relief organization
10 Seed that grows squirrels?
11 *Sneak into the shot
12 Level with a wrecking ball
13 River of Hades
18 Neptune's realm
23 Part of KO
25 Petite
26 Cheesy pancake, perhaps
28 Cosmetics giant
29 Lamp support
31 Ice skating feat
32 Mimicking bird
33 Littlest of the litter
34 Snack sometimes eaten from the inside out
35 *iPad's giant ancestor
37 City where Joan of Arc died
39 Loaf holder
43 Weak- or knock-follower
45 Crime scene sample
46 In full view
48 "Peer Gynt" dramatist
50 Egypt's capital
51 Guy felling trees
52 Annapolis frosh
53 Clock front
54 Norse king of Geats
55 Girl Scouts' __ Mints
56 Hurried, old-style
60 Historical period
61 Kids' game with a safe area

ANSWER TO PREVIOUS PUZZLE:

C	O	W	B	O	Y	U	P	■	S	T	A	N	G	S
O	K	A	Y	S	U	R	E	■	T	W	O	O	U	T
L	E	G	A	L	P	A	D	■	N	A	R	N	I	A
L	E	G	G	O	■	N	A	M	■	S	T	U	D	Y
A	F	E	E	■	A	I	L	E	D	■	A	N	E	W
R	E	D	■	P	R	U	S	S	I	A	■	I	D	O
■	■	■	T	R	I	M	■	O	F	F	B	O	O	K
T	H	E	W	I	Z	■	■	■	F	L	A	N	G	E
R	A	N	A	M	O	K	■	V	E	A	L	■	■	■
I	V	E	■	O	N	A	L	E	R	T	■	H	I	P
G	E	R	M	■	A	M	I	S	S	■	B	A	N	O
R	A	G	A	S	■	A	L	T	■	B	A	N	D	S
A	N	I	M	U	S	■	K	I	L	L	I	N	I	T
M	A	Z	I	E	R	■	I	G	O	T	T	A	G	O
S	P	E	E	D	O	■	M	E	N	S	S	H	O	P

11/25/19

ACROSS
1 Had down pat
5 California's Big —
8 Bumpkin
12 Pelt
13 Still exist
14 Poet's black
15 Quit flying
16 Ms. Merkel
17 Puerto —
18 Caught, as a fish
20 Boston team (2 wds.)
22 Actor — Wallach
23 Two-finger sign
24 Quartets
27 Not as hot
30 Bungle
31 Negative responses
32 Run around
34 Married
35 Pet plea
36 Livy's eggs
37 Wall socket
39 Gave medicine
41 Ancient
42 Hack's vehicle
43 Cask
46 Purplish flowers
50 — St. Laurent
51 Psyche components
53 Siberian river
54 Oz pooch
55 Acorn
56 Your Majesty
57 Pasture grazers
58 Right, to Dobbin
59 Used thriftily

DOWN
1 Mongol ruler
2 Cleopatra's river
3 Prevent errata
4 More soggy
5 Riyadh resident
6 Tail vase
7 Type of mirror
8 Rounded up
9 Heron cousin
10 First name in perfume
11 Kentucky fort
19 Loop trains
21 Long fish
24 Smattering
25 Black-and-white snack
26 Language of Pakistan
27 Debatable
28 Swelled heads
29 Stellar review
31 Teasing
33 Pater
35 Marseilles Ms.
38 Museum sculptures
39 Berlin article
40 Dull
42 Social class
43 Data storage unit
44 Disclose
45 Nerve network
47 Kramer or Estrada
48 Hard to get
49 Yukon hauler
52 Rightful

Answer to Previous Puzzle

A	E	G	I	S	■	■	■	A	E	R	I	E
F	R	A	N	C	■	■	■	L	E	A	R	N
R	E	D	C	A	P	■	S	T	O	C	K	Y
■	■	■	E	N	R	I	C	O	■	E	S	A
■	A	N	N	■	O	R	O	■	■	■	■	■
O	L	E	S	■	D	R	U	B	■	X	I	V
T	O	W	E	R	■	I	R	A	■	E	C	O
I	F	S	■	I	S	T	■	H	A	N	O	I
S	T	Y	■	A	H	A	B	■	B	O	N	D
■	■	■	■	■	R	T	E	■	I	N	S	■
Y	O	M	■	F	U	E	L	E	D	■	■	■
E	P	I	L	O	G	■	A	R	I	S	E	S
T	U	L	I	P	■	■	G	N	A	W	S	■
I	S	L	E	S	■	■	O	G	D	E	N	■

11-25

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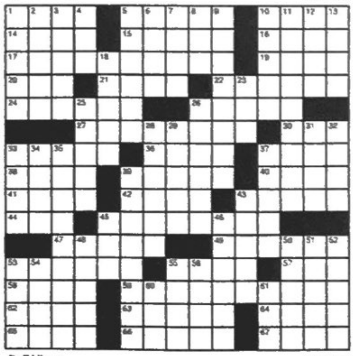

By Ed Sessa

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11/25/19

Public Notice

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **December 3, 2019 at 5:30pm at the Sheffield Town Hall at 21 Depot Square, Sheffield, MA.** The proposed cultivation, manufacture and retail facility is anticipated to be located at 775 N. Main Street, Sheffield, MA. There will be an opportunity for the public to ask questions.

11/25/19

ATTACHMENT A
14-DAY NOTICE
FOR NEWSPAPER PUBLIC NOTICE

Hall

FROM PAGE 1

This year's selections were made by a 21-person committee headed by longtime sportswriter and current Red Sox team historian Gordon Edes. The committee is comprised of club executives, local and national media members, historians, and fan representatives.

To be eligible for nomination, players must have played at least three years with the Red Sox and must also have been out of uniform as an active player at least three years. The non-uniformed person or persons selected and the memorable moment selected will be chosen only by a unanimous vote of the Boston Red Sox Hall of Fame Selection Committee.

"It's a great honor for Dan," said J.P. Ricciardi, a Worcester resident, who assists Farhan Zaidi, the president of baseball operations with the San Francisco Giants. Ricciardi competed against Duquette with the Oakland A's and then with the Toronto Blue Jays, where he was the general manager from 2011-2015.

"First and foremost, he did a great job with the Red Sox. One of the hardest things to do as a general manager is always leave the job on a high note," he said. "You're ultimately let go at some point. Dan did a great job with the Red Sox. I'm really, really happy to see that they're honoring him. If you go back and look at the foundation of that team that went on to win the first World Championship, a lot of the players were brought in by him.

"He set the tempo and the foundation for what Theo [Epstein] and the rest of them did."

Duquette came to Boston from Montreal to open the 1984 season, he was let go after the 2001 season.

Under Duquette's stewardship, the Red Sox won the AL East title in 1986 and made additional postseason appearances in 1988 and 1990. Those marked the first back-to-back playoff appearances for a Boston team since 1915-16.

PHOTO PROVIDED BY KEN WHITESTONE

Dan Duquette, third from left, was back in the Berkshires recently, being inducted to the Dalton CRA Hall of Fame, along with Matt White, Jeff Reardon, Larry Moore, Jeff Wallace, Turk Wendell and Jim Duquette. Dan Duquette has now added the Boston Red Sox Hall of Fame to his resume as well.

Duquette, reached by The Berkshire Eagle in the Dominican Republic where he is consulting for a client on future players, admitted to being surprised the call came from Edes, a former Boston Globe Red Sox beat writer.

"It was like 'Wow,'" Duquette said. "I was surprised. Gordon Edes called my son Daniel to set it up. When Daniel was visiting, he was going to announce to the whole family that I got into the Hall of Fame. Gordon told the whole family that was around for Thanksgiving. It was a big moment for us."

Duquette was let go by the Red Sox when the John Henry group purchased the team. One year after that, Theo Epstein was installed in Duquette's spot, and continued the rebuilding that led to the World Series title.

Once, when Dan Duquette's cousin Jim was asked about losing the "interim" tag as New York Mets general manager, Jim Duquette said "We're all interim in this business."

And while Dan Duquette's tenure did not last as long as perhaps he had hoped, the former Red Sox GM said he is still happy he had time at Fenway Park.

"My family and everybody in Dalton, of course, are over the moon. They're all proud of the recognition," he said. "It's awesome and humbling to go into the Hall of Fame with Manny and Papi. The clinching game of the '04 World Series, that's pretty neat too."

Two of Duquette's biggest trades set the foundation of that 2004 championship team. On July 31, 1997, he traded closer Heathcliff Slocumb for catcher Jason Varitek and pitcher Derek Lowe. Both had key roles in the 2004 title team. Later in 1997, Duquette sent pitching prospect Carl Pavano and outfield prospect Tony Armas Jr. to Montreal in exchange for Pedro Martinez. Martinez became the Sox pitcher of the decade and was inducted into the Baseball Hall of Fame in 2015.

In addition, Duquette signed free agents Manny Ramirez and Johnny Damon to contracts, and they were also key cogs in the 2004 championship team.

"Manny's one of my favorites. I'm so happy for him," Duquette said. "I've been trying to get in touch with him [in the Dominican] to congratulate him. What a terrific career."

Under Duquette, the Red Sox also drafted Nomar Garciaparra in 1994 and signed Tim Wakefield as a free agent in 1995 after he was released by the Pirates.

Jim Duquette, Dan's cousin, who now works for MLB Radio, said that having Dan go into the Red Sox Hall of Fame is great and the fact that it's a New Englander going in, doubles the excitement.

"To become general manager of your hometown team, I know how much that meant to him," Jim Duquette said, when reached on Tuesday. "I still remember the time period when he was in Montreal, the Red Sox were calling for permission, and there was a little bit of a hold up. It was such a unique opportunity I just remember how big of a deal it was in his mind.

"Now, to finally find out that all those years he was the general manager, you're now going into the Hall of Fame? It doesn't get much better than that."

And not just for Dan Duquette.

"It was gratifying to see the curse lifted and the team win," he said. "That goes not only for my generation of the Duquettes, but it goes to four generations of the Duquettes.

"That was a long suffering for Red Sox fans everywhere."

Classifieds

To place your ad, call 1-800-234-7404

Public Notices

Commonwealth of Massachusetts
The Trial Court
Probate and Family Court

CITATION ON PETITION FOR FORMAL ADJUDICATION
Docket No. BE19P0830EA

Estate of: Sherman Vail Allen, Jr.
Date of Death: 05/15/2019

Berkshire Probate and Family Court
44 Bank Row
Pittsfield, MA 01201
(413) 442-6941

To all interested persons:
A Petition for **Formal Probate of Will with Appointment of Personal Representative** has been filed by **Jennifer C Allen of Rutland VT** requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that **Jennifer C Allen of Rutland VT** be appointed as Personal Representative(s) of said estate to serve **Without Surety** on the bond in **an unsupervised** administration.

IMPORTANT NOTICE
You have the right to obtain a copy of the Petition from the Petitioner or at the Court. You have a right to object to this proceeding. To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m. on the return day of 12/23/2019. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you.

UNSUPERVISED ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE CODE (MUPC)

A Personal Representative appointed under the MUPC in an unsupervised administration is not required to file an inventory or annual accounts with the Court. Persons interested in the estate are entitled to notice regarding the administration directly from the Personal Representative and may petition the Court in any matter relating to the estate, including the distribution of assets and expenses of administration.

WITNESS,
Hon. Richard A Simons,
First Justice of this Court
Date: November 22, 2019
Francis B Marinaro
Register of Probate

12/05/19

Commonwealth of Massachusetts
The Trial Court
Probate and Family Court
Berkshire Probate and Family Court
44 Bank Row
Pittsfield, MA 01201
(413) 442-6941

CITATION ON PETITION FOR ALLOWANCE OF ACCOUNT

Docket No. BE19P0031EA

In the matter of:
Jean R Duncan Trust
Date of Death: 12/16/2018

To all interested persons:

A Petition has been filed by
Leslie H Paisley
of Williamstown, MA
Henry R Denton of Westfield, MA

requesting allowance of the First and Final account(s) as Trustee and other relief as requested in the Petition.

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. You have a right to object to this proceeding. To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m. on 12/16/2019. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you.

WITNESS,
Hon. Richard A Simons,
First Justice of this Court.
Date: November 21, 2019
Francis B. Marinaro
Register of Probate

Janice J. Cook, Esq.
Donovan O'Connor & Dodig, LLP
1330 Mass MoCA Way
North Adams, MA 01247
12/05/19

Commonwealth of Massachusetts
The Trial Court
Probate and Family Court
Berkshire Probate and Family Court
44 Bank Row
Pittsfield, MA 01201
(413) 442-6941

CITATION ON PETITION FOR FORMAL ADJUDICATION

Docket No. BE19P0828EA

Estate of: Anthony Philip Emard
Also known as: Anthony P Emard
Date of Death: 10/20/2019

To all interested persons:
A Petition for **Formal Adjudication of Intestacy and Appointment of Personal Representative** has been filed by **Shelby E Emard of Mulberry FL** requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that **Shelby E Emard of Mulberry FL** be appointed as Personal Representative(s) of said estate to serve **With Corporate Surety** on the bond in **an unsupervised** administration

IMPORTANT NOTICE

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. You have a right to object to this proceeding. To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m. on the return day of 12/18/2019. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you.

UNSUPERVISED ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE CODE (MUPC)

A Personal Representative appointed under the MUPC in an unsupervised administration is not required to file an inventory or annual accounts with the Court. Persons interested in the estate are entitled to notice regarding the administration directly from the Personal Representative and may petition the Court in any matter relating to the estate, including the distribution of assets and expenses of administration.

WITNESS,
Hon. Richard A Simons,
First Justice of this Court.
Date: November 21, 2019
Francis B. Marinaro
Register of Probate

Angela W Hayden, Esq
Donovan O'Connor & Dodig, LLP
1330 Mass MoCA Way
North Adams, MA 01247
12/05/19

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **December 19, 2019 at 6 pm at The Orchards Hotel, 298 Adams Rd., Williamstown, MA 01267.** The proposed Marijuana Retail Establishment is anticipated to be located at 1017 Simonds Rd Williamstown, MA 01267. There will be an opportunity for the public to ask questions.
12/05/19

NOTICE OF MORTGAGEE'S SALE OF REAL ESTATE

Premises: 149 High Rise Road
Otis, MA 01253

By virtue and in execution of the Power of Sale contained in a certain mortgage given by Joshua C Taber to Mortgage Electronic Registration Systems, Inc., as Mortgagee, as nominee for Village Mortgage Company, and now held by **1800 Capital Trust II, by U.S. Bank Trust National Association, not in its Individual Capacity but solely as Certificate Trustee,** said mortgage dated October 9, 2013 and recorded in the Berkshire County (Middle District) Registry of Deeds in Book 5280, Page 278, said mortgage was assigned from Mortgage Electronic Registration Systems, Inc., as nominee for Village Mortgage Company to Wells Fargo Bank, N.A. by assignment dated September 5, 2014 and recorded with said Registry of Deeds in Book 5405, Page 288, said mortgage was assigned from Wells Fargo Bank, N.A. to The Secretary of Housing and Urban Development by assignment dated October 5, 2016 and recorded with said Registry of Deeds in Book 5805, Page 33, said mortgage was assigned from The Secretary of Housing and Urban Development to Bayview Loan Servicing, LLC by assignment dated December 12, 2016 and recorded with said Registry of Deeds in Book 5805, Page 37, said mortgage was assigned from Bayview Loan Servicing, LLC to Bayview Dispositions IVB, LLC by assignment dated July 12, 2018 and recorded with said Registry of Deeds in Book 6292, Page 118, said mortgage was assigned from Bayview Dispositions IVB, LLC to 1900 Capital Trust II, by U.S. Bank Trust National Association, not in its Individual Capacity but solely as Certificate Trustee by assignment dated July 12, 2018 and recorded with said Registry of Deeds in Book 6292, Page 121; for breach of the conditions in said mortgage and for the purpose of foreclosing the same will be sold at **Public Auction on** January 3, 2020 at 4:00PM Local Time upon the premises, all and singular the premises described in said mortgage, to wit:

Commencing at a point at the southeasterly corner of land conveyed by Frank L. Bryant to Vita Vitello, et. ux. which point is one thousand two hundred eighty (1,280) feet southerly of the half-way and running thence,

Southerly along said right of way by a course perpendicular to the southerly line of said Route 23, two hundred seventy-five (275) feet, more or less, to land now or formerly of one Kibbe, known as "Kibbe Farm", thence

Westerly along land of said Kibbe to the southeasterly corner of land of one Poulin, thence

Northerly along a stone wall at land of Poulin, two hundred seventy-five (275) feet, more or less, to the southwesterly corner of land of said Vitello, thence

Easterly along land of said Vitello to the point of beginning.

Together with a right of way over a driveway as now laid out from said State Highway Route 23, to the above described premises, said driveway running along the southeasterly line of land of said Vitello and land of Miller and Wilson.

The above described premises are conveyed subject to any rights of way which may exist for the benefit of Clifford Clark or others as access to the "Clark Farm", so-called.

Being the same premises conveyed to Joshua C Taber by deed dated 10-1-2013 and recorded in the Berkshire Middle District Registry of Deeds in Book 5280, Page 276.

The description of the property contained in the mortgage shall control in the event of a typographical error in this publication.

For Mortgagor's Title see deed dated October 1, 2013 and recorded in the Berkshire County (Middle District) Registry of Deeds in Book 5280, Page 275.

TERMS OF SALE: Said premises will be sold and conveyed subject to all liens, encumbrances, unpaid taxes, tax titles, municipal liens and assessments, if any, which take precedence over the said mortgage above described.

FIVE THOUSAND ($5,000.00) Dollars of the purchase price must be paid in cash, certified check, bank treasurer's or cashier's check at the time and place of the sale by the purchaser. The balance of the purchase price shall be paid in cash, certified check, bank treasurer's or cashier's check within thirty (30) days after the date of sale.

Other terms to be announced at the sale.

Orlans & Scott PLLC
1080 Main Street, Suite 200
Pawtucket, RI 02860
Attorney for 1900 Capital Trust II, by U.S. Bank Trust National Association, not in its Individual Capacity but solely as Certificate Trustee
Present Holder of the Mortgage
401-217-8701
11/28/19, 12/05/19, 12/12/19

Public Notice

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **December 19, 2019 at 5:30pm at the Sheffield Town Hall at 21 Depot Square, Sheffield, MA.** The proposed cultivation, manufacture and retail facility is anticipated to be located at 775 N. Main Street, Sheffield, MA. There will be an opportunity for the public to ask questions.
12/05/19

TOWN OF LANESBOROUGH LICENSING BOARD PUBLIC NOTICE

Notice is hereby given that an application for an Alteration of Premises of the §12 All Alcoholic Beverages Restaurant License has been filed with the Board of Selectmen for the Town of Lanesborough by V's Doghouse LLC d/b/a The Brookhouse.

The premises are located at 650 Cheshire Road, Lanesborough, MA.

Said application will be considered at a meeting of this Board at the **Newton Memorial Town Hall, 83 North Main Street, Lanesborough, Massachusetts at 6:00 p.m. on December 23, 2019.**

Board of Selectmen
Acting as Local Licensing Authority

By John Goerlach, Chairman
12/05/19

Williamstown
Zoning Board of Appeals
PUBLIC HEARING
Thursday, DECEMBER 19th, 2019

The following public hearing will be held by the **Zoning Board of Appeals at the Municipal Building, 31 North Street, Williamstown, Mass. on Thursday the 19th of December, 2019 at 7 PM**

7:00 PM (2019 - 16)
Upon the petition of Berkshire Housing Development Corporation for renewal of the previously granted Comprehensive Permit for a 46 unit housing development, affordable to a mix of income levels, on land owned by the Town of Williamstown at 330 Cole Avenue in accordance with Chapter 40B, MGL

LOCATION
330 Cole Avenue
ASSESSORS PARCEL: 119-18
DISTRICT: General Residential

7:05 PM (2019 - 17)
Upon the petition of Guy Sheppard to reestablish a previously existing non-conforming building lot for property located at 1446 Cold Spring Rd. The Board will hear this petition in accordance with §70-1 of the Code of the Town of Williamstown.

LOCATION
1446 Cold Spring Road
ASSESSORS PARCEL:
21-50, 52, 53
DISTRICT: Rural Residential 3

7:10 PM (2019 - 18)
Upon the petition of Dave Cannable for a Special Permit for a Marijuana Retail Establishment at 217 Main St. This petition will be heard in accordance with §70-3, §70-4.3, & §70-8 of the Code of the Town of Williamstown.

LOCATION
217 Main Street
ASSESSORS PARCEL: 112-6
DISTRICT: Planned Business

The applications and/or plans for the above-mentioned petitions are available for review in the Community Development Office at the Municipal Building, 31 North Street, Third Floor, between the hours of 8:30 AM and 4:30 PM or anytime at
www.WilliamstownMA.gov

Andrew Hosr, Chair
Williamstown
Zoning Board of Appeals
12/05/19, 12/12/19

Announcements

BECKET CHAISE TEAM
to perform at free supper
There will be a free Christmas concert performed by the Becket Chaise Team following the free community supper at the Becket Federated Church on Friday, Dec. 6th.
The free supper is 5-7PM and the free concert starts at 7PM. A free will offering will be taken for the benefit of the Becket Food Pantry. The church is at 3381 Main St. Becket.

Business Rentals

PITTSFIELD. Elm Street 1,200 sf retail space in busy shopping center. Prime location. **845-638-0600**

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413-496-6340

ATTACHMENT B
MEETING NOTICE FILED
WITH SHEFFIELD TOWN
ADMINISTRATOR ON
DEC 3 2019

Public Notice

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **December 19, 2019 at 5:30pm at the Sheffield Town Hall at 21 Depot Square, Sheffield, MA.** The proposed cultivation, manufacture and retail facility is anticipated to be located at 775 N. Main Street, Sheffield, MA. There will be an opportunity for the public to ask questions.

12/05/19

ATTACHMENT 3
MEETING NOTICE
FILED WITH
SHEFFIELD TOWN
ADMINISTRATOR
ON NOV 21 2019

Public Notice

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MEETING NOTICE FILED
WITH SHEFFIELD TOWN
ADMINISTRATOR ON
NOV 21, 2019

Public Notice

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11/25/19

ATTACHMENT B
MEETING NOTICED FILED
WITH SHEFFIELD TOWN
ADMINISTRATOR ON NOV 21
2019

Scot Trifilo

From:	Scot Trifilo <scot@terracehomebuilders.com>
Sent:	Thursday, November 21, 2019 3:09 PM
To:	rlabombard@sheffieldma.gov
Cc:	Jill Hughes
Subject:	Ten-Ten Community Outreach Meeting notice filed with the Town of Sheffield. Meeting date: December 3, 2019
Attachments:	Public Notice for Dec 3 2019 meeting.docx; 12-3-19 Community Outreach Public Meeting legal notice.pdf

Hi Rhonda,

Per the CCC guidelines, I must file a legal notice with the Town of Sheffield at least 7 calendar days prior to my Community Outreach Meeting.
Please see the attached legal notice and confirm receipt, noting that this was filed with the Town of Sheffield at least 7 calendar days prior to my Community Outreach Meeting.
I will see you on December 3rd at 3:30pm to get the key from you.
Please let me know if you need anything else.

Thank you,
Scot

Scot Trifilo
Ten-Ten Craft Cannabis
518.857.9000
scot.trifilo@gmail.com

ATTACHMENT B
MEETING NOTICE FILED WITH SHEFFIELD TOWN ADMINISTRATOR ON DEC 3 2019

Public Notice

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **December 19, 2019 at 5:30pm at the Sheffield Town Hall at 21 Depot Square, Sheffield, MA.** The proposed cultivation, manufacture and retail facility is anticipated to be located at 775 N. Main Street, Sheffield, MA. There will be an opportunity for the public to ask questions.

12/05/19

Scot Trifilo

From: Rhonda LaBombard <rlabombard@sheffieldma.gov>
Sent: Wednesday, December 4, 2019 11:03 AM
To: scot@terracehomebuilders.com
Subject: Re: Another Community Outreach meeting notice

Hi Scot,

Confirming receipt of your community outreach notice.

Rhonda

Rhonda LaBombard
Town Administrator
Town of Sheffield
21 Depot Square
Sheffield, MA 01257
(413) 229-7000, Ext. 152
(413) 229-7010 fax

"Scot Trifilo" <scot@terracehomebuilders.com> writes:
Hi Rhonda,

Per the new CCC guidelines, I must file another legal notice with the Town of Sheffield at least 14 calendar days prior to my next Community Outreach Meeting to be held on December 19th at 5:30 pm, 2019.
Please see the attached legal notice and confirm receipt, noting that this was filed with the Town of Sheffield at least 14 calendar days prior to my Community Outreach Meeting.
The meeting that I held tonight was for abutters, which is still a 7-day-prior mail notification per the new CCC guidelines.
I will see you on December 19th at 3:30 pm to get the key from you.
Please let me know if you need anything else.

Thank you,
Scot

Scot Trifilo
Ten-Ten Craft Cannabis
518.857.9000
scot.trifilo@gmail.com

Public Notice **ATTACHMENT C**

TO:
[redacted]
P.O. Box [redacted]
Sheffield, MA 01257

Notice is hereby given that a Community Outreach Meeting for a proposed organic pesticide free craft Marijuana Establishment is scheduled for December 3, 2019 at 5:30pm at the Sheffield Town Hall at 21 Depot Square, Sheffield, MA. The proposed cultivation, manufacture and retail facility is anticipated to be located at 775 N. Main Street, Sheffield, MA. There will be an opportunity for the public to ask questions.

FROM:
Scot Trifilo
Ten-Ten LLC
54 Nelson Ave Ext
Saratoga Springs, NY 12866

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 the 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, **Scot Trifilo**, attest as an authorized representative of **TEN-TEN LLC** that the applicant has complied with the requirements of 935 CMR 500 (as revised on November 1, 2019), and the guidance for licensed applicants on community outreach (as to the information that is not contrary to the November 1, 2019, Revised Regulations), as detailed below.

1. The Community Outreach Meetings were held on **December 3, 2019, and December 19, 2019**.

2. Copies of the notices 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 **November 25, 2019, and December 5, 2019**, which were at least seven and fourteen calendar days prior to the respective meetings (in compliance with the old Guidance and the Revised Regulations). Copies of the newspaper notices are 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. Copies of the meeting notices were also filed on **November 21, 2019, and December 3, 2019**, respectively, 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. Copies of the municipal notices are 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 **November 23, 2019**, 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*).

Initials of Attester: _____

5. Information was presented at the community outreach meetings 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.

Initials of Attester: _____

Plan to Remain Compliant with Local Zoning

TEN-TEN LLC will remain compliant at all times with the local zoning requirements set forth by Sheffield. In compliance with 935 CMR 500.110(3), the property is not located within 500 feet of an existing public or private school providing education to children in kindergarten or grades 1 through 12. TEN-TEN will have a co-located facility at its proposed Marijuana Establishment address and has obtained local approval for that facility.

TEN-TEN has already attended meetings with various municipal officials and boards to discuss TEN-TEN's plans for a proposed Marijuana Cultivator, Marijuana Retail and Marijuana Product Manufacturer Establishment and has executed a Host Community Agreement with Sheffield. TEN-TEN will continue to work cooperatively with various municipal departments, boards, and officials to ensure that TEN-TEN marijuana establishment remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security. The building permits for reconstruction of the original building and new construction of the proposed building will be issued by the Sheffield Building Department upon review of the blueprints. Upon completion of the reconstruction of the original building, the Building Department will issue a Certificate of Occupancy for that building. Upon completion of the new construction of the proposed building, the Building Department will issue a Certificate of Occupancy for that new building. Both buildings will also receive Fire Department compliance approval prior to issuance of the Certificate of Occupancy's from the Building Department.

TEN-TEN owns the property location of 775 N Main St in Sheffield. The Sheffield Zoning Bylaws map show the property is located in the Commercial District. TEN-TEN's Indoor Cultivation, Outdoor Cultivation, Manufacturing & Retail adult-use establishment licenses are all allowed at this location as a matter of right (according to zoning). No Special Permit for this location is required for any of TEN-TEN's adult-use establishment license types. TEN-TEN is not subject to the Sheffield Adult-Use Marijuana Bylaw because TEN-TEN was granted a Host Community Agreement prior to the Public Hearing for the Adult-Use Marijuana Bylaw, as noted in the below attached letter from the Sheffield Town Administrator.

Town of Sheffield
Office of the Town Administrator
Town Hall – 21 Depot Square
Sheffield, Massachusetts 01257

Voice: 413-229-7000
Fax: 413-229-7010
TTY: 800-439-2370

May 28, 2019

To Whom it May Concern:

The Town of Sheffield recently passed an Adult Use Marijuana Bylaw. Ten-Ten LLC at 775 North Main Street, Sheffield, MA is not subject to this bylaw because they applied for their Host Agreement and held a Community Outreach Meeting before the public hearing for the bylaw was advertised.

Please contact my office at 413-229-7000, Ext. 152, if you have any questions.

Sincerely,

Rhonda LaBombard

Rhonda LaBombard
Town Administrator

This institution is an equal opportunity employer and provider.

TO: Town of Sheffield (Host Community)
21 Depot Square
Sheffield, MA 01257

FROM: Scot Trifilo
Ten-Ten LLC
775 N. Main ST
Sheffield, MA 10257

RE: Request for cost records - Ten-Ten LLC to Host Community

DATE: May 10, 2021

This letter is to request the records of any costs imposed on the town that are reasonably related to the operation of Ten-Ten LLC as required by the MA CCC. In accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a ME or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

The above request is required as noted in the below guidance documents from the MA CCC:

Proof that the licensee requested from the host community the records of any costs imposed on the city or town that are reasonably related to the operation of the ME or MTC. The licensee's request shall state that, In accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a ME or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26. Documentation shall include the request and the substantive response from the city or town that includes the actual and anticipated expenses resulting from the operation. If the city or town does not submit a substantive response, the licensee shall provide an attestation to that effect.

Thank you,

Scot Trifilo
Ten-Ten LLC
775 N. Main St
Sheffield, MA 10257

Host Community - Request For Any Records of Cost Attestation

I, **Scot Trifilo**, attest as an authorized representative of **Ten-Ten LLC** that the applicant has not received a substantive response from the town of Sheffield that includes the actual and anticipated expenses resulting from the operation. Ten-Ten LLC is non-operational and holds only Provisional Licenses.

Date: May 17, 2021

Signature of Attester: Scot Trifilo

Scot Trifilo

TEN-TEN LLC's Plan to Positively Impact Areas of Disproportionate Impact (ADIs)

Positive Impact Plan and Measuring Success

Goal 1 – Provide Effective Industry-specific Education to 30 participants in 2 sessions per year in Pittsfield, with 80% of participants from Areas of Disproportionate Impact

Program to support Goal 1

- TEN-TEN LLC (TEN-TEN) will conduct two (2) one-hour industry-specific educational seminars annually covering one or more of the following topics: marijuana cultivation, marijuana product manufacturing, marijuana retailing, or marijuana business operations;
- To promote these educational sessions, TEN-TEN will submit notices to the community calendar section of the local newspaper (for each of the four (4) weeks before the event), and send information within 30 days before the Seminar to the following locations that focus on providing employment support to individuals from ADIs:
    - MassHire Springfield Career Center, 103-3, 1 Federal St, Springfield, MA 01105
    - MassHire Berkshire Career Center, 160 North Street, 3rd Floor, Pittsfield, MA 01201
    - Project Reconnect, 160 North St., Pittsfield, MA 01201; and
- TEN-TEN will conduct the seminars in Pittsfield, where there is easy access for those who are local and access to public transportation for those from other ADIs, such as North Adams and portions of Springfield and West Springfield.

Metrics used to Measure TEN-TEN's Success in Meeting Goal 1

- TEN-TEN will record where, when and how the Seminars were advertised and held;
- TEN-TEN will record the number of participants at each Seminar;
- TEN-TEN will track the number of participants and the percentage from ADIs;
- TEN-TEN will maintain copies of the materials provided, and presentations made;
- TEN-TEN will survey those in attendance asking: why they attended, where they reside, their evaluation of the speaker(s) and materials, requests for improvement and for ideas to recruit others to attend the seminars; and
- TEN-TEN shall evaluate the success in meeting Goal 1 after each educational Seminar, and quarterly, as part of TEN-TEN's overall assessment of the progress of their Positive Impact Plan. TEN-TEN shall report progress annually to the CCC. TEN-TEN will provide to the CCC, where, when, and how the seminars were held and advertised, the number of participants at each event, the number of and percentage from ADIs, the materials provided, the surveys, and responses from the participants.

Goal 2 – Provide Financial Education to 45 participants per year in Pittsfield, with 80% of the participants from Areas of Disproportionate Impact

Program to support Goal 2:

- TEN-TEN will hire local experts to provide annual two-hour personal finance trainings in both Pittsfield and North Adams. The topics will include budgeting, banking, debt

consolidation, credit, understanding and improving one's credit score, and a question and answer session for attendees.

- In the month prior to the event, TEN-TEN will advertise the event, by mailing flyers to:
    - the community activity section of local newspapers;
    - the local senior and community centers for their bulletin boards and requesting announcements be made at their meetings;
    - the Department of Children and Families, for parents in need of personal finance training, also emailing the supervisors with a copy of the flyer;
    - the Elizabeth Freemen Center, for victims of domestic violence in need of personal finance training;
    - the local homeless shelters and transitional living shelters including Barton's Crossing and the Louison House;
    - Berkshire Housing and the MassHire Berkshire Career Center;
    - and will notice local attorneys who represent indigent clients.

Metrics used to Measure TEN-TEN's Success in Meeting Goal 2

- TEN-TEN will record where, when and how the trainings were advertised and held;
- TEN-TEN will record the number of participants in each training;
- TEN-TEN will track the number of and percentage of participants from ADIs;
- TEN-TEN will maintain copies of the materials provided, and presentations made;
- TEN-TEN will survey those in attendance asking: why they attended, where they reside, their evaluation of the speaker(s) and materials, requests for improvement and for ideas to recruit others to attend the seminars; and
- TEN-TEN shall evaluate the success in meeting Goal 1 after each educational Seminar, and quarterly, as part of TEN-TEN's overall assessment of the progress of their Positive Impact Plan. TEN-TEN shall report progress annually to the CCC. TEN-TEN will provide to the CCC, where, when, and how the seminars were held and advertised, the number of participants at each event, the number of and percentage from ADIs, the materials provided, the surveys, and responses from the participants.

Goal 3 – Hold local Criminal Record Sealing & Expunging Events with 25 participants twice per year in Pittsfield, with 80% of the participant from Areas of Disproportionate Impact

Program to support Goal 3:

- TEN-TEN will hold two informational sessions annually regarding sealing and expunging criminal records;
- TEN-TEN will provide all of the necessary paperwork to accomplish an expungement or sealing of a record at the event and provide a checklist of the steps required to complete the process;
- In the month prior to the event, TEN-TEN will advertise the event, by mailing flyers to:
    - the community activity section of local newspapers;

- the local senior and community centers for their bulletin boards and requesting announcements be made at their meetings;
- the Department of Children and Families, for parents in need of personal finance training, also emailing the supervisors with a copy of the flyer;
- the Elizabeth Freemen Center, for victims of domestic violence in need of personal finance training;
- the local homeless shelters and transitional living shelters including Barton's Crossing and the Louison House;
- Berkshire Housing and the MassHire Berkshire Career Center; and
- will notice local attorneys who represent indigent clients.

Metrics used to Measure TEN-TEN's Success in Meeting Goal 3

- TEN-TEN will maintain information regarding where, when and how the trainings were advertised and held;
- TEN-TEN will record the number of participants in each training;
- TEN-TEN will track the number of and percentage of participants from ADIs;
- TEN-TEN will maintain the materials provided, and presentations made;
- TEN-TEN will survey of those in attendance asking: why they attended, where they reside, their opinion on the speaker(s) and materials, and requests for improvement and request ideas to recruit others to attend the seminars; and
- TEN-TEN shall evaluate the success in meeting Goal 1 after each educational Seminar, and quarterly, as part of TEN-TEN's overall assessment of the progress of their Positive Impact Plan. TEN-TEN shall report progress annually to the CCC. TEN-TEN will provide to the CCC, where, when, and how the seminars were held and advertised, the number of participants at each event, the number of and percentage from ADIs, the materials provided, the surveys, and responses from the participants.

TEN-TEN will, quarterly, review its progress toward meeting all Goals to determine how their programs are positively impacting ADIs. Annually, TEN-TEN will provide to the CCC, TEN-TEN's progress toward each Goal, including the details on where, when and how the seminars were held and advertised, the number of participants at each event, the number of and percentage of people from ADIs, the materials provided at the event and the results of the surveys from the participants.

Acknowledgments

TEN-TEN acknowledges and is aware of, and will adhere to, the requirements set forth in 935 CMR 500.105(4), which describes the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.

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

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: 001347065

1. The exact name of the limited liability company is: TEN-TEN LLC

2a. Location of its principal office:
No. and Street: 775 N. MAIN STREET
City or Town: SHEFFIELD State: MA Zip: 01257 Country: USA

2b. Street address of the office in the Commonwealth at which the records will be maintained:
No. and Street: 775 N. MAIN STREET
City or Town: SHEFFIELD State: MA Zip: 01257 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:
REGISTERED MASSACHUSETTS MARIJUANA ESTABLISHMENT

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:
Name: SCOT TRIFILO
No. and Street: 775 N. MAIN STREET
City or Town: SHEFFIELD State: MA Zip: 01257 Country: USA

I, Scot Trifilo 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:

Name	Address (no PO Box) Address, City or Town, State, Zip Code
SCOT TRIFILO	54 NELSON AVE EXT SARATOGA SPRINGS, NY 12866 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.

Name	Address (no PO Box) Address, City or Town, State, Zip Code
SCOT TRIFILO	54 NELSON AVE EXT SARATOGA SPRINGS, NY 12866 USA

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:

Name	Address (no PO Box) Address, City or Town, State, Zip Code
SCOT TRIFILO	54 NELSON AVE EXT SARATOGA SPRINGS, NY 12866 USA

9. Additional matters:

TEN-TEN LLC WILL NOT ENGAGE IN THE SALE OR CULTIVATION OF MARIJUANA OR ANY OF THE RELATED REGULATED PRODUCTS. ONCE THE ENTITY RECIEVES THE NECESSARY LICENSURE AND APPROVAL FROM THE CANNABIS CONTROL COMMISSION IT WILL THEN FILE A CERTIFICATE OF AMENDMENT, AMENDING THE PURPOSE REMOVING THE DISCLAIMER. THIS AMENDMENT WILL THEN BE APPROVED AND ENDORSED BY THE CANNABIS CONTROL COMMISSION PRIOR TO FILING WITH YOUR OFFICE.

Filer's Contact Information

(Enter a contact name, mailing address, and email and/or phone number.)

Contact Name: SCOT TRIFILO
Business Name: TEN-TEN LLC
No. and Street: 54 NELSON AVE EXT
City or Town: SARATOGA SPRINGS State: NY Zip: 12866 Country: USA
Contact Phone: (518) 857-9000 ext:
Contact Email: scot@terracehomebuilders.com

Please provide an email address to receive an expedited response from the Corporations Division. If the filing is rejected for any reason, you will be contacted. If no email address is provided, correspondence from the Division will be sent by mail.

SIGNED UNDER THE PENALTIES OF PERJURY, this 21 Day of September, 2018,
Scot Trifilo

(The certificate must be signed by the person forming the LLC.)

Make Corrections Accept

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All Rights Reserved

OPERATING AGREEMENT OF

TEN-TEN LLC

THIS OPERATING AGREEMENT is made and entered into as of September 21, 2018 by and among Ten-Ten LLC (the "Company") and the Member(s) signing below.

ARTICLE I
DEFINITIONS

The following terms used in this Operating Agreement shall have the following meanings:

"Articles of Organization" shall mean the Articles of Organization of the Company as filed with the Secretary of Commonwealth of Massachusetts, as amended from time to time.

"Capital Contribution" shall mean any contribution to the capital of the Company in cash or property by the Member(s) whenever made.

"Cash Flow" shall mean the gross cash proceeds from the operation of the Company's business less the portion thereof used to establish Reserves for or to pay Company expenses, debt payments and capital expenditures. "Cash Flow" shall include any net cash proceeds from the sale or disposition of Company property and from the refinancing of indebtedness of the Company, shall be increased by any reduction of Reserves previously established by the Member(s), and shall not be reduced by depreciation, cost recovery, amortization or similar non-cash deductions.

"Company" shall refer to Ten-Ten LLC

"Entity" shall mean any general partnership, limited partnership, limited liability partnership, limited liability company, corporation, joint venture, trust, business trust, cooperative, association, foreign trust, foreign business organization or other business entity.

"Fiscal Year" shall mean the period terminating on December 31 of each year during the term hereof.

"Initial Capital Contribution" shall mean the initial contribution to the capital of the Company pursuant to Paragraph 7.01 of this Operating Agreement.

"Limited Liability Company Law" shall mean the Massachusetts Limited Liability Company Law, as amended from time to time.

"Manager" has the meaning ascribed to such term in Paragraph 4.01 of this Operating Agreement.

"Member" shall mean the Person who has executed a counterpart of this Operating Agreement as a Member and any Person who may hereafter become a member of the Company.

"Net Profits" and "Net Losses" shall mean the income, gain, loss, deductions and credits of the Company in the aggregate or separately stated, as appropriate, as of the close of each Fiscal Year.

"Operating Agreement" shall mean this Operating Agreement as originally executed and as amended from time to time.

"Person" shall mean any individual or Entity, and the heirs, executors, administrators, legal representatives, successors and assigns of such "Person," where the context so permits.

"Representative" shall mean the legally appointed guardian of a mentally incapacitated Member, the conservator of a mentally incapacitated Member's assets or the legally appointed and qualified executor or personal representative of the estate of a deceased Member. In the event no such guardian, executor or personal representative is appointed, then the Representative shall mean the spouse of such incapacitated or deceased Member, or if such Member does not have a spouse or the spouse is not then living or is unable or unwilling to act, such Member's then living lineal descendants who are willing and capable of acting, one at a time in descending order of age but in no event younger than 21 years of age or, if none, such Member's then-living lineal ancestors who are willing and capable of acting, one at a time and in ascending order of age.

"Reserves" shall mean funds set aside or amounts allocated to reserves which shall be maintained in amounts deemed sufficient by the Manager for working capital and to pay taxes, insurance, debt service or other costs or expenses incident to the ownership or operation of the Company's business.

ARTICLE II
FORMATION OF COMPANY

2.01 Formation. The Company shall be, or has been, organized as a Massachusetts State limited liability company by executing and delivering Articles of Organization to the Massachusetts Secretary of the Commonwealth in accordance with and pursuant to the Limited Liability Company Law.

2.02 Name. The name of the Company is "Ten-Ten LLC."

2.03 Principal Place of Business. The principal place of business of the Company is 775 N. Main Street, Sheffield, MA 01257. The Company may locate its places of business and registered office at any other place or places as the Manager may deem advisable.

2.04 Registered Office and Registered Agent. The Company's initial registered office shall be at the office of its registered agent as contained in the Articles of Organization and the name of its initial registered agent shall be as contained in the Articles. The registered office and registered agent may be changed by the Manager by filing the address of the new registered office and/or the name of the new registered agent with the Massachusetts Secretary of the Commonwealth pursuant to the Limited Liability Company Law.

2.05 Term. The term of the Company shall be perpetual, unless the Company is earlier dissolved in accordance with either the provisions of this Operating Agreement or the Limited Liability Company Law.

ARTICLE III
BUSINESS OF COMPANY

3.01 Purpose. The business of the Company shall be to conduct any lawful business whatsoever that may be conducted by limited liability companies pursuant to the Limited Liability Company Law.

ARTICLE IV
MANAGEMENT OF THE COMPANY

4.01 Management of Company. The management of the Company shall be vested solely in a Manager selected by the Member(s) (the "Manager"). The Manager shall have the exclusive power and authority on behalf and in the name of the Company to carry out the purposes of the Company to perform all acts and enter into and perform all contracts and other undertakings which it may deem necessary or advisable in connection therewith and to take any and all actions not inconsistent with the limitations contained in this Agreement necessary to operate the business of the Company. The initial Manager of the Company shall be Scot Trifilo. The initial Manager shall serve until resignation, incapacity or death. In the event of resignation, the Manager shall select the successor Manager. In the event of death, the remaining Members or, if there are none, the estate administrator of Mr. Trifilo's estate shall select a successor. In the event of incapacity, the other Members, if any, shall select a successor Manager or, if there are no other Members, Mr. Trifilo's attorney shall select a successor Manager, and in any case such successor Manager shall serve until such time as the initial Manager is no longer incapacitated. The term "incapacity" shall mean that the Manager is unavailable or unable to perform their duties due to health reasons for a period of time in excess of thirty (30) or more calendar days.

4.02 Removal. The Manager may be removed as Manager at any time, with or without cause, by an affirmative vote of the Member(s), but no such removal shall affect the contract and/or ownership rights, if any, of the Person so removed.

4.03 Compensation and Reimbursement of Expenses. The Company shall reimburse the Manager for all ordinary, necessary and direct expenses incurred by the Manager on behalf of the Company in carrying out the Company's business activities. The Manager shall not receive compensation for its services unless approved by the Members.

4.04 Execution of Documents. Any document or instrument of any and every nature, including without limitation, any agreement, contract, deed, promissory note, mortgage or deed of trust, security agreement, financing statement, pledge, assignment, bill of sale and certificate, which is intended to bind the Company or convey or encumber title to its real or personal property shall be valid and binding for all purposes only if executed by the Manager.

4.05 Action without Meeting. Any action required to be taken by or on behalf of the Company may be taken without a meeting if a consent, in writing, setting forth the action so

taken, shall be signed by the Manager and the Member(s) holding a majority of the membership interests.

4.06 Officers. The Manager may from time to time appoint officers of the Company and assign in writing titles of such individuals. The officers shall exercise such powers and perform such duties as are prescribed by the Manager. Any number of offices may be held by the same person, as the Manager may determine.

4.07 Term of Office. The officers shall hold office for the term for which they were appointed and until their successors are elected and qualified; provided, however, that any officer may be removed at any time with or without cause by the Manager.

4.08 Limitation on Liability. The Manager will not be personally liable for any obligations, liabilities, debts or losses of the Company, whether arising in tort, contract or otherwise, except as otherwise required by law. The Manager and shall be entitled to indemnification by the Company as provided in this Article V.

4.09 Standard of Care. No Manager shall be liable to the Company or to any Member for any loss or damage sustained by the Company or any Member except loss or damage resulting from intentional misconduct or knowing violation of law or a transaction for which such Manager received a personal benefit in violation or breach of the provisions of this Operating Agreement. The Manager shall be entitled to rely on information, opinions, reports or statements, including but not limited to financial statements or other financial data prepared or presented by: (a) any one or more Members, officers or employees of the Company whom the Manager reasonably believes to be reliable and competent in the matter presented, (b) legal counsel, public accountants, or other persons as to matters the Manager reasonably believes are within the Person's professional or expert competence, or (c) a committee which the Manager is not a member, and if the Manager reasonably believes the committee merits confidence.

4.10 Manager Has No Exclusive Duty to Company. The Manager shall not be required to manage the Company as the Manager's sole and exclusive function, and the Manager may have other business interests and may engage in other activities in addition to those relating to the Company as long as Manager discharges its duties under this Operating Agreement in a professional and diligent manner, and such activities do not compete, directly or indirectly, with the Company. Neither the Company nor any Member shall have any right, by virtue of this Operating Agreement, to share or participate in such other investments or activities of the Manager or to the income or proceeds derived therefrom. The Manager shall incur no liability to the Company or to the Member(s) as a result of engaging in any other business or ventures.

ARTICLE V
ADDITIONAL RIGHTS AND OBLIGATIONS

5.01 Right to Indemnification. Subject to the limitations and conditions provided in this Article V and in the Limited Liability Company Law, each Person ("Indemnified Person") who was or is made a party or is threatened to be made a party to or is involved in any threatened, pending or completed action, suit or proceeding, whether civil, criminal, administrative, arbitrative or investigative ("Proceeding"), or any appeal in such a Proceeding or any inquiry or

investigation that could lead to such a Proceeding, by reason of the fact that she or he was or is a Manager, a Member, or an officer of the Company or she or he was or is the legal representative of or a manager, director, officer, partner, venturer, proprietor, trustee, employee, agent or similar functionary of a Member or of an officer of the Company, shall be indemnified by the Company against judgments, penalties (including excise and similar taxes and punitive damages), fines, settlements and reasonable costs and expenses (including, without limitation, attorneys' fees) actually incurred by such Indemnified Person in connection with such Proceeding if such Indemnified Person acted in good faith and in a manner she or he reasonably believed to be in, or not opposed to, the best interest of the Company and, with respect to any criminal action or proceeding, had no reasonable cause to believe her or his conduct was unlawful. The termination of any action, suit or proceeding by judgment, order, settlement, conviction, or upon a plea of nolo contendere or its equivalent, shall not, of itself, create a presumption that the Indemnified Person did not act in good faith and in a manner which she or he reasonably believed to be in or not opposed to the best interests of the Company or, with respect to any criminal action or proceeding, that the Indemnified Person had reasonable cause to believe that her or his conduct was unlawful.

5.02 Survival. Indemnification under this Article V shall continue as to a Person who has ceased to serve in the capacity which initially entitled such Person to indemnity hereunder. The rights granted pursuant to this Article V shall be deemed contract rights, and no amendment, modification or repeal of this Article V shall have the effect of limiting or denying any such rights with respect to actions taken or Proceedings arising prior to any such amendment, modification or repeal.

5.03 Advance Payment. The right to indemnification conferred by this Article V shall include the right to be paid or reimbursed by the Company for the reasonable expenses incurred in advance of the final disposition of the Proceeding and without any determination as to the Indemnified Person's ultimate entitlement to indemnification; provided, however, that the payment of such expenses incurred in advance of the final disposition of a Proceeding shall be made only upon delivery to the Company of a written affirmation by such Indemnified Person of her or his good faith belief that she or he has met the standard of conduct necessary for indemnification under this Article V and a written undertaking, by or on behalf of such Indemnified Person, to repay all amounts so advanced if it shall ultimately be determined that such Indemnified Person is not entitled to be indemnified under this Article V or otherwise.

5.04 Nonexclusivity of Rights. The right to indemnification and the advancement and payment of expenses conferred by this Article V shall not be exclusive of any other right which a Person may have or hereafter acquire under any law (common or statutory), provision of the Articles of Organization or Operating Agreement, agreements, vote of members or otherwise.

5.05 Savings Clause. If Paragraph 5.01 or any portion thereof shall be invalidated on any ground by any court of competent jurisdiction, then the Company shall nevertheless indemnify and hold harmless each Indemnified Person as to costs, charges and expenses (including attorneys' fees), judgments, fines and amounts paid in settlement with respect to any action, suit or proceeding, whether civil, criminal, administrative or investigative to the full extent permitted by any applicable portion of this Article V that shall not have been invalidated and to the fullest extent permitted by applicable law.

ARTICLE VI
MEMBERS

6.01 Members. Scot Trifilo is the initial sole Member of the Company. Exhibit A attached hereto shall list all Members of the Company and shall be amended as needed to update the Members. A Member's membership Interest may be transferred, sold or assigned with the written approval of the Manager. The Company may create more than one class of membership interests and/or options for membership interests, upon the approval of the Member(s) and the Manager.

6.02 Transferees Bound. Any transferee of a membership interest in the Company shall be bound by all of the terms and restrictions of this Operating Agreement.

6.03 Limitation of Liability. No Member or agent of the Company (nor any Person acting in one or more of those capacities) shall be liable for any debts, obligations or liabilities of the Company or each other, whether arising in tort, contract or otherwise, solely by reason of being such a Member or agent or acting (or omitting to act) in such capacities or participating (as an employee, consultant, contractor or otherwise) in the conduct of the business of the Company.

6.04 Indemnification. The Company shall indemnify and hold harmless each Member from and against all claims and demands to the maximum extent permitted under the Limited Liability Company Law.

6.05 Annual Meetings. Meetings of the Members shall be held annually in the month of January. Meetings of Members may be held at the principal place of business of the Company or such place or places, within or without the State of Massachusetts, as shall be determined by a majority of the Membership Interests and stated in the notice thereof. Members of the Company may participate in a meeting by means of conference telephone or similar communications equipment by means of which all persons participating in the meeting can hear each other, and such participation shall constitute presence in person at such meeting.

6.06 Special Meetings. A meeting of the Members for any purpose or purposes may be called at any time upon the written request of a majority of the Membership Interests entitled to vote at such meeting. Notice of such meeting shall be sent to all Members. Such notice shall state the purpose for which such meeting is to be called, the day, time, location and telephone or video conference number for attendance.

6.07 Quorum. Members holding not less than a majority of all Membership Interests, represented in person or by proxy, shall constitute a quorum at any meeting of Members. In the absence of a quorum at any meeting of Members, a majority of the Membership Interests so represented may adjourn the meeting from time to time for a period not to exceed sixty days without further notice. However, if the adjournment is for more than 60 days, or if after the adjournment a new record date is fixed for the adjourned meeting, a notice of the adjourned meeting shall be given to each Member of record entitled to vote at such meeting. At an adjourned meeting at which a quorum shall be present or represented, any business may be transacted that might have been transacted at the meeting as originally noticed. The Members present at a meeting may continue to transact business until adjournment, notwithstanding the

withdrawal during the meeting of Membership Interests whose absence results in less than a quorum being present.

6.08 Manner of Acting. If a quorum is present at any meeting, the vote or written consent of Members holding not less than a majority of Membership Interests shall be the act of the Members, unless the vote of a greater or lesser proportion or number is otherwise required by the Limited Liability Company Law, the Articles of Organization or this Agreement.

6.09 Voting, Actions by Written Consent. Any action required or permitted to be taken at a meeting of Members may be taken without meeting, without prior notice and without vote, if a consent in writing, setting for the action so taken, shall be signed by all Members.

ARTICLE VII
CONTRIBUTIONS TO THE COMPANY

7.01 Member's Initial Capital Contributions. The Member agrees to contribute One Hundred Dollars ($100.00) as the Member's Initial Capital Contribution to the Company.

7.02 Subsequent Contributions. The Member may, but shall not be obligated to, make any Capital Contributions to the Company other than those set forth in Paragraph 7.01.

7.03 Loans by Members. The Member may, but is not obligated to, loan to the Company such sums as the Member determines to be appropriate for the conduct of the Company's business. Any such loans shall bear interest at the applicable federal rate of interest and shall be on such other terms as the Member(s) and Manager may agree.

ARTICLE VIII
ALLOCATIONS AND DISTRIBUTIONS

8.01 Allocations of Profits and Losses. All of the Net Profits and Net Losses of the Company for each Fiscal Year shall be allocated to the Member(s) in a manner consistent with the requirements of the Code, including any elective allocations thereunder, as determined by the Manager.

8.02 Distributions of Cash Flow. Cash Flow shall be distributed to the Member(s) at such time or times as the Member(s) and the Manager shall determine provided, however, that at a minimum, the Company shall make distributions quarterly to the Member(s) sufficient to meet the federal and state income taxes which shall be owed by the Member(s), if any, as a result of the allocations of Net Profits and Net Losses to the Member(s).

8.03 Limitation upon Distributions.

(a) No distribution or return of capital contributions may be made and paid if, after the distribution or return of a capital contribution, either:

(i) the Company would be insolvent; or

(ii) the net assets of the Company would be less than zero.

(b) The Manager may base a determination that a distribution or return of a capital contribution may be made under Paragraph 8.03(a) in good faith reliance upon a balance sheet and profit and loss statement of the Company represented to be correct by the Person having charge of its books of account or certified by an independent public or certified public accountant or firm of accountants to fairly reflect the financial condition of the Company.

ARTICLE IX
DISSOLUTION AND TERMINATION

9.01 Dissolution. The Company shall be dissolved upon the occurrence of any of the following events:

(i) The entry of a decree of judicial dissolution under the Limited Liability Company Law; or

(ii) by the written decision of the Member(s) or the Manager.

9.02 Winding Up, Liquidation and Distribution of Assets.

(a) If the Company is dissolved and its affairs are to be wound up, the Manager (or the Representative) is directed to:

(i) sell or otherwise liquidate such of the Company's assets as may be required to discharge all liabilities of the Company, including any liabilities to the Member(s) and establish such Reserves as may be reasonably necessary to provide for contingent liabilities of the Company; and

(ii) distribute the remaining assets to the Member(s), such distribution to be made either in cash or in kind, as determined by the Manager (or the Representative).

(b) Upon completion of the winding up, liquidation and distribution of the assets, the Company shall be deemed terminated.

9.03 Articles of Dissolution. When all debts, liabilities and obligations of the Company have been paid and discharged or adequate provisions have been made therefor and all of the remaining property and assets of the Company have been distributed, articles of dissolution, as required by the Limited Liability Company Law, shall be executed and filed with the Massachusetts Secretary of the Commonwealth.

9.04 Effect of Filing of Articles of Dissolution. Upon the filing of articles of dissolution with the Massachusetts Secretary of the Commonwealth, the existence of the Company shall cease, except for the purpose of suits, other proceedings and appropriate action as provided in the Limited Liability Company Law. The Manager (or the Representative) shall have authority to distribute any Company property discovered after dissolution, convey real estate and take such other action as may be necessary on behalf of and in the name of the Company.

ARTICLE X
MISCELLANEOUS PROVISIONS

10.01 Choice of Law. This Operating Agreement, and its interpretation, shall be governed exclusively by its terms and by the laws of the State of Massachusetts (other than its conflicts of laws rules) and specifically the Limited Liability Company Law.

10.02 Amendments. This Operating Agreement may not be amended except in writing signed by the Member(s).

10.03 Headings. The headings in this Operating Agreement are inserted for convenience only and are in no way intended to describe, interpret, define, or limit the scope, extent or intent of this Operating Agreement or any provision hereof.

10.04 Severability. If any provision of this Operating Agreement or the application thereof to any Person or circumstance shall be invalid, illegal or unenforceable to any extent, the remainder of this Operating Agreement and the application thereof shall not be affected and shall be enforceable to the fullest extent permitted by law.

10.05 Construction. Words of any gender or of neutral gender, plural, or singular used in this Operating Agreement shall be construed to include the feminine, masculine, or be gender neutral, singular, or plural as the context may require

10.06 Heirs, Successors and Assigns. Each and all of the covenants, terms, provisions and agreements herein contained shall be binding upon and inure to the benefit of the parties hereto and their respective heirs, legal representatives, successors and assigns.

10.07 Creditors. None of the provisions of this Operating Agreement shall be for the benefit of or enforceable by any creditors of the Company or of the Member(s).

[Signature Page Follows]

IN WITNESS WHEREOF, the parties have executed this Operating Agreement on the date first written above.

THE COMPANY:

By: _____
Name: Scot Trifilo
Title: Manager

INITIAL MEMBER AND MANAGER:

_____
Scot Trifilo

EXHIBIT A
MEMBERS AND MEMBERSHIP INTERESTS

Name and Address	Percentage of Membership Interest
Scot Trifilo 54 Nelson Ave. Ext. Saratoga Springs, New York 12866	100%

Commonwealth of Massachusetts
Department of Revenue
Kevin W. Brown, Acting Commissioner

mass.gov/dor

Letter ID: L0988668480
Notice Date: March 23, 2020
Case ID: 0-000-943-106

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE

TEN - TEN LLC
54 NELSON AVE EXT
SARATOGA SPRINGS NY 12866-8764

Why did I receive this notice?

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

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

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

What if I have questions?

If you have questions, call us at (617) 887-6400 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

Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

Department of Unemployment Assistance Attestation

I, **Scot Trifilo**, attest as an authorized representative of **TEN-TEN LLC** that the applicant has complied with the requirements of 935CMR 500.101(1), (as required for all applications submitted on or after November 1, 2019) and attempted to obtain a letter of Good Standing from the Massachusetts Department of Unemployment Assistance, but has been unable to do so for the following reasons:

1. TEN-TEN does not currently have any employees;
2. TEN-TEN attempted to create an account with a future hire date for employees, but was unable to do so;
3. TEN-TEN will register and provide to the CCC a Certificate of Good Standing from the Massachusetts Department of Unemployment Assistance, upon hiring of employees.

Date: 3-20-20

Signature of Attester: Scot Trifilo

The Commonwealth of Massachusetts

Secretary of the Commonwealth

State House, Boston, Massachusetts 02133

William Francis Galvin
Secretary of the
Commonwealth

November 21, 2019

TO WHOM IT MAY CONCERN:

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

TEN-TEN LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **September 21, 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; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; 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: **SCOT TRIFILO**

I further certify, the names of all persons authorized to execute documents filed with this office and listed in the most recent filing are: **SCOT TRIFILO**

The names of all persons authorized to act with respect to real property listed in the most recent filing are: **SCOT TRIFILO**

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

Processed By:BOD

Plan for Obtaining Liability Insurance

Ten-Ten, LLC. ("10-10") plans to contract with Cannasure Insurance Services to maintain general liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate annually and product liability coverage for no less than $1,000,000 per occurrence & $2,000,000 in aggregate annually. The policy deductible will be no higher than $5,000 per occurrence. 10-10 will consider additional coverage based on availability & cost-benefit analysis. If adequate coverage is unavailable at a reasonable rate, 10-10 will place in escrow at least $250,000 to be expended for liabilities coverage. Any withdrawal from such escrow replenished within 10 business days. 10-10 will keep reports documenting compliance with 935 CMR 500.105(10).

TEN-TEN, LLC

BUSINESS PLAN

OVERVIEW

On November 8, 2016, Massachusetts voters approved, effective January 1, 2018, the sale of cannabis and cannabis products to adults 21 years of age and older.

TEN-TEN LLC ("TEN-TEN") has applied for an indoor Marijuana Cultivation Establishment license, an outdoor Marijuana Cultivation Establishment license, a Marijuana Retail Establishment license and Marijuana Product Manufacturing Establishment license. TEN-TEN's application for these licenses is pending before the Massachusetts Cannabis Control Commission ("CCC").

TEN-TEN is a true, end to end, craft cannabis business, with all facilities collocated at 775 Main Street, Sheffield, Massachusetts ("the property").

TEN-TEN's objective is to maximize the available indoor and outdoor cultivation, production, and retail space at the property to grow, produce, and sell, cannabis and cannabis products wholesale, and direct-to-consumer at retail, to meet the burgeoning wholesale and retail demand for legal cannabis and cannabis products.

CULTIVATION, PRODUCTION AND RETAIL SALES FACILITY – SHEFFIELD, MA

TEN-TEN has entered into a Host Community Agreement ("HCA") with the Town of Sheffield, Massachusetts, and, acquired the property.

The property currently consists of 2.23 acres of land containing a 4,600 sq.ft. building, which includes retail spaces, and is commercially zoned, which allows this property to be used for: indoor and outdoor cannabis cultivation, production of cannabis and cannabis products, and retail and wholesale sale of cannabis and cannabis products.

The property is located directly on US-7, with a traffic count of over 10,000 cars daily. Sheffield is 6 miles from Great Barrington (pop. 6,900), a major tourist destination, 16 miles on US-7 from the Mass Pike, the main east-west route through Massachusetts, and 26 miles on US-7 from the City of Pittsfield (pop. 42,600), also a major tourism destination and the center of commerce in Berkshire County (pop. 126,000). The property has its own entrance directly off of US-7, and supports ample parking.

Upon approval of TEN-TEN's Provisional Licenses, TEN-TEN will initiate a conversion of the existing building to an indoor growth facility, retaining space for future retail sales, and a multi-phase development of the property, including the construction of a two-story, 16,800 sq.ft. indoor facility containing ten flower rooms and additional manufacturing and retail space, adjacent to and connected to the existing building, as well as the development of an outdoor cultivation facility, all of which will be dependent on market conditions and demand.

Upon completion of TEN-TEN's purpose-built indoor cannabis cultivation facility, TEN-TEN will have approximately a 12,480 sq.ft. indoor canopy.

If and when TEN-TEN seeks to expand its indoor cultivation canopy, applies, and is approved to do so, the property provides sufficient space to allow TEN-TEN to further expand its indoor cultivation facility, adjacent to its existing and planned facilities.

TEN-TEN's facilities and buildings will be retrofitted and/or designed to comply with all current State and Local statutes, regulations, and codes, as well as with CCC regulations. This will involve significant expenditures for facility and property lighting, security systems and monitoring, as well as Information Technology (IT) and seed-to-sale tracking software.

In the event that TEN-TEN's Provisional Licenses are not approved concurrently, TEN-TEN will adjust their multi-phase development plan to take into account the Provisional License approvals.

COMPETITIVE ADVANTAGES

TEN-TEN'S location in Sheffield provides significant competitive advantages vs. TEN-TEN's competitors in Great Barrington, Lee, Lenox and Pittsfield:

> TEN-TEN, through its principal, owns rather than rents its facilities, providing lower costs and allowing TEN-TEN control of its costs;
>
> TEN-TEN has the ability to expand using its existing property;
>
> TEN-TEN's indoor cultivation facility will be purpose-built for cannabis cultivation, rather than retrofitted using an existing structure, providing economies of scale not achievable in a retrofitted structure; and
>
> TEN-TEN's colocation of indoor and outdoor cultivation of cannabis, production of cannabis and cannabis products, and retail and wholesale sales on one site, provides significant economies of scale in security and transportation costs.

TEN-TEN's principal has a lifetime of horticultural experience, and years of legal cannabis cultivation experience.

WHOLESALE PRODUCTION AND REVENUE ESTIMATES

Initially, TEN-TEN plans to target wholesale sales of cannabis and cannabis products from its purpose-built facility.

TEN-TEN's purpose-built facility will allow TEN-TEN to operate ten, independent flower rooms, each producing approximately 448 lbs. of cannabis annually, using a conservative estimate of four crops per year.

Of those estimated 448 lbs., 85%, or 380 lbs., will be flower, and the balance of 68 lbs. will be trim, which will be used for pre-rolled cannabis joints.

The wholesale price of flower varies widely, based on supply and demand. Using a price range of $3,000.00 - $4,800.00 per pound, each flower room provides estimated potential wholesale flower revenue of $1,140,000.00 - $1,824,000.00 annually, using a conservative estimate of four crops per year.

The wholesale price of pre-rolled cannabis joints is conservatively estimated at $3,600.00 per pound, but may vary, based on supply and demand. Each flower room produces an estimated 68 lbs. of trim, so each flower room provides an estimated potential wholesale pre-roll revenue of $244,800.00, using a conservative estimate of four crops per year.

Therefore, each flower room produces estimated potential annual wholesale revenue of $1,384,800.00 - $2,068,800.00, and with all ten flower rooms in cultivation, estimated potential annual wholesale revenue, using a conservative estimate of four crops per year, is $13,848,000.00 – $20,688,000.00, depending on the wholesale price per pound of pre-rolled joints and flower. The wholesale price of flower varies widely, based on supply and demand. The wholesale price of pre-rolled joints may vary, based on supply and demand.

PLEASE REFER TO TEN-TEN's APPLICATION FOR LICENSURE FOR:

TEN-TEN's plans for obtaining cannabis and/or cannabis products.

TEN-TEN's plan for restricting access to adults 21 years of age and older.

TEN-TEN's security plan.

TEN-TEN's plan for prevention of diversion.

TEN-TEN's plan for storage of cannabis and cannabis products.

TEN-TEN's plan for transportation of cannabis and cannabis products.

TEN-TEN's inventory control plan.

TEN-TEN's quality control and testing plan.

TEN-TEN's plan for retail and wholesale sales.

TEN-TEN's personnel policies, including background checks, qualifications and training.

TEN-TEN's recordkeeping procedures.

TEN-TEN's policies for maintenance of financial records.

TEN-TEN's diversity plan.

The types of products TEN-TEN intends to manufacture and methods of production.

TEN-TEN's policies and procedures for cultivation.

TEN-TEN's unique identifying marks used for branding.

TEN-TEN's positive impact plan.

TEN-TEN, LLC

BUSINESS PLAN

RENEWAL 7-27-21

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TEN-TEN’s unique identifying marks used for branding.

TEN-TEN’s positive impact plan.

ADDENDUM: This plan will be updated to reflect the most recent changes to 935 CMR 500 et.al. Regulations in effect at the time of Ten-Ten's request for Post Provisional License Inspection

RENEWAL 7-27-21
Plan for Obtaining Liability Insurance

TEN-TEN, LLC. ("TEN-TEN") plans to contract with Cannasure Insurance Services to maintain general liability insurance coverage for no less than $1,000,000 per occurrence and $2,000,000 in aggregate annually and product liability coverage for no less than $1,000,000 per occurrence & $2,000,000 in aggregate annually. The policy deductible will be no higher than $5,000 per occurrence. 10-10 will consider additional coverage based on availability & cost-benefit analysis. If adequate coverage is unavailable at a reasonable rate, 10-10 will place in escrow at least $250,000 to be expended for liabilities coverage. Any withdrawal from such escrow replenished within 10 business days. Ten-Ten will keep reports documenting compliance with 935 CMR 500.105(10).

TEN-TEN's Plan for Separating Recreational from Medical Operations

TEN-TEN LLC is not applying for a medical license under 935 CMR 501.101. As a result, TEN-TEN LLC will not be a Medical Marijuana Treatment Center or selling medical marijuana. TEN-TEN LLC is ONLY applying for Recreational Retail Marijuana Establishment Licensure.

TEN-TEN's Marijuana and Marijuana Product Quality Control Processes, Product Safety Plans, and Testing Procedures

TEN-TEN LLC ("TEN-TEN") has developed marijuana and marijuana product quality control processes, product safety plans and testing procedures to ensure that TEN-TEN is compliant with all regulatory and legal requirements, including, but not limited to 935 CMR 500.101(1)(c), sanitary practices in compliance with 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements, 105 CMR 590.000: State Sanitary Code Chapter X – Minimum Sanitation Standards for Food Establishments, 310 CMR 7.00: Air Pollution Control, M.G.L. c. 94G, § 4(a½)(xxvi), 935 CMR 500.105, 935 CMR 500.130, 935 CMR 500.160, and 21 CFR 1.908(c) and that protect the safety of our customers, our surrounding community and our employees.

Pursuant to 935 CMR 500.105(3), TEN-TEN has developed the following requirements for the handling of marijuana:

TEN-TEN shall process marijuana in a safe and sanitary manner. TEN-TEN shall process the leaves and flowers of the female marijuana plant only, which shall be:

1. Well cured and free of seeds and stems;
2. Free of dirt, sand, debris, and other foreign matter;
3. Free of contamination by mold, rot, other fungus, pests and bacterial diseases and satisfying the sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food, and if applicable, 105 CMR 590.000: State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments;
4. Prepared and handled on food-grade stainless steel tables with no contact with bare hands; and
5. Packaged in a secure area.

TEN-TEN shall also comply with the following sanitary requirements:

1. Any marijuana establishment agent whose job includes contact with marijuana or non-edible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements;
2. Any marijuana establishment agent working in direct contact with preparation of marijuana or non-edible marijuana products shall conform to sanitary practices while on duty, including:
    a. Maintaining adequate personal cleanliness; and
    b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. Hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in TEN-TEN's

production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;

4. There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Litter and waste shall be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
7. There shall be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
9. All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items shall not be stored in an area containing products used in the cultivation of marijuana. The Commission may require TEN-TEN to demonstrate the intended and actual use of any toxic items found on the premises;
11. TEN-TEN's public water supply shall be sufficient for necessary operations;
12. Plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout TEN-TEN's facilities. TEN-TEN's plumbing shall properly convey sewage and liquid disposable waste. There shall be no cross-connections between the potable and wastewater lines;
13. TEN-TEN shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. Products that can support the rapid growth of undesirable microorganisms shall be stored in a manner that prevents the growth of these microorganisms;
15. Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers; and
16. All vehicles and transportation equipment used in the transportation of marijuana and marijuana products or edibles requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the

marijuana, marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

In addition to the general operational requirements for TEN-TEN required under 935 CMR 500.105, pursuant to 935 CMR 500.130, TEN-TEN has developed the following additional requirements for the handling of marijuana products:

1. TEN-TEN's production of edible marijuana products shall take place in compliance with the following:
    a. All edible marijuana products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments, and with the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements; and
    b. Any Marijuana Product that is made to resemble a typical food or beverage product must be packaged and labelled as required by 935 CMR 500.105(5) and (6).
2. TEN-TEN shall meet all applicable environmental laws, regulations, permits and other applicable approvals including, but not limited to, those related to water quality and quantity, wastewater, solid and hazardous waste management and air pollution control, including prevention of odor and noise pursuant to 310 CMR 7.00: Air Pollution Control, and use additional best management practices as determined by the Commission in consultation with the working group established under St. 2017, c. 55, § 78(b) or applicable departments or divisions of the EOEEA to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts.
3. TEN-TEN, when selling or otherwise transferring marijuana and marijuana products to another marijuana establishment, shall provide documentation of its compliance, or lack thereof, with the testing requirements of 935 CMR 500.160, and the standards established by the Commission for the conditions, including time and temperature controls, necessary to protect marijuana and marijuana products against physical, chemical, and microbial contamination, as well as against deterioration of finished products during storage and transportation.
4. In addition to the written operating policies required under 935 CMR 500.105(1), TEN-TEN shall maintain written policies and procedures for the production and/or distribution of marijuana and marijuana products, as applicable, which shall include, but not be limited to:
    a. Methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(8);
    b. Policies and procedures for handling voluntary and mandatory recalls of marijuana and/or marijuana products. Such procedures shall be adequate to deal with recalls due

to any action initiated at the request or order of the Commission, and any voluntary action by TEN-TEN to remove defective or potentially defective marijuana and/or marijuana products from the market, as well as any action undertaken to promote public health and safety;

c. Policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana and/or marijuana products are segregated from other product and destroyed. Such procedures shall provide for written documentation of the disposition of the marijuana and/or marijuana products. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(12);

d. Policies and procedures for transportation. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(13);

e. Policies and procedures to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(15);

f. Policies and procedures for the transfer, acquisition, or sale of marijuana and/or marijuana products between marijuana establishments;

g. Policies and procedures to ensure that all edible marijuana products are prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments, and with the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements; and

h. Policies and procedures for maintaining a product catalog identifying all types of marijuana products actively manufactured at the facility. The catalog shall include a description of the product, photograph or illustration, packaging design, and dosage amounts, including expected cannabinoid profile.

5. Notwithstanding a stricter municipal or state regulation, TEN-TEN shall identify the method of extraction (e.g., Butane, Propane, CO2) on a physical posting at all entrances. The posting shall be a minimum of 12" x 12" and identify the method of extraction in lettering no smaller than one inch in height. TEN-TEN shall also post a copy of a permit to keep, store, handle or otherwise use flammable and combustible gasses at each place of keeping, storing, handling or using such gasses within the facility.

6. Production of edible marijuana products shall take place in compliance with the following:

   a. Any edible marijuana product that is made to resemble a typical food or beverage product must be packaged and labeled as required by M.G.L. c. 94G, § 4(a½)(xxvi), and 935 CMR 500.105(5) and (6).

   b. The manufacture or sale of edibles in the following shapes and types is prohibited:

      1. The distinct shape of a human, animal, or fruit; or

2. A shape that bears the likeness or contains characteristics of a realistic or fictional human, animal, or fruit, including artistic, caricature, or cartoon renderings.

c. Edible marijuana products that are geometric shapes and simply fruit-flavored are not considered fruit and are permissible.

7. Sanitary Requirements: All edible marijuana products shall be prepared, handled, and stored in compliance with the requirements in 935 CMR 500.105(3) and 935 CMR 500.105(11).
8. Additional labeling and packaging requirements for edible marijuana products:
   a. In addition to the requirements set forth in M.G.L. c. 94G, § 4(a½)(xxvi), and 935 CMR 500.105(5) and (6), TEN-TEN shall ensure that the following information or statement is affixed to every container holding an edible earijuana product:
      1. If the retail edible marijuana product is perishable or time and temperature controlled, a statement that the edible marijuana product must be refrigerated.
      2. The date on which the edible marijuana product was produced.
      3. A nutritional fact panel that must be based on the number of THC servings within the container.
      4. Information regarding the size of each serving for the product by milligrams, the total number of servings of marijuana in the product, and the total amount of active THC in the product by milligrams (mgs). For example: "The serving size of active THC in this product is X mg(s), this product contains Y servings of marijuana, and the total amount of active THC in this product is (X*Y) mg(s)."
      5. A warning that the impairment effects of edible marijuana may be delayed by two hours or more.
9. Once a label with a use-by date has been affixed to a container holding an edible marijuana product, TEN-TEN shall not alter that date or affix a new label with a later use-by date.
10. TEN-TEN shall ensure that each single serving of an edible marijuana product is physically marked in a way that enables a reasonable person to intuitively determine how much of the product constitutes a single serving of active THC.
11. Each serving of an edible marijuana product within a multi-serving package of edible marijuana products must be easily separable, in order to allow an average person twenty-one (21) years of age or older to physically separate, with minimal effort, individual servings of the product.
12. Each single serving of an edible marijuana product contained in a packaged unit of multiple edible marijuana product shall be marked, stamped, or otherwise imprinted with a symbol or easily recognizable mark issued by the Commission that indicates the package contains

marijuana product.

13. TEN-TEN shall not prepare or deliver, sell or otherwise distribute an edible marijuana product with potency levels exceeding the following, as tested by an independent marijuana testing facility licensed in accordance with M.G.L. c. 94G, § 15:
    a. For a single serving of an edible marijuana product, five milligrams (5.00 mg) of active tetrahydrocannabinol (THC);
    b. In a single package of multiple edible marijuana product to be eaten, swallowed, or otherwise ingested, not more than twenty (20) servings or one hundred (100) milligrams (100.00 mg) of active THC; and
    c. The THC content must be homogenous, or evenly distributed throughout the edible marijuana product. A retail marijuana product shall be considered to not be homogenous if ten percent (10%) of the infused portion of the marijuana product contains more than twenty (20%) of the total THC contained within entire marijuana product.

Quality Control

TEN-TEN shall comply with the following sanitary requirements:

1. Any TEN-TEN agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 500.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any TEN-TEN agent working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including:
    a. Maintaining adequate personal cleanliness; and
    b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. TEN-TEN's hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in TEN-TEN's production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. TEN-TEN's facility shall have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. TEN-TEN shall ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);

6. TEN-TEN's floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
7. TEN-TEN's facility shall have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. TEN-TEN's buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
9. TEN-TEN shall ensure that all contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;
11. TEN-TEN shall ensure that its water supply is sufficient for necessary operations, and that such water supply is safe and potable;
12. TEN-TEN's plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing shall properly convey sewage and liquid disposable waste from the marijuana establishment. There shall be no cross-connections between the potable and waste water lines;
13. TEN-TEN shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. TEN-TEN shall hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. TEN-TEN shall store and transport finished products under conditions that shall protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

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

TEN-TEN shall ensure that TEN-TEN's facility is always maintained in a sanitary fashion and shall comply with all applicable sanitary requirements.

TEN-TEN shall follow established policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures are sufficient to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by TEN-TEN to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.
Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated shall be disposed of in accordance with the provisions of 935 CMR 500.105(12), and any such waste shall be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

TEN-TEN shall process marijuana in a safe and sanitary manner. TEN-TEN shall process the leaves and flowers of the female marijuana plant only, which shall be:

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

All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments.

Testing

In compliance with 935 CMR 500.160(1), TEN-TEN shall not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as otherwise allowed under 935 CMR 500.000: Adult Use of Marijuana.

Pursuant to 935 CMR 500.160(1) testing of TEN-TEN's Marijuana Products shall be performed by an Independent Testing Laboratory in compliance with protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission including, but not limited to, the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products.

Pursuant to 935 CMR 500.160(1), testing of environmental media (e.g., soils, solid growing media, and water) shall be performed in compliance with the Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries published by the Commission.

Pursuant to 935 CMR 500.160(2), TEN-TEN's marijuana shall be tested for the cannabinoid profile and for contaminants, as specified by the Commission, including, but not limited to, mold, mildew, heavy

metals, plant growth regulators, and the presence of pesticides. The Commission may require additional testing.

Pursuant to 935 CMR 500.160(3), TEN-TEN has a written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1).

Pursuant to 935 CMR 500.160(3)(a), TEN-TEN's policy includes, but is not limited to:

1. notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch.
2. notifying the Commission of any information regarding contamination as specified by the Commission or immediately upon request by the Commission.

Pursuant to 935 CMR 500.160(3)(b), TEN-TEN's policy requires the notification referred to above be from both TEN-TEN and the Independent Testing Laboratory, separately and directly.

Pursuant to 935 CMR 500.160(3)(c), TEN-TEN's policy requires the notification from TEN-TEN describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

Pursuant to 935 CMR 500.160(4), TEN-TEN shall maintain the results of all testing for no less than one year. Testing results shall be valid for a period of one year. Marijuana or marijuana products with testing dates in excess of one year old shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

Pursuant to 935 CMR 500.160(5), seeds sold by TEN-TEN is not subject to the above testing provisions.

Pursuant to 935 CMR 500.160(6), clones are subject to these testing provisions, but are exempt from testing for metals.

Pursuant to 935 CMR 500.160(7), all transportation of marijuana and marijuana products to and from Independent Testing Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13).

Pursuant to 935 CMR 500.160(8), any excess marijuana and/or marijuana products shall be disposed in compliance with 935 CMR 500.105(12), either by the independent testing laboratory returning the

excess marijuana and/or marijuana products to TEN-TEN for disposal, or by the independent testing laboratory disposing of it directly.

Quality Control Standard Operating Procedures

TEN-TEN shall implement standard operating procedures (SOPs) relating to quality control processes to ensure product quality and safety. Once TEN-TEN's volume justifies the appointment of a Quality Assurance Manager, TEN-TEN shall appoint same, who shall be responsible for the development, implementation, oversight and updating, as necessary, of TEN-TEN's quality control processes.

In the interim, TEN-TEN's owner, Scot Trifilo, shall personally oversee TEN-TEN's on-site quality control processes, with the assistance of TEN-TEN's off-site independent testing laboratory. TEN-TEN's quality control and product safety processes shall incorporate employee, community, and customer product quality and safety considerations and shall require strict adherence in TEN-TEN's daily activities.

TEN-TEN's extensive quality control processes address a myriad of product safety requirements including, but not limited to, employee training requirements, proper equipment usage and equipment maintenance protocols, sanitation standards, cultivation protocols, component and product handling and storage, quality control testing, child-resistant packaging, product inserts, label disclosures and product traceability requirements.

TEN-TEN's SOPs shall be updated as often as necessary to ensure compliance with the laws and regulations that govern TEN-TEN. TEN-TEN's owner, Scot Trifilo, or his designate, with the support and input of his managers, shall be personally responsible for updating TEN-TEN's SOPs to incorporate any additions or amendments to the laws and regulations affecting TEN-TEN, as well as incorporating any guidance or directives published by regulatory agencies as they apply to TEN-TEN.

All employees shall be required to have proper training on the SOPs applicable to their duties. Each employee shall be required to demonstrate their understanding of the critical processes which apply to their duties and responsibilities. Additionally, all third-party contractors shall be required, by contract, to perform their duties in compliance with TEN-TEN's policies and procedures and regulatory agency regulations.

Any employee or contractor who fails to perform their duties in compliance with TEN-TEN's policies and procedures and regulatory agency regulations shall be reprimanded and/or terminated, depending on

the severity of the offense. All employees and contractors shall be required, as a condition of employment and/or contract, to report any observed compliance issues to the appropriate TEN-TEN manager.

TEN-TEN's Recordkeeping Policies and Procedures

General Overview

TEN-TEN LLC ("TEN-TEN") has established policies and procedures regarding recordkeeping and record retention in order to ensure the maintenance, safekeeping, and accessibility of critical documents. Written records shall be stored in a locked room designated for record retention. Electronic records shall be stored on the TEN-TEN server, in on-site and off-site backup, and in the cloud, as necessary. All written and electronic records shall be available for inspection by the Commission upon request.

Recordkeeping in compliance with 935 CMR 500.105(9):

Written records that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the records identified below.

To ensure that TEN-TEN maintains and retains all records as required by this policy, a review by management of Corporate Records, Business Records, Personnel Records, and Financial Records to ensure completeness, accuracy, and timeliness of said records shall occur quarterly. Financial recordkeeping is addressed in a separate section of the Management and Operations Profile.

In addition, TEN-TEN's operating policies and procedures shall be updated, as needed, on an ongoing basis, and undergo a review by management on an annual basis. Updated policies and procedures shall be provided to the Commission pursuant to 935 CMR 500.104(2).

TEN-TEN's records include, but are not limited to:

- Corporate Records, which are those records may require, at a minimum, annual reviews, updates, and renewals, including but not limited to:
    - Insurance:
        - Directors & Officers Policies
        - Product Liability Policies
        - General Liability Policies
        - Umbrella Policies
        - Workers Compensation Policies
        - Employer Professional Liability Policies
        - Motor Vehicle Policies
        - All other policies, as necessary
        - Certificates of insurance naming TEN-TEN as an additional insured
    - Third-Party Testing Laboratory Contracts

    - Contracts for the Purchase and/or Sale of Marijuana and Marijuana Products
    - Transportation Contracts
    - All other contracts
    - Commission Requirements:
        - Annual Agent Registration
        - Annual Marijuana Establishment Registration
        - Policies and Procedures
    - Local Compliance:
        - Host Community Agreements
        - Certificates of Occupancy
        - Special Permits
        - Variances
        - Site Plan Approvals
        - As-Built Drawings
    - Corporate Governance:
        - Annual Reports
        - Secretary of State Filings

- Business Records in compliance with 935 CMR 500.105(9)(e), including but not limited to, written and/or electronic 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 wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment.

- Personnel Records in compliance with 935 CMR 500.105(9)(d), including but not limited to, written and/or electronic records of:
    - Job descriptions for each agent, as well as organizational charts consistent with the job descriptions;
    - Personnel records for each marijuana establishment agent. Such records shall be maintained for at least twelve (12) months after termination of the agent's affiliation with TEN-TEN 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; and
        - Notice of completed responsible vendor and eight-hour related duty training.
    - A staffing plan that demonstrates accessible business hours and safe cultivation conditions;
    - Personnel policies and procedures; and
    - All background check reports obtained in accordance with M.G.L c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: Criminal Offender Record Information (CORI).

- Records of Testing of marijuana and marijuana products in compliance with 935 CMR 500.160(3).

- Inventory Records in compliance with 935 CMR 500.105(8)(b), including but not limited to:
    - Real-time inventory 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 in-progress and finished marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
    - 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 agents who conducted the inventory.

- Seed-to-Sale Tracking Records in compliance with 935 CMR 500.105(9)(c) and as required by 935 CMR 500.105(8)(e).

- Incident Reporting Records in compliance with 935 CMR 500.110(9), including, but not limited to:

    - Written notice provided to the Commission by TEN-TEN within ten (10) calendar days of any incident described in 935 CMR 500.110(9)(a), by an incident report, in the form and manner prescribed by the Commission, which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified.
    - All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) shall be maintained by TEN-TEN for not less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within their lawful jurisdiction on request.

- Waste Disposal Records in compliance with 935 CMR 500.105(9)(f) & in compliance with 935 CMR 500.105(12)(d), including, but not limited to:
    - When marijuana, marijuana products or waste are disposed of or handled, TEN-TEN shall create and maintain an 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 TEN-TEN agents present during the disposal or handling, with their signatures. TEN-TEN shall keep these records for at least three (3) years. This period shall automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

- Security Records in compliance with 935 CMR 500.110, including, but not limited to:
    - 935 CMR 500.110(4)(e): All outside vendors, contractors and visitors shall obtain a visitor identification badge prior to entering a limited access area and shall be escorted at all times by a TEN-TEN agent authorized to enter the limited access area. All visitors must be logged in and out and that log shall be available for inspection by the Commission at all times.
    - 935 CMR 500.110(5)(a)(5): Recordings from all video cameras which shall be enabled to record 24 hours each day and be available for immediate viewing by the Commission on request for at least the preceding 90 calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer. Video cameras may use motion detection sensors to begin recording, so long as the motion detection sensor system provides an alert to designated employees of TEN-TEN in a manner established in TEN-TEN's written security procedures and approved by the Commission or a Commission Delegee. If a TEN-TEN receives notice that the motion

detection sensor is not working correctly, it must take prompt action to make corrections and document those actions. Recordings shall not be destroyed or altered, and shall be retained as long as necessary if TEN-TEN is aware of a pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.

- 935 CMR 500.110(5)(b) and 935 CMR 500.110(6)(b): All security system equipment and recordings shall be maintained in a secure location so as to prevent theft, loss, destruction and alterations.
- 935 CMR 500.110(5)(e) and 935 CMR 500.110(6)(d): A current list of authorized agents and service personnel that have access to the surveillance room shall be made available to the Commission upon request.
- 935 CMR 500.110(6)(a)(5): 24-hour recordings from all video cameras that are available for immediate viewing by the Commission on request and that are retained for at least ninety (90) calendar days. Recordings shall not be destroyed or altered, and shall be retained as long as necessary if TEN-TEN is aware of a pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.
- All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) shall be maintained by TEN-TEN for not less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within their lawful jurisdiction on request.

- Transportation Records in compliance with 935 CMR 500.105(13), including, but not limited to:
  - 935 CMR 500.105(13)(a)(11): In the case of an emergency stop during the transportation of marijuana and marijuana products, a log must be maintained describing the reason for the stop, the duration, the location, and any activities of personnel exiting the vehicle.
  - 935 CMR 500.105(13)(b)(1): TEN-TEN agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than twenty-four (24) hours following the discovery of such a discrepancy.
  - 935 CMR 500.105(13)(b)(2): TEN-TEN agents shall report to the Commission and Law Enforcement Authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than twenty-four (24) hours following such accidents, diversions, losses, or other reportable incidents.

    - 935 CMR 500.105(13)(c)1: Records that a vehicle used for transporting marijuana and marijuana products is owned or leased by TEN-TEN and properly registered, inspected, and insured in the Commonwealth, which shall be made available to the Commission on request.
    - 935 CMR 500.105(13)(e)8: The originating location must have a Marijuana Establishment Agent assigned to monitoring the GPS unit and secure form of communication, who must log all official communications with TEN-TEN agents transporting marijuana products.
    - 935 CMR 500.105(13)(f)(5): TEN-TEN shall retain all transportation manifests for no less than one (1) year and make them available to the Commission upon request.

- Records of Responsible Vendor Training in compliance with 935 CMR 500.105(2)(b)5, including, but not limited to:
    - TEN-TEN shall maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.

- Records following closure, in compliance with 935 CMR 500.105(9)(g), including, but not limited to:
    - All records shall be kept for at least two (2) years at TEN-TEN's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, TEN-TEN shall communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.

- Written Operating Policies and Procedures in compliance with 935 CMR 500.105, including but not limited to:
    - Written Operating Procedures: TEN-TEN shall have and follow a set of detailed written operating procedures which shall be updated on an ongoing basis, as necessary and undergo a review by management on an annual basis.
    - Operating procedures shall include, but need not be limited to the following:
        - Security measures in compliance with 935 CMR 500.110;
        - Emergency policies and procedures for securing all product following any instance of diversion, theft or loss of marijuana and marijuana products, and conduct an assessment to determine

whether additional safeguards are necessary, in compliance with 935 CMR 500.110(1)(m);

- Employee security policies, including personal safety and crime prevention techniques;
- A description of TEN-TEN's hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement authorities on request, and updated pursuant to 935 CMR 500.000;
- Storage and waste disposal of marijuana and marijuana products in compliance with 935 CMR 500.105(11);
- Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
- Price lists for marijuana and marijuana products and any other available products;
- Procedures to ensure accurate recordkeeping, including inventory protocols for transfer and inventory in compliance with 935 CMR 500.105(8) and (9);
- Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- Alcohol, smoke, and drug-free workplace policies;
- A plan describing how confidential information and other records required to be maintained confidentially will be maintained;
- A policy for the immediate dismissal of any TEN-TEN agent or employee who has:
    - Diverted marijuana, which shall be reported to law enforcement authorities and to the Commission;
    - Engaged in unsafe practices with regard to TEN-TEN's operations, which shall be reported to the Commission; or
    - Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation in any other jurisdiction.
- Policies and procedures for the handling of cash on TEN-TEN's premises including, but not limited to, storage, collection

frequency, and transport to financial institution(s), to be available on inspection;

- Policies and procedures to prevent the diversion of marijuana and marijuana products to individuals younger than twenty-one (21) years old;
- 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;
  - 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;
  - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
  - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.

- An operational plan for the cultivation of marijuana, including a detailed summary of the policies and procedures for cultivation, consistent with state and local law including, but not limited to, the Commission's Guidance on Integrated Pest Management effective November 1, 2019.

- Written policies and procedures for the cultivation, production, transfer or distribution of marijuana and marijuana products, as applicable, which shall include but not be limited to:
  - Methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories.

The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(8);

- Policies and procedures for handling voluntary and mandatory recalls of marijuana and marijuana products. Such procedures shall be adequate to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by TEN-TEN to remove defective or potentially defective marijuana or marijuana products from the market, as well as any action undertaken to promote public health and safety;
- Policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana or marijuana product is segregated from other marijuana and marijuana products and destroyed. Such procedures shall provide for written documentation of the disposition of the marijuana and marijuana products. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(12).
- Policies and procedures for transportation. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(13);
- Policies and procedures to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(15).
- Policies and procedures for the transfer, acquisition, or sale of marijuana and marijuana products between Marijuana Establishments;
- Policies and procedures to ensure that all marijuana products are prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments, and with the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements; and
- Policies and procedures for maintaining a product catalogue identifying all types of marijuana products actively manufactured at the facility. The catalog shall include a description of the product, photograph or illustration, packaging design, and dosage amounts, including expected cannabinoid profile.

- Records related to Recording Sales, in compliance with 935 CMR 500.140(5)(d), 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements, including, but not limited to:
    - A retailer shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. A marijuana retailer shall maintain records that it has performed the monthly analysis and produce it on request to the Commission.

TEN-TEN's Maintenance of Financial Records

TEN-TEN LLC.'s ("TEN-TEN") operating policies and procedures ensure financial records are accurate and maintained in compliance with 935 CMR 500.105(9)(e). Financial records maintenance measures include policies and procedures requiring that:

- Confidential information shall be maintained in a secure location, kept separate from all other records, and shall not be disclosed without the written consent of the individual to whom the information applies, or as required under law, or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
    - Maintaining financial records in accordance with generally accepted accounting principles, consistently applied; and
    - Keeping written business records available for inspection by the Commission, on request, including but not limited to all records required in any section of 935 CMR 500.000, in addition to 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; and
        - Salary and wages paid to each employee and any executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over TEN-TEN.
- All sales recording requirements under 935 CMR 500.140(5) are followed, including:
    - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
    - Ensuring that sales data is not manipulated or altered;
    - Conducting a monthly analysis of TEN-TEN's equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data;
    - Maintaining records that TEN-TEN has performed the monthly analysis and produce them on request to the Commission;

    - If TEN-TEN determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:
        - TEN-TEN shall immediately disclose the information to the Commission;
        - TEN-TEN shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
        - TEN-TEN shall take such other action directed by the Commission to comply with 935 CMR 500.105.
    - Complying with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements;
    - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;
    - Allowing the Commission and the DOR to audit and examine the point-of-sale system used by TEN-TEN in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000.
- Additional written business records shall be kept, including, but not limited to, records of:
    - Compliance with liability insurance coverage under 935 CMR 500.105(10);
    - Compliance with surety bond or escrow requirements under 935 CMR 500.105(16);
    - Fees paid under 935 CMR 500.005 or under any other section of the Commission's regulations; and
    - Fines or penalties, if any, paid under 935 CMR 500.550 or under any other section of the Commission's regulations.

TEN-TEN's Qualifications and Intended Trainings for Owners, Managers and Marijuana Establishment Agents

Pursuant to 935 CMR 500.101(1)(c)9, TEN-TEN LLC ("TEN-TEN") provides below a detailed description of the minimum qualifications and intended training(s) for marijuana establishment agents who shall be employees.

Minimum Qualifications

Pursuant to 935 CMR 500.030(1), all employees of TEN-TEN shall:

(a) be 21 years of age or older;

(b) have not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of Other Jurisdictions; and

(c) be determined suitable for registration consistent with the provisions of 935 CMR 500.802.

Pursuant to 935 CMR 500.802, all employees of TEN-TEN shall meet the suitability standards for registration as a marijuana establishment agent for a marijuana retail establishment, as these are the most stringent suitability standards:

(1) In accordance with M.G.L. c. 94G, § 4(a½)(iii), the Commission has established qualifications for licensure and minimum standards for employment that are directly and demonstrably related to the operation of a marijuana establishment and similar to qualifications for licensure and employment standards in connection with alcoholic beverages as regulated under M.G.L. c. 138; provided, that a prior conviction solely for a marijuana-related offense or for a violation of M.G.L. c. 94C, § 34 shall not disqualify an individual or otherwise affect eligibility for employment or licensure in connection with a marijuana establishment, unless the offense involved the distribution of a controlled substance, including marijuana, to a minor.

(2) For purposes of determining suitability based on background checks in accordance with 935 CMR 500.030 and 935 CMR 500.101:

(a) All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of other jurisdictions.

(b) All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy and solicitation.

(c) 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 included in 935 CMR 500.801: Table B commence on the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look back period shall commence on release from incarceration.

(e) Unless otherwise specified in 935 CMR 500.801: Table B, a criminal condition, offense or violation 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. All suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, the Commission shall:

1. Consider whether offense(s) or information that would result in a presumptive negative suitability determination under 935 CMR 500.801: Table B renders the subject unsuitable for registration; and
2. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 803 CMR 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS.

(3) 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 500.801: Table B within ten (10) days of such individual's arrest or summons, and within ten (10) days of the disposition on the merits of the underlying charge. Failure to make proper notification to the Commission may be grounds for disciplinary action. If the Commission lawfully finds a disqualifying event and the individual asserts that the record was sealed, the Commission may require the individual to provide proof from a court evidencing the sealing of the case.

Table B: Retail, Delivery-only Licensee or a Marijuana Establishment with a Delivery Endorsement, Social Consumption Establishment, and Transporter Marijuana Establishment Agents. Shall apply solely to applicants for registration as a Marijuana Establishment Agent at a Marijuana Establishment licensed pursuant to 935 CMR 500.100, as a Marijuana Retailer, Delivery-only Licensee or a Marijuana Establishment with a Delivery Endorsement, Social Consumption Establishment, or as a Marijuana Transporter, under 935 CMR 500.050.

Time Period	Precipitating Issue	Result
Present (during time from start of application process through action on application or renewal.)	**Open/Unresolved Criminal Proceedings:** Any outstanding or unresolved criminal proceeding, the disposition of which may result in a felony conviction under the laws of the Commonwealth or Other Jurisdictions, but excluding any criminal proceeding based solely on a Marijuana-related offense or a violation of M.G.L. c. 94C, § 32E(a) or § 34.	Presumptive Negative Suitability Determination
Present	**Open Professional or Occupational License Cases**	Presumptive Negative Suitability Determination
Present	**Open/Unresolved Marijuana License or Registration Violations (Massachusetts or Other Jurisdictions):** An outstanding or unresolved violation of the regulations as included in 935 CMR 500.000 or a similar statute or regulations of an Other Jurisdiction, which has either (a) remained unresolved for a period of six months or more; or (b) the nature of which would result in a determination of unsuitability for registration.	Presumptive Negative Suitability Determination
	Submission of Untruthful Information to the Commission Including, but Not Limited to: Submission of information in connection with an agent application, waiver request or other Commission action that is deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly, or by omission or ambiguity; or making statements during or in connection with a Commission inspection or investigation that are deceptive, misleading, false or fraudulent, or that tend to deceive or create a misleading impression, whether directly, or by omission or ambiguity.	Presumptive Negative Suitability Determination

Time Period	Precipitating Issue	Result
Indefinite	**Sex Offense:** Felony conviction for a "sex offense" as defined in M.G.L. c. 6, § 178C and M.G. L. c. 127, § 133E or like offenses in Other Jurisdictions.	Mandatory Disqualification
Indefinite	**Felony Convictions in Massachusetts or Other Jurisdictions:** For trafficking crimes under M.G.L. c. 94C, § 32E, or like crimes in Other Jurisdictions, except convictions for solely Marijuana-related crimes under M.G.L. c. 94C, § 32E (a), or like crimes in Other Jurisdictions.	Mandatory Disqualification
Indefinite	**Conviction or Continuance without a Finding (CWOF) for Any Distribution of a Controlled Substance to a Minor**	Mandatory Disqualification
Indefinite	**Failure to Register as a Sex Offender in Any Jurisdiction**	Mandatory Disqualification
Preceding Five Years	**Crimes of Domestic Violence Including, but Not Limited to**: Violation of an abuse prevention restraining order under M.G.L. c. 209A; and Violation of a harassment prevention order under M.G.L. c. 258E.	Presumptive Negative Suitability Determination
Indefinite	**(For Agents Working for a Transporter and Delivery-only)** Licensee or a Marijuana Establishment with a Delivery **Endorsement Multiple Crimes of Operating under the Influence:** Two offenses within a ten-year period; or three or more offenses within any period of time.	Presumptive Negative Suitability Determination

Time Period	Precipitating Issue	Result
Preceding Five Years	**Felony Convictions in Massachusetts or Other Jurisdictions**: For crimes of violence against a person or crimes of dishonesty or fraud, "violent crime" to be defined the same way as under M.G.L. c. 140, § 121 and M.G.L. c. 127, § 133E.	Mandatory Disqualification
Preceding Five Years	The applicant's or Licensee's prior actions posed or would likely pose a risk to the public health, safety, or welfare; and the risk posed by the applicant's or Licensee's actions relates or would likely relate to the operation of a Marijuana Establishment.	May make a Negative Suitability Determination in accordance with 935 CMR 500.800(8)

If TEN-TEN determines that one of TEN-TEN's registered marijuana agents has not properly notified the Commission in accordance with 935 CMR 500.802(3), or has otherwise become unsuitable for registration as a retail marijuana establishment agent and/or employment as a marijuana establishment agent, TEN-TEN shall immediately terminate the marijuana establishment agent's employment and shall notify the Commission within one (1) business day that the marijuana establishment agent is no longer suitable for registration as a retail marijuana establishment agent and no longer associated with TEN-TEN.

Training

As required by 935 CMR 500.105(2)(a), TEN-TEN shall ensure that all of TEN-TEN's agents has successfully completed a comprehensive training program that is tailored to the roles and responsibilities of their job, prior to performing their job functions, including, but not limited to the Responsible Vendor Training Program. Agents responsible for tracking and entering product into the Seed-to-sale SOR must receive training in a form and manner determined by the Commission. At a minimum, TEN-TEN staff shall receive eight hours of on-going training annually.

In compliance with 935 CMR 500.105(2)(b)(1), at the time of licensure, all of TEN-TEN's current owners, managers, and employees shall have attended and successfully completed a Responsible Vendor Training Program operated by an education provider accredited by the Commission to provide the annual minimum of two hours of Responsible Vendor Training to marijuana establishment agents.

In compliance with 935 CMR 500.105(2)(b)(2), TEN-TEN's new owners, managers, and non-administrative employees shall complete the Responsible Vendor Training Program within ninety (90) days of the date they are hired.

In compliance with 935 CMR 500.105(2)(b)(3), TEN-TEN's owners, managers, and non-administrative employees shall successfully complete the program once every year thereafter.

TEN-TEN shall also encourage employees who are not owners, managers, or who do not handle or sell marijuana, to take the Responsible Vendor Training Program on a voluntary basis.

In compliance with 935 CMR 500.105(2)(b)(5), TEN-TEN shall maintain records of Responsible Vendor Training Program for at least four (4) years and made them available during normal business hours for inspection by the Commission and any other applicable licensing authority upon request.

In compliance with 935 CMR 500.105(2)(b)7, and as part of the Responsible Vendor Training Program, TEN-TEN's owners, managers, and non-administrative employees shall receive yearly training on a variety of topics relevant to marijuana, marijuana products, and marijuana establishment operations, including but not limited to the following:

a. Discussion concerning Marijuana's effect on the human body. Training shall include:
    i. Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
    ii. The amount of time to feel impairment;
    iii. Visible signs of impairment; and
    iv. Recognizing the signs of impairment.
b. Diversion prevention and prevention of sales to minors, including best practices;
c. Compliance with all tracking requirements;
d. Acceptable forms of identification. Training shall include:
    i. How to check identification;
    ii. Spotting false identification;
    iii. Provisions for confiscating fraudulent identifications; and
    iv. Common mistakes made in verification.
e. Other significant state laws and rules affecting operators, such as:
    i. Local and state licensing and enforcement;
    ii. Incident and notification requirements;
    iii. Administrative and criminal liability;
    iv. License sanctions;

v. Waste disposal;
vi. Health and safety standards;
vii. Patrons prohibited from bringing marijuana onto licensed premises;
viii. Permitted hours of sale;
ix. Conduct of establishment;
x. Permitting inspections by state and local licensing and enforcement authorities;
xi. Licensee responsibilities for activities occurring within licensed premises;
xii. Maintenance of records;
xiii. Privacy issues; and
xiv. Prohibited purchases and practices.

f. Such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program.

Pursuant to 935 CMR 500.105(9)(d)2(d) and (g), TEN-TEN shall maintain 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, as well as a notice of completed responsible vendor and eight-hour related duty training.

Overview of TEN-TEN's Personnel Policies including Background Checks

TEN-TEN LLC ("TEN-TEN") has established policies and procedures regarding recordkeeping and record retention in order to ensure the maintenance, safekeeping, and accessibility of critical documents.

To ensure confidentiality, written personnel records shall be stored in a locked area designated for record retention. Electronic records will be password protected and shall be stored on the TEN-TEN server, in on-site and off-site backup, and in the cloud, as necessary. All written and electronic records shall be available for inspection by the Commission upon request in compliance with 935 CMR 500.105(1).

The Personnel (Staffing) Records will be kept in compliance with 935 CMR 500.105(9)(d), including but not limited to, written and/or electronic records of:

- Job descriptions for each agent, as well as organizational charts consistent with the job descriptions;
- Personnel records for each marijuana establishment agent. Such records shall be maintained for at least twelve (12) months after termination of the agent's affiliation with TEN-TEN 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; and
    - Notice of completed responsible vendor and eight-hour related duty training.

TEN-TEN's Written Operating Policies and Procedures are in compliance with 935 CMR 500.105, and include, but are not limited to:

- TEN-TEN is an alcohol, smoke, and drug-free workplace, pursuant to 935 CMR 500.105(1)(k);
- Any TEN-TEN agent or employee shall be immediately terminated, pursuant to 935 CMR 500.105(1)(m), who has:

        - Diverted marijuana, which shall be reported to law enforcement authorities and to the Commission;
        - Engaged in unsafe practices with regard to TEN-TEN's operations, which shall be reported to the Commission; or
        - Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or alike violation in any other jurisdiction.
- TEN-TEN's job descriptions comply with 935 CMR 500.105(9)(d)(1);
- Background Checks: All agents, employees, and owners of TEN-TEN will undergo a detailed background investigation by the Cannabis Control Commission ("CCC") and/or TEN-TEN, prior to being granted access to a TEN-TEN facility or beginning work duties;
- TEN-TEN's Staffing plan is in compliance with 935 CMR 500.105(9)(d) and 935 CMR 500.105(1)(i):
    - Until licensed and in full operation, not all positions detailed below will be filled. Instead, a limited number of individuals will assume the responsibilities of the unfilled positions. The job descriptions for potential positions are provided below.
        - CULTIVATION (INDOOR) STAFFING PLAN:
            - Initially, four (4) individuals and eventually eight to ten employees, including a Cultivation Manager, Cultivation Associates, and required Security Personnel.
        - CULTIVATION (OUTDOOR) STAFFING PLAN:
            - Initially, the staff from the Indoor Cultivation will be utilized for the Outdoor growth as that will primarily be for Mothers plants to be exposed to natural sunlight, and required Security Personnel. Eventually, there will be six to eight employees for the Outdoor Cultivation in addition to
        - RETAIL STAFFING PLAN:
            - Six to eight employees to open the Retail Establishment including a Retail Manager, Retail Associates, and required Security Personnel.
        - PRODUCTION STAFFING PLAN:
            - Two to four employees to begin the Production Establishment including a Production Manager, Production Associate, and required Security Personnel.

Job Descriptions in compliance with 935 CMR 500.105(9)(d)(1):

Security Manager: Under the supervision of senior management, the Security Manager is responsible for the safety and security of TEN-TEN's owners; employees; agents; visitors, vendors, and contractors while on TEN-TEN property; TEN-TEN's property, facilities, assets, inventory, raw materials, equipment, and waste; TEN-TEN's host community, as affected by TEN-TEN's safety and security. The Security Manager is also responsible for the development, implementation, administration, maintenance, and management of TEN-TEN's Security Policies

and Procedures. The Security Manager supervises the security staff (once hired) and performs their duties and responsibilities until the security staff is hired, and subsequent to their hiring, as necessary. In addition, the Security Manager shall be responsible to:

- With the Human Resource Manager, ensure that TEN-TEN performs and maintains the records of the required background checks, in accordance with M.G.L c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, 803 CMR 2.00: Criminal Offender Record Information (CORI), and 935 CMR 500.105(9)(d)5.
- With the Retail Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.050(8)(b) and 935 CMR 500.140.
- With the Human Resources Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.105(1).
- With the Human Resources Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.105(2)(a) and (2)(b).
- With the Inventory Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.105(8).
- Ensure that TEN-TEN is in compliance with 935 CMR 500.110(1) or (2), 935 CMR 500.110(4) to 935 CRM 500.110(7), and 935 CMR 500.110(9) and (10).
- With the Retail Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.140(2).
- Ensure that TEN-TEN is in compliance with its Plan for Restricting Access to Age 21 or Older and update that plan as necessary.
- Ensure that TEN-TEN is in compliance with its Safety and Security Plan and update that plan as necessary.
- Ensure that TEN-TEN is in compliance with its Plan for Prevention of Diversion and update that plan as necessary.
- Ensure that TEN-TEN is in compliance with its Storage and Waste Disposal Plan and update that plan as necessary.
- Ensure that TEN-TEN is in compliance with its Shipping, Receiving and Transportation Plans and update those plans as necessary.
- Ensure that TEN-TEN is in compliance with its Inventory Procedures and update those procedures as necessary.
- Ensure that TEN-TEN is in compliance with its Retail Establishment Procedures and update those procedures as necessary.
- Ensure that TEN-TEN is in compliance with its Qualifications and Intended Trainings for Owners, Managers and Marijuana Establishment Agents and update as necessary.
- Ensure that TEN-TEN is in compliance with all safety and security requirements contained in the relevant CMRs and in TEN-TEN policies and procedures which are not referenced above and update TEN-TEN's policies and procedures as necessary.

- Develop, implement and update and health and safety policies, procedures, programs and responsibilities for the security agents.
- Train the security agents in the health and safety policies, procedures, programs and responsibilities for security staff.
- With the Human Resources Manager, assist the management staff in developing, implementing, updating and training staff in health and safety policies, procedures, and programs for their respective areas, ensure those policies, procedures, and programs are implemented and followed, including, but not limited to conducting regular and random health and safety checks.
- Hire, train, oversee, promote, discipline, and terminate security staff, with the assistance of Human Resources.
- Assume the responsibilities of the Inventory Manager and the Compliance Manager, until such time as TEN-TEN's business operations are of such size that TEN-TEN is able to fill those positions.
- Perform any and all other duties, as directed by senior management.

Security Agent: The duties and responsibilities identified below will be performed by the Security Manager until the Security staff has been hired, and, subsequent to their hiring, as necessary. Security staff supports the Security Manager in the performance of his or her duties, monitors TEN-TEN's security systems, including but not limited to the alarm and surveillance systems, and monitors and maintains the access control systems. Security staff are responsible for ensuring that only authorized individuals are permitted access to TEN-TEN's facilities by verifying ID cards and other forms of identification. In addition, security staff perform the following duties and any and all other duties, as assigned:

- Investigate, communicate, and provide leadership in the event of an emergency, such as an intrusion, fire, or other threat that jeopardizes TEN-TEN staff, agents, customers, visitors, vendors, and contractors and TEN-TEN'/s host community.
- Respond to and investigate security situations and alarm activations; clearly document any incidents in written reports.
- Oversee the entrance to TEN-TEN's facilities and verify the credentials of each person seeking access to TEN-TEN facilities.
- Manage the flow of staff, agents, customers, visitors, vendors, and contractors, including maintaining the visitor log and issuing and collecting visitor badges.
- Escort authorized visitors, vendors, and contractors while in restricted access areas.
- Answer routine inquiries.
- Perform security and health and safety checks at designated intervals and at random.
- Escort TEN-TEN agents, employees, visitors, vendors and contractors from TEN-TEN's facility to their vehicles during non-business hours.

Inventory Manager: The Inventory Manager is responsible for implementing inventory controls, maintaining inventories of in-process and finished marijuana and marijuana products using the BiotrackTHC (or its equivalent) and metrc systems on a day-to-day basis, as well as performing and/or overseeing the performance of the shift, daily, weekly, monthly, quarterly and annual inventory counts. The Inventory Manager is also responsible for maintaining inventories of raw materials, supplies, equipment, and physical assets. The Inventory Manager is responsible for labeling, tracking, and reporting on inventories of in-process and finished marijuana and marijuana products, as well as of raw materials, supplies, equipment, and physical assets. Further, the Inventory Manager is responsible for maintaining all records relating to TEN-TEN's inventory. Additionally, the Inventory Manager, along with the other Managers, is also responsible for ensuring the Commission's storage and waste disposal requirements are implemented and maintained. The Inventory Manager shall perform any and all other duties, as directed by senior management. In addition, the Inventory Manager shall be responsible to:

- With the Security Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.105(8).
- Ensure that TEN-TEN is in compliance with 935 CMR 500.105 (9), and (13).
- Ensure that TEN-TEN is in compliance with its Plan for Prevention of Diversion and update that plan as necessary.
- Ensure, with management counterparts, that TEN-TEN is in compliance with its Storage and Waste Disposal Plan and update that plan as necessary.
- Ensure that TEN-TEN is in compliance with its Shipping, Receiving and Transportation Plans, and update that plan as necessary.
- Ensure, along with management counterparts, that TEN-TEN is in compliance with its Inventory Procedures and update those procedures as necessary.
- Ensure, along with the Retail Manager, that TEN-TEN is in compliance with its Retail Establishment Procedures and update those procedures as necessary.
- Develop, implement, and update and health and safety policies, procedures, programs, and responsibilities for the inventory associates.
- Train the inventory associates in the health and safety policies, procedures, programs, and responsibilities for the inventory associates.
- Hire, train, oversee, promote, discipline, and terminate inventory associates, with the assistance of Human Resources.

Inventory Associate: Inventory associates support the Inventory Manager in the performance of his or her responsibilities.

Human Resources Manager: TEN-TEN's Human Resources (HR) Manager will support the senior management and the line managers to ensure effective implementation of all personnel policies and procedures for TEN-TEN, including TEN-TEN's hiring processes. The HR Manager

will develop, implement, update, and enforce TEN-TEN's Personnel Policy Manual, and will ensure that TEN-TEN adheres to the policies herein. Until such time as TEN-TEN's businesses have grown large enough to support the hiring of an HR Manager, the HR responsibilities will be handled by Scot Trifilo, TEN-TEN's owner, or his designee. Additionally, the HR Manager will:

- With the Security Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.105(1).
- With the Security Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.105(2)(a) and (2)(b).
- With the Security Manager, ensure that TEN-TEN performs and maintains the records of the required background checks, in accordance with M.G.L c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, 803 CMR 2.00: Criminal Offender Record Information (CORI), and 935 CMR 500.105(9)(d)5.
- Oversee hiring, training, promotions, management, disciplinary actions and terminations of TEN-TEN personnel.
- Ensure that TEN-TEN is in compliance with the Diversity Plan submitted to the Commission, and update that plan as necessary.
- Ensure that Ten-Ten is in compliance with the Plan to Positively Impact Areas of Disproportionate Impact submitted to the Commission and update that plan as necessary.
- Develop, implement and update trainings, training policies and training schedules for TEN-TEN's employees.
- With the Security Manager, assist the management staff in developing, implementing, updating and training staff in health and safety policies, procedures, and programs for their respective areas, ensure those policies, procedures and programs are implemented and followed, including, but not limited to conducting regular and random health and safety checks.
- Ensure compliance with any and all workplace laws, rules, and regulations, including but not limited to state and federal anti-discrimination statutes and Equal Employment Opportunity Commission (EEOC) requirements; state and federal leave laws and regulations; state and federal workplace safety laws and regulations, state and federal workers compensation laws and regulations; state and federal minimum wage requirements; and any and all other applicable local, state, or federal employment laws, rules, or regulations.
- Perform any and all other duties, as directed by senior management.

Cultivation Manager: TEN-TEN's Cultivation Manager will be responsible for the operations and maintenance of TEN-TEN's Indoor and Outdoor Cultivation facilities. Additionally, the Cultivation Manager will:

- Ensure, with the Production Manager, that TEN-TEN is in compliance with the Policies and Procedures for Cultivation submitted to the Commission and update those policies and procedures as necessary.

- Ensure, with the Production Manager, that TEN-TEN is in compliance with the general operational requirements under 935 CMR 500.105 and the additional operational requirements under 935 CMR 500.120.
- Ensure, with the Production Manager, that TEN-TEN is in compliance with the minimum energy and equipment standards as promulgated by the Commission.
- Ensure, with the Production Manager, that TEN-TEN is in compliance with the Marijuana and Marijuana Product Quality Control Processes, Product Safety Plans, and Testing Procedures submitted to the Commission and update those processes, plans and procedures as necessary.
- Ensure, with management counterparts, that TEN-TEN is in compliance with the Storage and Waste Disposal Plans submitted to the Commission and update those plans as necessary.
- Develop, implement, and update policies and procedures for the operations and maintenance of the cultivation facilities, including but not limited to the HVAC and dehumidification systems.
- Train the cultivation associates in the operations and maintenance of the cultivation facilities, including but not limited to the HVAC and dehumidification systems.
- Develop, implement and update health and safety policies, procedures, programs, and responsibilities for the indoor and outdoor cultivation facilities.
- Train the cultivation associates in the health and safety policies, procedures, programs, and responsibilities for the indoor and outdoor cultivation facilities.
- Develop, implement and update cleaning, maintenance, planting, irrigation, fertilization, pruning, trimming, potting, re-potting, integrated pest management (IPM), lighting and harvesting policies, procedures and schedules, and marijuana, soil and growth media testing policies, procedures and schedules.
- Train the cultivation associates in cleaning, maintenance, planting, irrigation, fertilization, pruning, trimming, potting, re-potting, integrated pest management (IPM), lighting and harvesting policies, procedures and schedules.
- Train the cultivation associates in marijuana, soil and growth media testing policies, procedures and schedules.
- With the Production Manager, develop, implement, and update policies and procedures to transition harvested plant material from the cultivation rooms to the trim room.
- Train the cultivation associates in the policies and procedures to transition harvested plant material from the cultivation rooms to the trim room.
- With the Production Manager, develop, implement, and update policies and procedures to ensure prompt transfer of marijuana trim to the production of pre-rolled joints.
- Train the cultivation associates in the policies and procedures to ensure prompt transfer of marijuana trim to the production of pre-rolled joints.
- Develop, implement, and update policies and procedures for storage and waste disposal for TEN-TEN's cultivation facilities.

- Train the cultivation associates in the policies and procedures for storage and waste disposal.
- Hire, train, oversee, promote, discipline and terminate cultivation staff, with the assistance of Human Resources.
- Coordinate with the Production Manager to ensure a steady flow of marijuana to meet TEN-TEN's needs.
- Maintain a database of information regarding indoor and outdoor cultivation environmental conditions, including but not limited to temperature, humidity, precipitation, irrigation, lighting, fertilization, pruning, trimming, potting, re-potting, pests and integrated pest management (IPM), and biological contaminants.
- Maintain a database of information regarding quantity and quality of indoor and outdoor harvests of flower and trim.
- Cross-reference the two databases to allow the Cultivation Manager, Production Manager and senior management to develop, implement and update the most effective strategies to produce the highest possible number and quality of crops, considering quality, quantity and consistency of flower and trim produced.
- Perform any and all other duties, as directed by senior management.

Cultivation Associate: Cultivation associates assist the Cultivation Manager in the performance of his or her responsibilities as above, as well as:

- Operate and maintain the cultivation facilities, including but not limited to the HVAC and dehumidification systems.
- Follow the health and safety policies, procedures, programs, and responsibilities for the indoor and outdoor cultivation facilities.
- Follow the cleaning, maintenance, planting, irrigation, fertilization, pruning, trimming, potting, re-potting, integrated pest management (IPM), lighting and harvesting policies, procedures and schedules.
- Follow the marijuana, soil and growth media testing policies, procedures and schedules.
- Follow the policies and procedures for storage and waste disposal.
- Perform all other duties as assigned.

Production Manager Marijuana and Production Manager Marijuana Products: For the purposes of this policy, the duties and responsibilities of the Production Manager for Marijuana and those of the Production Manager for Marijuana Products are combined. TEN-TEN, at its option, may choose to divide those duties and responsibilities, based on TEN-TEN's business needs. The Production Manager is responsible for all post-harvest handling of marijuana and the manufacturing of all marijuana products. The Production Manager coordinates with the Cultivation Manager to ensure a steady flow of marijuana to meet TEN-TEN's needs. The Production Manager will be responsible for the: operation and maintenance of TEN-TEN's trim

room and drying room; marijuana packaging; pre-rolled joints and packaging of pre-rolled joints; and marijuana product production and marijuana product packaging, as well as will:

- Ensure, with the Cultivation Manager, that TEN-TEN is in compliance with the Policies and Procedures for Cultivation submitted to the Commission and update those policies and procedures as necessary.
- Ensure, with the Cultivation Manager, that TEN-TEN is in compliance with the general operational requirements under 935 CMR 500.105 and the additional operational requirements under 935 CMR 500.120.
- Ensure, with the Cultivation Manager, that TEN-TEN is in compliance with the minimum energy and equipment standards as promulgated by the Commission.
- Ensure, with the Cultivation Manager, that TEN-TEN is in compliance with the Marijuana and Marijuana Product Quality Control Processes, Product Safety Plans, and Testing Procedures submitted to the Commission and update those processes, plans and procedures as necessary.
- Ensure, with management counterparts, that TEN-TEN is in compliance with the Storage and Waste Disposal Plans submitted to the Commission and update those plans as necessary.
- Ensure that TEN-Ten is in compliance with the Types of Products Manufactured and the Methods to Produce Products submitted to the Commission and update those submissions as necessary.
- Develop, implement, and update policies and procedures for the operations and maintenance of the trim room and drying room, including maintaining a sterile environment and safe use of mechanical and manual marijuana trimmers.
- Train the production associates in the policies and procedures for the operations and maintenance of the trim room and drying room, including maintaining a sterile environment and safe use of mechanical and manual marijuana trimmers.
- Develop, implement and update health and safety policies, procedures, programs, and responsibilities for production facilities.
- Train the production associates in the health and safety policies, procedures, programs, and responsibilities for production facilities.
- Develop, implement and update a rigid cleaning schedule for production facilities, to ensure and maintain product quality.
- Train the production associates in the rigid cleaning schedule for production facilities, to ensure and maintain product quality.
- With the Cultivation Manager, develop, implement, and update policies and procedures to transition harvested plant material from the cultivation rooms to the trim room.
- Train the production associates in the policies and procedures to transition harvested plant material from the cultivation rooms to the trim room.

- With the Cultivation Manager, develop, implement, and update policies and procedures to ensure prompt transfer of marijuana trim to the production of pre-rolled joints.
- Train the production associates in the policies and procedures to ensure prompt transfer of marijuana trim to the production of pre-rolled joints.
- Develop, implement, and update policies and procedures for trimming marijuana manually and mechanically.
- Train the production associates in the policies and procedures for trimming marijuana manually and mechanically.
- Develop, implement, and update policies and procedures to maintain and ensure quality control of finished flower.
- Train the production associates in the policies and procedures to maintain and ensure quality control of finished flower.
- Develop, implement, and update policies and procedures to monitor the status of the drying room and of the marijuana flowers that are in the process of drying.
- Train the production associates in the policies and procedures to monitor the status of the drying room and of the marijuana flowers that are in the process of drying.
- Develop, implement, and update policies and procedures to enter wet and dry weights of all product, including flower and trim, into BiotrackTHC (or its equivalent) and metrc.
- Train the production associates in policies and procedures to enter wet and dry weights of all product, including flower and trim, into BiotrackTHC (or its equivalent) and metrc.
- Develop, implement, and update policies and procedures for bulk packaging of flower and trim, and storage in the dedicated vault.
- Train the production associates in policies and procedures for bulk packaging of flower and trim, and storage in the dedicated vault.
- Develop, implement, and update policies and procedures for the preparation of trim for the rolling of pre-rolled joints and the manufacture of pre-rolled joints.
- Train the production associates in the policies and procedures for the preparation of trim for the rolling of pre-rolled joints and the manufacture of pre-rolled joints.
- Develop, implement, and update policies and procedures for storage and waste disposal for TEN-TEN's production facilities.
- Train the production associates in the policies and procedures for storage and waste disposal.
- Develop, implement, and update policies and procedures for the creation of marijuana products, including, but not limited to creating raw Super Critical CO2 (SCCO2) concentrate and creating distilled, high-purity concentrate, in accordance with the Types of Products Manufactured and the Methods to Produce Products submitted to the Commission, updating those submissions as necessary.

- Train the production associates in policies and procedures to create marijuana products, including, but not limited to creating raw Super Critical CO2 (SCCO2) concentrate and creating distilled, high-purity concentrate.
- Develop, implement, and update policies and procedures to manage inventory and periodic automatic replenishment (PAR) levels of all concentrate and marijuana products, including integration into BiotrackTHC (or its equivalent) and metrc.
- Train the production associates in policies and procedures to manage inventory and periodic automatic replenishment (PAR) levels of all concentrate and marijuana products, including integration into BiotrackTHC (or its equivalent) and metrc.
- Develop, implement, update and maintain an extraction schedule, based on the availability of marijuana flower and trim.
- Hire, train, oversee, promote, discipline and terminate production staff, with the assistance of Human Resources.
- Perform all other duties as assigned by senior management.

Production Staff: Production associates assist the Production Manager in the performance of his or her responsibilities as above, as well as:

- Operating and maintaining the production facilities, including but not limited to the trim room, drying room and production rooms, including maintaining a sterile environment and safe use of mechanical and manual marijuana trimmers.
- Drying and grinding cultivated material in preparation for SCCO2 extraction.
- Unpacking and cleaning the SCCO2 extractor.
- Cleaning and sanitization of all glassware, kitchen cookware and utensils, and the distillation still.
- Performing scheduled maintenance on all equipment.
- Packaging completed marijuana product and concentrates.
- Following the health and safety policies, procedures, programs, and responsibilities for the production facilities.
- Following the cleaning and maintenance policies, procedures and schedules.
- Following the policies and procedures for storage and waste disposal.
- Performing all other duties as assigned.

Retail Manager: The Retail Manager is responsible for operating and maintaining TEN-TEN's Retail Establishment. Additionally, the Retail Manager will:

- Ensure TEN-TEN is in compliance with the Retail Establishment Procedures submitted to the Commission and update those procedures as necessary.
- Ensure that TEN-TEN is in compliance with the Plan for Restricting Access to TEN-TEN's Marijuana Retail Store to Consumers Age Twenty-one (21) and Older submitted to the Commission and update that plan as necessary.

- Ensure that TEN-TEN is in compliance with the Plan for Prevention of Diversion submitted to the Commission and update that plan as necessary.
- Ensure that TEN-TEN's Retail Vault is in compliance with the Storage and Waste Disposal Plan submitted to the Commission and update that portion of the plan as necessary.
- Ensure, along with the Inventory Manager, that TEN-TEN is in compliance with the Inventory Procedures submitted to the Commission and update those procedures as necessary.
- Ensure that TEN-TEN is in compliance with the Records related to Recording Sales portion of the Recordkeeping Policies and Procedures submitted to the Commission and update that portion of those policies and procedures as necessary.
- Ensure TEN-TEN is in compliance with the General Requirements of a Marijuana Retailer under 935 CMR 500.050(8), the additional requirements under 935 CMR 500.101(3)(e),the Marketing and Advertising Requirements under 935 CMR 500.105(4) and (6), the Cash Handling and Transportation Requirements under 935 CMR 500.110(7), the Additional Operational Requirements for Retail Sale under 935 CMR 500.140, the requirements set forth in M.G.L. c. 94G, § 4(a½)(xxvi), the Marketing and Advertising Requirements under 935 CMR 500.105(6), the Additional Labeling and Packaging Requirements for Edible Marijuana Products under 935 CMR 500.150(3), and the Dosing Limitations for Edible Marijuana Products under 935 CMR 500.150(4).
- Develop, implement, and update policies and procedures to ensure that TEN-TEN's Retail Establishment is in compliance with the above, including but not limited to policies and procedures for the day-to-day operations of TEN-TEN's Retail Establishment.
- Train the retail staff in the policies and procedures developed, implemented and updated in accordance with the above, to ensure TEN-TEN's Retail Establishment is in compliance with the above, including but not limited to policies and procedures for the day-to-day operations of TEN-TEN's Retail Establishment.
- Develop, implement and update and health and safety policies, procedures, programs and responsibilities for the retail staff.
- Train the retail staff in the health and safety policies, procedures, programs and responsibilities for the retail staff.
- Develop, implement and update policies and procedures to ensure that retail associates are knowledgeable regarding all of the products offered by TEN-TEN, including but not limited to flower, pre-rolled joints, concentrates, extracts, tinctures, and edibles, including but not limited to their strains, use, potency, active tetrahydrocannabinol (THC) levels, dosing, labeling, packaging, and paraphernalia required for use.
- Train the retail staff in the policies and procedures to ensure that they are knowledgeable regarding all of the products offered by TEN-TEN, including but not limited to flower, pre-rolled joints, concentrates, extracts, tinctures, and edibles, including but not limited to their strains, use, potency, active tetrahydrocannabinol (THC) levels, dosing, labeling, packaging, and paraphernalia required for use.

- Develop, implement and update policies and procedures to ensure that products are properly displayed and merchandised, while maintaining product security in compliance with Commission requirements.
- Train the retail staff in the policies and procedures to ensure that products are properly displayed and merchandised, while maintaining product security in compliance with Commission requirements.
- Develop, implement and update policies and procedures to ensure that each retail customer is treated with respect and receives the appropriate amount of individualized attention in order to address his/her specific needs and questions, including active listening to ensure understanding of customer needs.
- Train the retail staff in the policies and procedures to ensure that ensure that each retail customer is treated with respect and receives the appropriate amount of individualized attention in order to address his/her specific needs and questions, including active listening to ensure understanding of customer needs.
- Develop, implement and update policies and procedures to ensure that all transactions are properly weighed, packaged, recorded and entered into the point-of-sale (POS) system, BiotrackTHC (or its equivalent) and metrc.
- Train the retail staff in the policies and procedures to ensure that all transactions are properly weighed, packaged, recorded and entered into the point-of-sale (POS) system, BiotrackTHC (or its equivalent) and metrc.
- Develop, implement and update policies and procedures to ensure that all cash is properly handled, and credit card transactions are properly authorized and processed.
- Train the retail staff in the policies and procedures to ensure that all cash is properly handled, and credit card transactions are properly authorized and processed.
- Develop, implement and update retail sales plans, including sales and gross margin plans by department, product classification, product and retail associate to ensure sufficient sales, profits and inventory.
- Report hourly, daily, weekly, monthly, seasonal and annual retail sales and gross margin performance vs. plan to senior management, including sales and gross margin by department, product classification, product and retail associate.
- Evaluate hourly, daily, weekly, monthly, seasonal and annual retail sales and gross margin performance vs. plan, including sales and gross margin by department, product classification, product and retail associate, and make recommendations to senior management accordingly.
- Train the retail staff to review and evaluate their sales and gross margin performance vs. plan and to adjust their behaviors accordingly.
- Develop, implement and update opening, closing and shift change plans, and ensure that the retail staff follow the appropriate plans.
- Train the retail staff to follow the appropriate opening, closing and shift change plans.

- Supplement the retail staff, as required by customer volume, staff vacations, and/or staff absences.
- Based on sales plans and sales performance, develop and implement retail staffing plans to maximize coverage and minimize expense.
- Hire, train, oversee, promote, discipline and terminate retail staff, with the assistance of Human Resources.
- Develop, implement, and update policies and procedures to ensure customer satisfaction.
- Train the retail staff in the policies and procedures to ensure customer satisfaction.
- Develop and implement feedback tools to determine levels of customer satisfaction, and share the results with retail staff, managers and senior management.
- Interact with dissatisfied customers to ensure their satisfaction; document each interaction for feedback and additional training for the retail staff involved and transmit the documentation to Human Resources and senior management, as appropriate.
- Interact with satisfied customers who wish to share their satisfaction; document each interaction for feedback with the retail staff involved and transmit the documentation to Human Resources and senior management, as appropriate.
- Perform all other duties as assigned by senior management.

Retail Associate: Retail associates assist the Retail Manager in the performance of his duties as above that ensure that each retail customer is treated with respect and receives the appropriate amount of individualized attention in order to address his/her specific needs and questions. Retail associates' responsibilities include, but are not limited to:

- Maintaining a clean, safe, healthy, and productive environment ensuring that customers have a positive experience at TEN-TEN's retail establishment.
- Assisting the Retail Manager in dealing with any dissatisfied customers.
- Becoming knowledgeable regarding all of the products offered by TEN-TEN, including but not limited to: flower, pre-rolled joints, concentrates, extracts, tinctures, and edibles, including but not limited to their strains, use, potency, active tetrahydrocannabinol (THC) levels, dosing, labeling, packaging, and paraphernalia required for use.
- Actively listening to ensure understanding of customer needs, and answer customer questions regarding products including, but not limited to: flower, pre-rolled joints, concentrates, extracts, tinctures, and edibles, including but not limited to their use, potency, active tetrahydrocannabinol (THC) levels, dosing, labeling, packaging, and paraphernalia required for use.
- Maintaining and enhancing product display and merchandising, in accordance with TEN-TEN policies and procedures, while maintaining product security in compliance with Commission requirements.
- Ensuring that all transactions are properly weighed, packaged, recorded and entered into the point-of-sale (POS) system, BiotrackTHC (or its equivalent) and metrc.

- Ensuring that all cash is properly handled, and that credit card transactions are properly authorized and processed.
- Reviewing and evaluating individual sales and gross margin performance vs. plan and adjusting individual behaviors accordingly.
- Learning and following the appropriate health and safety policies and procedures.
- Learning and following the appropriate opening, closing and shift change plans.
- Participating in ongoing training and professional development as required.
- Performing all other duties as assigned.

TEN-TEN LLC's Plan for Restricting Access to TEN-TEN's Indoor Cultivation Facilities to Individuals Age Twenty-one (21) and Older

Pursuant to 935 CMR 500.110(1)(a) and TEN-TEN's Safety and Security Plan, no individuals under the age of twenty-one (21) shall be permitted in any of TEN-TEN's Marijuana Establishments. Pursuant to 935 CMR 500.030(1), all board members, directors, employees, executives, managers, and employees of TEN-TEN shall be registered Marijuana Establishment Agents, and all such individuals shall be twenty-one (21) years of age or older. Pursuant to 935 CMR 500.110(1)(a) and TEN-TEN's Safety and Security Plan, TEN-TEN shall not admit visitors under the age of twenty-one (21) to TEN-TEN's Indoor Cultivation facilities.

Written Procedures Required to Ensure that Individuals Under Twenty-one (21) Years of Age are Not Admitted to TEN-TEN's Facilities

In accordance with 935 CMR 500.105(1), TEN-TEN shall develop and maintain a set of detailed written operating procedures, including, but not limited to those required by statute and CCC regulations, which shall specifically include processes to ensure that individuals under twenty-one (21) years of age are not admitted to TEN-TEN's facilities.

Pursuant to TEN-TEN's Safety and Security Plan:

All outside vendors, contractors and visitors shall obtain a visitor identification badge from TEN-TEN Security personnel prior to entering a limited access area and shall be escorted at all times by a Marijuana Establishment Agent authorized to enter the limited access area. The visitor identification badge shall be visibly displayed at all times. All visitors must be logged in and out and that log shall be available for inspection by the Commission at all times. All visitor identification badges shall be returned to TEN-TEN on exit.
(935 CMR 500.110(4)(e))

Individuals under the age of twenty-one (21) are not allowed on TEN-TEN's premises or in TEN-TEN's facilities. TEN-TEN shall employ security policies and procedures to ensure that individuals under the age of twenty-one (21) do not gain entry to TEN-TEN's premises and facilities.

All TEN-TEN premises and facilities shall have a sign posted at their entrances and exits that shall be a minimum of twelve inches by twelve inches (12" x 12") and which states in **bold** type: "**No one under twenty-one (21) years of age permitted. All persons shall present a valid, current government-issued photo identification card with a clearly visible, unaltered date of birth.**" in lettering no smaller than one inch (1") in height. Security personnel shall verify that the age of every visitor is twenty-one (21) years or

older, and log information regarding the visitor, including but not limited to the visitor's name, contact information, and numbered visitor identification badge issued, time of arrival and departure, purpose of visit, facilities and areas to be accessed, the names of any employees visited, as well the names of the Marijuana Establishment Agent or Agents escorting the visitor. If the visitor is a regulatory agent, a law enforcement agent, or an emergency responder visiting TEN-TEN on a non-emergency basis, the visitors' log shall also reflect their badge number. The visitors' log shall be available for inspection by the Commission and law enforcement agencies at all times.

Parties at TEN-TEN Responsible for Ensuring that the Above is Enforced

Once TEN-TEN has achieved a sufficient volume of sales to justify the hiring of a Compliance Manager, the Compliance Manager shall be responsible for developing and maintaining a set of detailed written operating procedures, which shall specifically include the above processes, to ensure that individuals under twenty-one (21) years of age are not admitted to TEN-TEN's facilities, in accordance with 935 CMR 500.105(1) and 935 CMR 500.105(1)(p).

Until such time as TEN-TEN achieves a sufficient volume of sales to justify the hiring of a Compliance Manager, the TEN-TEN Security Manager shall be responsible for the responsibilities of the Compliance Manager.

DIVERSITY PLAN

TEN-TEN, LLC, Inc. ("TEN-TEN") believes in creating and sustaining a robust policy of inclusivity and diversity not only in the employees they hire but with the vendors they engage and their suppliers. TEN-TEN recognizes that diversity in the workforce is key to the integrity of a company's commitment to its community. TEN-TEN's diversity plan is designed to promote equity among minorities, women, veterans, people with disabilities, and LGBTQ+. TEN-TEN will make every effort to employ and advance in employment qualified, and diverse people at all levels within the company and engage the services of those companies who are owned and operated by minorities, women, veterans, people with disabilities, and LGBTQ+.

Diversity Recruitment

TEN-TEN will establish and maintain, as much as is possible, an inclusive and diverse workforce to serve its customers through the recruitment of employees from the farming community of Sheffield and surrounding communities, with a focus on veterans, persons with disabilities, and women because according to the 2018 Census, Sheffield is 99.6% white Americans, and 50% of the households are married couples. Although 51% are women, they have a median age of 52.1 years. There are only 67 people per square mile in Sheffield, and Sheffield is not accessible by bus from any other community in Massachusetts.

TEN-TEN will recruit through the Southern Berkshire District Department of Veterans Services, the Sheffield Commission on Disabilities, the Sheffield Agricultural Commission, the Council on Aging, the Sheffield Police Department self-defense program for women, the seven (7) Veteran of Foreign War (VFW) Posts within 20 miles of Sheffield, and the eight (8) American Legion Posts within 30 miles of Sheffield, including the one in Sheffield. TEN-TEN will also recruit at local programs, including Riverbrook Residence, Inc., a community of women with developmental disabilities, Gould Farm, a therapeutic community for people with mental health and related challenges, the Stanton Home for people with special needs, the Berkshire Stonewall Community Coalition, Rainbow Seniors, as well as MASSHIRE Berkshire Workforce, Indeed and Ziprecruit online. TEN-TEN will hold recruitment events in the Sheffield Library Meeting Room away from those under 21 years of age; if there is sufficient interest, TEN-TEN will conduct on-sight recruiting activities at the programs listed above.

Strategic Partnerships, Suppliers and Vendors

TEN-TEN intends to engage the services from vendors, contractors, and professional service providers that are owned and operated by minorities, women, veterans, people with disabilities, and people of non-conforming gender identities and sexual orientations, and who are also committed to diversity and inclusion. In selecting potential contractors, subcontractors, vendors and suppliers, TEN-TEN will contract with businesses who share TEN-TEN's goal to maintain a diverse organization.

Goal 1 – TEN-TEN establishments will employ a minimum of twenty-five percent (25%) of its workforce from minorities, women, veterans, people with disabilities, and the LGBTQ+ community and provide tools to ensure their success.

Programs to support Goal 1

- Recruiting events will occur quarterly;
- Develop ongoing relationships with organizations serving minorities, women, LGBTQ+, veterans, and persons with disabilities for employment referrals;
- For each job opening, encourage employees to refer diverse applicants for employment;
- For each job opening, utilize Zip Recruiter and Indeed, as well as online career and job websites, and include diversity-welcome language in all recruiting;

- Annually, review TEN-TEN's Diversity Plan with all management to ensure that the Diversity Plan is fully understood;
- Require all TEN-TEN employees and management complete diversity awareness training both upon hiring and annually, emphasizing TEN-TEN's zero-tolerance of harassment and/or discrimination and TEN-TEN's strict commitment to take corrective action should any issues, concerns, or complaints arise; and
- Obtain feedback following new-hire and annual training to ensure TEN-TEN's commitment to diversity is understood.

Metrics used to Measure TEN-TEN's Success in Meeting Goal 1

- TEN-TEN will track and record contacts with, and employment referrals from, organizations serving minorities, women, LGBTQ+, veterans, and persons with disabilities, and any resulting hiring;
- TEN-TEN will track employee referrals of diverse applicants and any resulting hiring;
- TEN-TEN senior management will review each recruiting campaign to ensure that diversity-welcome language is included;
- TEN-TEN's Human Resources Manager or senior management will annually review TEN-TEN's Diversity Plan with all management and executives to ensure that the Diversity Plan is fully understood;
- TEN-TEN will track employee, management and executive completion of new-hire and annual diversity training, and obtain feedback regarding same;
- TEN-TEN will track any issues, concerns, or complaints regarding harassment and/or discrimination and TEN-TEN's response, which will be reviewed quarterly by senior management and executives; and
- TEN-TEN will report annually to the CCC the percentage of individuals working in TEN-TEN establishments that fall into the above-listed demographics, as compared to the prior reporting period, and document the methods used and progress toward Goal 1.

Goal 2 – TEN-TEN establishments will annually increase the number of minorities, women, veterans, people with disabilities, and LGBTQ+ individuals that are working in management and executive positions to twenty-five 25% percent.

Program to support Goal 2

- Develop ongoing relationships with organizations serving minorities, women, LGBTQ+, veterans, and persons with disabilities for management and executive employment referrals;
- For each management and executive job opening, encourage employees to refer diverse applicants for management and executive employment;
- For each management and executive job opening, utilize Zip Recruiter and Indeed, as well as online career and job websites, and include diversity-welcome language in all recruiting;
- Annually, review TEN-TEN's Diversity Plan with all management and executives to ensure that the Diversity Plan is fully understood;
- Require all TEN-TEN employees, management and executives complete diversity awareness training both upon hiring and annually, emphasizing TEN-TEN's zero-tolerance of harassment and/or discrimination and TEN-TEN's strict commitment to take corrective action should any issues, concerns, or complaints arise; and
- Obtain feedback following new-hire and annual training of management and executives to ensure TEN-TEN's commitment to diversity is understood.

Metrics used to Measure TEN-TEN's Success in Meeting Goal 2

- TEN-TEN will track and record contacts with, and management and executive employment referrals from, organizations serving minorities, women, LGBTQ+, veterans, and persons with disabilities, and any resulting hiring;
- TEN-TEN will track employee referrals of diverse management and executive applicants and any resulting hiring;
- TEN-TEN senior management will review each management and executive recruiting campaign to ensure that diversity-welcome language is included;
- TEN-TEN's Human Resources Manager or senior management will annually review TEN-TEN's Diversity Plan with all management and executives to ensure that the Diversity Plan is fully understood;
- TEN-TEN will track management and executive completion of new-hire and annual diversity training, and obtain feedback regarding same;
- TEN-TEN will track any issues, concerns, or complaints regarding harassment and/or discrimination and TEN-TEN's response, which will be reviewed quarterly by senior management and executives; and
- TEN-TEN will report annually to the CCC the percentage of individuals working in TEN-TEN establishments in management and executive positions that fall into the above-listed demographics, as compared to the prior reporting period, and the efforts made to achieve this goal.

Goal 3 – Twenty-five percent (25%) of TEN-TEN's vendors, suppliers, and service providers will be minorities, women, veterans, people with disabilities, and LGBTQ+ .

Program to support Goal 3:

- Determine before engaging vendors, suppliers, and professional service providers whether they are a certified minority or women or veteran-owned business; and
- Give preference to those vendors, suppliers, and professional service providers that are so certified.

Metrics used to Measure TEN-TEN's Success in Meeting Goal 3

- TEN-TEN will track vendor, supplier and professional service provider contacts, whether that business is a certified minority or women or veteran-owned business, whether TEN-TEN purchased products and/or services from that business, their value, and report the same annually to the CCC, and will, if necessary, revise its goals and the programs supporting them to achieve a greater percentage of vendors, suppliers, and service providers that fall into the above-listed categories.
- TEN-TEN will report annually to the CCC the percentage of vendors, suppliers, and professional services providers that fall into the above-listed demographics, as compared to the prior reporting period, and the efforts made to achieve this goal.

Acknowledgments

- TEN-TEN acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment;

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

RENEWAL 7-27-21

TEN-TEN's Plan for Separating Recreational from Medical Operations

TEN-TEN LLC is not applying for a medical license under 935 CMR 501.101. As a result, TEN-TEN LLC will not be a Medical Marijuana Treatment Center or selling medical marijuana. TEN-TEN LLC is ONLY applying for Recreational Retail Marijuana Establishment Licensure.

ADDENDUM: This plan will be updated to reflect the most recent changes to 935 CMR 500 et.al. Regulations in effect at the time of Ten-Ten's request for Post Provisional License Inspection

RENEWAL 7-27-21:

TEN-TEN LLC's Plan for Restricting Access to TEN-TEN's Indoor Cultivation Facilities to Individuals Age Twenty-one (21) and Older

Pursuant to 935 CMR 500.110(1)(a) and TEN-TEN's Safety and Security Plan, no individuals under the age of twenty-one (21) shall be permitted in any of TEN-TEN's Marijuana Establishments. Pursuant to 935 CMR 500.030(1), all board members, directors, employees, executives, managers, and employees of TEN-TEN shall be registered Marijuana Establishment Agents, and all such individuals shall be twenty-one (21) years of age or older. Pursuant to 935 CMR 500.110(1)(a) and TEN-TEN's Safety and Security Plan, TEN-TEN shall not admit visitors under the age of twenty-one (21) to TEN-TEN's Indoor Cultivation facilities.

Written Procedures Required to Ensure that Individuals Under Twenty-one (21) Years of Age are Not Admitted to TEN-TEN's Facilities

In accordance with 935 CMR 500.105(1), TEN-TEN shall develop and maintain a set of detailed written operating procedures, including, but not limited to those required by statute and CCC regulations, which shall specifically include processes to ensure that individuals under twenty-one (21) years of age are not admitted to TEN-TEN's facilities.

Pursuant to TEN-TEN's Safety and Security Plan:

All outside vendors, contractors and visitors shall obtain a visitor identification badge from TEN-TEN Security personnel prior to entering a limited access area and shall be escorted at all times by a Marijuana Establishment Agent authorized to enter the limited access area. The visitor identification badge shall be visibly displayed at all times. All visitors must be logged in and out and that log shall be available for inspection by the Commission at all times. All visitor identification badges shall be returned to TEN-TEN on exit.
(935 CMR 500.110(4)(e))

Individuals under the age of twenty-one (21) are not allowed on TEN-TEN's premises or in TEN-TEN's facilities. TEN-TEN shall employ security policies and procedures to ensure that individuals under the age of twenty-one (21) do not gain entry to TEN-TEN's premises and facilities.

All TEN-TEN premises and facilities shall have a sign posted at their entrances and exits that shall be a minimum of twelve inches by twelve inches (12" x 12") and which states in **bold** type: "**No one under twenty-one (21) years of age permitted. All persons shall present a valid, current government-issued photo identification card with a clearly visible, unaltered date of birth.**" in lettering no smaller than one inch (1") in height. Security personnel shall verify that the age of every visitor is twenty-one (21) years or older, and log information regarding the visitor, including but not limited to the visitor's name, contact information, and numbered visitor identification badge issued, time of arrival and departure, purpose of visit, facilities and areas to be accessed, the names of any employees visited, as well the names of the Marijuana Establishment Agent or Agents escorting the visitor. If the visitor is a regulatory agent, a law enforcement agent, or an emergency responder visiting TEN-TEN on a non-emergency basis, the visitors' log shall also reflect their badge number. The visitors' log shall be available for inspection by the Commission and law enforcement agencies at all times.

Parties at TEN-TEN Responsible for Ensuring that the Above is Enforced

Once TEN-TEN has achieved a sufficient volume of sales to justify the hiring of a Compliance Manager, the Compliance Manager shall be responsible for developing and maintaining a set of detailed written operating procedures, which shall specifically include the above processes, to ensure that individuals under twenty-one (21) years of age are not admitted to TEN-TEN's facilities, in accordance with 935 CMR 500.105(1) and 935 CMR 500.105(1)(p).

Until such time as TEN-TEN achieves a sufficient volume of sales to justify the hiring of a Compliance Manager, the TEN-TEN Security Manager shall be responsible for the responsibilities of the Compliance Manager.

ADDENDUM: This plan will be updated to reflect the most recent changes to 935 CMR 500 et.al. Regulations in effect at the time of Ten-Ten's request for Post Provisional License Inspection

RENEWAL 7-27-21

TEN-TEN's Marijuana and Marijuana Product Quality Control Processes, Product Safety Plans, and Testing Procedures

TEN-TEN LLC ("TEN-TEN") has developed marijuana and marijuana product quality control processes, product safety plans and testing procedures to ensure that TEN-TEN is compliant with all regulatory and legal requirements, including, but not limited to 935 CMR 500.101(1)(c), sanitary practices in compliance with 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements, 105 CMR 590.000: State Sanitary Code Chapter X – Minimum Sanitation Standards for Food Establishments, 310 CMR 7.00: Air Pollution Control, M.G.L. c. 94G, § 4(a½)(xxvi), 935 CMR 500.105, 935 CMR 500.130, 935 CMR 500.160, and 21 CFR 1.908(c) and that protect the safety of our customers, our surrounding community and our employees.

Pursuant to 935 CMR 500.105(3), TEN-TEN has developed the following requirements for the handling of marijuana:

TEN-TEN shall process marijuana in a safe and sanitary manner. TEN-TEN shall process the leaves and flowers of the female marijuana plant only, which shall be:

1. Well cured and free of seeds and stems;
2. Free of dirt, sand, debris, and other foreign matter;
3. Free of contamination by mold, rot, other fungus, pests and bacterial diseases and satisfying the sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food, and if applicable, 105 CMR 590.000: State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments;
4. Prepared and handled on food-grade stainless steel tables with no contact with bare hands; and
5. Packaged in a secure area.

TEN-TEN shall also comply with the following sanitary requirements:

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

b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.

3. Hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in TEN-TEN's production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Litter and waste shall be properly removed, disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
7. There shall be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
9. All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items shall not be stored in an area containing products used in the cultivation of marijuana. The Commission may require TEN-TEN to demonstrate the intended and actual use of any toxic items found on the premises;
11. TEN-TEN's public water supply shall be sufficient for necessary operations;
12. Plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout TEN-TEN's facilities. TEN-TEN's plumbing shall properly convey sewage and liquid disposable waste. There shall be no cross-connections between the potable and wastewater lines;
13. TEN-TEN shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. Products that can support the rapid growth of undesirable microorganisms shall be stored in a manner that prevents the growth of these microorganisms;
15. Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration

of finished products or their containers; and

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

In addition to the general operational requirements for TEN-TEN required under 935 CMR 500.105, pursuant to 935 CMR 500.130, TEN-TEN has developed the following additional requirements for the handling of marijuana products:

1. TEN-TEN's production of edible marijuana products shall take place in compliance with the following:
    a. All edible marijuana products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments, and with the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements; and
    b. Any Marijuana Product that is made to resemble a typical food or beverage product must be packaged and labelled as required by 935 CMR 500.105(5) and (6).
2. TEN-TEN shall meet all applicable environmental laws, regulations, permits and other applicable approvals including, but not limited to, those related to water quality and quantity, wastewater, solid and hazardous waste management and air pollution control, including prevention of odor and noise pursuant to 310 CMR 7.00: Air Pollution Control, and use additional best management practices as determined by the Commission in consultation with the working group established under St. 2017, c. 55, § 78(b) or applicable departments or divisions of the EOEEA to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts.
3. TEN-TEN, when selling or otherwise transferring marijuana and marijuana products to another marijuana establishment, shall provide documentation of its compliance, or lack thereof, with the testing requirements of 935 CMR 500.160, and the standards established by the Commission for the conditions, including time and temperature controls, necessary to protect marijuana and marijuana products against physical, chemical, and microbial contamination, as well as against deterioration of finished products during storage and transportation.
4. In addition to the written operating policies required under 935 CMR 500.105(1), TEN-TEN shall maintain written policies and procedures for the production and/or distribution of marijuana and marijuana products, as applicable, which shall include, but not be limited to:
    a. Methods for identifying, recording, and reporting diversion, theft, or loss, and for

correcting all errors and inaccuracies in inventories. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(8);

b. Policies and procedures for handling voluntary and mandatory recalls of marijuana and/or marijuana products. Such procedures shall be adequate to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by TEN-TEN to remove defective or potentially defective marijuana and/or marijuana products from the market, as well as any action undertaken to promote public health and safety;

c. Policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana and/or marijuana products are segregated from other product and destroyed. Such procedures shall provide for written documentation of the disposition of the marijuana and/or marijuana products. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(12);

d. Policies and procedures for transportation. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(13);

e. Policies and procedures to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(15);

f. Policies and procedures for the transfer, acquisition, or sale of marijuana and/or marijuana products between marijuana establishments;

g. Policies and procedures to ensure that all edible marijuana products are prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments, and with the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements; and

h. Policies and procedures for maintaining a product catalog identifying all types of marijuana products actively manufactured at the facility. The catalog shall include a description of the product, photograph or illustration, packaging design, and dosage amounts, including expected cannabinoid profile.

5. Notwithstanding a stricter municipal or state regulation, TEN-TEN shall identify the method of extraction (e.g., Butane, Propane, CO2) on a physical posting at all entrances. The posting shall be a minimum of 12" x 12" and identify the method of extraction in lettering no smaller than one inch in height. TEN-TEN shall also post a copy of a permit to keep, store, handle or otherwise use flammable and combustible gasses at each place of keeping, storing, handling or using such gasses within the facility.

6. Production of edible marijuana products shall take place in compliance with the following:

   a. Any edible marijuana product that is made to resemble a typical food or beverage

product must be packaged and labeled as required by M.G.L. c. 94G, § 4(a½)(xxvi), and 935 CMR 500.105(5) and (6).

b. The manufacture or sale of edibles in the following shapes and types is prohibited:

1. The distinct shape of a human, animal, or fruit; or
2. A shape that bears the likeness or contains characteristics of a realistic or fictional human, animal, or fruit, including artistic, caricature, or cartoon renderings.

c. Edible marijuana products that are geometric shapes and simply fruit-flavored are not considered fruit and are permissible.

7. Sanitary Requirements: All edible marijuana products shall be prepared, handled, and stored in compliance with the requirements in 935 CMR 500.105(3) and 935 CMR 500.105(11).
8. Additional labeling and packaging requirements for edible marijuana products:

a. In addition to the requirements set forth in M.G.L. c. 94G, § 4(a½)(xxvi), and 935 CMR 500.105(5) and (6), TEN-TEN shall ensure that the following information or statement is affixed to every container holding an edible earijuana product:

1. If the retail edible marijuana product is perishable or time and temperature controlled, a statement that the edible marijuana product must be refrigerated.
2. The date on which the edible marijuana product was produced.
3. A nutritional fact panel that must be based on the number of THC servings within the container.
4. Information regarding the size of each serving for the product by milligrams, the total number of servings of marijuana in the product, and the total amount of active THC in the product by milligrams (mgs). For example: "The serving size of active THC in this product is X mg(s), this product contains Y servings of marijuana, and the total amount of active THC in this product is (X*Y) mg(s)."
5. A warning that the impairment effects of edible marijuana may be delayed by two hours or more.

9. Once a label with a use-by date has been affixed to a container holding an edible marijuana product, TEN-TEN shall not alter that date or affix a new label with a later use-by date.
10. TEN-TEN shall ensure that each single serving of an edible marijuana product is physically marked in a way that enables a reasonable person to intuitively determine how much of the product constitutes a single serving of active THC.
11. Each serving of an edible marijuana product within a multi-serving package of edible marijuana products must be easily separable, in order to allow an average person twenty-one (21) years of age or older to physically separate, with minimal effort, individual servings of

the product.

12. Each single serving of an edible marijuana product contained in a packaged unit of multiple edible marijuana product shall be marked, stamped, or otherwise imprinted with a symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product.
13. TEN-TEN shall not prepare or deliver, sell or otherwise distribute an edible marijuana product with potency levels exceeding the following, as tested by an independent marijuana testing facility licensed in accordance with M.G.L. c. 94G, § 15:
    a. For a single serving of an edible marijuana product, five milligrams (5.00 mg) of active tetrahydrocannabinol (THC);
    b. In a single package of multiple edible marijuana product to be eaten, swallowed, or otherwise ingested, not more than twenty (20) servings or one hundred (100) milligrams (100.00 mg) of active THC; and
    c. The THC content must be homogenous, or evenly distributed throughout the edible marijuana product. A retail marijuana product shall be considered to not be homogenous if ten percent (10%) of the infused portion of the marijuana product contains more than twenty (20%) of the total THC contained within entire marijuana product.

Quality Control

TEN-TEN shall comply with the following sanitary requirements:

1. Any TEN-TEN agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 500.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any TEN-TEN agent working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including:
    a. Maintaining adequate personal cleanliness; and
    b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. TEN-TEN's hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in TEN-TEN's production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. TEN-TEN's facility shall have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;

5. TEN-TEN shall ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. TEN-TEN's floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
7. TEN-TEN's facility shall have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. TEN-TEN's buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
9. TEN-TEN shall ensure that all contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;
11. TEN-TEN shall ensure that its water supply is sufficient for necessary operations, and that such water supply is safe and potable;
12. TEN-TEN's plumbing shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing shall properly convey sewage and liquid disposable waste from the marijuana establishment. There shall be no cross-connections between the potable and waste water lines;
13. TEN-TEN shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. TEN-TEN shall hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. TEN-TEN shall store and transport finished products under conditions that shall protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

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

TEN-TEN shall ensure that TEN-TEN's facility is always maintained in a sanitary fashion and shall comply with all applicable sanitary requirements.

TEN-TEN shall follow established policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures are sufficient to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by TEN-TEN to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.
Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated shall be disposed of in accordance with the provisions of 935 CMR 500.105(12), and any such waste shall be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

TEN-TEN shall process marijuana in a safe and sanitary manner. TEN-TEN shall process the leaves and flowers of the female marijuana plant only, which shall be:

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

All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: Minimum Sanitation Standards for Food Establishments.

Testing

In compliance with 935 CMR 500.160(1), TEN-TEN shall not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as otherwise allowed under 935 CMR 500.000: Adult Use of Marijuana.

Pursuant to 935 CMR 500.160(1) testing of TEN-TEN's Marijuana Products shall be performed by an Independent Testing Laboratory in compliance with protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission including, but not limited to, the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products.

Pursuant to 935 CMR 500.160(1), testing of environmental media (e.g., soils, solid growing media, and water) shall be performed in compliance with the Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries published by the Commission.

Pursuant to 935 CMR 500.160(2), TEN-TEN's marijuana shall be tested for the cannabinoid profile and for contaminants, as specified by the Commission, including, but not limited to, mold, mildew, heavy metals, plant growth regulators, and the presence of pesticides. The Commission may require additional testing.

Pursuant to 935 CMR 500.160(3), TEN-TEN has a written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1).

Pursuant to 935 CMR 500.160(3)(a), TEN-TEN's policy includes, but is not limited to:

1. notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch.
2. notifying the Commission of any information regarding contamination as specified by the Commission or immediately upon request by the Commission.

Pursuant to 935 CMR 500.160(3)(b), TEN-TEN's policy requires the notification referred to above be from both TEN-TEN and the Independent Testing Laboratory, separately and directly.

Pursuant to 935 CMR 500.160(3)(c), TEN-TEN's policy requires the notification from TEN-TEN describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

Pursuant to 935 CMR 500.160(4), TEN-TEN shall maintain the results of all testing for no less than one year. Testing results shall be valid for a period of one year. Marijuana or marijuana products with testing dates in excess of one year old shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

Pursuant to 935 CMR 500.160(5), seeds sold by TEN-TEN is not subject to the above testing provisions.

Pursuant to 935 CMR 500.160(6), clones are subject to these testing provisions, but are exempt from testing for metals.

Pursuant to 935 CMR 500.160(7), all transportation of marijuana and marijuana products to and from Independent Testing Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13).

Pursuant to 935 CMR 500.160(8), any excess marijuana and/or marijuana products shall be disposed in compliance with 935 CMR 500.105(12), either by the independent testing laboratory returning the excess marijuana and/or marijuana products to TEN-TEN for disposal, or by the independent testing laboratory disposing of it directly.

Quality Control Standard Operating Procedures

TEN-TEN shall implement standard operating procedures (SOPs) relating to quality control processes to ensure product quality and safety. Once TEN-TEN's volume justifies the appointment of a Quality Assurance Manager, TEN-TEN shall appoint same, who shall be responsible for the development, implementation, oversight and updating, as necessary, of TEN-TEN's quality control processes.

In the interim, TEN-TEN's owner, Scot Trifilo, shall personally oversee TEN-TEN's on-site quality control processes, with the assistance of TEN-TEN's off-site independent testing laboratory. TEN-TEN's quality control and product safety processes shall incorporate employee, community, and customer product quality and safety considerations and shall require strict adherence in TEN-TEN's daily activities.

TEN-TEN's extensive quality control processes address a myriad of product safety requirements including, but not limited to, employee training requirements, proper equipment usage and equipment maintenance protocols, sanitation standards, cultivation protocols, component and product handling and storage, quality control testing, child-resistant packaging, product inserts, label disclosures and product traceability requirements.

TEN-TEN's SOPs shall be updated as often as necessary to ensure compliance with the laws and regulations that govern TEN-TEN. TEN-TEN's owner, Scot Trifilo, or his designate, with the support and input of his managers, shall be personally responsible for updating TEN-TEN's SOPs to incorporate any additions or amendments to the laws and regulations affecting TEN-TEN, as well as incorporating any guidance or directives published by regulatory agencies as they apply to TEN-TEN.

All employees shall be required to have proper training on the SOPs applicable to their duties. Each employee shall be required to demonstrate their understanding of the critical processes which apply to

their duties and responsibilities. Additionally, all third-party contractors shall be required, by contract, to perform their duties in compliance with TEN-TEN's policies and procedures and regulatory agency regulations.

Any employee or contractor who fails to perform their duties in compliance with TEN-TEN's policies and procedures and regulatory agency regulations shall be reprimanded and/or terminated, depending on the severity of the offense. All employees and contractors shall be required, as a condition of employment and/or contract, to report any observed compliance issues to the appropriate TEN-TEN manager.

ADDENDUM: This plan will be updated to reflect the most recent changes to 935 CMR 500 et.al. Regulations in effect at the time of Ten-Ten's request for Post Provisional License Inspection

RENEWAL 7-27-21

Overview of TEN-TEN's Personnel Policies including Background Checks

TEN-TEN LLC ("TEN-TEN") has established policies and procedures regarding recordkeeping and record retention in order to ensure the maintenance, safekeeping, and accessibility of critical documents.

To ensure confidentiality, written personnel records shall be stored in a locked area designated for record retention. Electronic records will be password protected and shall be stored on the TEN-TEN server, in on-site and off-site backup, and in the cloud, as necessary. All written and electronic records shall be available for inspection by the Commission upon request in compliance with 935 CMR 500.105(1).

The Personnel (Staffing) Records will be kept in compliance with 935 CMR 500.105(9)(d), including but not limited to, written and/or electronic records of:

- Job descriptions for each agent, as well as organizational charts consistent with the job descriptions;
- Personnel records for each marijuana establishment agent. Such records shall be maintained for at least twelve (12) months after termination of the agent's affiliation with TEN-TEN 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; and
    - Notice of completed responsible vendor and eight-hour related duty training.

TEN-TEN's Written Operating Policies and Procedures are in compliance with 935 CMR 500.105, and include, but are not limited to:

- TEN-TEN is an alcohol, smoke, and drug-free workplace, pursuant to 935 CMR 500.105(1)(k);
- Any TEN-TEN agent or employee shall be immediately terminated, pursuant to 935 CMR 500.105(1)(m), who has:
    - Diverted marijuana, which shall be reported to law enforcement authorities and to the Commission;
    - Engaged in unsafe practices with regard to TEN-TEN's operations, which shall be reported to the Commission; or
    - Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or alike violation in any other jurisdiction.
- TEN-TEN's job descriptions comply with 935 CMR 500.105(9)(d)(1);
- Background Checks: All agents, employees, and owners of TEN-TEN will undergo a detailed background investigation by the Cannabis Control Commission ("CCC") and/or TEN-TEN, prior to being granted access to a TEN-TEN facility or beginning work duties;
- TEN-TEN's Staffing plan is in compliance with 935 CMR 500.105(9)(d) and 935 CMR 500.105(1)(i):
    - Until licensed and in full operation, not all positions detailed below will be filled. Instead, a limited number of individuals will assume the responsibilities of the unfilled positions. The job descriptions for potential positions are provided below.
        - CULTIVATION (INDOOR) STAFFING PLAN:
            - Initially, four (4) individuals and eventually eight to ten employees, including a Cultivation Manager, Cultivation Associates, and required Security Personnel.
        - CULTIVATION (OUTDOOR) STAFFING PLAN:
            - Initially, the staff from the Indoor Cultivation will be utilized for the Outdoor growth as that will primarily be for Mothers plants to be exposed to natural sunlight, and required Security Personnel. Eventually, there will be six to eight employees for the Outdoor Cultivation in addition to
        - RETAIL STAFFING PLAN:
            - Six to eight employees to open the Retail Establishment including a Retail Manager, Retail Associates, and required Security Personnel.
        - PRODUCTION STAFFING PLAN:
            - Two to four employees to begin the Production Establishment including a Production Manager, Production Associate, and required Security Personnel.

Job Descriptions in compliance with 935 CMR 500.105(9)(d)(1):

Security Manager: Under the supervision of senior management, the Security Manager is responsible for the safety and security of TEN-TEN's owners; employees; agents; visitors,

vendors, and contractors while on TEN-TEN property; TEN-TEN's property, facilities, assets, inventory, raw materials, equipment, and waste; TEN-TEN's host community, as affected by TEN-TEN's safety and security. The Security Manager is also responsible for the development, implementation, administration, maintenance, and management of TEN-TEN's Security Policies and Procedures. The Security Manager supervises the security staff (once hired) and performs their duties and responsibilities until the security staff is hired, and subsequent to their hiring, as necessary. In addition, the Security Manager shall be responsible to:

- With the Human Resource Manager, ensure that TEN-TEN performs and maintains the records of the required background checks, in accordance with M.G.L c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, 803 CMR 2.00: Criminal Offender Record Information (CORI), and 935 CMR 500.105(9)(d)5.
- With the Retail Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.050(8)(b) and 935 CMR 500.140.
- With the Human Resources Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.105(1).
- With the Human Resources Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.105(2)(a) and (2)(b).
- With the Inventory Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.105(8).
- Ensure that TEN-TEN is in compliance with 935 CMR 500.110(1) or (2), 935 CMR 500.110(4) to 935 CRM 500.110(7), and 935 CMR 500.110(9) and (10).
- With the Retail Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.140(2).
- Ensure that TEN-TEN is in compliance with its Plan for Restricting Access to Age 21 or Older and update that plan as necessary.
- Ensure that TEN-TEN is in compliance with its Safety and Security Plan and update that plan as necessary.
- Ensure that TEN-TEN is in compliance with its Plan for Prevention of Diversion and update that plan as necessary.
- Ensure that TEN-TEN is in compliance with its Storage and Waste Disposal Plan and update that plan as necessary.
- Ensure that TEN-TEN is in compliance with its Shipping, Receiving and Transportation Plans and update those plans as necessary.
- Ensure that TEN-TEN is in compliance with its Inventory Procedures and update those procedures as necessary.
- Ensure that TEN-TEN is in compliance with its Retail Establishment Procedures and update those procedures as necessary.
- Ensure that TEN-TEN is in compliance with its Qualifications and Intended Trainings for Owners, Managers and Marijuana Establishment Agents and update as necessary.

- Ensure that TEN-TEN is in compliance with all safety and security requirements contained in the relevant CMRs and in TEN-TEN policies and procedures which are not referenced above and update TEN-TEN's policies and procedures as necessary.
- Develop, implement and update and health and safety policies, procedures, programs and responsibilities for the security agents.
- Train the security agents in the health and safety policies, procedures, programs and responsibilities for security staff.
- With the Human Resources Manager, assist the management staff in developing, implementing, updating and training staff in health and safety policies, procedures, and programs for their respective areas, ensure those policies, procedures, and programs are implemented and followed, including, but not limited to conducting regular and random health and safety checks.
- Hire, train, oversee, promote, discipline, and terminate security staff, with the assistance of Human Resources.
- Assume the responsibilities of the Inventory Manager and the Compliance Manager, until such time as TEN-TEN's business operations are of such size that TEN-TEN is able to fill those positions.
- Perform any and all other duties, as directed by senior management.

Security Agent: The duties and responsibilities identified below will be performed by the Security Manager until the Security staff has been hired, and, subsequent to their hiring, as necessary. Security staff supports the Security Manager in the performance of his or her duties, monitors TEN-TEN's security systems, including but not limited to the alarm and surveillance systems, and monitors and maintains the access control systems. Security staff are responsible for ensuring that only authorized individuals are permitted access to TEN-TEN's facilities by verifying ID cards and other forms of identification. In addition, security staff perform the following duties and any and all other duties, as assigned:

- Investigate, communicate, and provide leadership in the event of an emergency, such as an intrusion, fire, or other threat that jeopardizes TEN-TEN staff, agents, customers, visitors, vendors, and contractors and TEN-TEN'/s host community.
- Respond to and investigate security situations and alarm activations; clearly document any incidents in written reports.
- Oversee the entrance to TEN-TEN's facilities and verify the credentials of each person seeking access to TEN-TEN facilities.
- Manage the flow of staff, agents, customers, visitors, vendors, and contractors, including maintaining the visitor log and issuing and collecting visitor badges.
- Escort authorized visitors, vendors, and contractors while in restricted access areas.
- Answer routine inquiries.
- Perform security and health and safety checks at designated intervals and at random.

- Escort TEN-TEN agents, employees, visitors, vendors and contractors from TEN-TEN's facility to their vehicles during non-business hours.

Inventory Manager: The Inventory Manager is responsible for implementing inventory controls, maintaining inventories of in-process and finished marijuana and marijuana products using the BiotrackTHC (or its equivalent) and metrc systems on a day-to-day basis, as well as performing and/or overseeing the performance of the shift, daily, weekly, monthly, quarterly and annual inventory counts. The Inventory Manager is also responsible for maintaining inventories of raw materials, supplies, equipment, and physical assets. The Inventory Manager is responsible for labeling, tracking, and reporting on inventories of in-process and finished marijuana and marijuana products, as well as of raw materials, supplies, equipment, and physical assets. Further, the Inventory Manager is responsible for maintaining all records relating to TEN-TEN's inventory. Additionally, the Inventory Manager, along with the other Managers, is also responsible for ensuring the Commission's storage and waste disposal requirements are implemented and maintained. The Inventory Manager shall perform any and all other duties, as directed by senior management. In addition, the Inventory Manager shall be responsible to:

- With the Security Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.105(8).
- Ensure that TEN-TEN is in compliance with 935 CMR 500.105 (9), and (13).
- Ensure that TEN-TEN is in compliance with its Plan for Prevention of Diversion and update that plan as necessary.
- Ensure, with management counterparts, that TEN-TEN is in compliance with its Storage and Waste Disposal Plan and update that plan as necessary.
- Ensure that TEN-TEN is in compliance with its Shipping, Receiving and Transportation Plans, and update that plan as necessary.
- Ensure, along with management counterparts, that TEN-TEN is in compliance with its Inventory Procedures and update those procedures as necessary.
- Ensure, along with the Retail Manager, that TEN-TEN is in compliance with its Retail Establishment Procedures and update those procedures as necessary.
- Develop, implement, and update and health and safety policies, procedures, programs, and responsibilities for the inventory associates.
- Train the inventory associates in the health and safety policies, procedures, programs, and responsibilities for the inventory associates.
- Hire, train, oversee, promote, discipline, and terminate inventory associates, with the assistance of Human Resources.

Inventory Associate: Inventory associates support the Inventory Manager in the performance of his or her responsibilities.

Human Resources Manager: TEN-TEN's Human Resources (HR) Manager will support the senior management and the line managers to ensure effective implementation of all personnel policies and procedures for TEN-TEN, including TEN-TEN's hiring processes. The HR Manager will develop, implement, update, and enforce TEN-TEN's Personnel Policy Manual, and will ensure that TEN-TEN adheres to the policies herein. Until such time as TEN-TEN's businesses have grown large enough to support the hiring of an HR Manager, the HR responsibilities will be handled by Scot Trifilo, TEN-TEN's owner, or his designee. Additionally, the HR Manager will:

- With the Security Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.105(1).
- With the Security Manager, ensure that TEN-TEN is in compliance with 935 CMR 500.105(2)(a) and (2)(b).
- With the Security Manager, ensure that TEN-TEN performs and maintains the records of the required background checks, in accordance with M.G.L c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, 803 CMR 2.00: Criminal Offender Record Information (CORI), and 935 CMR 500.105(9)(d)5.
- Oversee hiring, training, promotions, management, disciplinary actions and terminations of TEN-TEN personnel.
- Ensure that TEN-TEN is in compliance with the Diversity Plan submitted to the Commission, and update that plan as necessary.
- Ensure that Ten-Ten is in compliance with the Plan to Positively Impact Areas of Disproportionate Impact submitted to the Commission and update that plan as necessary.
- Develop, implement and update trainings, training policies and training schedules for TEN-TEN's employees.
- With the Security Manager, assist the management staff in developing, implementing, updating and training staff in health and safety policies, procedures, and programs for their respective areas, ensure those policies, procedures and programs are implemented and followed, including, but not limited to conducting regular and random health and safety checks.
- Ensure compliance with any and all workplace laws, rules, and regulations, including but not limited to state and federal anti-discrimination statutes and Equal Employment Opportunity Commission (EEOC) requirements; state and federal leave laws and regulations; state and federal workplace safety laws and regulations, state and federal workers compensation laws and regulations; state and federal minimum wage requirements; and any and all other applicable local, state, or federal employment laws, rules, or regulations.
- Perform any and all other duties, as directed by senior management.

Cultivation Manager: TEN-TEN's Cultivation Manager will be responsible for the operations and maintenance of TEN-TEN's Indoor and Outdoor Cultivation facilities. Additionally, the Cultivation Manager will:

- Ensure, with the Production Manager, that TEN-TEN is in compliance with the Policies and Procedures for Cultivation submitted to the Commission and update those policies and procedures as necessary.
- Ensure, with the Production Manager, that TEN-TEN is in compliance with the general operational requirements under 935 CMR 500.105 and the additional operational requirements under 935 CMR 500.120.
- Ensure, with the Production Manager, that TEN-TEN is in compliance with the minimum energy and equipment standards as promulgated by the Commission.
- Ensure, with the Production Manager, that TEN-TEN is in compliance with the Marijuana and Marijuana Product Quality Control Processes, Product Safety Plans, and Testing Procedures submitted to the Commission and update those processes, plans and procedures as necessary.
- Ensure, with management counterparts, that TEN-TEN is in compliance with the Storage and Waste Disposal Plans submitted to the Commission and update those plans as necessary.
- Develop, implement, and update policies and procedures for the operations and maintenance of the cultivation facilities, including but not limited to the HVAC and dehumidification systems.
- Train the cultivation associates in the operations and maintenance of the cultivation facilities, including but not limited to the HVAC and dehumidification systems.
- Develop, implement and update health and safety policies, procedures, programs, and responsibilities for the indoor and outdoor cultivation facilities.
- Train the cultivation associates in the health and safety policies, procedures, programs, and responsibilities for the indoor and outdoor cultivation facilities.
- Develop, implement and update cleaning, maintenance, planting, irrigation, fertilization, pruning, trimming, potting, re-potting, integrated pest management (IPM), lighting and harvesting policies, procedures and schedules, and marijuana, soil and growth media testing policies, procedures and schedules.
- Train the cultivation associates in cleaning, maintenance, planting, irrigation, fertilization, pruning, trimming, potting, re-potting, integrated pest management (IPM), lighting and harvesting policies, procedures and schedules.
- Train the cultivation associates in marijuana, soil and growth media testing policies, procedures and schedules.
- With the Production Manager, develop, implement, and update policies and procedures to transition harvested plant material from the cultivation rooms to the trim room.
- Train the cultivation associates in the policies and procedures to transition harvested plant material from the cultivation rooms to the trim room.
- With the Production Manager, develop, implement, and update policies and procedures to ensure prompt transfer of marijuana trim to the production of pre-rolled joints.

- Train the cultivation associates in the policies and procedures to ensure prompt transfer of marijuana trim to the production of pre-rolled joints.
- Develop, implement, and update policies and procedures for storage and waste disposal for TEN-TEN's cultivation facilities.
- Train the cultivation associates in the policies and procedures for storage and waste disposal.
- Hire, train, oversee, promote, discipline and terminate cultivation staff, with the assistance of Human Resources.
- Coordinate with the Production Manager to ensure a steady flow of marijuana to meet TEN-TEN's needs.
- Maintain a database of information regarding indoor and outdoor cultivation environmental conditions, including but not limited to temperature, humidity, precipitation, irrigation, lighting, fertilization, pruning, trimming, potting, re-potting, pests and integrated pest management (IPM), and biological contaminants.
- Maintain a database of information regarding quantity and quality of indoor and outdoor harvests of flower and trim.
- Cross-reference the two databases to allow the Cultivation Manager, Production Manager and senior management to develop, implement and update the most effective strategies to produce the highest possible number and quality of crops, considering quality, quantity and consistency of flower and trim produced.
- Perform any and all other duties, as directed by senior management.

Cultivation Associate: Cultivation associates assist the Cultivation Manager in the performance of his or her responsibilities as above, as well as:

- Operate and maintain the cultivation facilities, including but not limited to the HVAC and dehumidification systems.
- Follow the health and safety policies, procedures, programs, and responsibilities for the indoor and outdoor cultivation facilities.
- Follow the cleaning, maintenance, planting, irrigation, fertilization, pruning, trimming, potting, re-potting, integrated pest management (IPM), lighting and harvesting policies, procedures and schedules.
- Follow the marijuana, soil and growth media testing policies, procedures and schedules.
- Follow the policies and procedures for storage and waste disposal.
- Perform all other duties as assigned.

Production Manager Marijuana and Production Manager Marijuana Products: For the purposes of this policy, the duties and responsibilities of the Production Manager for Marijuana and those of the Production Manager for Marijuana Products are combined. TEN-TEN, at its option, may choose to divide those duties and responsibilities, based on TEN-TEN's business

needs. The Production Manager is responsible for all post-harvest handling of marijuana and the manufacturing of all marijuana products. The Production Manager coordinates with the Cultivation Manager to ensure a steady flow of marijuana to meet TEN-TEN's needs. The Production Manager will be responsible for the: operation and maintenance of TEN-TEN's trim room and drying room; marijuana packaging; pre-rolled joints and packaging of pre-rolled joints; and marijuana product production and marijuana product packaging, as well as will:

- Ensure, with the Cultivation Manager, that TEN-TEN is in compliance with the Policies and Procedures for Cultivation submitted to the Commission and update those policies and procedures as necessary.
- Ensure, with the Cultivation Manager, that TEN-TEN is in compliance with the general operational requirements under 935 CMR 500.105 and the additional operational requirements under 935 CMR 500.120.
- Ensure, with the Cultivation Manager, that TEN-TEN is in compliance with the minimum energy and equipment standards as promulgated by the Commission.
- Ensure, with the Cultivation Manager, that TEN-TEN is in compliance with the Marijuana and Marijuana Product Quality Control Processes, Product Safety Plans, and Testing Procedures submitted to the Commission and update those processes, plans and procedures as necessary.
- Ensure, with management counterparts, that TEN-TEN is in compliance with the Storage and Waste Disposal Plans submitted to the Commission and update those plans as necessary.
- Ensure that TEN-Ten is in compliance with the Types of Products Manufactured and the Methods to Produce Products submitted to the Commission and update those submissions as necessary.
- Develop, implement, and update policies and procedures for the operations and maintenance of the trim room and drying room, including maintaining a sterile environment and safe use of mechanical and manual marijuana trimmers.
- Train the production associates in the policies and procedures for the operations and maintenance of the trim room and drying room, including maintaining a sterile environment and safe use of mechanical and manual marijuana trimmers.
- Develop, implement and update health and safety policies, procedures, programs, and responsibilities for production facilities.
- Train the production associates in the health and safety policies, procedures, programs, and responsibilities for production facilities.
- Develop, implement and update a rigid cleaning schedule for production facilities, to ensure and maintain product quality.
- Train the production associates in the rigid cleaning schedule for production facilities, to ensure and maintain product quality.
- With the Cultivation Manager, develop, implement, and update policies and procedures to transition harvested plant material from the cultivation rooms to the trim room.

- Train the production associates in the policies and procedures to transition harvested plant material from the cultivation rooms to the trim room.
- With the Cultivation Manager, develop, implement, and update policies and procedures to ensure prompt transfer of marijuana trim to the production of pre-rolled joints.
- Train the production associates in the policies and procedures to ensure prompt transfer of marijuana trim to the production of pre-rolled joints.
- Develop, implement, and update policies and procedures for trimming marijuana manually and mechanically.
- Train the production associates in the policies and procedures for trimming marijuana manually and mechanically.
- Develop, implement, and update policies and procedures to maintain and ensure quality control of finished flower.
- Train the production associates in the policies and procedures to maintain and ensure quality control of finished flower.
- Develop, implement, and update policies and procedures to monitor the status of the drying room and of the marijuana flowers that are in the process of drying.
- Train the production associates in the policies and procedures to monitor the status of the drying room and of the marijuana flowers that are in the process of drying.
- Develop, implement, and update policies and procedures to enter wet and dry weights of all product, including flower and trim, into BiotrackTHC (or its equivalent) and metrc.
- Train the production associates in policies and procedures to enter wet and dry weights of all product, including flower and trim, into BiotrackTHC (or its equivalent) and metrc.
- Develop, implement, and update policies and procedures for bulk packaging of flower and trim, and storage in the dedicated vault.
- Train the production associates in policies and procedures for bulk packaging of flower and trim, and storage in the dedicated vault.
- Develop, implement, and update policies and procedures for the preparation of trim for the rolling of pre-rolled joints and the manufacture of pre-rolled joints.
- Train the production associates in the policies and procedures for the preparation of trim for the rolling of pre-rolled joints and the manufacture of pre-rolled joints.
- Develop, implement, and update policies and procedures for storage and waste disposal for TEN-TEN's production facilities.
- Train the production associates in the policies and procedures for storage and waste disposal.
- Develop, implement, and update policies and procedures for the creation of marijuana products, including, but not limited to creating raw Super Critical CO2 (SCCO2) concentrate and creating distilled, high-purity concentrate, in accordance with the Types of Products Manufactured and the Methods to Produce Products submitted to the Commission, updating those submissions as necessary.

- Train the production associates in policies and procedures to create marijuana products, including, but not limited to creating raw Super Critical CO2 (SCCO2) concentrate and creating distilled, high-purity concentrate.
- Develop, implement, and update policies and procedures to manage inventory and periodic automatic replenishment (PAR) levels of all concentrate and marijuana products, including integration into BiotrackTHC (or its equivalent) and metrc.
- Train the production associates in policies and procedures to manage inventory and periodic automatic replenishment (PAR) levels of all concentrate and marijuana products, including integration into BiotrackTHC (or its equivalent) and metrc.
- Develop, implement, update and maintain an extraction schedule, based on the availability of marijuana flower and trim.
- Hire, train, oversee, promote, discipline and terminate production staff, with the assistance of Human Resources.
- Perform all other duties as assigned by senior management.

Production Staff: Production associates assist the Production Manager in the performance of his or her responsibilities as above, as well as:

- Operating and maintaining the production facilities, including but not limited to the trim room, drying room and production rooms, including maintaining a sterile environment and safe use of mechanical and manual marijuana trimmers.
- Drying and grinding cultivated material in preparation for SCCO2 extraction.
- Unpacking and cleaning the SCCO2 extractor.
- Cleaning and sanitization of all glassware, kitchen cookware and utensils, and the distillation still.
- Performing scheduled maintenance on all equipment.
- Packaging completed marijuana product and concentrates.
- Following the health and safety policies, procedures, programs, and responsibilities for the production facilities.
- Following the cleaning and maintenance policies, procedures and schedules.
- Following the policies and procedures for storage and waste disposal.
- Performing all other duties as assigned.

Retail Manager: The Retail Manager is responsible for operating and maintaining TEN-TEN's Retail Establishment. Additionally, the Retail Manager will:

- Ensure TEN-TEN is in compliance with the Retail Establishment Procedures submitted to the Commission and update those procedures as necessary.
- Ensure that TEN-TEN is in compliance with the Plan for Restricting Access to TEN-TEN's Marijuana Retail Store to Consumers Age Twenty-one (21) and Older submitted to the Commission and update that plan as necessary.

- Ensure that TEN-TEN is in compliance with the Plan for Prevention of Diversion submitted to the Commission and update that plan as necessary.
- Ensure that TEN-TEN's Retail Vault is in compliance with the Storage and Waste Disposal Plan submitted to the Commission and update that portion of the plan as necessary.
- Ensure, along with the Inventory Manager, that TEN-TEN is in compliance with the Inventory Procedures submitted to the Commission and update those procedures as necessary.
- Ensure that TEN-TEN is in compliance with the Records related to Recording Sales portion of the Recordkeeping Policies and Procedures submitted to the Commission and update that portion of those policies and procedures as necessary.
- Ensure TEN-TEN is in compliance with the General Requirements of a Marijuana Retailer under 935 CMR 500.050(8), the additional requirements under 935 CMR 500.101(3)(e),the Marketing and Advertising Requirements under 935 CMR 500.105(4) and (6), the Cash Handling and Transportation Requirements under 935 CMR 500.110(7), the Additional Operational Requirements for Retail Sale under 935 CMR 500.140, the requirements set forth in M.G.L. c. 94G, § 4(a½)(xxvi), the Marketing and Advertising Requirements under 935 CMR 500.105(6), the Additional Labeling and Packaging Requirements for Edible Marijuana Products under 935 CMR 500.150(3), and the Dosing Limitations for Edible Marijuana Products under 935 CMR 500.150(4).
- Develop, implement, and update policies and procedures to ensure that TEN-TEN's Retail Establishment is in compliance with the above, including but not limited to policies and procedures for the day-to-day operations of TEN-TEN's Retail Establishment.
- Train the retail staff in the policies and procedures developed, implemented and updated in accordance with the above, to ensure TEN-TEN's Retail Establishment is in compliance with the above, including but not limited to policies and procedures for the day-to-day operations of TEN-TEN's Retail Establishment.
- Develop, implement and update and health and safety policies, procedures, programs and responsibilities for the retail staff.
- Train the retail staff in the health and safety policies, procedures, programs and responsibilities for the retail staff.
- Develop, implement and update policies and procedures to ensure that retail associates are knowledgeable regarding all of the products offered by TEN-TEN, including but not limited to flower, pre-rolled joints, concentrates, extracts, tinctures, and edibles, including but not limited to their strains, use, potency, active tetrahydrocannabinol (THC) levels, dosing, labeling, packaging, and paraphernalia required for use.
- Train the retail staff in the policies and procedures to ensure that they are knowledgeable regarding all of the products offered by TEN-TEN, including but not limited to flower, pre-rolled joints, concentrates, extracts, tinctures, and edibles, including but not limited to their strains, use, potency, active tetrahydrocannabinol (THC) levels, dosing, labeling, packaging, and paraphernalia required for use.

- Develop, implement and update policies and procedures to ensure that products are properly displayed and merchandised, while maintaining product security in compliance with Commission requirements.
- Train the retail staff in the policies and procedures to ensure that products are properly displayed and merchandised, while maintaining product security in compliance with Commission requirements.
- Develop, implement and update policies and procedures to ensure that each retail customer is treated with respect and receives the appropriate amount of individualized attention in order to address his/her specific needs and questions, including active listening to ensure understanding of customer needs.
- Train the retail staff in the policies and procedures to ensure that ensure that each retail customer is treated with respect and receives the appropriate amount of individualized attention in order to address his/her specific needs and questions, including active listening to ensure understanding of customer needs.
- Develop, implement and update policies and procedures to ensure that all transactions are properly weighed, packaged, recorded and entered into the point-of-sale (POS) system, BiotrackTHC (or its equivalent) and metrc.
- Train the retail staff in the policies and procedures to ensure that all transactions are properly weighed, packaged, recorded and entered into the point-of-sale (POS) system, BiotrackTHC (or its equivalent) and metrc.
- Develop, implement and update policies and procedures to ensure that all cash is properly handled, and credit card transactions are properly authorized and processed.
- Train the retail staff in the policies and procedures to ensure that all cash is properly handled, and credit card transactions are properly authorized and processed.
- Develop, implement and update retail sales plans, including sales and gross margin plans by department, product classification, product and retail associate to ensure sufficient sales, profits and inventory.
- Report hourly, daily, weekly, monthly, seasonal and annual retail sales and gross margin performance vs. plan to senior management, including sales and gross margin by department, product classification, product and retail associate.
- Evaluate hourly, daily, weekly, monthly, seasonal and annual retail sales and gross margin performance vs. plan, including sales and gross margin by department, product classification, product and retail associate, and make recommendations to senior management accordingly.
- Train the retail staff to review and evaluate their sales and gross margin performance vs. plan and to adjust their behaviors accordingly.
- Develop, implement and update opening, closing and shift change plans, and ensure that the retail staff follow the appropriate plans.
- Train the retail staff to follow the appropriate opening, closing and shift change plans.

- Supplement the retail staff, as required by customer volume, staff vacations, and/or staff absences.
- Based on sales plans and sales performance, develop and implement retail staffing plans to maximize coverage and minimize expense.
- Hire, train, oversee, promote, discipline and terminate retail staff, with the assistance of Human Resources.
- Develop, implement, and update policies and procedures to ensure customer satisfaction.
- Train the retail staff in the policies and procedures to ensure customer satisfaction.
- Develop and implement feedback tools to determine levels of customer satisfaction, and share the results with retail staff, managers and senior management.
- Interact with dissatisfied customers to ensure their satisfaction; document each interaction for feedback and additional training for the retail staff involved and transmit the documentation to Human Resources and senior management, as appropriate.
- Interact with satisfied customers who wish to share their satisfaction; document each interaction for feedback with the retail staff involved and transmit the documentation to Human Resources and senior management, as appropriate.
- Perform all other duties as assigned by senior management.

Retail Associate: Retail associates assist the Retail Manager in the performance of his duties as above that ensure that each retail customer is treated with respect and receives the appropriate amount of individualized attention in order to address his/her specific needs and questions. Retail associates' responsibilities include, but are not limited to:

- Maintaining a clean, safe, healthy, and productive environment ensuring that customers have a positive experience at TEN-TEN's retail establishment.
- Assisting the Retail Manager in dealing with any dissatisfied customers.
- Becoming knowledgeable regarding all of the products offered by TEN-TEN, including but not limited to: flower, pre-rolled joints, concentrates, extracts, tinctures, and edibles, including but not limited to their strains, use, potency, active tetrahydrocannabinol (THC) levels, dosing, labeling, packaging, and paraphernalia required for use.
- Actively listening to ensure understanding of customer needs, and answer customer questions regarding products including, but not limited to: flower, pre-rolled joints, concentrates, extracts, tinctures, and edibles, including but not limited to their use, potency, active tetrahydrocannabinol (THC) levels, dosing, labeling, packaging, and paraphernalia required for use.
- Maintaining and enhancing product display and merchandising, in accordance with TEN-TEN policies and procedures, while maintaining product security in compliance with Commission requirements.
- Ensuring that all transactions are properly weighed, packaged, recorded and entered into the point-of-sale (POS) system, BiotrackTHC (or its equivalent) and metrc.

- Ensuring that all cash is properly handled, and that credit card transactions are properly authorized and processed.
- Reviewing and evaluating individual sales and gross margin performance vs. plan and adjusting individual behaviors accordingly.
- Learning and following the appropriate health and safety policies and procedures.
- Learning and following the appropriate opening, closing and shift change plans.
- Participating in ongoing training and professional development as required.
- Performing all other duties as assigned.

ADDENDUM: This plan will be updated to reflect the most recent changes to 935 CMR 500 et.al. Regulations in effect at the time of Ten-Ten's request for Post Provisional License Inspection

RENEWAL 7-27-21
TEN-TEN's Recordkeeping Policies and Procedures

General Overview

TEN-TEN LLC ("TEN-TEN") has established policies and procedures regarding recordkeeping and record retention in order to ensure the maintenance, safekeeping, and accessibility of critical documents. Written records shall be stored in a locked room designated for record retention. Electronic records shall be stored on the TEN-TEN server, in on-site and off-site backup, and in the cloud, as necessary. All written and electronic records shall be available for inspection by the Commission upon request.

Recordkeeping in compliance with 935 CMR 500.105(9):

Written records that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the records identified below.

To ensure that TEN-TEN maintains and retains all records as required by this policy, a review by management of Corporate Records, Business Records, Personnel Records, and Financial Records to ensure completeness, accuracy, and timeliness of said records shall occur quarterly. Financial recordkeeping is addressed in a separate section of the Management and Operations Profile.

In addition, TEN-TEN's operating policies and procedures shall be updated, as needed, on an ongoing basis, and undergo a review by management on an annual basis. Updated policies and procedures shall be provided to the Commission pursuant to 935 CMR 500.104(2).

TEN-TEN's records include, but are not limited to:

- Corporate Records, which are those records may require, at a minimum, annual reviews, updates, and renewals, including but not limited to:
    - Insurance:
        - Directors & Officers Policies
        - Product Liability Policies
        - General Liability Policies
        - Umbrella Policies
        - Workers Compensation Policies
        - Employer Professional Liability Policies
        - Motor Vehicle Policies
        - All other policies, as necessary

        - Certificates of insurance naming TEN-TEN as an additional insured
    - Third-Party Testing Laboratory Contracts
    - Contracts for the Purchase and/or Sale of Marijuana and Marijuana Products
    - Transportation Contracts
    - All other contracts
    - Commission Requirements:
        - Annual Agent Registration
        - Annual Marijuana Establishment Registration
        - Policies and Procedures
    - Local Compliance:
        - Host Community Agreements
        - Certificates of Occupancy
        - Special Permits
        - Variances
        - Site Plan Approvals
        - As-Built Drawings
    - Corporate Governance:
        - Annual Reports
        - Secretary of State Filings

- Business Records in compliance with 935 CMR 500.105(9)(e), including but not limited to, written and/or electronic 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 wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment.

- Personnel Records in compliance with 935 CMR 500.105(9)(d), including but not limited to, written and/or electronic records of:
    - Job descriptions for each agent, as well as organizational charts consistent with the job descriptions;
    - Personnel records for each marijuana establishment agent. Such records shall be maintained for at least twelve (12) months after termination of the

agent's affiliation with TEN-TEN 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; and
- Notice of completed responsible vendor and eight-hour related duty training.

- A staffing plan that demonstrates accessible business hours and safe cultivation conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with M.G.L c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: Criminal Offender Record Information (CORI).

- Records of Testing of marijuana and marijuana products in compliance with 935 CMR 500.160(3).

- Inventory Records in compliance with 935 CMR 500.105(8)(b), including but not limited to:
  - Real-time inventory 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 in-progress and finished marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
  - 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 agents who conducted the inventory.

- Seed-to-Sale Tracking Records in compliance with 935 CMR 500.105(9)(c) and as required by 935 CMR 500.105(8)(e).

- Incident Reporting Records in compliance with 935 CMR 500.110(9), including, but not limited to:
    - Written notice provided to the Commission by TEN-TEN within ten (10) calendar days of any incident described in 935 CMR 500.110(9)(a), by an incident report, in the form and manner prescribed by the Commission, which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified.
    - All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) shall be maintained by TEN-TEN for not less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within their lawful jurisdiction on request.

- Waste Disposal Records in compliance with 935 CMR 500.105(9)(f) & in compliance with 935 CMR 500.105(12)(d), including, but not limited to:
    - When marijuana, marijuana products or waste are disposed of or handled, TEN-TEN shall create and maintain an 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 TEN-TEN agents present during the disposal or handling, with their signatures. TEN-TEN shall keep these records for at least three (3) years. This period shall automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

- Security Records in compliance with 935 CMR 500.110, including, but not limited to:
    - 935 CMR 500.110(4)(e): All outside vendors, contractors and visitors shall obtain a visitor identification badge prior to entering a limited access area and shall be escorted at all times by a TEN-TEN agent authorized to enter the limited access area. All visitors must be logged in and out and that log shall be available for inspection by the Commission at all times.
    - 935 CMR 500.110(5)(a)(5): Recordings from all video cameras which shall be enabled to record 24 hours each day and be available for immediate viewing by the Commission on request for at least the preceding 90 calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission,

whichever is longer. Video cameras may use motion detection sensors to begin recording, so long as the motion detection sensor system provides an alert to designated employees of TEN-TEN in a manner established in TEN-TEN's written security procedures and approved by the Commission or a Commission Delegee. If a TEN-TEN receives notice that the motion detection sensor is not working correctly, it must take prompt action to make corrections and document those actions. Recordings shall not be destroyed or altered, and shall be retained as long as necessary if TEN-TEN is aware of a pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.

    - 935 CMR 500.110(5)(b) and 935 CMR 500.110(6)(b): All security system equipment and recordings shall be maintained in a secure location so as to prevent theft, loss, destruction and alterations.
    - 935 CMR 500.110(5)(e) and 935 CMR 500.110(6)(d): A current list of authorized agents and service personnel that have access to the surveillance room shall be made available to the Commission upon request.
    - 935 CMR 500.110(6)(a)(5): 24-hour recordings from all video cameras that are available for immediate viewing by the Commission on request and that are retained for at least ninety (90) calendar days. Recordings shall not be destroyed or altered, and shall be retained as long as necessary if TEN-TEN is aware of a pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.
    - All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) shall be maintained by TEN-TEN for not less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within their lawful jurisdiction on request.

- Transportation Records in compliance with 935 CMR 500.105(13), including, but not limited to:
    - 935 CMR 500.105(13)(a)(11): In the case of an emergency stop during the transportation of marijuana and marijuana products, a log must be maintained describing the reason for the stop, the duration, the location, and any activities of personnel exiting the vehicle.
    - 935 CMR 500.105(13)(b)(1): TEN-TEN agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than twenty-four (24) hours following the discovery of such a discrepancy.

    - 935 CMR 500.105(13)(b)(2): TEN-TEN agents shall report to the Commission and Law Enforcement Authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than twenty-four (24) hours following such accidents, diversions, losses, or other reportable incidents.
    - 935 CMR 500.105(13)(c)1: Records that a vehicle used for transporting marijuana and marijuana products is owned or leased by TEN-TEN and properly registered, inspected, and insured in the Commonwealth, which shall be made available to the Commission on request.
    - 935 CMR 500.105(13)(e)8: The originating location must have a Marijuana Establishment Agent assigned to monitoring the GPS unit and secure form of communication, who must log all official communications with TEN-TEN agents transporting marijuana products.
    - 935 CMR 500.105(13)(f)(5): TEN-TEN shall retain all transportation manifests for no less than one (1) year and make them available to the Commission upon request.

- Records of Responsible Vendor Training in compliance with 935 CMR 500.105(2)(b)5, including, but not limited to:
    - TEN-TEN shall maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.

- Records following closure, in compliance with 935 CMR 500.105(9)(g), including, but not limited to:
    - All records shall be kept for at least two (2) years at TEN-TEN's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, TEN-TEN shall communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.

- Written Operating Policies and Procedures in compliance with 935 CMR 500.105, including but not limited to:
    - Written Operating Procedures: TEN-TEN shall have and follow a set of detailed written operating procedures which shall be updated on an ongoing basis, as necessary and undergo a review by management on an annual basis.
    - Operating procedures shall include, but need not be limited to the following:

- Security measures in compliance with 935 CMR 500.110;
- Emergency policies and procedures for securing all product following any instance of diversion, theft or loss of marijuana and marijuana products, and conduct an assessment to determine whether additional safeguards are necessary, in compliance with 935 CMR 500.110(1)(m);
- Employee security policies, including personal safety and crime prevention techniques;
- A description of TEN-TEN's hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement authorities on request, and updated pursuant to 935 CMR 500.000;
- Storage and waste disposal of marijuana and marijuana products in compliance with 935 CMR 500.105(11);
- Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
- Price lists for marijuana and marijuana products and any other available products;
- Procedures to ensure accurate recordkeeping, including inventory protocols for transfer and inventory in compliance with 935 CMR 500.105(8) and (9);
- Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- Alcohol, smoke, and drug-free workplace policies;
- A plan describing how confidential information and other records required to be maintained confidentially will be maintained;
- A policy for the immediate dismissal of any TEN-TEN agent or employee who has:
    - Diverted marijuana, which shall be reported to law enforcement authorities and to the Commission;
    - Engaged in unsafe practices with regard to TEN-TEN's operations, which shall be reported to the Commission; or
    - Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the

Commonwealth, or a like violation in any other jurisdiction.

- Policies and procedures for the handling of cash on TEN-TEN's premises including, but not limited to, storage, collection frequency, and transport to financial institution(s), to be available on inspection;
- Policies and procedures to prevent the diversion of marijuana and marijuana products to individuals younger than twenty-one (21) years old;
- 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;
  - 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;
  - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
  - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.

- An operational plan for the cultivation of marijuana, including a detailed summary of the policies and procedures for cultivation, consistent with state and local law including, but not limited to, the Commission's Guidance on Integrated Pest Management effective November 1, 2019.

- Written policies and procedures for the cultivation, production, transfer or distribution of marijuana and marijuana products, as applicable, which shall include but not be limited to:
    - Methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(8);
    - Policies and procedures for handling voluntary and mandatory recalls of marijuana and marijuana products. Such procedures shall be adequate to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by TEN-TEN to remove defective or potentially defective marijuana or marijuana products from the market, as well as any action undertaken to promote public health and safety;
    - Policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana or marijuana product is segregated from other marijuana and marijuana products and destroyed. Such procedures shall provide for written documentation of the disposition of the marijuana and marijuana products. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(12).
    - Policies and procedures for transportation. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(13);
    - Policies and procedures to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(15).
    - Policies and procedures for the transfer, acquisition, or sale of marijuana and marijuana products between Marijuana Establishments;
    - Policies and procedures to ensure that all marijuana products are prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments, and with the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements; and
    - Policies and procedures for maintaining a product catalogue identifying all types of marijuana products actively manufactured

at the facility. The catalog shall include a description of the product, photograph or illustration, packaging design, and dosage amounts, including expected cannabinoid profile.

- Records related to Recording Sales, in compliance with 935 CMR 500.140(5)(d), 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements, including, but not limited to:
    - A retailer shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. A marijuana retailer shall maintain records that it has performed the monthly analysis and produce it on request to the Commission.

ADDENDUM: This plan will be updated to reflect the most recent changes to 935 CMR 500 et.al. Regulations in effect at the time of Ten-Ten's request for Post Provisional License Inspection

RENEWAL 7-27-21

TEN-TEN's Maintenance of Financial Records

TEN-TEN LLC.'s ("TEN-TEN") operating policies and procedures ensure financial records are accurate and maintained in compliance with 935 CMR 500.105(9)(e). Financial records maintenance measures include policies and procedures requiring that:

- Confidential information shall be maintained in a secure location, kept separate from all other records, and shall not be disclosed without the written consent of the individual to whom the information applies, or as required under law, or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
    - Maintaining financial records in accordance with generally accepted accounting principles, consistently applied; and
    - Keeping written business records available for inspection by the Commission, on request, including but not limited to all records required in any section of 935 CMR 500.000, in addition to 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; and
        - Salary and wages paid to each employee and any executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over TEN-TEN.
- All sales recording requirements under 935 CMR 500.140(5) are followed, including:
    - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
    - Ensuring that sales data is not manipulated or altered;
    - Conducting a monthly analysis of TEN-TEN's equipment and sales data to determine that no software has been installed that could be utilized to

manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data;
    - Maintaining records that TEN-TEN has performed the monthly analysis and produce them on request to the Commission;
    - If TEN-TEN determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:
        - TEN-TEN shall immediately disclose the information to the Commission;
        - TEN-TEN shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
        - TEN-TEN shall take such other action directed by the Commission to comply with 935 CMR 500.105.
    - Complying with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements;
    - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;
    - Allowing the Commission and the DOR to audit and examine the point-of-sale system used by TEN-TEN in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000.
- Additional written business records shall be kept, including, but not limited to, records of:
    - Compliance with liability insurance coverage under 935 CMR 500.105(10);
    - Compliance with surety bond or escrow requirements under 935 CMR 500.105(16);
    - Fees paid under 935 CMR 500.005 or under any other section of the Commission's regulations; and
    - Fines or penalties, if any, paid under 935 CMR 500.550 or under any other section of the Commission's regulations.

TEN-TEN LLC
2021 Provisional Renewal
STATUS ON DIVERSITY PLAN

TEN-TEN, LLC (hereinafter "TEN-TEN") does not currently have any employees.

TEN-TEN's management upon initial request for licensure was the single owner, who is a white male. Upon this renewal of TEN-TEN's Provisional License no other entity or person has obtained ownership or control.

Progress on Diversity Plan

TEN-TEN has engaged one service provider that is a certified woman owned business.

ADDENDUM: This plan will be updated to reflect the most recent changes to 935 CMR 500 et.al. Regulations in effect at the time of Ten-Ten's request for Post Provisional License Inspection

RENEWAL 7-27-21

TEN-TEN's Qualifications and Intended Trainings for Owners, Managers and Marijuana Establishment Agents

Pursuant to 935 CMR 500.101(1)(c)9, TEN-TEN LLC ("TEN-TEN") provides below a detailed description of the minimum qualifications and intended training(s) for marijuana establishment agents who shall be employees.

Minimum Qualifications

Pursuant to 935 CMR 500.030(1), all employees of TEN-TEN shall:

(a) be 21 years of age or older;

(b) have not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of Other Jurisdictions; and

(c) be determined suitable for registration consistent with the provisions of 935 CMR 500.802.

Pursuant to 935 CMR 500.802, all employees of TEN-TEN shall meet the suitability standards for registration as a marijuana establishment agent for a marijuana retail establishment, as these are the most stringent suitability standards:

(1) In accordance with M.G.L. c. 94G, § 4(a½)(iii), the Commission has established qualifications for licensure and minimum standards for employment that are directly and demonstrably related to the operation of a marijuana establishment and similar to qualifications for licensure and employment standards in connection with alcoholic beverages as regulated under M.G.L. c. 138; provided, that a prior conviction solely for a marijuana-related offense or for a violation of M.G.L. c. 94C, § 34 shall not disqualify an individual or otherwise affect eligibility for employment or licensure in connection with a marijuana establishment, unless the offense involved the distribution of a controlled substance, including marijuana, to a minor.

(2) For purposes of determining suitability based on background checks in accordance with 935 CMR 500.030 and 935 CMR 500.101:

(a) All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of other jurisdictions.

(b) All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy and solicitation.

(c) 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 included in 935 CMR 500.801: Table B commence on the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look back period shall commence on release from incarceration.

(e) Unless otherwise specified in 935 CMR 500.801: Table B, a criminal condition, offense or violation 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. All suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, the Commission shall:

1. Consider whether offense(s) or information that would result in a presumptive negative suitability determination under 935 CMR 500.801: Table B renders the subject unsuitable for registration; and
2. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 803 CMR 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS.

(3) 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 500.801: Table B within ten (10) days of such individual's arrest or summons, and within ten (10) days of the disposition on the merits of the underlying charge. Failure to make proper notification to the Commission may be grounds for disciplinary action. If the Commission lawfully finds a disqualifying event and the individual asserts that the record was sealed, the Commission may require the individual to provide proof from a court evidencing the sealing of the case.

Table B: Retail, Delivery-only Licensee or a Marijuana Establishment with a Delivery Endorsement, Social Consumption Establishment, and Transporter Marijuana Establishment Agents. Shall apply solely to applicants for registration as a Marijuana Establishment Agent at a Marijuana Establishment licensed pursuant to 935 CMR 500.100, as a Marijuana Retailer, Delivery-only Licensee or a Marijuana Establishment with a Delivery Endorsement, Social Consumption Establishment, or as a Marijuana Transporter, under 935 CMR 500.050.

Time Period	Precipitating Issue	Result
Present (during time from start of application process through action on application or renewal.)	**Open/Unresolved Criminal Proceedings:** Any outstanding or unresolved criminal proceeding, the disposition of which may result in a felony conviction under the laws of the Commonwealth or Other Jurisdictions, but excluding any criminal proceeding based solely on a Marijuana-related offense or a violation of M.G.L. c. 94C, § 32E(a) or § 34.	Presumptive Negative Suitability Determination
Present	**Open Professional or Occupational License Cases**	Presumptive Negative Suitability Determination
Present	**Open/Unresolved Marijuana License or Registration Violations (Massachusetts or Other Jurisdictions):** An outstanding or unresolved violation of the regulations as included in 935 CMR 500.000 or a similar statute or regulations of an Other Jurisdiction, which has either (a) remained unresolved for a period of six months or more; or (b) the nature of which would result in a determination of unsuitability for registration.	Presumptive Negative Suitability Determination

	Submission of Untruthful Information to the Commission Including, but Not Limited to: Submission of information in connection with an agent application, waiver request or other Commission action that is deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly, or by omission or ambiguity; or making statements during or in connection with a Commission inspection or investigation that are deceptive, misleading, false or fraudulent, or that tend to deceive or create a misleading impression, whether directly, or by omission or ambiguity.	Presumptive Negative Suitability Determination
Time Period	**Precipitating Issue**	**Result**
Indefinite	**Sex Offense:** Felony conviction for a "sex offense" as defined in M.G.L. c. 6, § 178C and M.G. L. c. 127, § 133E or like offenses in Other Jurisdictions.	Mandatory Disqualification
Indefinite	**Felony Convictions in Massachusetts or Other Jurisdictions:** For trafficking crimes under M.G.L. c. 94C, § 32E, or like crimes in Other Jurisdictions, except convictions for solely Marijuana-related crimes under M.G.L. c. 94C, § 32E (a), or like crimes in Other Jurisdictions.	Mandatory Disqualification
Indefinite	**Conviction or Continuance without a Finding (CWOF) for Any Distribution of a Controlled Substance to a Minor**	Mandatory Disqualification
Indefinite	**Failure to Register as a Sex Offender in Any Jurisdiction**	Mandatory Disqualification
Preceding Five Years	**Crimes of Domestic Violence Including, but Not Limited to**: Violation of an abuse prevention restraining order under M.G.L. c. 209A; and Violation of a harassment prevention order under M.G.L. c. 258E.	Presumptive Negative Suitability Determination

Indefinite	**(For Agents Working for a Transporter and Delivery-only)** Licensee or a Marijuana Establishment with a Delivery **Endorsement Multiple Crimes of Operating under the Influence:** Two offenses within a ten-year period; or three or more offenses within any period of time.	Presumptive Negative Suitability Determination
Time Period	**Precipitating Issue**	**Result**
Preceding Five Years	**Felony Convictions in Massachusetts or Other Jurisdictions**: For crimes of violence against a person or crimes of dishonesty or fraud, "violent crime" to be defined the same way as under M.G.L. c. 140, § 121 and M.G.L. c. 127, § 133E.	Mandatory Disqualification
Preceding Five Years	The applicant's or Licensee's prior actions posed or would likely pose a risk to the public health, safety, or welfare; and the risk posed by the applicant's or Licensee's actions relates or would likely relate to the operation of a Marijuana Establishment.	May make a Negative Suitability Determination in accordance with 935 CMR 500.800(8)

If TEN-TEN determines that one of TEN-TEN's registered marijuana agents has not properly notified the Commission in accordance with 935 CMR 500.802(3), or has otherwise become unsuitable for registration as a retail marijuana establishment agent and/or employment as a marijuana establishment agent, TEN-TEN shall immediately terminate the marijuana establishment agent's employment and shall notify the Commission within one (1) business day that the marijuana establishment agent is no longer suitable for registration as a retail marijuana establishment agent and no longer associated with TEN-TEN.

Training

As required by 935 CMR 500.105(2)(a), TEN-TEN shall ensure that all of TEN-TEN's agents has successfully completed a comprehensive training program that is tailored to the roles and

responsibilities of their job, prior to performing their job functions, including, but not limited to the Responsible Vendor Training Program. Agents responsible for tracking and entering product into the Seed-to-sale SOR must receive training in a form and manner determined by the Commission. At a minimum, TEN-TEN staff shall receive eight hours of on-going training annually.

In compliance with 935 CMR 500.105(2)(b)(1), at the time of licensure, all of TEN-TEN's current owners, managers, and employees shall have attended and successfully completed a Responsible Vendor Training Program operated by an education provider accredited by the Commission to provide the annual minimum of two hours of Responsible Vendor Training to marijuana establishment agents.

In compliance with 935 CMR 500.105(2)(b)(2), TEN-TEN's new owners, managers, and non-administrative employees shall complete the Responsible Vendor Training Program within ninety (90) days of the date they are hired.

In compliance with 935 CMR 500.105(2)(b)(3), TEN-TEN's owners, managers, and non-administrative employees shall successfully complete the program once every year thereafter.

TEN-TEN shall also encourage employees who are not owners, managers, or who do not handle or sell marijuana, to take the Responsible Vendor Training Program on a voluntary basis.

In compliance with 935 CMR 500.105(2)(b)(5), TEN-TEN shall maintain records of Responsible Vendor Training Program for at least four (4) years and made them available during normal business hours for inspection by the Commission and any other applicable licensing authority upon request.

In compliance with 935 CMR 500.105(2)(b)7, and as part of the Responsible Vendor Training Program, TEN-TEN's owners, managers, and non-administrative employees shall receive yearly training on a variety of topics relevant to marijuana, marijuana products, and marijuana establishment operations, including but not limited to the following:

a. Discussion concerning Marijuana's effect on the human body. Training shall include:
    i. Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
    ii. The amount of time to feel impairment;
    iii. Visible signs of impairment; and
    iv. Recognizing the signs of impairment.
b. Diversion prevention and prevention of sales to minors, including best practices;

c. Compliance with all tracking requirements;
d. Acceptable forms of identification. Training shall include:
    i. How to check identification;
    ii. Spotting false identification;
    iii. Provisions for confiscating fraudulent identifications; and
    iv. Common mistakes made in verification.
e. Other significant state laws and rules affecting operators, such as:
    i. Local and state licensing and enforcement;
    ii. Incident and notification requirements;
    iii. Administrative and criminal liability;
    iv. License sanctions;
    v. Waste disposal;
    vi. Health and safety standards;
    vii. Patrons prohibited from bringing marijuana onto licensed premises;
    viii. Permitted hours of sale;
    ix. Conduct of establishment;
    x. Permitting inspections by state and local licensing and enforcement authorities;
    xi. Licensee responsibilities for activities occurring within licensed premises;
    xii. Maintenance of records;
    xiii. Privacy issues; and
    xiv. Prohibited purchases and practices.
f. Such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program.

Pursuant to 935 CMR 500.105(9)(d)2(d) and (g), TEN-TEN shall maintain 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, as well as a notice of completed responsible vendor and eight-hour related duty training.

TEN-TEN LLC

7-27-21 Provisional Renewal

STATUS ON ENERGY AUDIT

TEN-TEN, LLC (hereinafter "TEN-TEN") is renewing its Provisional Licenses.

TEN-TEN's Energy Compliance Audit is not complete. Architectural Reviews have not been requested, as designs have not been completed.

Progress on Energy Compliance Audit

TEN-TEN has engaged MA licensed, Hill Engineers, Architects, Planners, Inc. to conduct their Energy Audit.