



## Massachusetts Cannabis Control Commission

### Marijuana Retailer

#### General Information:

License Number: MR283012  
Original Issued Date: 08/13/2020  
Issued Date: 08/13/2020  
Expiration Date: 08/13/2021

### ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: The Holistic Concepts, Inc

Phone Number: 339-970-8721 Email Address: david@thcbrockton.com

Business Address 1: 1915 Main St.

Business Address 2:

Business City: Brockton

Business State: MA

Business Zip Code: 02301

Mailing Address 1: 95 West Elm St.

Mailing Address 2:

Mailing City: Brockton

Mailing State: MA

Mailing Zip Code: 02301

### 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: 33

Percentage Of Control: 33

Role: Executive / Officer

Other Role: President

First Name: David

Last Name: Asack

Suffix: Mr.

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: Middle Eastern or North African (Lebanese, Iranian, Egyptian, Syrian, Moroccan, Algerian)

Specify Race or Ethnicity:

#### Person with Direct or Indirect Authority 2

Percentage Of Ownership: 33

Percentage Of Control:

33

Role: Executive / Officer

Other Role: Treasurer

First Name: Willow

Last Name: Craffey

Suffix: Mrs.

Gender: Female

User Defined Gender:

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

Specify Race or Ethnicity: Portuguese

#### Person with Direct or Indirect Authority 3

Percentage Of Ownership: 33

Percentage Of Control:

33

Role: Executive / Officer

Other Role: Secretary

First Name: Christine

Last Name: Asack

Suffix: Mrs.

Gender: Female

User Defined Gender:

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

Specify Race or Ethnicity: Portuguese

#### 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: David

Last Name: Asack

Suffix: Mr.

Types of Capital: Monetary/Equity

Other Type of Capital:

Total Value of the Capital Provided: \$130000

Percentage of Initial Capital: 28

Capital Attestation: Yes

##### Individual Contributing Capital 2

First Name: Willow

Last Name: Craffey

Suffix: Mrs.

Types of Capital: Monetary/Equity

Other Type of Capital:

Total Value of the Capital Provided: \$180000

Percentage of Initial Capital: 40

Capital Attestation: Yes

##### Individual Contributing Capital 3

First Name: Christine

Last Name: Asack

Suffix: Mrs.

Types of Capital: Monetary/Equity

Other Type of Capital:

Total Value of the Capital Provided: \$145000

Percentage of Initial Capital: 32

Capital Attestation: Yes

#### CAPITAL RESOURCES - ENTITIES

No records found

#### BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

Date generated: 12/03/2020

No records found

#### DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

#### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 1915 Main St.

Establishment Address 2:

Establishment City: Brockton

Establishment Zip Code: 02301

Approximate square footage of the establishment: 2400

How many abutters does this property have?: 7

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

#### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan to Remain Compliant with Local Zoning	Plan to Remain Compliant with Local Zoning.pdf	pdf	5ee2fcbd1c2dbc24d01a187c	06/11/2020
Community Outreach Meeting Documentation	Abutters_Redacted_Complete.pdf	pdf	5ee451a2721f40180b73211f	06/13/2020
Certification of Host Community Agreement	HCA_Upload .pdf	pdf	5eeb9db42d9da4181de9fc01	06/18/2020

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.: \$

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan for Positive impact_Amended_V2.pdf	pdf	5ef255ee8a595d6c1025754e	06/23/2020

#### ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

#### INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Executive / Officer

Other Role: President

First Name: David

Last Name: Asack Suffix: Mr.

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Executive / Officer

Other Role: Treasurer

First Name: Willow

Last Name: Craffey Suffix: Mrs.

RMD Association: Not associated with an RMD

Background Question: no

### Individual Background Information 3

Role: Executive / Officer

Other Role: Secretary

First Name: Christine

Last Name: Asack    Suffix: Mrs.

RMD Association: Not associated with an RMD

Background Question: no

### ENTITY BACKGROUND CHECK INFORMATION

No records found

### MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	Articles.pdf	pdf	5de7266eea4df3530e647640	12/03/2019
Bylaws	Corporate Bylaws.pdf	pdf	5de874b1170b4c5353e3d4a1	12/04/2019
Secretary of Commonwealth - Certificate of Good Standing	CertofgoodStanding_2020.pdf	pdf	5ee45381f8798118165275bb	06/13/2020
Department of Revenue - Certificate of Good standing	DOR CERT of Good Standing_ 2020.pdf	pdf	5ef2113772a76f6c0599749a	06/23/2020
Department of Revenue - Certificate of Good standing	Attestation of good standing DOR UA_ Amended_V2.pdf	pdf	5ef255956dc9337ae20f39c1	06/23/2020

No documents uploaded

Massachusetts Business Identification Number: 001345987

Doing-Business-As Name:

DBA Registration City:

### BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Insurance_Quote_Statement.pdf	pdf	5de72915fd468857b99bf0e4	12/03/2019
Proposed Timeline	Time_Line Updated.pdf	pdf	5de80bd1ea4df3530e647841	12/04/2019
Business Plan	Business Plan.pdf	pdf	5ee30370721f40180b731e2f	06/12/2020

### OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Qualifications and training	Qualifications and Training.pdf	pdf	5de87bdabcb01253152f9167	12/04/2019
Prevention of diversion	Prevention of Diversion.pdf	pdf	5de87d65a9ef3857c445c9d3	12/04/2019
Record Keeping procedures	Record Keeping Procedures.pdf	pdf	5de885a80f35e05798b3a35e	12/04/2019
Plan for obtaining marijuana or marijuana products	Plan for obtaining marijuana or marijuana products.pdf	pdf	5de98a60d5b0805341c654ba	12/05/2019
Security plan	Security_Plan_Amended.pdf	pdf	5eeb8743a7d30c17f5417b72	06/18/2020



Dispensing procedures	Dispensing Procedures_Amended.pdf	pdf	5eeb876d721f40180b732ee1	06/18/2020
Storage of marijuana	Storage_plan_amended.pdf	pdf	5eeb87956f370e24fce3f663	06/18/2020
Transportation of marijuana	Transportation_Updated_Amended.pdf	pdf	5eeb87c52989d72512a7714e	06/18/2020
Personnel policies including background checks	Personell Policies- Background Checks_Updated_6_16.pdf	pdf	5eeb882d721f40180b732eeb	06/18/2020
Inventory procedures	Inventory Control_Updated_Amended.pdf	pdf	5eeb8859ea7a9324e6466a5f	06/18/2020
Maintaining of financial records	Maintaining_Finacial_Records_Amended.pdf	pdf	5eeb893eea7a9324e6466a66	06/18/2020
Restricting Access to age 21 and older	restricting access 21 and over_Amended_V2.pdf	pdf	5eeba84d8e2a8b24c9810103	06/18/2020
Quality control and testing	Quality Control and Testing_Amended.pdf	pdf	5ef209ddbda1197ad793b739	06/23/2020
Diversity plan	Diversity Plan _ Updated Amended_v3.pdf	pdf	5ef26967b0062b7ac1b0be24	06/23/2020

#### MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

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

#### ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

#### COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

#### COMPLIANCE WITH DIVERSITY PLAN

No records found

#### 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: Closed	Sunday To: Closed

### Plan to Remain Compliant with Local Zoning

The purpose of this plan is to outline how The Hollistic Concepts, Inc (THC) is and will remain in compliance with local codes, ordinances and bylaws for the physical address of the retail marijuana establishment at 1015 South Main Street, Brockton, MA 02301, which shall include, but not be limited to, the identification of any local licensing requirements for the adult use of marijuana.

1050 South Main Street is located in General Commercial (C2) Zoning District and properly zoned pursuant to the City of Brockton Zoning Ordinance Article III Section 27-24.4 Adult Use of Marijuana. In accordance with Section 27-24.4(f)(i) the marijuana retail establishment is not located within 500 feet of any pre-existing public or private school providing education in kindergarten or any grades 1 through 12. Also, pursuant to Section 27-24.4(f)(ii) the marijuana retail establishment is not located within 500 feet of another licensed cannabis establishment. There are no other codes, ordinances, or bylaws relative the retail marijuana establishment.

In addition to THC remaining compliant with existing Zoning Ordinances; THC will continuously engage with City of Brockton officials to remain up to date with local zoning ordinances to remain fully compliant.

## Community Outreach Meeting Attestation Form

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

I, David Asack, (insert name) attest as an authorized representative of The Holistic Concepts LLC (insert name of applicant) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on 6/6/19 (insert date).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on 5/25/19 (insert date), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document).
3. A copy of the meeting notice was also filed on 5/25/19 (insert date) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on 5/23/19 (insert date), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee).

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

kedlocalsearch.com

# Classifieds

an Advertisement Call 508-588-5000 • Mon-Fri 9am-5pm

## SERVICES

## STUFF

## HOMES

## WHEELS

## Legal

## auction

### Notice of Self Storage Sale

Please take notice Avon Quality Storage located at 100 Ladage Dr., Avon MA 02322 intends to hold an auction to sell the goods stored by the following tenants at the storage facility. The sale will occur as an online auction via [www.storagefinders.com](http://www.storagefinders.com) on 6/10/2019 at 12:00 PM. Unless stated otherwise the description of the contents are household goods and furnishings. Manuel Louro unit #0127; Robert Johnston unit #1905; Arlene Owczarczak unit #1914; Katrina Hewitt unit #2411; Janet Woods unit #3516; Heather Richard unit #3707. All property is being stored at the above self-storage facility. This sale may be withdrawn at any time without notice. Certain terms and conditions apply. See manager for details.

13799106

5/25, 6/1, 2019

outreach meeting

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment by THE HOLISTIC CONCEPT Inc. is scheduled for June 6, 2019 at 3:00 p.m. at 54 Kingman Street Brockton MA 02302. The proposed Retail Marijuana Establishment is anticipated to be located at 1915 Main Street, Brockton Ma. 02301 There will be an opportunity for the public to ask questions.

13802396 5/25/19



## EMPLOYMENT



## MERCHANDISE

## Garage &amp; Yard Sales

**Bridgewater Estate Sale!** Sat, 5/25 and Sun, 5/26, 9am-4pm. 1243 Vernon Street.

**BROCKTON:** Sat. 5/25, 10-3. 22 Bradley Ave. Furn., household, collectibles, vintage items, dolls, tools, cameras, etc.

**EAST BRIDGEWATER Garden Club, Huge Plant Sale.** Perennials, flowering shrubs, baked goods, houseplants, home grown vegetables & herbs as well as handouts related to gardening. Sat., 5/25, 8:30am-2pm. Rain Date 5/26. Town Hall Lawn, 175 Central St. Proceeds go to scholarship and town beautification.

**EAST BRIDGEWATER** Sat. 5/25, Sun. 5/26, & Mon. 5/27, 9am-3pm. 54 Park Ave. Great prices. Everything must go.

**EAST Bridgewater Yard Sale!** Sat, May 25, 9am-2pm. 38 Summit Drive.

Antique tools, drill press, band saw, 50's hub caps, Go-Cart & related items!

**EASTON**-Mon. 5/27, 10-2. 176 Center St. Higher end clothing, kids items & more. \$1, \$3, \$5 items.

**WEST BRIDGEWATER**

### Bus Operators Wanted

Champion City Transit Management, Inc. Operating Company for

### bat

is accepting applications from qualified candidates for the position(s) of Part-Time Bus Operators. **CDL Class B License and Mass. DPU License required.**

We offer a competitive wage after probationary period of \$22.80 per hour, a pleasant working environment and the opportunity to grow with in

Help Jerry's Kids take the next step.

MDA is making bold inroads and gaining greater understanding of muscular dystrophy. With your help, we're providing the best and the brightest hope for all of Jerry's Kids and their families.

Sign and Post



[www.mda.org](http://www.mda.org)

MDA

### Miscellaneous for Sale

**STATIONARY EXERCISE BIKE** Like new. \$75. Call 781-361-1357

### Pets & Supplies

**5 AKC Labrador** Bunnies, 1st photo



## RECREATION

### Automotive Aftermarket

**SALE Cars Wanted \$ CASH PAID \$ 508-577-0073 BROCKTON**  
AUTO PARTS  
Scale open 7 days or same day pickup.  
**EVERETT'S**

**Notification to Abutters**

**Notice: You are being notified for a public hearing as your property is within 300 feet of the following proposal.**

A Community Outreach Hearing will be held on *Thursday, June 6, 2019 at 3:00 p.m. at the East Branch of the Public Library, 54 Kingman Street, Brockton, MA 02302* regarding the following application:

Name of Applicant: **The Holistic Concepts, Inc.**

Location where the activity is proposed is:

**1915 Main Street, Brockton, MA 02301**

Community Outreach Meeting on the above-mentioned date and time for a proposed Marijuana Establishment by THC, Inc.

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

**\*\*Via Certified Mail; 7015 1520 0002 3906 9394, 7015 1520 0002 3906 9387, 7015 1520 0002 3906 9370, 7015 1520 0002 3906 9367, 7015 1520 0002 3906 9356, 7015 1520 0002 3906 9349, 7015 1520 0002 3906 9332, 7015 1520 0002 3906 9325, 7015 1520 0002 3906 9318, 7015 1520 0002 3906 9301, 7015 1520 0002 3906 9431, 7015 1520 0002 3906 9448, 7015 1520 0002 3906 9455, 7015 1520 0002 3906 9462**

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p><b>Mr. Anthony Zeoli,</b>  <b>City Clerk</b>  <b>Brockton City Hall</b>  <b>45 School Street</b>  <b>Brockton, MA 02301</b></p>	<p>A. Signature  X </p> <p style="text-align: right;"><input type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)  <b>Kandace</b></p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>2. Article Addressed to:</p> <p><b>Mr. Anthony Zeoli,</b>  <b>City Clerk</b>  <b>Brockton City Hall</b>  <b>45 School Street</b>  <b>Brockton, MA 02301</b></p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature      <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery      <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail®      <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Restricted Delivery      <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Restricted Delivery      <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Restricted Delivery      <input type="checkbox"/> Signature Confirmation Restricted Delivery</p>
<p><b>U.S. Postal Service™</b>  <b>CERTIFIED MAIL® RECEIPT</b>  Domestic Mail Only</p>	
<p>For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>®.</p>	
<p><b>OFFICIAL USE</b></p>	
<p>Certified Mail Fee</p> <p>\$ <b>6.30</b></p> <p>Extra Services &amp; Fees (check box, add fee as appropriate)</p> <p><input checked="" type="checkbox"/> Return Receipt (hardcopy) \$ _____</p> <p><input type="checkbox"/> Return Receipt (electronic) \$ _____</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery \$ _____</p> <p><input type="checkbox"/> Adult Signature Required \$ _____</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery \$ _____</p> <p>Postage</p> <p>\$ <b>50</b></p> <p>Total Postage and Fees</p> <p>\$ <b>680</b></p> <p>Sent to</p> <p><b>Anthony Zeoli, City Clerk</b>  <b>Brockton City Hall, 45 School St</b>  <b>Brockton MA 02301</b></p>	<p>Postmark Here</p>
<p>PS Form 3800, April 2015 PSN 7530-02-000-9047      See Reverse for Instructions</p>	

7015 1520 0002 3906 9448



**ALERT: DUE TO LIMITED TRANSPORTATION AVAILABILITY AS A RESULT OF NATIONWI...**

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[FAQs >](#)

**Track Another Package +**

**Track Packages  
Anytime, Anywhere**

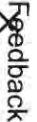
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(<https://reg.usps.com>

[/xsell?app=UspsTools&ref=homepageBanner&appURL=https%3A%2F%2Finformeddelivery.usps.com/box/pages/intro/start.action](#))

**Tracking Number:** 70151520000239069448

Remove 

Your item was delivered at 8:06 am on May 28, 2019 in BROCKTON, MA 02302.

 **Delivered**

May 28, 2019 at 8:06 am  
Delivered  
BROCKTON, MA 02302

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**Tracking History**



May 28, 2019, 8:06 am  
Delivered  
BROCKTON, MA 02302

Your item was delivered at 8:06 am on May 28, 2019 in BROCKTON, MA 02302.

May 25, 2019, 9:41 am

Arrived at Unit

BROCKTON, MA 02302

May 24, 2019, 9:53 pm

Departed USPS Regional Facility

BROCKTON MA DISTRIBUTION CENTER

May 23, 2019, 7:41 pm

Arrived at USPS Regional Facility

BROCKTON MA DISTRIBUTION CENTER

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**Product Information**



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**See Less** ^

Feedback

## Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions

**FAQs**

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# Abutters Information Report

Property Location		Owner Information	Address Information			Deed Information	
1933	MAIN ST	[REDACTED]	2 BLUEBERRY LANE			<i>Book</i>	35611
<u>Map/Route</u>	<u>Plot</u>		EAST BRIDGEWATER	MA	02333	<i>Page</i>	254
080-005	2					<i>Date</i>	20080215
1875	MAIN ST		948 BROADWAY			<i>Book</i>	29237
<u>Map/Route</u>	<u>Plot</u>		SAUGUS	MA	01906	<i>Page</i>	42
080-007	2-2					<i>Date</i>	20041012
1854	MAIN ST		286 ETTRICK ST			<i>Book</i>	43524
<u>Map/Route</u>	<u>Plot</u>		BROCKTON	MA	02301	<i>Page</i>	226
119-004	481-1					<i>Date</i>	20130823
1906	MAIN ST	[REDACTED]	1906 MAIN ST			<i>Book</i>	
<u>Map/Route</u>	<u>Plot</u>		BROCKTON	MA	02301	<i>Page</i>	
119-005	483-1					<i>Date</i>	
2000	MAIN ST		3-5 BOW ST			<i>Book</i>	37321
<u>Map/Route</u>	<u>Plot</u>		EVERETT	MA	02149	<i>Page</i>	204
119-006	484-1					<i>Date</i>	20090608
1900	MAIN ST		ONE DAVE THOMAS BLVD			<i>Book</i>	46272
<u>Map/Route</u>	<u>Plot</u>		DUBLIN	OH	43017	<i>Page</i>	41
119-022	481-2					<i>Date</i>	20151116
1940	MAIN ST	[REDACTED]	9 FAIRWAY DR			<i>Book</i>	45781
<u>Map/Route</u>	<u>Plot</u>		ANDOVER	MA	01810	<i>Page</i>	303
119-030	483-2					<i>Date</i>	20150710

East Side Library 54 Kingman St. Brockton, MA 02302 June 6, 2019  
3:00 PM

[illegible]



# The Holistic Concepts COMMUNITY OUTREACH

East Side Library  
54 Kingman St.  
Brockton, MA 02302  
June 6 , 2019  
3:00 PM

# Team

The Holistic Concepts

David Asack, President

Willow Craffey, Treasurer

Christine Asack, Secretary





# Today's Agenda



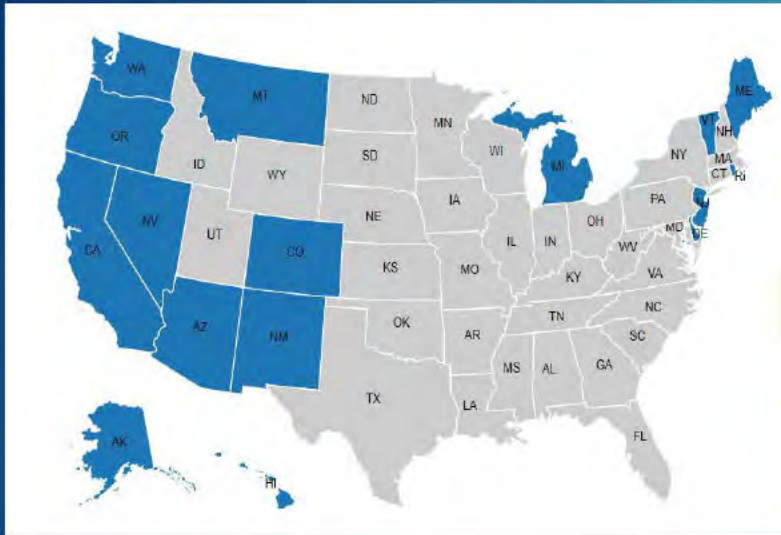
1. INTRODUCTION
2. LOCATION
3. ZONING
4. SECURITY
5. COMMUNITY IMPACT
6. NO NUISANCE
7. QUESTION & ANSWER



# Legalization Trend

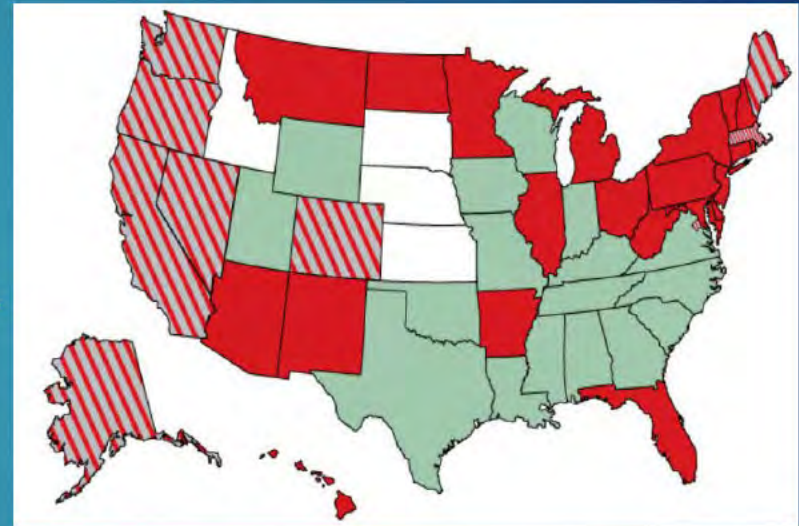


2013



Medical Legalized

2018



Medical and Adult Use Legalized



Medical Use Legalized



Limited CBD Use Legalized

# 1915 Main St.

1915 Main St.

Brockton MA, 02301

"Jlffy Lube"





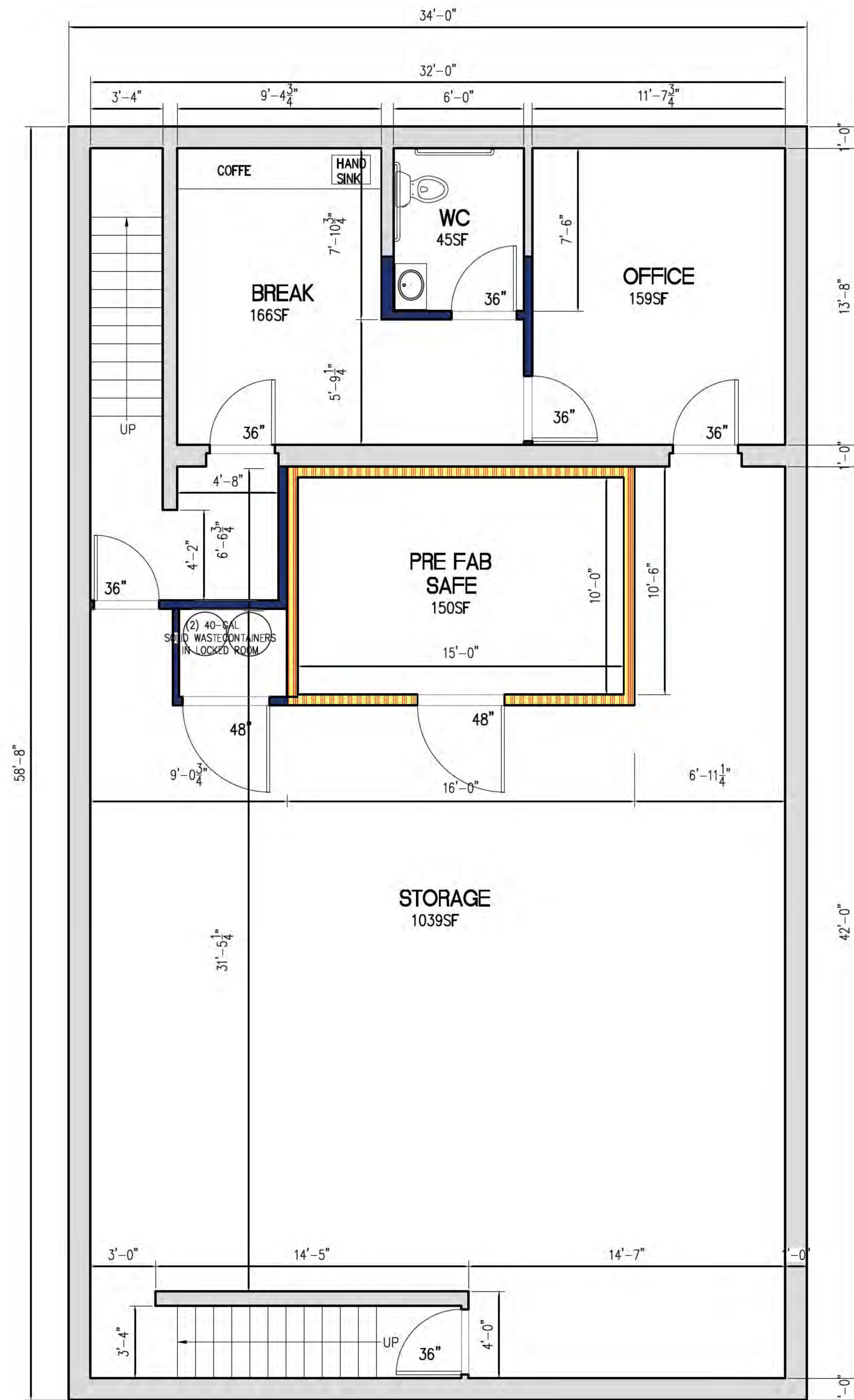
# Local Permitting

## Site Plan Approval – City of Brockton

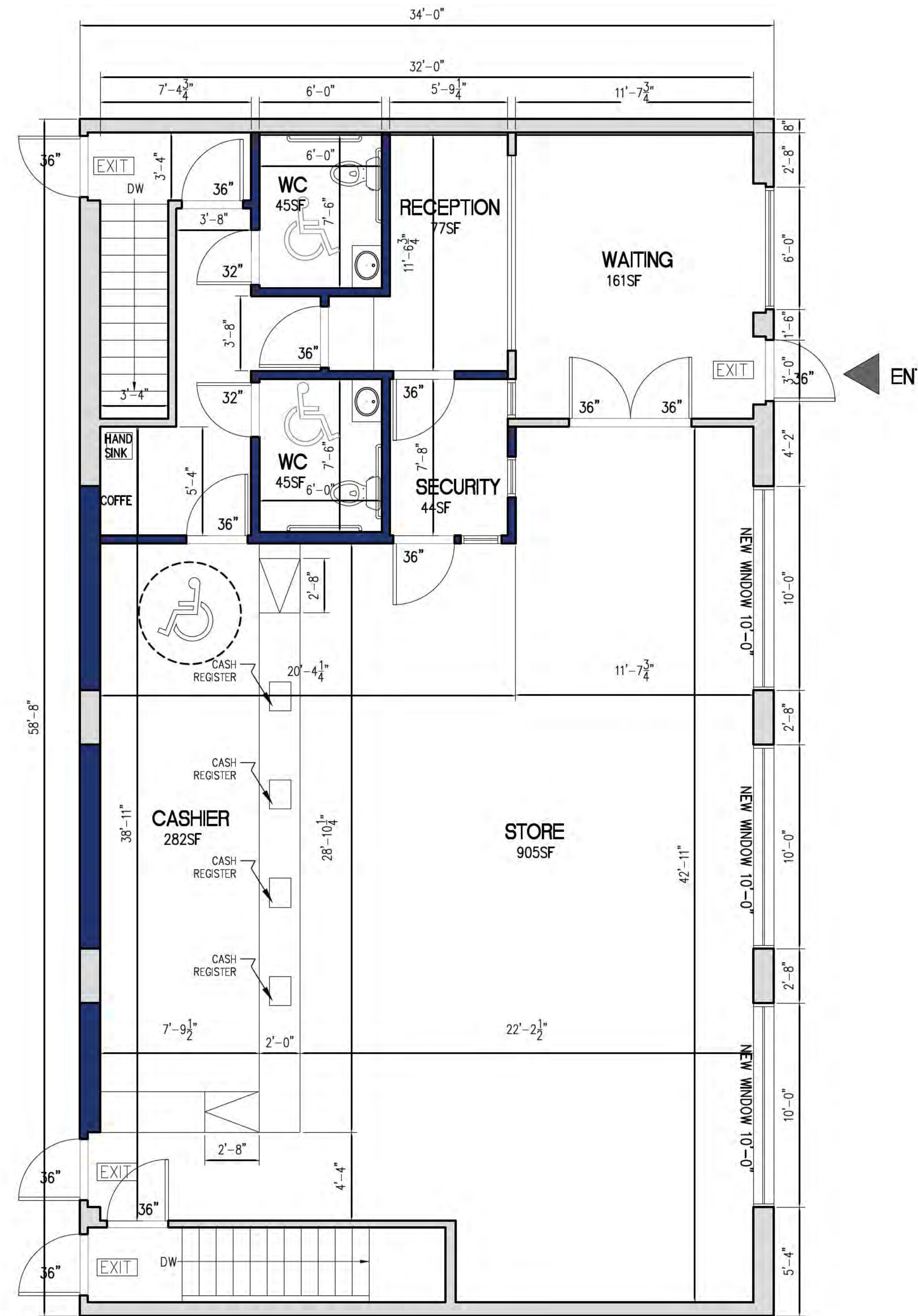


- ▶ The proposed facility will be subject to Site Plan Review by the Planning Board
- ▶ Site Plan Review is governed by Zoning Bylaw's
- ▶ Filing Requirements for Site Plan Review





1 Basement Floor Plan  
EX10 0 1 2 4 8 FEET 1/4"=1'-0" 1/48



2 First Floor Plan  
EX10 0 1 2 4 8 FEET 1/4"=1'-0" 1/48

### Area Summary

TOTAL NET BASEMENT-	1754SF
TOTAL NET 1ST FLOOR-	1789SF
TOTAL NET -	3543SF
TOTAL GROSS BASEMENT -	1994SF
TOTAL GROSS 1ST FLOOR -	1994SF
TOTAL GROSS -	3988SF

TYPES OF WALL

- EXISTING WALL
- REPLACE WALL
- SECURITY WALL

ASAK  
Adult- Use Dispensary

1915 Main St  
Brockton MA



ARCHITECTS' STUDIO  
Jerome R. Dixon, Architect

ARCHITECTURE  
PLANNING  
INTERIOR DESIGN

630 Park Street  
Stoughton MA 02072-3654

PHONE: 508.230.9684  
FAX: 508.219.4693

E mail: ARCHITECTSstudioONEcorporation@gmail.com  
WWW.ARCHITECTSSTUDIO1.COM

PROPOSED  
Floor Plans

DATE : 2019  
DRAWN BY : LP  
CHECKED BY : JRD  
ARCHITECT S PROJECT NO: J19059

0 1 2 4 8 FEET 1/4"=1'-0" 1/48

A10



# Local Permitting

## Buffer Zone Compliance – City of Brockton

- ▶ Per state regulations, a Marijuana Establishment may not be located within 500 feet of existing public or private school buildings (935 C.M.R. 500.1 10 (D))
- ▶ The proposed location complies with the 500 foot buffer zone from existing public or private school buildings

# Security and Diversion Prevention

## DPH and CCC regulations and bestpractices

- ▶ 24/7 control center of security and facilities staff
- ▶ Background Checks and Drug Screens (employee and contractors)



## Retail location security includes:

- ▶ Access Control (card access and biometric access)
- ▶ Surveillance – high definition cameras
- ▶ Extended Footage Retention
- ▶ Intrusion Prevention – gated perimeter zone
- ▶ Secured marijuana product in safes and vaults





# Security and Diversion Prevention



## Seed-to-sale electronic tracking

- ▶ Each seed or clone is given a ID that is tracked through the entire chain-of-custody through the sale at retail establishment

## Secure disposal

- ▶ Marijuana and marijuana waste

## Emergency policies and procedures

- ▶ Securing all product in the event of emergency

## Law enforcement and fire services

- ▶ Will have view of security plans

## Director of security

- ▶ Oversee program on a daily basis

## Child-proof and tamper-resistant packaging

- ▶ Warning statements (on packaging and in-store)

# Delivery/Transportation



- ▶ State licensed Marijuana Transporters deliver finished product from grow site to licensed retailers
- ▶ Security detail and GPS tracking
- ▶ Estimated 0-1 Van deliveries per day, 3 to 5 per week.





# Odor Control

- ▶ Air within the Secure Storage(Valt) is circulated 15x an hour using a “closed loop HVAC duct system” that filters, sterilizes, and controls temperature and humidity.
- ▶ All building exhaust points will be equipped with equipment to remove airborne organic compounds and remove odors
- ▶ Technologies being considered for include activated carbon filtering and bipolar ionization
- ▶ Products for Sale will be properly packaged and vacuum sealed and not exposed to the air

# Lights, Noise, Signs, Traffic

- ▶ Noise and lights sequestered to specific limited access areas and town bylaws
- ▶ Signage and lighting will conform to state and municipal guidelines
- ▶ Traffic study in progress to be presented to planning board.

# Adult Use Facts



- ▶ No increase in traffic fatalities
- ▶ Reduction of opioid fatalities
- ▶ Expanded economics: jobs, tourism, taxes



# Employment

- ▶ Brockton Residents offered priority for employment
- ▶ Construction jobs: 120 – 200
- ▶ Permanent jobs: 15-30

## Retail Site

- 14 full-time jobs

## Job Fair

- TBD



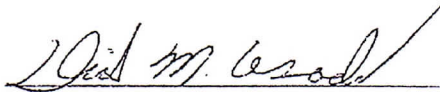
# Q & A

## Host Community Agreement (Host Section) 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

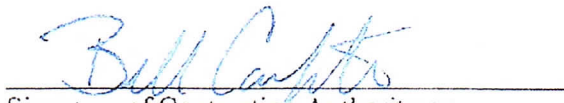
I, David M. Asack, (insert name) certify as an authorized representative of The Holistic Concepts (insert name of applicant) that the applicant has executed a host community agreement with Brockton (insert name of host community) pursuant to G.L.c. 94G § 3(d) on 1/31/19 (insert date).



Signature of Authorized Representative of Applicant

### Host Community

I, Bill Carpenter, (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for City of Brockton (insert name of host community) to certify that the applicant and City of Brockton (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 1/31/19 (insert date).



Signature of Contracting Authority or  
Authorized Representative of Host Community

## Introduction

The Holistic Concepts, Inc. (HC) proposed location is 1915 South Main Street, Brockton, MA 02301. The entire city of Brockton is designated as an area of disproportionate impact per the most recent Massachusetts Cannabis Control Commission's latest guidance. In addition, two of HC's co-owners have several existing businesses and various rental properties in Brockton. Therefore, HC has unique knowledge and connections to the community and understands its needs.

## Impact groups

The Holistic Concepts intends to implement programs to assist past or present Brockton residents as well as Massachusetts residents who have prior marijuana convictions, and residents with parents or spouses who have prior marijuana convictions. As noted above, Brockton is an area of disproportionate impact and therefore this targeted group that complies with the requirements of the Cannabis Control Law.

## Goals

The Holistic Concepts goals are as follows:

- A. To give hiring preferences to present and past Brockton residents and make the entry to the cannabis industry in Brockton more accessible;
- B. HC's goal is to hire at least 30% of its employees from the City of Brockton.
- C. Run at least two (2) fundraisers and/or make monetary donations within the City of Brockton to several Brockton based charities for drug awareness.
- D. Minimal Annual Donation of \$1,500 to the "No First time" Charity.

## Programs

The Holistic Concepts have developed specific programs to employ its goals and positively impact the Brockton community. Programs include but will not be limited to:

- 1. Remain focused on hiring its workforce from the City of Brockton.
- 2. Hosting several career fairs throughout the year in Brockton to meet The Holistic Concepts goals and to promote access to the cannabis industry. Monthly advertisement in the Enterprise newspaper promoting HC's hiring practices. This includes hiring Brockton residents and those with prior marijuana convictions.
- 3. Conducting fundraisers and/or make monetary donations to the City of Brockton annually. Planned partnerships are with:
  - a. No First Time, <https://evangfoundation.org/>. The No First time Charity provides Drug awareness to schools to fight the opioid epidemic.

#### Measurements:

Hollistic Concept's CEO will measure this plan's goals bi-annually to ensure the organization is on track to meet its goals. HC is aware that an audit of the Plan's progress will be submitted to the CCC upon license renewal.

- A. HC will document its employment practices, including the number of such employees hired, retained and promoted that are past or present City of Brockton residents. HC's goal is to hire at least 30% of its employees from the City of Brockton. At the end of the calendar year, if HC has not met plan goals, it will donate \$1,500 to the Social Equity Training and Technical Assistance Fund and will continue to refine its plan in order to meet plan goals the following year.
- B. HC will provide documentation concerning fundraising activities, donations and volunteer hours for participation in the various fundraisers and programs it assists. HC will implement a matching program for employees who wish to donate their time or funds towards any charitable endeavor, particularly those organizations referenced above.

#### Acknowledgements:

HC 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 sponsorships practices of every Marijuana Establishment; and (2) 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.





Early Education  
& awareness  
to help fight  
substance abuse

**The Evan G. Foundation / 'No First Time'**

[nofirsttime@gmail.com](mailto:nofirsttime@gmail.com)

<http://evangfoundation.org/>

***A registered 501 ( c ) 3 charity***

January 22, 2020

David Asack  
The Holistic Concepts  
Brockton, MA 02302

This letter is to thank you for your anticipated support of The Evan G. Foundation, founded Five years ago, dedicated to early education and awareness in our fight against substance abuse.

The Evan G. Foundation is a non-profit tax exempt organization as described in Section 170 (b) (1) (A) (vi) of the Internal Revenue Code. Our EIN # is 47-3626625.

Since the launch of our crusade, we have visited over 50 middle and high schools in Massachusetts and Rhode Island, bringing our critical compelling and dramatic message to over 2,500 students and hundreds of parents and teachers. Our programs have a lasting effect because real-life stories are told by people in recovery, by a State Police drug expert, and by the parents of Evan Greene, a young man who died of an overdose (my son) Among our early supporters were Brockton Mayor Bill Carpenter and Gov. Charlie Baker.

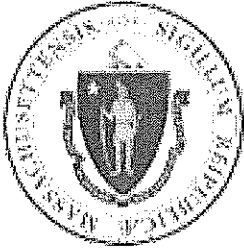
Again, thank you for your thoughtful and most generous assistance.

Sincerely,

John Greene / 781-844-1258

Co-Founder, The Evan G. Foundation / <https://evangfoundation.org/>

we will forever be grateful for all of the lives he helped **save**.



**The Commonwealth of Massachusetts**  
**William Francis Galvin**

Minimum Fee: \$250.00

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

Special Filing Instructions

**Articles of Organization**

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

Identification Number: 001345987

**ARTICLE I**

The exact name of the corporation is:

THE HOLISTIC CONCEPTS, INC

**ARTICLE II**

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

THE NAME OF ENTITY REQUIRES THAT THE PURPOSE INCLUDE A DISCLAIMER THAT THE ENTITY WILL NOT ENGAGE IN THE SALE OR CULTIVATION OF MARIJUANA OR ANY OF THE RELATED REGULATED PRODUCTS.

**ARTICLE III**

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

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding
		<i>Num of Shares</i>	<i>Total Par Value</i>	
STK	\$0.00000	300,000	\$0.00	300,000

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

**ARTICLE IV**

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

**ARTICLE V**

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

**ARTICLE VI**

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

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

#### ARTICLE VII

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

**Later Effective Date: Time:**

#### ARTICLE VIII

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

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

Name: DAVID ASACK  
No. and Street: 95 WEST ELM STREET  
City or Town: BROCKTON State: MA Zip: 02301 Country: USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	DAVID ASACK	272 PINE STREET STOUGHTON, MA 02072 US
TREASURER	WILLOW M CRAFFEY	38 EISENHOWER DRIVE SHARON, MA 02067 USA
SECRETARY	CHRISTINE ASACK	8 JOHNSON FARM LANE EAST BRIDGEWATER, MA 02333 USA
DIRECTOR	CHRISTINE ASACK	8 JOHNSON FARM LANE EAST BRIDGEWATER, MA 02333 USA
DIRECTOR	WILLOW M CRAFFEY	38 EISENHOWER DRIVE SHARON, MA 02067 USA
DIRECTOR	DAVID ASACK	272 PINE STREET STOUGHTON, MA 02072 USA

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

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

HOLISTIC HEALTH RETAIL MARKET

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

No. and Street: 95 WEST ELM STREET  
City or Town: BROCKTON State: MA Zip: 02301 Country: US

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

No. and Street: 95 WEST ELM STREET  
City or Town: BROCKTON State: MA Zip: 02301 Country: USA

**which is**

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

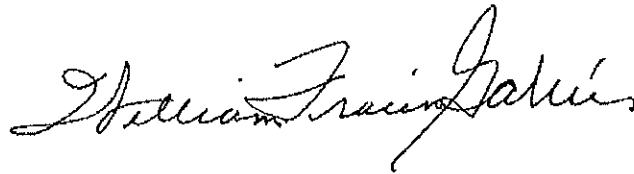
**Signed this 14 Day of September, 2018 at 3:42:17 PM by the incorporator(s).** *(If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)*

DAVID ASACK . PRESIDENT

THE COMMONWEALTH OF MASSACHUSETTS

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

September 14, 2018 01:37 PM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive, flowing style with a large initial 'W' and 'G'.

WILLIAM FRANCIS GALVIN

*Secretary of the Commonwealth*

**BYLAWS OF The Holistic Concepts, Inc.**  
(the "Corporation")

**SHAREHOLDERS**

**Annual Meeting**

1. A meeting of the Shareholders of the Corporation (the "Shareholders") will be held annually for the purpose of electing directors (the "Directors") of the Corporation and for the purpose of doing other business as may come before the meeting. If the day fixed for the annual meeting is a legal holiday in the Commonwealth of Massachusetts, the annual meeting will be held on the next succeeding business day or on a date determined by the board of directors for the Corporation (the "Board") that is no later than two weeks after the date specified in the meeting notice.
2. The Corporation must hold its annual meeting within the earlier of:
  - a. 6 months after the end of the Corporation's fiscal year;
  - b. 15 months after its last annual meeting.

If the annual meeting is not held within that time period then any shareholder entitled to participate in the meeting may apply to the superior court of the county where the Corporation's principal office, or, if none in the commonwealth of Massachusetts, its registered office, is located to fix the time and place of the meeting.

**Special Meetings**

3. Unless otherwise prescribed by statute, special meetings of the Shareholders, for any purpose or purposes, may only be called in the following ways:
  - a. By a majority of the Board; or
  - b. By the president of the Corporation (the "President"); or
  - c. By the holders of shares entitled to cast in total not less than 10 percent of the votes on any issue proposed for the meeting where written requests describing the purpose or purposes for the special meeting are signed, dated and delivered to a member of the Board or other Officer of the Corporation.

4. The Board will determine the time, place and date of any special meeting provided that, in the case of a special meeting called by the requisite percentage of Shareholders in accordance with these Bylaws, the Board will issue notice of the special meeting within 30 days of receipt of the written demand(s) by the relevant Officer of the Corporation.

#### **Place of Meeting**

5. The annual meetings or special meetings of the Shareholders may be held at any place in or out of the Commonwealth of Massachusetts at a place to be determined at the discretion of the Board. If no designation of the location is made for any annual or special meeting of the Shareholders, the place of the meeting will be the Principal Office of the Corporation. The Corporation must hold its annual meeting within the earlier of: a) six months after the end of the Corporation's fiscal year or; b) fifteen months after its last annual meeting. If an annual meeting is not held within that time period, a Shareholder may direct a request in writing to the Chairman of the Board of the Corporation to hold the annual meeting. If a notice of meeting is not given within 60 days of that request then any Shareholder entitled to vote at an annual meeting may apply to any court having jurisdiction for an order directing that the meeting be held and fixing the time and place of the meeting.

#### **Notice of Meetings**

6. The written notice of any meeting will be given not less than 7 days, but not more than 60 days before the date of the meeting to each Shareholder entitled to vote at that meeting. The written notice of the meeting will state the place, date and hour of the meeting, the means of remote communications, if any, and, in the case of a special meeting, the purpose or purposes for which the meeting is called.
7. If mailed, notice is given when the notice is deposited in the United States mail, postage prepaid, and directed to the Shareholder at the address of the Shareholder as it appears on the records of the Corporation. An affidavit of the secretary (the "Secretary") of the Corporation that the notice has been given will, in the absence of fraud, be prima facie evidence of the facts stated in the notice.
8. A written waiver, signed by the person entitled to a notice of meeting, or a waiver by electronic transmission by the person entitled to that notice, whether before or after the time stated in the notice, will be deemed equivalent to the person receiving the notice. Further, attendance of a person at a meeting will constitute a waiver of notice of that meeting, except when the person



attends a meeting for the express purpose of objecting at the beginning of the meeting to the transaction of any business because the meeting is not lawfully called or convened.

### **Consent of Shareholders in Lieu of Meeting**

9. Any action to be taken at any annual or special meeting of Shareholders, may be taken without a meeting, without prior notice and without a vote, if a consent or consents in writing, setting forth the action to be taken, is signed by the holders of outstanding stock having not less than the minimum number of votes that would be necessary to authorize or take the action at a meeting at which all shares entitled to vote on the matter were present and voted is delivered to the Corporation. Every written consent will bear the date of signature of each Shareholder who signs the consent. However, no written consent will be effective unless the consent is delivered, either by hand or by certified or registered mail, within 90 days of the earliest dated consent, to the Corporation to be filed with the records of proceedings of the Shareholders.

### **Remote Communication Meetings**

10. Remote communication means any electronic communication including conference telephone, video conference, the Internet, or any other method currently available or developed in the future by which Shareholders not present in the same physical location may simultaneously communicate with each other.
11. Where permitted under the statutes and regulations of the Commonwealth of Massachusetts, and in the sole and reasonable discretion of the Board of Directors, a meeting of Shareholders of the Corporation may be held at a specific location or may be held by any means of remote communication. Where a meeting will employ remote communication, one or more Shareholders may participate by means of remote communication or the meeting may be held solely by means of remote communication at the sole discretion of the Board of Directors. Where any remote communication is used in a Shareholder meeting, all persons authorized to vote or take other action at the meeting must be able to hear each other during the meeting and each person will have a reasonable opportunity to participate. This remote participation in a meeting will constitute presence in person at the meeting. All votes or other actions taken at the meeting by means of electronic transmission must be maintained as a matter of record by the Corporation.

**List of Shareholders Entitled to Vote**

12. The Officer who has charge of the Shareholders' List of the Corporation will prepare and make, not more than 70 days before every meeting of the Shareholders, a complete list of the Shareholders entitled to vote at the meeting, arranged in alphabetical order, and showing the address of each Shareholder and the number of shares of stock registered in the name of each Shareholder. The list must be available for inspection by any Shareholder beginning two days after the meeting is announced and continuing through the meeting. The list must be provided for any purpose related to the meeting:
  - a. On a reasonably accessible electronic network, so long as the information required to access the list is provided with the notice of the meeting; or
  - b. During ordinary business hours, at the Principal Office of the Corporation or at a place identified in the meeting notice in the city where the meeting will be held.
13. If the Corporation decides to make the list available on an electronic network, the Corporation will ensure that this information is available only to Shareholders of the Corporation. If the meeting is to be held at a physical location, then the list will be produced and kept at the time and place of the meeting during the whole time of the meeting and may be inspected by any Shareholder who is present.
14. If the meeting is to be held solely by means of remote communication, then the list will also be open to the examination of any Shareholder during the whole time of the meeting on a reasonably accessible electronic network, and the information required to access the list will be provided with the notice of the meeting.
15. If any Director willfully neglects or refuses to produce the list of Shareholders at any meeting for the election of Directors, or to open such a list to examination on a reasonably accessible electronic network during any meeting for the election of Directors held solely by means of remote communication, those Directors will be ineligible for election to any office at that meeting.
16. The Shareholders' List will be the only evidence as to who are the Shareholders entitled by this section to examine the list required by this section or to vote in person or by proxy at any meeting of Shareholders.

**Quorum and Required Vote**

17. A minimum of 75 percent of the shares entitled to vote, present in person or represented by proxy, will constitute a quorum entitled to take action at a meeting of Shareholders.
18. In all matters other than the election of Directors, any act of the Shareholders must be passed by an affirmative vote of the majority of the shares present in person or represented by proxy at the meeting and entitled to vote on the matter.
19. Directors will be elected by a majority of the votes of the shares present in person or represented by proxy at the meeting and entitled to vote on the election of Directors.
20. Where a separate vote by a class or series or classes or series of shares ("Eligible Shares") is required, 75 percent of the outstanding Eligible Shares present in person or represented by proxy, will constitute a quorum entitled to take action with respect to that vote on that matter. Any act to be taken must be passed by an affirmative vote of the majority of the outstanding Eligible Shares present in person or represented by proxy.

**Shareholders Voting Rights and Proxies**

21. Subject to the Articles of Organization, each Shareholder will be entitled to one vote for each share of stock held by that Shareholder.
22. Each Shareholder entitled to vote at a meeting of Shareholders or to express consent or dissent to corporate action in writing without a meeting may authorize another person or persons to act for that Shareholder by proxy, but no proxy will be valid after 11 months from the date of its execution unless the proxy provides for a longer period.
23. Execution of a proxy may be accomplished by the Shareholder or by the authorized Officer, Director, employee or agent of the Shareholder, signing the writing or causing that person's signature to be affixed to the writing by any reasonable means including, but not limited to, by facsimile signature.
24. A duly executed proxy will be irrevocable if it states that it is irrevocable and if, and only as long as, it is coupled with an interest sufficient in law to support an irrevocable power. A proxy may be made irrevocable regardless of whether the interest with which it is coupled is an interest in the shares or an interest in the Corporation generally.

**Voting Rights of Fiduciaries, Pledgers and Joint Owners of Shares**

25. Persons holding shares in a fiduciary capacity will be entitled to vote the shares so held. Persons whose shares are pledged will be entitled to vote, unless, in the transfer by the pledger on the books of the Corporation, that person has expressly empowered the pledgee to vote the shares, in which case only the pledgee, or that pledgee's proxy, may represent and vote the shares.

**Voting Trusts and Other Voting Agreements**

26. Two or more Shareholders may, by agreement in writing, create a voting trust by depositing their shares with a voting trustee, who will have the authority to vote the shares in accordance with the terms and conditions of the voting trust agreement. To be valid, the voting trustee must deliver copies of the list of Shareholders and the voting trust agreement to the Principal Office of the Corporation. Upon receiving the voting trust agreement, the Corporation will issue new share certificates in the name of the trustee and cancel the old share certificates. The new share certificates issued will state that they are issued pursuant to a voting trust agreement.
27. Any amendment to a voting trust agreement will be made by a written agreement, a copy of which will be filed with the Principal Office of the Corporation.
28. The right of inspection of any voting trust agreement or related amendment by a Shareholder of record or a holder of a voting trust certificate, in person or by agent, will be the same right of inspection that applies to the securities register of the Corporation.
29. An agreement between two or more Shareholders, if in writing and signed by the parties to the agreement, may provide that in exercising any voting rights, the shares held by them will be voted as provided by the agreement, or as the parties may agree, or as determined in accordance with a procedure agreed upon by them.
30. The above provisions concerning voting trusts and voting agreements will not be deemed to invalidate any voting or other agreement among Shareholders or any irrevocable proxy which is not otherwise illegal.

**Cumulative Voting**

31. Shareholders may use cumulative voting elections when electing Directors.

## **BOARD OF DIRECTORS**

### **General Powers**

32. The business and affairs of the Corporation will be managed by or under the direction of the Board.

### **Number, Tenure and Quorum**

33. The Board will consist of three members, each of whom will be a natural person. Directors need not be Shareholders. Each Director will hold office until that Director's successor is elected and qualified or until that Director's earlier resignation or removal. Any Director may resign at any time upon notice given in writing or by electronic transmission to the Corporation. In order to transact business at a meeting of the Directors, a quorum of 75 percent of the total number of Directors eligible to vote will be required. The vote of the majority of the Directors present at a meeting at which a quorum is present will be the act of the Board.

### **Regular Meetings**

34. By resolution, the Board may provide the time and place, either within or without the Commonwealth of Massachusetts, for the holding of regular meetings without any notice other than that resolution.

### **Special Meetings**

35. Special meetings of the Board may be called by or at the request of the President or by a majority of the Directors. The person or persons calling that special meeting of the Board may fix any date, time or place, either within or without the Commonwealth of Massachusetts, to be the date, time and place for holding that special meeting.

### **Notice**

36. Written notice of the date, time, and place of a special meeting of the Board will be given at least 7 days prior to the date set for that meeting. The written notice can be given personally, by mail, by private carrier, by telegraph, by telephone facsimile, or by any other manner as permitted by the Massachusetts Business Corporation Act. The notice will be given by the Secretary or one of the persons authorized to call Directors' meetings.
37. If written notice is mailed, correctly addressed to a Director's address as provided in the Corporation's current records, the notice will be deemed to have been given to that Director at

the time of mailing. If written notice is sent by private carrier or if the written notice is sent by United States mail, postage prepaid and by registered or certified mail, return receipt requested, the notice will be deemed to have been given to a Director on the date shown on the return receipt. Otherwise notice is effective when received by a Director.

38. Notice of any Directors' meeting may be waived by a Director before or after the date and time of the meeting. The waiver must be in writing, must be signed by a Director, and must be delivered to the Corporation for inclusion in the minutes or filing with the corporate records. The attendance of a Director at a meeting of the Board will constitute a waiver of notice of that meeting except where a Director attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully convened.

#### **Action by Directors Without a Meeting**

39. Any action to be taken at any meeting of the Board or of any committee of the Board may be taken without a meeting if all members of the Board or committee, as the case may be, consent to it in writing, or by electronic transmission and the writing or writings or electronic transmission or transmissions are filed with the minutes of proceedings of the Board, or committee. This filing will be in paper form if the minutes are maintained in paper form and will be in electronic form if the minutes are maintained in electronic form.

#### **Remote Communication Meetings**

40. Remote communication means any electronic communication including conference telephone, video conference, the Internet, or any other method currently available or developed in the future by which Directors not present in the same physical location may simultaneously communicate with each other.
41. A meeting of the Board may be held by any means of remote communication by which all persons authorized to vote or take other action at the meeting can hear each other during the meeting and each person has a reasonable opportunity to participate. This remote participation in a meeting will constitute presence in person at the meeting.

#### **Vacancies and Newly Created Directorships**

42. When vacancies or newly created directorships resulting from any increase in the authorized number of Directors occur, a majority of the Directors then in office, although less than a quorum, or a sole remaining Director will have the power to appoint new Directors to fill this



vacancy or vacancies. Each new Director so chosen will hold office until the next annual meeting of the Shareholders.

43. If at any time, by reason of death or resignation or other cause, the Corporation should have no Directors in office, then any Officer or any Shareholder or an executor, administrator, trustee or guardian of a Shareholder, or other fiduciary entrusted with like responsibility for the person or estate of a Shareholder, may call a special meeting of Shareholders for an election to fill the vacancy.
44. When one or more Directors resign from the Board and the resignation is to become effective at a future date, a majority of the Directors then in office, including those who have so resigned, will have the power to appoint new Directors to fill this vacancy or vacancies. The appointments of these new Directors will take effect when the resignation or resignations are to become effective, and each new Director so chosen will hold office until the next annual meeting of the Shareholders.

#### **Removal**

45. Any Director or the entire Board may be removed, with or without cause, by the holders of a majority of the shares then entitled to vote at an election of Directors at a special meeting of the Shareholders called for that purpose. No director may be removed when the votes cast against removal would be sufficient to elect the director if voted cumulatively at an election where the same total number of votes were cast.

#### **Organization**

46. Meetings of the Board will be presided over by the President, or in the President's absence by a Director chosen at the meeting. The Secretary will act as secretary of the meeting, but in the absence of the Secretary, the person presiding at the meeting may appoint any person to act as secretary of the meeting.

#### **Chairman of the Board**

47. The Chairman of the Board, if present, will preside at all meetings of the Board, and exercise and perform any other authorities and duties as may be from time to time delegated by the Board.

**Compensation**

48. The Board will, by resolution, fix the fees and other compensation for the Directors for their services as Directors, including their services as members of committees of the Board. All changes to Director compensation are subject to ratification by the Shareholders.

**Presumption of Assent**

49. A Director of the Corporation who is present at a meeting of the Board will be presumed to have assented to an action taken on any corporate matter at the meeting unless:
- a. The Director objects at the beginning of the meeting, or promptly upon the Director's arrival, to holding the meeting or transacting business at the meeting;
  - b. The Director's dissent or abstention from the action taken is entered in the minutes of the meeting; or
  - c. The Director delivers written notice of the Director's dissent or abstention to the presiding officer of the meeting before the adjournment of the meeting or to the Corporation within a reasonable time after adjournment of the meeting.
50. Any right to dissent or abstain from the action will not apply to a Director who voted in favor of that action.

**COMMITTEES****Appointment**

51. The Board may designate one or more committees, each committee to consist of one or more of the Directors of the Corporation. The Board may designate one or more Directors as alternate members of any committee, who may replace any absent or disqualified member at any meeting of the committee.
52. In the absence or disqualification of a member of a committee, the member or members present at any meeting and not disqualified from voting, whether or not that member or members constitute a quorum, may unanimously appoint another member of the Board to act at the meeting in the place of any absent or disqualified member.

53. The committee or committees, to the extent provided in the resolution of the Board will have and may exercise all the powers and authority of the Board in the management of the business and affairs of the Corporation, and may authorize the seal of the Corporation to be affixed to all papers which may require it. No such committee will have the power or authority in reference to the following matters:
- a. Approving or adopting, or recommending to the Shareholders, any action or matter (other than the election or removal of Directors) expressly required by the Massachusetts Business Corporation Act to be submitted to Shareholders for approval; or
  - b. Adopting, amending or repealing any Bylaw of the Corporation.

#### **Tenure**

54. Each member of a committee will serve at the pleasure of the Board.

#### **Meetings and Notice**

55. The method by which Directors' meetings may be called and the notice requirements for these meetings as set out in these Bylaws will apply to any committee designated by the Board as appropriate.

#### **Quorum**

56. The requirements for a quorum for the Board as set out in these Bylaws will apply to any committee designated by the Board as appropriate.

#### **Action Without a Meeting**

57. The requirements and procedures for actions without a meeting for the Board as set out in these Bylaws will apply to any committee designated by the Board as appropriate.

#### **Resignation and Removal**

58. Any member of a committee may be removed at any time, with or without cause, by a resolution adopted by a majority of the full Board. Any member of a committee may resign from the committee at any time by giving written notice to the Chairman of the Board of the Corporation, and unless otherwise specified in the notice, the acceptance of this resignation will not be necessary to make it effective.

**Vacancies**

59. Any vacancy in a committee may be filled by a resolution adopted by a majority of the full Board.

**Committee Rules of Procedure**

60. A committee will elect a presiding officer from its members and may fix its own rules of procedure provided they are not inconsistent with these Bylaws. A committee will keep regular minutes of its proceedings, and report those minutes to the Board at the first subsequent meeting of the Board.

**OFFICERS****Appointment of Officers**

61. The Officers of the Corporation (individually the "Officer" and collectively the "Officers") will consist of the President, a treasurer (the "Treasurer") and the Secretary.
62. The Officers will be appointed by the Board at the first meeting of the Directors or as soon after the first meeting of the Directors as possible, if Officers have not already been appointed. Any appointee may hold one or more offices.

**Term of Office**

63. Each Officer will hold office until a successor is duly appointed and qualified or until the Officer's death or until the Officer resigns or is removed as provided in these Bylaws.

**Removal**

64. Any Officer or agent appointed by the Board or by the Incorporators may be removed by the Board at any time with or without cause, provided, however, any contractual rights of that person, if any, will not be prejudiced by the removal.

**Vacancies**

65. The Board may fill a vacancy in any office because of death, resignation, removal, disqualification, or otherwise.

**President**

66. Subject to the control and supervisory powers of the Board and its delegate, the powers and duties of the President will be:
- a. To have the general management and supervision, direction and control of the business and affairs of the Corporation;
  - b. To preside at all meetings of the Shareholders when the Chairman of the Board is absent;
  - c. To call meetings of the Shareholders to be held at such times and at such places as the President will deem proper within the limitations prescribed by law or by these Bylaws;
  - d. To ensure that all orders and resolutions of the Board are effectively carried out;
  - e. To maintain records of and certify, whenever necessary, all proceedings of the Board and the Shareholders;
  - f. To put the signature of the Corporation to all deeds, conveyances, mortgages, guarantees, leases, obligations, bonds, certificates and other papers and instruments in writing which have been authorized by the Board or which, in the opinion of the President, should be executed on behalf of the Corporation; to sign certificates for the Corporation's shares; and, subject to the instructions of the Board, to have general charge of the property of the Corporation and to supervise and manage all Officers, agents and employees of the Corporation; and
  - g. To perform all other duties and carry out other responsibilities as determined by the Board.

**Treasurer**

67. Subject to the control and supervisory powers of the Board and its delegate, the powers and duties of the Treasurer will be:
- a. To keep accurate financial records for the Corporation;

- b. To deposit all money, drafts and checks in the name of and to the credit of the Corporation in the banks and depositories designated by the Board;
- c. To endorse for deposit all notes, checks, drafts received by the Corporation as instructed by the Board, making proper vouchers for them;
- d. To disburse corporate funds and issue checks and drafts in the name of the Corporation, as instructed by the Board;
- e. To submit to the President and the Board, as requested, an account of all transactions by the Treasurer and the financial condition of the Corporation;
- f. To prepare and submit to the Board annual reports detailing the financial status of the Corporation; and
- g. To perform all other duties and carry out other responsibilities as prescribed by the Board or the President.

#### **Secretary**

68. The Secretary will perform the following duties:
- a. Prepare the minutes of the meetings of the Shareholders and meetings of the Board and keep those minutes in one or more books provided for that purpose;
  - b. Authenticate the records of the Corporation as will from time to time be required;
  - c. Ensure that all notices are duly given in accordance with the provisions of these Bylaws or as required by law;
  - d. Act as custodian of the corporate records and of the corporate seal, if any, and ensure that the seal of the Corporation, if any, is affixed to all documents the execution of which on behalf of the Corporation under its seal is duly authorized;
  - e. Keep a register of the post office address of each Shareholder;

- f. Sign, along with the President, certificates for shares of the Corporation, the issuance of which will have been authorized by resolution of the Board;
- g. Have general charge of the Shareholders' List of the Corporation; and
- h. Perform all duties incidental to the office of Secretary and any other duties as from time to time may be delegated to the Secretary by the President or the Board.

#### **Delegation of Authority**

69. The Board reserves the authority to delegate the powers of any Officer to any other Officer or agent, notwithstanding any provision in these Bylaws.

### **LOANS, CHECKS, DEPOSITS, CONTRACTS**

#### **Loans**

70. Without authorization by a resolution of the Board, the Corporation is prohibited from making or accepting loans in its name, or issuing evidences of indebtedness in its name. The authorization of the Board for the Corporation to perform these acts can be general or specific.

#### **Checks, Drafts, Notes**

71. All checks, drafts, or other orders for the payment of money, notes, or other evidences of indebtedness issued in the name of the Corporation must be signed by a designated Officer or Officers, agent or agents of the Corporation and in a manner as will from time to time be determined by resolution of the Board.

#### **Deposits**

72. All funds of the Corporation not otherwise used will be deposited to the credit of the Corporation in banks, trust companies, or other depositories designated by the Board.

#### **Voting Securities Held by the Corporation**

73. The President, or another Officer or agent designated by the Board will, with full power and authority attend, act, and vote, on behalf of the Corporation, at any meeting of security holders or interest holders of other corporations or entities in which the Corporation may hold securities or interests. At that meeting, the President or other delegated agent will have and execute any and all rights and powers incidental to the ownership of the securities or interests that the



Corporation holds.

**Contracts**

74. The Board may give authority to any Officer or agent, to make any contract or execute and deliver any instrument in the name of the Corporation and on its behalf, and that authority may be general or specific.

**Conflict of Interest by Directors**

75. A Director or Officer of the Corporation will be disqualified from voting as a Director or Officer on a specific matter where that Director or Officer deals or contracts with the Corporation either as a vendor or purchaser.
76. A Director or Officer of the Corporation will not be disqualified as a Director or Officer for the sole reason that the Director or Officer deals or contracts with the Corporation either as a vendor, purchaser, or otherwise.

**Loans to Employees and Officers**

77. The Corporation may lend money to, or guaranty any obligation of, or otherwise assist, any Officer or employee of the Corporation or of its subsidiary, including any Officer or employee who is a Director of the Corporation or any subsidiary of the Corporation, whenever, in the opinion of the Directors, the loan, guaranty or assistance may reasonably be expected to benefit the Corporation. The loan, guaranty or other assistance may be with or without interest, and may be unsecured, or secured in such manner as the Board will approve, including, without limitation, a pledge of shares of the Corporation. Nothing contained in this section is to be construed so as to deny, limit or restrict the powers of guaranty or warranty of the Corporation at common law or under any applicable statute.

## APPENDIX

### Glossary

- **Bylaws** - the purpose of these bylaws (the "Bylaws") is to provide rules governing the internal management of the Corporation.
- **Chairman of the Board** - Once a Board of Directors has been appointed or elected by the Shareholders, the Board will then elect a chairman (the "Chairman of the Board"). The Chairman of the Board will act to moderate all meetings of the Board of Directors and any other duties and obligations as described in these Bylaws.
- **Corporate Officer** - A corporate officer (individually the "Officer" and collectively the "Officers") is any individual acting for or on behalf of the Corporation. An Officer of the Corporation will usually be appointed to a specific task such as secretary, president, treasurer or other similar position. One person may hold several offices. The Officers will manage the day-to-day operations of the Corporation and report to the Board of Directors.
- **Principal Executive Office** - The Principal Executive Office for the Corporation is where the President of the Corporation has an office.
- **Principal Office** - The Principal Office of the Corporation is the address designated in the annual report where the executive offices of the Corporation are located.
- **Principal Place of Business** - The Principal Place of Business is the address at which the Corporation conducts its primary business.
- **Registered Office** - The Registered Office is the physical street address within the state where the registered agent can be contacted during normal business hours for service of process.
- **Shareholders' List** - A Shareholders' List is the complete record of the owners of shares of stock in the Corporation.



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

William Francis Galvin  
Secretary of the  
Commonwealth

Date: June 11, 2020

To Whom It May Concern :

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

**THE HOLISTIC CONCEPTS, INC**

is a domestic corporation organized on **September 14, 2018**, under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

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

Secretary of the Commonwealth

Certificate Number: 20060241720

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

Processed by: bod



Commonwealth of Massachusetts  
Department of Revenue  
Geoffrey E. Snyder, Commissioner

mass.gov/dor

Letter ID: L0075369024  
Notice Date: June 19, 2020  
Case ID: 0-000-901-703



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



THE HOLISTIC CONCEPTS, INC  
95 W ELM ST  
BROCKTON MA 02301-4317

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

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

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

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

### ***What if I have questions?***

If you have questions, call us at (617) 887-6400 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](http://mass.gov/dor) to learn more about Massachusetts tax laws and DOR policies and procedures, including your Taxpayer Bill of Rights, and MassTaxConnect for easy access to your account:


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

Edward W. Coyle, Jr., Chief  
Collections Bureau

ATTESTATION OF NO CERTIFICATE OF GOOD STANDING WITH D.O.R  
Dept. of Unemployment Assistance.

I, David Asack, President of The Holistic Concepts Inc., hereby attest that The Holistic Concepts Inc. cannot register with the department until hiring employees.

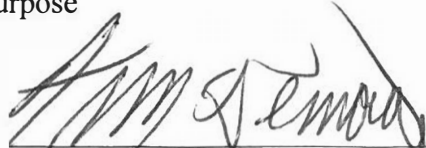
Signed under the pains and penalties of perjury this 6<sup>th</sup> June, 2020

  
David Asack, Pres.

COMMONWEALTH OF MASSACHUSETTS

Plymouth, SS

On this 18<sup>th</sup> day of June 2020 before me the undersigned notary public personally appeared **David Asack** and proved to me through satisfactory evidence of identification which were personal knowledge to be the person whose name is signed on the preceding or attached document and who swore or affirmed to me that the contents of the document and acknowledged to me that he signed it voluntarily for its stated purpose

  
Notary Public **Frederick McDermott**  
My Commission expires: **3/30/2023**

The Holistic Concepts , Inc. Has received several quotes for insurance from various companies and all companies have stated that they would insure our Adult Use Marijuana establishment at 1915 Main st. Brockton MA 02301. Please see attached quote



# Quote

P.O.Box 27648, Richmond, VA 23261; (804) 289-2700.

Quotes are valid for 30 days from the Quote Date shown below and subject to all conditions listed below. Coverage may not be bound without confirmation in writing from the Company.

**Attention:** Matthew Arnold  
**Firm:** SCU Middletown  
**Applicant:** The Hollistic Concepts Inc  
The Hollistic Concepts  
**Quote Date:** 6/19/2019  
**Proposed Policy Term:** TBD - 12 Months

**Submission No.:** 2462039  
**Company:** James River Insurance Company

**Description:** Recreational Marijuana Dispensary.

**Schedule of Named Insureds**  
The Hollistic Concepts Inc

## Terms and Conditions

### Coverage

General Liability

#### Option A

**Coverage Form**  
**Retro Date**

Claims Made  
James River Policy  
Inception

### Limits

General Aggregate	\$2,000,000
Each Occurrence	\$1,000,000
Prod & Comp Ops Agg	\$2,000,000
Medical Expense	Excluded
Damages to Premises	\$50,000
Personal & Advertising Injury	\$1,000,000

### Deductible

Deductible	\$5,000
	Per Claim

Class	Class Description	Exposure
18707A	Recreational Marijuana - Dist	1,500,000 Revenue

P.O.Box 27648, Richmond, VA 23261; (804) 289-2700.

Quotes are valid for 30 days from the Quote Date shown below and subject to all conditions listed below. Coverage may not be bound without confirmation in writing from the Company.

### Option A

<b>Premium:</b>	\$3,773
<b>TRIA:</b> If Elected	+ \$189
<b>Cyber Liability:</b>	+ \$342
<b>Tax</b>	4% Total Premium
<b>Company Fee:</b>	\$450.00

**Minimum Earned Percent:** 25%

\* Includes Premium amount, Company Fee, Inspection Fee, Cyber Liability premium, as applicable. Does not include TRIA premium.

### Forms

See attached schedule. Additional limits may be subject to Retro date endorsement.





# Quote

P.O.Box 27648, Richmond, VA 23261; (804) 289-2700.

Quotes are valid for 30 days from the Quote Date shown below and subject to all conditions listed below. Coverage may not be bound without confirmation in writing from the Company.

**Coverage**  
Cyber Liability

**Coverage Form**  
Discovery Date

**Deductible**  
\$1,000 (Per Occurrence)

**Limits**

Third Party Cyber Liability Coverage	\$100,000
Regulatory Proceeding Claim Expense Coverage	\$50,000
First Party Privacy Breach Expense Coverage	\$50,000
Cyber Coverage Aggregate	\$100,000

**Forms**

See attached schedule for Cyber Coverage Insurance Form.

**Subjectivities and Contingencies**

See separate Contingencies section

**Cyber Premium: \$342**

If you are interested in purchasing a higher Cyber Coverage Limit, please contact your Underwriter.

THE CYBER COVERAGE ACCEPTANCE/REJECTION FORM (BFR5000) IS ATTACHED AND MUST BE RETURNED ALONG WITH YOUR REQUEST TO BIND. THANK YOU.

P.O.Box 27648, Richmond, VA 23261; (804) 289-2700.

Quotes are valid for 30 days from the Quote Date shown below and subject to all conditions listed below. Coverage may not be bound without confirmation in writing from the Company.

## Audit Information

<b>Audit Frequency</b>	Annual	<b>Audit Type</b>	Physical
<b>Exposure Base</b>	1,500,000	<b>Audit Rate</b>	\$2.5200
<b>Rating Basis</b>	Gross Sales		

## Contingencies

This quote is being offered by a non-admitted insurer subject to 100% minimum policy premium, with a 25% minimum earned. All taxes, fees and filing (if applicable) are the responsibility of the broker. Coverage is not bound without confirmation in writing from the Company.

This quote is subject to receipt and favorable review of the following prior to binding:

1. Copies of all Product Labels/Catalogs / Brochures.
2. Cyber Liability Acceptance / Rejection Form.
3. Completed TRIA Form
4. Completed Surplus Lines Tax Form within 10 business days of binding
5. Copy of insured's Marijuana License. Due within 30 days.

## Additional Comments

Full wording for LS2020:

1. Dimethylamylamine, DMAA, 1,3-dimethylamylamine, methylhexanamine, 4-methylhexan-2-Amine HCL, geranamine, geranium extract and geranium oil
2. eria jarensis, or eria jarensis extract
3. Dendrobium, Dendrobe Noble, Dendrobium Extract, Dendrobium nobile, Dendrobium officinale, Extrait de Dendrobium, Jin Chai Shi Hu (D. nobile), Nobile Dendrobium (D. nobile), Orchid Stem, Stem-Orchid, Tie Pi Shi (D. officinale), Vinterdendrobium (D. nobile).
4. 1,3-Dimethylbutylamine, 2-Amino-4-methylpentane Citrate, 4-Amino-2-Methylpentane Citrate, 4-Amino Methylpentane Citrate, Amperall, AMP, AMP Citrate, 4-AMP Citrate, 4-Methyl-2-Pentanamine
5. BMPEA, BmePEA, R-beta-methylphenethylamine, Beta-methylphenethylamine, or Acacia Rigidula extract
6. Picamilon, pikatropin, pikamilon, nicotinyl-gamma-aminobutyric acid, nicotinoyl-GABA, and 4-(Pyridine-3-carboxylamino) butanoic acid.
7. Methylsynephrine; oxilofrine; p-hydroxyephedrine
8. Kratom; mitrgynine; 7-hydroxymitragynine
9. DMHA, Octodrine, 2-Aminoisoheptane, 2-amino-6-methylheptane, 2-amino-5-methylheptane
10. diacetyl, acetoin, and 2,3-pentanedione
11. Tianeptine

## List of Locations

	City	State	Zip
1915 Main St	Brockton	MA	02301

P.O.Box 27648, Richmond, VA 23261; (804) 289-2700.

Quotes are valid for 30 days from the Quote Date shown below and subject to all conditions listed below. Coverage may not be bound without confirmation in writing from the Company.

**Forms to be Attached (Please click form name or number to open a specimen copy in another browser window):**

<a href="#">LS0005US-0416</a>	Commercial General Liability Policy Declarations
<a href="#">AP0001US-0403</a>	Schedule A
<a href="#">CG0002-1207</a>	Commercial General Liability Coverage Form -Claims Made
<a href="#">AP2702US-0107</a>	Extended Reporting Period Endorsement
<a href="#">AP2704US-0406</a>	Restricted Reporting Endorsement
<a href="#">AH2307US-1016</a>	Deductible Endorsement - Damages and Expenses
<a href="#">AP2103US-0607</a>	Minimum Policy Premium
<a href="#">AP2108US-0811</a>	Supplementary Payments (Defense Costs) within Limits of Insurance
<a href="#">LS2010US-0505</a>	Non-Stacking Endorsement
<a href="#">LS2025US-0907</a>	Life Sciences Premium Endorsement
<a href="#">AP2004US-0403</a>	Additional Insured - Managers or Lessors of Premises
	<b>&lt;Where required by written contract or written agreement&gt;</b>
<a href="#">AP2104US-1012</a>	Common Policy Conditions
<a href="#">AP2107US-0403</a>	Binding Arbitration
<a href="#">CG0068-0509</a>	Recording and Distribution of Material or Information in Violation of the Law Exclusion
<a href="#">CG2135-1001</a>	Exclusion - Coverage C - Medical Payments
<a href="#">CG2136-0305</a>	Exclusion - New Entities
<a href="#">CG2147-1207</a>	Employment-Related Practices Exclusion
<a href="#">CG2167-1204</a>	Fungi or Bacteria Exclusion
<a href="#">IL0021-0908</a>	Nuclear Energy Liability Exclusion
<a href="#">AH2309US-1003</a>	Exclusion - Designated Operations
	<b>&lt;(1) The furnishing of marijuana for consumption at the Insured's premises (2) Any and all participation by the insured in conventions, trade shows, festivals, or other special events where marijuana will be distributed and/or consumed&gt;</b>
<a href="#">AP2020US-1206</a>	Exclusion - Occupational Disease
<a href="#">AP2028US-0505</a>	Exclusion - Electronic Media
<a href="#">AP2031US-0411</a>	Exclusion - Cross Suits
<a href="#">AP2032US-0518</a>	Exclusion - Employers Liability
<a href="#">AP2036US-1105</a>	Absolute Pollution and Pollution Related Liability - Exclusion
<a href="#">AP2044US-0411</a>	Assault and Battery Exclusion
<a href="#">AP2111US-1105</a>	Exclusion - Punitive Damages
<a href="#">AP5040US-1209</a>	Exclusion - Firearms
<a href="#">AP5054US-0311</a>	Combined Policy Exclusions
<a href="#">AP5058US-1215</a>	Exclusion - Business Conduct
<a href="#">GC2131US-0403</a>	Fiduciary Exclusion
<a href="#">LS2005US-1110</a>	Specified Products Exclusion Endorsement
<a href="#">LS2015US-0505</a>	Communicable Disease Exclusion
<a href="#">LS2020US-1108</a>	Additional Specific Product Exclusion
	<b>&lt;(1) DMAA; (2) Eria Jarensis (3) Dendrobium; (4) DMBA / AMP Citrate; (5) BMPEA; (6) Picamilon; (7) Methlsynephrine; (8) Kratom; (9) DMHA; (10) Diacetyl; (11) Tianeptine; Including all chemical names for these compounds. See additional comments for full wording.&gt;</b>
<a href="#">LS2101US-1108</a>	Specified Nutraceutical Substances Exclusion
<a href="#">LS2108US-0219</a>	Exclusion - Health Hazards - Tobacco & Cannabis Business
<a href="#">MC2161US-0903</a>	Exclusion - Designated Product(s)
	<b>&lt;(1) Any and all products consumed at "1915 Main St. Brockton, MA 02301"&gt;</b>
<a href="#">AP5027R-0115</a>	Rejection of Coverage for Certified Acts of Terrorism Coverage
<a href="#">CG2175-0115</a>	Exclusion of Certified Acts of Terrorism and Exclusion of Other Acts of Terrorism Committed Outside the United States
<a href="#">ILP001-0104</a>	US Treasury Departments Office of Foreign Assets Control (OFAC) Advisory Notice to Policyholders
<a href="#">AP0100US-0403</a>	Privacy Policy

THE REQUEST FOR TAX PAYER INFORMATION AP5000 IS ATTACHED AND MUST BE RETURNED ALONG WITH YOUR REQUEST TO BIND. THANK YOU.

P.O.Box 27648, Richmond, VA 23261; (804) 289-2700.

Quotes are valid for 30 days from the Quote Date shown below and subject to all conditions listed below. Coverage may not be bound without confirmation in writing from the Company.

## **POLICYHOLDER DISCLOSURE NOTICE**

### **ELECTION OR REJECTION OF CYBER COVERAGE ENDORSEMENT**

The Company has offered you the option to purchase a Cyber Coverage Endorsement as a coverage enhancement to your policy. You have the right to purchase coverage for certain first and third party cyber losses as outlined in the endorsement. You must elect to purchase or reject coverage before the effective date of this policy. If we do not receive notification that you elect coverage, no coverage for first or third party cyber related claims will be afforded under the policy you are purchasing from us.

**PLEASE COMPLETE THIS FORM BY SELECTING ONE OF THE FOLLOWING CHOICES BELOW BY PLACING AN "X" IN THE APPROPRIATE BOX AND SIGNING THE FORM**

- ☐ **ELECT and PURCHASE:** I hereby elect to purchase the Cyber Coverage Endorsement for a premium of \$342
- ☐ **DECLINE:** I decline to purchase the Cyber Coverage Endorsement offered with my quote.

**REMEMBER TO ELECT OR REJECT CYBER COVERAGE ABOVE SIGN DATE THE BELOW. Return this form to your insurance agent. This election or rejection notice must be received by the Company on or before the effective date of the policy.**

Insured Name

The Hollistic Concepts Inc

Submission Number

2462039

Policyholder/Applicant's Signature

Insurance Company

James River Insurance Company

Print Name/Date

Date

BFR5000 02-15



# Quote

P.O.Box 27648, Richmond, VA 23261; (804) 289-2700.

Quotes are valid for 30 days from the Quote Date shown below and subject to all conditions listed below. Coverage may not be bound without confirmation in writing from the Company.

## POLICYHOLDER DISCLOSURE NOTICE

### SELECTION OR REJECTION OF TERRORISM INSURANCE COVERAGE

You are hereby notified that under the Terrorism Risk Insurance Act (TRIA), effective November 26, 2002, as extended, you have a right to purchase insurance coverage for losses arising out of certified acts of terrorism. The term "certified act of terrorism" means an act that is certified by the Secretary of the Treasury, in accordance with the provisions of the federal Terrorism Risk Insurance Act, to be an act of terrorism; to be a violent act or an act that is dangerous to human life, property, or infrastructure; to have resulted in damage within the United States, or outside the United States in the case of an air carrier or vessel or the premises of a United States mission, as part of an effort to coerce the civilian population of the United States or to influence the policy or affect the conduct of the United States Government by coercion. There is a \$100 billion dollar annual cap on losses arising out of acts of terrorism described above.

YOU SHOULD KNOW THAT TERRORISM COVERAGE REQUIRED TO BE OFFERED BY THE ACT FOR LOSSES CAUSED BY CERTIFIED ACTS OF TERRORISM IS PARTIALLY REIMBURSED BY THE UNITED STATES UNDER A FORMULA ESTABLISHED BY FEDERAL LAW. UNDER THIS FORMULA, THE UNITED STATES PAYS A PERCENTAGE OF THAT PORTION OF COVERED TERRORISM LOSSES EXCEEDING THE STATUTORILY ESTABLISHED DEDUCTIBLE PAID BY THE INSURANCE COMPANY PROVIDING THE COVERAGE. THE PREMIUM CHARGED FOR THIS TERRORISM COVERAGE IS PROVIDED BELOW AND DOES NOT INCLUDE ANY CHARGES FOR THE PORTION OF LOSS COVERED BY THE FEDERAL GOVERNMENT UNDER THE ACT.

You have the right to purchase coverage for losses from certified acts of terrorism as described above. You must elect or reject coverage before the effective date of this policy. If we do not receive notification that you elect coverage, an exclusion for terrorism will be attached to your policy and you will not be covered for terrorist acts.

### YOU MUST SELECT ONE OF THE FOLLOWING BY PLACING AN "X" IN THE APPROPRIATE BOX AND SIGNING THE FORM BELOW

- ☐ ELECT: I hereby elect to purchase the Terrorism Coverage required to be offered under the Act for a premium of Quote option selected.
- ☐ DECLINE: I decline to purchase the Terrorism Coverage required to be offered under the Act. I understand that I will have no coverage for loss or damage resulting from acts of terrorism.

**REMEMBER TO SELECT OR REJECT TERRORISM COVERAGE ABOVE AND SIGN AND DATE THE FORM BELOW. Return this form to your insurance agent. This selection or rejection notice must be received by the Company on or before the effective date of the policy.**

Insured Name

The Hollistic Concepts Inc

Submission Number

2462039

Policyholder/Applicant's Signature

Insurance Company

James River Insurance Company

Print Name/Date

Policy Number

AP 5001US 01-15



# Quote

P.O.Box 27648, Richmond, VA 23261; (804) 289-2700.

Quotes are valid for 30 days from the Quote Date shown below and subject to all conditions listed below. Coverage may not be bound without confirmation in writing from the Company.

## REQUEST FOR TAX PAYING BROKER INFORMATION

**Insured Name:** The Hollistic Concepts Inc

**Policy (quote) Number:**

**Please provide us with the surplus lines tax payment information requested below. IF ANY OF THE INFORMATION BELOW HAS BEEN PRE-FILLED BUT IS INCORRECT, PLEASE PROVIDE THE CORRECT INFORMATION. Pre-filled information on this form will be used by us for state reporting of surplus lines premium unless you advise otherwise.**

**Multi-State Risk (Y/N):**

**State where taxes are to be paid (This is Home State, if multi-state risk):**

**Name of Surplus Lines Licensee filing taxes:**

**Agency Affiliation:**

**Surplus Lines License Number:**

**Address of Surplus Lines Licensee:**

**Telephone Number:**

**If taxes are payable in New Jersey, you must provide us with the 14 digit New Jersey Transaction Number for this policy as well as other New Jersey specific information for reporting:**

**NJ Transaction Number:**

**NJ Agency SLA Number\***

**NJ Agency License Number\*\***

\*This is the number that the Surplus Lines Association has assigned to your agency

\*\*The State of New Jersey requires license number of the agency, not the individual agent who is filing taxes

### PREMIUM ALLOCATION MAY APPLY TO SOME POLICIES

If applicable, please provide the following information for each state where taxes are to be paid.

State

Premium Amount(basis for taxes)


As the producing broker, it is your responsibility to comply with state surplus lines regulations. For multi-state risks, broker must designate Home State and comply with Home State surplus lines laws and regulations. Arrangements must be made for the payment of any applicable state tax and stamping fees to appropriate state, stamping office or clearing house.

AP 5000US 01-15

## AFFIDAVIT BY ASSURED

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

I/We \_\_\_\_\_ of \_\_\_\_\_ do hereby state that in \_\_\_\_\_, 20\_\_\_\_, I/We directed \_\_\_\_\_ my/our Insurance Broker to obtain insurance against certain risks as described herein. My/Our Insurance Broker informed us that the required insurance could not be obtained from, or would not be written by, companies licensed or admitted to transact business in the Commonwealth of Massachusetts.

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

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

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

Signature of Assured \_\_\_\_\_  
 Print Name \_\_\_\_\_  
 Date: \_\_\_\_\_

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

Name of Insured: \_\_\_\_\_ Address \_\_\_\_\_  
 Location of Property \_\_\_\_\_  
 Description \_\_\_\_\_  
 Coverage \_\_\_\_\_  
 Limit: \_\_\_\_\_ Premium \_\_\_\_\_

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

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

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

## AFFIDAVIT BY SPECIAL BROKER

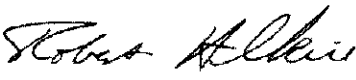
I, Robert Alkire of CRC Insurance Services, Inc. in said county of Brevard depose and say that I was engaged directly by the Assured named herein or informed by the Assured's Insurance licensed Agent/Broker that after diligent efforts, he/she is unable to procure in companies admitted to do business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

Company	NAIC#	Policy#	Premium
_____	_____	_____	_____
_____	_____	_____	_____

Amendments to Affidavit: ( ) Increase ( ) Decrease

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

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

License # 1825802 Signature  Date \_\_\_\_\_  
 Robert Alkire

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



# The Holistic Concepts

## ***BUSINESS PLAN***

***Category:*** Cannabis Dispensary/Store

Date Created:

**11/11/2018**

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

**Revised 11/02/19**





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# Executive Summary

## Company Summary

The Holistic Concept is a brand of cannabis dispensary/retail store that will provide an unparalleled adult use marijuana shopping experience.

Our adult use marijuana dispensary retail store is proposed to be located on the South Side of Brockton, Massachusetts nestled on one of the least busiest streets in Brockton (1915 South main St.)which has under 17,000 vehicles pass through the area each day.

The facility is well positioned, and it matches the ideal picture of a community store. Although the business is launching with just one outlet in Brockton, we have plans to open other outlets in key locations all around Massachusetts. Brockton has also granted The Holistic Concepts a Cultivation Host Agreement for the city.

Our knowledgeable budtenders will navigate and guide our customers through our vast product variety Featuring locally sourced core product line of the highest quality cannabis flowers, concentrates, edibles and more.

The Holistic Concept is to be organized/formed as a Corporation and will be led by David Asack, Willow Craffey and Christine Asack who will serve as President , Treasurer and Secretary.

## David Asack , President

David Asack was born and raised in Brockton MA and educated through 12 years of Brockton school system. His class was the first class to attend the newly built Brockton High School in 1974. David attended Boston College and graduated with a bachelor of arts degree and went on to graduate new England School of Law Obtaining a Doctorate 1981. David received his license to practice law in 1981. He began the practice of law with the Plymouth county district attorney's office. In 1983, David joined the firm of Asack and Asack which was founded in 1955 by Attorney George N. Asack who in 1981 was appointed Judge of the Plymouth county probate court.

David has been practicing law for the past 35 years in downtown Brockton.

Over 90% of his clients are Brockton residents, and business Brockton business owners.

David Asack sat on the Plymouth county bar association for approx. 10 years during that time I was sat as chairman of the bench bar committee, treasurer, vice president, and finally president. During his tenure on the board he was the representative of the bar association members and worked as the liaison with the court system helping to adopt rules processes and procedures to make the system work more efficiently. Many of those process and procedures continue to be utilized to this day.

He was trained and received his certificate in civil mediation and serves as a mediator in Brockton district court. Attorney Asack also serves as a volunteer lawyer of the day in the Southeast housing court.

Given David's extensive background in serving the needs of the Brockton community, he is eminently qualified to serve that same community in the retail marijuana business.

**Willow Craffey, Treasurer**

Willow Craffey will serve as the Treasurer for The Holistic Concepts. Willow is an experienced entrepreneur with a passion for building businesses and launching new ventures. Willow has been in the wellness industry for more than 25 years. She owns and operates several businesses which include an organic skin health and beauty salon, realty group and private financial institution.

Each of these businesses is unique in their own way and requires competent financial responsibility, strategic planning, ethics and strong leadership/management skills. As an esthetician Willow delivers exceptional care to each of her clients and provides an organic experience that has her clients committed to their self-care and holistic wellness which has kept her business fiscally solvent for more than 25 years. As a real estate investor and finance company owner she is financially responsible for buying, renovating, selling, leasing properties, as well as lending funds to help individuals and families with less than perfect credit the ability to achieve their dream in owning a home or becoming an investor themselves.

Willow is committed in working within Brockton and local communities in the beatification of areas that have been neglected and contributes to the pride of home ownership to local residents of Brockton and surrounding areas. The experiences of being a business owner encompass all the areas of business operations from growth, sales, employer, leadership and management. Willow is committed to organic health and wellness and sees the cannabis business as extension to her holistic views to empower individuals to be all they can be and will look to employ local residents of the Brockton community.

**Christine Asack, Secretary**

Christine Asack is a Senior Human Resources Business Partner with a Bachelor of Art degree in Psychology from Boston University. In this role, she is responsible for supporting an organization's managers and employees in various areas including department re-organizations, compensation, coaching and feedback, recruitment, benefit administration, diversity and inclusion initiatives, strategic workforce planning, workforce development, employee relations, performance management and progressive discipline.

Christine began her HR career in 2003 as a Human Resources Administrative Assistant with the Arbour Health System. During her time with the Arbour Health System, Christine progressed into roles in benefits and talent acquisition before working as an HR Generalist/Manager. Christine began working at Harvard Pilgrim Health Care as a Senior Human Resources Business Partner in April of 2013 in an effort to continue her career development in Human Resources. She is a member of the Northeast Human Resources Association (NEHRA) and the Society for Human Resource Management (SHRM).

Christine's 15 years of experience has helped her to gain expertise and has allowed her to cultivate relationships as a trusted partner, consultant, strategist and leader. Her experience in Human Resources will allow THC to be at the forefront of creating an organization with core values, an employee handbook containing innovative policies, procedures and training methods for employees of all levels. Her expertise will also allow THC to create a diverse and inclusive workforce by become a leading participant at Brockton area job fairs allowing Brockton area residents priority review to be a part of our workforce.

## Products & Services

The Holistic Concepts will offer high-grade cannabis and extract products compliant with the guidelines and regulations set forth by the Massachusetts Cannabis Control Commission (the "Commission"). In addition to traditional sativa, indica, and hybrid cannabis flower, The Holistic Concepts will offer a wide range of products that will allow The Holistic Concepts to serve customers with a wide variety of needs and preferences. The products The Holistic Concepts intends to offer include, but will not be limited to:

1. Topical Salves
2. Creams and Lotion
3. Patches
4. Oral Mucosal/Sublingual Dissolving Tablets
5. Tinctures
6. Oral Sprays
7. Inhalation Ready to Use CO2 Extracted Hash Oils
8. Ingestion Capsules
9. Food and Beverages

**Customers:** The Holistic Concepts' target customers are consumers 21 years of age or older who live and work in the City of Brockton and surrounding communities in Plymouth County and who are seeking to purchase high- quality marijuana and marijuana products in a secure, professional, welcoming and conveniently-located retail establishment.

The Holistic Concept dispensary/retail store will ensure that all our customers are given first class treatment whenever they visit our store. We will have a CRM software(BiotrackTHC) that will enable us to manage a one-on- one relationship with our customers and purchasing trends no matter how large our Customer base grows.

**Our Mission:** The Holistic Concepts is a Massachusetts business corporation who is Majority owned by Minority Women . The Holistic Concepts will strive to provide a high quality, safe and compliant retail establishment where consumers will have the ability to purchase high quality Cannabis to customers with a product, service and brand they can trust. To build our brand on the core values of customer service and care, hospitality, highest standards of quality, honesty, integrity and community outreach. This will lead to our goal of providing thousands of people a life full of relaxation, relief, creativity and fun.

**Vision:** Be the number one cannabis dispensary/retail store in Brockton Massachusetts through Product lines and branding.

**Goal:** The Holistic Concepts' goals include providing safe and high-grade cannabis and extract products to eligible consumers above the age of 21. The Holistic Concepts also strives to contribute to the local economy and community by providing jobs, organizing employee volunteer days and industry specific training classes to prospective employees.

**Management:** Our owners have decades of experience in management, HR and the service industry that will be used to develop strong vendor relationships and many strategic partnerships extending nationally and covering all areas of the Cannabis Industry.

**Corporate and Application Status:** The Holistic Concepts is a Massachusetts business corporation in good standing that is applying for a license from the Commission to operate an adult use Marijuana Retailer Establishment ("MRE") in the Commonwealth. The Holistic Concepts will file, in a form and manner specified by the Commission, an application for licensure as a MRE consisting of three (3) packets: an Application of Intent packet; a Background Check packet; and a Management and Operations Profile packet, in addition to submission of the required fees.

< Start

#### Executive Summary Startup Table

	\$ Quarter 1	Quarter 2	Quarter 3	Quarter 4
<b>CAPEX</b>				
Land & Development	92,000	0	0	0
Space improvements including finishing/	97,200	0	0	0
Security system including multiple camera	43,200	0	0	0
Furniture, Display Counters, Refrigerator	39,600	0	0	0
Cost for Computer Software (Accounting S	7,200	0	0	0
Exterior	0	0	0	0
Access control	5,500	0	0	0
Security System	12,500	0	0	0
Other	0	0	0	0
Other	0	0	0	0
<b>OPEX</b>				
Direct Costs	205,324	220,314	270,062	319,810
Initial & General Costs	69,600	24,300	24,300	24,300
Operating Expenses, including salaries	58,758	105,527	129,393	129,971
Marketing & Sales Expenses	40,464	54,963	54,963	54,963
Misc.	1,341	3,050	3,766	3,783
<b>Total</b>	<b>672,686</b>	<b>408,154</b>	<b>482,484</b>	<b>532,828</b>

Required Investments=

750,000

#### Executive Summary Direct and Indirect Impacts Table

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Federal Tax	239,888	493,138	629,682	725,899	820,581	915,264	1,009,946
State Tax	29,010	147,188	222,039	276,108	330,427	380,929	430,076
Community programs	8,617	20,625	26,336	30,360	34,320	38,280	42,240

#### Sales Forecast

	\$ Flower	Concentrates	Edibles	Topicals	Other
Year 1	1,402,592	539,458	168,311	12,947	34,525
Year 2	2,681,250	1,031,250	321,750	24,750	66,000
Year 3	3,423,658	1,316,792	410,839	31,603	84,275
Year 4	3,946,800	1,518,000	473,616	36,432	97,152
Year 5	4,461,600	1,716,000	535,392	41,184	109,824
Year 6	4,976,400	1,914,000	597,168	45,936	122,496
Year 7	5,491,200	2,112,000	658,944	50,688	135,168

	\$ 1m	2m	3m	4m	5m	6m
Year 1	0	132,000	144,833	157,667	170,500	183,333
	7m	8m	9m	10m	11m	12m
Year 1	196,167	209,000	221,833	234,667	247,500	260,333
	1m	2m	3m	4m	5m	6m
Year 2	273,167	286,000	298,833	311,667	324,500	337,333
	7m	8m	9m	10m	11m	12m
Year 2	350,167	363,000	375,833	388,667	401,500	414,333
	1m	2m	3m	4m	5m	6m
Year 3	427,167	440,000	440,000	440,000	440,000	440,000
	7m	8m	9m	10m	11m	12m
Year 3	440,000	440,000	440,000	440,000	440,000	440,000

#### Direct Costs

	\$ Year 1	Year 2	Year 3	Year 4	Year 5
Products Purchase					

#### Executive Summary Charts Data

##### Revenue&Profit

	Revenue	Gross Profit	Net Income
Year 1	2,157,833	1,142,323	-5,170
Year 2	4,125,000	2,348,276	697,745
Year 3	5,267,167	2,998,487	1,166,817
Year 4	6,072,000	3,456,662	1,508,069
Year 5	6,864,000	3,907,531	1,852,870

##### Cash Flow

	Operational Cash	Ending Period Cash Flow
Year 1	-122,045	205,755
Year 2	634,038	652,293
Year 3	1,167,276	1,632,070
Year 4	1,488,361	2,932,931
Year 5	1,833,162	4,703,593

Flowers	552,948	1,057,037	1,349,719	1,555,958	1,758,909
Concentrates	215,783	412,500	526,717	607,200	686,400
Beverages & Edibles	67,324	128,700	164,336	189,446	214,157
Topicals	5,179	9,900	12,641	14,573	16,474
Other	13,810	26,400	33,710	38,861	43,930
<b>Delivery Costs</b>					
Delivery costs	7,193	13,750	17,557	20,240	22,880
Fuel	2,452	4,688	5,985	6,900	7,800
Other delivery costs	0	0	0	0	0
<b>Other Direct Costs</b>					
Other direct costs	0	0	0	0	0
Initial inventory	86,086	0	0	0	0
Other direct costs	0	0	0	0	0
Other direct costs	0	0	0	0	0
<b>Taxes</b>					
City of Brockton Cannabis Business Tax (	64,735	123,750	158,015	182,160	205,920
<b>Total</b>	<b>1,015,510</b>	<b>1,776,724</b>	<b>2,268,680</b>	<b>2,615,338</b>	<b>2,956,469</b>

#### Operational Costs

	\$ Year 1	Year 2	Year 3	Year 4	Year 5
<b>G&amp;A Expenses - Initial &amp; General Costs</b>					
Legal Fees & Licensing for setting up	17,500	0	0	0	0
Engineering and Architect Fees	22,000	0	0	0	0
Design and Traffic Fees	5,800	0	0	0	0
Licensing renewal and other legal fees	0	13,000	13,000	13,000	13,000
Professional Services, Commercial Insurance	97,200	101,088	101,088	101,088	101,088
<b>G&amp;A Expenses - Retail</b>					
Other G&A Expenses	0	0	0	0	0
Building Renting	86,400	134,784	134,784	134,784	134,784
Building Maintenance, including utilities	7,200	11,232	11,232	11,232	11,232
Equipment Maintenance	4,800	7,488	7,488	7,488	7,488
Administrative expenses, including phone and internet	9,600	14,976	14,976	14,976	14,976
Inventory Control Systems, Security & Other Software Services	72,000	112,320	112,320	112,320	112,320
Other G&A Expenses	0	0	0	0	0
Other G&A Expenses	0	0	0	0	0
Property Taxes	0	0	0	0	0
Community Service (% of gross receipts)	8,617	20,625	26,336	30,360	34,320
<b>SG&amp;A Expenses - Marketing &amp; Sales Expenses</b>					
Marketing Expenses, including PR, Branding, Online and Offline advertising	112,200	95,472	63,648	42,432	31,824
Other Marketing & Sales Expenses	0	0	0	0	0
Other Expenses	0	0	0	0	0
SG&A Expenses - Misc.	11,941	14,940	14,156	13,640	13,441
<b>Salaries &amp; Benefits</b>	328,186	393,035	403,568	403,568	403,568
<b>Total</b>	<b>783,443</b>	<b>918,959</b>	<b>902,596</b>	<b>884,888</b>	<b>878,041</b>

#### Funding Analyses

Long-term Debt	1	2	3	4	5	6
Long-Term Debt Beginning Balance	750,000	750,000	750,000	750,000	750,000	734,375
Long-Term Debt Repayment	0	0	0	0	15,625	15,625
Long-Term Debt Ending Balance	750,000	750,000	750,000	750,000	734,375	718,750
ROI	7,500	7,575	7,651	7,727	7,648	7,569

Profit Share (Investors)	0	0	0	0	0	0
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<b>Long-term Debt</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>12</b>
Long-Term Debt Beginning Balance	718,750	703,125	687,500	671,875	656,250	640,625
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	703,125	687,500	671,875	656,250	640,625	625,000
ROI	7,488	7,407	7,324	7,241	7,158	7,073
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>13</b>	<b>14</b>	<b>15</b>	<b>16</b>	<b>17</b>	<b>18</b>
Long-Term Debt Beginning Balance	625,000	609,375	593,750	578,125	562,500	546,875
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	609,375	593,750	578,125	562,500	546,875	531,250
ROI	6,987	6,901	6,814	6,726	6,637	6,547
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>19</b>	<b>20</b>	<b>21</b>	<b>22</b>	<b>23</b>	<b>24</b>
Long-Term Debt Beginning Balance	531,250	515,625	500,000	484,375	468,750	453,125
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	515,625	500,000	484,375	468,750	453,125	437,500
ROI	6,456	6,364	6,272	6,178	6,084	5,988
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>25</b>	<b>26</b>	<b>27</b>	<b>28</b>	<b>29</b>	<b>30</b>
Long-Term Debt Beginning Balance	437,500	421,875	406,250	390,625	375,000	359,375
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	421,875	406,250	390,625	375,000	359,375	343,750
ROI	5,892	5,795	5,696	5,597	5,497	5,395
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>31</b>	<b>32</b>	<b>33</b>	<b>34</b>	<b>35</b>	<b>36</b>
Long-Term Debt Beginning Balance	343,750	328,125	312,500	296,875	281,250	265,625
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	328,125	312,500	296,875	281,250	265,625	250,000
ROI	5,293	5,190	5,085	4,980	4,874	4,766
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>37</b>	<b>38</b>	<b>39</b>	<b>40</b>	<b>41</b>	<b>42</b>
Long-Term Debt Beginning Balance	250,000	234,375	218,750	203,125	187,500	171,875
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	234,375	218,750	203,125	187,500	171,875	156,250
ROI	4,657	4,548	4,437	4,325	4,212	4,098
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>43</b>	<b>44</b>	<b>45</b>	<b>46</b>	<b>47</b>	<b>48</b>
Long-Term Debt Beginning Balance	156,250	140,625	125,000	109,375	93,750	78,125
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	140,625	125,000	109,375	93,750	78,125	62,500
ROI	3,983	3,866	3,749	3,630	3,510	3,389
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>49</b>	<b>50</b>	<b>51</b>	<b>52</b>	<b>53</b>	<b>54</b>
Long-Term Debt Beginning Balance	62,500	46,875	31,250	15,625	0	0
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	0	0
Long-Term Debt Ending Balance	46,875	31,250	15,625	0	0	0
ROI	3,267	3,143	3,018	2,892	0	0
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>55</b>	<b>56</b>	<b>57</b>	<b>58</b>	<b>59</b>	<b>60</b>
Long-Term Debt Beginning Balance	0	0	0	0	0	0
Long-Term Debt Repayment	0	0	0	0	0	0





## Market Opportunities

According to a recent study released by the Massachusetts Department of Public Health over 21 percent of adults in Massachusetts have used marijuana within the last 30 days. In Massachusetts, marijuana sales are expected to increase from \$106 million in 2017 to \$457 million in 2018, and eventually to \$1.4 billion in 2025, according to New Frontier Data.

The North America legal cannabis market amounted to \$12 billion in 2018, growing by 30 percent on the

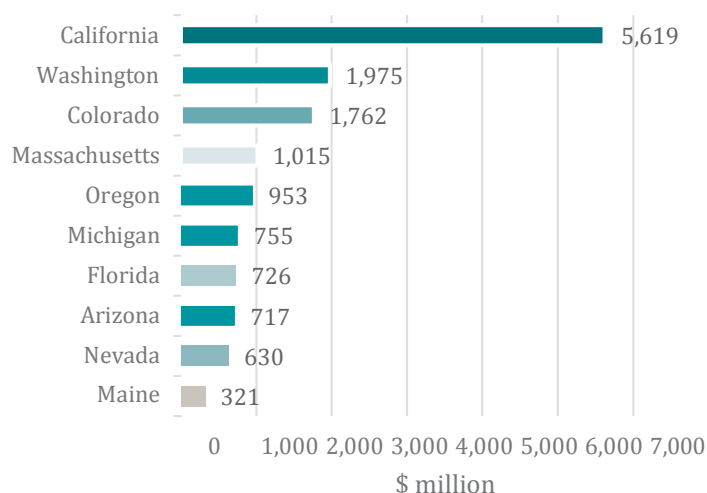


Figure 1. Medical and recreational cannabis sales in top states, 2020

year. The largest market was the United States, which totaled \$10.4 billion. It was followed by Canada with \$1.6 billion. According to the report "The Road Map to a \$57 Billion Worldwide Market"<sup>1</sup> the overall cannabis market for legal adult-use and medical sales in North America to reach \$24.5 billion by 2021 with the compound annual growth rate (CAGR) to almost 28%.

In 2015 Gov. Jerry Brown signed three bills that toughened regulations for medical cannabis businesses and sought standards

for documentation and testing.

29 States and Washington D.C have laws broadly legalizing marijuana use. Approximately 60% of Americans support the legalization of marijuana, with 89% of Americans supporting the legalization of marijuana use for medical purposes

On November 8, 2016, California voters have approved cannabis for recreational use.

On June 27, 2017, the legislature passed, and Governor Brown signed into law the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA), which creates the general framework for the regulation of both commercial medicinal and adult-use (recreational) cannabis.

On January 1, 2018, the state began issuing licenses for commercial cannabis activity. Additionally, on January 1, 2018, two new cannabis taxes went into effect: a cultivation tax on all harvested cannabis that enters the commercial market and a 15 percent excise tax on the purchase of cannabis and cannabis products.

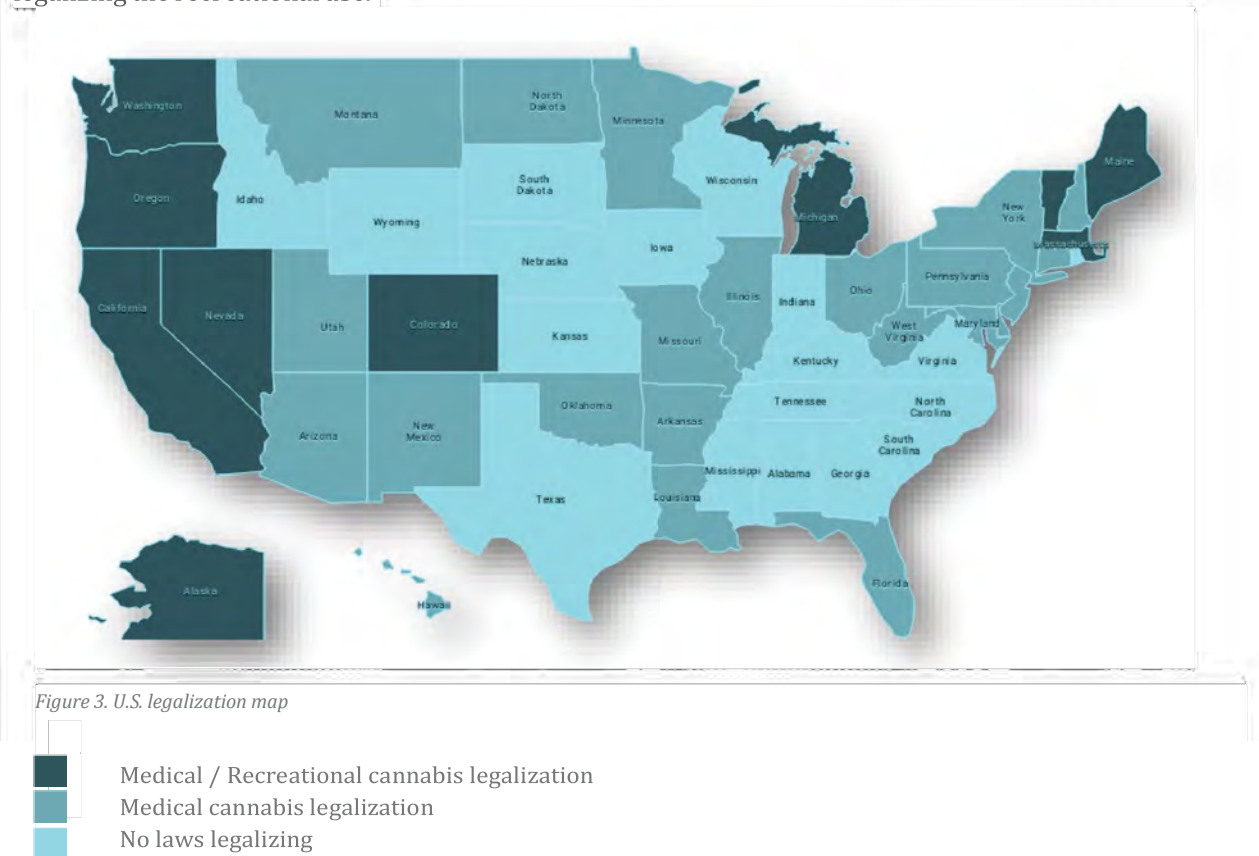
During the first six months of 2018, the number of granted licenses jumped from 1,272 licenses on January 17th to 6,421 licenses on June 30th.

According to a study by the University of California Agricultural Issues Center, California's recreational cannabis market could be worth more than \$5 billion.

<sup>1</sup><https://arcviewgroup.com/research/reports/>

## The U.S. Cannabis Market

In 2018, 62% of Americans report supporting cannabis legalization, double what it was in 2000 (31%)<sup>4</sup>. Although the use of cannabis is illegal under the federal law and the federal government classifies cannabis as a schedule 1 drug, more than 60% of the U.S. states have legalized it in some form. Most states legalized it only for medical purposes, but ten states - Alaska, California, Colorado, Maine, Michigan (2018), Nevada, Massachusetts, Oregon, Vermont and Washington - have gone further, legalizing the recreational use.



As a result, at November 2018, there are 32 States that allow cannabis for medical use, 16 States allow Cannabidiol (CBD), 10 States and the District of Columbia allow cannabis for recreational use.

<sup>4</sup> Pew Research Survey, <http://www.pewresearch.org/fact-tank/2018/10/08/americans-support-marijuana-legalization/>

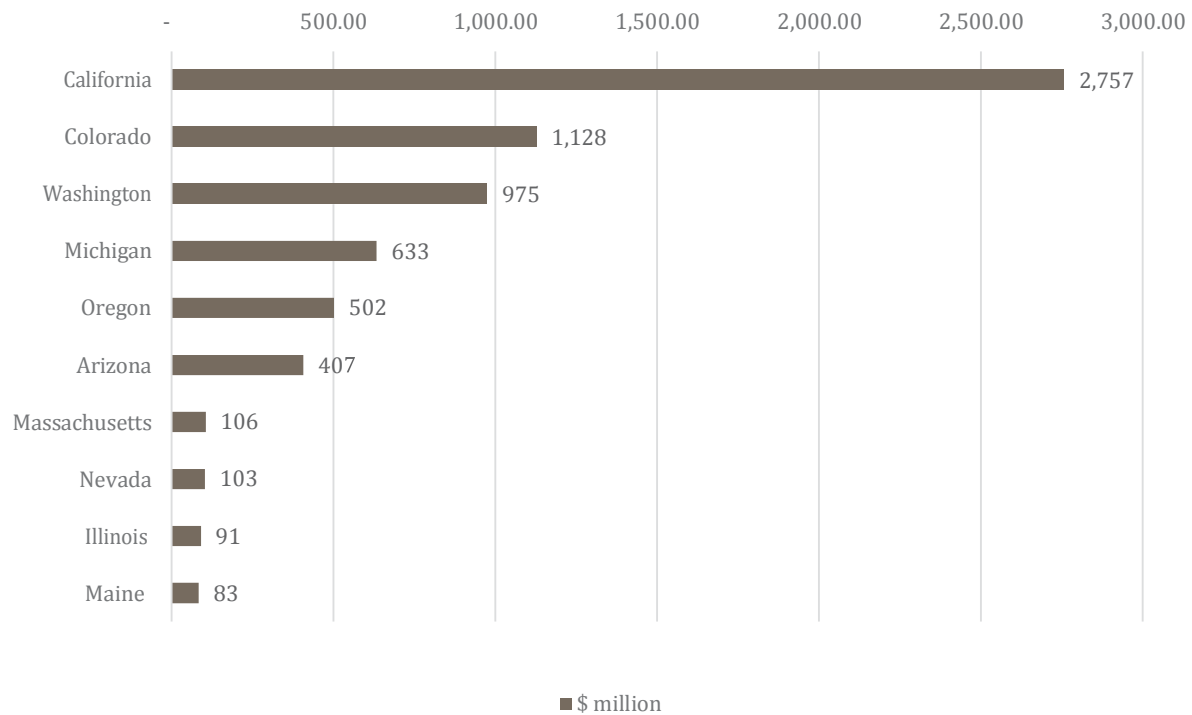


Figure 4. Medical and recreational cannabis sales in top states, 2017

There are about 10,000 active licenses for cannabis businesses in the U.S., according to Statista<sup>5</sup>. This includes cultivation, extraction and manufacturing, retail, distribution and testing licenses.

The industry employed 121,000 people in 2017 and 259,000 people in 2018. If cannabis market continues its growth trend, the number of workers in that industry could reach about 500,000 by 2022, according to New Frontier Data.

<sup>5</sup> <https://www.statista.com/statistics/596641/us-cannabis-businesses-number/>

## U.S. Cannabis Retail Market

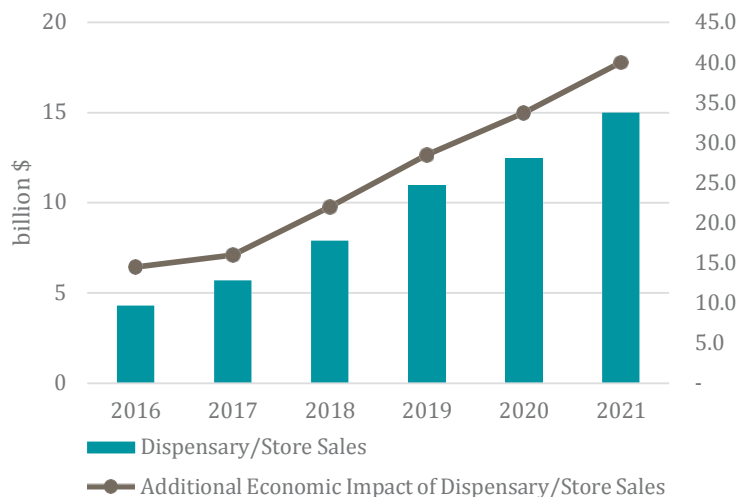


Figure 5. Cannabis retail industry economic impact

BDS Analytics estimates that the retail sector owed \$1 billion in state taxes in 2016 and another \$1.4 billion in 2017.

In 2017, overall cannabis sales in the United States at the retail level to soar by 31.5%, hitting \$5.7 billion on the back of continued growth in existing recreational cannabis markets.

In fact, rec sales are expected to surpass medical next year for the first time ever. Medical cannabis sales also are expected to buoy the industry, fueled in part by the expected launch of MMJ markets in Maryland and

Hawaii. At the same time, fledgling medical cannabis programs in states such as Illinois, Nevada and New York could post impressive growth last year.

The expected growth comes after a solid 2016, when recreational cannabis sales jumped by 80% to hit \$1.8 billion. Colorado and Washington led the charge, while Oregon's adult-use market posted strong sales gains in its first full calendar year of operation. The industry also saw a spike in medical cannabis sales last year, as patient counts rose in new MMJ states and continued climbing in mature markets like Arizona and Michigan.

The cannabis dispensary market is growing at a high rate in the United States alone, with there currently being over 1,000 open and operating dispensaries throughout the country according to data from Statista<sup>6</sup>. The growing numbers of dispensaries is a large part as to why New Frontier projects the industry to top \$25 billion in revenue by 2025.

The increase in retail sales over the next five years will provide a substantial economic boost for the United States. The total economic output from legal cannabis will grow 150% from \$16 billion in 2017 to \$40 billion by 2021, according to the "US Legal Cannabis: Driving \$40 Billion Economic Output" report released by Arcview Market Research, in partnership with BDS Analytics.

The level of sophistication and involvement among investors in the cannabis industry varies quite widely, as some belong to cannabis-specific venture capital firms while others have taken a material interest in a friend or family member's cannabis business. For example, only a handful of investors in our survey indicated they intend to invest over \$25 million in cannabis companies, whereas a large portion of respondents plan to invest less than \$20,000.

<sup>6</sup> <https://www.statista.com/statistics/754751/medical-marijuana-dispensaries-number-by-state/>

Recreational cannabis sales officially began in California and during the first six months of 2018 the number of granted licenses jumped from 1,272 licenses on January 17th to 6,421 licenses on June 30th. The number of licenses grew during the first six months of 2018:

- cultivation - 1001%
- distributor and delivery - 263% and 252%, respectively
- manufacturing - 175%
- microbusiness - 160%
- retail/dispensary - 113%
- testing licenses - 107%

### Market

In California, the weather conditions are ideal for cultivating cannabis outside, while a lot of cannabis is also grown indoors in massive warehouses. The state's marketplace is also known for its decades-long experience developing cannabis strains. Third-generation growers and breeders have some unparalleled knowledge of the plant and of the related regulatory environment compared to other states.

In 2017, California's regulatory regime allowed only holding state-issued medical cannabis cards to legally purchase cannabis. But that hasn't stopped sales in the state from eclipsing the other states with recreational sales.

California state dispensaries sold \$2,757 million worth of cannabis products, compared to \$1,129 million in Colorado's robust cannabis marketplace, \$975 million in Washington, and \$502 million in Oregon.

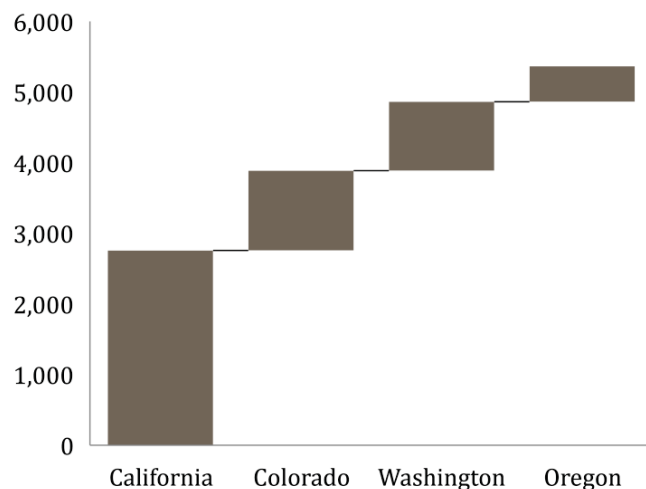
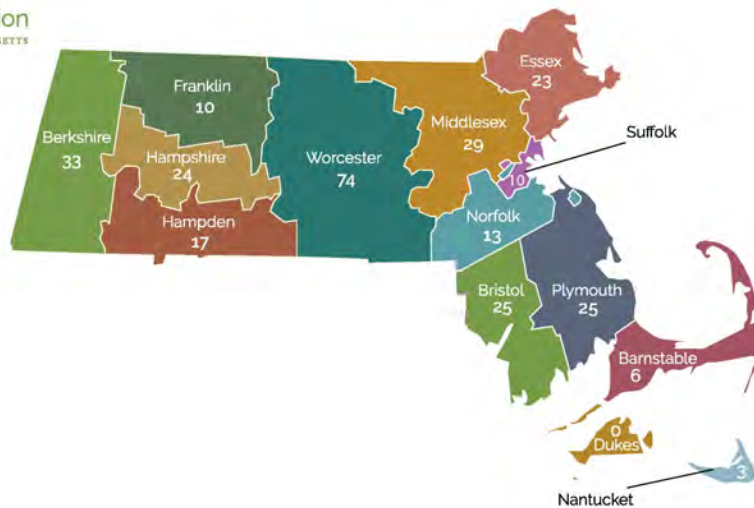


Figure 6. Medical and recreational cannabis sales in top states, 2017

In fact, sales in California represented about 34 percent of legal sales in the United States. In

comparison, combined sales in Colorado, Washington and Oregon represent 41 percent of U.S. sales according to BDS Analytics report.



As of February 21, 2015

## Massachusetts Cannabis Market

In 2008 Massachusetts voters decriminalized the possession of small amounts of cannabis and in 2012 Massachusetts became the 18th state to legalize medical cannabis through a ballot.

In November 2016, Massachusetts voters approved Question 4, the initiative to legalize the recreational use of cannabis for adults 21 years of age and older. In December 2016, the Massachusetts state legislature voted to delay sales of recreational cannabis for six months. Originally, licensing for cannabis shops was set to begin in January 2018, but the delay moved the date and first retail cannabis business opened in Massachusetts in November 2018.

In 2018, there were over 60,000 (up from 19,000 in early 2016) people who have gotten medical cannabis cards that allow them to use medical cannabis legally to treat a variety of ailments. They were served by 47 medical cannabis dispensaries.

As of August 2019, 318 pending applications have been submitted, including 127 retailer, 96 cultivator, 74 manufacturer, 9 micro-business, 3 transporter, 3 testing licenses, 4 research facilities and 2 craft marijuana cooperative, and 185 licenses have been awarded, including 71 retailer, 56 cultivator, 48 manufacturer, 4 micro-business, 3 transporter and 3 testing licenses. The review process includes a background check and a 60-day window during which the municipality in which the business hopes to locate must certify that the applicant has met all local requirements.

Cannabis stores sold about \$9.3 million worth of cannabis products during the first month and in August 2019 total legal cannabis sales exceeded \$230 million, according to figures released by the Cannabis Control Commission.

It is expected over 700,000 customers potentially interested in using of a recreational cannabis. According to the Department of Revenue analysis, in the first 12 months of the program, Massachusetts could expect to see between \$45 million and \$83 million in tax revenue from the sale of recreational cannabis – with an estimated \$64 million in the middle of that range. In the second year, Massachusetts could expect tax revenue between \$93 million and \$172 million, on sales ranging between \$707 million and \$1.3 billion.

Research from multiple cannabis data and investment firms predict Massachusetts can become such a travel destination.

#### Cannabis Taxes.

Under the new law, recreational cannabis is taxed 17 to 20%. The baseline tax is 17%, which is determined from a combination of a 6.25% sales tax and a 10.75% special excise tax on adult use. Cities and towns can choose to add a 3% tax on top of the 17%, tallying up to a 20% tax on retail cannabis.

As of February 2019, 303 prospective cannabis businesses have submitted at least one “packet” of the application to the CCC including 130 retailer, 87 cultivator, 44 manufacturer, 12 micro-business, 11 transporter and 4 testing licenses. The review process includes a background check and a 60-day window during which the municipality in which the business hopes to locate must certify that the applicant has met all local requirements.

Massachusetts law requires all cannabis products to be independently tested for potency and possible contaminants before they’re sold. The state already has testing facilities for medical cannabis, but those laboratories must obtain separate licenses to test recreational cannabis.

## SWOT Analyses

S	W	O	T
<ul style="list-style-type: none"> <li>• Building of relationships with indoor cultivators, concentrates and edibles manufactures across Massachusetts</li> <li>• Diversified, Strategic Partnerships</li> <li>• Extensive industry knowledge</li> </ul>	<ul style="list-style-type: none"> <li>• Enhanced risk of banking / financial / IRS scrutiny</li> <li>• Lack in professional workforce for a cannabis industry</li> <li>• High starting capital</li> <li>• Limited to Zoning Local Bond Requirement's</li> </ul>	<ul style="list-style-type: none"> <li>• High growth industry</li> <li>• Growing interest and demand for natural, alternative medicine</li> <li>• Trend toward greater cannabis legalization, including the use of cannabis for recreational purposes</li> <li>• A significant drop in wholesale pricing</li> </ul>	<ul style="list-style-type: none"> <li>• Enforcement of federal law</li> <li>• Possible cannabis law changing</li> <li>• Indicators of a slowed global economy</li> <li>• Large companies entering the market</li> <li>• Crossborder shipping</li> </ul>





# Marketing Strategy

## Marketing Plan

Because cannabis is illegal under federal law, state governments and online advertising platforms are placing strict rules on how companies can market their products.

Google, Facebook and Twitter all have advertising policies that restrict the promotion of the sale of cannabis. Google's policy prohibits ads that promote "substances that alter mental state for the purpose of recreation." Facebook restricts any "illegal, prescription, or recreational drugs." And Twitter bans "illegal drugs" as well as substances that cause "legal highs." Instagram and Facebook have decided to go a step further by removing pages of cannabis related businesses.

The most effective strategies for legal cannabis companies are direct marketing at industry conferences and other events, building communities around cannabis -related concerns such as health and wellness. The marketing and sales strategy of Holistic Concepts dispensary/retail store will be based on generating long-term personalized relationships with growers and manufactures.

Marketing and advertising campaign includes:

- Meeting with growers and manufactures
- E-mail Marketing
- Advertising and articles in the thematic Magazines, in cluding:
  - Cannabis Now
  - 420 Magazine
  - Marijuana Venture
  - MG Magazine
- Business events and conferences
- Business and industry associations
- Brand development
- Brochures
- Website development with search engine optimizatio n
  - Keywords
  - Fresh content
  - Menu Integration
  - Online order and Pickup
  - Online Wait time check
  - Strain Tracker App
- Cannabis business directories and platforms.

Table 3. Cannabis business directories

WEEDMAP <a href="https://weedmaps.com/">https://weedmaps.com/</a>	Cannabis dispensary/store finder on the planet. With over 7,750 listings throughout the U.S., Canada, and Europe.	WeedMaps has 7.96 million total visits each month.
LEAFY <a href="https://www.leafly.com/">https://www.leafly.com/</a>	Leafy is a cannabis information resource for finding the right strains and products. Services include: cannabis finder, online store, branding, doctors' portal.	Leafy has 226.27 thousand total visits each month.

**Company Logo Sample: Not Final See Exhibit E**

## Target Customers

Aside from the cannabis which is our core product, The Holistic Concepts dispensary/retail store will retail a wide range of Cannabis Infused products to customers who are based in MA, Brockton and any other surrounding cities where our stores will be opened. We will also engage in the sale of apparel, and a wide variety of CCC authorized products, etc.

The Holistic Concepts dispensary/retail store will ensure that all our customers are given first class treatment whenever they visit our store. We have a CRM software that will enable us to manage a one-on-one relationship with our customers no matter how large our Customer base grows. We will ensure that we get our customers involved in their own personal health decisions to make the right choices for their unique needs.

The market potential for cannabis products in California is estimated between 15 million and 21 million adults over 21 years of age. While 39% of Californians already use cannabis, another 44% are non-users interested in trying it now that it's recreationally legal. Massachusetts is on pace to reach these types of percents of population

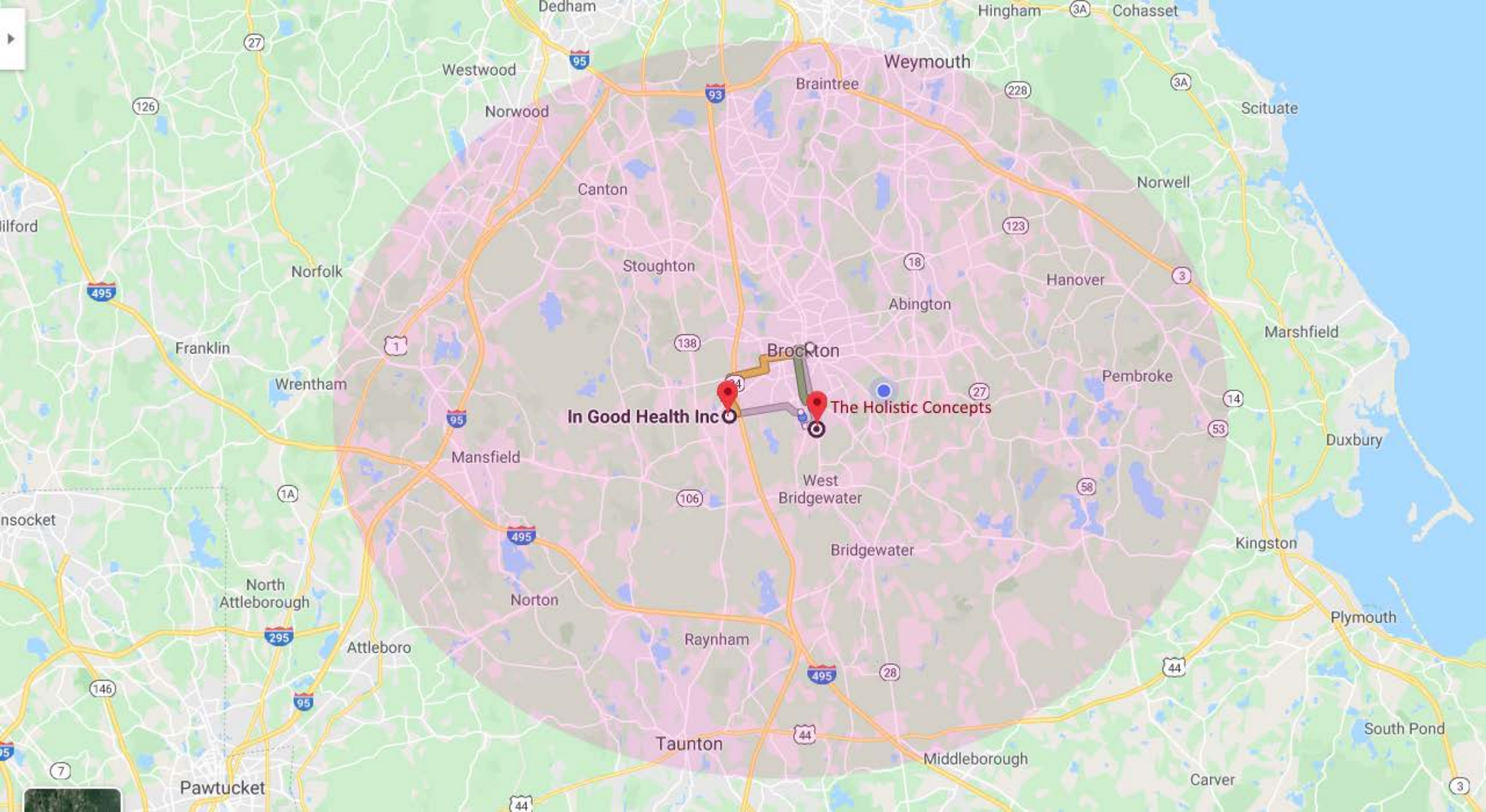
## SERVICE AREA

The City of Brockton's population is approximately 96,000, with the population of Plymouth County being approximately 515,000. Based on the projections and the total number of existing Adult use Marijuana locations in the city, The Holistic Concepts are estimating to serving up to 60,000 customers annually for approximately the first 3 years. According to those projections, there will be 175 customers per day calculating to roughly 18-22 customers an hour. Each of these customers spend an average time of 10-15 mins inside the facility.

The Holistic Concepts' target customers are consumers 21 years of age or older who live, work and visit the City of Brockton and the surrounding communities who are seeking to purchase high-quality marijuana and cannabis based products in a secure, professional, welcoming retail establishment. We are anticipating that the surrounding towns bordering the proposed location will include but not limited to South Side of Brockton, Bridgewater, East Bridgewater and any towns that have the accessibility off Route 24 and Rte. 106. The Holistic Concepts proposed location at 1915 Main St. In Brockton which is located a few minutes off of Rte. 106 Via Route 24 so the anticipated customers could possibly come from a range of near and far communities. Please refer to Map attached to see the range in which The Holistic Concepts plans to conduct business

Within the service area, there is In Good Health located at 1200 West Chestnut St, Brockton MA as the only existing dispensary. There is another CCC approved dispensary named Commonwealth Alternative Care to also be located on west chestnut st.







# Operating Plan

# Operating Plan

## **Dispensary/Retail Store Location and Facilities (See Exhibit F for Detailed Plan)**

### **Location and Building Specifications**

The Holistic Concepts has executed a Purchase and Sale for the Building located at 1915 Main st. Brockton formerly "Jiffy Lube" for use as a Marijuana Retailer Establishment. 1915 Main St. is a 2,400 square foot commercial building that was previously used as a quick server oil change business.

Although the building is in good condition, The Holistic Concepts intends to make significant modifications to the facility to renovate interior and exterior conditions and install state-of-the-art security systems. There is ample existing parking on site for customers and staff.

The Holistic Concepts' facility will be designed with the specific intentions of ensuring consumer and client safety; promoting a smooth flow of business throughout the facility; eliminating queuing; and incorporating design nuance that is intended to facilitate one-on-one conversations between customer service representatives and customers. The Holistic Concepts will meticulously invest in security, interior design, exterior design, quality control, product testing, and staff training.

The Holistic Concepts plans to obtain the marijuana flower and marijuana products to be sold at its Retailer Establishment from other licensed Marijuana Cultivator and Product Manufacturer Establishments in the Commonwealth.

### **Inventory Procedures (See Exhibit B) for Detailed Procedures**

The Holistic Concepts will establish inventory controls and procedures for reviewing comprehensive inventories of marijuana products; conduct a monthly inventory of finished, stored marijuana, stored marijuana; conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and promptly transcribe inventories if taken by use of an oral recording device.

The Holistic Concepts will track all marijuana products using a seed-to-sale methodology in a form and manner approved by the Commission. Such procedures have a well-established track record in the industry of preventing internal diversion of product.

## **Lighting**

The main objectives of our security lighting system at the store is to illuminate dark areas and detect and recognize movement in the protected area. The best vision with outdoor lighting is obtained from downward directed and shielded security lighting that is constantly on, supplemented with instant-on lighting triggered by motion detectors.

The Holistic Concepts will ensure that sufficient lighting requirements are met between dusk and dawn.

The Holistic Concepts will add external security lighting, including high flood spot lights to both facilities. Each facility and all walkways of each facility will be well illuminated to maximize visibility. Lighting will be operated automatically by a photo-sensor, ensuring that lighting will always be optimal for video capture.

## **Guards**

Once our facility is operational, we will employ a CCC compliant security company , a private company that will provide security guards. Uniformed unarmed security personnel will be on site monitoring the facility during hours of operation. All security personnel will be thoroughly screened, trained, and strictly supervised by our Security Department working in conjunction with a Security Consultant to ensure they are of the highest capability.

During our operating hours of M-F 8am to 8pm and Saturday 8am to 8pm , we will have at least one or total of two on-site security guards at the entrance and one on-site security guards at the store. Security personnel will perform and keep records of having performed routine regular inspections of all security systems, barriers, gates, doors, and locks, immediately reporting any malfunctioning or compromised security feature to the Security Agent. Any incidents qualifying as irregular or suspicious will be handled immediately.

**Physical Security Plan for detailed plan see (Exhibit A)**



# Quality Control and Testing

## **Quality Control**

The Holistic Concepts, INC ("Holistic Concepts") will comply with the following sanitary requirements any Holistic Concepts agent working in direct contact with marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:

- Maintaining adequate personal cleanliness; and
- Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
- Holistic Concepts' hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand- washing facilities will be located in Holistic Concepts' employee only areas and where good sanitary practices require employees to wash and sanitize their hands and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices.
- Holistic Concepts' facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
- Holistic Concepts will 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 will be maintained in an
- Holistic Concepts' facility will have adequate safety lighting in all processing and storage areas.:
- Holistic Concepts' buildings fixtures and other physical facilities will be

## **Maintained in a sanitary condition:**

- Holistic Concepts will ensure that all contact surfaces, and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;
- All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products;
- Holistic Concepts will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
- Holistic Concepts will ensure that Holistic Concepts' facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

**Recalls/Spoilage**

- Holistic Concepts will 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 Holistic Concepts 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 will be disposed of in accordance with the provisions of 935 CMR 500.105(12), and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

**Testing**

- Holistic Concepts will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

**Purchase Limits**

Holistic Concepts will follow all CCC guidelines for Sales limits of Cannabis based products and Flowers. This includes but will not be limited to Quantities on weight and THC limits on edibles and extracts.

## Transportation and Tracking Solution

THC intends to use special tracking solution, which will allow us to remain compliant while helping to identify key data points to streamline and optimize inventory management at each phase of the operation: transportation, lab testing and dispensing.

**Transport Manifests** - Creating, submitting, and storing compliant transportation manifests noting vehicle, driver, and cargo contained for regulatory review Gps will also be utilized.

**Product Details** - Product details for the inventory items, printing key information directly on the labels including ingredients, potency results, plus a reactive expiration date that can lock a product if it's past expiration.

**Inventory Management** - Analyzing the sales data to optimize the dispensary/retail store inventory to the customers.

**Data Driven CRM** - Out-of-the-Box Customer Relationship Management (CRM) tools to reward loyal customers and referrals. Setup targeted email and text campaigns based on customer's favorite products, last visit date, purchase history, birthdays and more.



# Organizational Structure

## Organizational Structure

The Holistic Concepts

is a business that will be built on a solid foundation. From the outset, we have decided to recruit only qualified people to man various job positions in our company. We are quite aware of the rules and regulations governing the cannabis industry of which cannabis dispensing falls under which is why we decided to recruit experienced and qualify employees as foundational staff of the organization. We hope to leverage on their expertise to build our business brand to be well accepted in the United States.

These are the positions that will be available at The Holistic Concept:

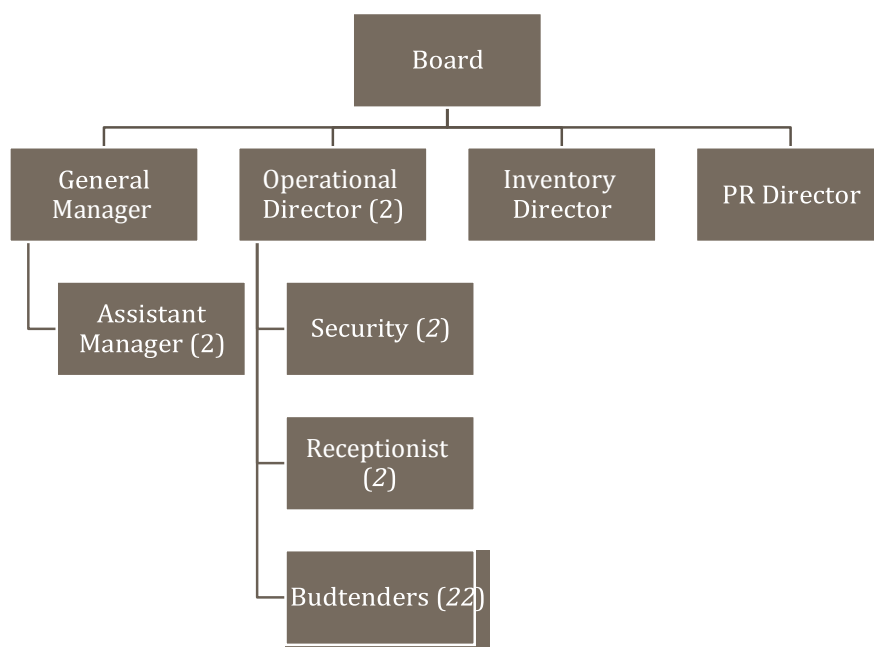


Figure 11. Organizational structure

Table 5. Personnel plan



# Financial Plan

The Holistic Concepts will be mainly funded from its owners In the Sum of \$750,000. All owners have equity in personal property that will be leveraged to purchase and fund the Adult Retail Location



## Profit&Loss Statement

	\$	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5	YEAR 6	YEAR 7
Revenue		2,157,833	4,125,000	5,267,167	6,072,000	6,864,000	7,656,000	8,448,000
COGS - Cost of Goods Sold		1,015,510	1,776,724	2,268,680	2,615,338	2,956,469	3,297,601	3,638,732
<b>Gross Profit</b>		1,142,323	2,348,276	2,998,487	3,456,662	3,907,531	4,358,399	4,809,268
% of revenue		53%	57%	57%	57%	57%	57%	57%
SG&A Expenses								
G&A Expenses - Initial & General Costs		142,500	114,088	114,088	114,088	114,088	114,088	114,088
G&A Expenses - Retail		188,617	301,425	307,136	311,160	315,120	319,080	323,040
SG&A Expenses - Marketing & Sales Expenses		205,353	253,474	232,184	210,968	200,360	200,360	200,360
Senior Management Salaries & Benefits		235,033	235,033	235,033	235,033	235,033	235,033	235,033
IT Salaries & Benefits		0	0	0	0	0	0	0
Other Salaries & Benefits		0	0	0	0	0	0	0
SG&A Expenses - Misc.		11,941	14,940	14,156	13,640	13,441	13,560	13,679
Total SG&A Expenses		783,443	918,959	902,596	884,888	878,041	882,120	886,199
<b>Operating Income (EBITDA)</b>		358,881	1,429,316	2,095,891	2,571,773	3,029,490	3,476,280	3,923,070
% of revenue		17%	35%	40%	42%	44%	45%	46%
Depreciation and Amortization		13,292	13,292	13,292	13,292	13,292	13,292	13,292
<b>Earnings Before Interest &amp; Taxes (EBIT)</b>		345,588	1,416,024	2,082,599	2,558,481	3,016,197	3,462,987	3,909,777
Interest Expense		(81,861)	(77,953)	(64,060)	(48,404)	(12,320)	0	0
<b>Earnings Before Taxes (EBT)</b>		263,728	1,338,071	2,018,539	2,510,076	3,003,878	3,462,987	3,909,777
Income Tax		268,898	640,326	851,722	1,002,007	1,151,008	1,296,192	1,440,022
<b>Net Income</b>		(5,170)	697,745	1,166,817	1,508,069	1,852,870	2,166,795	2,469,756
% of revenue		0%	17%	22%	25%	27%	28%	29%

## Cash Flows Statement

	\$	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5	YEAR 6	YEAR 7
<b>Net Income</b>		(5,170)	697,745	1,166,817	1,508,069	1,852,870	2,166,795	2,469,756
<b>Cash Flow from Operations</b>								
Depreciation		13,292	13,292	13,292	13,292	13,292	13,292	13,292
Change in Receivables		(130,167)	(77,000)	(12,833)	(33,000)	(33,000)	(33,000)	(33,000)
Change in Inventory		(63,298)	(37,786)	(6,875)	(16,194)	(16,194)	(16,194)	(16,194)
Change in Accounts Payable		63,298	37,786	6,875	16,194	16,194	16,194	16,194
<b>Total Cash Flow from Operations</b>		(122,045)	634,038	1,167,276	1,488,361	1,833,162	2,147,087	2,450,048
<b>Cash Flow from Investing</b>								
Capital Expenditures (CAPX)		(297,200)	0	0	0	0	0	0
Other		0	0	0	0	0	0	0
<b>Total Cash Flow from Investing</b>		(297,200)	0	0	0	0	0	0
<b>Cash Flow from Financing</b>								
Revolver Issuance / (Repayment)		750,000	0	0	0	0	0	0
Long-Term Debt Issuance / (Repayment)		(125,000)	(187,500)	(187,500)	(187,500)	(62,500)	0	0
Paid in Capital		0	0	0	0	0	0	0
Drawings (profit share)		0	0	0	0	0	0	0
<b>Total Cash Flow from Financing</b>		625,000	(187,500)	(187,500)	(187,500)	(62,500)	0	0
<b>Total Change in Cash</b>		205,755	446,538	979,776	1,300,861	1,770,662	2,147,087	2,450,048
<b>Beginning Period Cash</b>		0	205,755	652,293	1,632,070	2,932,931	4,703,593	6,850,680
<b>Ending Period Cash</b>		205,755	652,293	1,632,070	2,932,931	4,703,593	6,850,680	9,300,728

## Balance Sheet

\$	YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5	YEAR 6	YEAR 7
<b>Assets</b>							
Current Assets							
Cash	205,755	652,293	1,632,070	2,932,931	4,703,593	6,850,680	9,300,728
Receivables	130,167	207,167	220,000	253,000	286,000	319,000	352,000
Inventory	63,298	101,084	107,959	124,152	140,346	156,540	172,734
Total Current Assets	399,220	960,543	1,960,028	3,310,083	5,129,939	7,326,220	9,825,462
Long Term Assets							
Property Plant & Equipment (PPE), gross	297,200	297,200	297,200	297,200	297,200	297,200	297,200
Accumulated Depreciation of PPE	(13,292)	(26,585)	(39,877)	(53,169)	(66,462)	(79,754)	(93,046)
PP&E, net	283,908	270,615	257,323	244,031	230,738	217,446	204,154
<b>Total Assets</b>	<b>683,128</b>	<b>1,231,159</b>	<b>2,217,351</b>	<b>3,554,114</b>	<b>5,360,678</b>	<b>7,543,666</b>	<b>10,029,616</b>
<b>Liabilities</b>							
Current Liabilities							
Accounts Payable	63,298	101,084	107,959	124,152	140,346	156,540	172,734
Total Current Liabilities	63,298	101,084	107,959	124,152	140,346	156,540	172,734
Long Term Liabilities	625,000	437,500	250,000	62,500	0	0	0
<b>Total Liabilities</b>	<b>688,298</b>	<b>538,584</b>	<b>357,959</b>	<b>186,652</b>	<b>140,346</b>	<b>156,540</b>	<b>172,734</b>
<b>Equity</b>							
Paid-in Capital/Drawings	0	0	0	0	0	0	0
Retained Earnings	(5,170)	692,575	1,859,393	3,367,462	5,220,331	7,387,126	9,856,882
Current Period Retained Earnings	(5,170)	692,575	1,859,393	3,367,462	5,220,331	7,387,126	9,856,882
Total Equity	(5,170)	692,575	1,859,393	3,367,462	5,220,331	7,387,126	9,856,882
<b>Total Liabilities and Equity</b>	<b>683,128</b>	<b>1,231,159</b>	<b>2,217,351</b>	<b>3,554,114</b>	<b>5,360,678</b>	<b>7,543,666</b>	<b>10,029,616</b>

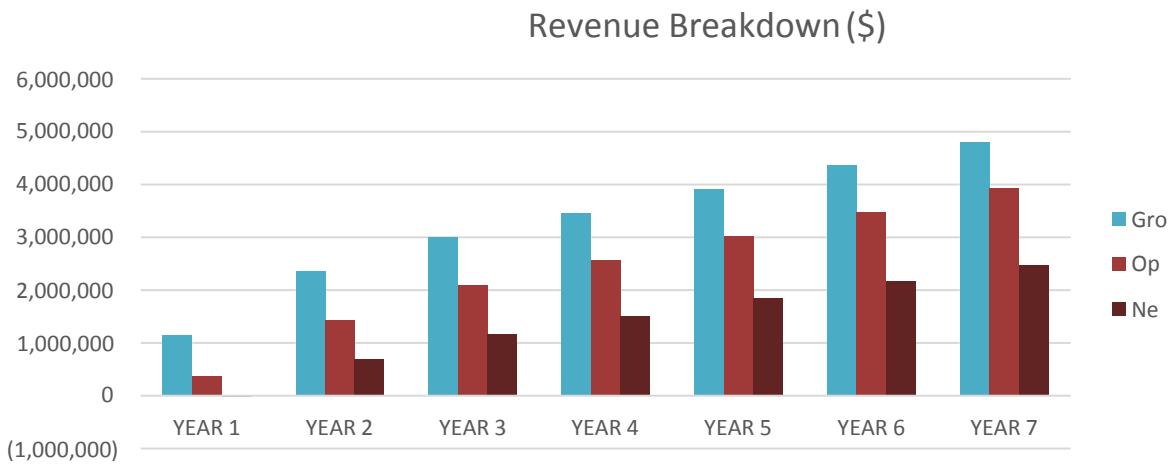
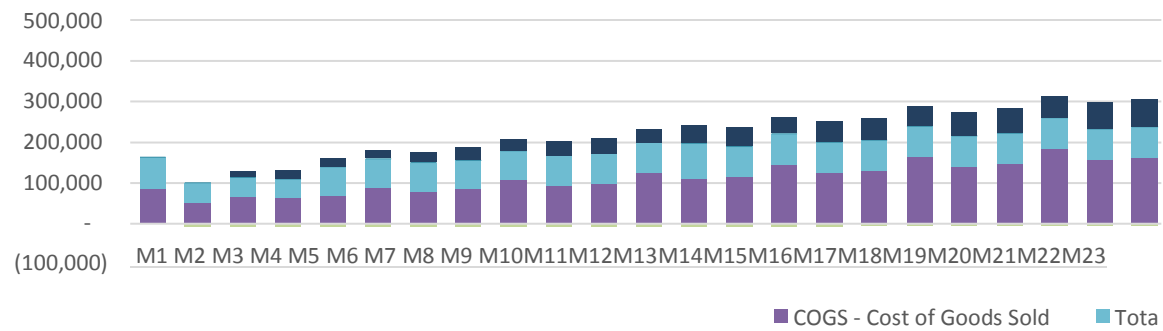
## Ratios

Ratio Analysis	Year 2	Year 3	Year 4	Year 5	Avg. (2-5 years)	Avg (3-5 years)
<b>Return on Equity</b>	203.0%	91.4%	57.7%	43.2%	<b>98.8%</b>	<b>64.1%</b>
Return on Assets	67.4%	65.1%	51.1%	41.4%	<b>56.3%</b>	<b>52.5%</b>
Financial Leverage	2.78	1.35	1.10	1.04	<b>1.57</b>	<b>1.16</b>
Correction Factor	1.08	1.04	1.02	1.00	<b>1.04</b>	<b>1.02</b>
<b>Return on Assets</b>						
Return on Sales	15.6%	21.3%	24.3%	26.9%	<b>22.0%</b>	<b>24.2%</b>
Asset turnover	4.31	3.05	2.10	1.54	<b>2.75</b>	<b>2.23</b>
<b>Profitability</b>						
Gross margin	56.9%	56.9%	56.9%	56.9%	<b>56.9%</b>	<b>56.9%</b>
SG&A as % of Sales	22.3%	17.1%	14.6%	12.8%	<b>16.7%</b>	<b>14.8%</b>
Operating Margin	34.3%	39.5%	42.1%	43.9%	<b>40.0%</b>	<b>41.9%</b>
Interest Expense as % of Sales	1.9%	1.2%	0.8%	0.2%	<b>1.0%</b>	<b>0.7%</b>
Effective Tax Rate	47.9%	42.2%	39.9%	38.3%	<b>42.1%</b>	<b>40.1%</b>
<b>Asset Turnover Ratios</b>						
Accounts Receivable Turnover	24.5	24.7	25.7	25.5	<b>25.1</b>	<b>25.3</b>
Inventory Turnover	21.6	21.7	22.5	22.4	<b>22.1</b>	<b>22.2</b>
Accounts Payable Turnover	22.1	21.8	22.7	22.5	<b>22.3</b>	<b>22.3</b>
Fixed Asset Turnover	14.9	20.0	24.2	28.9	<b>22.0</b>	<b>24.4</b>
<b>Days Turnover Ratios</b>						
Days Receivables	14.9	14.8	14.2	14.3	<b>14.6</b>	<b>14.4</b>
Days Inventory	16.9	16.8	16.2	16.3	<b>16.6</b>	<b>16.4</b>
Days Payables	16.5	16.8	16.1	16.2	<b>16.4</b>	<b>16.4</b>
Net Trade Cycle	15.3	14.9	14.3	14.4	<b>14.7</b>	<b>14.5</b>
<b>Liquidity Analysis</b>						
Solvency Ratio	1.32	3.30	8.15	13.30	<b>6.5</b>	<b>8.2</b>
Current Ratio	9.50	18.16	26.66	36.55	<b>22.7</b>	<b>27.1</b>
Quick Ratio	8.50	17.16	25.66	35.55	<b>21.7</b>	<b>26.1</b>
CFO-to-Current Liabilities	7.71	11.17	12.82	13.86	<b>11.4</b>	<b>12.6</b>
Interest Coverage	18.34	32.72	53.13	245.91	<b>87.5</b>	<b>110.6</b>
Cash Interest Coverage	17.35	32.52	52.45	243.23	<b>86.4</b>	<b>109.4</b>
Debt to Equity	0.78	0.19	0.06	0.03	<b>0.3</b>	<b>0.1</b>
Long-Term-Debt to Equity	0.63	0.13	0.02		<b>0.2</b>	<b>0.1</b>
Long-Term Debt to Tangible Assets	0.36	0.11	0.02		<b>0.1</b>	<b>0.0</b>
<b>Other Information</b>						
Sales Growth	91.2%	27.7%	15.3%	13.0%	<b>36.8%</b>	<b>18.7%</b>
Statutory Tax Rate	32.0%	32.0%	32.0%	32.0%	<b>32.0%</b>	<b>32.0%</b>
De-levered Net Income	644,737	1,123,257	1,475,154	1,844,492		
Purchases	1,814,510	2,275,555	2,631,532	2,972,663		
Weighted Avg Depreciation Rate	4.5%	4.5%	4.5%	4.5%	<b>4.5%</b>	<b>4.5%</b>
Weighted Avg Interest Rate	14.7%	18.6%	31.0%	39.4%	<b>25.9%</b>	<b>29.7%</b>

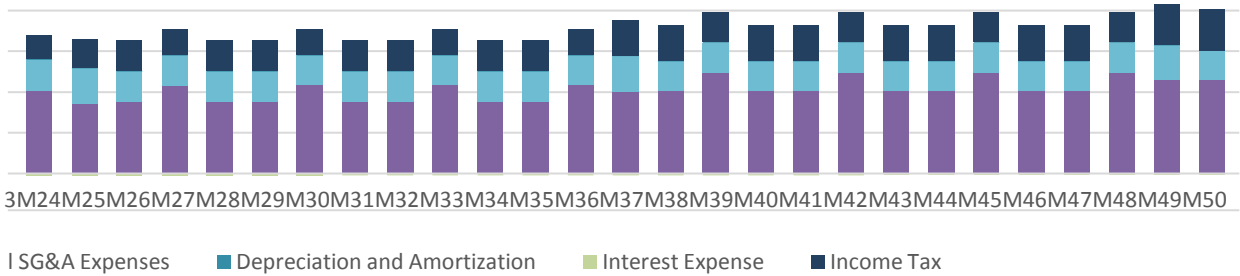
## Summary

	\$	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Total Revenues		2,157,833	4,125,000	5,267,167	6,072,000	6,864,000	7,656,000	8,448,000
Total Cost of Goods Sold		-1,015,510	-1,776,724	-2,268,680	-2,615,338	-2,956,469	-3,297,601	-3,638,732
Total Operating Expenses		-796,735	-932,251	-915,888	-898,181	-891,333	-895,412	-899,491
EBITDA		358,881	1,429,316	2,095,891	2,571,773	3,029,490	3,476,280	3,923,070
Interest Expense		-81,861	-77,953	-64,060	-48,404	-12,320		
Net Income		-5,170	697,745	1,166,817	1,508,069	1,852,870	2,166,795	2,469,756
Cash		205,755	652,293	1,632,070	2,932,931	4,703,593	6,850,680	9,300,728
Total Assets		683,128	1,231,159	2,217,351	3,554,114	5,360,678	7,543,666	10,029,616
Revolver (Short-Term Debt)								
Long-Term Debt		625,000	437,500	250,000	62,500			
Total Shareholder's Equity		-5,170	692,575	1,859,393	3,367,462	5,220,331	7,387,126	9,856,882
<b>NPV</b>								
Total Cash Flow from (to) Operations		-122,045	634,038	1,167,276	1,488,361	1,833,162	2,147,087	2,450,048
Total Cash Flow from (to) Investing		-297,200						
Unlevered Free Cash Flow		-337,384	711,991	1,231,336	1,536,766	1,845,482	2,147,087	2,450,048
Present Value of Unlevered Free Cash Flow		-293,377	538,367	809,623	878,651	917,531	928,245	921,064
Terminal Value				10,568,968		15,840,384		21,029,578
Present Value of Terminal Value				6,949,268		7,875,470		7,905,797
NPV based on terminal year 3			8,003,882					
NPV based on terminal year 5			10,726,265					
NPV based on terminal year 7			12,605,901					

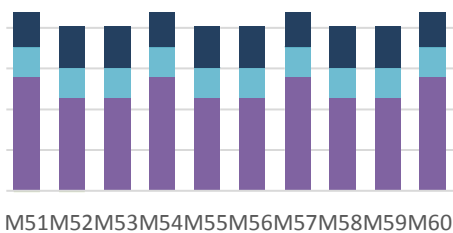
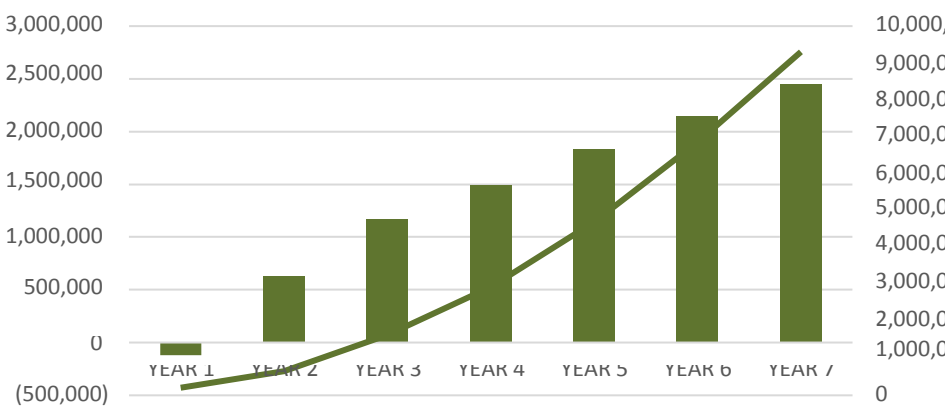
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Monthly Burn Rate



Cash Flow (\$)





Executive Summary Startup Table

	\$ Quarter 1	Quarter 2	Quarter 3	Quarter 4
CAPEX				
Land & Development	92,000	0	0	0
Equipment including finishing/painting	97,200	0	0	0
Equipment including multiple camera	43,200	0	0	0
Furniture, Display Counters, Refrigerators	39,600	0	0	0
Cost for Computer Software (Accounting Software)	7,200	0	0	0
Exterior	0	0	0	0
Access control	5,500	0	0	0
Security System	12,500	0	0	0
Other	0	0	0	0
Other	0	0	0	0
OPEX				
Direct Costs	205,324	220,314	270,062	319,810
Initial & General Costs	69,600	24,300	24,300	24,300
Operating Expenses, including salaries	58,758	105,527	129,393	129,971
Marketing & Sales Expenses	40,464	54,963	54,963	54,963
Misc.	1,341	3,050	3,766	3,783
Total	672,686	408,154	482,484	532,828

Required Investments=750,000

Executive Summary Direct and Indirect Impacts Table

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
Federal Tax	239,888	493,138	629,682	725,899	820,581	915,264	1,009,946
State Tax	29,010	147,188	222,039	276,108	330,427	380,929	430,076
Community programs	8,617	20,625	26,336	30,360	34,320	38,280	42,240

Sales Forecast

	\$ Flower	Concentrates	Edibles	Topicals	Other
Year 1	1,402,592	539,458	168,311	12,947	34,525
Year 2	2,681,250	1,031,250	321,750	24,750	66,000
Year 3	3,423,658	1,316,792	410,839	31,603	84,275
Year 4	3,946,800	1,518,000	473,616	36,432	97,152
Year 5	4,461,600	1,716,000	535,392	41,184	109,824
Year 6	4,976,400	1,914,000	597,168	45,936	122,496
Year 7	5,491,200	2,112,000	658,944	50,688	135,168

	\$ 1m	2m	3m	4m	5m	6m
Year 1	0	132,000	144,833	157,667	170,500	183,333
	7m	8m	9m	10m	11m	12m
Year 1	196,167	209,000	221,833	234,667	247,500	260,333
	1m	2m	3m	4m	5m	6m
Year 2	273,167	286,000	298,833	311,667	324,500	337,333
	7m	8m	9m	10m	11m	12m
Year 2	350,167	363,000	375,833	388,667	401,500	414,333
	1m	2m	3m	4m	5m	6m
Year 3	427,167	440,000	440,000	440,000	440,000	440,000
	7m	8m	9m	10m	11m	12m
Year 3	440,000	440,000	440,000	440,000	440,000	440,000

Direct Costs

	\$ Year 1	Year 2	Year 3	Year 4	Year 5
Products Purchase					

Executive Summary Charts Data

	Revenue	Gross Profit	Net Income
Year 1	2,157,833	1,142,323	-5,170
Year 2	4,125,000	2,348,276	697,745
Year 3	5,267,167	2,998,487	1,166,817
Year 4	6,072,000	3,456,662	1,508,069
Year 5	6,864,000	3,907,531	1,852,870

	Operational Cash	Ending Period Cash
Year 1	-122,045	205,755
Year 2	634,038	652,293
Year 3	1,167,276	1,632,070
Year 4	1,488,361	2,932,931
Year 5	1,833,162	4,703,593

Flowers	552,948	1,057,037	1,349,719	1,555,958	1,758,909
Concentrates	215,783	412,500	526,717	607,200	686,400
Beverages & Edibles	67,324	128,700	164,336	189,446	214,157
Topicals	5,179	9,900	12,641	14,573	16,474
Other	13,810	26,400	33,710	38,861	43,930
<b>Delivery Costs</b>					
Delivery costs	7,193	13,750	17,557	20,240	22,880
Fuel	2,452	4,688	5,985	6,900	7,800
Other delivery costs	0	0	0	0	0
<b>Other Direct Costs</b>					
Other direct costs	0	0	0	0	0
Initial inventory	86,086	0	0	0	0
Other direct costs	0	0	0	0	0
Other direct costs	0	0	0	0	0
<b>Taxes</b>					
City of Brockton Cannabis Business Tax (	64,735	123,750	158,015	182,160	205,920
<b>Total</b>	<b>1,015,510</b>	<b>1,776,724</b>	<b>2,268,680</b>	<b>2,615,338</b>	<b>2,956,469</b>

#### Operational Costs

	\$ Year 1	Year 2	Year 3	Year 4	Year 5
<b>G&amp;A Expenses - Initial &amp; General Costs</b>					
Legal Fees & Licensing for setting up	17,500	0	0	0	0
Engineering and Architect Fees	22,000	0	0	0	0
Design and Traffic Fees	5,800	0	0	0	0
Licensing renewal and other legal fees	0	13,000	13,000	13,000	13,000
Professional Services, Commercial Insurance	97,200	101,088	101,088	101,088	101,088
<b>G&amp;A Expenses - Retail</b>					
Other G&A Expenses	0	0	0	0	0
Building Renting	86,400	134,784	134,784	134,784	134,784
Building Maintenance, including utilities	7,200	11,232	11,232	11,232	11,232
Equipment Maintenance	4,800	7,488	7,488	7,488	7,488
Administrative expenses, including phone and internet	9,600	14,976	14,976	14,976	14,976
Inventory Control Systems, Security & Other Software Services	72,000	112,320	112,320	112,320	112,320
Other G&A Expenses	0	0	0	0	0
Other G&A Expenses	0	0	0	0	0
Property Taxes	0	0	0	0	0
Community Service (% of gross receipts)	8,617	20,625	26,336	30,360	34,320
<b>SG&amp;A Expenses - Marketing &amp; Sales Expenses</b>					
Marketing Expenses, including PR, Branding, Online and Offline advertising	112,200	95,472	63,648	42,432	31,824
Other Marketing & Sales Expenses	0	0	0	0	0
Other Expenses	0	0	0	0	0
SG&A Expenses - Misc.	11,941	14,940	14,156	13,640	13,441
Salaries & Benefits	328,186	393,035	403,568	403,568	403,568
<b>Total</b>	<b>783,443</b>	<b>918,959</b>	<b>902,596</b>	<b>884,888</b>	<b>878,041</b>

#### Funding Analyses

Long-term Debt	1	2	3	4	5	6
Long-Term Debt Beginning Balance	750,000	750,000	750,000	750,000	750,000	734,375
Long-Term Debt Repayment	0	0	0	0	15,625	15,625
Long-Term Debt Ending Balance	750,000	750,000	750,000	750,000	734,375	718,750
ROI	7,500	7,575	7,651	7,727	7,648	7,569

Profit Share (Investors)	0	0	0	0	0	0
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<b>Long-term Debt</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>12</b>
Long-Term Debt Beginning Balance	718,750	703,125	687,500	671,875	656,250	640,625
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	703,125	687,500	671,875	656,250	640,625	625,000
ROI	7,488	7,407	7,324	7,241	7,158	7,073
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>13</b>	<b>14</b>	<b>15</b>	<b>16</b>	<b>17</b>	<b>18</b>
Long-Term Debt Beginning Balance	625,000	609,375	593,750	578,125	562,500	546,875
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	609,375	593,750	578,125	562,500	546,875	531,250
ROI	6,987	6,901	6,814	6,726	6,637	6,547
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>19</b>	<b>20</b>	<b>21</b>	<b>22</b>	<b>23</b>	<b>24</b>
Long-Term Debt Beginning Balance	531,250	515,625	500,000	484,375	468,750	453,125
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	515,625	500,000	484,375	468,750	453,125	437,500
ROI	6,456	6,364	6,272	6,178	6,084	5,988
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>25</b>	<b>26</b>	<b>27</b>	<b>28</b>	<b>29</b>	<b>30</b>
Long-Term Debt Beginning Balance	437,500	421,875	406,250	390,625	375,000	359,375
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	421,875	406,250	390,625	375,000	359,375	343,750
ROI	5,892	5,795	5,696	5,597	5,497	5,395
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>31</b>	<b>32</b>	<b>33</b>	<b>34</b>	<b>35</b>	<b>36</b>
Long-Term Debt Beginning Balance	343,750	328,125	312,500	296,875	281,250	265,625
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	328,125	312,500	296,875	281,250	265,625	250,000
ROI	5,293	5,190	5,085	4,980	4,874	4,766
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>37</b>	<b>38</b>	<b>39</b>	<b>40</b>	<b>41</b>	<b>42</b>
Long-Term Debt Beginning Balance	250,000	234,375	218,750	203,125	187,500	171,875
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	234,375	218,750	203,125	187,500	171,875	156,250
ROI	4,657	4,548	4,437	4,325	4,212	4,098
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>43</b>	<b>44</b>	<b>45</b>	<b>46</b>	<b>47</b>	<b>48</b>
Long-Term Debt Beginning Balance	156,250	140,625	125,000	109,375	93,750	78,125
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	15,625	15,625
Long-Term Debt Ending Balance	140,625	125,000	109,375	93,750	78,125	62,500
ROI	3,983	3,866	3,749	3,630	3,510	3,389
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>49</b>	<b>50</b>	<b>51</b>	<b>52</b>	<b>53</b>	<b>54</b>
Long-Term Debt Beginning Balance	62,500	46,875	31,250	15,625	0	0
Long-Term Debt Repayment	15,625	15,625	15,625	15,625	0	0
Long-Term Debt Ending Balance	46,875	31,250	15,625	0	0	0
ROI	3,267	3,143	3,018	2,892	0	0
Profit Share (Investors)	0	0	0	0	0	0

<b>Long-term Debt</b>	<b>55</b>	<b>56</b>	<b>57</b>	<b>58</b>	<b>59</b>	<b>60</b>
Long-Term Debt Beginning Balance	0	0	0	0	0	0
Long-Term Debt Repayment	0	0	0	0	0	0

# Exhibit A

## The Holistic Concepts Security Plan

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### Introduction:

The Holistic Concepts, Inc (The Holistic Concepts) will meet all security requirements in accordance with Massachusetts state law and the Cannabis Control Commission regulations, as well as any local security requirements mandated by The City of Brockton. This security plan should be shared appropriately with local law enforcement authorities and fire services, as should any material change or revision of this plan.

### Security Audits:

In accordance with Local and State requirements, The Holistic Concepts will conduct an annual security system audit by a vendor approved by the Commission. A report of such audit will be submitted in a form and manner determined by the commission, no later than 30 calendar days after the audit is conducted. If the audit identifies concerns related to the facility's security system, The Holistic Concepts will also submit a plan to mitigate those concerns within ten business days of submitting the audit.

### **Marijuana Storage**

The Holistic Concepts will store all marijuana products at its dispensary site in a secured storage area/vault room that is climate-controlled and monitored 24-hours a day for both security and changes in environment (temperature and humidity). The Holistic Concepts will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area/vault room will be restricted and monitored through the use of electronic locks. Only select dispensary agents who have been authorized by management will have access to the secure storage area. Access will be monitored through electronic identification credentials.

The Holistic Concepts will keep all safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel.

### **Security and Manager Roles:**

The Retail Store Manager and Assistant Manager will be trained as the primary Retail Store Security Manager for our facility. In the absence of the Retail Store Security Manager their Security Management responsibilities will be assumed by the store manager or Deputy - generally, the Assistant Retail Store Manager. In any event, the assigned Security Manager must be trained and tested on the needs, requirements, and responsibilities of this essential role. The key responsibilities of the Security Manager role are:

- Safety of customers, staff, and visitors to the facility.
  - Training of staff in all security-related procedures
  - Prevention of diversion
  - Safe and secure storage of inventory
  - Integrity of perimeter and facility security
- Ensuring that all security systems and technologies function correctly, meet legal and code requirements, and are regularly maintained to prevent failure and ensure compliance
- Enforcement of all security-related matters.

### **Full Security Plan:**

The Holistic Concepts has contracted with a qualified security contractor to develop a full security plan that provides detail on how The Holistic Concepts will ensure that its products and assets are secured against external threats. For security reasons, the comprehensive security plan is not publicly available. Key elements of this plan are summarized below.

### **Qualifying Authorized Persons**

#### **Retail Facility**

- All employees of the facility will visibly display an employee identification badge issued by The Holistic Concepts at all times while at the retail facility.
- All outside vendors, contractors and visitors shall be provided with a visitor. identification badge prior to entering a limited access area, and shall be escorted at all times by a company licensed marijuana agent. The visitor identification badge will be worn visible 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.

- In accordance with state regulations all employees will be issued with an electronic “swipe” card that affords them access to certain rooms and spaces within the facility.
- No swipe card or keys will be issued to any person that is not a state licensed marijuana agent.
- In accordance with State regulations all limited access areas will be identified by the posting of a sign at least 12” by 12” stating: “Do Not Enter - Limited Access Area - Access Limited to Authorized Personnel Only” in lettering no smaller than one inch in height.
- Limited access areas shall be clearly described by the filing of a diagram of the registered premises, in the form and manner determined by the Commission.

### **Sales Floor**

- NO person may enter our retail premises without first producing a valid, state or federal, photo ID.
- No person under 21 years of age may enter the premises. There are NO exceptions to this rule.
- While a person of legal age is welcome to accompany a customer into the store, loitering, in accordance with state regulations is not permitted under any circumstances.

### **Access Levels**

The Holistic Concepts will provide all dispensary agents with varying levels of access to limited access areas, depending on their position. For example, the Chief Executive Officer and the Chief Operating Officer will have access to all areas of the dispensary, including all limited access areas. Other dispensary agents will be limited to only those areas directly related to their department and position within their department. The Dispensary shall not be construed to prohibit access to authorized law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.

### **Key/Card Procedures and Access Rights**

Entry to restricted areas with a “swipe” card can only be made by authorized personnel. It is NOT permissible to provide access to another employee to any area using your personal card.

### **Access levels**

- Managers - Store managers will have access to ALL areas and issue of all codes and combinations.  
Assistant managers and managers, as key holders, may be provided with keys for building entry depending upon their role, responsibilities, and the requirements placed upon them.
- Employees - Will be provided with a “swipe” card that provides them access to the rooms and spaces necessary for the fulfillment of their role and responsibilities.
- Visitors - Must wear a “Visitor” badge at all times when in the facility. A “Visitor” badge will be issued once the individual’s details have been entered in the log book provided. All visitors are to be accompanied by a licensed marijuana employee at ALL times.
- Contractors - Must wear a “Visitor” badge at all times when in the facility. A “Visitor” badge will be issued once the individual’s details have been entered in the log book provided. All contractors are to be accompanied by a licensed marijuana employee at ALL times.

### **Lost/Stolen card/key procedures**

Each card will have an individual serial number that is assigned to the authorized employee. In the event that a “swipe” card is lost or stolen the following steps must be taken:

- The store manager must be notified in person IMMEDIATELY when the loss is identified.
- The store manager (or duty manager) must immediately access the system and cancel the “swipe” card in question.
- The employee or visitor must complete a “Security Device Loss” form that documents when,

where, and how they believe the card was lost. In the event that the employee or visitor believes the card was stolen, a police report MUST be filed with local law enforcement and the Commission informed.

### **Locks, Cabinets, and Safe protocols**

Internal security practices require that certain drawers, cabinets, cash boxes, safes and vaults are secured with either a key lock, code lock, or combination lock. In the course of normal business it may be necessary for employees to access these secure areas. The following outlines the protocols, procedures and practices associated with the security devices.

- **Keys** - Secure storage keys are issued to responsible managers. These keys may not be handed to any unauthorized person or employee.
- **Codes** - Certain secure devices and areas are equipped with a keypad or code to deny access to unauthorized persons.
- **Combinations** - Certain secure devices and areas are equipped with a combination lock to deny access to unauthorized persons.
  - Combinations may not be written down, noted, recorded, texted, or e-mailed to any individual at any time.

### **Security Card Access System Inspection**

The Holistic Concepts will keep all locks and security equipment in good working order via regular inspections and testing, the occurrence of such inspections and tests is not to exceed thirty (30) calendar days from the previous inspection and test.

The Holistic Concepts will use electronic locks with associated card readers to manage exit and entry into limited access areas. The Holistic Concepts will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel.

All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

### **Physical Security Personnel**

The Holistic Concepts will employ security personnel who will routinely patrol the facility perimeters and grounds to prevent loitering, nuisance activity, or crime. Security personnel will be trained in security industry and crime prevention standards prior to deployment. Security personnel will ensure that only eligible customers who comply with the dispensary's Code of Conduct and other business policies are served and will patrol the area to prevent diversion and use of marijuana in public areas.

### **Accessibility**

The Holistic Concepts will protect the confidentiality of company's security measures, such as combination numbers, passwords, and electronic lock activators, against threats from unauthorized personnel.

The Holistic Concepts will install sufficient lighting outside of the business for everyday use between sunset and sunrise that adequately illuminates the dispensary and its surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles, and license plates within forty (40') feet of the business. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent against loitering, robbery, diversion, and burglary.

### **Emergency Policies and Procedures**

The Holistic Concepts will implement security policies and procedures that provide detailed instructions for



securing all product following any instance of diversion, theft, or loss of marijuana, and for conducting an assessment to determine whether additional safeguards are necessary. These instructions mandate close coordination with local law enforcement and the CCC.

### **State Compliance and Requirements**

The Holistic Concepts will engage a security company to ensure compliance with all security requirements, codes, regulations, etc. and to develop sufficient additional safeguards for any special security concerns for the prompted location.

### **Local Compliance and Requirements**

The Holistic Concepts will comply with all local and state site requirements. The Holistic Concepts is cognizant of the local requirements which are the following:

The Holistic Concepts is outside a radius of five hundred (500) feet of a school, daycare center, or any facility in which children commonly congregate. The five hundred (500) foot distance under this section is measured in a straight line from the nearest point of the facility in question to the nearest point of the proposed dispensary. In accordance, with Item Q Emergency Response Plan of Addendum 4 of the Site Plan Review Application, The Holistic Concepts will coordinate with the City of Brockton Fire and Police Departments for occupancy. A resultant written Response Plan will be filed with the Brockton Fire and Police Departments, in accordance with state regulations. Additionally, The Holistic Concepts will designate a single off-site staff member, the community liaison, with direction on how to interact one on one with the following:

- Site security and City Police
- Limited Access Areas
- Fire Safety

### **Signage/Logo**

The Holistic Concepts will make sure all signage and Logo's are state and local compliant.

### **Diagram of Premises**

Upon request, The Holistic Concepts will provide the City of Brockton with a diagram of the dispensary, reflecting walls, partitions, counters, and all areas of entry and exit. Said diagram shall also show all storage, disposal, and retail sales areas.

### **Security and Alarm System**

The Holistic Concepts will have an adequate security system to prevent and detect diversion, theft, or loss of marijuana or unauthorized intrusion, utilizing commercial grade equipment, which shall, at a minimum include:

#### **Perimeter Alarm**

The Holistic Concepts will feature an alarm system on all entry points and perimeter windows. Additional motion alarm will be placed on the dispensary wall adjacent to all entry points and perimeter windows.

#### **Failure Notifications**

The Holistic Concepts electronic security monitoring system will include a failure notification system that provides both an audio and visual notification should a failure occur in the electronic monitoring system. Additionally, senior management will receive email/text notification of the system failure within five (5) minutes of any such failure.

#### **Duress Alarm**

The Holistic Concepts will install a "duress alarm" (silent alarm to signal alarm user being forced to turn off system), a "holdup alarm" (robbery in progress), and a "panic alarm" (life threatening or emergency situation). Alarms will be coordinated with the City of Brockton Police Department.

#### **Video Cameras**

The Holistic Concepts will be well illuminated and video cameras will be placed at all entry and exit points as well as the parking lot so as to allow for the capture of clear and certain identification of any person entering or exiting the dispensary or area. Additionally, video cameras will be directed at all safes, vaults, sales areas, and areas where marijuana is stored, handled, or dispensed.

#### **Video Recording**

The Holistic Concepts DVR recording retention will be operational twenty-four (24) hours a day, seven (7) days a week. Video recordings will be retained for a minimum of ninety (90) days or longer, if requested by local or state authority. The Holistic Concepts will not destroy or alter recordings and will retain recording as long as necessary if The Holistic Concepts is aware of a pending criminal, civil, administrative investigation, or a legal proceeding for which the recording may contain relevant information. The Holistic Concepts will also provide a copy of such recording to the Brockton Police Department and or any other authority requesting.

#### **Video Stills**

The Holistic Concepts will maintain a high-quality printer in the security viewing area that is capable of immediately producing a clear, color, still photo (live or recorded) from any video camera image.

#### **Date & Time Stamp**

The Holistic Concepts will program an OSD (On Screen Display) which is a date and time stamp on all recordings. The date and time will be synchronized and set correctly and will be placed so as not to significantly obscure the picture.

#### **Power Outage**

The Holistic Concepts alarm system will be equipped with an independent, Uninterrupted Power Supply (UPS) that will automatically provide continual power in the event of a power failure or interference with the regular power supply. The security cameras will be supported by a back-up power generator that will, sustain the operation in the event of a power failure or interference with the regular power supply. The generator models selected will have a "low hum" when activated, and will not disturb abutters with noise during a power outage. A Tesla Power Wall battery may also be utilized as a back-up option, which will supply power for several days in the event of an outage or generator failure.

#### **Security Equipment**

The Holistic Concepts will maintain all security system equipment and recordings in a secure location so as to prevent theft, loss, destruction, and alterations. The secure area will be a limited access area featuring electronic locks that only allow restricted access to select authorized dispensary agents, such as the Head of Security and Chief Executive Officer, as well as law enforcement authorities and the CCC.

#### **Backup Alarm**

The Holistic Concepts will have a back-up alarm system, with all capabilities of the primary system, which shall not be installed/monitored by the same company as the primary security system. This will act as a redundancy protection for the physical burglary alarm

#### **Viewing Area**

The security viewing area will be a limited access area featuring electronic locks that only allow restricted access to select authorized dispensary agents, such as the Head of Security and Chief Executive Officer, as

well as law enforcement authorities and the CCC. A current list of authorized employees and service personnel that have access to the surveillance room will be available to the CCC and the City of Brockton upon request. The security viewing area will remain locked and will not be used for any other function.

### **Equipment Inspection and Testing**

The Holistic Concepts will ensure that all security equipment is in good working order via regular inspection.

### **Delivery Dates and Times**

The Holistic Concepts policies regarding delivery schedules are as follows:

- Times for delivery is not set on a weekly timed schedule. For security reasons, the days of the week are randomized to reduce the possibility of robbery.
- Delivery times will be scheduled according to dispensary needs.
- Delivery times, dates, and locations will not be displayed on any calendar, log, schedule or similar document (paper or electronic) viewable by anyone other than the authorized dispensary agents required to take-in deliveries.
- Delivery routes will be randomized by wholesales for security purposes. Prior to making the first delivery, dispensary couriers will map out and perform a "test-run" from the dispensary to find the best delivery route that accounts for factors including, but not limited to, traffic, population density, high-crime areas, and distance.

### **Incident Reporting**

In accordance with state regulations senior management will notify appropriate law enforcement authorities and the Commission of any breach of security immediately upon discovery of the breach. Such incidents include, but are not limited to:

- Discovery of discrepancies during inventory
- Diversion, theft or loss of any marijuana product
- Any criminal action involving or occurring on or in the retail store premises
- Any suspicious act involving the sale, cultivation, distribution, processing or production of marijuana by any person
- Unauthorized destruction of marijuana
- Any loss or unauthorized alteration of records related to marijuana
- An alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the company
- The failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours
- Any other security breach

Senior management will, within ten calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110 (7) by submitting an incident report in the form and manner determined 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 state regulations will be retained by the company 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 upon request.

### **Incident Documentation**

The Holistic Concepts will maintain all documentation related to a reported incident for no less than one (1) year and will make this information available to the CCC and law enforcement authorities upon request.

## **Audit Compliance**

The Holistic Concepts will undertake an annual security system audit using a CCC approved vendor. The findings of this audit will be submitted to the CCC no later than thirty (30) calendar days after the audit is conducted. The Holistic Concepts will also submit all necessary plans detailing how any findings will be mitigated within ten (10) business days of submitting the audit.

## **Emergency Response Procedures**

### **Investigative Response to Alarms**

The Holistic Concepts will have security agents on site during business hours. If intruder detection system, video surveillance, or other means indicate the presence of a potential intruder, security agents will immediately contact Brockton Police Department by dialing 911 or activating one of the panic/duress alarms located throughout the dispensary and connected to local law enforcement authorities. The maximum acceptable response time for any alarm will be five (5) minutes for The Holistic Concepts security agents. Security agents should, at a minimum, provide the following to the 911 operator:

- Number of suspected intruders;
  - Physical description of the suspected intruders;
  - Location within the facility of the suspected intruders;
  - Alert all occupants within the Facility to find a safe location;
  - If deemed life threatening, do not engage or confront the intruder - await response from law enforcement;
  - If safe to do so, evacuate the surrounding area immediately;
  - Close and secure all doors;
  - If unable to safely exit the building, seek shelter in a room where doors can be locked or barricaded securely;
  - Turn off lights in room;
  - Remain out of sight of doors and windows;
  - Remain quiet and turn off the volume on cell phones;
  - Once safely in a secure room, security agents or any other individual will contact Brockton Police by dialing 911 and give the location and number of people in the room;
  - Follow all instructions provided by the 911 operator;
  - If unable to speak, leave phone line open to allow the 911 operator to hear what is occurring in the room;
  - If responding law enforcement officials are encountered, keep hands elevated and palms visible;
  - If the fire alarm sounds, remain in place unless fire or smoke is detected or advised to do so by the 911 operator;
  - Do not carry items in hands that could be mistaken as a weapon;
  - When possible, security agents will assist those with disabilities and those with any injuries by escorting them to the nearest safe exit or safe area;
  - If able to safely exit the dispensary, do not return until it is declared safe to do so by law enforcement and fire officials; and
  - Follow all instructions issued by law enforcement and fire officials.
- Criminal Trespass / Indication of Security Compromise (Non-Hostile)**
- In the event an agent detects that criminal trespass has occurred, the agent should report this information to the Security Office immediately.
  - Security agents will remain at the location of suspected compromise when possible.
  - Immediately notify the Individual Responsible for Security for a determination of actions to be taken.
  - Two (2) or more agents will secure the compromised area, and conduct an inventory of the contents and check for tampering or missing inventory.

- If necessary, the individual responsible for security will request assistance as required from City of Brockton Police Department as well as notify the CCC, if required.
- If immediate evacuation is necessary due to an emergency situation, storage containers and controlled areas will be examined upon return to determine whether marijuana, marijuana products or cash were left unattended or if any marijuana, marijuana products or cash are missing following an inventory check. The individual responsible for Security will prepare an incident report that will be submitted to the Chief Operating Officer.
- Any emergency or event that would inhibit or prevent the proper safeguarding of inventory will be reported immediately to the individual responsible for Security.

### **Fire/Evacuation**

In the event of a fire or other emergency in which The Holistic Concepts facility must be evacuated, security agents will be responsible for coordinating and directing an orderly evacuation of each assigned section of the facility. Drills for evacuation and lock down should be coordinated with the City of Brockton Police and Fire Departments - evacuation priorities are:

- Move occupants who are closest to the danger to a safe area near or at an emergency exit;
- Direct all occupants to evacuate the building through the nearest safe emergency exit
- After safely exiting the building, all patients, visitors and agents should proceed directly to the predetermined assembly area to participate in "roll call" led security agents;
- In the event The Holistic Concepts receives a bomb threat, the recipient agent should notify his / her manager immediately, and dial 911; and
- In the event of a bomb threat and/or explosion, all occupants should be evacuated as described above.

## **Exhibit B**

# **Inventory Control**

In accordance with 935 CMR 500.110 (1) all marijuana products at our retail store must be securely stored to prevent unauthorized access, loss, theft, and diversion. Inventory control protocols are designed to accurately account for all products that enter and leave the facility. All marijuana products arrive pre-packaged from our suppliers facility, where it has been weighed, packaged, labelled and bar-coded. Marijuana products are transported from the cultivation/manufacturing facility by state-licensed, secure transportation and are enclosed in a sealed container together with a shipment manifest.

- The store manager, in their role as security manager is responsible for opening the container, and matching the manifest to products contained within.
- In accordance with 935 CMR 500.105 (13) (a) the store manager must weigh each product item and ensure that it matches the manifest and is correctly labelled and bar-coded. The label must indicate

the originating marijuana establishment name, address and registration name. The store manager must, in accordance with 935 CMR 500.105 (13) (c) note and record the name and registration number of the agent who prepared the manifest.

- The store manager must carry out this process in the presence of at least one other licensed marijuana agent.
- All products must be scanned and immediately entered into the retail store inventory.
- Any discrepancies must be immediately reported to Senior Management and documented.
- The container may only be opened in a designated secure area.
- The entire delivery arrival and unpacking process must be recorded on surveillance or video cameras to ensure the integrity of the chain of custody.
- The store manager signs the manifest and enters the new inventory into the “seed-to-sale” tracking software.
- The store manager stores all new inventory in its appropriate place in the vault and places the original manifest in the safe.
- Inventory is to be generally stored in the locked vault. Sufficient sales stock for each days business will be removed from the vault and stored on the shop floor. Should additional stock be required during the course of the day, the store manager will remove the required stock from the vault and add it to the sales stock on the stock floor.
- The vault door must be kept locked at all times and may only be opened to perform necessary tasks before being locked once more.
- At the end of each day, the store manager conducts an inventory of the sales stock and returns this to the vault for secure storage.
- Each day, the store manager must complete the inventory reconciliation report that documents what was sold during the day, and the store manager adds the manual count to the report. In the event any of the inventory has damaged packaging or is past its usable date, the dispensary manager moves this particular inventory to a storage container marked “Unusable Inventory”. The dispensary manager then updates the software to show what specific packages of marijuana products have been moved from the active database to the “dead” inventory file.
- When finished, the store manager must save the reconciliation report using the “seed-to-sale” tracking software. Variances between expected inventory and actual inventory must be immediately reported to Senior Management and documented.
- These reports are checked each day by our internal auditor. Unreported discrepancies will be flagged, documented and immediately reported to Senior Management.
- Each and every discrepancy will be personally investigated by Senior Management, or their deputy, within 24 hours.

- If there is no obvious explanation for the discrepancy, Senior Management will review the retail store's surveillance tapes for the week prior to the issue, and also review all sales and inventory reports produced by the Point of Sale system for the same time period.
- Senior Management will act on the inventory issue after documenting where the inventory went missing, and will interview the appropriate personnel to determine whether his or her conclusions are correct.
- In the event the inventory was taken by a store employee, they will be terminated and the police will be notified for possible prosecution.
- In the event the inventory was inaccurately counted, Senior Management will create a report stating such, and provide it to the board of directors. Senior Management will also review his or her findings with the store manager in order to flag any compliance issues and if necessary create new procedures to avoid the issue again.



1915 Main St  
Brockton MA



**ARCHITECTS' STUDIO 1**  
Jerome R Dixon, Architect

ARCHITECTURE  
PLANNING  
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## Proposed Floor Plans




DATE : 08-28-2019  
DRAWN BY : LP  
CHECKED BY : JRD  
ARCHITECT'S PROJECT NO: J19059



# A10

TOTAL NET BASEMENT-	1754SF
TOTAL NET 1ST FLOOR-	1789SF
TOTAL NET -	3543SF
TOTAL GROSS BASEMENT -	1994SF
TOTAL GROSS 1ST FLOOR -	1994SF
TOTAL GROSS -	3988SF

TYPES OF WALL

	EXISTING WALL
	REPLACE WALL
	SECURITY WALL



# EXHIBIT D



Front View from Main st. RT. 28



Google Street View Rear View from Main St. Rt. 28



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Adult-Use Dispensary

1915 Main St  
Brockton MA



ARCHITECTS' STUDIO  
Jerome R. Dixon, Architect

ARCHITECTURE  
PLANNING  
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3D RENDERS

DATE: 08-28-2019  
DRAWN BY: LP  
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# EXHIBIT E



## **Qualifications and Training**

Holistic Concepts will ensure that all employees hired to work at a Holistic Concepts facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles.

### **Qualifications**

In accordance with 935 CMR 500.030, a candidate for employment as a marijuana establishment agent must be 21 years of age or older. In addition, the candidate cannot have been convicted of a criminal offense in the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States, or foreign jurisdiction, or a military, territorial, or Native American tribal authority.

- Holistic Concepts will also ensure that its employees are suitable for registration consistent with the provisions of 935 CMR 500.802. In the event that Holistic Concepts discovers any of its agents are not suitable for registration as a marijuana establishment agent, the agent's employment will be terminated, and Holistic Concepts will notify the Commission within one (1) business day that the agent is no longer employed with the establishment.

### **Training**

- As required by 935 CMR 500.105(2), and prior to performing job functions, each of Holistic Concepts' agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent's job function. Agent training will at least include the Responsible Vendor Program and eight (8) hours of on-going training annually.
- All of Holistic Concepts' current owners, managers, and employees will attend and successfully complete a Responsible Vendor 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.
- Holistic Concepts' new, non-administrative employees will complete the Responsible Vendor Program within 90 days of the date they are hired.
- Holistic Concepts' owners, managers, and employees will then successfully complete the program once every year thereafter.
- Holistic Concepts' records of responsible vendor training program compliance will be maintained for at least four (5) years and made available during normal business hours for inspection by the Commission and any other state licensing authority upon request.
- As part of the Responsible Vendor program, Holistic Concepts' agents will receive training on a variety of topics relevant to marijuana establishment operations, including but not limited to the following:

Marijuana's effect on the human body, including physical effects based on different types of marijuana products and methods of administration, and recognizing the visible signs of impairment;

Best practices for diversion prevention and prevention of sales to minors; Compliance with tracking requirements;

Training on acceptable forms of identification, including verification of valid photo identification and confiscation of fraudulent identifications;

Such other areas of training determined by the Commission to be included;

Other significant state laws and rules affecting operators, such as:

- Local and state licensing and enforcement;
- Incident and notification requirements;
- Administrative and criminal liability and license sanctions and court sanctions;
- Waste disposal and health and safety standards;
- Patrons prohibited from bringing marijuana onto licensed premises;
- Permitted hours of sale and conduct of establishment;
- Permitting inspections by state and local licensing and enforcement authorities;
- Licensee responsibilities for activities occurring within licensed premises;
- Maintenance of records and privacy issues;
- Prohibited purchases and practices.

## **Record Keeping Procedures**

Holistic Concepts' records are available for inspection by the CCC upon request. Holistic Concepts' internal records are maintained in accordance with Generally Accepted Accounting Principles. Written records that are maintained and available for inspection by the Commission include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the following:

- Complete set of written operating procedures as required by 935 CMR 500.105(1);
- Complete inventory records as required by 935 CMR 500.105(8);
- Seed-to-sale tracking(BioTrack) records for all marijuana products as required by 935 CMR 500.105(8)(e); Using CCC approved tracking software or CRM

The following personnel records:

- Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
- A personnel record for each marijuana establishment agent. Holistic Concepts records will be maintained for at least 24 months after termination of the individual's affiliation with Holistic Concepts and will include, at a minimum, the following:
  - all materials submitted to the Commission pursuant to 935 CMR 500.030(2);
  - documentation of verification of references;
  - the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision
  - 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.
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030.

Business records: Holistic Concepts maintains its financial records within QuickBooks, including all retail and wholesale revenue, all expenses, wages, capital expenditures, liabilities, and all other items that would appear on Holistic Concepts's profit and loss or balance sheet. These records cover:

- Assets and liabilities;
- Monetary transactions;
- Books of accounts, including journals, ledgers, and supporting documents,
- Sales records including the quantity, form, and cost of marijuana products; and
- Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including

members of the nonprofit corporation, if any.

Waste disposal records as required under 935 CMR 500.105(12); and

- In the event of closure, Holistic Concepts will maintain all waste records for at least two years in a form and location acceptable to the Commission.

# Personnel Policies

The Holistic Concepts, INC (“Holistic Concepts”) will maintain personnel records as a separate category of records due to the sensitivity and importance of information concerning agents, including registration status and background check records. Holistic Concepts will keep, at a minimum, the following information in agent personnel records:

- All materials submitted to the Commission pursuant to 935 CMR 50.030(2);
- Job descriptions or employment contracts that includes descriptions of the agent’s duties, authority, responsibilities, qualifications, and supervision;
- Required training, including training regarding privacy and confidentiality requirements, and the signed statement of the person indicating the date, time and place the agent received said training;
- Documentation of verification of references;
- Records of any disciplinary action taken;
- All background check reports, including CORI, obtained in accordance with 935 CMR 500.030(1);
- Documentation of periodic performance evaluations;
- Notice of completed responsible vendor and eight-hour related duty training;
- Documentation of all security related events (including violations) and the results of any investigations and description of remedial actions, restrictions, or additional training required as a result of an incident.

Holistic Concepts personnel records will be kept in a secure location to maintain confidentiality. Personnel records will only be accessible to the agent’s manager, members of Holistic Concepts executive management team and Human Resources. Holistic Concepts will ensure the maintenance of confidential information pursuant to 935 CMR 500.105(1)(k) and will enforce the dismissal of staff for prohibited policy offenses in accordance with 935 CMR 105(1)(l).

Holistic Concepts Policy requires IMMEDIATE DISMISSAL of any staff member who:

1. Diverted marijuana, which shall be reported to law enforcement officials and to the Commission;
2. Engaged in unsafe practices with regard to operation of Holistic Concepts, which shall be reported to the Commission; or
3. Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

Holistic Concepts policy requires that it obtain certification as a Responsible Vendor. All Holistic Concepts staff will be required to complete a Responsible Vendor Training within ninety (90) days of hire in accordance with 935 CMR 500.105(2)(b). At a minimum, Holistic Concepts staff shall receive eight hours of on-going training annually.

Holistic Concepts policy will ensure that all employees are aware of the alcohol, smoke, and drug-free workplace policy in accordance with 935 CMR 500.105(1)(j). Signed acknowledgement of receipt of said policy will be kept in the personnel file.

## Job Descriptions

### Director of Security:

Under the supervision of the Chief Executive Officer, the Director of Security is responsible for the development and overall management of the Security Policies and Procedures for Holistic Concepts, while implementing, administering, and revising the policies as needed. In addition, the Director of Security will perform the following duties:

- Provide general training to Holistic Concepts agents during new hire orientation or re-current trainings throughout the year;
- Provide training specific for Security Agents prior to the Security Agent commencing job



- functions;
- Review and approve incident reports and other reports written by Security Agents prior to submitting to the executive management team- follow up with security agent if needed;
- Maintain lists of agents authorized to access designated areas of the Holistic Concepts facility, including cash and product storage vaults, the surveillance and network equipment room, and other highly sensitive areas of the Holistic Concepts facility;

The **Chief Executive Officer, Chief Operating Officer**, and any other designated advisors to ensure the current policies and procedures are properly implemented, integrated, effective, and relevant to ensure the safety of Holistic Concepts agents and assets;

- Ensure that all required background checks have been completed and documented prior to an agent performing job functions; ensure agent is granted appropriate level of access to the facility necessary to complete his/her job functions;
- Maintain all security-related records, incident reports and other reports written by security agents;
- Evaluate and determine the number of security agents assigned to each shift and proper shift change times; and
- Maintain frequent contact with local law enforcement authorities.

#### **Security Agents perform the following duties and other duties upon request:**

- Investigate, communicate, and provide leadership in the event of an emergency such as an intrusion, fire, other threats that jeopardizes customers, authorized visitors, and Holistic Concepts agents;
- Respond and investigate security situations and alarm calls; clearly document the incident and details surrounding the incident in a written report for the Director of Security;
- Oversee the entrance to the facility and verify credentials of each person seeking access to the Holistic Concepts facility;
- Escort Holistic Concepts agents from the facility during non-business hours and perform security checks at designated intervals.

#### **Inventory Manager:**

The Inventory Manager is responsible for inventory on a day-to-day basis as well as the weekly and monthly inventory counts and waste disposal requirements.

The inventory manager will perform the comprehensive annual inventory in conjunction with the executive management team. Additional duties include, but are not limited to:

- Implementing inventory controls to track and account for all dispensary inventory;
- Implementing procedures and notification policies for proper disposal;
- Maintaining records, including operating procedures, inventory records, audit records, storage and transfer records;
- Maintaining documents with each day's beginning, acquisitions, sales, disposal, and ending inventory; and
- Proper storing, labeling, tracking, and reporting of inventory.

#### **Inventory Associate:**

Inventory Associates support the Inventory Manager during day-to-day operations. Responsibilities include, but are not limited to:

- Maintaining records, including operating procedures, inventory records, audit records, storage and transfer records;
- Maintaining documents with each day's beginning, acquisitions, sales, disposal and ending inventory;
- Ensuring products are properly stored, labeled, and recorded in the BioTrack THC system;

- Ensuring waste is properly stored; and
- Coordinating the waste disposal schedule and ensuring Holistic Concepts' policies and procedures for waste disposal are adhered to.

### **Human Resources Manager:**

The Human Resources Manager at Holistic Concepts will support the Executive management team on a day-to-day basis to effectively implement all personnel policies and procedures for Holistic Concepts, including hiring processes. The Human Resources Manager will:

- Oversee hiring and release of Holistic Concepts agents;
- Review and revise Holistic Concepts personnel policies and procedures in consultation with the executive management team and department Managers;
- Develop training schedules and policies for Holistic Concepts agents under the supervision of the executive management team and department managers;
- Handle any and all agent discipline as necessary;
- Ensure compliance with any and all workplace policy laws and requirements; and
- Be responsible for such additional human resources tasks as determined by the executive management team.

### **Retail Manager:**

Responsible for overseeing all Member Services Agents and managing day-to-day operations of the retail facility. This includes, but is not limited to:

- Implementing inventory tracking;
- Training retail staff;
- Ensuring customer satisfaction through feedback tools;
- Reporting all incidents and complaints to the executive team; and
- Working with bookkeeping to ensure precise data flow.

### **Member Services Agent:**

Member Services Agents ensure that each customer is treated with respect while at a Holistic Concepts facility and that each customer receives the appropriate amount of individualized attention in order to address his/her specific needs and questions. Member Services Agent responsibilities include, but are not limited to:

- Maintaining a clean, safe, healthy, and productive environment ensuring that customers have a positive experience at a Holistic Concepts facility;
- Answering customer questions regarding products including but not limited to flowers, concentrates, tinctures, and edibles;
- Being knowledgeable of strains and various types of products offered by Holistic Concepts;
- Properly setting up product displays pursuant to Holistic Concepts policies and procedures;
- Executing and enforcing compliance with Commission regulations and Holistic Concepts policies and procedures;
- Understanding sales transactions using BioTrack THC;
- Understanding individual customer goals;
- Reconciling cash from sales transactions, sales reports, and other forms of task management daily; and
- Participating in ongoing education and professional development as required.

### **Staffing Plan and Business Hours**

#### **Hiring and Recruitment**

Holistic Concepts' Human Resource Manager will engage the executive management team and management staff on a regular basis to determine if vacancies are anticipated or whether specific positions need to be created in response to company needs. Holistic Concepts' hiring practices will include but are not limited to the following and apply to all types of working situations including hiring,

firing, promotions, harassment, training, wages and benefits:

- Equal Employment Opportunity Commission (EEOC) Compliance;
- Holistic Concepts' Diversity Plan and Community Initiatives;
- Holistic Concepts' Plan to Positively Impact Areas of
- Disproportionate Impact;
- Background Checks and References;
- Mandatory reporting of criminal convictions (and termination if necessary);
- State and Federal Family Leave Act;
- Workplace Safety Laws;
- State and Federal Minimum Wage Requirements; and
- Non-Disclosure and Non-Complete Agreements.

## **Standards of Conduct**

Holistic Concepts is committed to maintaining an environment conducive to the health and wellbeing of customers and employees. It is Holistic Concepts' mission to provide a professional workplace.

Holistic Concepts will provide a work environment free from harassment and discrimination for employees. Holistic Concepts will not tolerate harassment or discrimination on the basis of sex, race, color, national origin, age, religion, disability, sexual orientation, gender identity, gender expression, or any other trait or characteristic protected by any applicable federal, state, or local law or ordinance. Harassment or discrimination on the basis of any protected trait or characteristic is contrary to Holistic Concepts' values and is a violation of the Company Code of Conduct. Harassment is a form of discrimination. There is a broad range of behavior that could constitute harassment. In general, harassment is any verbal or physical conduct that:

- Has the purpose or effect of creating an intimidating, hostile, or offensive working environment;
- Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- Adversely affects an individual's employment opportunities.

Employees are expected to maintain the highest degree of professional behavior. All harassment or discrimination by employees is strictly prohibited. Further harassing or discriminatory behavior, of non-employees directed at Holistic Concepts employees or customers also is condemned and will be promptly addressed.

The Holistic Concepts in accordance with *935 CMR 500.105(1)* will fully Enforcement of Alcohol, smoke, and drug-free workplace policies in accordance with *935 CMR 500.105(1)*; and

## **Maintaining of Financial Records**

The Holistic Concepts, Inc.'s ("HC") policy is to maintain financial records in accordance with 935 CMR 500.105(9)(e). The records will include manual or computerized records of assets and liabilities, monetary transactions; books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices and vouchers; sales records including the quantity, form, and cost of marijuana products; and salary and wages paid to each employee, stipends paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the non-profit corporation. HC shall adopt separate accounting practices for non marijuana and non marijuana sales. 935 CMR500.140(6)

HC will conduct monthly sales equipment and data software checks and initiate reporting requirements for discovery of software manipulation as required by 935 CMR 500.140(6)(d). HC will not utilize software or other methods to manipulate or alter sales data in compliance with 935 CMR 500.140(5)(c). HC will conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. HC will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If HC determines that software had been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data we will disclose the information to the Commission; cooperate with the Commission in an investigation relative to data manipulation; and take other action as directed by the Commission to comply with the applicable regulations

Following the closure of HC, all records will be kept for at least two years at the expense of HC and in a form and location acceptable to the Commission, in accordance with 935 CMR 500.105(9)(g). Financial records shall be kept for a minimum of three years from the date of the filed tax return, in accordance with 830 CMR 62C.25.1(7) and 935 CMR 500.140(6)(e).

## **Restricting Access to 21 and Over**

As per 935 CMR 500.140 (2) On-premises Verification of identification for Adult Use Only Locations, upon entry into Holistic Concepts (HS) retail premises by an individual, a HS agent shall immediately inspect the individual's proof of identification and determine the person's age. No one shall be admitted to the premises unless the retailer has verified that the person is 21 years of age or older by an individual's proof of identification.

All employees of HS' must be 21 years of age or older. 935 CMR 500.029 or 500.030

HS' retail store layout is designed to enable access to consumers with a verified and valid government-issued photo ID or in possession of a Program ID Card demonstrating the individual is a registered qualifying patient with the Medical Use of Marijuana Program .

Upon entry into the premises of HS' retail marijuana establishment by an individual, a HS security agent will immediately inspect the individual's proof of identification and determine the individual's age , in accordance with 935 CMR 500.140(2).

HS will stop all persons entering the store to determine whether that person may legally enter the premises. All persons must first be verified in the Entry Room. The Entry Room is physically separated from the Store by a closed, and locked door.

Any persons who cannot provide the required legal proof that they are aged **21 years or older** shall be **DENIED ENTRY** and politely turned away , with an explanation that the law requires all persons entering HS be **21 years or older**.

In the event HS discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified. Pursuant to 935 CMR 500.10(1)(1).

Furthermore, HS will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors, pursuant to 935 CMR 500.030(1).

Pursuant to 935 CMR 500.105(4), HS will not engage in any marketing, advertising or branding practices that are targeted to, deemed to appeal to or portray minors under the age of 21.

HS will not engage in any advertising, marketing and branding via television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising listing, including charitable, sporting or similar events, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by a reliable audience composition data report.

HS will not manufacture or sell any edible products that resemble a realistic or fictional human, animal or fruit, including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b).

HS will not sell or market any Marijuana product that is not capable of being tested by an independent testing Laboratory. 935 CMR 500.140(9).

HS Shall notify the Commission within 72 Hours of any laboratory testing results indicating contamination if contamination cannot be remediated and disposal of the production batch

necessary. 935 CMR 500.160(2)

In accordance with 935 CMR 500.105(4)(a)(5), any marketing advertising and branding Materials for public viewing will include a warning stating, "For use only by adults 21 years of Age"

age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of marijuana.'

Pursuant to 935 CMR 500.105(6)(b), HS' packaging for any cannabis or cannabis products will not use bright colors, resemble existing branded products, feature cartoons or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be attractive to minors.

HS' website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13).

HS will contract with a third-party security company for provision of trained security personnel.

HS' security personnel will require verification that the individual desiring to enter HS are aged **21 years or older.**

HS' security personnel will use the electronic card reader to verify the identification offered by the individual desiring to enter HS.

HS' security personnel will use the Blacklight to examine and verify the identification offered by the individual desiring to enter HS. The Blacklight will often illuminate evidence that the identification has been altered. In the event that an offered identification displays obvious signs of tampering HS staff shall not honor the identification. HS staff shall DENY ENTRY and politely turn that person away, with an explanation that the law requires all persons entering HS to provide acceptable proof that the individual is **21 years or older.**

Customers are only to be allowed entry into the door exiting the Entry Room once they have satisfactorily proved that they are **21 years or older.**

Further, HS Staff shall DENY ENTRY and shall REFUSE to sell cannabis products to a consumer if, in the opinion of the Staff, and based on the information available to the agent at that time, **the consumer or the public would be placed at risk.**

Clearly intoxicated or impaired persons shall be DENIED ENTRY.



## **Quality Control and Testing**

### **Quality Control**

The Holistic Concepts, INC (“Holistic Concepts”) will comply with the following sanitary requirements any Holistic Concepts agent working in direct contact with marijuana or non-edible marijuana products will conform to sanitary practices in accordance with 935 CMR 500.105 while on duty, including:

- Floors Walls and Ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair. 935 CMR 500.105(3)
- Maintaining adequate personal cleanliness; and
- Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
- Holistic Concepts’ hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand- washing facilities will be located in Holistic Concepts’ employee only areas and where good sanitary practices require employees to wash and sanitize their hands and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices.
- Plumbing Shall will be of an adequate size and design and maintained to carry sufficient quantities of water to required locations throughout the establishment as set forth in 935 CMR 500.105(3)
- Holistic Concepts’ facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
- Holistic Concepts will 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 will be maintained in an
- Holistic Concepts' facility will have adequate safety lighting in all processing and storage areas.:
- Holistic Concepts buildings fixtures and other physical facilities will be

**Maintained in a sanitary condition:**

- Holistic Concepts will ensure that all contact surfaces, and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;
- All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products;
- Holistic Concepts will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
- Holistic Concepts will ensure that Holistic Concepts' facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

## **Recalls/Spoilage**

- Holistic Concepts will 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 Holistic Concepts 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 will be disposed of in accordance with the provisions of 935 CMR 500.105(12), and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

## **Testing**

- Holistic Concepts will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.



## DIVERSITY PLAN

### Introduction

The Holistic Concepts, Inc. ("HC") proposed retail store will be located at 1915 Main St. Brockton, Massachusetts. Per the Massachusetts Cannabis Control Commission's most recent guidelines, the entire City of Brockton is designated as an area of disproportionate impact.

The Holistic Concepts will develop and maintain a robust Diversity Plan. HC is well aware that the success of its business relies on hiring and developing a workforce that is truly diverse and that reflects the community in which HC is located. Diversity plays a vital part in HC's commitment to its neighbors. HC will create a vibrant, diverse work culture that reflects its commitment to its community.

HC's primary goal of our diversity plan is to be tailored to promote equity among the Commission approved areas of diversity which include but not be limited to: opportunities for minorities, women, veterans, people with disabilities, and people who identify as LGBTQ+. HC will do everything in its power and ability to employ and advance qualified and diverse people at all levels of management and staff.

### Impact Groups

The Holistic Concepts aims to hire people who meet the criteria set forth in the Commission's requirements for diversity, namely:

- Minorities (25%);
- Women (20%);
- Veterans (10%);
- People with disabilities (5%); and
- People who identify as LGBTQ+ (5%).

### Goals

HC's Diversity Plan promotes equity among minorities, women, veterans, people with disabilities, and people who identify as LGBTQ+. To achieve this vision, HC has created measurable goals that require a sustained and concerted effort to:

- Hire employees represented in the demographics listed above; and
- Provide tools and training that facilitate the success of these employees.

HC intends to reserve no less than one-fifth (1/5) or 20 percent of its workforce, full or part time, for candidates who meet the above criteria with an overall goal to reach 70% within 2 years. HC will employ best efforts and practices to purchase products and other supplies from businesses operated and owned by minorities, women, veterans, people with disabilities, and people who identify as LGBTQ+.

HC intends to reserve no less than 20 percent of its workforce, full or part time, for candidates who meet the above criteria.

HC will also establish a market for cannabis-related suppliers, including consumer containers and packaging, point of sale systems, advertising and marketing services, security services and products, along with construction and renovation services related to HC's initial build out of its store.

## Programs

### Diversity Recruitment and Sourcing

HC will create and support an inclusive and diverse workforce by proactively recruiting employees from groups that are traditionally under-represented in the workforce, namely minorities, women, veterans, people with disabilities, and people who identify as LGBTQ+.

HC's recruitment efforts will build a pool of qualified diverse applicants by:

- Participating in two (2) career fairs in and around the City of Brockton per year;
- Relying on diverse employee or peer referral programs;
- Publicizing employment opportunities by advertising in a range of publications, including local media outlets with audiences who are minorities, bilingual, LGBTQ+, women, veterans, disabled, and/or other demographically diverse groups monthly, including El Mundo Boston, Bay Windows, The Haitian Times Boston, The Brockton Enterprise, The Patriot Ledger, Patch.com Brockton, Wicked Local Brockton, Whitman-Hanson Express, The Boston Broadside – South Shore, the Boston Globe, and the Boston Herald;
- Participating in diverse networking groups consisting of people who are minorities, LGBTQ+, women, veterans and other groups that are demographically diverse, including Work Without Limits, South Shore Women's Business Network, Metro South Chamber of Commerce, the South Shore Chamber of Commerce, and the Downtown Brockton Business Association;
- Posting open jobs on online public boards;
- Contacting recruiters and employment agencies that work with diverse candidates; and
- Leveraging social media and online platforms such as Zip Recruiter to reach a multitude of online career and job websites.

HC will work closely with Brockton's Veterans Administration representative to reach out to interested veterans seeking jobs in the cannabis industry. HC will also work with established recruiters who specialize in or are familiar with qualified candidates who are minorities, women, veterans, people with disabilities, and people who identify as LGBTQ+.

HC also needs to hire specialized talent who are familiar with the cannabis industry, for example. As mentioned earlier, HC will rely on recruiters, employment agencies, internet (websites and advertisement), and advertising in appropriate local media outlets/platforms, to the extent such methods comply with the law and are intended to target only adults, whether this is for security or specialized material or methods specific to the cannabis industry.

HC plans to train its talent on a continuous basis, in order to have a continuous cycle of staff in training to prepare for management positions. HC will also provide management training

for employees seeking advancement through education credits or benefits. This will allow HC to mitigate employee turnover that affects every business, particularly retail establishments.

#### Employee Retention, Training and Development

HC's senior management is well aware that its Diversity Plan goals and the company's ability to create a workplace culture with zero tolerance for discrimination, harassment, or retaliation is critical to The Holistic Concepts's long-term success. Simply put, the owner believes that hiring and maintaining a diverse workforce is the right thing to do.

HC will maintain a diverse and inclusive workforce by mentoring, training, and creating robust professional development programs that encourage and promote an inclusive work environment.

The Holistic Concepts diversity awareness training will emphasize its zero-tolerance commitment of harassment and discrimination along with HC's strict adherence to take corrective action should any issues, concerns, or complaints arise.

During their new employee orientation, The Holistic Concepts employees will be required to successfully complete the company's diversity awareness training program. Employees will take ongoing, additional diversity training tailored to their specific job functions for every 90 days that they are employed.

HC's new employees will also complete a general orientation program, after which they will be able to describe and discuss in detail and respect the conditions outlined in the Diversity Plan.

HC will also require that all employees and managers complete additional cultural sensitivity and diversity training on a regular basis. That way, all levels of HC management and staff can stay current on best practices and company procedures, while gaining a better understanding and compliance with HC's Diversity Plan.

The Holistic Concepts will share information to the company and vendors related to its Diversity Plan by:

- Communicating HC's zero-tolerance policies for harassment, discrimination and bullying to employees, management, vendors and customers;
- Implementing mandatory diversity training programs for all HC employees on a Quarterly basis;
- Conducting monthly managerial meetings during HC's first year to evaluate the Diversity Plan; eventually moving to quarterly meetings once the program has been successfully adopted and followed; and
- Deploying an effective internal communications strategy for employees of electronic, social and print media campaigns to support and expand diversity initiatives.

HC's Human Resources Manager and Chief Executive Officer/Chief Financial Officer will design an employee retention plan to offer promotions once employees successfully complete industry training and education programs such programs will be evaluated quarterly for compliance and effectiveness. HC will also make sure that all employees have access to equal opportunities for promotion by communicating opportunities, training programs, and clearly-defined job descriptions in frequent HC internal communications.

#### Measurements:

HC will implement a program led by the CEO/CFO and implemented by the Human Resources Manager with The Holistic Concepts department managers. 4



The Holistic Concepts will develop and implement policies, programs, statements, and internal and external communication procedures in support of the goals of its Diversity Plan. The Holistic Concepts will help identify problematic areas, such as:

- Designing reporting systems that measure effectiveness of programs that support the Diversity Plan and present these results at the Commission's request;
- Implementing a process to review and resolve discrimination complaints or other noncompliant incidents with regards to equal opportunity and fair treatment of all employees;
- Reviewing the Diversity Plan with all levels of management to ensure that the Plan is understood and followed, this review will take place quarterly;
- Working with HC management to solve any diversity and inclusion related issues; and
- Quarterly Auditing HC's internal and external job postings so that all information follows HC's diversity policies and procedures.

#### Annual Audit of the Diversity Plan's Effectiveness:

On an annual basis, HC will conduct an audit of its Diversity Plan. The team will measure its success by providing the Commission with the:

- Number of employees from the above groups who were hired and retained after the issuance of a license;
- Number of promotions for employees in the above demographics since initial licensure;
- Number of positions created since initial licensure;
- Number of and type of information sessions held or participated in with supporting documentation;
- Number of postings in diverse publications or general publications with supporting documentation;
- Number and subject matter of trainings held and the number of individuals falling into the above listed demographics in attendance; and
- Description of plan and effort made by HC to monitor and enforce the Diversity Plan.
- Number of career fairs attended.

#### Acknowledgments

The Holistic Concepts (HC) will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment.

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