



Massachusetts Cannabis Control Commission

Public Record Request

Marijuana Retailer

General Information:

License Number: MR281495
Original Issued Date: 02/04/2019
Issued Date: 01/16/2020
Expiration Date: 02/04/2021
Payment Received: \$5000 Payment Required: \$10000

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Garden Remedies, Inc. Federal Tax Identification Number EIN/TIN: [REDACTED]
Phone Number: 617-543-8181 Email Address: tschlacter@gardenremedies.com
Business Address 1: 697 Washington Street Business Address 2:
Business City: Newton Business State: MA Business Zip Code: 02458
Mailing Address 1: 697 Washington Street Mailing Address 2:
Mailing City: Newton Mailing State: MA Mailing Zip Code: 02458

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: yes
Priority Applicant Type: RMD Priority
Economic Empowerment Applicant Certification Number:
RMD Priority Certification Number: RPA201820

RMD INFORMATION

Name of RMD: Garden Remedies, Inc.
Department of Public Health RMD Registration Number: 008
Operational and Registration Status: Obtained Final Certificate of Registration and is open for business in Massachusetts
To your knowledge, is the existing RMD certificate of registration in good standing?: yes
If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: Percentage Of Control:
Role: Executive / Officer Other Role:
First Name: Karen Middle Name: Last Name: Munkacy Suffix:
Gender: Female User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: Percentage Of Control:
Role: Executive / Officer Other Role:
First Name: Jeffrey Middle Name: Last Name: Herold Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: Percentage Of Control:
Role: Executive / Officer Other Role:
First Name: Sean Middle Name: Last Name: Mack Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: RMC Holdings, LLC Entity DBA:
Email: pwesthead@rimrockcapital.com Phone: 949-381-7883
Address 1: 100 Innovation Drive Address 2: Suite 200
City: Irvine State: CA Zip Code: 92617
Types of Capital: Monetary/Equity Other Type of Capital: Total Value of Capital Provided: \$3036000 Percentage of Initial Capital: 10
Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 697 Washington Street

Establishment Address 2:

Establishment City: Newton

Establishment Zip Code: 02458

Approximate square footage of the establishment: 1200

How many abutters does this property have?: 55

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
Community Outreach Meeting Documentation	community outreach.pdf	pdf	5b0eca09f5ed5811d6e4572d	05/30/2018
Certification of Host Community Agreement	host community.pdf	pdf	5b0eca1b9bcf5a047e3521c8	05/30/2018
Plan to Remain Compliant with Local Zoning	Garden Remedies Inc. Plan to Remain Compliant with Local Zoning_.pdf	pdf	5bdca8a22d1cf504966f28bd	11/02/2018

Total amount of financial benefits accruing to the municipality as a result of the host community agreement. If the total amount is zero, please enter zero and provide documentation explaining this number.: \$180170.26

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.pdf	pdf	5b97fd6818807b2d67c415a8	09/11/2018

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Other Role:
First Name: Karen Middle Name: Last Name: Munkacy Suffix:
RMD Association: RMD Manager
Background Question: no

Individual Background Information 2

Role: Other Role:
First Name: Jeffrey Middle Name: Last Name: Herold Suffix:
RMD Association: RMD Manager
Background Question: no

Individual Background Information 3

Role: Other Role:

First Name: Sean Middle Name: Last Name: Mack Suffix:

RMD Association: RMD Manager

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	DOR Certificate of Good Standing.pdf	pdf	5b0ef5120d20bf11ae6d9850	05/30/2018
Articles of Organization	GRI Articles of Organization.pdf	pdf	5b0ef51eb416c03d7112064b	05/30/2018
Bylaws	GRI ByLaws.pdf	pdf	5b0ef52d75ce440437858e21	05/30/2018
Secretary of Commonwealth - Certificate of Good Standing	GRI Certificate of Good Standing.pdf	pdf	5b0ef5396fb0f811c2266e15	05/30/2018
Articles of Organization	Paula B. Nickerson.pdf	pdf	5bdcaa07d84f77046ceecccc	11/02/2018

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	Certificate of Good Standing DOR - 8-26-19.pdf	pdf	5dcedfc27aad8653363bcfd7	11/15/2019
Secretary of Commonwealth - Certificate of Good Standing	Certificate of Good Standing SOC 9-10-19.pdf	pdf	5dcedfcc74bb15534cd4c6c3	11/15/2019
Department of Unemployment Assistance - Certificate of Good standing	UI Certificate of Compliance.pdf	pdf	5dcedfe20f35e05798b371e6	11/15/2019

Massachusetts Business Identification Number: 001112342

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	GRI Business Plan 10.10.19.pdf	pdf	5dcee048bcb01253152f5fb7	11/15/2019
Plan for Liability Insurance	Certificates of Liability Insurance.pdf	pdf	5dcee06dd5b0805341c6211e	11/15/2019

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana	Obtaining Marijuana or Marijuana	pdf	5ddeda4ebcb01253152f83e2	11/27/2019

products	Projects.pdf			
Separating recreational from medical operations, if applicable	Separating Recreational from Medical Operations.pdf	pdf	5ddeda58160e3b57a3dd47ff	11/27/2019
Security plan	Security Plan.pdf	pdf	5ddedaa97aad8653363bf3c2	11/27/2019
Restricting Access to age 21 and older	Restricting Access to 21 and Older.pdf	pdf	5ddedab374bb15534cd4eaf3	11/27/2019
Prevention of diversion	Prevention of Diversion.pdf	pdf	5ddedac09c1081532b9a7936	11/27/2019
Storage of marijuana	Storage of Marijuana.pdf	pdf	5ddedad57aad8653363bf3c6	11/27/2019
Transportation of marijuana	Transportation of Marijuana.pdf	pdf	5ddedadc74bb15534cd4eaf7	11/27/2019
Inventory procedures	Inventory Procedures.pdf	pdf	5ddedae4b4f83557d6cc8ed5	11/27/2019
Quality control and testing	Quality Control and Testing.pdf	pdf	5ddedc220f35e05798b3959f	11/27/2019
Record Keeping procedures	Record Keeping Procedures.pdf	pdf	5ddedc32a9ef3857c445bc70	11/27/2019
Personnel policies including background checks	Personnel Procedures.pdf	pdf	5ddedc64bcb01253152f83ec	11/27/2019
Dispensing procedures	Dispensing Procedures.pdf	pdf	5ddedc6f9c1081532b9a793f	11/27/2019
Maintaining of financial records	Maintaining of Financial Records.pdf	pdf	5ddedcde0f35e05798b395a9	11/27/2019
Diversity plan	Diversity Plan 10.10.2019.pdf	pdf	5ddedd108bdcfd57ae527fe7	11/27/2019
Qualifications and training	Qualifications and Training.pdf	pdf	5ddedd1666a32657cfbdd32a	11/27/2019

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

Adequate Patient Supply Documentation:

Document Category	Document Name	Type	ID	Upload Date
	GRI Adequate Patient Supply.pdf	pdf	5de6b97d40e348579197f572	12/03/2019

Reasonable Substitutions of Marijuana Types and Strains Documentation:

Document Category	Document Name	Type	ID	Upload Date
	GRI Substitution SOP .pdf	pdf	5de6b9888bdcfd57ae528890	12/03/2019

ATTESTATIONS

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

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

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

Notification: I Understand

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

I certify that to the best knowledge of any of the individuals listed within this application, there are no background events that have arisen since the issuance of the establishment's final license that would raise suitability issues in accordance with 935 CMR 500.801.: I Agree

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

Progress or Success Goal 1

Description of Progress or Success: Please see attached documentation.

COMPLIANCE WITH DIVERSITY PLAN

Diversity Progress or Success 1

Description of Progress or Success: Please see attached documentation.

HOURS OF OPERATION

Monday From: 10:00 AM	Monday To: 8:00 PM
Tuesday From: 10:00 AM	Tuesday To: 8:00 PM
Wednesday From: 10:00 AM	Wednesday To: 8:00 PM
Thursday From: 10:00 AM	Thursday To: 8:00 PM
Friday From: 10:00 AM	Friday To: 9:00 PM
Saturday From: 10:00 AM	Saturday To: 9:00 PM
Sunday From: Closed	Sunday To: Closed



PREMIUM **2013** CANNABIS

.....
GROWN WITH CARE IN CENTRAL MASSACHUSETTS
CANNABIS PURVEYORS
.....

*We help people
live their best lives
by expanding
access to
safe, legal and
natural cannabis
products.*



- **GRI Overview**
 - Sales Channels & Dispensaries
 - Products & Brands
 - Cultivation & Processing
 - Professional Team
- **The Investment Opportunity**
- **Looking Ahead**
- **Exhibits**
 - Exhibit A: Senior Management Bios

Timeline



2013-2015:

Vision + Beginnings

- **GRI founded 2013**
- Political advocacy
- Newton political+ legal process
- Investment recruitment begins
- GRI brand launch



2016:

Business Blossoms

- **First seeds planted 05/05/2016**
- Political initiatives continue, GRI matures
- **11/16/2016: Newton Dispensary Opens**



2017:

Operations Expand

- Brand expansion
- Retail sales grow
- Cultivation Phase II planned
- **Home Delivery launches**



2018:

Political Battles, Won

- Opt Out defeated
- Adult use permits
- New branding, PR
- **11/16/2018: Melrose Dispensary Opens**



2019:

Retail Maturation

- 1Q: Adult use begins, expands
- **Marlborough opens**
- 7East Vape Pens & other brands launch
- Multi-state expansion





GRI OVERVIEW

Sales Channels





GRI is one of the most experienced and robust Massachusetts cannabis companies; we've been growing, cultivating, and dispensing cannabis since 2016.

Where it starts: Fitchburg Cultivation & Processing Facility

- GRI's cannabis is grown to the best organic standards, that also meets the rigorous testing standards of the Department of Health and Cannabis Control Commission.
- GRI products are researched, tested and once approved, produced, processed and packaged in our state-of-the-art laboratory.
- Our commercial kitchen creates edibles, under the management of professional Chefs.

Where product connects with customers:

- GRI provides more than 50 cannabis products to more than 1,200 customers per week.
- Home delivery reaches 6 Massachusetts counties
- GRI opened its Newton dispensary on November 15, 2016, one of the first medical marijuana dispensaries in Massachusetts. We have received top social media patient reviews for strong medical knowledge and a friendly, comfortable atmosphere.
- GRI's Patient Care Advocates (PCAs) encourage and teach patients to use edibles, tinctures or vaporizers rather than through smoking.
- GRI also educates patients on the proper and medically-safe usage of all forms of medical cannabis and the appropriate dosing techniques.
- New products are continuously under development, responding to customer demand and feedback.

State-of-the-Art Cultivation & Processing (Fitchburg, MA)



GRI planted its first 1,500 seeds in May 2016.

- As the largest cultivation facility in Massachusetts (82,045 sq. ft.), GRI's grow operation is a unique and critical competitive advantage over other cannabis companies because it offers a reliably large production volume and diverse cannabis product mix – critical for medical and adult use.
- GRI uses a sophisticated, automated “seed-to-sale” inventory tracking system enabling its staff to efficiently manage DPH's extensive compliance and reporting requirements at both the cultivation facility and in its Newton dispensary as well. GRI works closely with its DPH counterpart to ensure that all compliance directives are properly implemented and monitored.



Fitchburg Operating Summary



Size:

82,045 sq. ft. Total

Cultivation & Processing: 19,345 sq.ft. (P1), 17,005 sq. Ft. (P2),

Office: 7,445 sq. Ft.

Expansion Capacity: 38,250 sq. Ft.

Features:

Surveillance cameras throughout

Employee locker rooms with showers, Air Showers before clean room areas

Cultivation:

Clone Room, Transplant Room, Mother Room, 3 Large Vegetation Rooms, 6 Large Grow Rooms, 3 Drying & Cure Rooms, Large Trimming Room, Container Washing Room

Processing:

Commercial Kitchen for Medically-Infused Products ('MIPS'), with walk-in Refrigerator/Freezer Two Lab/Extract Rooms for concentrate production, Packaging Area, Secured Storage Room, Delivery Area Secured Entrance Area

Newton Dispensary



Newton Dispensary Operating Summary



- Size:** 1,700 sq. ft., on 2 levels
- Main Floor:** Entrance – secured control area (*Initial patient screening before access*)
Surveillance cameras throughout
5 Patient Care Stations (*each with medical product inventory & payment capacity*)
Patient Consultation room
Product displayed behind glass-lit shelving wall in patient waiting area
Restroom (*handicapped access*)
Exit area (*to internal building lobby*)
- Basement:** Employee break room
Secured storage and equipment area (*large limited-access secured room*)
- Staff on site:** Approximately 6 employees, depending on time of day
- Hours:** Monday to Saturday: 10:00 am to 8:00 pm

Melrose Dispensary



Melrose Dispensary (Opened Nov. 16, 2018)



Size: 5,000 sq. ft., on 1 levels

Front of the house:

Entrance – secured control area (*Initial patient screening before access*)
Surveillance cameras throughout
5 Patient Care Stations (*each with medical product inventory & payment capacity*)
Patient Consultation room
Product displayed behind glass-lit shelving wall in patient waiting area
Restroom (*handicapped access*)
Exit area (*to internal building lobby*)

Back of the house:

Employee break room
Secured storage and equipment area (*large limited-access secured room*)

Staff on site: Approximately 10 employees, depending on time of day

Hours: Monday to Saturday: 8:00 am to 8:00 pm
Sunday: 12:00pm – 6:00pm

Marlborough Dispensary - Opening Spring 2019



Marlborough Dispensary - Opening Spring 2019



Size: 3,300 sq. ft., on 1 levels

Front of the house:

Entrance – secured control area (*Initial patient screening before access*)
Surveillance cameras throughout
8 Patient Care Stations (*each with medical product inventory & payment capacity*)
Patient Consultation room
Product displayed behind glass-lit shelving wall in patient waiting area
Restroom (*handicapped access*)
Exit area (*to internal building lobby*)

Back of the house:

Employee break room
Secured storage and equipment area (*large limited-access secured room*)

Staff on site: Approximately 10 employees, depending on time of day

Hours: Monday to Saturday: 10:00 am to 8:00 pm
Sunday: 12:00pm – 6:00pm

Dispensary Product Mix



Flower: Multiple strains, pre-rolls, travel packs

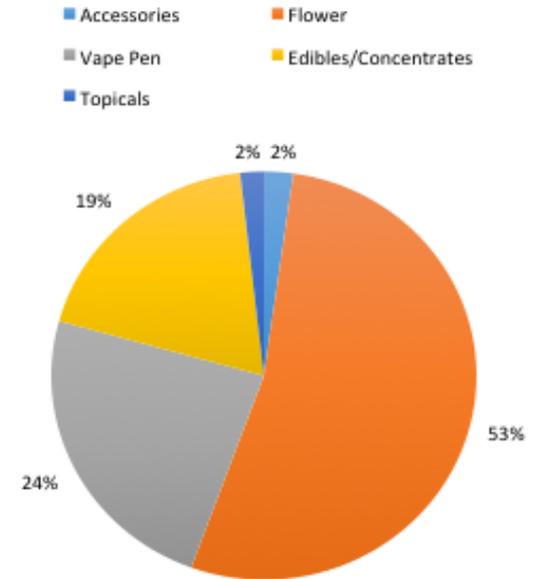
Vape Pens: 300mg & 500mg Cartridges, often strain-specific

Tinctures: CBD/THC mix and THC

Capsules: 10 Packs, including CBD capsules

Spa Products: Topical lotions, oils, bath salts, body scrubs, lotion bars and bath bombs

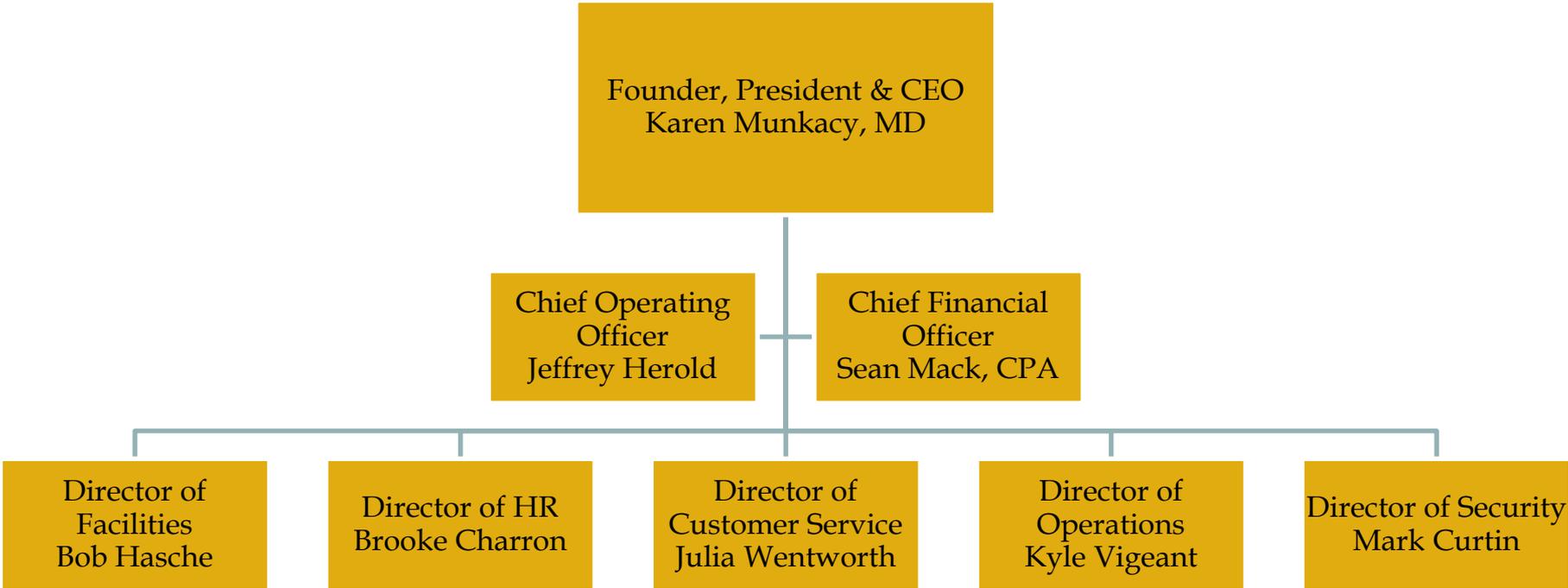
Marijuana Infused Products (MIPS): Rosins, sap, kief, Rick Simpson Oil, Terpene Rich Extract, and edible products, including chocolates, hard candies, fruit gummies, caramels, chocolate chip cookies, infused sugar and honey



Garden Remedies Team



GRI has in place a Board of Directors and Senior Management Team with the experience and expertise needed for the emerging cannabis industry; the knowledge, skills and ability to properly manage, direct and control multiple dispensaries and a cultivation facility in the interests of public health and safety.



Contact Details



Karen Munkacy, MD
President & CEO

karenm@gardenremedies.org

Cell: +1-732 236-4517

Jeff Herold

COO

jeffreyh@gardenremedies.org

Cell: +1-617-543-8181

307 Airport Road

Fitchburg, Ma 01420

www.gardenremedies.org

Karen Munkacy, MD – President & CEO



Dr. Munkacy, is a physician, mother and breast cancer survivor (cured 2005), who began her public health care advocacy with MMJ legalization in June 2011 when she testified in front of the Massachusetts State Legislature’s Public Health Committee in favor of MMJ. Ultimately, with funding from the late Peter Lewis (the founder of Progressive Insurance Company, and former Princeton University trustee who financially supported MMJ initiatives nationwide for many years), Dr. Munkacy worked in conjunction with a major Boston-based political/lobbying group and was able to get MMJ legalization on the November 2012 ballot. Dr. Munkacy works for GRI on a full-time basis as its CEO and President.

Prior to her MMJ advocacy work, Dr. Munkacy had more than 30 years’ experience in the medical and public health fields. After being diagnosed with breast cancer in 2004 and surviving the debilitating effects of her treatments, Dr. Munkacy knew there had to be a better way to alleviate the pain and suffering that breast cancer victims had endured. During her treatments, medical colleagues reported that MMJ was effective in treating symptoms like hers; because she did not want to break the law, Dr. Munkacy chose not to use the treatment.

Dr. Munkacy extensively researched medical marijuana (MMJ) and learned that the drug had a broad base of scientific evidence, medical support and patient interest. In an effort to spare others suffering, she began to speak about her experience and to encourage lawmakers and health care associations to support compassionate legislation to allow the use of medical marijuana to alleviate patient pain and discomfort across multiple illnesses.

In 2011, Dr. Munkacy became a board member of Americans for Safe Access. As an unpaid medical advisor, Dr. Munkacy has written editorials and has testified in front of lawmakers and administrative committees, medical specialists, law enforcement officials, and community organizations on the efficacy of medical marijuana treatment.

In addition to being an MMJ advocate, Dr. Munkacy is board certified in anesthesiology and fellowship trained in pain medicine; she has worked as a researcher and international medical consultant and advisor. Dr. Munkacy served as an assistant professor at UCLA and USC Medical Centers (Los Angeles, CA). She graduated from the University of Michigan with a B.S. in Biomedical Science and received her medical degree at the University of Michigan Medical School. She also was a Delegate to the Massachusetts Medical Society (which has over 24,000 physician members).



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

10/11/2019

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Clark Agency, LLC dba May Bonee & Clark 180 Glastonbury Boulevard Glastonbury, CT 06033	CONTACT NAME: PHONE (A/C, No, Ext): (860) 430-3700	FAX (A/C, No): (860) 430-3730
	E-MAIL ADDRESS:	
	INSURER(S) AFFORDING COVERAGE	
	INSURER A : James River Insurance Company	
	INSURER B : Protective Insurance	
	INSURER C :	
	INSURER D :	
	INSURER E :	
	INSURER F :	

INSURED

Garden Remedies Holdings LLC
 307 Airport Road
 Fitchburg, MA 01420

COVERAGES

CERTIFICATE NUMBER:

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:			00086513-0	10/24/2018	10/24/2019	EACH OCCURRENCE \$ 5,000,000
							DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 50,000
							MED EXP (Any one person) \$ Excluded
							PERSONAL & ADV INJURY \$ 5,000,000
							GENERAL AGGREGATE \$ 5,000,000
							PRODUCTS - COMP/OP AGG \$ Excluded
							\$
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident) \$
							BODILY INJURY (Per person) \$
							BODILY INJURY (Per accident) \$
							PROPERTY DAMAGE (Per accident) \$
							\$
	UMBRELLA LIAB <input type="checkbox"/> OCCUR EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED <input type="checkbox"/> RETENTION \$						EACH OCCURRENCE \$
							\$
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) <input type="checkbox"/> Y / N <input checked="" type="checkbox"/> N / A If yes, describe under DESCRIPTION OF OPERATIONS below			SS-2306690-01	12/4/2018	12/4/2019	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER \$
							E.L. EACH ACCIDENT \$ 1,000,000
							E.L. DISEASE - EA EMPLOYEE \$ 1,000,000
							E.L. DISEASE - POLICY LIMIT \$ 1,000,000
A	Products & Completed			00086512-0	10/24/2018	10/24/2019	Prod & Comp Ops Agg \$ 5,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
 Re: 732 Newburyport Tpk, Melrose, MA 02176
 Cannabis Inventory \$220,000, contents \$242,494, tenants improvements \$1,300,000

CERTIFICATE HOLDER

CANCELLATION

Garden Remedies, Inc.	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE 

Host Community Agreement Certification Form

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

Applicant

I, Dr. Karen Munkacy, certify as an authorized representative of Garden Remedies, Inc. that the applicant has executed a host community agreement with the City of Newton pursuant to G.L.c. 94G § 3(d) on April 12, 2018.

Karen Munkacy MD

Dr. Karen Munkacy
Signature of Authorized Representative of Applicant

Host Community

I, Mayor Ruthanne Fuller, certify that I am the contracting authority or have been duly authorized by the contracting authority for the City of Newton to certify that the applicant and the City of Newton have executed a host community agreement pursuant to G.L.c. 94G § 3(d) on April 12, 2018.

Ruthanne Fuller

Mayor Ruthanne Fuller
Signature of Contracting Authority or
Authorized Representative of Host Community

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, Dr. Karen Munkacy, attest as an authorized representative of Garden Remedies, Inc. 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 March 29, 2018.
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 March 21, 2018, 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 March 26, 2018 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 March 19, 2018, 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.

**MARIJUANA RETAIL SALES
LEGAL NOTICE
NOTICE OF COMMUNITY OUTREACH
MEETING
REGARDING PROPOSAL OF GARDEN
REMEDIES, INC.
TO INCLUDE ADULT-USE MARIJUANA
RETAIL SALES AT ITS CURRENT
MEDICAL USE OF MARIJUANA
DISPENSARY AT
697 WASHINGTON STREET, NEWTON,
MASSACHUSETTS**

Garden Remedies, Inc. ("Garden Remedies") will be hosting a Community Outreach Meeting ("the Meeting") on March 29, 2018 at The Workshop of the Woman's Club of Newton Highlands, 72 Columbus Street, Newton, Massachusetts at 7:00 p.m. Members of the public are encouraged to attend the Meeting, at which Garden Remedies, which currently operates a Medical Use of Marijuana Dispensary at 697 Washington Street, Newton, Massachusetts (the "Property"), will outline its proposal to apply for an Adult-Use Marijuana Retailer license at the Property pursuant to M.G.L. Chapter 94G and Chapter 55 of the Acts of 2017, and other applicable laws and regulations promulgated thereunder, including those promulgated by the Massachusetts Cannabis Control Commission.

Information presented at the Community Outreach Meeting will include, but not be limited to, the following:

1. The type of Adult-Use Marijuana Establishment to be located at the Property.
2. Information adequate to demonstrate that the Adult-Use Marijuana Establishment location will be maintained securely.
3. Steps to be taken by the Adult-Use Marijuana Establishment to prevent diversion to minors.
4. A plan by the Adult-Use Marijuana Establishment to positively impact the community.
5. Information adequate to demonstrate that the location will not constitute a nuisance to the community by noise, odor, dust, glare, fumes, vibration, heat, or other conditions likely to cause nuisance.

Members of the Newton community will be encouraged to ask questions and to engage in discussions with representatives of Garden Remedies.

A copy of this notice is on file with the office of the City Clerk and with the office of the City Council, Newton City Hall, 1000 Commonwealth Avenue, Newton, Massachusetts. A copy of this notice was mailed at least seven calendar days prior to the Community Outreach Meeting to abutters of the Property, abutters to abutters within three hundred feet of the Property, and the owners of land directly opposite the Property on any public or private street or way, all 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.

AD# 13670170
Newton TAB 3/21/18

**NOTICE OF COMMUNITY OUTREACH MEETING
REGARDING PROPOSAL OF GARDEN REMEDIES, INC.
TO INCLUDE ADULT-USE MARIJUANA RETAIL SALES AT ITS CURRENT MEDICAL USE OF
MARIJUANA DISPENSARY AT
697 WASHINGTON STREET, NEWTON, MASSACHUSETTS**

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ATTACHMENT C
NOTICE TO ABUTTERS AND PARTIES OF INTEREST

**NOTICE OF COMMUNITY OUTREACH MEETING
REGARDING PROPOSAL OF GARDEN REMEDIES, INC.
TO INCLUDE ADULT-USE MARIJUANA RETAIL SALES AT ITS CURRENT MEDICAL USE OF
MARIJUANA DISPENSARY AT
697 WASHINGTON STREET, NEWTON, MASSACHUSETTS**

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2. Information adequate to demonstrate that the Adult-Use Marijuana Establishment location will be maintained securely.
3. Steps to be taken by the Adult-Use Marijuana Establishment to prevent diversion to minors.
4. A plan by the Adult-Use Marijuana Establishment to positively impact the community.
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A copy of this notice is on file with the office of the City Clerk and with the office of the City Council, Newton City Hall, 1000 Commonwealth Avenue, Newton, Massachusetts. A copy of this notice was mailed at least seven calendar days prior to the Community Outreach Meeting to abutters of the Property, abutters to abutters within three hundred feet of the Property, and the owners of land directly opposite the Property on any public or private street or way, all 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.

Host Community Agreement Certification Form

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

Applicant

I, Dr. Karen Munkacy, certify as an authorized representative of Garden Remedies, Inc. that the applicant has executed a host community agreement with the City of Newton pursuant to G.L.c. 94G § 3(d) on April 12, 2018.

Karen Munkacy MD
Dr. Karen Munkacy
Signature of Authorized Representative of Applicant

Host Community

I, Mayor Ruthanne Fuller, certify that I am the contracting authority or have been duly authorized by the contracting authority for the City of Newton to certify that the applicant and the City of Newton have executed a host community agreement pursuant to G.L.c. 94G § 3(d) on April 12, 2018.

Ruthanne Fuller
Mayor Ruthanne Fuller
Signature of Contracting Authority or
Authorized Representative of Host Community

Garden Remedies, Inc. Plan to Remain Compliant with Local Zoning

A Site Plan Review and Special Permit was approved and granted to GRI by City of Fitchburg on August 21, 2018 for Adult Use Cultivation and Processing of Marijuana.

The following information was submitted to the City of Fitchburg in order to receive GRI's approval as an experienced operator under the City of Fitchburg's Marijuana Establishments (ME) Ordinance Section 181.6542.

181.6542 An Experienced Operator may operate a ME of the same type as the medical marijuana facility for which they have been granted a special permit and approved site plan review by the City without obtaining a new special permit, provided that the Experienced Operator must receive site plan approval for the new use as a ME, that the ME is located in the same facility for which the Experienced Operator received the prior special permit and site plan approval, and that the gross square footage of such facility is not increased by more than ten (10%) percent.

1. Shall continue to attend the "look-back" review meetings with staff from the Planning Department, Transportation Division of the Public Works Department and the Newton Police Department at intervals of 6, 12, 18 and 24 months.
2. Hours of operation will maintain to be from 10 a.m. to 8:00 p.m. Monday through Thursday, and from 10 a.m. to 9:00 p.m. on Friday and Saturdays; the Marijuana establishment shall not be open on Sundays.
3. We will maintain that no more than 12 employees on site at any one time.
4. Continue to adhere to the implements set by the Transportation Demand Management Plan to prevent employees from occupying parking stalls both in the surface parking facility and on-street parking stall.
5. Continue to employ a City of Newton Police Detail on site from the hours of 5 p.m. to 10 p.m. during operating days.
6. Employ a security professional to monitor the property, including the surface parking lot, during all operating hours. The security professional is and will always be available to consult with the Newton Police Department, Newton Fire Department, and any law enforcement agencies.
7. limit on-site transactions to one ounce of marijuana, or its equivalent in whatever form the marijuana is dispensed, per customer per site visit, with the

balance of the order, if any, delivered to customers' homes, provided home delivery is allowed by the Cannabis Control Commission.

8. Maintain registration with the Massachusetts Department of Public Health and/or the Cannabis Commission. Within 1 week from the date of the initial and annual renewal of its registration, the Garden Remedies Inc. shall file a copy of the same with the Clerk of the City Council, the Commissioner of Inspectional Services, and the Planning Department. Garden Remedies Inc. shall immediately notify the Clerk of the City Council, the Commissioner of Inspectional Services and the Planning Department if its registration is not renewed or is revoked.



Compassionate Relief. Rooted in Medicine.

Persons or Entities Having Direct or Indirect Authority

Paula Nickerson, who served in the role of controller, transitioned out of Garden Remedies over the summer, gradually transferring all work to the Finance team under the direction of GRI's new Chief Financial Officer, Sean Mack. As of September 17th, 2018, her work was fully transitioned and she is no longer employed by Garden Remedies or performing work for the company in any capacity. Ms. Nickerson's separation was not related to her qualifications, the quality of her work, or any financial discrepancies or wrongdoing. Ms. Nickerson's departure did not impact in any way the company's compliance with its legal obligations or its commitment to offering the safest, best products.

Examiner

The Commonwealth of Massachusetts

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

ARTICLES OF ORGANIZATION (General Laws, Chapter 180)

KK
Name
Approved

ARTICLE I

The exact name of the corporation is:

Garden Remedies, Inc.

ARTICLE II

The purpose of the corporation is to engage in the following activities:

See Attached.

C
P
M
R.A.

7

P.C.

Note: If the space provided under any article or item on this form is insufficient, additions shall be set forth on one side only of separate 8 1/2 x 11 sheets of paper with a left margin of at least 1 inch. Additions to more than one article may be made on a single sheet so long as each article requiring each addition is clearly indicated.

Garden Remedies, Inc.
Articles of Organization
Article II: Purposes

The corporation is organized for nonprofit purposes including, but not limited to, providing wellness services to patients suffering from debilitating medical conditions; educating patients and community stakeholders about wellness and public health; and engaging in community activities related to wellness and public health. As permitted by law, the corporation may engage in any and all activities in furtherance of, related to, or incidental to these purposes, the activities being lawful for a corporation formed under Chapter 180 of the General Laws of Massachusetts. Any revenue from the corporation shall be used solely in furtherance of the corporation's nonprofit purposes.

ARTICLE III

A corporation may have one or more classes of members. If it does, the designation of such classes, the manner of election or appointments, the duration of membership and the qualification and rights, including voting rights, of the members of each class, may be set forth in the by-laws of the corporation or may be set forth below:

May Be Set Forth in Bylaws.

ARTICLE IV

**Other lawful provisions, if any, for the conduct and regulation of the business and affairs of the corporation, for its voluntary dissolution, or for limiting, defining, or regulating the powers of the corporation, or of its directors or members, or of any class of members, are as follows:

See Attached.

ARTICLE V

The by-laws of the corporation have been duly adopted and the initial directors, president, treasurer and clerk or other presiding, financial or recording officers, whose names are set out on the following page, have been duly elected.

***If there are no provisions, state "None".*

Note: The preceding four (4) articles are considered to be permanent and may only be changed by filing appropriate Articles of Amendment.

Garden Remedies, Inc.
Articles of Organization
Article IV: Other Provisions

The corporation is organized exclusively for nonprofit purposes. No part of the net earnings of the corporation shall inure to the benefit of, or be distributable to its directors, officers, or other private persons, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes of the corporation.

In the event of dissolution of the corporation, the board of directors shall, after paying or making provisions for the payment of all of the liabilities of the corporation, dispose of all the assets of the corporation exclusively for the purposes of the corporation, as the board of directors shall determine, in accordance with the statutes of the Commonwealth of Massachusetts.

No officer or director of the corporation shall be personally liable to the corporation for monetary damages for or arising out of a breach of fiduciary duty as an officer or director notwithstanding any provision of law imposing such liability; provided, however, that the foregoing shall not eliminate or limit the liability of an officer or director to the extent that such liability is imposed by applicable law (i) for a breach of the officer's or director's duty of loyalty to the corporation or its members, (ii) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of the law, or (iii) for any transaction from which the officer or director derived an improper personal benefit.

The corporation shall, to the extent legally permissible, indemnify each person who may serve or who has served at any time as an officer or director of the corporation against all expenses and liabilities, including, without limitation, counsel fees, judgments, fines, excise taxes, penalties and settlement payments, reasonably incurred by or imposed upon such person in connection with any threatened, pending or completed action, suit or proceeding in which he or she may become involved by reason of his or her service in such capacity; provided that no indemnification shall be provided for any such person with respect to any matter as to which he or she shall have been finally adjudicated in any proceeding not to have acted in good faith in the reasonable belief that such action was in the best interests of the corporation; and further provided that any compromise or settlement payment shall be approved by a majority vote of a quorum of directors who are not at that time parties to the proceeding.

The indemnification provided hereunder shall inure to the benefit of the heirs, executors and administrators of persons entitled to indemnification hereunder. The right of indemnification under this Article shall be in addition to and not exclusive of all other rights to which any person may be entitled.

This Article constitutes a contract between the corporation and the indemnified officers and directors. No amendment or repeal of the provisions of this Article which adversely affects the right of an indemnified officer or director under this Article shall apply to such officer or director with respect to those acts or omissions which occurred at any time prior to such amendment or repeal.

ARTICLE VI

The effective date of organization of the corporation shall be the date approved and filed by the Secretary of the Commonwealth. If a later effective date is desired, specify such date which shall not be more than thirty days after the date of filing.

ARTICLE VII

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

a. The street address (post office boxes are not acceptable) of the principal office of the corporation in Massachusetts is:

60 Kendrick Street
Needham, MA 02494

b. The name, residential address and post office address of each director and officer of the corporation is as follows:

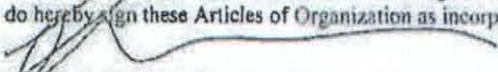
	NAME	RESIDENTIAL ADDRESS	POST OFFICE ADDRESS
President:			
Treasurer:	See Attached.		
Clerk:			
Directors: (or officers having the powers of directors)			

c. The fiscal year of the corporation shall end on the last day of the month of: December

d. The name and business address of the resident agent, if any, of the corporation is: NA

I/We, the below signed incorporator(s), do hereby certify under the pains and penalties of perjury that I/we have not been convicted of any crimes relating to alcohol or gaming within the past ten years. I/We do hereby further certify that to the best of my/our knowledge the above-named officers have not been similarly convicted. If so convicted, explain.

IN WITNESS WHEREOF AND UNDER THE PAINS AND PENALTIES OF PERJURY, I/we, whose signature(s) appear below as incorporator(s) and whose name(s) and business or residential address(es) are clearly typed or printed beneath each signature, do hereby associate with the intention of forming this corporation under the provisions of General Laws, Chapter 180 and do hereby sign these Articles of Organization as incorporator(s) this 22 day of July, 2013.



Tracey Bolotnick
Hurwit & Associates, 1150 Walnut Street, Newton, MA 02461

Note: If an existing corporation is acting as incorporator, type in the exact name of the corporation, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said corporation and the title he/she holds or other authority by which such action is taken.

Garden Remedles, Inc.
Articles of Organization
Article VII: Officers and Directors

Officers

Dr. Karen Munkacy, MD, President
60 Kendrick Street
Needham, MA 02494

Dr. Karen Munkacy, MD, Treasurer
60 Kendrick Street
Needham, MA 02494

Dr. Karen Munkacy, MD, Clerk
60 Kendrick Street
Needham, MA 02494

Directors

Dr. Karen Munkacy, MD
60 Kendrick Street
Needham, MA 02494

CK#6863

THE COMMONWEALTH OF MASSACHUSETTS

ARTICLES OF ORGANIZATION
(General Laws, Chapter 180)

I hereby certify that, upon examination of these Articles of Organization, duly submitted to me, it appears that the provisions of the General Laws relative to the organization of corporations have been complied with, and I hereby approve said articles; and the filing fee in the amount of \$65 having been paid, said articles are deemed to have been filed with me this 26 day of July 2013

1202768

Effective date: _____

WILLIAM FRANCIS GALVIN
Secretary of the Commonwealth

SECRETARY OF THE COMMONWEALTH
2013 JUL 22 PM 12:03
CORPORATIONS DIVISION

TO BE FILLED IN BY CORPORATION
Contact information:

Adam Fine
Vicente Sederberg LLC
77 Franklin Street, Floor 3
Boston, MA 02110

Telephone: (617) 299-6650

Email: Adam@VicenteSederberg.com

A copy this filing will be available on-line at www.state.ma.us/sec/cor once the document is filed.

BYLAWS
of
GARDEN REMEDIES, INC.

July 23, 2014

BYLAWS
of
GARDEN REMEDIES, INC.

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BYLAWS
Of
GARDEN REMEDIES, INC.

January 4, 2016

ARTICLE 1

General Provisions

Section 1.1 Name. The name of this corporation is Garden Remedies, Inc. and shall herein be referred to as "the corporation."

Section 1.2 Offices. The principal business office of the corporation shall be at 116 Chestnut Hill Rd., Newton MA 02467. The corporation may also have offices at such other places as the corporation may require.

Section 1.3 Fiscal Year. The fiscal year of the corporation shall begin on January 1 and end on the following December 31 of each year.

Section 1.4 No Voting Members. The corporation shall have no voting members. All powers of the corporation shall be held by the board of directors. Any action or vote required or permitted by any law, rule, or regulation to be taken by members shall be taken by action or vote of the same percentage of the board of directors of the corporation. No person now or hereafter designated by the corporation as a "member" for fundraising or other purposes shall be or be deemed to be a member for purposes of the Articles of Organization or bylaws of the corporation nor shall such person have any voting or fiduciary rights or responsibilities of the corporation.

ARTICLE 2

Statement of Purposes

The corporation is organized for nonprofit purposes including, but not limited to, providing wellness services to patients suffering from debilitating medical conditions; educating patients and community stakeholders about wellness and public health; and engaging in community activities related to wellness and public health. As permitted by law, the corporation may engage in any and all activities in furtherance of, related to, or incidental to these purposes, the activities being lawful for a corporation formed under Chapter 180 of the General Laws of Massachusetts. All Registered Medical Dispensaries (RMDs) related to the corporation shall at all times operate on a non-profit basis for the benefit of registered qualifying patients, and shall ensure that any revenue from the corporation's RMD(s) shall be used solely in furtherance of the corporation's nonprofit purposes.

ARTICLE 3

Board of Directors

Section 3.1 Authority. The business and affairs of the corporation shall be controlled and governed by the board of directors, which shall have the right to exercise all powers of the corporation as permitted by law.

Section 3.2 Composition. The number of directors and the manner by which new directors are nominated and appointed shall be determined by the directors.

Section 3.3 Terms of Office. Except as provided herein, the board of directors shall determine the length and number of terms to be served by directors.

Section 3.4 Meetings. The board of directors shall hold annual meetings each year and may select the time and place for annual and other meetings of the board. Other meetings of the board of directors may be called by the president or by a majority of the directors then in office by delivering notice in writing, of the date, time, place, and purpose of such meeting, to all directors at least three (3) days in advance of such meeting.

Section 3.5 Quorum and Voting. A majority of the board of directors shall constitute a quorum for the transaction of business at any meeting of the board. At any meeting of the board of directors at which a quorum is present, a majority of those directors present shall decide any matter, unless a different vote is specified by law, the Articles of Organization, or these bylaws.

Section 3.6 Meetings by Remote Communication. One or more directors may attend any annual, regular, special, or committee meeting of the board through telephonic, electronic, or other means of communication by which all directors have the ability to fully and equally participate in all discussions and voting on a substantially simultaneous basis. Such participation shall constitute presence in person at such meeting.

Section 3.7 Action Without a Meeting. Any action required or permitted to be taken at any board meeting may be taken without a meeting if a consent in writing, setting forth the action to be taken, shall be signed by all of the directors with respect to such subject matter. Such consent, which may be signed in counterparts, shall have the same force and effect as a vote of the board of directors.

Section 3.8 Waiver of Notice for Meetings. Whenever any notice of a meeting is required to be given to any director under the Articles of Organization, these bylaws, or the laws of Massachusetts, a waiver of notice in writing signed by the director, whether before or after the time of the meeting, shall be equivalent to the giving of such notice.

Section 3.9 Committees. The board of directors may create such standing and special committees as it determines to be in the best interest of the corporation. The board of directors shall determine the duties, powers, and composition of such committees, except that the board shall not delegate to such committees those powers which by law may not be delegated. Each such committee shall submit to the board of directors at such meetings as the board may designate, a report of the actions and recommendations of such committees for consideration and approval by the board of directors. Any committee may be terminated at any time by the board of directors.

Section 3.10 Compensation. Directors as such shall not receive any salaries for their services on the board, but directors shall not be precluded from serving the corporation in any other capacity and receiving reasonable compensation.

Section 3.11 Resignation. Any director may resign by delivering a written resignation to the corporation at its principal office or to the president or clerk. Such resignation shall be effective upon receipt unless it is specified to be effective at some later time.

Section 3.12 Removal. Except as provided herein, any director may be removed, with or without assignment of cause, by a vote of the majority of the entire board of directors at any meeting of the board of directors. No member of the board shall be removed from office unless the notice of the meeting at which removal is to be considered states such purpose and opportunity to be heard at such meeting is given to the director whose removal is sought. Notwithstanding the notice provision of Section 3.4 above, written notice shall be delivered to all directors at least fourteen (14) days in advance of a meeting at which removal is sought. Founding Directors Ken or Karen Munkacy shall be directors in perpetuity and may only be removed for Cause upon a 3/4 vote of the disinterested directors. For the purpose of this Section "Cause" shall mean if any director: (1) fails to qualify as a dispensary agent as determined by the Massachusetts Department of Public Health ("DPH"); (2) is found unsuitable or unqualified to sit as director of a registered marijuana dispensary as determined by DPH pursuant to written notice to the non-profit; (3) engages in any negligent, reckless, or intentional action or inaction that causes substantial financial or reputational injury to the non-profit, or jeopardizes the non-profits ability to receive or a renew a marijuana dispensary permit, as determined in a written opinion of the non-profit's legal counsel; or (4) or disability of the director such that the director cannot perform the director's duties for a period equal to ninety (90) days in any three hundred sixty-five (365) day period.

Section 3.13 Vacancies. Any vacancy occurring in the board of directors shall be filled by the board of directors in accordance with Section 3.2. A director elected to fill a vacancy shall be elected for the unexpired term of his or her predecessor in office.

ARTICLE 4

Officers

Section 4.1 Officers. The officers of the corporation shall be a president, a treasurer, and a clerk of the board of directors and such other officers as may be elected in accordance with the provisions of this Article.

Section 4.2 Election. The officers of the corporation shall be elected annually by the board of directors at the annual meeting. Each officer shall hold office until a successor shall have been elected and qualified.

Section 4.3 Vacancies. A vacancy in any office because of death, resignation, disqualification, or otherwise may be filled by the board of directors for the unexpired portion of the term.

Section 4.4 Removal. Any officer may be removed, with or without assignment of cause, by a vote of a majority of the entire board of directors at any meeting of the board of directors. No officer shall be removed from office unless the notice of the meeting at which removal is to be considered states such purpose and opportunity to be heard at such meeting is given to the officer whose removal is sought. Notwithstanding the notice provision of Section 3.4 above, written notice shall be delivered to all directors at least fourteen (14) days in advance of a meeting at which removal is sought.

Section 4.5 President. The president shall preside at all meetings of the board of directors. The president, or other proper officer or agent of the corporation authorized by the board of directors, may sign any deeds, mortgages, bonds, contracts, or other instruments which the board of directors has authorized to be executed. The president shall perform all duties incident to the office of president and such other duties as may be prescribed by the board of directors from time to time.

Section 4.7 Treasurer. The treasurer, or other proper officer or agent of the corporation authorized by the board of directors, shall have charge and custody of and be responsible for all funds and securities of the corporation; receive and give receipt for moneys due and payable to the corporation from any source whatsoever, and deposit all such moneys in the name of the corporation in such banks, trust companies, or other depositories as shall be selected by the board of directors; and in general perform all of the duties incident to the office of treasurer and such others as may from time to time be assigned by the board of directors.

Section 4.8 Clerk. The clerk shall keep the minutes of the meetings of the board of directors in one or more books provided for that purpose; ensure that all notices are given in accordance with the provisions of these bylaws; be custodian of the corporate records; and in general perform all such duties as may from time to time be assigned by the board of directors.

ARTICLE 5

Corporate Transactions

Section 5.1 Contracts. The board of directors may authorize any officer or officers, agent or agents of the corporation in addition to the officers so authorized by these bylaws, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the corporation, and such authority may be general or confined by specific instances.

Section 5.2 Indebtedness. All checks, drafts, or orders for the payment of money, notes, or other evidence of indebtedness issued in the name of the corporation, shall be signed by the president or treasurer, or such other officer or agent of the corporation as from time to time may be determined by the board of directors. In the absence of such determination of the board, such instruments shall be signed by the president or treasurer of the corporation.

Section 5.3 Deposits. All funds of the corporation shall be deposited from time to time to the credit of the corporation in such banks, trust companies, brokerages, or other depositories as the board of directors shall select.

ARTICLE 6

Books and Records

The corporation shall keep at the principal office of the corporation correct and complete books and records of account; minutes of the proceedings of board of directors; and a register of the names and addresses of the directors of the corporation. All books, and records of the corporation may be inspected by any director, or agent or attorney thereof, for any proper purpose at any reasonable time.

ARTICLE 7

Restrictions on Activities

No part of the net earnings of the corporation shall inure to the benefit of, or be distributable to its directors, officers, or other private persons, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes of the corporation.

ARTICLE 8

Dissolution

In the event of dissolution of the corporation, the board of directors shall, after paying or making provisions for the payment of all of the liabilities of the corporation, dispose of all the assets of the corporation exclusively for the purposes of the corporation, as the board of directors shall determine, in accordance with the statutes of the Commonwealth of Massachusetts.

ARTICLE 9

Conflicts of Interest

Whenever a director or officer has a financial or personal interest in any matter coming before the board of directors, the affected person shall a) fully disclose the nature of the interest and b) withdraw from discussion, lobbying, and voting on the matter. Any transaction or vote involving a potential conflict of interest shall be approved only when a majority of disinterested directors determine that it is in the best interest of the corporation to do so. The minutes of meetings at which such votes are taken shall record such disclosure, abstention and rationale for approval. This Article may be further defined by the directors in pursuant to a written policy incorporated herein.

ARTICLE 10

Personal Liability

No officer or director of the corporation shall be personally liable to the corporation for monetary damages for or arising out of a breach of fiduciary duty as an officer or director notwithstanding any provision of law imposing such liability; provided, however, that the foregoing shall not eliminate or limit the liability of an officer or director to the extent that such liability is imposed by applicable law (i) for a breach of the officer's or director's duty of loyalty to the corporation or its members, (ii) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of the law, or (iii) for any transaction from which the officer or director derived an improper personal benefit.

ARTICLE 11

Indemnification

The corporation shall, to the extent legally permissible, indemnify each person who may serve or who has served at any time as an officer or director of the corporation against all expenses and liabilities, including, without limitation, counsel fees, judgments, fines, excise taxes, penalties and settlement payments, reasonably incurred by or imposed upon such person in connection with any threatened, pending or completed action, suit or proceeding in which he or she may become involved by reason of his or her service in such capacity; provided that no indemnification shall be provided for any such person with respect to any matter as to which he or she shall have been finally adjudicated in any proceeding not to have acted in good faith in the reasonable belief that such action was in the best interests of the corporation; and further provided that any compromise or settlement payment shall be approved by a majority vote of a quorum of directors who are not at that time parties to the proceeding.

The indemnification provided hereunder shall inure to the benefit of the heirs, executors and administrators of persons entitled to indemnification hereunder. The right of indemnification under this Article shall be in addition to and not exclusive of all other rights to which any person may be entitled.

This Article constitutes a contract between the corporation and the indemnified officers and directors. No amendment or repeal of the provisions of this Article which adversely affects the right of an indemnified officer or director under this Article shall apply to such officer or director with respect to those acts or omissions which occurred at any time prior to such amendment or repeal.

ARTICLE 12

Amendments to Bylaws

These bylaws may be amended or repealed by a majority vote of the entire board of directors, provided however that amendment or repeal of Sections 3.12 and this Section 12, must also be approved by founding director, Dr. Karen Munkacy.

Article 13

Policies

The Board of Directors may adopt policies that shall be incorporated into these By-Laws. The following policies have been adopted and incorporated herein:

- Appendix 1: Conflict of Interest Policy
- Appendix 2: Whistleblower Policy
- Appendix 3: Document Retention and Destruction Policy
- Appendix 4: Compensation Setting Policy
- Appendix 5: Comprehensive Information Security Policy

Appendix 1

GARDEN REMEDIES, INC CONFLICT OF INTEREST POLICY

I. Definitions

For purposes of this policy, the term "interest" shall include any personal connection or connection as a director, officer, member, stockholder, shareholder, partner, manager, trustee, beneficiary, employee or consultant of any concern on the part of a director, officer or key employee of Garden Remedies, Inc. (the "Non-profit") or his/her immediate family member.

The term "concern" shall mean any corporation, association, trust, partnership, limited liability group, firm, person or entity other than the Non-profit.

II. Policy

No director, officer or key employee of the Non-profit shall be disqualified from holding any office or post in the Non-profit by reason of any interest in any concern. A director, officer or key employee of the Non-profit shall not be disqualified from engaging, either as vendor, purchaser or otherwise, or contracting or entering into any transaction with the Non-profit or with any entity of which the Non-profit is an affiliate, provided, however, that the following precautions are undertaken:

1. The interest of such director, officer or key employee is fully disclosed to the board of directors prior to its entering into the transaction.
2. No interested director, officer or key employee may vote or lobby (lobbying shall not include presenting to the board or a director about the benefits of the transaction) on the matter or be counted in determining the existence of a quorum at the meeting of the board of directors at which such matter is voted upon.
3. Any transaction in which a director, officer or key employee has an interest shall be duly approved by the disinterested directors as being in the best interest of the Non-profit. The disinterested directors shall seek and examine comparison data, showing the availability and price of alternative transactions, in making such determination.
4. Payments to the interested director, officer, or key employee shall be reasonable and shall not exceed fair market value.
5. The minutes of the meeting at which the disinterested directors vote on the transaction shall reflect that disclosure of the potential conflict was made, that the interested director(s) abstained from voting, the rationale for approval, and how each disinterested director voted. The minutes shall be prepared and finalized within 30 days of such meeting.

Directors, officers and key employees are required to disclose interests that could give rise to conflicts at least annually.

Appendix 2

GARDEN REMEDIES, INC WHISTLEBLOWER POLICY

I. Expectation

Garden Remedies, Inc.. (the "Non-profit") expects directors, officers and employees to observe high ethical standards in carrying out their responsibilities and to comply with all applicable laws and regulations.

II. Open Door Policy

If any director, officer or employee has complaints, concerns, or questions as to the ethics or legality of a particular action taken by another director, officer or employee, he/she is encouraged to raise such complaints, concerns or questions with the relevant individual. With respect to directors, the relevant individual is the chair of the board of directors or any other director. With respect to officers and employees, the relevant individual is the Executive Director, if there is one in office, and if not, any member of the board. In the event the director, officer or employee believes there may have been a legal transgression, and that it is not reasonable to raise the issue with a board member or the Executive Director, he/she should contact an outside attorney. Anyone filing a complaint concerning a violation or suspected violation of a law, regulation or ethical requirement must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Individuals making baseless or malicious accusations will be disciplined up to and including termination.

III. Requirement of Investigation

Within a reasonable time of receiving a complaint, concern or question regarding compliance with a law, regulation or ethics requirement, the Executive Director and/or board member shall open an investigation into the matter and pursue it to resolution. Should the Executive Director or board member find that a law, regulation or ethics requirement has been violated, appropriate action should be taken.

IV. Confidentiality

To the degree possible, the names of the individuals reporting under this Whistleblower Policy shall be kept confidential.

V. Protection from Retaliatory Action

Neither the Non-profit nor its managers may take any negative employment or other retaliatory action against any director, officer or employee who in good faith reports a violation of a law or regulatory requirement. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline including, but not limited to, termination of employment.

VI. General Policy

This general policy is not a contract and it may be rescinded or amended at any time by the Non-profit. It is not intended to and does not create any legally enforceable rights whatsoever for any employee.

GARDEN REMEDIES, INC.
DOCUMENT RETENTION AND DESTRUCTION POLICY

I. Retention Policy

Garden Remedies, Inc. (the "Non-profit") takes seriously its obligations to preserve information relating to litigation, audits, and investigations. The information listed in the retention schedule below is intended as a guideline and may not contain all the records the Non-profit may be required to keep in the future.

From time to time, the Non-profit may suspend the destruction of records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, government investigations, or similar proceedings.

File Category	Item	Retention Period
Corporate Records	<i>Bylaws and Articles of Incorporation</i>	Permanent
	<i>Corporate resolutions</i>	Permanent
	<i>Board and committee meeting agendas and minutes</i>	Permanent
	<i>Conflict-of-interest disclosure forms</i>	4 years
Finance and Administration	<i>Financial statements (audited)</i>	7 years
	<i>Auditor management letters</i>	7 years
	<i>Payroll records</i>	7 years
	<i>Check register and checks</i>	7 years
	<i>Bank deposits and statements</i>	7 years
	<i>Chart of accounts</i>	7 years
	<i>General ledgers and journals (includes bank reconciliations)</i>	7 years
	<i>Investment performance reports</i>	7 years
	<i>Equipment files and maintenance records</i>	7 years after disposition
	<i>Contracts and agreements</i>	7 years after all obligations end
<i>Correspondence — general</i>	3 years	
Insurance Records	<i>Policies — occurrence type</i>	Permanent
	<i>Policies — claims-made type</i>	Permanent
	<i>Accident reports</i>	7 years
	<i>Safety (OSHA) reports</i>	7 years

	<i>Claims (after settlement)</i>	7 years
	<i>Group disability records</i>	7 years after end of benefits
Real Estate	<i>Deeds</i>	Permanent
	<i>Leases (expired)</i>	7 years after all obligations end
	<i>Mortgages, security agreements</i>	7 years after all obligations end
Tax	<i>IRS Tax returns and related correspondence</i>	Permanent
	<i>IRS Form 1120s</i>	7 years
	<i>State Tax returns</i>	7 years
Human Resources	<i>Employee personnel files</i>	Permanent
	<i>Retirement plan benefits (plan descriptions, plan documents)</i>	Permanent
	<i>Employee handbooks</i>	Permanent
	<i>Workers comp claims (after settlement)</i>	7 years
	<i>Employee orientation and training materials</i>	7 years after use ends
	<i>Employment applications</i>	3 years
	<i>IRS Form I-9 (store separate from personnel file)</i>	Greater of 1 year after end of service, or three years
	<i>Withholding tax statements</i>	7 years
	<i>Timecards</i>	3 years
Technology	<i>Software licenses and support agreements</i>	7 years after all obligations end

II. Electronic Documents and Records

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Backup and recovery methods should be tested on a regular basis.

III. Emergency Planning

The Non-profit's records should be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping the Non-profit operating in an emergency should, if possible, be duplicated or backed up at least weekly and maintained off-site.

IV. Document Destruction

Documents should be eliminated at the end of the relevant retention period. Destruction of financial and personnel-related documents should be accomplished by shredding.

Document destruction with respect to relevant documents will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation or lawsuit.

V. Compliance

The Non-profit will periodically review these procedures with legal counsel or the Non-profit's certified public accountant to ensure that they are in compliance with new or revised regulations.

**GARDEN REMEDIES, INC
COMPENSATION SETTING POLICY**

I. Introduction

This policy codifies the procedures by which the board of directors of Garden Remedies, Inc. (the "Non-profit") sets the compensation of directors, top management officials, officers and key employees ("executive compensation"). These procedures are designed to comply with the "safe harbor" requirements set forth in the tax regulations on intermediate sanctions to create a rebuttable presumption of reasonableness in compensation levels.

II. Policy

The board of directors shall oversee the setting of executive compensation and shall (1) determine compensation of all directors, top management officials, officers and key employees, and (2) review, assess and approve the reasonableness of such compensation on a regular basis.

In order to be approved as reasonable, compensation must be an amount that would ordinarily be paid for comparable work by similarly situated organizations under like circumstances. The particular education, experience and skill of the compensated individual may also be taken into account.

III. Guidelines

Compensation determinations made by the directors will be made in accordance with the following guidelines:

- i. In setting and determining the reasonableness of executive compensation, the board shall obtain and rely upon compensation information for comparable work by similarly situated organizations under like circumstances, as defined in Section II above.
- ii. Board members involved in setting and approving executive compensation, as well as any third parties providing professional advice to the board members in connection with setting and approving executive compensation shall be independent and have no conflicts of interest as to the executive whose compensation is being reviewed. Board members shall have no conflict of interest for these purposes if they (i) will not economically benefit from the compensation arrangement, (ii) are not family members of a person who will economically benefit, (iii) have no material financial interest affected by the compensation arrangement, and (iv) are not family members of a person who has a material financial interest affected by the compensation arrangement.
- iii. Timely and accurate minutes of all final actions by the board regarding the setting and approval of executive compensation will be recorded and held with board records. Such minutes will include (1) the terms of the approved compensation arrangement and the date approved, (2) a list of the board members present during discussion, showing those who approved the arrangement, those who rejected it and those who recused themselves due to conflicts of interest, (3) the comparability data relied upon and how such data was obtained, and (4) the rationale for determining that the arrangement was reasonable if it exceeded the range of the comparability data.

**GARDEN REMEDIES, INC
COMPREHENSIVE INFORMATION SECURITY POLICY**

I. OBJECTIVE

It is the objective of JM Farm's Patient Group, Inc. ("Non-profit") in the development and implementation of this comprehensive information security program ("CISP") to create effective administrative, technical and physical safeguards for the protection of personal information, and to comply with obligations under 201 CMR 17.00. This CISP sets forth our procedure for evaluating our electronic and physical methods of accessing, collecting, storing, using, transmitting, and protecting personal information. For purposes of this CISP, "personal information" means an individual's first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such resident: (a) Social Security number; (b) driver's license number or state-issued identification card number; or (c) financial account number, or credit or debit card number, with or without any required security code, access code, personal identification number or password, that would permit access to an individual's financial account; provided, however, that "personal information" shall not include information that is lawfully obtained from publicly available information, or from federal, state or local government records lawfully made available to the general public. Non-profit generally acquires personal information in connection with hiring employees and payroll, and in connection with sales to the public.

II. PURPOSE

The purpose of the CISP is to:

- Ensure the security and confidentiality of personal information;
- Protect against any anticipated threats or hazards to the security or integrity of such information; and
- Protect against unauthorized access to or use of such information in a manner that creates a substantial risk of identity theft or fraud.

III. DATA SECURITY COORDINATOR

RMD appoints the Treasurer to be its Data Security Coordinator. The Data Security Coordinator will be responsible for:

- Initial implementation of the CISP;
- Regular testing of the CISP's safeguards;
- Evaluating the ability of each of Non-profit's third party service providers to implement and maintain appropriate security measures for the personal information to which Non-

profit permits them access, and requiring such third party service providers to implement and maintain appropriate security measures;

- Reviewing the scope of the security measures in the CISP at least annually, or whenever there is a material change in Non-profit's business practices that may implicate the security or integrity of records containing personal information; and
- Conducting an annual training session for all directors, officers, employees, volunteers and independent contractors, including temporary and contract employees who have access to personal information on the elements of the CISP.

IV. HANDLING PERSONAL INFORMATION

A. Paper Records

All paper records containing personal information shall be kept in a locked file cabinet with restricted access. Paper records will be destroyed regularly in accordance with Non-profit's document destruction policy using an office-grade shredder. Records containing personal information may not be taken out of the office and may be accessed only by personnel with a business necessity. Checks that need to be transported from the dispensary to the bank may be sent by US mail or hand delivered by the responsible employee, and if hand delivered, will not be left unattended at any point in the transition.

Checks. When Non-profit receives checks from members of the public, it will make only one hard copy and keep it in a locked file cabinet with restricted access. The checks themselves will also be kept under lock and key until they are deposited.

Paper employment records. Paper employment records must be kept under lock and key and accessed only by staff members responsible for employment issues and/or by the Executive Director.

Confidentiality. Information held about registered qualifying patients, personal caregivers, and dispensary agents is confidential and shall not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction, provided however, the Massachusetts Department of Public Health may access this information to carry out official duties.

B. Electronically Held Records

Non-profit requires the following security systems with respect to the maintenance of personal information on its computers:

Authentication Protocols. The Data Security Coordinator shall secure user authentication protocols including:

- Control of user IDs and other identifiers;
- A reasonably secure method of assigning and selecting passwords, or use of unique identifier technologies, such as biometrics or token devices;

- Control of data security passwords to ensure that such passwords are kept in a location and/or format that does not compromise the security of the data they protect;
- Restricting access to active users and active user accounts only; and
- Blocking access to user identification after multiple unsuccessful attempts to gain access.

Access Protocols. The Data Security Coordinator shall implement the following secure access control measures:

- Restrict access to records and files containing personal information to those who need such information to perform their job duties; and
- Assign unique identifications plus passwords, which are not vendor supplied default passwords, to each person with computer access, that is reasonably designed to maintain the integrity of the security of the access controls.

Restriction on E-mailing Personal Information. Non-profit will not, as a general rule, send or accept personal information by e-mail. To the extent exceptions must be made, the security measures described in this CISP shall be taken.

Encryption. Should any records and files containing personal information be transmitted across public networks or wirelessly, such records or files shall be encrypted. Personal information stored on laptops and other portable devices shall also be encrypted.

Monitoring. Non-profit shall take all steps necessary to reasonably monitor its computer network for unauthorized use of or access to personal information.

Firewalls. All files containing personal information on a system that is connected to the Internet shall be protected by a reasonably up-to-date firewall protection and operating system security patches designed to maintain the integrity of the personal information.

Virus protection. All computers containing personal information shall be protected by reasonably up-to-date versions of system security agent software, including malware protection and reasonably up-to-date patches and virus definitions, or a version of such software that can still be supported with up-to-date patches and virus definitions, and is set to receive the most current security updates on a regular basis.

Confidentiality. Information held about registered qualifying patients, personal caregivers, and dispensary agents is confidential and shall not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction, provided however, the Massachusetts Department of Public Health may access this information to carry out official duties.

C. Vendors

Non-profit routinely shares personal and financial information with its payroll service, its CPA firm, legal counsel, credit card vendors and Pay Pal. Non-profit requires each of these organizations to send written evidence, signed by an authorized person, confirming that they follow a security plan that fully complies with 201 CMR 17.

V. Training

The Data Security Coordinator shall ensure that all employees, whether full-time, part-time, seasonal or temporary, and independent contractors, consultants and volunteers who have access to personal information are trained on the data security requirements provided in this CISP.

VI. PERSONS SEPARATING FROM NON-PROFIT

All employees, whether full-time, part-time, seasonal or temporary, and independent contractors, consultants and volunteers upon termination or resignation shall immediately be denied access to physical and electronic records containing personal information and will be required to return or destroy all records and files containing personal information in any form that may at the time of such termination or resignation be in their possession or control, including all such information stored on laptops, portable devices, or other media, or in files, records, notes, or papers.

VII. SECURITY BREACH AND NOTIFICATION

All employees, whether full-time, part-time, seasonal or temporary, and independent contractors, consultants and volunteers, shall as soon as practicable and without unreasonable delay notify the Data Security Coordinator when such person knows or has reason to know of a security breach or when the person knows or has reason to know that personal information was acquired or used by an unauthorized person or used for an unauthorized purpose.

A "security breach" is any unauthorized acquisition or unauthorized use of unencrypted data or, encrypted electronic data and the confidential process or key that is capable of compromising the security, confidentiality, or integrity of personal information that creates a substantial risk of identity theft or fraud. A good faith but unauthorized acquisition of personal information by a person or agency, or employee or agent thereof, for lawful purposes, is not a breach of security unless the personal information is used in an unauthorized manner or subject to further unauthorized disclosure.

When the Data Security Coordinator is informed of a security breach, she will (1) notify the individual whose information was compromised, and (2) notify the Massachusetts Attorney General and the Office of Consumer Affairs and Business Regulation.

The notice to the individual will be in writing, possibly by electronic mail, and will include the following information:

- A general description of the incident;
- Identification of the personal information that may be at risk;
- A description of Non-profit's security program;
- A phone number to call within Non-profit for further information;
- Suggestion of extra caution, to review account statements, and to obtain a credit report;
and

- Phone numbers and addresses of the Federal Trade Commission, state agencies that may be of assistance, and major consumer reporting agencies. The notice will not be provided if law enforcement personnel advise against it.

The notice to the Office of Consumer Affairs and Business Regulation and to the Attorney General will include the following:

- A detailed description of the nature and circumstances of the breach of security;
- The number of people affected as of the time of notification;
- The steps already taken relative to the incident;
- Any steps intended to be taken relative to the incident subsequent to notification; and
- Information regarding whether law enforcement is engaged investigating the incident.

Non-Retaliation. Non-profit will not retaliate against anyone who reports a security breach or non-compliance with CISP, or who cooperates in an investigation regarding such breach or non-compliance. Any such retaliation will result in disciplinary action by the responsible parties up to and including suspension or termination.

Documentation. Non-profit shall document all responsive actions taken in connection with any incident involving a security breach.



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

mass.gov/dor

Letter ID: L0818727040
Notice Date: April 25, 2018
Case ID: 0-000-569-033



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



GARDEN REMEDIES INC
116 CHESTNUT HILL RD
CHESTNUT HILL MA 02467-1310

000005

Why did I receive this notice?

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

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

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

What if I have questions?

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

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau



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

William Francis Galvin
Secretary of the
Commonwealth

Date: April 11, 2018

To Whom It May Concern :

I hereby certify that according to the records of this office,
GARDEN REMEDIES, INC.

is a domestic corporation organized on **July 22, 2013**

I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 180 section 26 A, for revocation of the charter of said corporation; that the State Secretary has not received notice of dissolution of the corporation pursuant to Massachusetts General Laws, Chapter 180, Section 11, 11A, or 11B; 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.

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 18040256410

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

Processed by:



Compassionate Relief. Rooted in Medicine.

Dispensing Procedures

All products sold to customers will meet the requirements of 935 CMR 500.105(5)(a)-(d) addressing labeling of marijuana, marijuana products, edible marijuana infused products, marijuana concentrates and extracts and marijuana infused tinctures and topicals. Each label will include, but not be limited to: name and registration of marijuana cultivator and/or product manufacturer; the name of the product; quantity of usable marijuana; type of marijuana used in the product; directions for use of the marijuana if relevant; and a symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product.

In accordance with 935 CMR 500.101(2)(e)(8)(g), Garden Remedies, Inc. (GRI) is updating its dispensing procedures for its adult-use Marijuana Establishment that will be collocated within its existing RMD in the City of Newton. GRI agrees it will comply with all requirements of **935 CMR 500.140 regarding additional operational requirements for retail sales as stated in the following sections of 935 CMR 500.140:**

As a collocated adult use and medical use location, and pursuant to **935 CMR 500.140(3)**, upon entry into the premise of Garden Remedies, Inc. (“GRI”) by an individual, a GRI agent shall immediately inspect the individual’s proof of identification. An individual shall not be admitted to the premise unless the retailer has verified that the individual is 21 years of age or older by offering proof of identification. If the individual is younger than 21 but at least 18 years of age, he or she shall not be admitted unless they produce an active medical registration card issued by the CCC. If the person holds an active medical card but is younger than 18, they must be accompanied by a personal caregiver with an active medical registration card. Proof of identification is also required.

Pursuant to **935 CMR 500.140 (4)** GRI will comply with the regulations on Limitation on Sales. In accordance with M.G.L. c. 94G, § 7, as a Marijuana Retailer, GRI will not sell more than one ounce of marijuana or five grams of marijuana concentrate to a consumer per transaction.

Pursuant to **935 CMR 500.140 (5)**, GRI will comply with the regulations on Unauthorized Sales and Right to Refuse Sales.

- (a) As a Marijuana Retailer, GRI shall refuse to sell marijuana to any consumer who is unable to produce valid proof of identification.
- (b) As a retailer, GRI may refuse to sell marijuana products to a consumer if, in the opinion of the marijuana establishment agent based on the information available to the agent at that time, the consumer or the public would be placed at risk.
- (c) As a retailer, GRI shall not sell to an individual more than one ounce of marijuana or five

grams of marijuana concentrate per transaction.

(d) As a retailer, GRI is prohibited from selling marijuana products containing nicotine.

(e) As a retailer, GRI is prohibited from selling marijuana products containing alcohol, if sales of such alcohol would require licensure pursuant to M.G.L. c. 138.

Pursuant to **935 CMR 500.140 (6)**, GRI will comply with the regulations on Recording Sales.

(a) As a Marijuana Retailer, GRI shall only utilize a point-of-sale (POS) system approved by the Commission, in consultation with the DOR.

(b) As a retailer, GRI may utilize a sales recording module approved by the DOR.

(c) As a retailer, GRI is prohibited from utilizing software or other methods to manipulate or alter sales data.

(d) As a retailer, GRI shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. As a Marijuana Retailer, GRI shall maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If as a retailer, GRI determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:

1. it shall immediately disclose the information to the Commission;

2. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and

3. take such other action directed by the Commission to comply with 935 CMR 500.105.

(e) As a retailer, GRI shall comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding recordkeeping requirements.

(f) As a retailer, GRI shall adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.

(g) The Commission and the DOR may audit and examine the point-of-sale system used by GRI, as a retailer, in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000;

(h) As a retailer that is colocated with a medical marijuana treatment center, GRI shall maintain and provide to the Commission on a biannual basis accurate sales data collected by the licensee during the six months immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products under 935 CMR 500.140(10).

A separate point of sale system will be in place for patients (non-taxed) and adult use patrons (taxed). Pursuant to **935 CMR 500.140(7)** As a Marijuana Retailer that is colocated with a RMD, GRI shall provide for physical separation between medical and adult-use sales areas. Separation will be provided by a temporary or semi- permanent physical barrier, such as a stanchion, that, in the opinion of the Commission, adequately separates sales areas of marijuana products for medical use from sales areas of marijuana products for adult use. GRI shall provide for separate lines for sales of marijuana products for medical use from marijuana products for adult use within the sales area, provided, however, that the holder of a medical registration card may use either line and shall not be limited only to the medical use line. GRI will provide an area that is separate from the sales floor to allow for confidential consultation. (See 935 CMR 500.140 (7), Physical Separation of Marijuana and Marijuana Products for Medical or Adult Use).

Pursuant to **935 CMR 500.140 (8)**, GRI will comply with the regulations on Consumer Education. As a Marijuana Retailer, GRI shall make available educational materials about marijuana products to consumers. As a retailer, GRI must have an adequate supply of current educational material available for distribution. Educational materials must be available in commonly spoken languages designated by the Commission, which will include, but not be limited to appropriate materials for the visually- and hearing-impaired. Such materials shall be made available for inspection by the Commission upon request. The Commission will establish fines or other civil penalties for a Marijuana Establishment's failure to provide these materials. The educational material must include at least the following: (a) A warning that marijuana has not been analyzed or approved by the FDA, that there is limited information on side effects, that there may be health risks associated with using marijuana, and that it should be kept away from children; (b) A warning that when under the influence of marijuana, driving is prohibited by M.G.L. c. 90, § 24, and machinery should not be operated; (c) Information to assist in the selection of marijuana, describing the potential differing effects of various strains of marijuana, as well as various forms and routes of administration; (d) Materials offered to consumers to enable them to track the strains used and their associated effects; (e) Information describing proper dosage and titration for different routes of administration. Emphasis shall be on using the smallest amount possible to achieve the desired effect. The impact of potency must also be explained; (f) A discussion of tolerance, dependence, and withdrawal; (g) Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs; (h) A statement that consumers may not sell marijuana to any other individual; (i) Information regarding penalties for possession or distribution of marijuana in violation of Massachusetts law; and (j) Any other information required by the Commission.

Pursuant to **935 CMR 500.140 (9)**, GRI will comply with the regulations on Testing. GRI understands and will comply with regulations that state that "No marijuana product, including marijuana, may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. GRI will not dispense any marijuana product that has not been tested by an Independent Testing Laboratory and deemed to comply with the acceptable standards required under 935 CMR 500.160.

Pursuant to **935 CMR 500.140(10)**, **GRI will comply with the regulations on Patient Supply.** GRI will maintain a 35% patient supply reserve of the RMD's marijuana products, exclusively for patients registered under 935 CMR 501.000 if the retail location is licensed prior to GRI receiving its adult-use cultivation and processing and manufacturing license from the Commission.

GARDEN REMEDIES



Diversity Plan

I. Intent

It is Garden Remedies, Inc.'s ("GRI") policy to provide equal opportunity in all areas of employment, including recruitment, hiring, training and development, promotions, transfers, termination, layoff, compensation, benefits, social and recreational programs, and all other conditions and privileges of employment, in accordance with applicable federal, state, and local laws. GRI will make reasonable accommodations for qualified individuals with known disabilities, in accordance with applicable law.

We are dedicated to attracting and supporting a diverse faculty and staff population and enhanced multicultural learning opportunities. We value the opportunity to work, learn, and develop in a community that embraces the diversity of individuals and ideas, including race, ethnicity, religion, spiritual beliefs, national origin, age, gender, marital status, sexual orientation, physical ability, political affiliation, and intellectual perspective.

II. Purpose

- A. Review all policies, programs, and offices of Garden Remedies, Inc. in an effort to:
 - a. promote and maintain a diverse faculty, and staff population and foster an environment of inclusion and diversity;
 - b. develop and present to the Board of Directors and the President/CEO plans and recommendations to increase diversity, including but not limited to, staffing, budget recommendations, and program changes, if any, and recommendations concerning language to be included in GRI's advertisements, and other materials on the subject of diversity;
 - c. prepare and file with the Board of Directors and the President/CEO, an annual report on diversity initiatives with such recommendations as the committee may deem necessary and advisable; and
 - d. undertake such other activities, studies or initiatives GRI may, from time-to-time, deem necessary or advisable, as well as conduct any other matters within GRI as may be requested by the Board of Directors.

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- e. develop a method to track the diversity of new hires and past hires. Take a strategic approach aiming at results over the long-term. Track hires on an on-going basis. If diverse applicants are represented in the applicant pool, being interviewed, and hired into professional level positions.

III. Goals

A. GRI actively pursues and seeks to retain a diversified faculty, and staff members;

- a. Creating as safe, accepting and respectful work environment.
- b. Management being primarily responsible for seeing that equal employment opportunity policies are implemented.
- c. Having all members of the staff share the responsibilities for ensuring the policies are effective and apply uniformly to everyone.
- d. Provide everyone with the tools and opportunity to succeed and level up within GRI regardless of gender, race or disabilities.
- e. Each employee is required to have at least 8 hours of training per year based on their positions.
- f. A record shall be kept of all progress and efforts that were made to achieve said goals.

B. GRI strives to maintain a work environment that is free from discrimination, intimidation, hostility, or other offenses that might interfere with work performance. We will not tolerate any unlawful harassment of employees by anyone.

- a. Employees are encouraged to file any and all complaints with Human Resource confidentially and without fear of retaliation.
- b. All grievances filed shall be recorded and kept in a confidential location and can be only accessed by the Legal Department and Human Resources.

IV. Programs and Measurements

GRI is committed to recruit and hire a diverse group of employees while promoting equity and equality among all staff. To achieve this, GRI will:

- a. Make reasonable accommodations for qualified individuals with known disabilities, in accordance with applicable law. While not a complete list, general examples of

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- accommodation may include workstation modifications, extended break times when needed for mobility issues, and any other reasonable accommodation that may be required.
- b. Have a full day training session once a year for all senior management to address bias and cultural sensitivity to enable upper management to understand the lives and interest of current and potential employees.
 - c. Engage in the community for recruiting new employees. This is accomplished by partnering with municipal agencies including Mayor's offices, Chambers of Commerce, Memorial Halls, and any other local agencies that assist with job placement. Fliers are posted in common areas and ads are placed in local newspapers. When staffing levels require, we host job fairs within the community.
 - d. Abide by all terms included in the Community Host Agreement.
 - e. Acknowledge and respond appropriately and effectively to incidents of discrimination.
 - f. A monthly town hall will be held to enable employees to learn about the cultural backgrounds, lives and interests of other employees and customers outside of the workplace.
 - g. Recognize and acknowledge special holidays or events.
 - h. Permitting flexible schedules so that employees who observe religious practices can arrange their schedules around their beliefs.
 - i. Acknowledge all faiths present in the workplace.
 - j. A yearly Human Resource audit to determine if the current efforts to employ a diverse employee roster is working. This is accomplished by surveying the workforce and comparing our diversity makeup against MA census data. As an example, 2018 census data showed the MA workforce was 9% Hispanic or Latino and Garden Remedies workforce was 8% Hispanic or Latino. This process will be specified by worksite during Q1 2020 using 2019 data to ensure our diversity makeup closely mirrors the locally available workforce.
 - k. When asked by the CCC, the Head of Human Resources shall provide detailed documentation of all efforts put forth to gain and maintain a diverse working environment. Said documentation shall be made available to the CCC within a reasonable timeframe upon request.
 - l. GRI annually assesses and evaluates the status and accomplishments of the implementation of our goals by:
 - i. Evaluating employee attrition rates and reviewing exit interview data to identify any trends or opportunity areas.
 - ii. Ensuring workforce satisfaction via confidential annual employee survey.

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- iii. Annual diversity study comparing GRI diversity makeup against MA census data.
- iv. Open door policies and practices, encouraging open dialogue and fostering communication from all employees.
- m. Garden Remedies, Inc. acknowledges and is aware, and will adhere to, the requirements set forth on 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 the applicant will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

V. Inclusion

- A. Diversity Training – GRI has a yearly inclusive diversity training for employees to encompass the following:
 - i. Understanding diversity and its definition
 - ii. Standards for working with and serving people from diverse populations
 - iii. Skills and strategies for dealing with interpersonal conflicts and addressing differences
 - iv. Applicable federal and state laws
 - v. Remedies available to victims of discrimination and hate crimes
 - vi. Understanding their rights, responsibilities and obligations
 - vii. Identifying bias and barriers for diverse applicants in the hiring process
 - viii. Once identified, work to educate all employees involved in the hiring process on the appearance of those biases and barriers in the recruiting, interviewing, and hiring process. Begin a process to make the changes necessary to eliminate those barriers



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Garden Remedies, Inc. Maintaining of Financial Records

Garden Remedies Inc.'s ("GRI") 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.

Following the closure of GRI, all records will be kept for at least two years at the expense of GRI 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).



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Personnel Policies

It is Garden Remedies, Inc.'s ("GRI") policy to provide equal opportunity in all areas of employment, including recruitment, hiring, training and development, promotions, transfers, termination, layoff, compensation, benefits, social and recreational programs, and all other conditions and privileges of employment, in accordance with applicable federal, state, and local laws. GRI will make reasonable accommodations for qualified individuals with known disabilities, in accordance with applicable law. In accordance with 935 CMR 500.101(2)(e)(8)(h), Garden Remedies, Inc. (GRI) is updating and modifying its personnel policies, including background check policies, for its adult-use Marijuana Establishments that will be colocated within its existing RMD cultivation and processing sites in the City of Fitchburg and its retail dispensary in the City of Newton.

Management is primarily responsible for seeing that equal employment opportunity policies are implemented, but all members of the staff share the responsibility for ensuring that, by their personal actions, the policies are effective and apply uniformly to everyone. Any employee, including managers, determined by GRI to be involved in discriminatory practices are subject to disciplinary action and may be terminated. GRI strives to maintain a work environment that is free from discrimination, intimidation, hostility, or other offenses that might interfere with work performance. In keeping with this desire, we will not tolerate any unlawful harassment of employees by anyone, including any manager, co-worker, vendor or clients.

In accordance with 935 CMR 500.105 (1), General Operational Requirements for Marijuana Establishments, Written Operating Procedures, as a Marijuana Establishment, GRI has and follows a set of detailed written operating procedures for each location. GRI has developed and will follow a set of such operating procedures for each facility. GRI's operating procedures include, but need not be limited to the following:

- (a) Security measures in compliance with 935 CMR 500.110;
- (b) Employee security policies, including personal safety and crime prevention techniques;
- (c) A description of the Marijuana Establishment's hours of operation and after-hours contact information, which shall be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
- (d) Storage of marijuana in compliance with 935 CMR 500.105(11);
- (e) Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
- (f) Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
- (g) Plans for quality control, including product testing for contaminants in compliance with 935

CMR 500.160;

(h) A staffing plan and staffing records in compliance with 935 CMR 500.105(9);

(i) Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;

(j) Alcohol, smoke, and drug-free workplace policies;

(k) A plan describing how confidential information will be maintained;

(l) A policy for the immediate dismissal of any marijuana establishment agent who has:

1. Diverted marijuana, which shall be reported to law enforcement officials and to the Commission; 2. Engaged in unsafe practices with regard to operation of the Marijuana Establishment, which shall be reported to the Commission; or

3. Been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.

(m) A list of all board members and executives of a Marijuana Establishment, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR 500.105(1)(m) requirement may be fulfilled by placing this information on the Marijuana Establishment's website. (n) Policies and procedures for the handling of cash on Marijuana Establishment premises including but not limited to storage, collection frequency, and transport to financial institution(s).

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

(p) Policies and procedures for energy efficiency and conservation that shall include:

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

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

3. Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and

4. Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants.

In accordance with 935 CMR 500.105(2), all current owners, managers and employees of GRI that are involved in the handling and sale of marijuana will successfully complete Responsible Vendor Training Program, and once designated a "responsible vendor" require all new employees involved in handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually and those not selling or handling marijuana may participate voluntarily. GRI will maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussion concerning marijuana effect on the human body; diversion prevention; compliance with tracking requirements; identifying acceptable forms of ID, including medical patient cards; and key state and local laws.

All GRI employees will be duly registered as marijuana establishment agents and have to complete a background check in accordance with 935 CMR 500.030(1). All marijuana establishment agents will complete a training course administered by GRI and complete a Responsible Vendor Program in compliance with 935 CMR 500.105(2)(b). Employees will be required to receive a minimum of eight hours of on-going training annually pursuant to 935 CMR 500.105(2)(a).

In accordance with 935 CMR 500.105 (9), General Operational Requirements for Marijuana Establishments, Record Keeping, GRI's personnel records will be available for inspection by the Commission, upon request. GRI's records will be maintained in accordance with generally accepted accounting principles. Written records that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the following:

(d) The following personnel records of GRI:

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

(g) Following closure of a Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission. GRI understands that in the event that GRI were to close, all records will be kept for at least two years at the expense of GRI.



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Garden Remedies, Inc. Qualifications and Training

Pursuant to 935 CMR 500.105(2)(a) Garden Remedies, Inc. (“GRI”) will ensure all dispensary agents complete training prior to performing job functions. Training will be tailored to the role and responsibilities of the job function. Dispensary agents will be trained for one week before acting as a dispensary agent. At a minimum, staff shall receive eight hours of on-going training annually. New dispensary agents will receive employee orientation prior to beginning work with GRI. Each department managed will provide orientation for dispensary agents assigned to their department. Orientation will include a summary overview of all the training modules.

In accordance with 935 CMR 500.105(2), all current owners, managers and employees of GRI that are involved in the handling and sale of marijuana will successfully complete Responsible Vendor Training Program, and once designated a “responsible vendor” require all new employees involved in handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually and those not selling or handling marijuana may participate voluntarily. GRI will maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussion concerning marijuana effect on the human body; diversion prevention; compliance with tracking requirements; identifying acceptable forms of ID, including medical patient cards; and key state and local laws.

All employees will be registered as agents, in accordance with 935 CMR 500.030. All GRI employees will be duly registered as marijuana establishment agents and have to complete a background check in accordance with 935 CMR 500.030(1). All registered agents of GRI shall meet suitability standards of 935 CMR 500.800.

Training will be recorded and retained in dispensary agents file. Training records will be retrained by GRI for at least one year after agents’ termination. Dispensary agents will have continuous quality training and a minimum of 8 hours annual on-going training.



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Garden Remedies, Inc. Quality Control and Testing of Product

Pursuant to 935 CMR 500.160, Garden Remedies, Inc. (“GRI”) will not sell or market any marijuana product that is not capable of being tested by Independent Testing Laboratories, including testing of marijuana products and environmental media. GRI will implement a written policy for responding to laboratory results that indicate contaminant levels that are above acceptable levels established in DPH protocols identified in 935 CMR 500.160(1) and subsequent notification to the Commission of such results. Results of any tests will be maintained by GRI for at least one year. All transportation of marijuana to or from testing facilities shall comply with 935 CMR 500.105(13) and any marijuana product returned to GRI by the testing facility will be disposed of in accordance with 935 CMR 500.105(12). GRI will never sell or market adult use marijuana products that have not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

In accordance with 935 CMR 500.130(2), GRI will prepare, handle and store all edible marijuana products in compliance with the sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food, and with the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements. In addition, GRI’s policies include requirements for handling of marijuana, pursuant to 935 CMR 500.105(3), including sanitary measures that include, but are not limited to: hand washing stations; sufficient space for storage of materials; removal of waste; clean floors, walls and ceilings; sanitary building fixtures; sufficient water supply and plumbing; and storage facilities that prevent contamination.

Pursuant to 935 CMR 500.105(11)(a)-(e), Garden Remedies, Inc. (“GRI”) will provide adequate lighting, ventilation, temperature, humidity, space and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110. GRI will have a separate area for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, unless such products are destroyed. GRI storage areas will be kept in a clean and orderly condition, free from infestations by insects, rodents, birds and any other type of pest. The GRI storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.

Garden Remedies, Inc. (“GRI”) has a Quality Manager who will oversee the manufacturing at the GRI facility to maintain strict compliance with DPH regulations and protocols for quality control and analytical testing. In accordance with 935 CMR 500.160 GRI grow areas are monitored for temperature, humidity, and CO2 levels this monitoring helps reduce the risk of crop failure. Ethical pest management procedures are utilized to naturally maintain a pest free environment alongside our True Living Organics (“TLO”) growing method.

All Marijuana Infused Products (“MIPs”) are produced using good manufacturing practices and safe practices for food handling to ensure quality and prevention of contamination.

Our quality assurance manager will ensure all batches of Marijuana and MIPs will be tested, by an Independent Testing Laboratory pursuant to 935 CMR 500.160. All products shall be tested for the cannabinoid profile and for contaminants as specified by the Department, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides.

Environmental media will be tested in compliance with the Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries published by the Department of Public Health pursuant to 935 CMR 500.160(1). All testing results will be maintained by GRI for no less than one year in accordance with 935 CMR 500.160(3).

Samples that pass testing will be packaged for use or utilized in MIPs.

Samples that fail testing will be reported and destroyed. Pursuant to 935 CMR 500.160(9), no marijuana product shall be sold or marketed for sale that has not first been tested and deemed to comply with the Independent Testing Laboratory standards.



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Garden Remedies, Inc. Record Keeping Procedures

Garden Remedies, Inc.'s (GRI) records will be available to the Cannabis Control Commission ("CCC") upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection, in addition to written operating procedures as required by 935 CMR 500.105(1), inventory records as required by 935 CMR 500.105(8) and seed-to-sale tracking records for all marijuana products are required by 935 CMR 500.105(8)(e).

Personnel records will also be maintained, in accordance with 935 CMR 500.105(9)(d), including but not limited to, job descriptions for each employee, organizational charts, staffing plans, personnel policies and procedures and background checks obtained in accordance with 935 CMR 500.030. Personnel records will be maintained for at least 12 months after termination of the individual's affiliation with GRI, in accordance with 935 CMR 500.105(9)(d)(2). Additionally, business will be maintained in accordance with 935 CMR 500.104(9)(e) as well as waste disposal records pursuant to 935 CMR 500.104(9)(f), as required under 935 CMR 500.105(12).

Following the closure of the Marijuana Establishment, all records will be kept for at least two years at the expense of GRI and in a form and location acceptable to the Commission, pursuant to 935 CMR 500.105(9)(g).



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Garden Remedies, Inc. Restricting Access to Age 21 or Older

As a co-located adult use and medical use location, and pursuant to 935 CMR 500.140(3), upon entry into the premise of Garden Remedies, Inc. (GRI) by an individual, a GRI agent shall immediately inspect the individual's proof of identification. An individual shall not be admitted to the premise unless the retailer has verified that the individual is 21 years of age or older by offering proof of identification. If the individual is younger than 21 but at least 18 years of age, he or she shall not be admitted unless they produce an active medical registration card issued by the DPH. If the person holds an active medical card but is younger than 18, they must be accompanied by a personal caregiver with an active medical registration card. Proof of identification will also be required of personal caregivers.



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Garden Remedies, Inc. Separating Recreational from Medical Operations

Prior to receiving an adult-use cultivation and processing and manufacturing license from the Commission, and pursuant to 935 CMR 500.105(8), Garden Remedies Inc. (“GRI”) will obtain marijuana and marijuana products from its cultivation and processing facility in Fitchburg, Massachusetts, which has been licensed as an RMD by the Commission and is compliant with all applicable laws and regulations pursuant to 935 CMR 501.000. GRI will sell marijuana products in its possession when it receives approval from the Commission to commence sales, pursuant to 935 CMR 500.105(8) and subject to the patient supply reserve in 935 CMR 500.140(10). As GRI will be cultivating, processing and selling marijuana products for both medical use and for adult use, GRI will create virtual separation of the products, pursuant to 935 CMR 500.105(8)(g). At the point of sale, GRI will designate whether the marijuana products are intended for sale for adult use or medical use through tracking methodology approved by the Commission under 935 CMR 500.000.

As a co-located adult use and medical use location, and pursuant to 935 CMR 500.140(3), upon entry of GRI premises by an individual, a GRI agent shall immediately inspect the individual’s proof of identification. An individual shall not be admitted to the premise unless the retailer has verified that the individual is 21 years of age or older by offering proof of identification. If the individual is younger than 21 but at least 18 years of age, he or she shall not be admitted unless they produce an active medical registration card issued by the CCC. If the person holds an active medical card but is younger than 18, they must be accompanied by a personal caregiver with an active medical registration card. Proof of identification is also required.

A separate point of sale system will be in place for patients (non-taxed) and adult use patrons (taxed). Pursuant to 935 CMR 500.140(7) GRI shall provide for physical separation between medical and adult use sales areas. Separation will be provided by a temporary or semi- permanent physical barrier, such as a stanchion, that, in the opinion of the Commission, adequately separates sales areas of marijuana products for medical use from sales areas of marijuana products for adult use. GRI shall provide for separate lines for sales of marijuana products for medical use from marijuana products for adult use within the sales area, provided, however, that the holder of a medical registration

card may use either line and shall not be limited only to the medical use line. GRI will provide an area that is separate from the sales floor to allow for confidential consultation.

GRI will ensure access to a sufficient quantity and variety of marijuana products, including marijuana, for patients registered under 105 CMR 725.000, and pursuant to 935 CMR 500.140(10).



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Plan for Positive Impact

Garden Remedies, Inc. (GRI) recognizes that cannabis prohibition has had a disproportionate impact on various communities and will adhere to a plan to positively impact areas of disproportionate impact, as defined by the Commission. (See *935 CMR 500.101(2)(b)(10)*). As the industry begins in earnest in Massachusetts, it is fully recognized that GRI has a responsibility to ensure it is contributing to its community. GRI's cultivation site and processing center are located in Fitchburg, MA. Fitchburg, Massachusetts has been identified by the Cannabis Control Commission (CCC) as an area that has been disproportionately impacted by cannabis prohibition. GRI currently employs many Fitchburg residents at the medical marijuana cultivation site and processing center, and GRI has committed to providing even more jobs to Fitchburg residents upon receiving its licensure for adult use cultivation and adult use processing from the Cannabis Control Commission (CCC). GRI and its management team is fully committed to ensuring it is maintaining this positive contribution to the City of Fitchburg.

As stated in the Community Host Agreement, GRI plans to ensure that it creates a positive and lasting impact on the Fitchburg community of which it will be a part. GRI is committed to ensuring that it continues to foster positive relationships with the City of Fitchburg's elected officials such as the Mayor, his staff, the City Council and the city employees and members of the Planning Board. GRI has promised the City of Fitchburg that it will fund a Community Relations Board whose purpose will be to determine how each gift or grant of funds, goods and/or services will be donated to a specific local charity or to contribute to a community's specific need.

GRI is committed to serving communities and people living in areas considered to be of 'disproportionate impact' by the CCC in both Fitchburg and throughout the Commonwealth of Massachusetts. GRI plans to achieve its goals of serving individuals who have been negatively impacted in a disproportionate manner by cannabis prohibition through the implementation of its 'Catalyst Mentoring Program' and participating in various job fairs and events within the cannabis industry such as interviewing applicants for cannabis jobs at the MassCBA Job Fair in Roxbury and speaking on the 'Women in Cannabis' panel at Boston CannaCon.

GRI is launching its 'Catalyst Mentoring Program' to equip newcomers with the skills and knowledge they need to succeed in the fast-evolving and complex cannabis industry. The program is designed to mentor participants who have been approved as Economic Empowerment priority applicants by the Massachusetts Cannabis Control Commission. The mentoring program aims to ensure diversity in the new cannabis market. Catalyst begins with an orientation class and tour on October 15 at Garden Remedies' state-of-art cultivation and processing facility in Fitchburg, MA.

The Catalyst Mentoring Program is a natural extension of Garden Remedies' focus on educating patients and the public at large about the many benefits of the natural medicine and increasing access to safe, pure and regulated cannabis products.

The 14-week GRI Catalyst Mentoring Program will have a series of in-person and virtual learning experiences and mentoring sessions aimed at addressing the unique business challenges and opportunities in the cannabis industry. Along the way, participants will be paired with Garden Remedies mentors to offer fresh perspectives and one-on-one feedback. Each class will have access to three learning tracks: processing, cultivation or retail—with access to the knowledge in our high-tech lab, kitchen, cultivation facility or retail dispensary.

There is no fee to participate in this program. Interested participants can learn more and apply at <http://bit.ly/GRICatalyst> or visit Garden Remedies' booth at the 2018 Boston Freedom Rally at the Historic Boston Common on September 14, 15 and 16. Applications are due September 28.

GRI will also continue to participate in education workshops with the Cannabis Society and Elevate Northeast to promote community engagement with a specific focus on engaging diverse populations such as women, various minority groups, and persons with disabilities.

GRI will conduct continuous and regular evaluations of the implementations of these goals to have a positive impact on communities impacted disproportionately by cannabis prohibition. GRI will evaluate the success of its positive impact plan within its quarterly reports.