



Massachusetts Cannabis Control Commission

Public Record Request

Marijuana Retailer

General Information:

License Number: MR281269
Original Issued Date: 02/05/2020
Issued Date: 02/05/2020
Expiration Date: 02/05/2021
Payment Received: \$5000 Payment Required: \$5000

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: New Dia, LLC Federal Tax Identification Number EIN/TIN: [REDACTED]
Phone Number: 617-763-5159 Email Address: ross@newdia.co
Business Address 1: 118 Cambridge St Business Address 2:
Business City: Worcester Business State: MA Business Zip Code: 01603
Mailing Address 1: 8 Zoar St Mailing Address 2:
Mailing City: Worcester Mailing State: MA Mailing Zip Code: 01604

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: yes
Priority Applicant Type: Economic Empowerment Priority
Economic Empowerment Applicant Certification Number: EEA201826
RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:
Department of Public Health RMD Registration Number:
Operational and Registration Status:
To your knowledge, is the existing RMD certificate of registration in good standing?:
If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 93

Percentage Of Control:

100

Role: Owner / Partner

Other Role:

First Name: Ross

Middle Name:

Last Name: Bradshaw

Suffix:

Gender: Male

User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French), Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

Percentage Of Ownership: 2

Percentage Of Control:

Role: Owner / Partner

Other Role:

First Name: Amanda

Middle Name:

Last Name: Bradshaw

Suffix:

Gender: Female

User Defined Gender:

What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali), White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 2.5

Percentage Of Control:

Role: Owner / Partner

Other Role:

First Name: Shanel

Middle Name:

Last Name: Lindsay

Suffix:

Gender: Female

User Defined Gender:

What is this person's race or ethnicity?: Black or African American (of African Descent, African American, Nigerian, Jamaican, Ethiopian, Haitian, Somali), White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: 2.5

Percentage Of Control:

Role: Owner / Partner

Other Role:

First Name: Susan

Middle Name:

Last Name: Lindsay

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:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: Susan

Middle Name:

Last Name: Lindsay

Suffix:

Types of Capital: Monetary/Equity

Other Type of Capital:

Total Value of the Capital Provided: \$100000

Percentage of Initial Capital: 67

Capital Attestation: Yes

Individual Contributing Capital 2

First Name: Shanel Middle Name: Last Name: Lindsay Suffix:
Types of Capital: Monetary/Equity Other Type of Capital: Total Value of the Capital Provided: \$50000 Percentage of Initial Capital: 33
Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 118 Cambridge Street
Establishment Address 2:
Establishment City: Worcester Establishment Zip Code: 01603
Approximate square footage of the establishment: 4000 How many abutters does this property have?: 41
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
Certification of Host Community Agreement	Certification of community host agreement .pdf	pdf	5d4ae003ba408534125097a6	08/07/2019
Community Outreach Meeting Documentation	Community Outreach Meeting Documentation - 9.8.19.pdf	pdf	5d7fa5283567ed1db89e3644	09/16/2019
Plan to Remain Compliant with Local Zoning	Plan to remain compliant with local zoning - 9.8.19.pdf	pdf	5d7fa59d8906c11df69cb9e4	09/16/2019

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Positive Impact Plan - 9.8.19.pdf	pdf	5d7fa70e816d7b225d15aa6c	09/16/2019

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner **Other Role:**
First Name: Ross **Middle Name:** **Last Name:** Bradshaw **Suffix:**
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 2

Role: Owner / Partner **Other Role:**
First Name: Amanda **Middle Name:** **Last Name:** Bradshaw **Suffix:**
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 3

Role: Owner / Partner **Other Role:**
First Name: Shanel **Middle Name:** **Last Name:** Lindsay **Suffix:**
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 4

Role: Owner / Partner **Other Role:**
First Name: Susan **Middle Name:** **Last Name:** Lindsay **Suffix:**
RMD Association: Not associated with an RMD
Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Bylaws	Company Bylaws.pdf	pdf	5b7e0e9d89bc002d9918aa2e	08/22/2018
Department of Revenue - Certificate of Good standing	Certificate of Good Standing - Department of Revenue.pdf	pdf	5d4b484d17ec6d33f1153820	08/07/2019
Articles of Organization	Articles of Organization .pdf	pdf	5d4b4ff1b0555e33d0bcf1c2	08/07/2019
Secretary of Commonwealth - Certificate of Good Standing	SOS COGS.pdf	pdf	5d5b5523d4b61e1ddc08a3dd	08/19/2019

No documents uploaded

Massachusetts Business Identification Number: 001331653
Doing-Business-As Name: New Dia, LLC
DBA Registration City: Worcester

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for Liability Insurance	Plan for Obtaining Liability Insurance.pdf	pdf	5b7e129d8d67cc394b81ba1c	08/22/2018
Proposed Timeline	Proposed Timeline.pdf	pdf	5d5c301d0473c3226f3596a2	08/20/2019
Business Plan	CCC Business Plan - New Dia, LLC.pdf	pdf	5d652e048906c11df69c86d0	08/27/2019

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	Plan for obtaining marijuana or marijuana products.pdf	pdf	5b7e14fb03a477392d0a3080	08/22/2018
Restricting Access to age 21 and older	Restricting Access to age 21 and older.pdf	pdf	5b7e15b28d67cc394b81ba28	08/22/2018
Prevention of diversion	Prevention of diversion.pdf	pdf	5b7e174faa953e3937b5a09e	08/22/2018
Storage of marijuana	Storage of marijuana.pdf	pdf	5b7e17f83f9f81395f135b6a	08/22/2018
Record Keeping procedures	Record keeping procedures.pdf	pdf	5b7e1c395a6f093923e4fe7f	08/22/2018
Security plan	Security Plan - 9.8.19.pdf	pdf	5d7faa0d7e918b22a66c13b4	09/16/2019
Transportation of marijuana	Transportation of marijuana - 9.8.19.pdf	pdf	5d7faaee271f0d1dcacaf32e6d	09/16/2019
Inventory procedures	Inventory procedures - 9.8.19.pdf	pdf	5d7fabe138be9e227ac54f5f	09/16/2019
Quality control and testing	Quality control and testing - 9.8.19.pdf	pdf	5d7fac83dfdeea2264a65f6b	09/16/2019
Dispensing procedures	Dispensing procedures - 9.8.19.pdf	pdf	5d7fad408906c11df69cba1c	09/16/2019
Personnel policies including background checks	Personnel policies including background checks - 9.8.19.pdf	pdf	5d7fadd8906c11df69cba22	09/16/2019
Maintaining of financial records	Maintenance of financial records - 9.8.19.pdf	pdf	5d7fae77dfdeea2264a65f7b	09/16/2019
Qualifications and training	Qualifications and training - 9.8.19.pdf	pdf	5d7faf18dfdeea2264a65f83	09/16/2019
Diversity plan	Diversity Plan - 1.3.20.pdf	pdf	5e0f6099cb8cc6573ebd26c3	01/03/2020

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

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

Notification: I Understand

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 10:00 AM	Monday To: 10:00 PM
Tuesday From: 10:00 AM	Tuesday To: 10:00 PM
Wednesday From: 10:00 AM	Wednesday To: 10:00 PM
Thursday From: 10:00 AM	Thursday To: 10:00 PM
Friday From: 10:00 AM	Friday To: 10:00 PM
Saturday From: 10:00 AM	Saturday To: 10:00 PM
Sunday From: 10:00 AM	Sunday To: 7:00 PM



NEW DIA

RETAIL MARIJUANA
ESTABLISHMENT

CONTACT: ROSS BRADSHAW
PHONE: 617-834-5086
EMAIL: ROSS@NEWDIA.CO

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1.0 EXECUTIVE SUMMARY

New Día is applying as an Equity Empowerment applicant for an adult use marijuana retail license in Worcester, Massachusetts. New Día is specifically focused on minority ownership, employment, and empowerment while providing Worcester’s most harmed communities with safe, affordable, marijuana products, in an inspiring, wellness-oriented setting. We will provide employment and career training in retail management, human resources, and finance to community members who are at least 21 years of age and/or have a marijuana-related Cori. New Día will provide lab-tested cannabis in the form of flowers, balms, liquid tinctures, edibles, and salves. Through our diversity initiatives, our goal is for community members to receive complimentary educational training and workshops on developing relevant skills for ownership and employment within the marijuana industry. In addition, New Día is committed to providing free assistance and education to other prospective minority applicants who wish to start their own marijuana-related businesses in compliance with state and local laws.

“DIVERSITY – IN – ACTION”

We will be an exceptional minority-owned business, neighbor, and the benchmark for inclusion and diversity within the marijuana industry here in Massachusetts. Our vision, “Diversity in Action” reaches well beyond being a marijuana retailer. Our diversity-centered philosophy represents doing business in a responsible, ethical, and intentional way that provides opportunity to communities and people who have been disproportionately harmed by the war on drugs. Our vision relies on our skilled team and network of trusted partners who demonstrate integrity, professionalism, and inclusion, allowing us to provide excellence to our customers and to our communities.

1.1. HISTORY

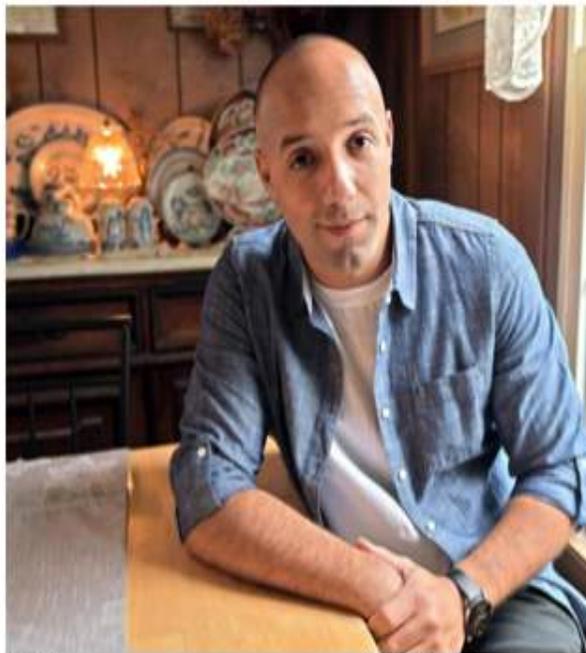
The mission and ideals of New Día are not concepts or fads that have developed overnight. Our values centering around “Marijuana”, “Diversity”, “Empowerment”, “Opportunity”, and “Social Justice” were not conceived in the current landscape of popular marijuana buzz words or hollow phrases. The roots of New Día and our principles of equity, ownership, and minority representation within this new era of legal marijuana date back to 2012 with the work of our Founder and CEO, Ross Bradshaw. In 2012 after medical marijuana was legalized in the Commonwealth, Ross became a vocal advocate and entrepreneur for marijuana rights and the overall need to reform Massachusetts unjust marijuana laws which were disproportionately enforced in minority communities. Ross’ dedication to reforming Massachusetts marijuana laws combined with his business acumen as a CPA, lead to his appointment as the Treasurer of Massachusetts chapter of the National Organization for the Reform of Marijuana Laws (NORML) from 2013 to 2015.

As early as 2014, Ross, along with other state advocates, began to address their attention to the glaring absence of minority ownership within the state Medical Marijuana program and the potential implications of a continued pattern if marijuana were to become fully legalized in the Commonwealth.

Ross later went on to become a volunteer for the “Yes on 4” campaign in 2016, recruiting and educating the public about the marijuana ballot initiative and the potential for economic development within minority communities.

In 2017, Ross continued his fight for minority representation and communities harmed by prohibition as a board of director for Equitable Opportunities Now (EON), a Massachusetts non-profit dedicated to ensuring just representation, equity, and opportunity for people of color within the cannabis industry. EON was recently selected to partner with The Northeastern University Law School during the 2018-2019 Academic year to examine and advance EON’s social justice goals.

Local voices weigh pros, cons on legal marijuana



BUY PHOTO

HIDE CAPTION

Ross Bradshaw of Auburn is in favor of the recreational marijuana use ballot question. T&G Staff/Steve Lanava

By Brian Lee

Telegram & Gazette Staff

Follow

Posted Nov 5, 2016 at 7:43 PM

Through his 6 years of experience as a respected Massachusetts marijuana advocate and entrepreneur fighting for equity, Ross has gained a unique experience and invaluable insight into the emerging industry, which has culminated into his vision of a marijuana business that truly reflects equity, opportunity, and diversity in action, New Día.

1.2. MISSION

New Día will be a state-wide example of how to best operate as a successful and responsible marijuana retailer, while at the same time empowering and enriching the communities we serve. Our mission is to provide ownership, employment, education and opportunity to communities most harmed by marijuana prohibition by providing a safe and secure means of access to regulated marijuana within the city. New Día will provide benefits to the community far beyond providing safe access to marijuana – diversity initiatives in the form of career counseling for individuals wanting to participate in the industry, business workshops for entrepreneurs, community revitalization, parent and youth marijuana education and overall access to economic empowerment services will be components of our offering.

Our belief, “Diversity in Action” emphasizes that our vision reaches far beyond just being a marijuana provider. Our diversity-centered philosophy represents doing business in a thoughtful, inclusive and inspiring way that will foster growth within our community.

1.3. ADVANTAGES

New Día has many advantages as a prospective marijuana retail operator in Worcester, MA.

○ **Established Roots in Worcester**

- *Family* – The majority of New Día ownership is comprised of members of the Bradshaw family. The Bradshaw’s have been members of the Worcester community for 8 decades. In addition, the Bradshaw’s were one of the first African American families to integrate the Westside of Worcester in the 1960’s.
- *Education* – New Día ownership consists of graduates from Worcester’s public and private schools including Doherty Memorial, Holy Name, and Worcester Academy.
- *Employment* – Our ownership has extensive experience working with some of the city’s most vulnerable citizens and marginalized communities with organizations such as Worcester Public Schools, The Bridge, and the Massachusetts Department of Recreation.
- *Residency* - 89% of New Día’s owners currently reside within Worcester

○ **Secured Community Support**

- On August 13th, New Día presented a company proposal for our retail store to be located at 118 Cambridge St. to the South Worcester Neighborhood Improvement Corporation’s board of directors. The board voted 17-1 in support of our proposal (**Refer to Appendix 8.1 for Letter of Support**)
- New Día held three public community outreach meetings for our proposal at 118 Cambridge St. The first, on June 28 2018 at 570 Mill St, the second, on August 16 2018 at 47 Camp St, and the third, on August 12 2019.

○ **Assistance in Community Revitalization**

- Purchase & Sales Agreement for 118 Cambridge Crossing Plaza
 - New Día’s revitalization efforts will be centered around the purchase of 118 Cambridge Crossing. Building improvements will assist in attracting new business for at least 6 other minority owned businesses also located in the plaza.
- Our retail location is not only properly zoned but, it is also located in one of the “disproportionate impacted communities” identified by the Cannabis Control Commission using statistics regarding marijuana arrests and unemployment

rates within the city. Our ability to serve, employ, and operate as part of this impacted community is at the heart of the New Día mission.

- **Certified as an Economic Empowerment Applicant**
 - In April New Día was among the first 9 awarded Economic Empowerment Applicants in the entire state. [Worcester T&G: worcester-marijuana-store-applicant-gets-priority-review](#)
- **Minority Owned**
 - New Día is not only an Economic Empowerment Applicant, but also minority owned. Out of Massachusetts' 38 authorized medical marijuana establishments, zero are majority minority owned businesses.
- **Experienced Management Team**
 - New Día's ownership has years of professional experience in education, mental health, management, finance, and the medical/recreational marijuana industry.
 - New Día's ownership and management team has a combined 35 years of experience working within the city of Worcester.
 - New Día's CEO has compliantly operated ancillary marijuana businesses in Arizona, California, Colorado, and Massachusetts. He has also successfully raised capital from some of the countries largest marijuana investment networks including [The ArcView Group](#) and [Canopy Boulder](#).

2.0 THE NEED

2.1. INEQUITIES WITHIN MARIJUANA

Over the past decade, studies increasingly have demonstrated African American and Latino communities have been disproportionately targeted and harmed by Marijuana prohibition. In 2010, blacks constituted 14% of the U.S. population but made up more than 36% of all arrests for marijuana possession, according to an American Civil Liberties Union study released in 2013. The report found African-Americans were nearly four times more likely than whites to be arrested for cannabis possession despite rates of similar use. Furthermore, evidence has shown that there is a significant lack in African American and Latino representation when considering ownership in medical marijuana and recreational marijuana licenses. The lack of diversity can be traced to multiple factors: rules that disqualify people with prior convictions from operating legal cannabis businesses, lack of access to banking services and capital to finance startup costs, and state licensing systems that tend to favor established or politically connected applicants.

As of August 16, 2018 there are currently 38 vertically integrated medical marijuana businesses licensed by the state and 0% are minority owned. In the city of Worcester there are currently 4 medical marijuana businesses anticipated to operate within the city. 0% are minority owned.



2017: Ross Bradshaw, along with members of EON and the Boston City Council advocating for legislative mandates in Massachusetts Law to include economic empowerment initiatives

Massachusetts' Adult use marijuana regulations address the lack of diversity in the state medical marijuana program and are the first in the nation to acknowledge that people of color and residents of low-income communities have been disproportionately targeted for drug enforcement. As a result of this disparity, state regulations include specific language prioritizing the ownership and participation of minorities and individuals from disproportionately harmed communities.

Despite the current lack of diversity in the state's marijuana industry, 2018 has been a historic year in Massachusetts for Social and Criminal Justice reform. Govern Charlie Baker and state legislatures moved forward with the passage of several policy changes focused on diversion programming, elimination of specific minimum sentencing, and assisting individuals convicted of crimes move on with their lives with initiatives like record expungement. This new movement is focused on breaking cycles of incarceration and creating opportunities for social justice. It supports and validates New Día's core philosophy as an economic empowerment applicant. We believe that the Massachusetts marijuana regulatory mandates surrounding equity and marginalized populations provides a unique opportunity for New Día not simply to provide marijuana, but to also utilize the marijuana industry to: (a) provide a diversity-centered approach to help remove barriers and improve opportunities for minorities and (b) serve as a "best practice" dispensary for targeted outreach and support services for Worcester's disproportionately harmed communities ([Refer to Appendix 8.2 for map](#)).

To be successful in this effort, New Día will continue the advocacy work of its founder and CEO, to create public awareness of economic opportunities and collaborate with other like-minded organizations through our community outreach and education programs. We plan on offering free workshops and Q&A sessions with community members and local service providers on topics related to marijuana education, and industry employment. Topics will also include overall marijuana education and state regulations. Through these workshops we make the existence of our organization known and attract other community organizations by positioning ourselves in the public mind as ambassadors of a local, socially responsible marijuana establishment.

Through our community engagement we have already begun to educate and discuss with community members the economic benefits of legalizing marijuana. Moving forward hosting educational forums for community providers will be a critical element in our business approach. Building strong alliances with other marijuana establishments, community service organizations, local businesses, employment agencies, advocacy groups, and the city of Worcester will be necessary. At the same time, it will give us greater resources to fulfill our own company mission, which includes assisting others to receive education and employment opportunities we cannot provide. We will demonstrate our commitment through sponsorships of community and industry causes and through industry activism that reflects our community-focused agenda and our emphasis on economic empowerment. Our community outreach and education department will carefully provide managed messaging and coverage in local media as a means of creating public awareness of our company mission, initiatives, and community impact.

3.0 THE NEW DÍA TEAM

3.1. NEW DÍA OWNERSHIP

New Día is owned and operated by professionals and Worcester residents with experience in management, security, finance, education, mental health, and the medical/recreational marijuana industry. The majority of owners are current or previous Worcester residents and have a combined 35 years of experience working in Worcester communities on a variety of issues. This breadth of experience and deep ties to the community will be needed to help guide us through the many complex issues that marijuana dispensaries will encounter within the city.

3.2. THE NEW DÍA LEADERSHIP

Ross Bradshaw

Ross Bradshaw serving as the company CEO, brings a unique skill set that is critical to the success of New Día operations. Ross is a graduate of Holy Name Central Catholic High School and Providence College as a recipient of a Martin Luther King Scholarship. He received his MBA and began his career as a CPA at Price Waterhouse Coopers, completing compliance audits for not-for-profit and pharmaceutical companies, followed by Bose Corporation where he performed operation assessments for manufacturing facilities and retail stores. For the past 7 years Ross has been a successful CPA and entrepreneur involved in a variety of cannabis businesses which has allowed him to develop a unique understanding of the industry, ranging from state regulations, marijuana business licensing, ancillary products and services, to 280E Tax enforcement. Ross has utilized his background in finance and compliance to conduct business with some of the most successful dispensary operators in the country including Massachusetts. In 2016 Ross was featured in the Denver Post's, [The Cannabist](#), along with 9 other industry influencers who made the successful transition from corporate America to legal marijuana.

In addition to his business experience, Ross has served as an advocate for Cannabis reform in Massachusetts dating back to 2013. From 2013 to 2015 he served as the treasurer on the Massachusetts Board of Directors of the National Organization Of Marijuana Reform (NORML). In 2014 Ross was nominated as a Massachusetts marijuana activist of the year.

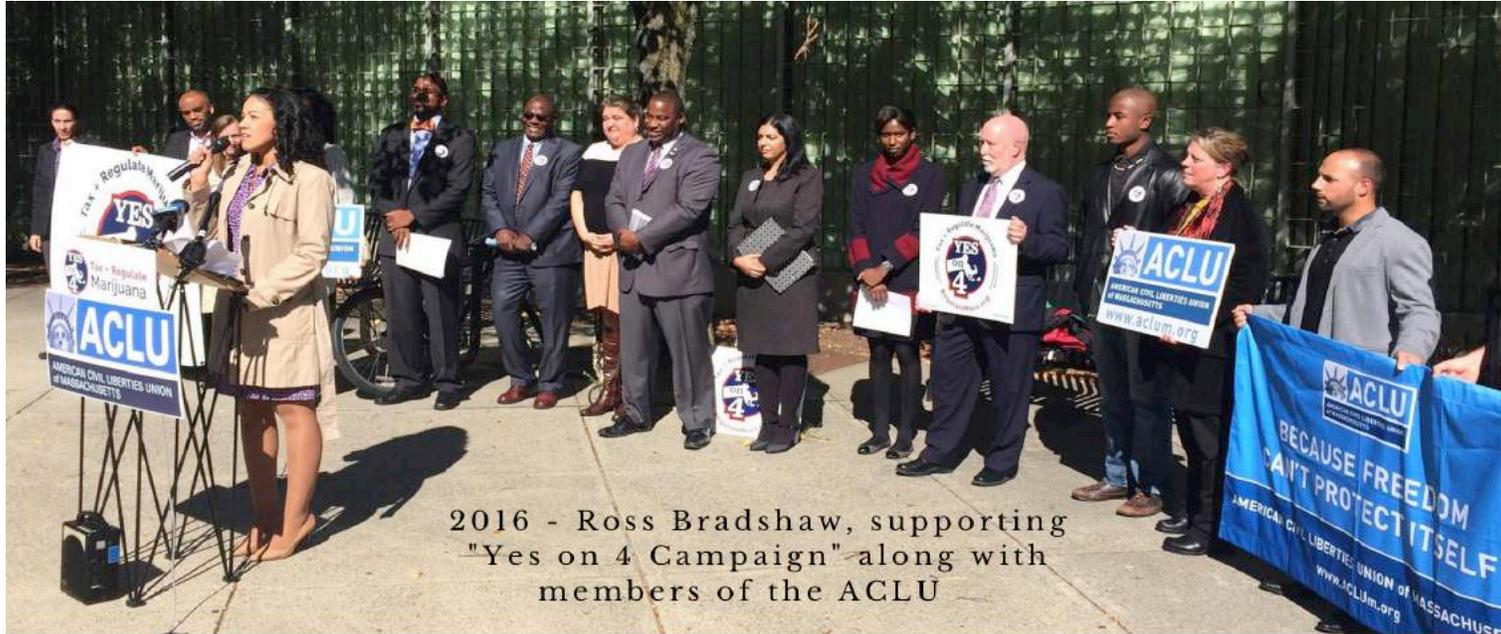
Most recently his advocacy work includes serving as a board of director for the non-profit Equitable Opportunities Now (EON). EON was founded in 2017 and specifically operates in Massachusetts to ensure just representation, equity, and opportunity for people of color within the cannabis industry ([Refer to Appendix 8.6 for detailed resumes](#))

Amanda Bradshaw

Amanda Bradshaw has committed her career as a school psychologist working in one of the state's most underserved public school districts, providing direct services and leading school-based teams in their efforts to provide comprehensive behavioral health services and support to all students and families. She is a graduate of Worcester Academy and attended Providence College as a recipient of the Providence College Dr. Martin Luther King Scholarship, earning a

BA in Psychology. Amanda went on to earn her Masters and CAGS (Certificate of Advanced Graduate Studies) in Psychology from William James College (formerly known as the Massachusetts School of Professional Psychology). Amanda has deep ties to the Worcester community and began her career as a Residential Counselor at the Bridge of Central Massachusetts providing support, guidance, advocacy, and case management within some of the cities most underrepresented neighborhoods. Amanda will lead the New Día community outreach and education programs. Amanda will also utilize her professional training in crisis prevention to assist the company in addressing the many challenges New Día may encounter.

Amanda is also well versed in the many unjust systems impacting African American and Latino communities. She has presented at the National Association of School Psychologists Annual Convention on racial disparities in school discipline and the disproportionate impact of exclusionary disciplinary practices on African American students. New Día will utilize her expertise to create concrete and targeted strategies to identify and repair such harms.



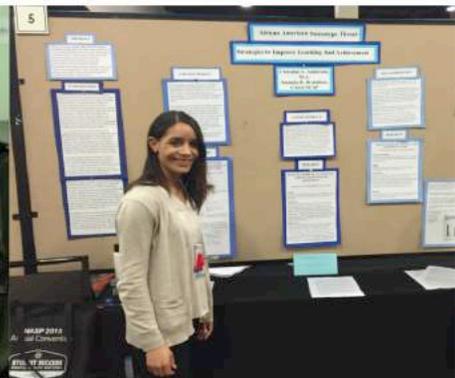
2016 - Ross Bradshaw, supporting "Yes on 4 Campaign" along with members of the ACLU



Amanda Bradshaw presenting a paper, Black and Bad: Reconsidering the discipline of African American students, at the annual National Association for School Psychologists Convention: Washington, D.C. in February 2014



Ross Bradshaw and former start-up, Healthy Headie Lifestyle, appearing on CBS THIS MORNING in 2015



Amanda Bradshaw presenting a poster session on African American Stereotype Threat: Strategies to Improve Learning and Achievement at the National Association of School Psychologist Annual Convention in February 2015 in Florida.

Ross Bradshaw in Boulder, CO as part of the CanopyBoulder's inaugural class in 2015



4.0 LOCATION

4.1. IMPACTED COMMUNITIES

New Día's proposed address for a retail marijuana establishment is 118 Cambridge Street, located in the South Worcester section of the city. The Cambridge Street Crossing Plaza where New Día seeks to operate is a bustling commercial street, with numerous storefronts and local vendors. This South Worcester area has seen little to no recent economic development in comparison to the neighboring communities of Main South and University Park. This has exacerbated the longstanding stagnation, lack of community identity, and vagrancy problems that plague South Worcester today. The presence of a secure, respected, and successful marijuana establishment, such as New Día, will likely reduce these issues.

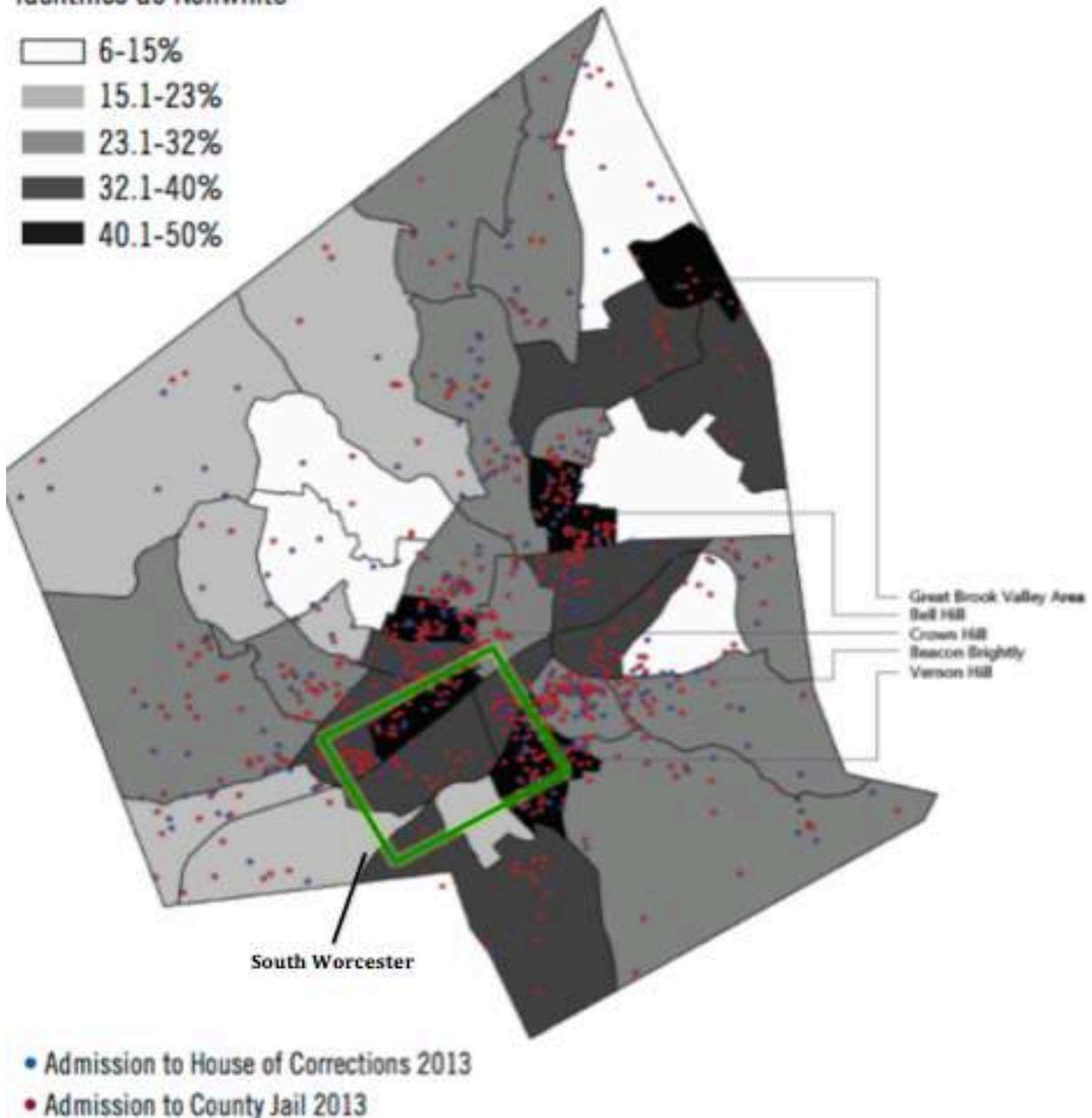
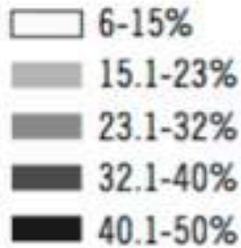
New Día and the proposed 118 Cambridge Street location are an ideal fit for a our marijuana retail establishment for several reasons including:

- **Properly Zoned.** 118 Cambridge Street meets all of the required State and City zoning ordinances for a retail establishment including a distance of at least 500 feet from certain uses, including schools, parks, and registered child care centers.
- **Disproportionately Impacted Area.** Utilizing arrest data and unemployment rates, the State Cannabis Control Commission has identified only 14 census tracts in the city of Worcester that qualify as areas historically disproportionately impacted by marijuana enforcement. 118 Cambridge Street (*Census Tract 7312.04*) is one of them.

Separate research conducted by the Massachusetts Criminal Justice Reform Coalition in ["The Geography of Incarceration in a Gateway City"](#) also validate similar findings that illustrate South Worcester and its surrounding communities have suffered from elevated rates of incarceration among its residents.

Map 2: Returns from the Worcester County Jail and House of Correction by Neighborhood Race/Ethnicity, 2013 Admissions

Percent of Neighborhood Population that Identifies as Nonwhite



At the core of New Día’s mission, as an economic empowerment applicant, is to assist in the remediation of the harm that has been experienced in these communities, and locating at 118 Cambridge Street is fundamental to our execution. It will allow New Día to invest in the community and to create comprehensive community based strategies that improve outcomes for residents.

- **Community Ties.** The owners and management of New Día are well aware of the challenges that have afflicted the communities surrounding the Cambridge Street Plaza and have years of experience residing and working within these communities.

5.0 THE NEW DÍA APPROACH

New Día will use a community-driven, diversity-centered approach that will benefit community residents and local businesses. This approach includes creating safe, regulated, access to marijuana while simultaneously providing education, employment and economic opportunities to community residents. This commitment includes:

- Investment in community revitalization
- Education workshops
- Technical assistance to individuals entering the cannabis industry
- Community collaboration
- Skilled and knowledgeable staff from within the community
- A safe and professional retail setting
- Laboratory tested products

5.1. COMMUNITY REVITALIZATION

High and disproportionate rates of incarceration, as experienced in South Worcester, further exacerbate existing barriers faced by people and communities of color. The collateral consequences associated with such incarceration have limited opportunities for employment, education, training, financial security, and civic engagement.

As one of the only local and minority owned operators, who have years of first hand experience with the issues that have stifled the growth of the community, New Día, along with our revitalization efforts, has the potential to provide the most value to this immediate area. The first step in our revitalization efforts will be the purchase of 118 Cambridge Crossing Plaza.

In the spring of 2018, New Día successfully reached an agreement with the current owner, that will allow New Día to execute a greater vision beyond just a marijuana retailer, in creating a space that unites the community, attracts visitors, and supports minority-owned businesses for years to come.

Upon receiving a community host agreement from the city of Worcester and a provisional license from the State Cannabis Control Commission, New Día will exercise its option to purchase the shopping plaza, which includes a total of 8 retail spaces along with 10,000 sq ft of unoccupied warehouse space.

The shopping plaza tenants currently occupying 6 of the retail storefronts, consist mainly of immigrant business owners from Jamaica, Vietnam, Pakistan, Liberia and El Salvador. New Día

is committed to ensuring these existing small businesses and ethnic shops remain as part of the neighborhood's identity and continue to serve a clear market demand. As new owners of the plaza, we will assist business owners in growing these community assets, and create a cohort of local businesses that can deliver tangible benefits to the surrounding communities.

Our goal as new business owners will be to compliment what already exists in the neighborhood and increase economic opportunities for local businesses and residents. New Día will accomplish these goals through our revitalization strategy that includes:

1) Beautification Efforts

- Company sponsored community cleanups to address litter in the surrounding business and residential community.
- Coordination of New Día cleanliness efforts with city agencies such as 'Keep Worcester Clean'.
- Investment in sustainable streetscape and capital Improvements including:
 - New paint and fixtures to exterior of building
 - Pavement of parking lot and sidewalk areas
 - Improved outdoor lighting for automobiles and pedestrians

2) Strengthening Business for Local and Minority Owned Operators

- Creating a welcoming and thriving multicultural retail destination for new and returning customers
- Helping preserve existing businesses that provide employment in a non- marijuana related fields
- Organizing campaigns and promotions to highlight these local businesses and provide visibility as alternatives to larger retailers
- Purchasing products and services from local vendors in the community whenever possible
- Attract new businesses to vacant storefront and 10,000 sq feet of vacant space.
 - Potential options include negotiating lower rents for promising new businesses, or using vacant storefront as pop-up space for local entrepreneurs that need visibility

3) Employment Opportunities & Job Training

- Establish benchmarks with percentage goals for hiring directly within the South Worcester community.
- Develop inclusive hiring practices with focus on hiring women, minorities, and individuals with marijuana related Cori.
- Target local recruitment through direct community outreach and engagement.
- Build a partnership with local community-based organizations to develop workforce training and skills development programs.

4) Increase Public Safety

- Establish a visibly safe and secure presence in the neighborhood.
- Reduce crime in immediate area through our interior and exterior security measures.
- Partner with the local police force and neighborhood watch to identify criminal activity and community nuisances.

New Día revitalization efforts will bring new people and energy to the South Worcester area, while benefitting current businesses and residents. The existing empty and underused area at Cambridge Street plaza has untapped potential for reinvigorating the community and expanding economic opportunity. Through public engagement, strategic planning, and community support, New Día is capable of fostering a center of economy, culture, and progression.



118 CAMBRIDGE CROSSING

POST BUILDING IMPROVEMENTS - 2019

Community Revitalization

- BEAUTIFICATION EFFORTS
- STRONGER BUSINESSES
- EMPLOYMENT OPPORTUNITIES
- SAFER COMMUNITIES



CURRENT STATE - 2018

5.2. EDUCATIONAL WORKSHOPS

New Día will provide ongoing educational workshops within the community to educate and inform residents, parents, coaches, and other community stakeholders of responsible marijuana use, potential risks of over-consumption, and the legalities of recreational marijuana. We will offer these education workshops on an ongoing basis, as well as upon request. Having an educational component within our business model is essential to our commitment to be a responsible, industry-leading, community-based dispensary. New Día's educational component is also a vital part of our company mission given the rise in harmful, synthetic marijuana drugs, such as K2, that have become widely available in our communities.

New Día's founding member, Amanda Bradshaw, will be leading our efforts in organizing these workshops. Amanda has years of experience working with students, parents and school administrators in educational settings. Their expertise in working with schools that serve marginalized and at-risk populations will be valuable to New Día's commitment in cultivating awareness and prioritizing responsible consumption. New Día's educational workshops and literature will also be available and accessible to Spanish speaking individuals.

Another component of our educational initiatives will focus on youth prevention using a harm-reduction approach. It has been widely documented that abstinence programs alone are ineffective at providing accurate information and reducing drug-use among youth. New Día's approach will be modeled after harm-reduction programs such as [Safety First: A Reality-Based Approach to Teen and Drugs](#) developed by the Drug Policy Alliance. In addition to encouraging abstinence, our educational approach will provide youth with access to accurate information regarding substances and their use, healthy decision-making practices, peer prevention, and marijuana regulations.



In addition to New Día's independent efforts to educate the community, we will welcome the opportunity to collaborate with parents, parent teacher organizations (PTOs), school administrators, community stakeholders, and the city of Worcester to mitigate possible perceived harms by the emerging marijuana industry in the city. In addition, New Día will look to collaborate with neighboring schools and agencies to conduct a needs assessment to

determine the resources and services needed to ensure our efforts address any concerns within the greater community that may arise.

As part of the city's efforts to restore harm to communities that have been disproportionately impacted by marijuana prohibition, it is highly recommended that the City of Worcester consider how marijuana prohibition and zero tolerance policies have played a significant role in criminalizing the city's youth, particularly males of color, through the school-to-prison pipeline. New Día will look to coordinate with Worcester police department and neighborhood watch groups in its education and restorative justice efforts.

5.3. YOUTH MENTORSHIP

In addition to providing educational workshops, New Día will also seek to engage young members of the community through mentoring services. Mentorship involvement can serve as a protective factor for at-risk youth who may otherwise become involved in risky and/or harmful behaviors. Furthermore, it is especially important for youth from disproportionately harmed communities that have experiences high rates of incarceration, violence, and poverty, to foster positive relationships and influences within their neighborhoods to be set up for future success.

5.4. TECHNICAL ASSISTANCE

A vital component to our mission, anchored in economic empowerment, is providing residents with the tools and resources to become successful participants in the legal marijuana industry. New Día will utilize the expertise of its founder and CEO, Ross Bradshaw. Through his advocacy efforts with Equitable Opportunities Now (EON), Ross has worked extensively with individuals and organizations from disproportionately harmed communities, including many fellow Economic Empowerment applicants. Support and assistance he has provided to individuals and businesses in the past include:

- Interpreting 935 CMR 500: Adult use of marijuana
- Completion of marijuana licensure applications (including the Economic Empowerment Application)
- Navigating Municipal Zoning & Guidance
- Business Incorporation
- Developing Financial Models and Reports
- Understanding Tax Code 280E

New Día will offer similar professional and technical support services to local businesses in collaboration with reputable organizations such as EON.



Ross Bradshaw, along with two fellow EON board of directors and a member of [CommonWealth Kitchen](#) (a Boston Food Business Incubator) at an EON Edibles Production Seminar held for aspiring entrepreneurs in Dorchester.

5.5. COMMUNITY COLLABORATION

A crucial element of the New Día approach will be our representation of the needs, wants, and concerns of the community. New Día will educate and empower its staff, customers, and the greater public to be informed, responsible, and contributing members within the community. As a good neighbor and devoted business to the community, New Día will be proactive in outreach and collaboration efforts with neighborhood leaders to ensure our actions mirror the diversity and ideals of the community. We will develop trust within the community by:

- **Community Partnerships**
 - Work with community service organizations, local businesses, employment agencies, and advocacy groups to coordinate initiatives and collectively address community concerns.
- **Community Leadership and Sponsorship**
 - Participate in community sponsorships, causes, and activism.

- Community Contributions
 - Provide annual monetary contributions to community organizations to be used for community services and overall improvement efforts.

This collaboration amongst ownerships, staff and the greater community will empower residents and encourage much needed civic engagement. Emphasis will be placed on neighborhoods and individuals within the immediate community, taking advantage of the education, employment, and empowerment opportunities that are offered by New Día.

5.6. SKILLED AND KNOWLEDGEABLE STAFF

Our staff will undergo extensive training in order to be able to advise customers on such things as specific products and side effects of various strains and delivery methods. Our approach is designed to address any information deficit and education need ranging from first-time to experienced consumers. Our educational approach will be another differentiating factor of our brand and engagement with the community.

New Día management is currently in discussion with representatives of Fremont College (accredited by the Accreditation Commission of Career Schools and Colleges) to offer our employees training via a 5 week on-line course that covers a variety of topics relevant for employment within the industry.

If the New Día team finds that the curriculum is of value for new hire training and would be of use to community members considering entering into the Marijuana industry, New Día will explore a scholarship program to offer community residents, free of charge, access to the cannabis course.



Key Topics in This Course

- √ Cannabis History, Law & Civics
- √ Endocannabinoid System
- √ Cultivation
- √ Dispensary Management
- √ Hemp Products
- √ Cannabis Extractions & Infusions
- √ Patient Counseling
- √ Brand Development & Understanding
- √ Relationship selling



Learn from an Accredited College

5.7. SCIENTIFIC QUALITY CONTROL

Any product sold at our dispensary will be tested for purity and potency by one or more registered, independent testing laboratories, and bear a guarantee of scientific quality control. These facilities will test products for mold, mites, and inorganic pesticides. They will also be testing for THC and CBD content.

5.8. PROFESSIONAL RETAIL SETTING

Our atmosphere will be designed as a safe and welcoming environment to move marijuana away from the outdated association with the “stoner” counterculture. Our dispensary will maintain the professional look and feel of an upscale retail establishment, that will enhance the image of the surrounding business community.



Interior Rendering of New Dia Dispensary Floor

6.0 COMMUNITY OUTREACH & SUPPORT

6.1 COMMUNITY OUTREACH SUMMARY

The leadership of New Día has conducted a thorough community outreach effort to ensure that residents in the surrounding community are aware of the proposal and have had ample opportunities to ask questions or provide insight. Community outreach efforts met, and exceeded, all requirements under the adult use marijuana regulations, 935 CMR 500.101.

New Día's community outreach efforts included two public community meetings.

1) June 28, 2018 at 6PM - 570 Mill Street, Worcester

- At least 7 calendar days prior to the meeting, the notice was:
 - Published in the Worcester Telegram
 - Filed with the City Clerk
 - Emailed to City Councilors Matthew Wally & Sarai Rivera
 - Mailed to abutters within 300 feet of the property line
- Information presented during the meeting included the type of marijuana establishment, the location of the establishment, members of the New Día team, and plans for positively impacting the community. Please refer to our [RFI Dropbox link](#) for a copy of the meeting sign-in sheet, one page handout and PowerPoint presentation.
- Two community members were in attendance and zero objections were raised to our proposal for a retail marijuana establishment at 118 Cambridge Street.

2) August 16, 2018 at 6PM - 47 Camp Street, Worcester

New Día's second public community meeting was held in collaboration with and support from the South Worcester Neighborhood Improvement Corporation (SWNIC)

- Prior to the meeting, the notice was:
 - Emailed to City Councilor Sarai Rivera
 - Distributed by SWNIC to community members and families
 - Discussed directly via phone calls with community stakeholders
 - Polar Beverages – Chris Crowley
 - Table Talk Pies – Harry Kokkinis

- Left via voicemails with community stakeholders
 - Absolute Machinery – Nate Smith
 - The Village – Lynn Millette
- Information presented during the meeting included the location of the establishment, members of the New Día team, and future community support services and education efforts.
- Five community members were in attendance and zero objections were raised to our proposal for a retail marijuana establishment at 118 Cambridge Street.

In addition to New Día’s two public community meetings, significant efforts have been made to notify the public, neighbors, community stakeholders, city officials and elected officials. Outreach meetings held included:

- **Main South CDC – Steve Teasdale**
July 23rd, 2018, 10am
857 Main St, Worcester
- **Centro – Juan Gomez**
July 27th, 2018, 9:30am
11 Sycamore St, Worcester
- **South Worcester Neighborhood Improvement Corp – Ron Charette, Val Tourtellotte, Tom L’Ecuyer**
July 30th 2018, 10am
47 Camp St, Worcester
- **Worcester Common Ground – Yvette Dyson**
July 31st 2018, 10am
5 Piedmont St, Worcester
- **State Representative – Mary Keefe**
August 8th 2018, 3pm
Boston State House, Boston
- **Workforce Central & New Leaf – Janice Weekes & Roy Lucas**
August 10th 2018, 1pm
340 Main St, Worcester
- **Temescal Wellness – Ted Rebholz & Julia Germaine**
August 10th 2018, 1pm
34 Cochinate Rd, Framingham
- **South Worcester Neighborhood Improvement Corp – Board of Directors**

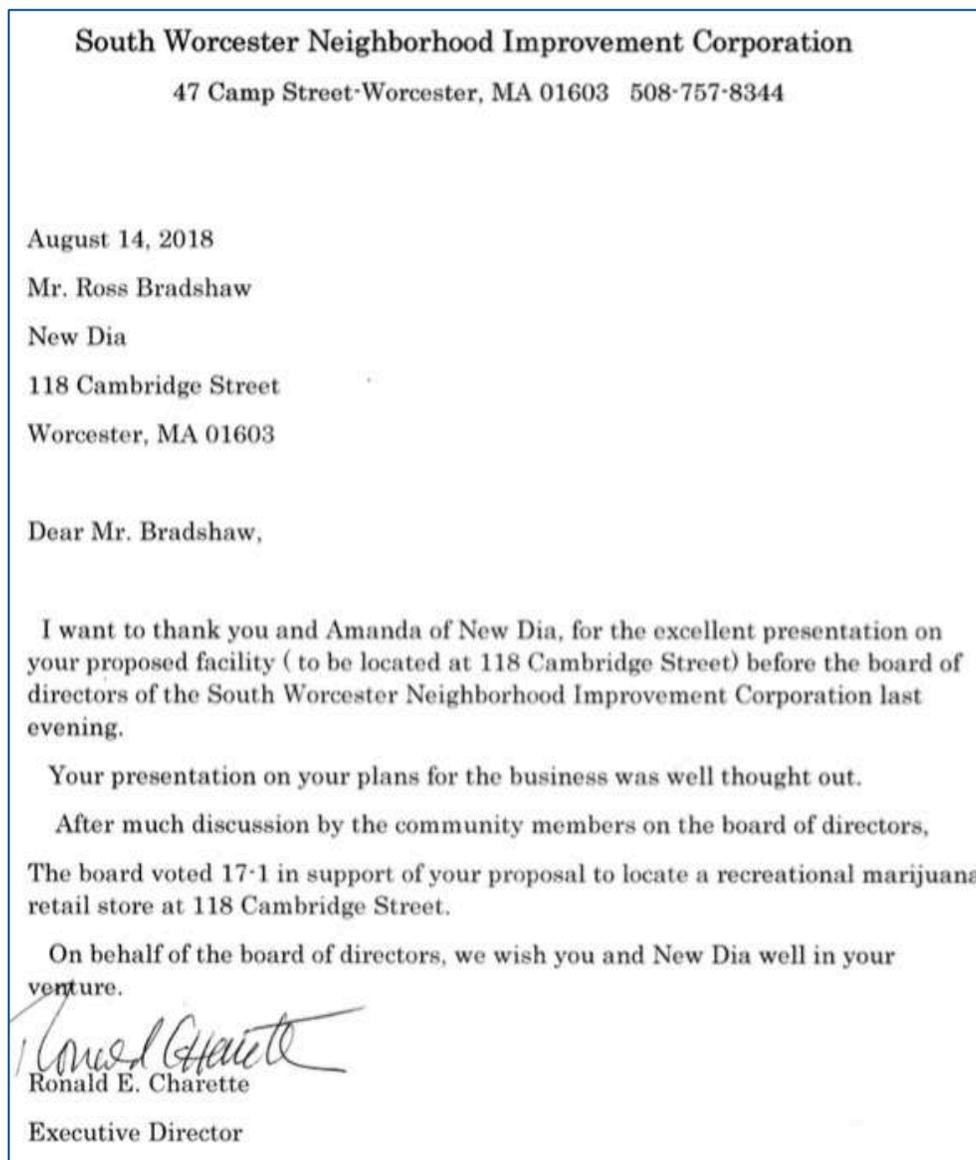
August 13th 2018, 6pm
47 Camp St, Worcester

Please refer to our RFI Dropbox link for meeting materials and agendas.

6.2 COMMUNITY SUPPORT

On August 13th, Ross and Amanda Bradshaw presented New Día's proposal for a retail establishment to the South Worcester Neighborhood Improvement Corporation's board of directors. The board voted 17-1 in support of our proposal. Please see Appendix 8.1 for the letter of support.

Throughout New Día's numerous community outreach meetings and nearly month long discussions with community members, there was only 1 individual who voiced opposition to our proposal for a retail establishment at 118 Cambridge Street.



7.0 COMPANY OPERATIONS

7.1. EMPLOYEES AND TRAINING

Employee Needs

Once fully operational New Día will employ a staff of 12 people, in a combination of full and part time positions, including its officers. Employee demand is based on anticipated hours of operations being Monday – Sunday, from 11am to 7pm ([Refer to Appendix 8.3 for Daily Work Schedule](#)). Employee positions will include:

- 3 Managers: 2FT and 1 PT (Operations / Loss Prevention, Merchandise & Inventory, Customer Experience)
- 7 Sales Associates: PT
- 2 Security Offices: 1 FT and 1 PT

This balance of fulltime and part-time employees will ensure that during hours of operation an assigned greeter is always present at the dispensary entrance, 2 sales associate are available at registers to service customers and 2 managers are available to oversee dispensary floor activities. Depending upon position, employees at New Día will receive an hourly rate of \$15 - \$20 per hour, with the potential for overtime ([Refer to Appendix 8.4 for detailed job descriptions and responsibilities](#))

Employee Recruiting

New Día will concentrate on recruiting from the surrounding community. Emphasis will be placed on hiring women and minorities residing in the South Worcester, Main South, and Webster Square areas. It is the policy of New Día to have a majority of its staff from these communities. All staff will be members or volunteers of at least 21 years of age.

After an application and job selection process, all candidates will undergo criminal and background checks, however marijuana related Cori's will not be a factor for non-employment.

Employee Training

All New Día employees will be required to complete training that will include review of employee work handbook, completion of relevant reading materials, and attending presentations by qualified professionals, and hands-on training. In addition, training will consist of:

- **Compliance.** Compliance training will cover all municipal and state laws requirements relating to retail marijuana establishments. Other topics may include the rules and regulations of the dispensary, sexual harassment training, effective interaction with law enforcement personnel, and the rights and responsibilities of marijuana customers.

- **Dispensing.** Staff will be trained in customer care and retail sales. The focus will be on assisting customers in making appropriate decisions about how to choose the type of product that is right for them. Staff will be provided with ongoing training in product information as well as general service philosophy.
- **Safety.** In addition to its focus on safety, security training will include acceptable identification and counterfeit detection, warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution techniques, and diversion detection techniques.
- **Substance Abuse.** Employees will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependence, and withdrawal. They will also receive training on the differing strengths of marijuana strains, products and the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, non-prescription drugs, and supplements.
- **Diversity.** Because of our focus on diversity and community-centered service, staff training and education will go beyond the standard diversity and cultural training. This means having socio-cultural, and linguistic competencies needed to communicate effectively with customers regardless of their level of education, language, or socio-cultural background.

7.2 PRODUCTS

Dried Marijuana Flower: Sativa, Indica, & Hybrids

The effect of marijuana is directly related to strain selection, therefore we will recommend care be taken in selecting appropriate strains to meet customers level of experience and desired effects. Customers will be encouraged to use vaporizers, or ingest marijuana to reduce any potential risks from smoking. Dried manicured product will be sold in single gram to 1 ounce increments. New Día plans to begin with 15 varieties of marijuana sourced from local licensed cultivators and product manufactures.

7.3. DISPENSING PROCESS

New Día employees will adhere to the following process when dispensing marijuana products to customers.

Step One: Upon entry to the New Día dispensary, customers must first check in with a dispensary agent at reception before assessing the dispensary floor. The dispensary agent will request that the customer provide verification that the individual is 21 years of age or older, by valid proof of identification. Acceptable proof of identification will include an unexpired government-issued photo ID card with name, photograph, and date of birth. This will be limited

to one of the following: Driver's License, Government-issued ID card, Military ID card, or Passport.

The dispensary agent will first verify the date of birth on the form of identification provided, and then compare the form of identification to the person providing them. If the form of identification does not verify that the individual is 21 years of age or older, or the form of identification does not appear to be a form of identification that belongs to the person providing them, the dispensary agent will deny any sale of marijuana to that person and notify the security officer on duty.

Customers with valid identification will be directed to the dispensary floor where they will be assisted with selecting products.

Step Two: After selected products for purchase, the dispensary agent will verify the amount of marijuana the customer is purchasing does not exceed the limit of one ounce of marijuana or five grams of marijuana concentrate to a customer per transaction. If the amount of marijuana the customer is requesting would cause the customer to exceed the transaction limit, the dispensary agent will deny the sale of marijuana to that person to the degree that any sale would cause the customer to exceed the limit.

Step Three: The dispensary agent will record the sales transaction utilizing an authorized point-of-sale (POS) system. At a minimum, the approved POS system will capture the following:

- Amount of marijuana dispensed
- The date and time the marijuana was dispensed
- A description of the type of marijuana product dispensed
- The identification number of the dispensary agent
- The identification number of the registered product manufacture or cultivator that produced the marijuana product
- The marijuana product retail price and cost of goods

Step Four: The dispensary agent will offer the customer educational materials about the products purchased. Educational materials will be available in commonly spoken languages. Education materials provided by the dispensary agent will include at least the following:

- 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
- A warning that when under the influence of marijuana, driving is prohibited and machinery should not be operated

- 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
- Materials offered to consumers to enable them to track the strains used and their associated effects
- Information describing proper dosage and titration for different routes of administration. Emphasis will be on using the smallest amount possible to achieve the desired effect and the potential impact of potency
- Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs within the area
- A statement that consumers may not sell marijuana to any other individual
- Information regarding penalties for possession or distribution of marijuana in violation of Massachusetts law
- Any other information required by the Commission.

Step Six: If at any time during any interaction with an individual attempting to purchase marijuana the dispensary agent determines that the individual appears to be impaired or abusing marijuana, the dispensary agent is permitted to deny any sale of marijuana to that person. In any denial of sale event, the dispensary agent will complete a Denial of Sale Form, which will be then reviewed by the General Manager and retained for record retention.

Step Seven: At the conclusion of the sales process, customers will receive the product in an opaque child resistant bag and exit the building to the entrance parking area.

7.4. PRODUCT STORAGE

New Día's marijuana product storage procedures are divided into three categories: Bulk Storage, Final Packaging, and Products to be disposed. All product storage will be maintained within a secure vault with adequate lighting, ventilation, temperature, humidity, space, and equipment. Marijuana that is in final packaging is stored in the vault during non-business hours and in secured, locked display cases within the dispensing area during business hours. Products to be disposed consist of marijuana that is outdated, damaged, deteriorated, mislabeled, contaminated, or whose containers or packaging have been opened or breached. Products to be disposed will be labeled as such and maintained in a separate locked cabinet until they can be properly disposed of in accordance state regulations.

Areas of the dispensary where marijuana is stored, handled, or inspected are secured with electronic locks and video monitoring. This area will be designated as a "Limited Access Area", accessible only to designated personnel. Surveillance cameras shall be directed at all interior and exterior lighted areas and entry points to record any authorized or unauthorized entry into designated limited access areas.

7.5. PREVENTION OF DIVERSION

New Día will implement numerous safeguards throughout our operations to ensure the prevention of diversion of marijuana products to the illicit market and to individuals under the age of 21. In addition to 24/7 video monitoring, weekly, monthly, and annual inventory counts, and enforcement of restricted access areas, New Día will utilize the state approved POS System to identify patterns of purchases that may suggest product diversion. One such diversion pattern, employees will be trained on is the purchasing practice referred to as “Looping”, where a customer buys their legal limit then deposits that purchase somewhere, and returns to make another purchase. This is then repeated, or “looped.” Such “looping” tactics, if discovered will be immediately notified to local law enforcement and the cannabis control commission via our incident reporting procedures. In addition to our internal training and security procedures New Día will continuously educate customers on possession limits and reserves the right to refuse sales to any individual who exhibits suspicious purchasing patterns.

7.6. SECURITY

Customer, employee, and neighborhood security are our highest priority. We have, in partnership with our security consultant, American Alarm, developed a state-of-the-art plan that takes advantage of the security industry’s best practices and most up-to-date technology, ensuring that our dispensary operates at the highest level of legal compliance and security preparedness. A summary of our operating plans are as follows:

Exterior Building Security

The following security protocols will ensure that the exterior of the dispensary is secure while providing a safe, welcoming, and professional environment:

- Video cameras will provide exterior coverage of all entrances and any activities occurring outside or adjacent to the building
- Only one entrance will be used for customer access
- During business hours, a Security Officer will be charged with monitoring the parking lot and area surrounding the dispensary, and strictly enforcing loitering policies
- The entrance to the dispensary sales floor will be protected with a electronically controlled locking mechanism to prevent entrance to the facility without proper authorization
- All windows and any other enclosures that currently provide a view of the inside of the dispensary will be covered with security film
- Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates.

Loitering

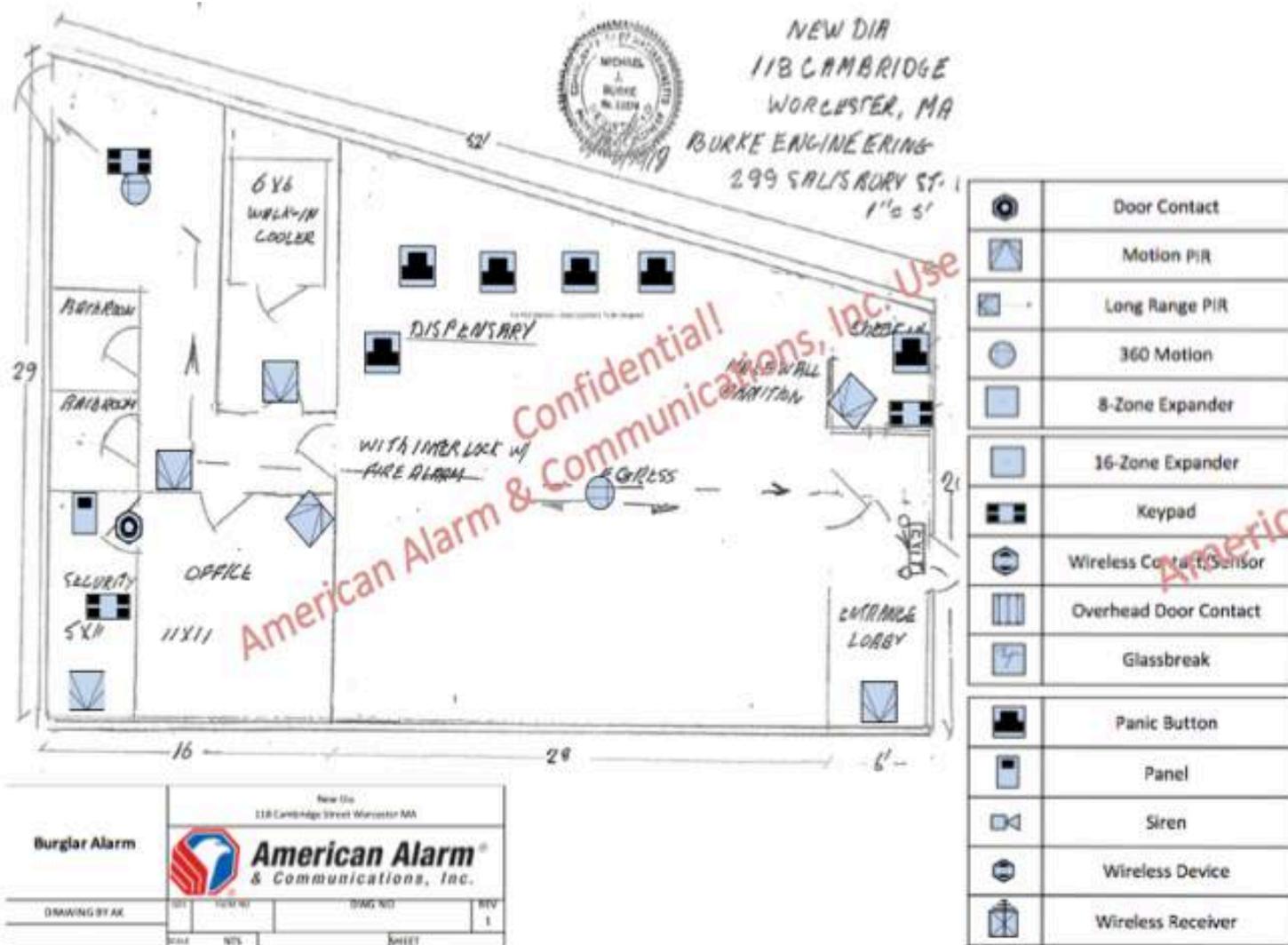
New Día will implement a strict no loitering policy which will include posted signs stating "no loitering" throughout the parking area utilized by customers. Signs shall be placed in locations visible to all customers. The Security Officer will monitor the public areas around the dispensary building to ensure no loitering is taking place and will escort individuals away from the public areas around the dispensary, or if necessary, contact law enforcement for assistance, in the event any loitering occurs.

To address any potential issues identified by neighboring businesses or residents, we will provide customers and neighbors with the name, phone number, and email address of our community relations director who will be responsible for addressing any neighborhood concerns that are brought to our attention.

Interior Building Security

The following security protocols will ensure that the interior of the dispensary is secure for customers and employees:

- Video cameras, which will operate 24/7, in all areas that may contain marijuana, at all points of entry and exit and in the reception area. The cameras shall be directed at all safes, vaults, sales areas and areas where marijuana is stored, handled or dispensed.
- A failure notification system that will provide an audible, text or visual notification of any failure in the surveillance system. The failure notification system shall provide an alert to designated employees of the Marijuana Establishment within five minutes after the failure, either by telephone, email or text message;
- Audible and silent alarms connected to local public safety or law enforcement authorities.
- Panic buttons installed at each point-of-sale location, in the vault, and under the reception stations, and when pressed will immediately contact local law enforcement officials.



Access Control

All dispensary access points will be controlled by an automated access control system. The interior operations will be monitored such that all entry into the building is regulated, and all activity throughout the facility can be tracked. Only personnel that are essential to the operation of a given area will be allowed access to that area.

Limited Access Areas

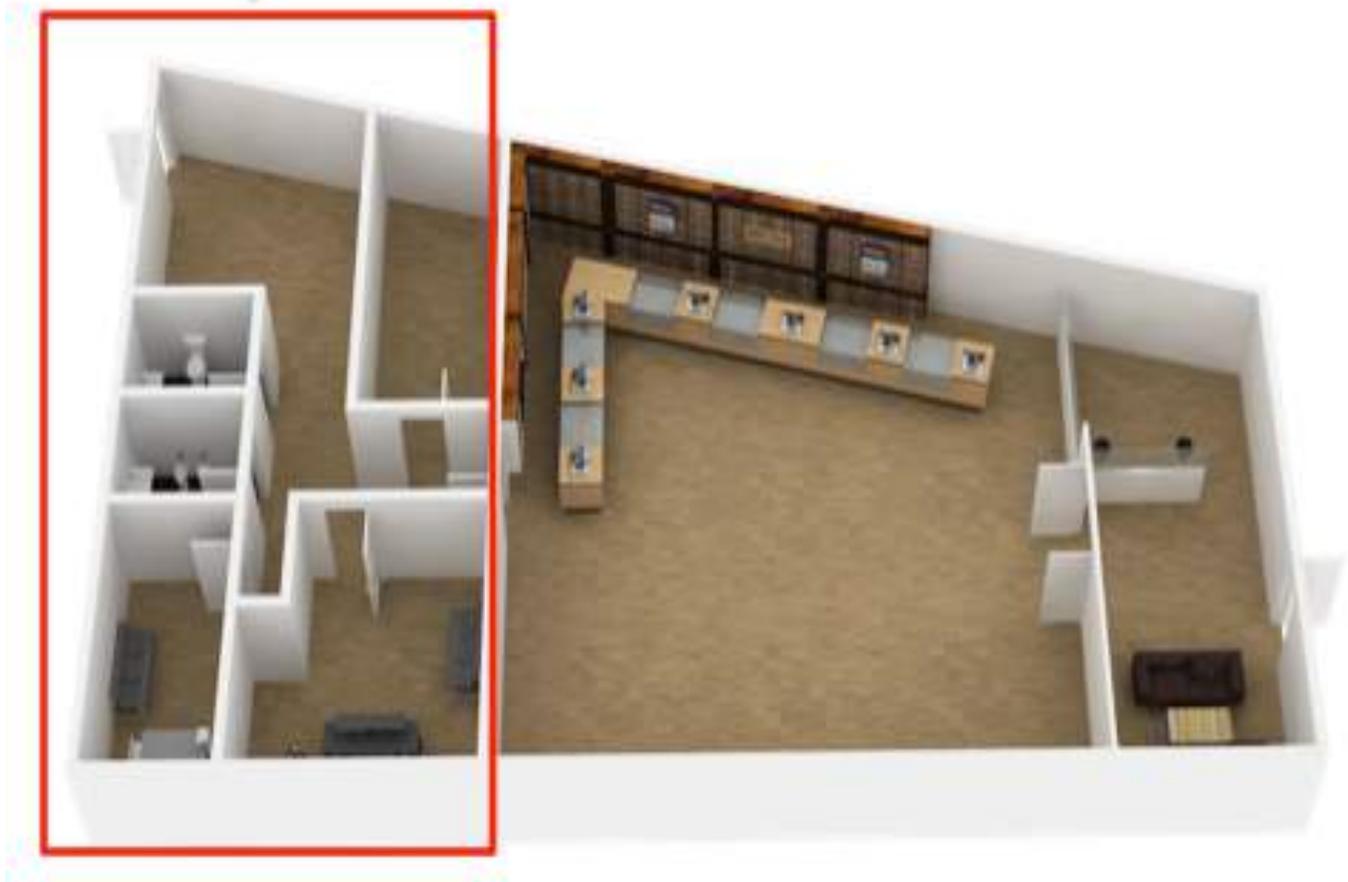
New Día will establish limited access areas accessible only to specifically authorized personnel. Access to secure areas will be controlled through the use of access control devices, including electronic locks and access cards. Access to the controlled areas will be limited to employees,

agents or volunteers permitted by New Día, agents of the Commission, state and local law enforcement and emergency personnel.

New Día will provide all dispensary agents with varying levels of access to limited access areas depending on their position. All access cards granted to dispensary agents must be returned to security personnel at the end of each shift to ensure proper and safe storage.

All visitor access will be strictly controlled. Outside vendors, contractors, visitors, and volunteers must obtain and wear a visitor identification badge prior to entering any limited access area. Visitors will be escorted by a security personnel at all times while inside any area where marijuana is packaged and stored.

Limited Access Areas

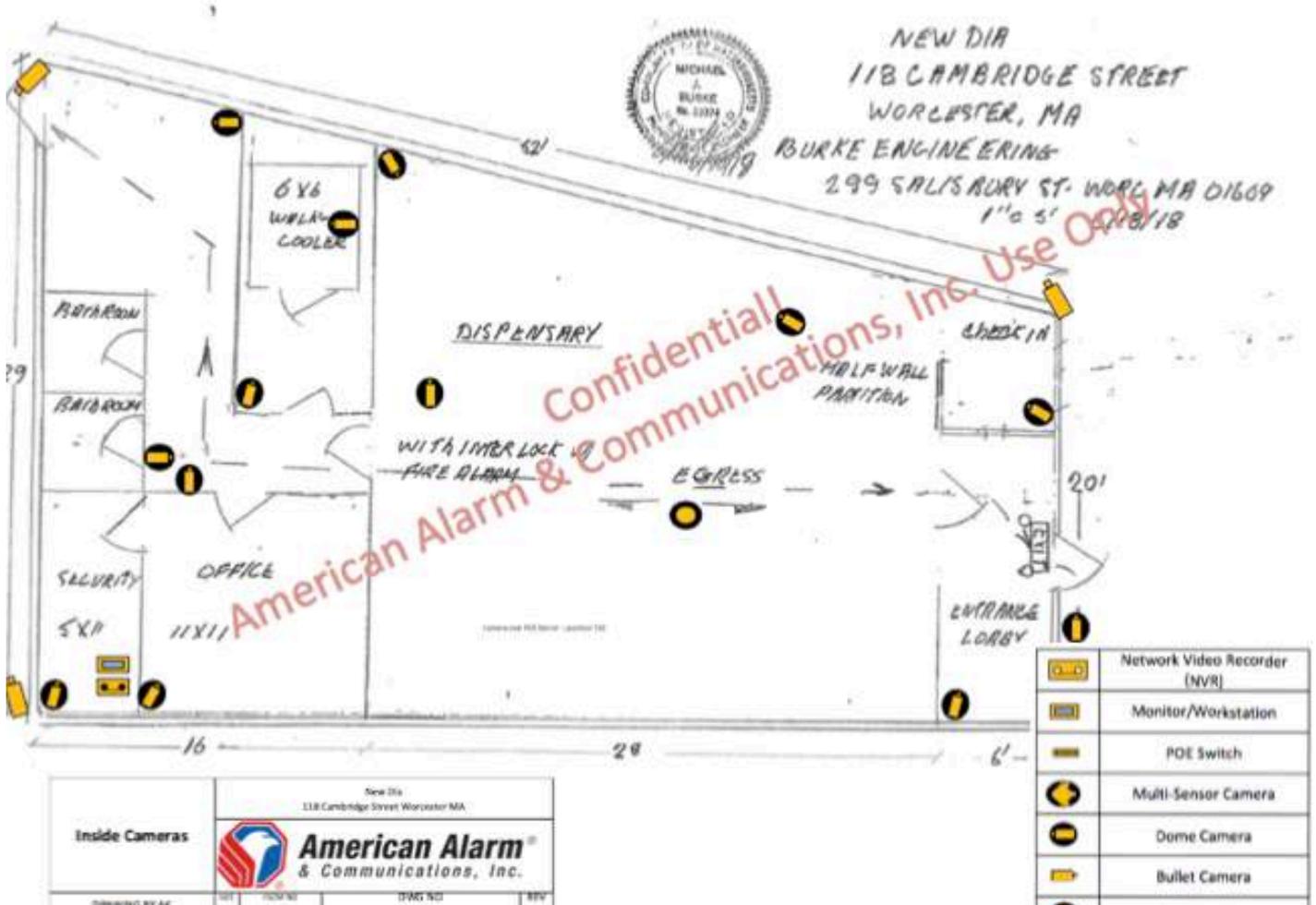


Electronic Monitoring

New Día will comply with all regulations in accordance with state regulations with regard to mandatory security and monitoring devices to prevent and detect unauthorized intrusion into the dispensary building. New Día will contract with American Security and Alarm monitoring company to conduct in-person and remote surveillance of the dispensary building on a 24/7 basis. Video recordings will be retained for a minimum of 90 days.

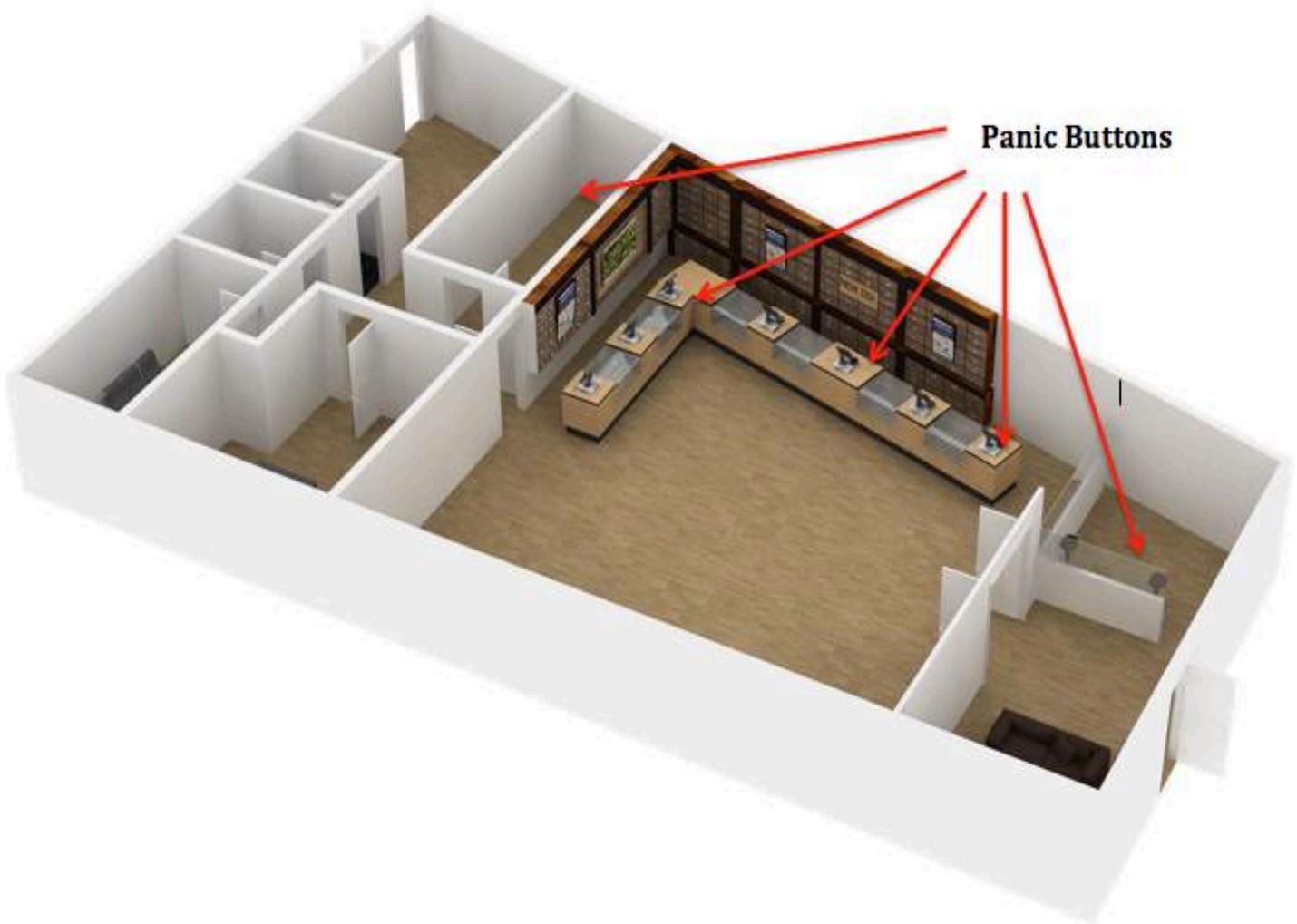
In addition, during business hours, the Security Officer on duty will ensure that all electronically restricted access controlled doors are properly secured with the alarm armed to notify of any unauthorized intrusion. During non-business hours, the Security Officer on duty will ensure that the security system is armed and operational by securing all interior doors, exterior doors, and setting the security system by way of a confidential access code. Security personnel, as well the general manager, will receive email, text, and call notification of the system failure within five minutes after a failure.

New Día will conduct electronic monitoring in and around the dispensary building, as well as monitoring of all visitors in the parking lot area. All customers entering the dispensary shall remove their hats, sunglasses, and other similar objects, which obstruct physical identification. To prevent unauthorized access to marijuana, the dispensary will have security equipment to deter and prevent unauthorized entrance into limited access areas, which will include electronic video and visual monitoring.



Panic Buttons

New Día will install and maintain working panic buttons in the interior of the dispensary. All dispensary agents within the dispensary building will be trained to use and will have access to multiple panic buttons throughout the site. Panic buttons will be located within the dispensary at the receptionist desk, cashier stations, and within secured areas. Dispensary agents will be trained on the specific location of panic buttons and the specific circumstances under which panic buttons should be used, including threatening conduct, criminal invasion, and other security emergencies. The General Manager will ensure that all panic buttons are properly functioning at all times. Alarms will be coordinated with local public officials.



Incident Reporting

Security personnel are required to work with the General Manager in reporting a relevant security incident to the local police and the Cannabis Control Commission, including but not limited to; Inventory discrepancies, diversion, theft, or loss of marijuana products, criminal activity or suspicious activity on the premise, unauthorized destruction of marijuana, any loss or unauthorized alteration of records related to marijuana, an alarm activation or other event that requires response by public safety personnel or security personnel of New Día, the failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours or any other breach of security.

In the event of an emergency, to notify authorities, management will do one of the following:

- Call 911.
- File in-person with the local police department.
- Submit a written report to the local police department

Security Personnel

At least one Security Officer will be on the premises at all times when customers are in the facility and for at least thirty minutes after closing. The following responsibilities will be required of the security officer:

- Patrol of all areas inside and outside of the dispensary, including parking areas and load dock areas.
- Identify hazards, problems, and potential issues of customer safety, and either resolve noted issues or report them to the proper authorities (e.g.. General Manager, Local Police Department)
- Prevent criminal activities, maintain the peace, and prevent the loitering of customers during business hours and for at least thirty minutes after closing
- Ensure no persons consume marijuana products on dispensary or adjacent property

8.0 APPENDIX

8.1. Letter of Support – South Worcester Neighborhood Improvement Corporation

South Worcester Neighborhood Improvement Corporation

47 Camp Street-Worcester, MA 01603 508-757-8344

August 14, 2018

Mr. Ross Bradshaw

New Dia

118 Cambridge Street

Worcester, MA 01603

Dear Mr. Bradshaw,

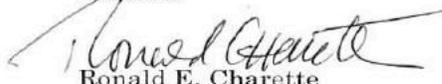
I want to thank you and Amanda of New Dia, for the excellent presentation on your proposed facility (to be located at 118 Cambridge Street) before the board of directors of the South Worcester Neighborhood Improvement Corporation last evening.

Your presentation on your plans for the business was well thought out.

After much discussion by the community members on the board of directors,

The board voted 17-1 in support of your proposal to locate a recreational marijuana retail store at 118 Cambridge Street.

On behalf of the board of directors, we wish you and New Dia well in your venture.

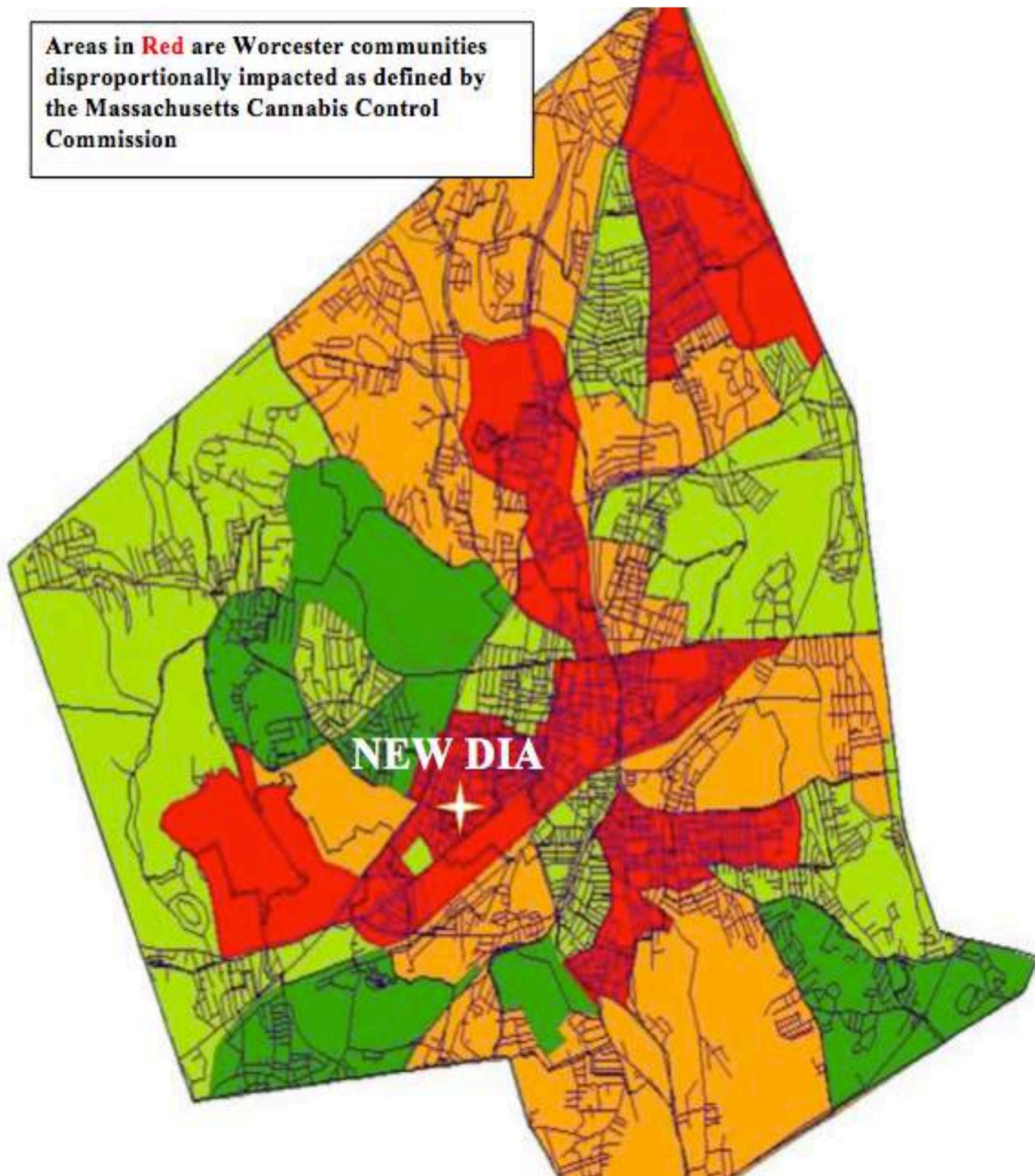


Ronald E. Charette

Executive Director

8.2. City of Worcester Map – Disproportionately Harmed Communities

Areas in **Red** are Worcester communities disproportionately impacted as defined by the Massachusetts Cannabis Control Commission



8.3 Daily Work Schedule

New Día Daily Work Schedule							
Week:							
	Mon	Tue	Wed	Thu	Fri	Sat	Sun
CEO							
Manager- FT	10:30-7:30pm	10:30-7:30p		10:30-7:30p	10:30-7:30p	10:30-7:30p	x
Manager- FT	10:30-7:30p (greeter)		10:30-7:30p	10:30-7:30p	10:30-7:30p		11:30-6:30
Manager- PT		10:30-7:30p (greeter)	10:30-7:30p (greeter)		10:30-7:30p (greeter)	10:30-7:30p (greeter)	
Sales Assoc					11-3pm		12p-1pm
Sales Assoc					2-7pm		12p-1pm
Sales Assoc	11-4pm		3-7pm			12-4pm	
Sales Assoc	3-7pm			11-4pm		2-7pm	
Sales Assoc		11-4pm		3-7pm			
Sales Assoc		3-7pm				11-3pm	
Sales Assoc			11-4pm				12-6 (greeter)
Security	10:30-7p	10:30-7p	10:30-7p	10:30-7p	10:30-7p		
Security						10:30-7p	11:30-6:30

8.4 Job Descriptions and Responsibilities

General Manager (Retail)

NEW DIA – Worcester, MA

Reports into: Director of Retail

Job Description

The Dispensary General Manager oversees day-to-day operations of their dispensary location. This includes but is not limited to managing all staff and ensuring successful compliant operations and high level customer service. The dispensary General Manager is responsible for creating the staffing schedule making sure the dispensary is properly staffed at every shift.

The Dispensary General Manager is responsible for communicating any policy changes to the staff and implementing directives from the Director of Retail immediately. The Dispensary General Manager is responsible for overseeing operations including but not limited to retail sales, inventory management, product intake, POS troubleshooting, education, onboarding of employees. This requires strong communication skills verbal and written.

Finally, this position is responsible for dispensary employees' strict adherence to laws and regulations concerning adult use cannabis put forth by the Massachusetts Cannabis Control Commission.

Responsibilities include:

Management of Dispensary Personnel

- Creates staffing schedule to ensure sufficient staffing for successful operations.
- Manages scheduling and shift times for optimal operations of the dispensary
- Works closely with NEW DIA's retail team to ensure proper product intake and organization
- Conducts regular meetings with dispensary personnel to communicate updates and responsibilities, gain feedback, and ensure successful operations and compliance
- Leads by example and reinforces high quality customer service
- Provides team with ongoing training and development
- Makes sure all staff members adhere to regulations set forth by the Massachusetts Cannabis Control Commission

Operations

- Reports daily sales
- Works closely with the Director of Retail to ensure successful implementation and follow through of compliant procedures regarding inventory
- Oversees all purchasing and check-in of products in the POS system and physical inventory
- Updates product display as needed to most accurately portray product availability to consumers
- Changes out inventory as needed, updates all menus online and in store, and communicates to staff all changes
- Oversees cash handling, provides change to drawers when needed and reconciles the cash drawers at close each night both physically and in the POS
- Ensures compliant proceedings in all dispensary operations

Effective Communication and Customer Service

- Communicates directives from the Director of Retail to the entire dispensary personnel when appropriate
- Continuously communicates product knowledge, changes, pricing and promotional sales to dispensary personnel
- Attends networking events and represents the brand in a respectful and appropriate fashion
- Supports patient care advocates and is available to provide conflict resolution when needed
- Communicates professionally and timely manner
- Ensures privacy of confidential and sensitive information

Assistant Manager

NEW DIA- Worcester, MA

Position - *Assistant Manager*

Reports to - *General Manager*

Job Description

The Assistant Manager will support the General Manager in all aspects of store operations. This includes coaching and developing the staff and providing leadership that will ensure the company's mission is delivered to every customer.

Responsibilities

Operations:

- Participate in the recruitment, training, development and success of all dispensary staff
- Ensure that work procedures are properly documented and all established SOPs are followed to maximize workflow
- Work closely with employees to ensure that all policies and procedures are understood and followed
- Perform end of month and end of year inventory audits and reconciliations
- Make sure all product is properly displayed and replenished
- Hold daily meetings with staff at the beginning of each shift to communicate updates and responsibilities
- Maintain store compliancy with all local, state, and federal regulations
- Handle all cash counting and change distribution in accurate manner
- Balance all employee drawers and daily sales reports
- Implement and oversee security, reporting and cash management procedures related to opening and closing of the dispensary
- Perform all daily opening and closing procedures
- Ensure proper product intake

Sales and Customer Service:

- Track all employee and store sales daily to meet daily goals
- Execute dispensary selling strategies through incentives, displays, internal and external marketing
- View sales reports and communicate with team to identify sales trends and potential stock requirements
- Provide high level customer service and assist with conflict resolution
- Proactively anticipate and maintain inventory needs

Sales Associate

NEW DIA- Worcester, MA

Job Description

The most critical role is to ensure outstanding customer service and cannabis knowledge within our adult use cannabis dispensary. The Sales Associate is the main point of contact for all customers at our dispensary. Outstanding communication skills, the ability to assess our customers' needs, and providing detailed information about our products is required.

Duties:

- Enthusiastically greets customers upon their arrival to the dispensary
- Provides high level boutique customer service that consistently exceeds customers' expectations.
- Accountable for accurately utilizing the Point of Sale system, inventory management and the MA state databases.
- Follows and executes compliant practices adhering in accordance with state regulations and NEW DIA's standard operating procedures.
- Promotes a work environment that is positive and customer-service oriented

Responsibilities:

- Maintains extensive knowledge of the cannabis industry and NEW DIA's products
- Engages with consumers to better understand the consumers' desired experience so that they can make informed product recommendations to best suit the needs of the customer
- Remains knowledgeable of NEW DIA's product inventory and is able to easily explain the benefits of the specific products and the methods of titration in a way that is understood by all customers
- Maintains a level of intellectual curiosity regarding the benefits of cannabis
- Answers customers questions and addresses concerns.
- Is knowledgeable about MA compliance and reporting regulations and how it relates to customer purchasing limits.
- Maintains a clean, safe, organized, and well merchandised store environment.
- Performs inventory checks with manager at beginning, end, and periodically throughout shift to ensure compliance and the prevention of diversion.
- Acknowledges any inventory issues and properly reports them to management.

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- Gates, Turnstiles & Storage rooms
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COMMUNICATION FAILURE

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- Secure Internet Monitoring

ENVIRONMENTAL DETECTION

- High/Low Temperature
- Furnace Fail
- HVAC Monitoring
- Gas Detection
- Carbon Monoxide Detection
- Flood Detection
- Specialized Critical Condition (freezer, cooler, etc.)
- Process Control Monitoring



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AND COMMUNICATIONS, INC

INTRUSION DETECTION

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- Interior Motion Sensing
- Glass Breakage Detection
- Full banking protection - Vaults & Safes
- UL certificate installations
- Department of Defense (DoD) and Secure Applications

DIGITAL VIDEO SYSTEMS

- Analog, digital & IP Cameras
- Remote Video Surveillance, Video Guard Tours & Video Alarm Verification from our Security Command Center
- Covert installations
- Digital Video Recorders for video storage with remote access via LAN or WAN
- Network video storage

EMERGENCY SERVICES

- ADA elevator phone monitoring
- Healthcare security
- Panic/Hold-up alarm response

FIRE ALARM SYSTEMS

- Smoke & Heat Detection
- System Design & Installation
- ADA Horn/Strobe light annunciation
- Sprinkler Monitoring
- Fire Alarm Testing & Inspection Services

Plan to Obtain Liability Insurance

New Día plans to obtain an insurance policy meeting the requirements set forth in 935 CMR 500.105 (10) through Corcoran & Havlin Insurance Group. Through this policy, New Día will obtain and maintain general liability coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually. The deductible for each policy shall be no higher than \$5,000 per occurrence.

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

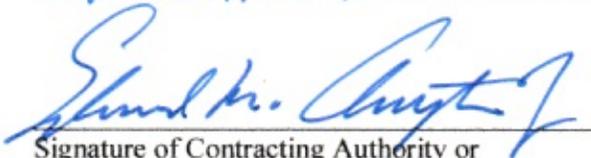
I, Ross Bradshaw, (*insert name*) certify as an authorized representative of New Dia, LLC (*insert name of applicant*) that the applicant has executed a host community agreement with the city of Worcester (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on April 24th 2019 (*insert date*).



Signature of Authorized Representative of Applicant

Host Community

I, Edward M. Augustus, Jr., (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for City of Worcester (*insert name of host community*) to certify that the applicant and City of Worcester (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on April 24, 2019 (*insert date*).



Signature of Contracting Authority or
Authorized Representative of Host Community

Edward M. Augustus, Jr.
City Manager

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, Boss Bradshaw, (insert name) attest as an authorized representative of New Dia, LLC (insert name of applicant) that the applicant has complied with the requirements of 935 CMR 500 and the guidance for licensed applicants on community outreach, as detailed below.

1. The Community Outreach Meeting was held on August 12, 2019 (insert date).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on August 3, 2019 (insert date), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document).
3. A copy of the meeting notice was also filed on August 1, 2019 (insert date) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on August 1, 2019 (insert date), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee).

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

6. Community members were permitted to ask questions and receive answers from representatives of the Marijuana Establishment.

22 Saturday, August 3, 2013 TELEGRAM & GAZETTE | telegram.com

WANTED GUIDE

WANTED GUIDE Auto Recycling. Buy any car or truck, even wrecked, regardless of year. Cash. Loans. Trade. We buy in any lot of state. Call Larry 508-763-7842.

WANTED GUIDE Buy any car or truck, even wrecked, regardless of year. Cash. Loans. Trade. We buy in any lot of state. Call Larry 508-763-7842.

Autos By Make

BUICK

2013 Buick Cascada. Excellent condition. Black. 1700 cc. Call Larry 508-763-7842.

CHEVROLET

Chevrolet Impala LTZ 2012. Silverstone metallic exterior. Excellent condition. Call Larry 508-763-7842.

FORD

Ford Focus 2008. 161. Top of the line model. Excellent condition. Call Larry 508-763-7842.

GMC

GMC Sierra 2500 HD. 2007. 6.6L Diesel. Excellent condition. Call Larry 508-763-7842.

KIA

2010 Kia Forte LX. 4 door. Excellent condition. Call Larry 508-763-7842.

LEXUS

Lexus ES 350 2006. Excellent condition. Call Larry 508-763-7842.

MAZDA

2007 Mazda3. Excellent condition. Call Larry 508-763-7842.

NISSAN

2007 Nissan Versa SL. Excellent condition. Call Larry 508-763-7842.

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C2 Saturday, August 3, 2019 TELEGRAM & GAZETTE | telegram.com

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 **Autos By Make**

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 16 Buick Cascada premium convertible, 6K original miles, triple black, MSRP 37K, like new \$18,000 774 229 0800

GENERAL

Truck Driver - CDL-A
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Please E-mail your resume to stelville@maverick-cm.com or fax to 508-721-2227

EQUIPMENT OPERATOR/LABORER/TRUCK DRIVER
Boylston is accepting applications for a full-time Equipment Operator/Laborer in our Highway Department. For more information please visit our website: <https://www.boylston-ma.gov/town-clerk/pages/employment-opportunities>. Interested candidates should apply at the address below, or forward a resume and a recent copy of their driving record to April Steward before August 23rd.
Town Administrator's Office, 221 Main St, Boylston, MA 01505, Email: asteward@boylston-ma.gov The Town of Boylston is LOC

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NOTICE OF COMMUNITY OUTREACH MEETING REGARDING AN ADULT-USE MARIJUANA ESTABLISHMENT PROPOSED BY NEW DIA, LLC

Notice is hereby given that a Community Outreach Meeting for New Dia, LLC's proposed Retail Marijuana establishment is scheduled for August 12, 2019 at 4:30pm at the Tatnuck Post NO 288, 570 Mill St, Worcester, MA 01602. The proposed Retail Marijuana establishment is anticipated to be located at 118 Cambridge St, Worcester, MA 01603.

Publication Date: 08/03/19

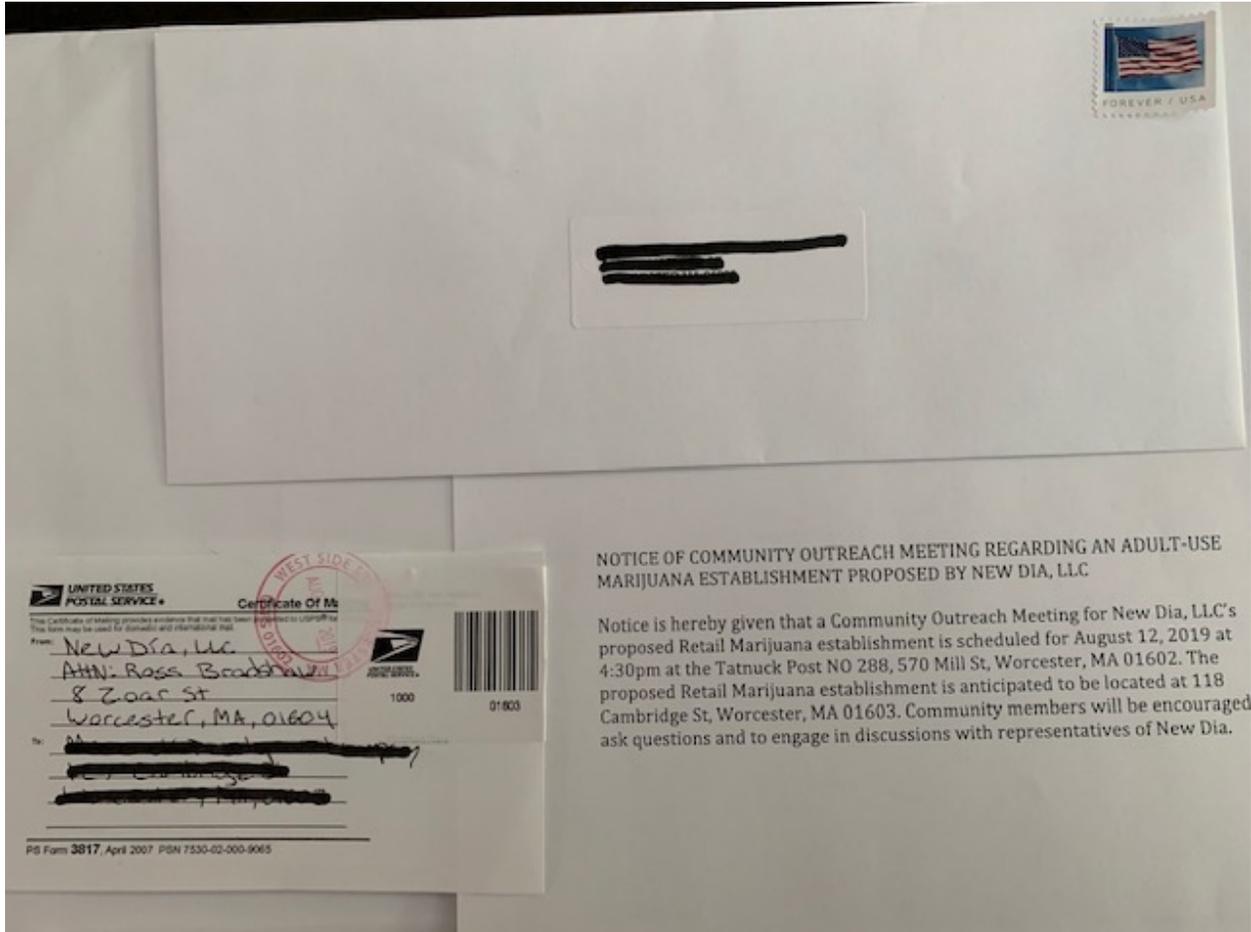
Attachment B

NOTICE OF COMMUNITY OUTREACH MEETING REGARDING AN ADULT-USE MARIJUANA ESTABLISHMENT PROPOSED BY NEW DIA, LLC

Notice is hereby given that a Community Outreach Meeting for New Dia, LLC's proposed Retail Marijuana establishment is scheduled for August 12, 2019 at 4:30pm at the Tatnuck Post NO 288, 570 Mill St, Worcester, MA 01602. The proposed Retail Marijuana establishment is anticipated to be located at 118 Cambridge St, Worcester, MA 01603. Community members will be encouraged to ask questions and to engage in discussions with representatives of New Dia.

Date: August 1, 2019

Attachment C



NOTICE OF COMMUNITY OUTREACH MEETING REGARDING AN ADULT-USE MARIJUANA ESTABLISHMENT PROPOSED BY NEW DIA, LLC

Notice is hereby given that a Community Outreach Meeting for New Dia, LLC's proposed Retail Marijuana establishment is scheduled for August 12, 2019 at 4:30pm at the Tatnuck Post NO 288, 570 Mill St, Worcester, MA 01602. The proposed Retail Marijuana establishment is anticipated to be located at 118 Cambridge St, Worcester, MA 01603. Community members will be encouraged ask questions and to engage in discussions with representatives of New Dia.

Plan to remain compliant with local zoning

New Día will remain compliant with local zoning by abiding the city of Worcester's ordinance imposing appropriate "time, place, and manner" restrictions on the operation of local marijuana establishments.

The city of Worcester has established local licensing requirements of adult-use marijuana establishments that New Día will fulfill. The first requirement is obtaining a Special Permit from the Worcester Planning Board. Requirements for obtaining a special permit include:

To obtain a Special Permit from the Planning Board:

Signed community host agreement + properly zoned marijuana establishment location → Present to the Planning Board → Planning Board approval of special permit

After obtaining a Special Permit from the Planning Board, and following approval of a provisional license from the Cannabis Control Commission, New Día will then be required to obtain a local license from the Worcester License Commission.

Requirements for obtaining a local license include:

To obtain a local license from the License Commission:

Special permit + provisional license from the Cannabis Control Commission → Present to the License Commission → License Commission approval of local license

In addition to completing the local licensing requirements outlined above, New Día will continue to monitor changes in local codes and zoning ordinances through communication with elected officials and local licensing boards.



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$500.00

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

Annual Report
 (General Laws, Chapter)

Identification Number: 001331653

Annual Report Filing Year: 2019

1.a. Exact name of the limited liability company: NEW DIA, LLC

1.b. The exact name of the limited liability company as amended, is: NEW DIA, LLC

2a. Location of its principal office:
 No. and Street: 8 ZOAR ST
 City or Town: WORCESTER State: MA Zip: 01604 Country: USA

2b. Street address of the office in the Commonwealth at which the records will be maintained:
 No. and Street: 8 ZOAR ST
 City or Town: WORCESTER State: MA Zip: 01604 Country: USA

3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:
RETAIL SALES AND ANY LAWFUL BUSINESS FOR WHICH A LIMITED LIABILITY COMPANY MAY BE ORGANIZED UNDER THE LAWS OF THE COMMONWEALTH OF MASSACHUSETTS.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:
 Name: ROSS BRADSHAW
 No. and Street: 8 ZOAR ST
 City or Town: WORCESTER State: MA Zip: 01604 Country: USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	ROSS BRADSHAW	8 ZOAR ST WORCESTER, MA 01604 USA

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

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

--

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	ROSS BRADSHAW	8 ZOAR ST WORCESTER, MA 01604 USA

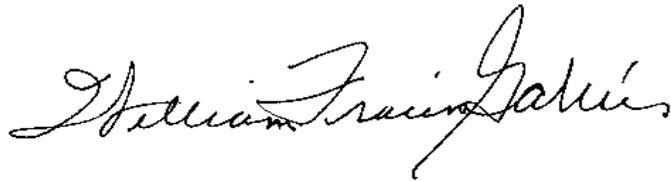
9. Additional matters:

**SIGNED UNDER THE PENALTIES OF PERJURY, this 6 Day of June, 2019,
ROSS BRADSHAW , Signature of Authorized Signatory.**

THE COMMONWEALTH OF MASSACHUSETTS

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

June 06, 2019 11:41 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

**BYLAWS
OF
NEW DIA, LLC**

**ARTICLE I
SHAREHOLDERS**

Section 1. Annual Meeting. An annual meeting shall be held once each calendar year for the purpose of electing directors and for the transaction of such other business as may properly come before the meeting. The annual meeting shall be held at the time and place designated by the Board of Directors from time to time.

Section 2. Special Meetings. Special meetings of the shareholders may be requested by the President, the Board of Directors, or the holders of a majority of the outstanding voting shares.

Section 3. Notice. Written notice of all shareholder meetings, whether regular or special meetings, shall be provided under this section or as otherwise required by law. The Notice shall state the place, date, and hour of meeting, and if for a special meeting, the purpose of the meeting. Such notice shall be mailed to all shareholders of record at the address shown on the corporate books, at least 10 days prior to the meeting. Such notice shall be deemed effective when deposited in ordinary U.S. mail, properly addressed, with postage prepaid.

Section 4. Place of Meeting. Shareholders' meetings shall be held at the corporation's principal place of business unless otherwise stated in the notice. Shareholders of any class or series may participate in any meeting of shareholders by means of remote communication to the extent the Board of Directors authorizes such participation for such class or series. Participation by means of remote communication shall be subject to such guidelines and procedures as the Board of Directors adopts. Shareholders participating in a shareholders' meeting by means of remote communication shall be deemed present and may vote at such a meeting if the corporation has implemented reasonable measures: (1) to verify that each person participating remotely is a shareholder, and (2) to provide such shareholders a reasonable opportunity to participate in the meeting and to vote on matters submitted to the shareholders, including an opportunity to communicate, and to read or hear the proceedings of the meeting, substantially concurrent with such proceedings.

Section 5. Quorum. A majority of the outstanding voting shares, whether represented in person or by proxy, shall constitute a quorum at a shareholders' meeting. In the absence of a quorum, a majority of the represented shares may adjourn the meeting to another time without further notice. If a quorum is represented at an adjourned meeting, any business may be transacted that might have been transacted at the meeting as originally scheduled. The shareholders present at a meeting represented by a quorum may continue to transact business until adjournment, even if the withdrawal of some shareholders results in representation of less than a quorum.

Section 6. Informal Action. Any action required to be taken, or which may be taken, at a shareholders meeting, may be taken without a meeting and without prior notice if a consent in writing, setting forth the action so taken, is signed by the shareholders who own all of the shares entitled to vote with respect to the subject matter of the vote.

ARTICLE II DIRECTORS

Section 1. Number of Directors. The corporation shall be managed by a Board of Directors consisting of 3 director(s).

Section 2. Election and Term of Office. The directors shall be elected at the annual shareholders' meeting. Each director shall serve a term of 5 year(s), or until a successor has been elected and qualified.

Section 3. Quorum. A majority of directors shall constitute a quorum.

Section 4. Adverse Interest. In the determination of a quorum of the directors, or in voting, the disclosed adverse interest of a director shall not disqualify the director or invalidate his or her vote.

Section 5. Regular Meeting. An annual meeting shall be held, without notice, immediately following and at the same place as the annual meeting of the shareholders. The Board of Directors may provide, by resolution, for additional regular meetings without notice other than the notice provided by the resolution.

Section 6. Special Meeting. Special meetings may be requested by the President, Vice-President, Secretary, or any two directors by providing five days' written notice by ordinary United States mail, effective when mailed. Minutes of the meeting shall be sent to the Board of Directors within two weeks after the meeting.

Section 7. Procedures. The vote of a majority of the directors present at a properly called meeting at which a quorum is present shall be the act of the Board of Directors, unless the vote of a greater number is required by law or by these by-laws for a particular resolution. A director of the corporation who is present at a meeting of the Board of Directors at which action on any corporate matter is taken shall be presumed to have assented to the action taken unless their dissent shall be entered in the minutes of the meeting. The Board shall keep written minutes of its proceedings in its permanent records.

If authorized by the governing body, any requirement of a written ballot shall be satisfied by a ballot submitted by electronic transmission, provided that any such electronic transmission must either set forth or be submitted with information from which it can be determined that the electronic transmission was authorized by the member or proxy holder.

Section 8. Informal Action. Any action required to be taken at a meeting of directors, or any action which may be taken at a meeting of directors or of a committee of directors, may be taken

without a meeting if a consent in writing setting forth the action so taken, is signed by all of the directors or all of the members of the committee of directors, as the case may be.

Section 9. Removal / Vacancies. A director shall be subject to removal, with or without cause, at a meeting of the shareholders called for that purpose. Any vacancy that occurs on the Board of Directors, whether by death, resignation, removal or any other cause, may be filled by the remaining directors. A director elected to fill a vacancy shall serve the remaining term of his or her predecessor, or until a successor has been elected and qualified.

Section 10. Resignation. Any director may resign effective upon giving written notice to the chairperson of the board, the president, the secretary or the Board of Directors of the corporation, unless the notice specifies a later time for the effectiveness of such resignation. If the resignation is effective at a future time, a successor may be elected to take office when the resignation becomes effective.

Section 11. Committees. To the extent permitted by law, the Board of Directors may appoint from its members a committee or committees, temporary or permanent, and designate the duties, powers and authorities of such committees.

ARTICLE III OFFICERS

Section 1. Number of Officers. The officers of the corporation shall be a President, a Treasurer, and a Secretary.

President/Chairman. The President shall be the chief executive officer and shall preside at all meetings of the Board of Directors and its Executive Committee, if such a committee is created by the Board.

Secretary. The Secretary shall give notice of all meetings of the Board of Directors and Executive Committee, if any, shall keep an accurate list of the directors, and shall have the authority to certify any records, or copies of records, as the official records of the corporation. The Secretary shall maintain the minutes of the Board of Directors' meetings and all committee meetings.

Treasurer/CFO. The Treasurer shall be responsible for conducting the financial affairs of the corporation as directed and authorized by the Board of Directors and Executive Committee, if any, and shall make reports of the corporation's finances as required, but no less often than at each meeting of the Board of Directors and Executive Committee.

Section 2. Election and Term of Office. The officers shall be elected annually by the Board of Directors at the first meeting of the Board of Directors, immediately following the annual meeting of the shareholders. Each officer shall serve a one year term or until a successor has been elected and qualified.

Section 3. Removal or Vacancy. The Board of Directors shall have the power to remove an officer or agent of the corporation. Any vacancy that occurs for any reason may be filled by the Board of Directors.

ARTICLE IV CORPORATE SEAL, EXECUTION OF INSTRUMENTS

The corporation shall not have a corporate seal. All instruments that are executed on behalf of the corporation which are acknowledged and which affect an interest in real estate shall be executed by the President or any Vice-President and the Secretary or Treasurer. All other instruments executed by the corporation, including a release of mortgage or lien, may be executed by the President or any Vice-President. Notwithstanding the preceding provisions of this section, any written instrument may be executed by any officer(s) or agent(s) that are specifically designated by resolution of the Board of Directors.

ARTICLE V AMENDMENT TO BYLAWS

The bylaws may be amended, altered, or repealed by the Board of Directors or the shareholders by a majority of a quorum vote at any regular or special meeting; provided however, that the shareholders may from time to time specify particular provisions of the bylaws which shall not be amended or repealed by the Board of Directors.

ARTICLE VI INDEMNIFICATION

Any director or officer who is involved in litigation by reason of his or her position as a director or officer of this corporation shall be indemnified and held harmless by the corporation to the fullest extent authorized by law as it now exists or may subsequently be amended (but, in the case of any such amendment, only to the extent that such amendment permits the corporation to provide broader indemnification rights).

ARTICLE VII STOCK CERTIFICATES

The corporation may issue shares of the corporation's stock without certificates. Within a reasonable time after the issue or transfer of shares without certificates, the corporation shall send the shareholder a written statement of the information that is required by law to be on the certificates. Upon written request to the corporate secretary by a holder of such shares, the secretary shall provide a certificate in the form prescribed by the directors.

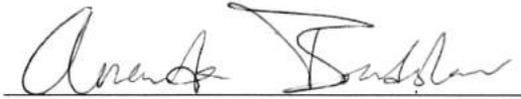
ARTICLE VIII DISSOLUTION

The corporation may be dissolved only with authorization of its Board of Directors given at a

special meeting called for that purpose, and with the subsequent approval by no less than two-thirds (2/3) vote of the members.

Certification

Amanda Bradshaw, Secretary of New Dia, LLC hereby certifies that the foregoing is a true and correct copy of the bylaws of the above-named corporation, duly adopted by the initial Board of Directors on August 06, 2018.

A handwritten signature in cursive script, appearing to read "Amanda Bradshaw", is written over a horizontal line.

Amanda Bradshaw, Secretary



mass.gov/dor

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



NEW DIA, LLC
8 ZOAR ST
WORCESTER MA 01604-3573

000020

Why did I receive this notice?

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

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

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

What if I have questions?

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 8:30 a.m. to 4:30 p.m..

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau



William Francis Galvin
Secretary of the
Commonwealth

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

August 14 , 2019

TO WHOM IT MAY CONCERN:

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

NEW DIA, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **June 10, 2018.**

I further certify that said Limited Liability Company has filed all annual reports due and paid all fees with respect to such reports; that said Limited Liability Company has not filed a certificate of cancellation; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; and that said Limited Liability Company is in good standing with this office.

I also certify that the names of all managers listed in the most recent filing are: **ROSS BRADSHAW**

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

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



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

Dispensing procedures

Dispensary agents will adhere to the following procedure when dispensing marijuana products to customers. Marijuana products containing nicotine or alcohol will be prohibited.

Step One: Upon entry to the New Día dispensary, customers must first check in with a dispensary agent at reception before assessing the dispensary floor. The dispensary agent will request that the customer provide verification that the individual is 21 years of age or older, by valid proof of identification. Acceptable proof of identification will include an unexpired government-issued photo ID card with name, photograph, and date of birth. This will be limited to one of the following: Driver's License, Government-issued ID card, Military ID card, or Passport.

The dispensary agent will first verify the date of birth on the form of identification provided, and then compare the form of identification to the person providing them. If the form of identification does not verify that the individual is 21 years of age or older, or the form of identification does not appear to be a form of identification that belongs to the person providing them, the dispensary agent will notify the security officer on duty and the individual will be guided off the New Día premise.

Customers with valid identification will be directed to the dispensary floor where they will be assisted with selecting products.

Step Two: After selected products for purchase, the dispensary agent will verify the amount of marijuana the customer is purchasing does not exceed the limit of one ounce of marijuana or five grams of marijuana concentrate to a customer per transaction. If the amount of marijuana the customer is requesting would cause the customer to exceed the transaction limit, the dispensary agent will deny the sale of marijuana to that person to the degree that any sale would cause the customer to exceed the limit.

Step Three: The dispensary agent will record the sales transaction utilizing a point-of-sale (POS) system approved by the Commission. At a minimum, the approved POS system will capture the following:

- Amount of marijuana dispensed
- The date and time the marijuana was dispensed
- A description of the type of marijuana product dispensed
- The identification number of the dispensary agent

- The identification number of the registered product manufacturer or cultivator that produced the marijuana product
- The marijuana product retail price and cost of goods

Step Four: The dispensary agent will offer the customer educational materials about the products purchased. Educational materials will 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. Education materials provided by the dispensary agent will include at least the following:

- 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;
- A warning that when under the influence of marijuana, driving is prohibited and machinery should not be operated;
- 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;
- Materials offered to consumers to enable them to track the strains used and their associated effects;
- Information describing proper dosage and titration for different routes of administration. Emphasis will be on using the smallest amount possible to achieve the desired effect and the potential impact of potency;
- Content regarding tolerance, dependence, and withdrawal;
- Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs within the area;
- A statement that consumers may not sell marijuana to any other individual;
- Information regarding penalties for possession or distribution of marijuana in violation of Massachusetts law;
- Any other information required by the Commission.

Step Five: If at any time during any interaction with an individual attempting to purchase marijuana the dispensary agent determines that the individual appears

to be impaired or abusing marijuana, the dispensary agent is permitted to deny any sale of marijuana to that person. In addition a dispensary agent may refuse to sell marijuana products to a consumer if it is believed that the consumer or public would be put at risk. In any denial of sale event, the dispensary agent will complete a Denial of Sale Form, which will be then reviewed by the General Manager and retained for record retention.

Step Six: At the conclusion of the sales process, customers will receive the product in an opaque child resistant bad and exit the building to the entrance parking area.

Point-of-Sales (POS) Systems

New Día will utilize a state approved POS system that integrates real-time sales, inventory, and financial bookkeeping that has been approved by the Commission, in consultation with DOR. New Día will not utilize software or other methods to manipulate or alter sales data. New Día shall conduct a monthly analysis of equipment to determine that no software has been installed that could be utilized to manipulate or alter sales data. Records of the monthly analysis will be documented and retained. If it is made aware that software or other methods have been installed to manipulate or altar sales data: it shall immediately disclose the information to the CCC, cooperate in any investigation, and take such other action as directed.

Diversity Plan

New Día is not only an economic empowerment applicant but also a majority of current owners are of African decent, a majority of current owners have previously resided in areas of disproportionate impact, and 25% of current owners are women. New Día will be a diversity trailblazer in the Massachusetts cannabis industry by continuously striving to maintain our diversified leadership and consistently promoting equity amongst our employees.

With regarding to hiring staff, New Día will host annual job fairs specifically focused on recruiting minorities, women, veterans, people with disabilities, and LGBTQ+. New Día will achieve its diversity goals by local recruitment efforts which will include news paper advertisements, online job postings, and by word of mouth in the South Worcester community.

Specific goals, programs, and metrics we will use to analyze our overall commitment to diversity includes:

- ***Employment***

- Goal: 75% percentage of staff shall be minorities, women, veterans, and persons with disabilities
 - Program: When hiring New Día shall post advertisements in the local newspaper, The Telegram & Gazette, stating that New Día is specifically looking to employ Worcester residents who are minorities, women, veterans, and persons with disabilities.
 - Metric: New Día will count the number of individuals hired who are minorities, women, veterans, and persons with disabilities. The number will be assessed from the total number of individuals hired to ensure 75% fall within this goal. The progress of our program will be documented upon renewal of our provisional license.

- ***Technical Assistance***

- Goal: Host 1 annual free workshop within the community to assist minorities, women, veterans, persons with disabilities, and LGBTQ+ with creating resumes, cover letters, and references for entering the adult-use marijuana industry.
 - Program: New Día will post flyers and update our company website and social media to inform the public of upcoming workshops. Information included in notifications will include the time, location, and workshop goals which include assisting individuals from diverse demographics enter into the adult-use marijuana industry.
 - Metric: New Día will count the number of annual workshops that have been held to specifically foster diversity within the industry. The progress of our program will be documented upon renewal of our provisional license.
- Goal: Assist 3 individuals that are either a minority, woman, veteran, or a person with disabilities, successfully apply for the Social Equity Program.
 - Program: New Día will distribute internal workplace newsletters and customer notifications throughout the year that inform and encourage individuals that qualify for the state Social Equity program to ask management for application assistance.
 - Metric: New Día will count, on an annual basis, the number of individuals that have applied to the Social Equity program with the assistance of our establishment. The progress of our program will be documented upon renewal of our provisional license.

New Día's diversity plan will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments. In addition, any actions taken, or programs instituted will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

Maintenance of financial records

New Día will maintain financial records as required by 935 CMR 500.105. All financial records will be retained for at least the minimum amount of time required by law. New Día shall comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding record keeping requirements. New Día's financial records will be made available for inspection by the cannabis control commission and the local licensing authority, upon request. New Día shall adopt separate accounting practices at the point of sale for marijuana and non-marijuana sales.

New Día will utilize a state approved POS system that integrates real-time sales, inventory, and financial bookkeeping. New Día will not utilize software or other methods to manipulate or alter sales data. New Día shall conduct a monthly analysis of equipment to determine that no software has been installed that could be utilized to manipulate or alter sales data. Records of the monthly analysis will be documented and retained. If it is made aware that software or other methods have been installed to manipulate or alter sales data: it shall immediately disclose the information to the CCC, cooperate in any investigation, and take such other action as directed.

Financial Records will be stored electronically and access to records, via POS system or otherwise, will be password protected and require user authentication. Each entry by an individual user will be timed and dated. Any paper records will be scanned and stored in a similar manner. Hard copies will be locked in a limited access area in the Managers office.

Business Records

New Día will maintain the following business records:

- Assets & Liabilities
- Monetary transactions
- Books of account
- Sales records
- Salary and wages paid to each employee

Personnel policies including background checks

Employee actions and conduct will be exemplified in strict employee policies and procedures. To start, every employee candidate will undergo multiple interviews including at least one with our General Manager and CEO. Part of the interviewing process will include careful pre-screening of candidates for compliance with state regulations prior to hiring. All employees are required to have appropriate skills to effectively carry out assigned duties and comply with local and state regulatory requirements. Once having passed all required internal interviews and state background checks, onboarding of staff will include completion of orientation. During company orientation new hires will be provided with an Employee Handbook containing information about the policies and procedures of New Día, as well as the opportunities and benefits available to employees.

The Employee Handbook will contain company personnel policies, including but not limited to: Company Policies including rules of conduct, dress code, alcohol and substance abuse, disciplinary actions, company confidentiality, conflict of interest, ethics, discrimination and harassment, social media, emergency procedures, effective interaction with law enforcement, work hours, scheduled time off, performance evaluations, and work related injuries. Leave Policies will include holidays, vacation, personal and sick days, maternity/paternity, military leave, and jury duty.

New hire orientation will also cover a thorough review of state and local marijuana regulations including responsible vendor training. Training shall be tailored to the roles and responsibilities of the job function of each dispensary agent. Upon completion of orientation and job related training, each new hire will be required to sign a statement stating that the employee has read and understands applicable company policies and procedures.

Personnel Records

Personnel records for all employees and volunteers, including organizational charts, will include job descriptions, employee contacts, background checks, references, training records, performance evaluations, disciplinary actions, and any other employee records required under 935 CMR 500.105(9) will be maintained on site in a secured area accessible only by authorized personnel. All personnel records will be retained in accordance with the record keeping requirements of 935 CMR 500.000 and will be maintained for at least 12 months after termination. In accordance with 935 CMR 500.105 policies include the immediate dismissal of any agent who has diverted marijuana, engaged in unsafe practices, or been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor.

Staffing Plan and Records

All staffing plans and records shall be in compliance with 935 CMR 500.105 (9) and 935 CMR 500.105 (1). Recruitment of new employee will be conducted via traditional job opportunity websites, postings to the company website, and word of mouth. New Día's staffing plan will ensure that the appropriate number of roles and positions are filled based on accessible business hours of 9am – 10pm, seven days a week. In addition, the staffing plan will ensure employees with the right skill set are in the appropriate position.

Any change or update to the policies will be communicated to employees and their review and acknowledgment will be tracked and logged. Each year, an annual re-certification will be administered by New Día, where personnel policies will be reviewed and acknowledged in writing.

Qualifications and training

Employee Qualifications

All New Día employees and volunteers will be required to be at least 21 years of age and suitable for employment in accordance with *935 CMR 500.802: Suitability Standard for Registration as a Marijuana Establishment Agent*.

Employee Training

All New Día employees will be required to complete training that will include review of employee work handbook, completion of relevant reading materials, and attending presentations by qualified professionals, and hands-on training. Employees will be required to complete training on job specific duties prior to performing job functions and a minimum of eight hours of on-going annual training. In addition, training will consist of:

- **Compliance.** Compliance training will cover all municipal and state laws requirements relating to retail marijuana establishments. Other topics may include the rules and regulations of the dispensary, sexual harassment training, effective interaction with law enforcement personnel, and the rights and responsibilities of marijuana customers.
- **Dispensing.** Staff will be trained in customer care and retail sales. The focus will be on assisting customers in making appropriate decisions about how to choose the type of product that is right for them. Staff will be provided with ongoing training in product information as well as general service philosophy.
- **Safety.** In addition to its focus on safety, security training will include acceptable identification and counterfeit detection, warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution techniques, and diversion detection techniques.
- **Substance Abuse.** Employees will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependence, and withdrawal. They will also receive training on the differing strengths of marijuana strains, products and the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, non-prescription drugs, and supplements.

All current owners, managers, and employees shall complete the Responsible Vendor Program after July 1, 2019 or when available. In addition, all new employees shall complete the Responsible Vendor Program within 90 days of being hired. Responsible Vendor Program documentation will be retained for four years.

Anticipated Positions and Qualifications

- **General Manager**
 - Responsibilities - oversees day-to-day operations dispensary location. This includes but is not limited to managing all staff and ensuring successful compliant operations with regulations and high level customer service.
 - Qualifications – At least 21 years of age, previous management and retail experience, excellent communication and customer service skills, computer operating skills, ability to pass all state required background checks, knowledge of and experience with POS systems and cash handling.

- **Assistant Manager**
 - Responsibilities - support the General Manager in all aspects of store operations. This includes coaching, developing the staff, and compliance with applicable rules and regulations.
 - Qualifications – At least 21 years of age, management experience desired, excellent communication and customer service skills, computer operating skills, ability to pass all state required background checks, knowledge of and experience with POS systems and cash handling.

- **Sales Associate**
 - Responsibilities - ensure outstanding customer service and consumer education regarding Massachusetts laws, marijuana products, and responsible marijuana consumption.
 - Qualifications – At least 21 years of age, high school diploma or GED, ability to pass all state required background checks, ability to handle confidential and sensitive information.

- **Security Personnel**
 - Responsibilities - ensure a safe and secure environment for staff, customers, and surrounding community.
 - Qualifications – At least 21 years of age, previous security or loss prevention experience desired, high school diploma or GED, ability to pass all state required background checks, ability to handle confidential and sensitive information.

Quality control and testing

New Día will only acquire prepackaged marijuana products from state licensed marijuana product manufactures and cultivation facilities. New Día will ensure all products received from the originating establishment have been tested by an Independent Testing Laboratory in accordance with 935 CRM 500.160. Only the leaves and flowers of the female marijuana plant shall be processed in a safe and sanitary manner as prescribed below:

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

We will require testing results be displayed on all prepackaged marijuana products that are acquired. The Cannabis Control Commission shall be notified within 72 hours of any laboratory testing results indicating contamination if contamination cannot be remediated and disposal of the production batch is necessary.

In addition, New Día will perform the following for all product manufactures and cultivation manufactures that supply products:

- Determine the standard operating procedures & good manufacturing practices of suppliers
- Develop knowledge of suppliers compliance with regulatory standards regarding the processing of edibles and infused products, including use of the methods, equipment, solvents, gases and mediums
- Ascertain the identity of the Testing Laboratory or laboratories with which suppliers do business;
- Conduct an on-site review of the supplier premises
- Conduct its own random testing to validate results provided by its suppliers.

New Día employees whose job includes contact with marijuana is subject to the requirements for food handlers specified in 105 CMR 300.000. In addition, any employee working in direct contact with marijuana shall conform to sanitary practices while on duty, including maintaining adequate personal cleanliness and washing hands appropriately.

The New Día marijuana establishment facility will ensure the following conditions at all times:

- Hand-washing facilities are located in production areas
- Sufficient space is provided for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations
- Litter and waste shall be properly removed so as to minimize the development of odor and the potential for the waste attracting and harboring pests
- Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair
- All contact surfaces, shall be maintained, cleaned, and sanitized as frequently as necessary to protect against contamination
- All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana
- Water supply shall be sufficient for necessary operations
- Plumbing shall be of adequate size and design and maintained to carry sufficient quantities of water to required locations throughout the establishment
- The establishment shall provide employees with adequate, readily accessible toilet facilities
- Storage and transportation of finished products shall be under conditions that will protect against physical, chemical, and microbial contamination

Record keeping procedures

New Día will implement recordkeeping policies and procedures as required by 935 CMR 500.105, including appropriate tracking, storage, retention and confidentiality. In addition, New Día will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000. At a minimum, New Día will maintain the following records:

- Operating procedures including security measures, storage of marijuana, recordkeeping, quality control, staff planning, emergency procedures, cash handling protocols and policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- Inventory records as required by 935 CMR 500.105(8)
- Seed-to-sale tracking records for all marijuana products as required by 935 CMR 500.105(8)(e);
- Personnel records including policies and procedures, job descriptions, organizational charts, employee contracts, reference checks, completed training, performance evaluations, disciplinary actions, and performed background checks
- Business records (manual or computerized) of assets and liabilities, monetary transactions, books of accounts, sales records including the quantity, form, and cost of marijuana products; and Salary and wages information, stipend paid to each board members, and any executive compensation of value paid to any individual affiliated with a Marijuana Establishment.
- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information
- Waste disposal records as required under 935 CMR 500.105(12)

All systems accessed by dispensary agents will be password protected. In addition, each authorized dispensary agent will be assigned a unique username and access code. A record will be kept of all logins and records created or edited during login time. New Día will rely on electronic record keeping whenever possible, and ensure data is backed up at regular intervals to prevent any loss of information. Any paper documents that require retention will be stored in a locked cabinet with access limited to authorized personnel. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

New Día shall make records available for inspection by the Commission and any other applicable licensing authority.

Restricting Access to age 21 and older

Upon entry to the New Día dispensary, customers must first check in with a dispensary agent at reception before assessing the dispensary floor. The dispensary agent will request that the customer provide verification that the individual is 21 years of age or older, by valid proof of identification. Acceptable proof of identification will include an unexpired government-issued photo ID card with name, photograph, and date of birth. This will be limited to one of the following: Driver's License, Government-issued ID card, Military ID card, or Passport.

The dispensary agent will first verify the validity and date of birth on the form of identification by utilizing an approved ID scanning technology system and then by comparison of the form of identification to the person providing them. If the form of identification does not verify that the individual is 21 years of age or older, or the form of identification does not appear to be a form of identification that belongs to the person providing them, the dispensary agent will notify the Security Officer on duty and the individual will be guided off the New Día premise.

Positive Impact Plan

As an economic empowerment applicant that will be operating in an area of disproportionate impact (Worcester - *Census Tract 7312.04*), New Día has implemented methods and plans to positively impact the harmed communities of Worcester in virtually every aspect of our business operations. New Día will be a state-wide example of how to best operate as a successful and responsible marijuana retailer, while at the same time empowering and enriching the communities we serve. Our company mission is to provide employment, education, and opportunity to communities most harmed by marijuana prohibition by providing a safe and secure means of access to regulated marijuana within the city of Worcester. New Día will provide benefits to the community far beyond just providing safe access to marijuana. A summary of our plans to positively impact our disproportionate area of impact, and the surrounding community includes;

- Investment in Community Revitalization
 - Goal: Hosting at least 4 company sponsored community cleanups each year in South Worcester.
 - Program: New Día will post flyers and update our company website and social media to inform employees, customers, and community members of community cleanup events at least 2 weeks in advance.
 - Metric: New Día will count the number of annual company sponsored community cleanups that have been held. The progress of our program will be documented upon renewal of our provisional license.
 - Goal: Improving the security profile of our surrounding community through security systems and company security procedures
 - Program: New Día shall implement surveillance systems in the establishment's exterior parking lot and alley way (in compliance with CCC regulations) to ensure there is no illicit activities. Any identified illicit activities will be immediately reported to the Worcester Police Department.
 - Metric: New Día will maintain an annual record of illicit activities captured via surveillance systems and the appropriate action taken to report such findings. The progress of our program will be documented upon renewal

of our provisional license.

- Educational Workshops
 - Goal: Host 1 annual free educational workshops within the South Worcester community to educate and inform residents, parents, coaches, and other community stakeholders of responsible marijuana use, the legalities of recreational marijuana, and equity mandates with state regulations.
 - Program: New Día will post flyers and update our company website and social media to inform the public of upcoming educational workshops. Information included in notifications will include the time, location, speakers, and specific topics to be discussed.
 - Metric: New Día will count the number of annual educational workshops that have been held. The progress of our program will be documented upon renewal of our provisional license.

- Assistance to individuals seeking employment
 - Goal: Host 1 annual free resume workshop within the South Worcester community to assist individuals (21 and over) with creating resumes for employment.
 - Program: New Día will post flyers and update our company website and social media to inform the public of upcoming resume workshops. Information included in notifications will include the time, location, and workshop goals.
 - Metric: New Día will count the number of annual resume workshops that have been held. The progress of our program will be documented upon renewal of our provisional license.

- Employment for community residents
 - Goal: Maintain at least 75% of employment from people residing in Worcester areas disproportionately impacted.
 - Program: When hiring New Día shall post advertisements in the local newspaper, The Telegram & Gazette, stating that New Día is specifically looking for Worcester residents who reside in specific communities for employment.
 - Metric: New Día will count the number of individuals hired who reside in areas of disproportionate impact. The number

will be assessed from the total number of individuals hired to ensure 75% fall within this goal.

New Día's positive impact plan will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments. In addition, any actions taken, or programs instituted will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.