



Massachusetts Cannabis Control Commission

Public Record Request

Marijuana Cultivator

General Information:

License Number: MC281611

Original Issued Date: N/A

Issued Date: N/A

Expiration Date: N/A

Payment Received: \$0 Payment Required: \$20000

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: TetraMed LLC

Federal Tax Identification Number EIN/TIN: [REDACTED]

Phone Number:

Email Address: mb.tetramed@gmail.com

401-919-7202

Business Address 1: 30 Powder Point Avenue

Business Address 2:

Business City: Duxbury

Business State: MA

Business Zip Code: 02332

Mailing Address 1: 30 Powder Point Avenue

Mailing Address 2:

Mailing City: Duxbury

Mailing State: MA

Mailing Zip Code: 02332

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 96.5 Percentage Of Control: 96.5
Role: Executive / Officer Other Role:
First Name: Michael Middle Name: [REDACTED] Last Name: Brickey Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 2

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

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 2.25 Percentage Of Control: 2.25
Role: Other (specify) Other Role: Head of Cultivation
First Name: James Middle Name: [REDACTED] Last Name: Delbonis Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: 1.25 Percentage Of Control: 1.25
Role: Executive / Officer Other Role:
First Name: Eric Middle Name: Last Name: Canestrari Suffix:
Gender: Male User Defined Gender:
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control: Percentage of Ownership:
Entity Legal Name: The Winmill Group Entity DBA: DBA
City: City:
Entity Description: Security Services - Independent Contractor
Foreign Subsidiary Narrative:
Entity Phone: 202-441-9348 Entity Email: Entity Website: www.winmillgroup.com
ryan.winmill@winmillgroup.com
Entity Address 1: 10307 Saddleview Court Entity Address 2:
Entity City: Vienna Entity State: VA Entity Zip Code: 22182

Entity Mailing Address 1: 10307 Saddleview Court

Entity Mailing Address 2:

Entity Mailing City: Vienna

Entity Mailing State: VA

Entity Mailing Zip Code:

22182

Relationship Description: The Winmill Group, LLC is a security consulting firm. TetraMed has engaged the services of The Winmill Group to provide security services for operations and compliance.

CLOSE ASSOCIATES AND MEMBERS

Close Associates or Member 1

First Name: Michael

Middle Name: [REDACTED]

Last Name: Brickey

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Chief Executive Officer

Close Associates or Member 2

First Name: Matthew

Middle Name: Lee

Last Name: Elam

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Mr. Elam will be the Chief Operating Officer and General Manager

Close Associates or Member 3

First Name: Eric

Middle Name:

Last Name: Canestrari

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Chief Compliance Officer

Close Associates or Member 4

First Name: James

Middle Name: [REDACTED]

Last Name: Delbonis

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Head of Cultivation

Close Associates or Member 5

First Name: Ryan

Middle Name: [REDACTED]

Last Name: Winmill

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Ryan Winmill is the President of The Winmill Group, LLC a security consulting firm. TetraMed has engaged the services of The Winmill Group to provide security services for operations and compliance.

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: TetraMed LLC

Entity DBA:

Email: mb.glassco@gmail.com

Phone: 401-919-7202

Address 1: 30 Powder Point Ave

Address 2:

City: Duxbury

State: MA

Zip Code: 02332

Types of Capital: Monetary/Equity Other Type of Capital: Total Value of Capital Provided: \$319000 Percentage of Initial Capital: 2

Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 85 Winter Street

Establishment Address 2:

Establishment City: Gardner

Establishment Zip Code: 01440

Approximate square footage of the Establishment: 55000

How many abutters does this property have?: 41

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

Cultivation Tier: Tier 04: 20,001 to 30,000 sq. ft

Cultivation Environment: Indoor

FEE QUESTIONS

Cultivation Tier: Tier 04: 20,001 to 30,000 sq. ft Cultivation Environment: Indoor

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Community Outreach Meeting Documentation	A.13_Attachment A.pdf	pdf	5bba94e94253fa027574ebc4	10/07/2018
Community Outreach Meeting Documentation	A.13_Attachment B.pdf	pdf	5bba94ecc4bce20c0e8e14aa	10/07/2018
Community Outreach Meeting Documentation	A.13_Attachment C_1.pdf	pdf	5bba94ee629ac50c147354aa	10/07/2018
Community Outreach Meeting Documentation	A.13_COMMUNITY OUTREACH PRESENTATION.pdf	pdf	5bba94f28266760285ba666f	10/07/2018
Community Outreach Meeting Documentation	A.13_Community-Outreach-Meeting-Attestation-Form-1.pdf	pdf	5bba94f5f2f9f2028f5215c2	10/07/2018
Certification of Host Community Agreement	A.13_TM_Host-Community-Agreement-Certification-Form.pdf	pdf	5bba95151499570299868fa3	10/07/2018
Plan to Remain Compliant with Local Zoning	A.13.5_Plan to Remain Compliant with Local Zoning.pdf	pdf	5bba968a48682102a3cf5e58	10/07/2018

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	NLG - TetraMed - Plan for Positive Impact - 7.5.19 RFI .pdf	pdf	5d3efeb36e3bd533dbcf18b	07/29/2019
Plan for Positive Impact	Tetramed Letter (1).pdf	pdf	5d6999d3d8b08e1dbf1438bb	08/30/2019

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Executive / Officer

Other Role:

First Name: Michael

Middle Name: [REDACTED] Last Name: Brickey Suffix:

RMD Association: Not associated with an RMD

Background Question: yes

Individual Background Information 2

Role: Other (specify)

Other Role: Head of Cultivation

First Name: James

Middle Name: [REDACTED] Last Name: Delbonis Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: Executive / Officer

Other Role:

First Name: Eric

Middle Name: Last Name: Canestrari Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 4

Role: Executive / Officer

Other Role:

First Name: Matthew

Middle Name: [REDACTED] Last Name: Elam Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 5

Role: Director

Other Role:

First Name: Ryan

Middle Name: [REDACTED] Last Name: Winmill Suffix:

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Parent Company

Other Role:

Entity Legal Name: TetraMed LLC

Entity DBA:

Federal Tax Identification Number EIN/TIN:

[REDACTED]

Entity Description: Parent Company & Capital Contributor

Phone: 401-919-7202

Email: mb.glassco@gmail.com

Primary Business Address 1: 114 Knotty Pines Lane

Primary Business Address 2:

Primary Business City: Plymouth

Primary Business State:

Principal Business Zip Code:

MA

02360

Additional Information:

Entity Background Check Information 2

Role: Other (specify)

Other Role: Consultant

Entity Legal Name: The Winmill Group

Entity DBA:

Federal Tax Identification Number EIN/TIN:

80-0299909

Entity Description: Security Consultant

Phone: 202-441-9348

Email: ryanwinmill@thewinmillgroup.com

Primary Business Address 1: 10307 Saddlevue Court

Primary Business Address 2:

Primary Business City: Vienna

Primary Business State: VA

Principal Business Zip Code:
22182

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Secretary of Commonwealth - Certificate of Good Standing	B.1_SOS LETTER OF GOOD STANDING.pdf	pdf	5bbad2c0f747bc02b7d2257e	10/07/2018
Department of Revenue - Certificate of Good standing	B.1_MA DOR LETTER OF GOOD STANDING.pdf	pdf	5bbad2d34253fa027574ebf3	10/07/2018
Articles of Organization	B.1_ARTICLES OF ORGANIZATION.pdf	pdf	5bbad2e01cc320027b4b22e7	10/07/2018
Bylaws	B.1_Tetramed Corporate Bylaws.pdf	pdf	5bbad2ea8266760285ba669d	10/07/2018

No documents uploaded

Massachusetts Business Identification Number: 001315054

Doing-Business-As Name:

DBA Registration City: Duxbury

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	B.2_TETRAMED FULL BUSINESS PLAN 100718.pdf	pdf	5bbad32f1499570299868fc5	10/07/2018
Proposed Timeline	B.2_Proposed Timeline.pdf	pdf	5bbad599f747bc02b7d22582	10/07/2018
Plan for Liability Insurance	B.2_Plan to Obtain Liability Insurance.pdf	pdf	5bbad5a74253fa027574ebf7	10/07/2018

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Inventory procedures	B.3_Inventory Procedures .pdf	pdf	5bbad6b0f70a1a0c28f75aee	10/08/2018
Maintaining of financial records	B.3_Maintaining of Financial Records.pdf	pdf	5bbad6b2f2f9f2028f5215f4	10/08/2018
Personnel policies including background checks	B.3_Personnel Policies.pdf	pdf	5bbad6b4a18c210c3243112a	10/08/2018
Policies and Procedures for cultivating.	B.3_Policies and Procedures for Cultivating.pdf	pdf	5bbad6b6658c0f0c3ca79c19	10/08/2018
Transportation of marijuana	B.3_TRANSPORTATION OF MARIJUANA_R.pdf	pdf	5bbad81c1cc320027b4b22ed	10/08/2018
Storage of marijuana	B.3_Storage of Marijuana.pdf	pdf	5bbad8338266760285ba66a5	10/08/2018
Restricting Access to age 21 and older	B.3_Restricted Access 21 and over .pdf	pdf	5bbad84d1499570299868fc9	10/08/2018

Record Keeping procedures	B.3_Recordkeeping Procedures_100518.pdf	pdf	5bbad85b48682102a3cf5e82	10/08/2018
Qualifications and training	B.3_Qualifications and Training.pdf	pdf	5bbad87ef747bc02b7d22586	10/08/2018
Prevention of diversion	B.3_Prevention of Diversion.pdf	pdf	5bbad88a4253fa027574ebfd	10/08/2018
Security plan	B.3_Security Plan_UPDATED 040419.pdf	pdf	5ca780b4d7a931124ee089c6	04/05/2019
Quality control and testing	NLG - TetraMed - Quality Control & Testing - 7.5.19 RFI .pdf	pdf	5d4326530dc32e386aecf19f	08/01/2019
Diversity plan	TetraMed DIVERSITY PLAN RFI 010320.pdf	pdf	5e0f5f39541f65570b948516	01/03/2020

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



Business Plan

October 7, 2018



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1.0 EXECUTIVE SUMMARY

TetraMed, LLC “(The Company)” is a proposed Cultivator Marijuana Establishment in Massachusetts, committed to creating a safe and clean community environment providing consistent, high quality cannabis to consumers who are over the age of 21.

One of the most significant challenges facing commercial cultivation facilities is the extraordinary expense due to enormous electrical consumption, and negative ramifications on the environment. TetraMed will employ Greenhouse Technology, which produces a high quality product, leaves a lower carbon footprint, and will decrease monthly electrical expenses up to 60%. This efficient and eco-friendly model allows TetraMed to keep wholesale pricing affordable for dispensaries and other establishments.

TetraMed’s management team has deep experience in designing, building and successfully running cultivation facilities in Rhode Island and also Colorado, one of the most competitive markets in the country. Chief Executive Officer Michael Brickey, Head of Cultivation James Delbonis, and their team of growers, have a successful track record of managing, expanding and consulting cannabis cultivation facilities upwards of 100,000+ square feet.

TetraMed’s efficient Greenhouse cultivation system also allows for an efficient buildout. Greenhouses have minimal building requirements compared to traditional indoor facilities, whether new or renovated. With fewer building materials, including concrete, steel, and supporting building infrastructure, the carbon footprint and other environmental impacts of a cultivation facility are even further reduced. In addition to the savings on build out costs (up to 65%), the facility will be constructed and fully operational within 6 months. Other conventional indoor facilities often require 14-24 months to become fully operational.

Product & Customers: In addition to traditional sativa, indica, and hybrid cannabis flower, TetraMed will offer a wide range of products and services that will allow the Company to serve a diverse range of customers in the cannabis market. The Company intends to offer fully cured wholesale cannabis flower product to reputable processors that are licensed in Massachusetts. With the Company’s tenure in the market, it will leverage its existing relationships with current processors in some of the largest communities in Massachusetts including Cambridge, Boston, Quincy, Brockton, Bridgewater, Lowell and Taunton.

Our Mission and Vision: TetraMed’s goals include being a social justice, employment, energy, leadership and environmental leader in Massachusetts. The Company will provide training, mentorship and employment opportunities to communities in Massachusetts. The Greenhouse facility is environmentally friendly and sets an industry standard with an emphasis on reduced electrical consumption and carbon emissions. The Company’s management team has a demonstrated track record of ethical, financial and environmental leadership. The Company’s goals are to partner with our host community - offering jobs to local residents, and giving back with substance abuse and veteran outreach programs. The Company also plans to partner with minority owned businesses in the area. Through these efforts the Company strives to positively impact our host community. The Company is committed to being a responsible local business owner, and a good neighbor.

2.0 COMPANY DESCRIPTION

Structure: TetraMed is a Massachusetts limited liability company who is applying for a Certificate of Registration from the Massachusetts Cannabis Control Commission (the “Commission”) to be licensed as a Marijuana Cultivator in Gardner, Massachusetts.

Per application guidelines and rules set out by the Commission, The Company will file an application for licensure as a Marijuana Cultivator. The application is comprised of three ‘packets’: an Application of Intent packet; a Background Check packet; and a Management and Operations Profile packet.

Capital Fundraising Phase One: TetraMed's founder Mike Brickey has committed \$300,000 to support the Company's application. To date, the Company's funds have supported the following uses:

- 85 Winter Street, Gardner - property hold fees
- Legal and professional fees
- Local and state public relations
- Early soft cost requirements for the construction of the cultivation facility
- Application development fees

Capital Fundraising Phase Two: TetraMed has multiple options for investors who are willing to fund the Phase Two build out and first year of operational costs. The Company is currently negotiating with four potential capital partners. All potential capital partners are experienced in investing in the cannabis industry with proven capital. The Company anticipates raising \$16,000,000+ to support the Company's growth, and will provide timely notice to CCC as it raises capital in accordance with 935 CMR 500.101 and 935 CMR 500.104.

The Phase Two capital funding will allow the Company to:

- purchase the property at 85 Winter Street, Gardner;
- complete all stages of construction;
- comply with all state and local permitting requirements; and
- sustain one year of operational costs.

3.0 TEAM

3.1 General

TetraMed has assembled a skilled and comprehensive team to implement the operations of the Marijuana Establishment. The Company intends to create 75+ full-time staff positions within the first three years of operations in Gardner.

3.2 Founder and CEO: Michael Brickey

TetraMed's Founder and Chief Executive Officer, Michael Brickey, has a degree in business management and has over 12 years of experience running Optional Premise Cultivation (OPC) in Colorado, which is the most robust and competitive markets in the nation. Mr. Brickey founded MJ Consulting, and was responsible for designing, scaling and building over 30 large scale commercial cultivation facilities upwards of 100,000 square feet. Mr. Brickey has consulted with some of the biggest companies in the cannabis market to date, Medicine Man, Dixie Elixirs and Pure. Mr. Brickey is also the founder of Satica, a dispensary and cultivation operation out of Aurora, Colorado. He was responsible in obtaining the state and local licensing, and held the role of Chief Cultivation Officer in the 35,000 sq ft+ cultivating facility. Mr. Brickey is known in the industry for his cultivation operations processes and systems that continue to produce maximum yields of high quality cannabis. Mr. Brickey has a thorough understanding of state compliance and regulations regarding tracking systems, reporting, and industry best practices.

Mr. Brickey shall provide overall leadership and vision for TetraMed. He will work with and support the executive management team and employees to assure that the Company is setting reasonable business and community benchmarks, achieving its goals and fulfilling its mission.

Mr. Brickey's duties shall include the following:

- Develop, oversee and execute a staffing plan and certain hiring protocols;
- Develop and implement personnel policies and procedures;
- Develop protocols to attract, hire, advance, discipline and terminate employees and volunteers as needed to support the Company's operations;
- In conjunction with the CCO, oversee compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Ensure compliance with all workplace policy laws and requirements;
- In collaboration with the Chief Compliance Officer, oversee compliance with Massachusetts law and regulations, including 935 CMR 500.000 et seq.;
- In conjunction with the CCO, oversee ongoing compliance with the provisions of 935 CMR 500.101(2)(e)(8);
- In conjunction with the CCO, oversee operating procedures to assure ongoing compliance with the provisions of 935 CMR 500.105(1);
- Working with the executive management team and the COO/GM, implement a plan to prevent the diversion of product in accordance with the applicable regulations, including 935 CMR 500.101 and 935 CMR 500.105;
- Working with the executive management team and the GM, implement a diversity plan to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations;
- Ensure that such anti-diversion plan incorporate the use of video monitoring, employee training, written guidance to employees, executive supervision and physical inspection of the premises, among other tactics;
- Ensure that each member of the executive management team shall attest by his signature that he has read and understands the requirements of 935 CMR 500.000 et seq., and shall keep a copy of such attestation within the books and records of the Company;
- Lead the Company's interactions with state regulators and municipal officials; and

- Working as the team leader with other executives and employees, to review THE COMPANY'S's business and community objectives, and implement plans to achieve those objectives.

3.3 Chief Operating Officer / General Manager: Matthew Elam

Matthew Elam is an US Army veteran and Project Management Professional (PMP) with more than 25 years of deep experience in operations and manufacturing management as well as expert-level project execution in a variety of applications and business sectors. Mr. Elam is a West Point graduate with a Bachelor's degree in Mechanical Engineering. He also holds a real estate license and has renovated 15 homes, a further testament to his entrepreneurialism and fiduciary responsibility. Additionally, Mr. Elam is a certified Lean Six Sigma Master Black Belt with thousands of hours of experience of process improvement to enhance manufacturing and business processes.

Mr. Elam served in various management roles for ten years, including Vice-President & General Manager over 3 plants and \$40 million, Plant Manager, and Manufacturing Manager where he supervised a \$14 million, three-shift operation. His foray into this field started as Construction Project Manager in the U.S. Army where he served his country for 13 years (Active Duty and Reserves) and achieved the rank of Major. This provided him with a firm foundation in project management, leadership and sourcing.

Mr. Elam is also a recipient of an Ohio Processing license. His responsibilities included application writing and development, financial modeling and executive team recruiting.

Mr. Elam is deeply knowledgeable in lean manufacturing, operations management, efficiency improvements, mentoring, budgetary constraints, analysis, and team building—all necessary skills for marijuana cultivation. His demonstrated proficiencies in these areas have resulted in outstanding performance, making him an ideal Chief Operating Officer and General Manager for TetraMed.

As COO/GM, Mr. Elam will be responsible for:

- Oversee policies and procedures relating to the cultivation facility;
- In collaboration with the CCO, oversee background check process on all employees in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.000;
- Coordinate all cultivation staff work hours, assignments and collaborations;
- Develop plan to meet the demands of the business;
- Human resources management;
- Operations and process design;
- Working with the CEO, manage financial reporting & budgeting;
- Manage payroll administration;
- Oversee accounting and payables functions
- In conjunction with CEO and contract Certified Tax Accountant, oversee tax preparation and auditing
- Oversee the training of cultivation employees in an ongoing capacity;

- Provide mandatory training for new cultivation employees;
- Maintain a record of space allocations;
- Work with cultivation staff to promote successful operations in all Company cultivation facilities;
- Maintain a database of environmental controls and conditions;
- Provide pesticide control strategies and ensure IPM program effectiveness; and
- Ensure quality control and testing of marijuana flower in compliance with 935 CMR 500.160.

3.4 Head of Cultivation: James Delbonis

Mr. Delbonis brings multiple years of medical marijuana cultivation and scientific experience to TetraMed. Mr. Delbonis owned and operated a medical marijuana cultivation consulting company from 2012-2017, consulting on architectural design, construction and cultivation strategies for facility sizes ranging from 2,000 square feet to 40,000 square feet. Mr. Delbonis' knowledge of horticulture and cannabis production on the East Coast is amongst the top performers. His experience has directly influenced the correction of under-performing medical cooperative cultivations into efficient and compliant facilities, bringing high quality, medical grade cannabis to patients in need. Mr. Delbonis brings flexibility to his consulting projects, adapting different growing styles to various indoor grows, implementing Nutrient Film Technique, Deep Water Culture, Coco coir, and soil. Mr. Delbonis has also spent years phenotype hunting and implementing technical nutrient calibration techniques which have lead to the creation of a reputable and leading genetic library with multiple award-winning strains. Mr. Delbonis has received recognition in the cannabis industry for his ability to cultivate a diverse spectrum of cannabis. He has also been published multiple times in industry publications such as 1000 Watts and Releaf – with articles specifically highlighting his work in the medical marijuana community, as well as cultivation expertise and tips for inspiring growers. Achieving second place for Concentrates in 2017 and second place for Non-solvent Extract in 2016 in the All-Star Cannabis Cups, Mr. Delbonis has proven to be among the most experienced cannabis cultivators in New England.

As the Head of Cultivation, Mr. Delbonis will be responsible for handling all cultivation processes and post-harvest product. In collaboration with the COO and CCO, Mr. Delbonis' duties shall include the following:

- Implement all policies and procedures relating to the cultivation facility;
- Coordinate repairs and maintenance;
- Perform routine maintenance and oversight of cultivation equipment, including tables, lights, HVAC, and irrigation and nutrition systems;
- Supervise and train cultivation employees in an ongoing capacity;
- Adjust all mechanical systems and cultivation operations for optimum efficiency and production;
- Develop harvest schedules;
- At the direction of the CCO, supervise Cultivation Specialists in all cultivation tasks, including the application of pesticides;

- Monitor, inventory, purchase and store all cultivation supplies and order such supplies as needed; and
- Supervise handling and transporting all harvested plants from cultivation rooms to the trim room;
- Supervise handling, transporting and disposing of all waste material from cultivation rooms;
- Supervision of trim and production capabilities;
- Delegation of tasks to Trim Specialists;
- Ensure quality control and testing of marijuana infused products in compliance with 935 CMR 500.160;
- Monitor the status of the dry room and all product in the process of drying;
- Record wet and dry weight for all product including flowers and trim;
- Oversee bulk packaging, transfer and storing in product vault;
- Preparation of product for the wholesale market;
- In collaboration with Inventory Manager and AIAs, develop procedures for inventory management, including electronic tracking and the allocation of physical space, shelves and containers within the premises including inventory protocols in compliance with 935 CMR 500.105(8) and (9); and
- In collaboration with Inventory Manager and AIAs, develop product scheduling to support sales and product development objectives.

3.5 Chief Compliance Officer: Eric Canestrari

TetraMed’s Chief Compliance Officer, Eric Canestrari is a seasoned executive with over 14 years experience and industry knowledge in fleet operations, business management, sales, and safety and compliance. His expertise in safety and compliance has given him the ability to interpret state and federal rules and regulations for various industries including but not limited to Transportation, healthcare, Hazardous materials, Human Resources, and OSHA.

Achieving a Bachelor's degree in Business Management, Mr. Canestrari initially worked for a leading transportation company responsible for overseeing daily operations. He was recognized within the company for strong performance, communication, problem solving, and leadership skills. Over the course of 10 years, he took advantage of various training courses and seminars to focus and develop his expertise on the safety and compliance aspects of business.

Working for leading national safety and compliance company, Eric travels throughout the country speaking in front of large groups of clients regarding current and upcoming legislation on all levels and the various products and services they will need to be in compliance with state and federal regulations.

Mr. Canestrari creates standard operating procedures, document retention processes, best practices, and security protocols – including implementation – for an established Fortune 500 client base. He also conducts and assists with audits when necessary. Mr. Canestrari has an exemplary track record of ensuring these top companies remain in compliance with regulatory bodies, and addresses any areas of potential concern.

As COO, Mr. Canestrari's duties shall include the following:

- In collaboration with the CEO, uphold company and facility compliance with Massachusetts law and regulations, including 935 CMR 500.000 et seq.;
- In collaboration with the CEO, facilitate the Company's interactions with state regulators and municipal officials;
- Ensure compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Prepare and amend from time to time a Company plan to assure ongoing compliance with the provisions of 935 CMR 500.101(2)(e)(8);
- Prepare and amend from time to time a set of detailed written operating procedures to assure ongoing compliance with the provisions of 935 CMR 500.105(1);
- Keep and maintain all Company records, and making such records available for inspection by the Commission, upon its request, in accordance with 935 CMR 500.105(9);
- In collaboration with the CSO, implementing and administering background checks and suitability determinations on all Company employees in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.000;
- Reviewing background checks prior to any employee commencing work, and prior to any employee being granted access to any Company facility in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.100;
- Registering each employee with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04 for purposes of determining suitability.

3.6 Security Director: Ryan Winmill

To oversee the Company's Security Program, TetraMed has appointed a Security Director Ryan Winmill, who will be exclusively dedicated to ensuring that the facility is fully compliant with all local, State and Federal security requirements. The security program will also include in-depth training for all facility employees, regularly scheduled auditing, routine reporting to the Cannabis Control Commission (CCC), and meticulous record keeping for all security activities within the Facility.

In addition to the Security Director, the Company is under contract with The Winmill Group LLC ("TWG"), a nationally-recognized security service provider. TWG has five years of experience supporting over 30 medical marijuana dispensaries and cultivation facilities nationwide including several that are currently operating in high-risk, major metropolitan urban areas. In addition to supporting these operations, TWG has over 40 years of collective law enforcement experience and includes personnel dedicated to the Massachusetts Facility whom previously held senior level positions within the U.S. Department of Homeland Security, U.S. Drug Enforcement Agency (DEA), Federal Bureau of Investigations (FBI), and the United States Department of Defense (DoD), in which they were responsible for, among other things, developing and managing premier money laundering and financial/narco-terrorism programs.

Under the supervision of the Chief Executive Officer, the Security Director is responsible for the development and overall management of the Security Policies and Procedures for the Company, implementing, administering, and revising the policies as needed.

In addition, the Security Director will perform the following duties:

- Ensure compliance with all provisions of 935 CMR 500.110;
- Review and ensure proper maintenance of all security apparatus, including physical, human and technological security methods and equipment;
- Interact with state inspectors and municipal law enforcement authorities;
- Train and supervise security staff;
- Develop a plan for educating employees on the strict anti-diversion policy at the Company;
- Develop, review and supervise the process through which the Company will report security incidents;
- Prepare reports, in written and electronic form, relative to the maintenance of security at the Company, and generate any reports required by regulation to be provided to state regulators or law enforcement;
- Maintain current list of all authorized and registered employees working for the Company;
- Maintain current list of all employees authorized to access designated areas of the facility;
- Lead a working group comprised of the CEO, CCO, CPO and any other designated personnel to ensure that current policies and procedures are properly implemented, integrated, effective, and relevant to ensure the safety of TETRAMED employees and assets;
- Work with the CS to ensure that all personnel complete and satisfy all background checks requirements prior to performing any the Company functionality; and
- Provide staffing, shift change and general oversight of security operations.
- Maintain frequent contact with the Gardner Police and Fire Department.

3.7 Additional Staff

Quality Control Manager

The Quality Control Manager is responsible for handling all post-harvest product. In collaboration with the CCO, the QC Manager duties shall include the following:

- Handling and transporting all harvested plants from cultivation rooms to the trim room;
- Handling, transporting and disposing of all waste material from cultivation rooms;
- Supervision of trim and production capabilities;
- Delegation of tasks to Trim Specialists;
- Ensuring quality control and testing of marijuana infused products in compliance with 935 CMR 500.160;
- Monitoring the status of the dry room and all product in the process of drying;
- Recording wet and dry weight for all product including flowers and trim;
- Overseeing bulk packaging, transfer and storing in product vault;

- Preparation of product for the wholesale market;
- In collaboration with Inventory Manager and AIAs, develop procedures for inventory management, including electronic tracking and the allocation of physical space, shelves and containers within the premises including inventory protocols in compliance with 935 CMR 500.105(8) and (9); and
- In collaboration with Inventory Manager and AIAs, develop product scheduling to support sales and product development objectives.

Associate Cultivation Agent: ACAs participate in daily cultivation tasks. ACAs operate under the supervision of the CCO. ACA duties shall include the following:

- Perform routine maintenance and oversight of cultivation equipment, including tables, lights, HVAC, and irrigation and nutrition systems;
- Develop harvest schedules;
- At the direction of the CCO, ACAs supervise Cultivation Specialists in all cultivation tasks, including the application of pesticides;
- Monitor, inventory, purchase and store all cultivation supplies and order such supplies as needed; and
- Report at the close of business every day to the CCO.

Cultivation Specialist: Cultivation Specialists are responsible for all tasks assigned by the CCO. A Cultivation Specialist shall report directly to CCO, or by designation of the CCO, to ACAs. Responsibilities include, but are not limited to:

- Nutrition, water and irrigation;
- Cleaning and sterilizing;
- Pruning and potting;
- Application of pesticide and pest control;
- Plant and media monitoring for mold and pest;
- Propagation; and
- Table and equipment assembly.

4.0 Operations

The Property: TetraMed will be located in Gardner, MA. The Company has a purchase and sale agreement for land, and will build a cultivation facility.

The site is located at 85 Winter Street in Gardner, in the central region of Massachusetts. This site is an industrial zoned, 10-acre parcel within a community that is amenable to TetraMed's use. The location has the proper utilities on site for a 55,000 square foot Greenhouse. The Company's general contractor and the City of Gardner have begun or completed all the following processes: Phase 1 and Phase 2 Environmental Reports; Remediation Reports and Final Clean Certificates; As-Built Plans, Utility Plans including any monitoring wells; Traffic Studies; Wetland Maps, Flagging and Restrictions; Survey & Topographic Plans; Geotech

Design; Borings and soil analysis reports, and a structural analysis of the soil. The Company is working with the Gardner Fire Inspector and Building Inspector to create plans for the property in order to maximize operating square footage, and to insure the property and facility remain in compliance with local and state codes. TetraMed and TetraMed agents shall comply with all local rules, regulations, ordinances, and bylaws.

Plan for Cessation of Operations: TetraMed has secured a surety bond in an amount equal to its licensure fee payable to the Marijuana Regulation Fund to ensure payment of the cost incurred for the destruction of cannabis goods necessitated by a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000 or the cessation of operation of the Company.

Marijuana Cultivation Environment: Greenhouse Design. The Cultivation Facility will utilize a greenhouse design, which is better for the environment than indoor cultivation for two key reasons: (1) greenhouse cultivation uses less electricity, and therefore has a reduced carbon-footprint when compared to cultivation in indoor facilities, and (2) greenhouses have a smaller environmental footprint, and rely primarily on the natural environment, rather than indoor cultivation facilities, which include robust structures and rely on the difficult process of creating an artificial “outdoor” environment inside.

Nearly all of the energy consumed in cultivation is electricity used for lighting and ventilating, and the energy bill can amount to 1/3 of production costs at an indoor cultivation. Because greenhouses harness the power of the sun to provide a warm climate, they are energy efficient, thus reducing the environmental footprint of the Facility. Greenhouses have the ability to balance light exposure and temperature through simple air vents. They use supplemental lighting to keep the climate stable, which allows for year-round cultivation just like indoor growing. The electric lights, however, are only used when natural light needs to be supplemented because of insufficient sunlight. Otherwise, the sun essentially provides the heat and light needed to grow the plants, significantly reducing the electrical costs associated with indoor cultivation. Less energy means the Facility produces a smaller environmental impact—notably a carbon-footprint— from electricity generation. This also results in substantial energy savings while the quality of the product stays consistent.

The indoor climate, greenhouse fertigation, cultivation lighting and CO₂ augmentation for the Facility will be monitored and controlled through the use of an environmental control system. Controlled environments for phases of growth are monitored in each cultivation space or zone through a series of thermostats, hygrometers, and CO₂ sensors. This greenhouse environment control system optimizes energy use. Lighting intensity and schedule are controlled through the environmental control system and the lighting controllers to maintain optimal lighting levels and photoperiod. The Company expects 40-60% in savings from electricity from this lowered demand from lights.

Moreover, greenhouses have minimal building requirements compares to an indoor facility, whether new or renovated. With fewer building materials, including concrete, steel, and supporting building infrastructure, the carbon footprint and other environmental impacts of a cultivation Facility are even further reduced.

4.1 Insurance

General Liability Insurance: TetraMed plans to contract with Brown & Brown Insurance to secure general liability insurance. The terms of this coverage are for no less than \$1,000,000 per occurrence (\$2,000,000 in aggregate annually), and product liability coverage for no less than \$1,000,000 per occurrence (\$2,000,000 in aggregate annually). The policy deductible will be no higher than \$5,000 per occurrence.

Additional Insurance Coverage: TetraMed will also consider additional coverage on an as-needed basis, such as Property, Crime, Directors & Officers insurance. The company will obtain workers compensation insurance. TetraMed will commit at least \$250,000 in escrow for liabilities coverage if they are unable to secure additional underwriting. If funding is withdrawn from this account, it will be replenished within ten (10) business days, in addition to recordkeeping in compliance with all aspects of 935 CMR 500.105(10).

Control and Responsibility: In addition to the CCC, the Gardner Police Department and other municipal departments will have oversight over TetraMed security systems and processes. The Company is comprised of experienced cultivators and professionals who will be thoroughly background checked and scrutinized by the CCC.

4.2 Inventory

Inventory: All operating procedures for inventory management will strictly adhere to requirements stated in 935 CMR 500.105(8) and 935 CMR 500.105(9). TetraMed will utilize the Merts Seed-to-Sale marijuana tracking software to create an individual barcode and serial number reference tag for every new clone or seed. This tag shall be used to reference, track, and log data about each plant beginning with propagation of a seed or clone, throughout the vegetative, flowering and testing stages in real time in accordance with 935 CMR 500.105(8)(b).

Inventory Oversight: TetraMed will perform a monthly manual inventory of all marijuana in the process of being cultivated as well as finished stored products. The Company's CEO and staff will be required to perform a comprehensive annual inventory. Findings will be recorded both manually and electronically through the seed-to-sale software as required by 935 CMR 500.105(8)(c).

Inventory Management: All operating procedures for inventory management will strictly adhere to requirements stated in 935 CMR 500.105(8) and 935 CMR 500.105(9). TetraMed will utilize the seed-to-sale marijuana tracking software to create an individual barcode and serial number reference tag for every new clone or seed. This tag shall be used to reference, track, and log data about each plant beginning with propagation of a seed or clone, throughout the vegetative, flowering and testing stages in real time in accordance with 935 CMR 500.105(8)(b).

Inventory Monitoring: TetraMed will perform a monthly manual inventory of all marijuana in the process of being cultivated as well as finished stored products. The Company's CEO and staff will be required to perform a comprehensive annual inventory. Findings will be recorded both manually and electronically through the seed-to-sale software as required by 935 CMR 500.105 (8)(c).

4.3 Record Maintenance and Product Tracking

Record Maintenance: TetraMed will maintain records, including all records required in any section of 935 CMR 500.000, which will be available for inspection by the Commission, upon request. The records shall be maintained in accordance with generally accepted accounting principles. Records shall be maintained for at least 12 months.

Cannabis Tracking System: Cultivation and processing of marijuana will be monitored by a Seed-to-Sale marijuana tracking software and over seen by TetraMed staff and senior management. Finished products will be weighed, packaged, inventoried and labeled in accordance with 935 CMR 500.105(8) and 935 CMR 500.105(9) to ensure accurate record keeping. Marijuana will be stored in compliance with 935 CMR 500.105(11).

Waste: Waste disposal shall comply with 935 CMR 500.105 (12). All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

4.4 Facility Sanitation

Sanitary Monitoring: TetraMed will comply with sanitary requirements, in accordance with 935 CMR 500.105(3)(c). All products will be handled, prepared, and stored in compliance with the sanitation requirements in 105 CMR 590.000 entitled: Minimum Sanitation Standards for Food Establishments. The Company will meet all sanitary guidelines required by 935 CMR500.160. Cultivation areas will be cleaned and monitored daily. TetraMed staff will be responsible for maintaining the cleanliness and tidiness of the cultivation location including, Greenhouse floors, entry ways, restrooms/locker rooms, Processing area and product storage areas. TetraMed employees will rely on their individual expertise, peer support and a daily checklist provided by management team to ensure a pristine and organized environment. All facility areas will be free from infestation by insects, rodents, birds, and pests of any kind.

4.5 Storage

Cannabis Testing Storage: TetraMed will ensure that all storage of marijuana at a laboratory providing marijuana testing services shall comply with 935 CMR 500.105(11). All marijuana not

passing laboratory testing standards will be disposed of in compliance with 935 CMR 500.105(12).

Finished Cannabis Storage: Per the requirements of 935 CMR 500.110, TETRAMED will store all finished marijuana products in a secure, locked safe or vault to prevent loss, theft, and diversion. All vaults, safes, and any other equipment or areas used for the storage of marijuana products will be securely locked and protected from entry, except for the actual time required to remove or replace marijuana.

Finished Cannabis Storage Protection: As per the requirements of 935 CMR 500.105(3)(b)(15) TETRAMED will store finished products under conditions that will protect them against chemical, microbial, and physical contamination, as well as against deterioration of finished products or their containers.

Damaged Cannabis Product Storage: The facility will have separate areas for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed, in accordance with applicable provision of 935 CMR 500.105(12).

4.6 Environmental Considerations

Environmental Building & Growing Practices: The Cultivation Facility will utilize a greenhouse design, which is better for the environment than indoor cultivation for two key reasons: (1) greenhouse cultivation uses less electricity, and therefore has a reduced carbon-foot print when compared to cultivation in indoor facilities, and (2) greenhouses have a smaller environmental footprint, and rely primarily on the natural environment, rather than indoor cultivation facilities, which include robust structures and rely on the difficult process of creating an artificial “outdoor” environment inside.

Minimizing Resource Needs: The Company will employ several methods of sustainability, to further minimize the Facility’s resource needs, including CO2 and water reclamation.

In addition to Greenhouse energy-efficient processes, TetraMed will demonstrate consideration of the factors for Energy Efficiency and Conservation outlined in 935 CMR 500.105(15) as part of its operating plan and application for licensure.

Greenhouse building design: Greenhouses have minimal building requirements compares to an indoor facility, whether new or renovated. With fewer building materials, including concrete, steel, and supporting building infrastructure, the carbon footprint and other environmental impacts of a cultivation Facility are even further reduced.

Energy Efficiency: Nearly all of the energy consumed in cultivation is electricity used for lighting and ventilating, and the energy bill can amount to 1/3 of production costs at an indoor cultivation. As greenhouses harness the power of the sun to provide a warm climate, they are energy efficient, thus reducing the environmental footprint of the Facility. Greenhouses have the

ability to balance light exposure and temperature through simple air vents. Supplemental lighting is used to keep the climate stable, which allows for year-round cultivation just like indoor growing. The electric lights, however, are only used in cases where natural light is insufficient. Otherwise, the sun essentially provides the heat and light needed to grow the plants, significantly reducing the electrical costs associated with traditional indoor cultivation facilities. Less energy consumption means the facility produces a smaller environmental impact – notably a carbon-footprint – from electricity usage. Substantial energy savings and consistent high quality product are the results.

Environmental Control System: The indoor climate, greenhouse fertigation, cultivation lighting and CO2 augmentation for the Facility will be monitored and controlled through the use of an environmental control system. Controlled environments for phases of growth are monitored in each cultivation space or zone through a series of thermostats, hygrometers, and CO2 sensors. This Greenhouse environment control system optimizes energy use. Lighting intensity and schedule are controlled through the environmental control system. The lighting controllers maintain optimal lighting levels and photoperiod. TetraMed expects 40-60% in electrical savings from this lowered energy demand.

4.7 Lighting & Light Optimization

Facility Lighting: The facility will have adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110.

Greenhouse Lighting: The greenhouse structure capitalizes on natural light which is better for plants than cultivation lighting and minimizes demand on energy for cultivation lighting by 40 – 60%. In many cases, HID (High Intensity Discharge) lighting can account for more than 50% of the facility’s electrical demand.

4.8 Security Plan

Operating Procedures for the Provision of Security: TetraMed’s team has extensive experience implementing Security Plans to ensure safety, regulatory compliance, and industry “best practices.” This experience includes utilizing Security Plans that have already been approved, and independently certified by dozens of local and state law enforcement authorities in several different states where the Company affiliates currently holds multiple licenses. Our experience not only includes the written responses set forth below, but also real-world operational security experience implementing these procedures for large-scale medical cannabis cultivation grows. Further, the Company’s Security Plan presented herein not only meets the regulatory requirements set for by 935 CMR 500, but in most cases surpasses the requirements and includes proprietary procedures that the TetraMed team has developed over the years.

Surveillance Technology and Physical Security: Pursuant to 935 CMR 500.110, the TetraMed’s security system will be designed to provide a level of coverage that meets - and in most cases

exceeds - the requirements set forth in the State's regulatory requirements. Further, our proposed security system design will integrate with TetraMed's Security Operations Plan and provide an industry best standard security environment for ongoing operations.

Our proposed security system architecture will incorporate the following technical specifications, subject to further coordination with CCC and Massachusetts State Police during our anticipated implementation phase. Pursuant to 500.110(1) (o) the Company will share security plan and procedures with law enforcement authorities and fire services and periodically update law enforcement authorities and fire services if the plans or procedures are modified in a material way. Specific security measures include the following:

- IP Video
- HD Monitoring Cameras
- Panic Alarms
- Motion Sensors
- Outside Perimeter Lighting

System Emergency Notification features includes the following:

- Duress alarm
- Panic alarm
- Holdup alarm
- Intrusion alarm
- Duress, Panic and Holdup and Intrusion alarms
- Auto voice dialer with
- Failure notification
- Multiple redundant signaling feeds
- IP Server capturing video feeds will be available for streaming video feed access 24 hours per day, 7 days per week to the CCC (if required).

Security Guards: Pursuant to 500.110 (1) (b) full time security guards will provide onsite support, and the system will also have (two) remote monitoring station. Only authorized employees who are essential to security operations will have access to security systems. We will maintain a list of those authorized persons for release to CCC and Massachusetts State Police upon request. Additionally, we will make available to CCC, Massachusetts State Police, and other appropriate law enforcement officials, access to electronic security systems via a secure web-based portal.

Below is an overview of the Facility's alarm and surveillance systems. The security system will be equipped with a CCTV video surveillance system in operation 24 hours per day and 7 days per week.

Alarm System: We will install and maintain a professional robbery/burglary alarm system with triple redundancy that will cover entry and exit points, rooms with exterior windows, rooms with exterior walls, roof hatches, skylights, and storage rooms containing safes. The alarm system

and security features will have a battery backup; all electronically locked doors will not fail in an ‘unlocked’ status during a power interruption and will remain secure (except to allow emergency egress from inside areas)

Video Surveillance System Capabilities:

- Operating during power outages; (per 500.110(5) (a))
- Exporting still images in .jpg, .bmp, or .gif formats;
- Producing video disks compatible with Windows;
- Supporting pan, tilt, and zoom functionality;
- Archiving in proprietary format to ensure authentication; and saving exported video in industry standard files.
- Transmitted data over the RTP as well as the RTSP.

Two Auxiliary Power Sources: The security alarm system at our Facility will be capable of operating for 48 hours through auxiliary power sources. The first mode of auxiliary power operation will be through a UPS battery backup system, which provides up to 45 minutes of operation for the security alarm system in the event of a power failure. The Facility will be equipped with a backup electric generator and capable of providing power to maintain the security alarm system in operation for an additional 48 hours.

Cloud Based Servers and Remote Monitoring: Our Facility will be equipped with a video surveillance system in operation 24 hours per day and 7 days per week utilizing a recognized security alarm monitoring service provider with cloud-based servers for continuous video recording and multiple remote monitoring stations for a minimum period of 90 days and up to 5 years.

Security Audit and Testing: In addition to ongoing security system monitoring and maintenance, we will conduct a weekly, monthly, quarterly and an annual system test.

Medical Marijuana Storage (Vault Security): Pursuant to 500.110(g) TetraMed will utilize a state-of-the-art storage system that is designed to ensure safe and compliant operations at all times. This will include utilization of custom-made vault rooms, which will in turn contain internal safes that are each equipped with independent locking and monitoring systems. During hours of operation, all marijuana will be stored in established restricted access areas accessible only to authorized agents. Only the minimum number of employees essential for efficient operations will be permitted within the restricted access areas at any given time. Further, these areas will be monitored at all times by onsite security guards and a remote monitoring station.

Restricted Access: Pursuant to 500.110(1) (1) (c) All restricted access areas will be secured with locking devices that prevent access from storage areas and will be under video surveillance 24 hours a day and seven (7) days a week. All restricted access areas will be identified by the posting of multiple signs that will be a minimum of 12” x 12” and that states: “Do Not Enter – Limited Access Area – Access Restricted to Authorized Personnel Only.” All lettering on the sign will be no smaller than one inch in height.

24-Hour Security Features: When the Facility is closed, the Company will store all medical marijuana at the Facility in a secure, climate-controlled vault that will be monitored by an internal and external service, 24 hours a day, for both security and changes in environment (temperature and humidity). TetraMed will further enhance their storage area by including the following features:

- BioMetric Locks
- Panic Alarm
- Motion Sensors
- U/V and Night Vision Cameras
- Back Up Power Supply
- Alarm Monitoring
- Fire Detection Monitoring
- Proximity Card Readers
- Sirens

Secure Storage, Vault Rooms, and Internal Safes for Separate Inventory and Cash Payments: THE COMPANY will implement industry best practices to prevent unauthorized access and/or the from their storage and vault rooms. This includes four layers of alarmed redundancy and a biometric access control panel to ensure secure operations, as well as multiple physical barriers including reinforced walls, steel doors, and surveillance cameras.

Inventory policies and procedures for each vault room will also prevent diversion and employee abuse of inventory. Inventory control systems and access control software will record access for the entire Facility and generate a record for orders, receiving, and management of supplies and inventory within each vault room.

Security Policies and Procedures: Our staff will be trained on the procedures presented in this CONOPS and will be thoroughly familiar with a range of security topics including anti diversion; physical safety; suspicious activity reporting; evacuation; fire; theft; and emergency communications, among other topics. The CONOPS will be presented to employees and used as the basis for detailed instructions in building security measures, personnel security measures, emergency response procedures, daily normal checklists, and emergency contact procedures.

4.9 Emergency Procedures

Medical Emergencies: Staff will be instructed and trained on 911 procedures for medical emergencies including injury, assault, accidents, and sudden or unexpected illness, among others. All staff will be offered training in and be required to become CPR certified as an employee.

Fire: Our staff will undergo initial and recurring training covering fire safety procedures. Our staff will be trained that in the event of any fire, their immediate priorities is for their personal safety and the safety of patients and other employees.

Chemical Spill: In the unlikely event of a chemical spill, staff will be trained to call 911 and request assistance from local police and fire. Staff will be trained to report the specific nature of the incident including the size, type of agent, location of the spill, and any immediate medical emergencies.

Armed Robbery: If the Facility is threatened with or experiences an armed robbery, staff training will include the following instruction and guidance: the immediate action by all staff is to comply with any instructions or demands from the armed robber. Staff are trained and instructed not to confront or attempt to disable the intruder. If possible, staff shall use any means to alert law enforcement, including two primary means: calling 911 and/or activating the duress alarm placed at staff locations within the Facility.

Burglary: Our staff will be trained that if they detect that a burglary or other criminal trespass has occurred that they should follow set procedures outlined in the training and contained in their operational checklists. Staff will be trained to immediately report the suspicion of a burglary or criminal trespass to the Facility security officer and operational manager.

Emergency Notification Procedures: TetraMed's emergency notifications procedures will ensure clear, concise, and transparent reporting in the event of an emergency with state and local partners at all times. The Company will do this by maintaining a close working relationship with law enforcement and the CCC prior to opening the Facility, and in accordance with Massachusetts regulations we will promptly inform our local law enforcement agency if we observe or otherwise have reliable information that any drug-related crime, suspicious activity, or incident has occurred at our Facility. As previously explained in the Security Plan Procedures, all ownership and personnel will receive security training that specifically addresses emergency communication policies and procedures including the following:

Security Policies and Procedures: TetraMed's staff will be trained on the procedures presented in CONOPS and will be thoroughly familiar with a range of security topics including anti diversion; physical safety; suspicious activity reporting; evacuation; fire; theft; and emergency communications, among other topics. The CONOPS will be presented to employees and used as the basis for detailed instructions in building security measures, personnel security measures, emergency response procedures, daily normal checklists, and emergency contact procedures.

Employee Reporting Obligations and Procedures (During and After Security Incidents): TetraMed's training will include reporting requirements for how to document and notify authorities if/when an incident occurs.

Operational Security (OPSEC) and Threat Awareness: TetraMed will protect critical sensitive operational information, safeguard inventory, promote safety of employees both on and off the premises, and reduce risk to employees, patients, and members of the public.

Security Procedures and Responsibilities for External Partnerships: This module focuses on training with external agencies such as local law enforcement, the fire department, CCC, and state police among others.

Internal Key Staff Notification: In the event of an incident or an emergency a contact list (with phone numbers, email, and cell phone) will be activated, and include notifications for the following individuals: Chief Executive Officer; COO; CCO; Security Director; Cultivation Director; Facility Manager; and General Counsel.

External Agencies / Departments: TetraMed believes that emergency notification response work best when all parties understand what to do during an actual emergency. Proactively, the Company will not only meet with CCC, law enforcement, and fire official prior to opening, but further proposes to conduct emergency notification exercises that test both party's ability to respond to an actual event. In the event of an incident or an emergency a contact list (with phone numbers, email, and cell) will be activated and depending on the nature of the incident include the following agency notifications: CCC; Massachusetts State Police; Massachusetts Department of Public Health; local law enforcement; local fire department; local jurisdiction government offices; local utility company; local jurisdiction hospital; DEA; and the FBI.

4.10 Disposal of Marijuana

Disposal of Marijuana: Disposal of marijuana will be in accordance with 935 CMR 500.105(12) in excess of the quantity required for normal, efficient operation as established within 935 CMR 500.105 as follows:

Waste Disposal. All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, shall be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

4.11 Benefits to the Municipality

TetraMed looks forward to working cooperatively with City of Gardner. The municipality approved the *2016 Ballot Question 4* legalizing adult use of marijuana. TetraMed has been developing the community relationship with Gardner for several months. Multiple meetings with town officials, community members and civic leaders have resulted in open discussions and establishing positive communication channels. The Company has shared its commitment to operate as a responsible, contributing member of the Gardner community. In addition, the Company and the City of Gardner have agreed upon a plan for a mutually beneficial relationship, outlined in its executed Host Community Agreement. The City of Gardner is enthusiastic for TetraMed to join the community as a responsible and transparent business partner and neighbor. The City stands to benefit in various ways that are outlined in the Agreement, including:

Job Growth in the Community: As a Marijuana Cultivator facility, TetraMed will add 75 full-time jobs, in addition to hiring qualified, local contractors and vendors.

Monetary Benefits to the Community: A Host Community Agreement with significant monetary donations would provide the City with additional financial benefits beyond local property taxes.

Access to Quality Cannabis Product: TetraMed intends to provide the community with adult use cannabis of the highest quality and standards. TetraMed will do so by implementing strict operational controls, maintaining a sanitary and secure environment, and utilizing independent laboratory testing in compliance with 935 CMR 500.105(1)(g).

Economic Development: TetraMed’s construction of the cultivation facility will revitalize the Gardner area and contribute to the overall economic development of the local community.

Community Outreach: TetraMed has achieved all Host Community Agreement and Host Community Outreach meeting requirements.

5.0 Zoning

In accordance with Gardner’s Zoning Bylaws, the proposed property is located in Gardner’s I1 District.

In accordance with the CCC’s regulations set forth in 935 CMR 500.110(3), the property is not located within 500 feet of a public or private school providing education to children in kindergarten or grades 1 through 12.

TetraMed (the “Company”) will remain compliant at all times with the local zoning requirements set forth in the Gardner’s Zoning Code Revision for CC_02 22 18. In accordance with Zoning Code Revision for CC_02 22 18, Sections 675-1070(A-E) (Marijuana Establishments) and 675-410 (Schedule of Use Regulations). The Company’s proposed Cultivation Facility is located in the Industrial (I1) Zoning District designated for Marijuana Cultivator.

In compliance with Gardner’s Zoning Code Revision CC_02 22 18, Section 675-1070(A-C):

- 1) The Company shall be contained within a building or structure.
- 2) The hours of operation shall be set by the special permit granting authority.
- 3) The Company’s property line shall not be located within 500 linear feet of a lot line where the following districts, activity, or uses occur:
 - (a) A nonconforming residential dwelling that has not been abandoned or unoccupied for a period of two years;
 - (b) Any church, public or private school or child-care facility; or place where minors frequent (e.g., a library, ball field, park, sports or family recreation facility, religious facility or the like);
 - (c) Any other marijuana establishment;
 - (d) Any drug or alcohol rehabilitation facility; or
 - (e) Any correctional facility, half-way house or similar facility.
- (5) No smoking, burning or consumption of any product containing marijuana or marijuana-

related products shall be permitted on the premises of a marijuana establishment.

(6) No marijuana establishment shall be located inside a building containing residential units, including transient housing such as motels and dormitories, or inside a movable or mobile structure such as a van or truck.

(7) Marijuana establishments shall provide the Gardner Police and Fire Departments, Building Commissioner, Board of Health, and the special permit granting authority with the names, phone numbers and e-mail addresses of all management staff and key holders to whom one can provide notice if there are operating problems associated with the establishment.

(8) The City of Gardner shall have access at any time to inspect the premises of the marijuana establishment to ensure compliance with local and state regulations, excluding client health information protected under the Health Insurance Portability and Accountability Act of 1996.

(9) Pursuant to Massachusetts General Laws Chapter 94G, Section 3(b) (2) the maximum number of Licensed Marijuana Establishments in the City of Gardner shall be consistent with the following provision.

- a) Shall not prohibit one or more types of Marijuana Establishment.
- b) The number of marijuana retail establishments, shall not exceed 20% of liquor licenses issued for retail sale of alcohol not consumed on the premises in the City of Gardner. Said number to be rounded up to the next whole number.
- c) The number of Marijuana Establishments shall not exceed the number of registered medical marijuana treatment centers in Gardner engaged in the same type of activity and shall not prevent the conversion of a medical marijuana treatment center licensed or registered no later than July 1, 2017 to a marijuana establishment engaged in the same type of activity.
- d) Notwithstanding the provisions of (9) a -c above the number of standalone licensed non-retail marijuana establishments shall not exceed one

In compliance with 935 CMR 500.110(3), the property is not located within 500 feet of an existing public or private school providing education to children in kindergarten or grades 1 through 12.

As required by Gardner's Zoning Code Revision for CC_02 22 18, 675-1070 Section D(1-6), the Company will apply for a Special Permit and Site Plan Approval from the Gardner Planning Board in accordance with MGL c. 40A § 9, first having been obtained from the Gardner Planning Board, § 675-1020, Site Plan Review, of this chapter. In addition to the standards set forth within, the site plan must meet all dimensional, parking, landscaping and signage requirements within this chapter.

In compliance with Gardner's Zoning Code Revision for CC_02 22 18 Section D(1-6) with notation of sections:

(3) A special permit for a marijuana establishment shall be limited to one or more of the following uses that shall be prescribed by the special permit granting authority:

- (a) The Company will comply as a Marijuana Cultivator,
- (4) In addition to the application requirements set forth above, a special permit application for a marijuana establishment shall include the following:
 - (a) The name and address of each owner of the establishment;
 - (b) Copies of all required licenses and permits issued to the Company by the Commonwealth of Massachusetts Cannabis Control Commission and any of its other agencies for the establishment;
 - (c) Evidence of the Company's right to use the site of the establishment for the establishment, such as a purchase and sale agreement, deed, owner's authorization, or lease;
 - (d) Proposed security measures for the marijuana establishment, including lighting, fencing, gates and alarms, etc., to ensure the safety of persons and to protect the premises from theft. A letter from the City of Gardner Police Chief, or designee, acknowledging review and approval of the marijuana establishment security plan is required. To the extent allowed by law, all such documents shall be confidential.

- (5) Mandatory findings. The special permit granting authority shall not issue a special permit for the Company unless it finds that:
 - (a) the Company is designed to minimize any adverse impacts on abutters and other parties in interest, as defined in MGL c. 40A, § 11.
 - (b) the Company demonstrates that it will meet all the permitting requirements of all applicable agencies within the Commonwealth of Massachusetts and will comply with all applicable state laws and regulations; and
 - (c) the Company has satisfied all the conditions and requirements set forth herein.

(6) A special permit granted under this section shall have a term limited to the duration of the Company's ownership or leasehold of the premises as a marijuana establishment. A special permit may be transferred only with the approval of the special permit granting authority in the form of an amendment to the special permit with all information required in this § 675-1070.

Abandonment or discontinuance of use:

- (1) A special permit shall lapse if not exercised within one year of issuance.
- (2) The Company shall be required to remove all material, plants equipment and other paraphernalia:
 - (a) Prior to surrendering its state issued licenses or permits; or
 - (b) Within six months of ceasing operations; whichever comes first.

The Company will apply for any and all other required local permits to operate a Marijuana Cultivator facility at the proposed location including but not limited to a building permit, electrical permit, mechanical permit, plumbing permit, gas permit, fire suppression/sprinkler permit, Department of Public Works permit, signage permit, and a Board of Health Permit.

The Company will comply with all conditions and standards set forth in any local permit required to operate as a Marijuana Cultivator at the Company's proposed location.

The Company has already attended several meetings with various municipal officials and boards

and a community outreach meeting to discuss the Company's plans for a proposed Marijuana Cultivator facility and has executed a Host Community Agreement with Gardner MA. The Company will continue to work cooperatively with various municipal departments, boards, and officials to ensure that the Company's Marijuana Cultivator facility remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

The Company has also retained the law firm The Nuciforo Law Group to assist with ongoing compliance with local zoning requirements.

6.0 Regulatory Compliance

Regulations: The Company is a Marijuana Establishment, consistent with the objectives of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000.

Business Registration: The Company will be registered to do business in the Commonwealth as a domestic business corporation or another domestic business entity in compliance with 935 CMR 500.000 and maintain the corporation in good standing with the Massachusetts Secretary of the Commonwealth and the Department of Revenue.

Permits: The Company applied for all state and local permits and approvals required to build the facility.

Compliance: The Company will also work cooperatively with various municipal departments to ensure that the proposed facility complies with all state and local codes, rules and regulations with respect to design, renovation, operation and security.

7.0 MARKET RESEARCH

7.1 Location

TetraMed's (the "Company's") proposed location is located in Gardner. Surrounding areas include Winchendon, Rindge, Fitchburg, Leominster, Athol, Lunenburg, New Ipswich, Townsend, Holden Clinton, Groton and Pepperrell, Olde English Village, South Gardner, East Gardner, East Templeton, Templeton, Partridgeville, Otter River, South Ashburnham, Baldwinville, Westminster, Whitmanville, Brooks Village, and Pitcherville.

7.2 Competition

Competitors: TetraMed has no direct competitors in Gardner, as the commission has not yet granted a provisional or final certificate to any Adult-Use applicant in the city. TetraMed presumes that regional RMDs certified by the Massachusetts Department of Public Health may pursue Adult-Use certification and may therefore provide competition. The commission has granted a final certification for Adult Use retail in Leicester, approximately 25 miles south of TetraMed's location in Gardner.

Other RMD and Cultivation Facilities Near Gardner: According to Mass.gov, the Registered Medical Marijuana Dispensaries (RMD) and Cultivation Facilities located near Gardner (and Central/Western), MA are as follows:

- Patriot Care, Cultivation only in Greenfield, MA, Cultivation and Retail in Lowell, MA)
- Garden Remedies (Cultivation Only), Fitchburg, MA
- Central Ave Compassionate Care, Ayer, MA
- New England Treatment Access (Retail only), Northampton, MA

Online research indicates the following RMDs are operating near Gardner (and Central/Western) MA:

- Temescal Wellness, Hudson, MA
- RISE, Amherst, MA
- NETA, Northampton, MA
- INSA, Easthampton, MA and Springfield, MA
- Curaleaf, Oxford, MA
- Berkshire Roots, Pittsfield, MA
- Cultivate, Leicester, MA
- CannaKings, Worcester, MA

Competitive Advantage: The Company's competitive advantages over their competition include an experienced senior management team who have decades of successful experience in the Cannabis industry, especially as it pertains to Massachusetts. The team's expertise encompasses the whole spectrum, from state Cannabis licensing, Cannabis lobbying, local permitting, design and build of cultivation facilities and large-scale commercial cultivation.

Management Experience: The Company's Founder and Chief Executive Officer, Michael Brickey, has a degree in business management and has over 12 years of experience running Optional Premise Cultivation (OPC) in Colorado, which is the most robust and competitive markets in the nation to date. Mr. Brickey founded MJ Consulting, and was responsible for designing, scaling and building over 30 large scale commercial cultivation facilities upwards of 100,000 sq ft. Mr. Brickey has consulted with some of the biggest companies in Cannabis to date, Medicine Man, Dixie Elixirs and Pure to name a few. Mr. Brickey is also the founder of Sativa, a dispensary and cultivation operation out of Aurora, Colorado. He was responsible in obtaining the state and local licensing, took the role of Chief Cultivation Officer, cultivating upwards of 35,000 sq ft and creating systems that time and time again, produce maximum yields

of high quality cannabis. Mr. Brickey has a working knowledge of state tracking systems, reporting requirements and industry best practices.

The Company's Chief Compliance Officer, Eric Canestrari is a seasoned executive with over 14 years experience and industry knowledge in fleet operations, business management, sales, and safety and compliance. His expertise in safety and compliance has given him the ability to interpret state and federal rules and regulations for various industries including but not limited to Transportation, healthcare, Hazardous materials, Human Resources, and OSHA.

The Company's Head of Cultivation, Mr. Delbonis brings multiple years of medical marijuana cultivation and scientific experience to TetraMed in Rhode Island. Additionally, Mr. Delbonis owned and operated a medical marijuana cultivation consulting company from 2012-2017, consulting on architectural design, construction and cultivation strategies for facility sizes ranging from 2,000 square feet up to 40,000 square feet. Mr. Delbonis' knowledge of horticulture and cannabis production on the East Coast is amongst the top performers. His experience has directly influenced the correction of under-performing medical cooperative cultivations into efficient and compliant facilities, bringing high quality, medical grade cannabis to patients in need.

Industry Support: Preeminent cannabis leaders in the nation also support the Company in security, systems design, engineering, construction and infrastructure. In addition, Massachusetts' cannabis industry specialists will support the Company and focus on legal, regulations, and compliance operations.

Superior Facility Design: The Company's Greenhouse facility design is its competitive advantage. With its eco-friendly design, technology and processes, it will consume up to 60% less energy than traditional indoor cultivation facilities. The production of less waste and a reduced carbon footprint ultimately lead to a cleaner environment, and a lower cost of product to the Commonwealth of Massachusetts.

In every business, there is competition. The Company's strengths will allow the Company to stand apart. The Company will strive to be a leader in the state – employing state-of-the art and compliant cultivation best practices.

8. PRODUCTS

TetraMed (the "Company") will produce high quality cannabis, which will come in a variety of strains and product types. The products will be sold recreationally in a wholesale pricing structure to Massachusetts-licensed recreational dispensaries.

The Company will also provide wholesale trim material to Massachusetts-licensed recreational processors. The Company's product lines will consist of multiple strains of cannabis including sativa, indica and hybrid variations. Our strains will be selected and grown to have different levels of THC, CBD and other components of the cannabis plant, as a diverse product line will

better serve the client base. The Company's products will include raw material as well as processed materials.

The Company's facility will perform a perpetual-cycle style of growing, working on every aspect of a plant's life-cycle from seedling to sale. Cultivation including planting of clones taken from female plants, promoting the plants into a flowering or budding state, trimming all leaf material, and drying and storing flowers to cure.

8.1 Pricing

Pricing Structure: The current retail price of cannabis is \$6000 per pound. The Company will be able to produce 450 pounds of cannabis per month, at \$2400 a pound wholesale, conservatively. There is a possibility that the price of wholesale cannabis could reach as high as \$3000 a month in the first fiscal year. Waste (or 'trimming') product is sold at \$500 a pound.

8.2 Intellectual Property Rights

The Company intends to develop intellectual property, including cultivation methods, MIP production methods, brand, design, logo, look, feel and other product characteristics. The Company will possess and protect this intellectual property in accordance with Massachusetts law and industry standards.

8.3 Research & Development

The Company realizes that the future of the cannabis industry will rely on Research & Development. Under the direction of Head of Cultivation, James Delbonis, TetraMed will continue to develop innovative methods for growing styles to its greenhouse grow. In addition, the Company will further research with phenotype hunting and technical nutrient calibration techniques. Research and development in this area will continue to build the award-winning genetic library of which Mr. Delbonis is primarily responsible. The genetic library is an outcome of knowledge-based phenotype processes and selection. The Company is also committed to supporting clinical research as it realizes that providing evidence-based, scientifically validated and repeatable relationships between the plant's active ingredients and medical efficacy is essential to obtaining regulatory and widespread medical acceptance. Therefore, the Company is planning to network with and form strategic relationships with companies and services providing MA-based clinical programs.

9. MARKETING & SALES

9.1 Communications

TetraMed will engage in reasonable marketing, advertising, and branding practices that are not otherwise prohibited in 935 CMR 500.105(4)(b) that do not jeopardize the public health, welfare or safety of the general public or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising and branding created for viewing by the public shall include the statement “Please Consume Responsibly,” in a conspicuous manner on the face of the advertisement and shall include a minimum of two of the warnings, located at 935 CMR 500.105(4)(a), in their entirety in a conspicuous manner on the face of the advertisement.

The Company’s marketing, advertising and branding shall include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½)(xxvi): “This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA.”

TetraMed will provide a printed list of the prices and strains of marijuana available to wholesale customers, and will post the same information and list on its website.

9.2 Packaging

Single and Multiple Servings: Packaging for marijuana products sold or displayed for consumers in multiple servings shall allow a consumer to easily perform the division into single servings, and shall be clearly marked, in a clear, legible font: “Includes Multiple Servings”. Any single serving on an edible cannabis product contained in a multiple-serving package shall be marked, stamped, or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product. At no point will an individual serving size of any marijuana product contain more than five (5) milligrams of delta-nine tetrahydrocannabinol.

9.3 Sales Strategies

TetraMed realizes that the adult-use market in Massachusetts will be evolving over the next several years. With that in mind, the sales and marketing strategy will evolve.

Initially, the Company’s sales strategy will be under the direction of the Sales Manager, working with the Chief Executive Officer, and include the following:

- 1) Leverage existing adult-use licensed dispensary and processing establishment

relationships in Massachusetts.

- a. TetraMed has tenure in Massachusetts and will reach out directly to owners and operators to solidify agreements
- 2) Know the market: Research and identify all other adult-use licensed dispensary and processing establishments in Massachusetts.
 - a. of those targets, identify those that may be interested in purchasing wholesale products
 - b. develop outreach strategies specifically for local dispensaries and processors around Gardner, network for referrals
 - c. identify who is purchasing products from competitors
 - d. employ marketing strategy that includes cold calls, networking through referral, email marketing and advertising
- 3) Continue to monitor the adult-use market and refine strategies as needed
- 4) As the customer base grows, the sales team will be dedicated to monitoring and auditing the relationship and is responsible to provide feedback to the Chief Executive Officer and Chief Operating Officer. The best method to grow sales is to keep existing customers satisfied. As their businesses grow, demand for product will grow.

The Company has developed a logo to be used in labeling, signage, and other materials such as letterhead and sales materials. The logo is discreet, unassuming, and does not use medical symbols, images or references of marijuana, or related paraphernalia.

9.4 Growth Strategy

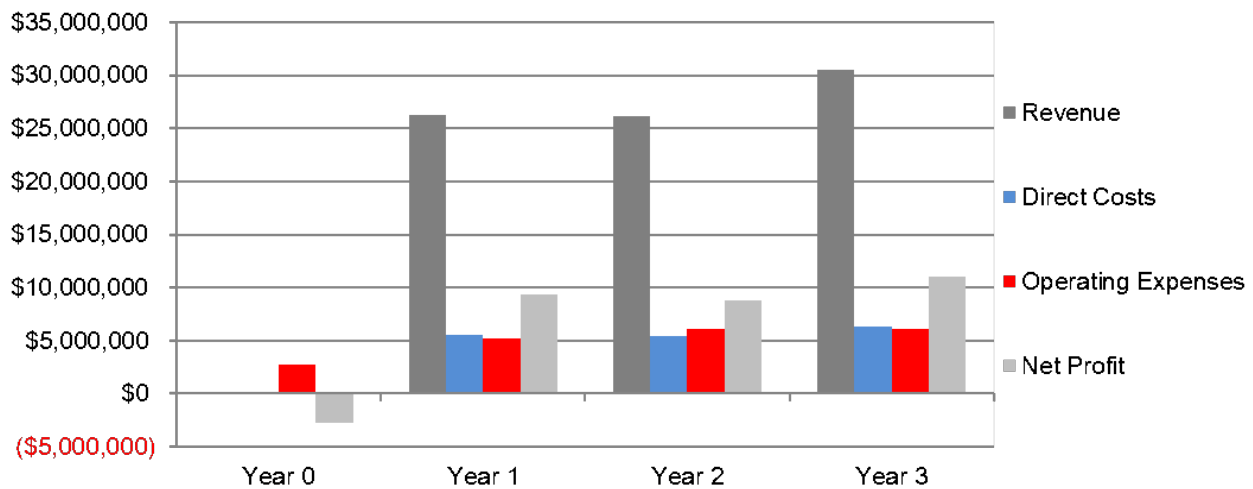
Expansion Plans: Over time, TetraMed plans to grow the company. For example, after it completes its state and municipal permitting and commences sales operations, the Company anticipates expanding its cultivation capacity, including an expansion of 7,500 square feet of canopy space and additional extraction space designed to utilize waste material. The Company will timely notify the commission of any such expansion, and will identify the sources of capital and the personnel supporting such expansion in accordance with 935 CMR 500.000. The Company will also comply with municipal zoning ordinance and the state building code. By the 4th year of operation, the Company will fully utilize its footprint and maximize its capacity.

10. FINANCIAL PROJECTIONS

The following is TetraMed's (the "Company's") four-year revenue forecast. Direct costs include all costs which can be directly tied to revenue and include "cost of goods."

Please see next page

Financial Highlights



FINANCIAL HIGHLIGHTS				
	Year 0	Year 1	Year 2	Year 3
Total Revenue	\$0	\$26,280,933	\$26,182,614	\$30,540,028
Gross Margin	\$0	\$20,757,373	\$20,756,456	\$24,251,089
Operating Expenses	\$2,716,185	\$5,224,700	\$6,066,660	\$6,066,660
EBITDA*	(\$1,913,722)	\$16,726,830	\$15,883,952	\$19,378,585
Net Profit	(\$2,716,185)	\$9,319,604	\$8,813,878	\$10,996,032
<i>*Earnings before interest, taxes, depreciation & amortization</i>				
Profitability Ratios				
Gross Margin/Revenue	N/A	79%	79%	79%
EBITDA/Revenue	N/A	64%	61%	63%
Net Profit %	N/A	35%	34%	36%
Debt Ratios				
Debt Ratio (Total Debt/Total Assets)	119.05%	84.60%	66.43%	66.43%
Interest Coverage Ratio	N/A	N/A	N/A	N/A
Debt Service Coverage Ratio	N/A	N/A	N/A	N/A
Days on Hand				
Receivables	0	0	0	0
Inventory	0	0	0	0
Payables	0	0	0	0
Net Cash Flow	\$1,819,427	\$6,325,622	\$6,490,600	\$7,663,713
Cash Balance - Ending	\$1,819,427	\$8,145,050	\$14,635,649	\$22,299,362

The Company's personnel forecast is outlined below:

PERSONNEL FORECAST				
	Year 0	Year 1	Year 2	Year 3
Staff Count Per Position				
CEO	1	1	1	1
CFO	1	1	1	1
COO	1	1	1	1
Dir. Compliance	1	1	1	1
General Manager	1	1	1	1
Admin. Staff	8	8	8	8
Sales	1	2	2	1
Growers	10	10	14	10
Trimmers	4	4	6	4
Security	1	1	3	1
Total Personnel	29	30	38	29
Salary Per Position				
CEO	\$114,000	\$190,000	\$195,700	\$201,571
CFO	\$110,000	\$110,000	\$113,300	\$116,699
COO	\$153,330	\$160,000	\$164,800	\$169,744
Dir. Compliance	\$120,000	\$120,000	\$123,600	\$127,308
General Manager	\$100,000	\$100,000	\$103,000	\$106,090
Admin. Staff	\$43,749	\$43,749	\$45,061	\$46,413
Sales	\$90,000	\$90,000	\$92,700	\$95,481
Growers	\$81,617	\$81,617	\$84,066	\$86,587
Trimmers	\$55,080	\$55,080	\$56,732	\$58,434
Security	\$77,760	\$77,760	\$80,093	\$82,496
Payroll Per Position (Count x Salary)				
CEO	\$114,000	\$190,000	\$195,700	\$201,571
CFO	\$110,000	\$110,000	\$113,300	\$116,699
COO	\$146,664	\$160,000	\$164,800	\$169,744
Dir. Compliance	\$60,000	\$120,000	\$123,600	\$127,308
General Manager	\$33,333	\$100,000	\$103,000	\$106,090
Admin. Staff	\$214,662	\$349,992	\$360,492	\$371,307
Sales	\$15,000	\$127,500	\$185,400	\$286,443
Growers	\$272,057	\$816,170	\$1,176,917	\$1,212,225
Trimmers	\$18,360	\$220,320	\$340,394	\$350,606
Security	\$45,360	\$77,760	\$240,278	\$247,487
Total Payroll	\$1,029,435	\$2,271,742	\$3,003,882	\$3,189,479
Payroll/Revenue	N/A	8.64%	11.47%	10.44%

6.1 Financial Assumptions

The table below shows the units and pricing assumptions underlying the Company’s revenue forecast:

UNIT ASSUMPTIONS				
	Year 0	Year 1	Year 2	Year 3
Units				
Flower (pounds)	0	10,800	11,102	13,569
Trim (pounds)	0	722	1,296	1,376
Total Units	0	11,522	12,398	14,945
Unit Price				
Flower (\$)	\$2,400.00	\$2,400.00	\$2,300.00	\$2,200.00
Trim (\$)	\$500.00	\$500.00	\$500.00	\$500.00
Direct Unit Cost				
Flower Cost Per Pound				
Nutrients	\$22.65	\$22.65	\$22.65	\$22.65
Lab Testing	\$12.50	\$12.50	\$11.25	\$10.12
Water/Sewer	\$8.25	\$8.25	\$8.25	\$8.25
Trash	\$2.00	\$2.00	\$2.00	\$2.00
Electric/Gas	\$86.78	\$86.78	\$86.78	\$86.78
Labor	\$401.91	\$401.91	\$401.91	\$401.91
Total Flower Cost Per Pound	\$534.08	\$507.37	\$482.00	\$457.90
Trim (\$)	\$64.09	\$60.88	\$57.84	\$54.95

6.2 Profit & Loss

The following table and graph illustrate TetraMed’s (the “Company”) Profit and Loss from start-up through Year 3. The Company intends to deploy its funding to maximize growth and profitability. In the Profit and Loss table below, gross margin equals revenue minus direct costs. The “bottom line” or profit (as measured before and after interest, taxes, depreciation, and amortization) equals gross margin minus operating expenses.

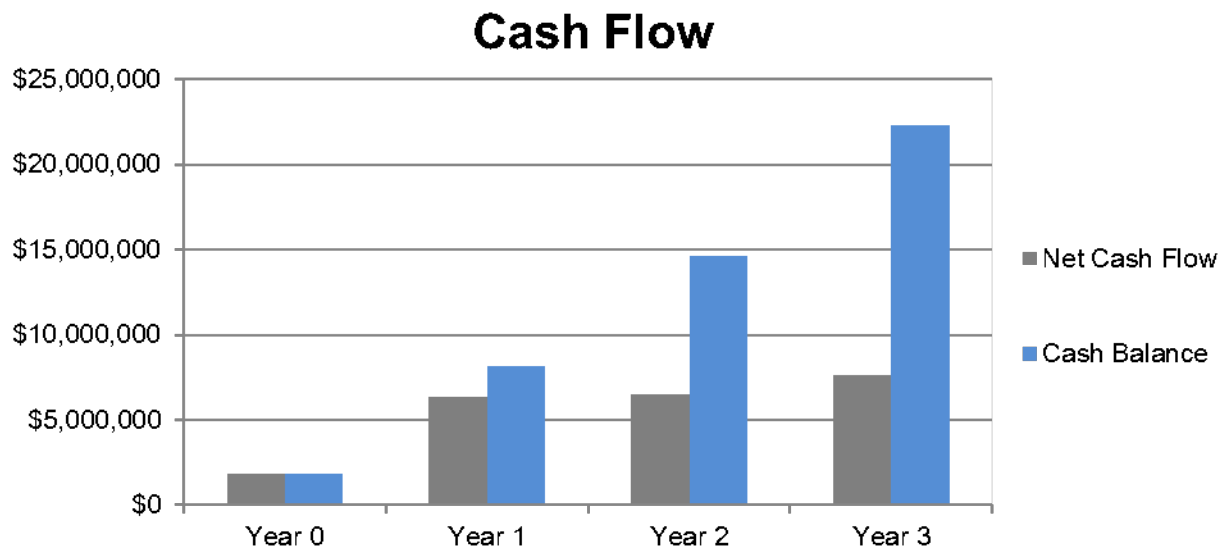
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PRO FORMA PROFIT & LOSS

	Year 0	Year 1	Year 2	Year 3
Total Revenue	\$0	\$26,280,933	\$26,182,614	\$30,540,028
Total Direct Cost of Revenue	\$0	\$5,523,560	\$5,426,158	\$6,288,939
Gross Margin	\$0	\$20,757,373	\$20,756,456	\$24,251,089
Gross Margin/Revenue	0%	79%	79%	79%
Expenses				
Security Consultants	\$85,000	\$0	\$0	\$0
Business Offices	\$12,000	\$12,000	\$12,000	\$12,000
Compliance EQ	\$10,611	\$0	\$0	\$0
Property Insurance	\$40,500	\$54,000	\$54,000	\$54,000
Depreciation	\$802,463	\$1,194,156	\$1,194,156	\$1,194,156
Payroll Taxes & Benefits	\$154,415	\$340,761	\$450,582	\$450,582
Total Personnel	\$1,029,435	\$2,271,742	\$3,003,882	\$3,003,882
Total Op. Expenses	\$2,716,185	\$5,224,700	\$6,066,660	\$6,066,660
Profit Before Int. & Tax	(\$2,716,185)	\$15,532,674	\$14,689,796	\$18,184,429
EBITDA	(\$1,913,722)	\$16,726,830	\$15,883,952	\$19,378,585
Interest Expense	\$0	\$0	\$0	\$0
Taxes Incurred	\$0	\$6,213,070	\$5,875,918	\$7,188,397
Net Profit	(\$2,716,185)	\$9,319,604	\$8,813,878	\$10,996,032
Net Profit %	0.0%	35.5%	33.7%	36.0%

6.3 Cash Flow

The following depictions of the TetraMed's projected cash flow from start-up through Year 3:



CASH FLOW				
	Year 0	Year 1	Year 2	Year 3
OPERATING				
Net Profit	(\$2,716,185)	\$9,319,604	\$8,813,878	\$10,782,595
Adjustments to Net Profit				
Depreciation & Amortization	\$802,463	\$1,194,156	\$1,194,156	\$1,194,156
(Increases)/Decreases in Accounts Receivable	\$0	\$0	\$0	\$0
(Additions)/Depletions of Inventory	\$0	(\$460,297)	\$8,117	\$0
Increases/(Decreases) in Accounts Payable	\$0	\$0	\$0	\$0
Net Cash From Operating Activities	(\$1,913,722)	\$10,053,464	\$10,016,151	\$11,976,751
INVESTING				
Purchase of Other Current Assets	\$11,249,997	\$0	\$0	\$0
Sale of Other Current Assets	\$0	\$0	\$0	\$0
Purchase of Land	\$775,000	\$0	\$0	\$0
Sale of Land	\$0	\$0	\$0	\$0
Purchase Long-term Assets	\$691,565	\$0	\$0	\$0
Sale of Long-term Assets	\$0	\$0	\$0	\$0
Net Cash From Investing Activities	\$12,716,562	\$0	\$0	\$0
FINANCING				
Investment	\$100,000	\$0	\$0	\$0
Dividends	\$0	(\$3,727,842)	(\$3,525,551)	(\$4,313,038)
New Current Borrowing	\$16,349,711	\$0	\$0	\$0
Current Borrowing Repay.	\$0	\$0	\$0	\$0
New Long Term Liabilities	\$0	\$0	\$0	\$0
Long Term Liability Repay	\$0	\$0	\$0	\$0
Net Cash From Financing Activities	\$16,449,711	(\$3,727,842)	(\$3,525,551)	(\$4,313,038)
NET CASH FLOW	\$1,819,427	\$6,325,622	\$6,490,600	\$7,663,713
Beginning Cash	\$0	\$1,819,427	\$8,145,050	\$14,635,649
Ending Cash	\$1,819,427	\$8,145,050	\$14,635,649	\$22,299,362

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6.4 Balance Sheet

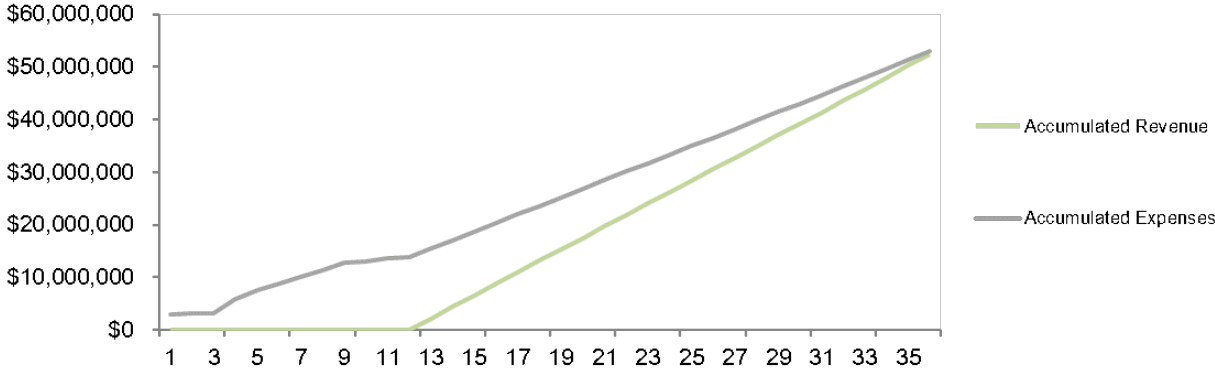
The balance sheet below highlights the Company's projected assets, liabilities, and capital:

BALANCE SHEET				
	Year 0	Year 1	Year 2	Year 3
Assets				
Current Assets				
Cash	\$1,819,427	\$8,145,050	\$14,635,649	\$22,299,362
Accounts Receivable	\$0	\$0	\$0	\$0
Inventory	\$0	\$460,297	\$452,180	\$452,180
Other Current Assets	\$0	\$0	\$0	\$0
Total Current Assets	\$1,819,427	\$8,605,346	\$15,087,829	\$15,087,829
Fixed Assets				
Long-term Assets	\$11,941,562	\$11,941,562	\$11,941,562	\$11,941,562
Accum. Depreciation	\$802,463	\$1,996,620	\$3,190,776	\$3,190,776
Land	\$775,000	\$775,000	\$775,000	\$775,000
Total Fixed Assets	\$11,914,099	\$10,719,942	\$9,525,786	\$9,525,786
Total Assets	\$13,733,526	\$19,325,289	\$24,613,615	\$24,613,615
Liabilities and Capital				
Current Liabilities				
Accounts Payable	\$0	\$0	\$0	\$0
Current Borrowing	\$16,349,711	\$16,349,711	\$16,349,711	\$16,349,711
Other Current Liabilities	\$0	\$0	\$0	\$0
Subtotal Current Liabilities	\$16,349,711	\$16,349,711	\$16,349,711	\$16,349,711
Long-term Liabilities				
Long-term Liabilities	\$0	\$0	\$0	\$0
Total Liabilities	\$16,349,711	\$16,349,711	\$16,349,711	\$16,349,711
Capital				
Paid-in Capital	\$100,000	\$100,000	\$100,000	\$100,000
Retained Earnings	\$0	\$5,591,763	\$5,288,327	\$6,469,557
Earnings	(\$2,716,185)	\$9,319,604	\$8,813,878	\$10,782,595
Total Capital	(\$2,616,185)	\$2,975,578	\$8,263,904	\$14,733,461
Total Liabilities and Capital	\$13,733,526	\$19,325,289	\$24,613,615	\$31,083,172

Please see next page.

6.5 Break Even Analysis

Break Even Month: 37



Plan to Obtain Liability Insurance

General Liability Insurance: TetraMed plans to contract with Brown & Brown Insurance to secure general liability insurance. The terms of this coverage are for no less than \$1,000,000 per occurrence (\$2,000,000 in aggregate annually), and product liability coverage for no less than \$1,000,000 per occurrence (\$2,000,000 in aggregate annually). The policy deductible will be no higher than \$5,000 per occurrence.

Additional Insurance Coverage: TetraMed will also consider additional coverage on an as-needed basis, such as Property, Crime, Directors & Officers insurance. The company will obtain workers compensation insurance. TetraMed will commit at least \$250,000 in escrow for liabilities coverage if they are unable to secure additional underwriting. If funding is withdrawn from this account, it will be replenished within ten (10) business days, in addition to recordkeeping in compliance with all aspects of 935 CMR 500.105(10).

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

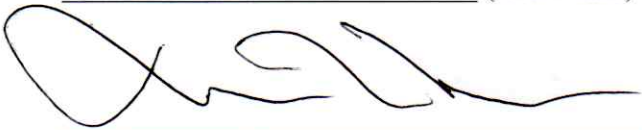
I, Michael Brickey, (*insert name*) certify as an authorized representative of TetraMed LLC (*insert name of applicant*) that the applicant has executed a host community agreement with Gardner (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on 08/21/18 (*insert date*).



Signature of Authorized Representative of Applicant

Host Community

I, MARK HAWKIE, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for Gardner (*insert name of host community*) to certify that the applicant and Gardner (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 08/21/18 (*insert date*).



Signature of Contracting Authority or
Authorized Representative of Host Community

12:50 PM 7/20/19

R. Jean

7/20/19

**NOTICE OF COMMUNITY OUTREACH MEETING
TETRAMED, LLC**

Notice is hereby given that **Tetramed, LLC** will hold a Community Outreach Meeting on **July 30, 2018** at the Gardner Police Department, Community Room, 200 Main Street, Gardner, MA 01440 between **6:30 – 7:30 PM** to discuss the proposed siting of an Adult Use Marijuana Cultivation Facility at 85 Winter Street, Gardner in accordance with M.G.L. ch. 94G and the Massachusetts Cannabis Control Commission's regulations at 935 CMR 500.000 *et seq.*

Topics to be discussed at the meeting will include, but not be limited to:

1. The type(s) of Adult-Use Marijuana Establishment(s) to be located at the proposed address;
2. Plans for maintaining a secure facility;
3. Plans to prevent diversion to minors;
4. Plans to positively impact the community; and
5. Plans to ensure the establishment will not constitute a nuisance to the community.

Interested members of the community are encouraged to ask questions and receive answers from company representatives about the proposed facility and operations.

A copy of this notice has been published in a local newspaper at least seven (7) calendar days prior to the meeting and filed with the appropriate City entities. This notice was also mailed at least seven (7) calendar days prior to the meeting to abutters within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list.

**NOTICE OF COMMUNITY OUTREACH MEETING
TETRAMED, LLC**

RECEIVED
2018 JUL 20 PM 12:52
CITY CLERK'S OFFICE
GARDNER, MA

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RECEIVED
2018 JUL 20 PM 12:53
MAYOR'S OFFICE
TETRAMED, LLC
CITY CLERK'S OFFICE
GARDNER, MA

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MC
7/20/18
Planning

**NOTICE OF COMMUNITY OUTREACH MEETING
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5. Plans to ensure the establishment will not constitute a nuisance to the community.

Interested members of the community are encouraged to ask questions and receive answers from company representatives about the proposed facility and operations.

A copy of this notice has been published in a local newspaper at least seven (7) calendar days prior to the meeting and filed with the appropriate City entities. This notice was also mailed at least seven (7) calendar days prior to the meeting to abutters within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list.

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, Michael Brickey, (*insert name*) attest as an authorized representative of TetraMed 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 July 30, 2018 (*insert date*).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on July 23, 2018 (*insert date*), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on July 20, 2018 (*insert date*) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on July 23, 2018 (*insert date*), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

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

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

INTRODUCING THE TETRAMED ADVANTAGE

TetraMed

GROW FACILITY

JULY 30, 2018
COMMUNITY OUTREACH



TETRAMED GROW FACILITY

COMPANY OVERVIEW

TETRAMED GROW FACILITY, IS CURRENTLY EMBARKING ON AN APPLICATION PROCESS IN THE COMMONWEALTH OF MASSACHUSETTS TO OBTAIN A LICENSE TO OPERATE A CULTIVATION FACILITY FOR THE RECREATIONAL MARKET.

WE EXPECT TO START THE 6 MONTH BUILD OUT OF OUR 55,000 SQ FT GREENHOUSE CULTIVATION FACILITY BY OCTOBER OF 2018, AND WILL BE COMPLETED AND FULLY OPERATIONAL BY MARCH OF 2019.

OUR TEAM

COMPANY OVERVIEW

At TetraMed our team is comprised of individuals who, as a whole, have decades of successful experience in the Cannabis industry, especially as it pertains to Massachusetts. The team's expertise run the entire spectrum of the Cannabis space, from state Cannabis licensing, Cannabis lobbying, local permitting, design and build of cultivation facilities, large scale commercial cultivation, commercial extraction and the final sale of product.

TETRAMED TEAM BIOS

COMPANY OVERVIEW

Michael Brickey is our Founder and will be our Chief Operating Officer. Mike has a degree in business management and has over 12 years experience running **Optimal Premise Cultivation (OPC)** in Colorado, which is the most robust and competitive markets in the nation to date. Mike founded MJ Consulting, and was responsible for designing, scaling and building over 30 large scale commercial cultivation facilities upwards of 100,000 sq ft. He has consulted with some of the biggest companies in Cannabis to date, Medicine Man, Dixie Elixirs and Pure to name a few. Mike was also the founder of Sativa, a dispensary and cultivation operation out of Aurora, Colorado. Mike was responsible in obtaining the state and local licensing, took the role of Chief Cultivation Officer, cultivating upwards of 35,000 sq ft and creating systems that time and time again, produce maximum yields of high quality cannabis. Michael has a working knowledge of state tracking systems, reporting requirements and best practices.

COMPANY OVERVIEW (CONTINUED)

The Windmill Group, LLC security consultant and systems design team. Ryan Windmill has 15 years of consulting experience including management for the U.S. Department of Homeland Security, law enforcement, fire services and emergency management. James Davis has over 30 years of law enforcement experience; FBI agent, Special Agent in Charge of the Bureau's Denver office; Director of the Colorado Department of Public Safety, oversaw all aspects of the public safety and law enforcement aspects of medical marijuana licensees in that state.

Chief Operating Officer / General Manager: Matthew Elam

Matthew Elam is an US Army veteran and Project Management Professional (PMP) with more than 25 years of deep experience in operations and manufacturing management as well as expert-level project execution in a variety of applications and business sectors. Mr. Elam is a West Point graduate with a Bachelor's degree in Mechanical Engineering. He also holds a real estate license and has renovated 15 homes, a further testament to his entrepreneurialism and fiduciary responsibility. Additionally, Mr. Elam is a certified Lean Six Sigma Master Black Belt with thousands of hours of experience of process improvement to enhance manufacturing and business processes.

COMPANY OVERVIEW (CONTINUED)

Head of Cultivation: James Delbonis brings multiple years of medical marijuana cultivation and scientific experience to TetraMed. Additionally, Mr. Delbonis owned and operated a medical marijuana cultivation consulting company from 2012-2017, consulting on architectural design, construction and cultivation strategies for facility sizes ranging from 2,000 square feet up to 40,000 square feet. Mr. Delbonis' knowledge of horticulture and cannabis production on the East Coast is amongst the top performers. His experience has directly influenced the direction of under-performing medical cooperative cultivation facilities into efficient and compliant facilities, bringing high quality, medical grade cannabis to patients in need.

Chief Compliance Officer: Eric Canestrari

TetraMed's Chief Compliance Officer, Eric Canestrari is a seasoned executive with over 14 years experience and industry knowledge in fleet operations, business management, sales, and safety and compliance. His expertise in safety and compliance has given him the ability to interpret state and federal rules and regulations for various industries including but not limited to Transportation, healthcare, Hazardous materials, Human Resources, and OSHA.

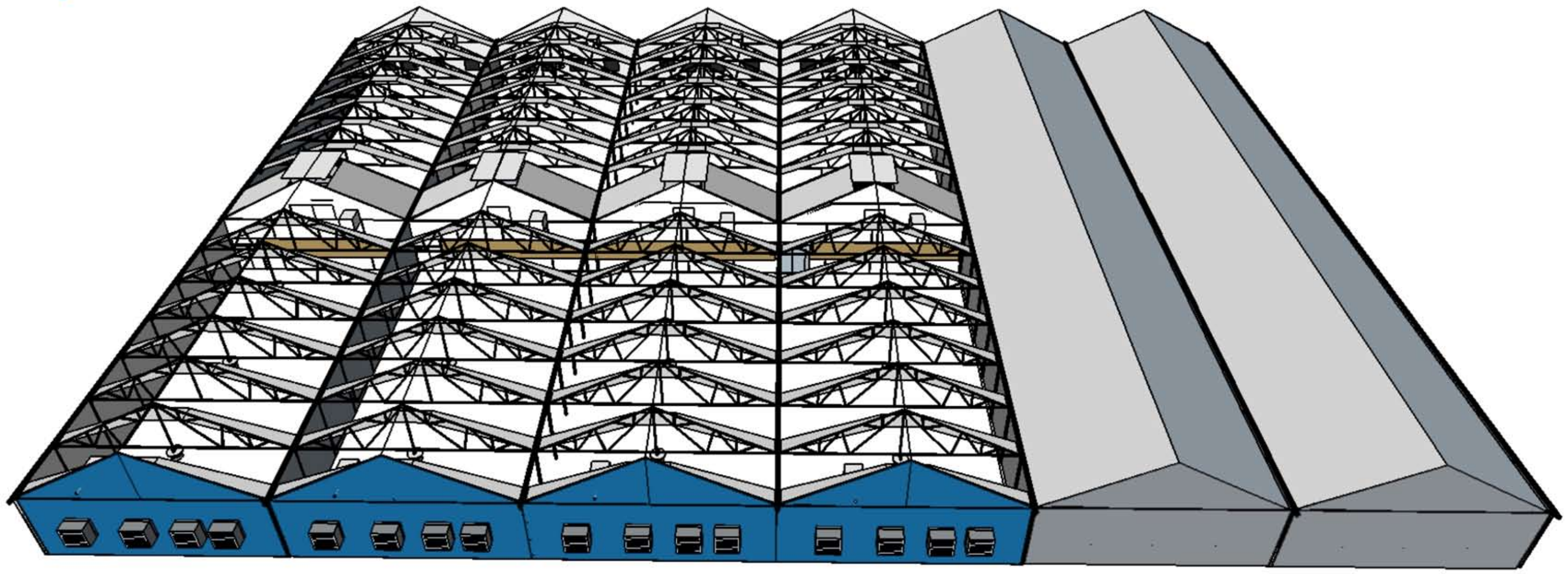


TETRAMED

COMPLIANCE WITH LOCAL ZONING

Our team intends to site a marijuana cultivation facility at 85 Winter Street in Gardner, Massachusetts. The site is located in the I-1 Zone.

TetraMed will diligently pursue all required permits that Gardner necessitates.



TETRAMED

SECURITY

- **No members of the public will be granted access to the site.**
- All employees will be badged and checked in by security at the entryway to the facility. Visitors (contractors, etc.) must be badged in and accompanied by a cultivation agent at all times. A security guard will staff the entryway 24/7.
- Perimeter security, including motion sensors, alarms, and video surveillance, will be installed to protect the site from unauthorized intrusion.
- Multiple redundant alarm systems will be operable in the case of power outage. Video surveillance will capture the exterior of the greenhouses, entry- and exit-way, and any location that contains marijuana.



TETRAMED

NUISANCE PREVENTION

Our success as a cannabis operator is a direct reflection of our commitment to and work with the surrounding community.

Security personnel and cultivation personnel will undergo rigorous training to implement a series of Standard Operating Procedures relative to best practices in day-to-day operations; prevention of diversion to unauthorized parties; and prevention of neighborhood nuisance.

Consumption of marijuana on-site or in the immediate neighborhood will not be tolerated. Those who violate this provision will be reported to local law enforcement.

Local business owners will be given the direct contact information of our facility manager, who will be on call to address and immediately remedy any issues that arise.

There will be minimal signage on site for the purpose of wayfinding only.



TETRAMED

PREVENTING DIVERSION

- No members of the public will ever be allowed on site. In the event that TetraMed discovers any of its agents intentionally or negligently sold or diverted marijuana to an individual under the age of 21, the agent will be immediately terminated and the CCC will be promptly notified.
- TetraMed will not engage in any marketing, advertising, or branding practices that are targeted to, deemed to appeal to, or portray minors under 21 years of age. Trichome will not manufacture or sell any edible products that resemble a realistic or fictional human, animal, or fruit, including artistic, caricature, or cartoon renderings.
- Any marketing, advertising, and branding materials for public viewing will include a warning stating, "For use only by adults 21 years of age or older. Keep out of the reach of children."
- TetraMed's website will require all online visitors to verify they are 21 years of age or older prior to accessing the website.
- TetraMed will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors.



TETRAMED

NUISANCE PREVENTION

Video and live surveillance will be available to ensure that the establishment does not create nuisance conditions in the parking area, sidewalk, street, and area surrounding the premises and adjacent properties.

The following behaviors will not be permitted on site –

- Any disturbance of the peace
- Public consumption of cannabis
- Illegal drug activity under state or local law
- Excessive littering
- Excessive loitering or pedestrian / vehicular traffic
- Illegal parking or violations of state and local traffic laws
- Queuing of patrons or other obstructions of the public or private way



TETRAMED

OUR COMMITMENT TO COMMUNITY

- Through the signing of a host community agreement, annual revenue for the town that will be directed towards community priorities.
- Tax revenues through a local option agreement.
- 30+ new full-time, well-paying jobs in addition to temporary construction jobs through capital improvement period.
- A robust outreach program to ensure that the community has an opportunity to express their concerns and learn more about the project.
- Contributions to local community organizations.

CONTACT
AND FIND US



P • 401 • 919 • 7202





UNITED STATES
POSTAL SERVICE

Certificate
Mail

This Certificate of Mailing provides evidence that mail has been presented to USPS for mail. This form may be used for domestic and international mail.

From:

Tetamed, LLC

30 Powder Mill Avenue

Duxbury, MA 02532

To:

Gardner Redevelopment Authority

115 Pleasant Street RM 100

Gardner, MA 01440

U.S. POSTAGE
PAID
NORTHAMPTON, MA
01060
JUL 23 18
AMOUNT

\$1.40

R2304N118202-72



0000

Plan to Remain Compliant with Local Zoning

TetraMed (“the Company”) will remain compliant at all times with the local zoning requirements set forth in the Gardner’s Zoning Code Revision for CC_02 22 18. In accordance with Zoning Code Revision for CC_02 22 18, Sections 675-1070(A-E) (Marijuana Establishments) and 675-410 (Schedule of Use Regulations). The Company’s proposed Cultivation Facility is located in the Industrial (I1) Zoning District designated for Marijuana Cultivator.

In compliance with Gardner’s Zoning Code Revision CC_02 22 18, Section 675-1070(A-C)

- 1) TM shall be contained within a building or structure.
- 2) The hours of operation shall be set by the special permit granting authority.
- 3) TM’s property line shall not be located within 500 linear feet of a lot line where the following districts, activity, or uses occur:
 - (a) A nonconforming residential dwelling that has not been abandoned or unoccupied for a period of two years;
 - (b) Any church, public or private school or child-care facility; or place where minors frequent (e.g., a library, ball field, park, sports or family recreation facility, religious facility or the like);
 - (c) Any other marijuana establishment;
 - (d) Any drug or alcohol rehabilitation facility; or
 - (e) Any correctional facility, half-way house or similar facility.
- (5) No smoking, burning or consumption of any product containing marijuana or marijuana-related products shall be permitted on the premises of a marijuana establishment.
- (6) No marijuana establishment shall be located inside a building containing residential units, including transient housing such as motels and dormitories, or inside a movable or mobile structure such as a van or truck.
- (7) Marijuana establishments shall provide the Gardner Police and Fire Departments, Building Commissioner, Board of Health, and the special permit granting authority with the names, phone numbers and e-mail addresses of all management staff and key holders to whom one can provide notice if there are operating problems associated with the establishment.
- (8) The City shall have access at any time to inspect the premises of the marijuana establishment to ensure compliance with local and state regulations, excluding client health information protected under the Health Insurance Portability and Accountability Act of 1996.
- (9) Pursuant to Massachusetts General Laws Chapter 94G, Section 3(b) (2) the maximum number of Licensed Marijuana Establishments in the City of shall be consistent with the following provision.
 - a) Shall not prohibit one or more types of Marijuana Establishment.
 - b) The number of marijuana retail establishments, shall not exceed 20% of liquor licenses issued for retail sale of alcohol not consumed on the premises in the City of Gardner. Said number to be rounded up to the next whole number.

- c) The number of Marijuana Establishments shall not exceed the number of registered medical marijuana treatment centers in Gardner engaged in the same type of activity and shall not prevent the conversion of a medical marijuana treatment center licensed or registered no later than July 1, 2017 to a marijuana establishment engaged in the same type of activity.
- d) Notwithstanding the provisions of (9) a -c above the number of standalone licensed non-retail marijuana establishments shall not exceed one.

In compliance with 935 CMR 500.110(3), the property is not located within 500 feet of an existing public or private school providing education to children in kindergarten or grades 1 through 12.

As required by Gardner's Zoning Code Revision for CC_02 22 18, 675-1070 Section D(1-6), TM will apply for a Special Permit and Site Plan Approval from the Gardner Planning Board in accordance with MGL c. 40A § 9, first having been obtained from the Gardner Planning Board, § 675-1020, Site Plan Review, of this chapter. In addition to the standards set forth within, the site plan must meet all dimensional, parking, landscaping and signage requirements within this chapter.

In compliance with Gardner's Zoning Code Revision for CC_02 22 18 Section D(1-6) with notation of sections:

- (3) A special permit for a marijuana establishment shall be limited to one or more of the following uses that shall be prescribed by the special permit granting authority:
 - (a) The Company will comply as a Marijuana Cultivator,
- (4) In addition to the application requirements set forth above, a special permit application for a marijuana establishment shall include the following:
 - (a) The name and address of each owner of the establishment;
 - (b) Copies of all required licenses and permits issued to the Company by the Commonwealth of Massachusetts Cannabis Control Commission and any of its other agencies for the establishment;
 - (c) Evidence of the Company's right to use the site of the establishment for the establishment, such as a purchase and sale agreement, deed, owner's authorization, or lease;
 - (d) Proposed security measures for the marijuana establishment, including lighting, fencing, gates and alarms, etc., to ensure the safety of persons and to protect the premises from theft. A letter from the City of Gardner Police Chief, or designee, acknowledging review and approval of the marijuana establishment security plan is required. To the extent allowed by law, all such documents shall be confidential.
- (5) Mandatory findings. The special permit granting authority shall not issue a special permit for the Company unless it finds that:
 - (a) the Company is designed to minimize any adverse impacts on abutters and other parties in interest, as defined in MGL c. 40A, § 11.

(b) the Company demonstrates that it will meet all the permitting requirements of all applicable agencies within the Commonwealth of Massachusetts and will comply with all applicable state laws and regulations; and

(c) the Company has satisfied all the conditions and requirements set forth herein.

(6) A special permit granted under this section shall have a term limited to the duration of the Company's ownership or leasehold of the premises as a marijuana establishment. A special permit may be transferred only with the approval of the special permit granting authority in the form of an amendment to the special permit with all information required in this § **675-1070**.

E. Abandonment or discontinuance of use.

(1) A special permit shall lapse if not exercised within one year of issuance.

(2) The Company shall be required to remove all material, plants equipment and other paraphernalia:

(a) Prior to surrendering its state issued licenses or permits; or

(b) Within six months of ceasing operations; whichever comes first.

The Company will apply for any and all other required local permits to operate a Marijuana Cultivator facility at the proposed location including but not limited to a building permit, electrical permit, mechanical permit, plumbing permit, gas permit, fire suppression/sprinkler permit, Department of Public Works permit, signage permit, and a Board of Health Permit.

The Company will comply with all conditions and standards set forth in any local permit required to operate as a Marijuana Cultivator at the Company's proposed location.

The Company has already attended several meetings with various municipal officials and boards to discuss the Company's plans for a proposed Marijuana Cultivator facility and has executed a Host Community Agreement with Gardner MA. The Company will continue to work cooperatively with various municipal departments, boards, and officials to ensure that the Company Marijuana Cultivator facility remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.

The Company has also retained the law firm Nuciforo Law Group to assist with ongoing compliance with local zoning requirements.



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$100.00

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

Restated Certificate of Organization

(General Laws, Chapter)

Identification Number: 001315054

The date of filing of the original certificate of organization: 2/27/2018

1. The exact name of the limited liability company is: TETRAMED LLC
 and if changed, the name under which it was originally organized:

2a. Location of its principal office:

No. and Street: 85 WINTER ST
 City or Town: GARDNER State: MA Zip: 01440 Country: USA

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

No. and Street: 30 POWDER POINT AVE
 City or Town: DUXBURY State: MA Zip: 02332 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:
MANUFACTURING

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: JOHN GREENE
 No. and Street: 30 POWDER POINT RD
 City or Town: DUXBURY State: MA Zip: 02332 Country: USA

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

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	MIKE BRICKEY	33 ROCKY HILL RD NORTH SCITUATE, RI 02857 US

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	Address (no PO Box)
-------	-----------------	---------------------

	First, Middle, Last, Suffix	Address, City or Town, State, Zip Code
SOC SIGNATORY	MIKE BRICKEY	33 ROCKY HILL RD NORTH SCITUATE, RI 02857 USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
REAL PROPERTY	MIKE BRICKEY	33 ROCKY HILL RD NORTH SCITUATE, RI 02857 USA

9. Additional matters:

10. Describe any amendments to be effected by the restated certificate, and if none, include a statement to that affect:

NONE

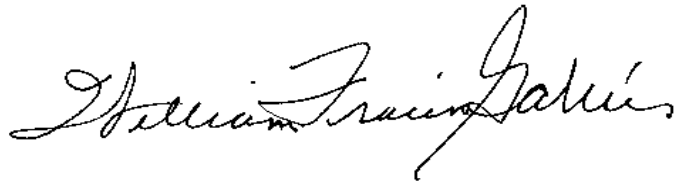
11. The restated certificate shall be effective when filed unless a later effective date is specified:

**SIGNED UNDER THE PENALTIES OF PERJURY, this 5 Day of October, 2018,
MIKE BRICKEY , Signature of Applicant.**

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:

October 05, 2018 12:14 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
TETRAMED 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 2 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 have a corporate seal, which shall be affixed to all deeds, mortgages, and other instruments affecting or relating to real estate. 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

Chris Lupini, Secretary of Tetramed LLC hereby certifies that the foregoing is a true and correct copy of the bylaws of the above-named corporation, duly adopted by the incorporator(s) on April 20, 2018.

This Corporate Bylaws is executed and agreed to by:

Chris Lupini _____

Chris Lupini

mb.glassco@gmail.com

September 29, 2018 at 07:14 pm

Recorded at IP 72.87.126.110

Scan this code with your
smartphone to manage
your Corporate Bylaws
online.





CERTIFICATE OF GOOD STANDING/TAX COMPLIANCE REQUEST STATUS



TETRAMED LLC
33 ROCKY HILL RD
NORTH SCITUATE RI 02857-1237

Why did I receive this notice?

We received your request for a Certificate of Good Standing and/or Tax Compliance for TETRAMED LLC. As of the date of this notice, the Commissioner of Revenue is unable to certify whether you are in compliance with your tax obligations under Chapter 62C of the Massachusetts General Laws.

According to our records, you're not registered with the Department of Revenue. As a result, we don't know if you have any outstanding liabilities. We're also unable to determine if you're legally required to file and pay taxes in Massachusetts.

What if I have questions?

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

Visit us online!

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

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

Use the confirmation code below to print another copy of this letter or to review your submission.
Confirmation Code: qfqpvz

Edward W. Coyle, Jr., Chief
Collections Bureau



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

William Francis Galvin
Secretary of the
Commonwealth

September 14, 2018

TO WHOM IT MAY CONCERN:

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

TETRAMED LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **February 27, 2018**.

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

I also certify that the names of all managers listed in the most recent filing are: **NONE**

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

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



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

TetraMed LLC

Diversity Plan

TetraMed's Diversity Plan will promote equity among minorities, women, veterans, people with disabilities, and LGBTQ+.

Diversity Mission

TetraMed's Diversity Mission is to encourage the company and the host community in whole to support the Diversity Plan. Employees, with the support of the host community, will adhere to specific and measurable goals at the company – promoting equity for minorities, women, veterans, people with disabilities, and LGBTQ+, in the operation of TetraMed's proposed Marijuana Establishment.

Vision

TetraMed will strive to build a staff that reflects the diversity of the community and our country. We will build lasting relationships with people from diverse backgrounds and will aspire to be a leader in promoting inclusion, equity and community engagement. We believe that our commitment to promoting diversity will inspire exceptional employee performance, enhance patient and customer experience and contribute to financial viability.

Three Goals

1. Develop an inclusive pool of candidates from which to select a workforce, provide resources to promote employee success;
2. Recruit, hire and retain a diverse management and executive team; and
3. Conduct and build business relationships with a diverse pool of vendors and contractors.

Programs

Goal No. 1: Develop an Inclusive Pool of Candidates & Promotion of Employee Success

TetraMed will strive to develop and maintain a diverse pool of candidates for participation in the business of cultivation. Our intent is to build a workforce that is reflective of the demographics of our community. We will strive to create a workforce that includes minorities, women, veterans, people with disabilities, and LGBTQ+ in numbers at least equal to those present within the community at large, if not more. We will conduct an analysis of the surrounding area using public and private resources and will endeavor to improve our understanding of the community.

TetraMed will develop and implement several strategic initiatives to secure and maintain a diverse and qualified group of employees. These initiatives will include, at a minimum, the following:

- Twice annually, TetraMed will host career fairs in underrepresented and minority communities – specifically Worcester and Fitchburg.
- TetraMed’s workforce will be comprised of at least 20% of individuals who are African-American/Black and/or Hispanic or Latino descent, women, veterans, farmers, and people with drug convictions.
- TetraMed will utilize online resources such as indeed.com, zip recruiter.com and social media platforms such as Facebook and Twitter to cast a wide search for diverse employees.
- TetraMed will interact with local chambers of commerce and civic organizations to build relationships with diverse segments of the business community.
- TetraMed will create and distribute internal workplace newsletters to encourage current employees to recommend individuals that might advance the diversity and business performance objectives of the company. Newsletters will communicate the company’s Referral Program, and content may include incentive opportunities such as earning paid time off for family, educational bonuses, or charitable gift giving on behalf of the referring employee. Newsletters will be distributed at a minimum of twice annually via email and/or as a printed flyer to employees – depending on the hiring needs and goal measurements of the company.
- TetraMed will plan to contract with at least 20% of local and national suppliers that demonstrate a commitment to diversity and inclusion – such as horticultural, administrative, office, construction, and operational supply companies.
- TetraMed believes that not all employee candidates may have access to the internet. Through partnering with childcare, transportation, human services and other local organizations, TetraMed will lead an effort to identify diverse candidates and overcome traditional obstacles to employment. Through grass roots marketing strategies with local businesses, TetraMed will strive to connect with diverse candidates that might not otherwise be aware of employment opportunities. Communications may include printed flyers or advertisements that would be distributed at local organizations at a minimum of twice annually – depending on the hiring needs and goal measurements of TetraMed.

Goal No. 2: Promote a diverse management and executive team

In order to retain a diverse management and executive team, the company will engage in the activities listed below:

- Develop new partnerships as well as maintain and strengthen current partnerships with culturally diverse institutions such as: local colleges, community organizations and churches, with a specific focus on conducting targeted recruiting and hiring initiatives for potential candidates that will help TetraMed achieve its diversity goals.
- Provide mentoring and career counseling programs and quarterly employment advancement workshop opportunities, in an effort to promote success.
- Provide the following training courses:
 1. Work Essentials (department specific), to occur during orientation with refresher courses offered quarterly;
 2. Career Development, offered twice annually;

3. Safety and Compliance, offered twice annually;
 4. Advancing Technical Skills (e.g. plant science, cultivation techniques, etc.), offered twice annually; and
 5. Advancing Analytical Skills (e.g. financial accounting, inventory management, etc.), offered twice annually.
- Establish procedures for supporting a diverse workforce by providing training (during orientation, and once annually thereafter) on cultural sensitivity and multicultural environments;
 - Establish a consistent process for identifying, screening and interviewing candidates on issues relating to diversity and equity
 - Analyze exit surveys, and develop recommendations to improve retention and quality of staff;
 - Develop a process and procedure to properly document and resolve any matters that may impact the diversity plan
 - Provide mandatory diversity awareness training at orientation immediately upon hiring including discussion of a zero tolerance policy for discrimination, bullying, and harassment
 - Diversity Plan goals will be distributed annually in an employee handbook kept current with best practices and policies, and made available to the entire TetraMed network (employees, vendors and the public)
 - Conduct quarterly progress evaluation meetings with appropriate personnel and targeted presentations to management and personnel on ongoing diversity initiatives.

Goal No. 3: Diverse Vendors and Contractors

In order to promote broad participation in the cannabis sector, the company will:

- Not less than twice annually, participate in community events such as, street fairs, job fairs, and chamber of commerce events;
- Seek out and contract with a minimum of 15% qualified, diverse vendors and contractors;
- Engage in honest conversation with management and staff on a semiannual basis about how best to attract a diverse pool of vendors and contractors; and
- Use print and electronic communication tools, including web and social media such as Facebook and Twitter to share information about the opportunities for collaboration and participation within the company. TetraMed will, on an on-going basis and as product and service needs arise, use the afore-mentioned printed and electronic communication tools to advertise project- and service-based opportunities for diverse vendor and contractor participation. Opportunities may be in the form of purchasing such as procuring contracts for office or facility supplies, technical or IT support, cultivation equipment and/or maintenance, insurance, transportation services, legal or other professional consulting, packaging or marketing-related supplies.

Measurement

TetraMed acknowledges that the Diversity Plan progress and success of the plan, in its entirety, is required to be documented annually upon renewal (renewal occurs one year from provisional licensure whether or not the licensee has a final license).

In order to measure outcomes against the diversity goals of the company, TetraMed's CEO will be responsible for:

- Collecting and analyzing data, including demographic information related to the composition of the workforce, and whether the company's plan is achieving its diversity objectives;
- Measuring the number of individuals from minorities, women, veterans, people with disabilities, and LGBTQ+ who were hired, retained and contracted after the issuance of a license;
- Measuring the number of promotions for minorities, women, veterans, people with disabilities, and LGBTQ+ since initial licensure;
- Measuring the number of positions created since initial licensure;
- Measuring the number and subject matter of trainings held, and track the number of minorities, women, veterans, people with disabilities, and LGBTQ+ in attendance;
- Document the number and natures of employment outreach and community events and the individuals that attended, and retain copies of any materials distributed at such events;
- Publish such employment data, and at least annually, share that data with management;
- Share data with the CNB upon request;
- Develop a written plan for continuous improvement; and
- Create a Diversity Committee comprised of management, employees, and a diverse group of community stakeholders.

Affirmative Statement

In accordance with the Guidance on Required Positive Impact Plans and Diversity Plans (revised 2/25/19), TetraMed affirmatively states as follows: (1) The applicant acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and (2) Any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

Maintaining of Financial Records

TetraMed's ("TM") operating policies and procedures ensure financial records are compliant with the CCC's Adult Use of Marijuana regulations (935 CMR 500) and are accurate and maintained. Financial records maintenance measures include policies and procedures requiring that:

- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
 - Keeping written business records in accordance with generally accepted accounting principles, are available for inspection, and include manual or computerized records of:
 - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Salary and wages paid to each employee and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a marijuana establishment, including members, if any;
 - Monetary transactions;
 - Assets and liabilities; and
 - Sales records including the form, quantity, and cost of marijuana products.

- Confidential information will be kept separate from all other records, maintained in a secure location, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the CCC may access this information to carry out its official duties.

- All sales recording requirements under 935 CMR 500.140(6) are followed, including:
 - Maintaining such records that would allow for the CCC and the DOR to audit and examine the point-of-sale system used to ensure compliance with Massachusetts tax laws and 935 CMR 500;
 - Conducting a monthly analysis of its equipment and sales date, and maintaining records that the monthly analysis has been performed, which will be available to the CCC upon request;
 - Utilizing a point-of-sale (POS) system approved by the CCC, in consultation with the DOR, and a sales recording module approved by DOR;
 - Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements; and
 - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.

- Additional written business records will be kept, including, but not limited to, records of:
 - Fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the CCC's regulations;
 - Fees paid under 935 CMR 500.005 or any other section of the CCC's regulations; and
 - Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16).

Executive Management

Chief Executive Officer: The CEO shall provide overall leadership and vision for TetraMed (“TM”). The CEO will work with and support the executive management team and employees to assure that TM is setting reasonable business and community benchmarks, achieving its goals and fulfilling its mission. CEO duties shall include the following:

- Develop, oversee and execute a staffing plan and certain hiring protocols;
- Develop and implement personnel policies and procedures;
- Develop protocols to attract, hire, advance, discipline and terminate employees and volunteers as needed to support TM’s operations;
- In conjunction with the CCO, oversee compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Ensure compliance with all workplace policy laws and requirements;
- In collaboration with the Chief Compliance Officer, oversee compliance with Massachusetts law and regulations, including 935 CMR 500.000 et seq.;
- In conjunction with the CCO, oversee ongoing compliance with the provisions of 935 CMR 500.101(2)(e)(8);
- In conjunction with the CCO, oversee operating procedures to assure ongoing compliance with the provisions of 935 CMR 500.105(1);
- Working with the executive management team and the COO/GM, implement a plan to prevent the diversion of product in accordance with the applicable regulations, including 935 CMR 500.101 and 935 CMR 500.105;
- Working with the executive management team and the GM, implement a diversity plan to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientations;
- Ensure that such anti-diversion plan incorporate the use of video monitoring, employee training, written guidance to employees, executive supervision and physical inspection of the premises, among other tactics;
- Ensure that each member of the executive management team shall attest by his signature that he has read and understands the requirements of 935 CMR 500.000 et seq., and shall keep a copy of such attestation within the books and records of TM;
- Lead TM’s interactions with state regulators and municipal officials; and
- Working as the team leader with other executives and employees, to review TM’s business and community objectives, and implement plans to achieve those objectives.

Chief Operating Officer/General Manager: The COO shall operate and be responsible for maintenance, staffing and ongoing operation of the cultivation facility. COO duties shall include the following:

- Oversee policies and procedures relating to the cultivation facility;
- In collaboration with the CCO, oversee background check process on all employees in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.000;

- Coordinate all cultivation staff work hours, assignments and collaborations;
- Develop plan to meet the demands of the business;
- Human resources management;
- Operations and process design;
- Working with the CEO, manage financial reporting & budgeting;
- Manage payroll administration;
- Oversee accounting and payables functions
- In conjunction with CEO and contract Certified Tax Accountant, oversee tax preparation and auditing
- Oversee the training of cultivation employees in an ongoing capacity;
- Provide mandatory training for new cultivation employees;
- Maintain a record of space allocations;
- Work with cultivation staff to promote successful operations in all TM cultivation facilities;
- Maintain a database of environmental controls and conditions;
- Provide pesticide control strategies and ensure IPM program effectiveness; and
- Ensure quality control and testing of marijuana flower in compliance with 935 CMR 500.160.

Chief Security Officer: The CSO is responsible for implementing security policies and procedures for TM. The CSO will maintain, implement, review and amend such policies as required by the business.

CSO duties shall include the following:

- Ensure compliance with all provisions of 935 CMR 500.110;
- Review and ensure proper maintenance of all security apparatus, including physical, human and technological security methods and equipment;
- Interact with state inspectors and municipal law enforcement authorities;
- Train and supervise security staff;
- Develop a plan for educating employees on the strict anti-diversion policy at TM;
- Develop, review and supervise the process through which TM will report security incidents;
- Prepare reports, in written and electronic form, relative to the maintenance of security at TM, and generate any reports required by regulation to be provided to state regulators or law enforcement;
- Maintain current list of all authorized and registered employees working for TM;
- Maintain current list of all employees authorized to access designated areas of the facility;
- Lead a working group comprised of the CEO, CCO, CPO and any other designated personnel to ensure that current policies and procedures are properly implemented, integrated, effective, and relevant to ensure the safety of TM employees and assets;
- Work with the CS to ensure that all personnel complete and satisfy all background checks requirements prior to performing any TM functionality; and
- Provide staffing, shift change and general oversight of security operations.

- In the event of any suspected diversion incident, perform an internal audit, referencing video surveillance, and product tracking software, to locate the time, place and agent involved with the discrepancy, and document and report in accordance with 935 CMR 500.110(1)(m).

Chief Compliance Officer: The CCO's duties shall include the following:

- In collaboration with the CEO, uphold company and facility compliance with Massachusetts law and regulations, including 935 CMR 500.000 et seq.;
- In collaboration with the CEO, facilitate TM's interactions with state regulators and municipal officials;
- Ensure compliance with 935 CMR 500.105(2)(b), including all Responsible Vendor Training requirements for employees;
- Prepare and amend from time to time a TM plan to assure ongoing compliance with the provisions of 935 CMR 500.101(2)(e)(8);
- Prepare and amend from time to time a set of detailed written operating procedures to assure ongoing compliance with the provisions of 935 CMR 500.105(1);
- Keep and maintain all TM records, and making such records available for inspection by the Commission, upon its request, in accordance with 935 CMR 500.105(9);
- In collaboration with the CSO, implementing and administering background checks and suitability determinations on all TM employees in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.000;
- Reviewing background checks prior to any employee commencing work, and prior to any employee being granted access to any TM facility in a manner consistent with Massachusetts law and regulation, including 935 CMR 500.100;
- Registering each employee with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04 for purposes of determining suitability.
- For purposes of further ensuring employee suitability, the CSO shall:
 - a. Review any and all conditions, offenses, and violations occurring in Massachusetts or any other state, whether under state law or under the laws of the United States, or the law of any military, territorial or Native American tribal authority, or any other jurisdiction.
 - b. Review any and all criminal disqualifying conditions, offenses, and violations, including the crimes of attempt, accessory, conspiracy, and solicitation.
 - c. Where applicable, review all look back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look back period will commence upon release from incarceration.
 - d. Exclude from consideration any juvenile dispositions as a factor for determining suitability.
 - e. Analyze all background checks to Massachusetts law, including but not limited to 935 CMR 500.800, inclusive of all tables and exhibits.

- f. Not less frequently than monthly, consult the Commission for purposes of determining any change of law, regulation or guidance, and to determine any change in recommended best practice.
- g. Administer the TM background check protocol, in accordance with Massachusetts law and regulation, and any guidance provided by the CCC from time to time, including 935 CMR 500.802 and related tables.
- h. Determine whether grounds exist for Mandatory Disqualification or Presumptive Negative Suitability Determination and, in the event a Presumptive Negative Suitability Determination is made, TM will consider the following factors: (i) time since the incident; (ii) age of the subject at the time of the incident; (iii) nature and specific circumstances of the incident; (iv) sentence imposed and length, if any, of incarceration, if criminal; (v) penalty or discipline imposed, including damages awarded, if civil or administrative; (vi) relationship of offense or incident to nature of work to be performed; (vii) number of offenses or incidents; (viii) whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered; (ix) if criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and (x) any other relevant information, including information submitted by the subject.

Upon finding an adverse determination, a Compliance Specialist shall:

- Report the adverse finding to the CSO immediately;
- Within seven (7) days of such determination, provide the applicant a copy of the background screening report and a final adverse determination letter providing the applicant with instruction relative to the right to dispute the contents of the report and rights to supplement or pursue an appeal to the Suitability Review Commission;
- Document such adverse determination in compliance with all requirements set forth in 935 CMR 500 et seq.; and
- Maintain such determination within TM personnel records.

Head of Cultivation: The HoC is responsible for handling all cultivation processes and post-harvest product. In collaboration with the COO and CCO, the HoC's duties shall include the following:

- Implement all policies and procedures relating to the cultivation facility;
- Coordinate repairs and maintenance;
- Perform routine maintenance and oversight of cultivation equipment, including tables, lights, HVAC, and irrigation and nutrition systems;
- Supervise and train cultivation employees in an ongoing capacity;

- Adjust all mechanical systems and cultivation operations for optimum efficiency and production;
- Develop harvest schedules;
- At the direction of the CCO, supervise Cultivation Specialists in all cultivation tasks, including the application of pesticides;
- Monitor, inventory, purchase and store all cultivation supplies and order such supplies as needed; and
- Supervise handling and transporting all harvested plants from cultivation rooms to the trim room;
- Supervise handling, transporting and disposing of all waste material from cultivation rooms;
- Supervision of trim and production capabilities;
- Delegation of tasks to Trim Specialists;
- Ensure quality control and testing of marijuana infused products in compliance with 935 CMR 500.160;
- Monitor the status of the dry room and all product in the process of drying;
- Record wet and dry weight for all product including flowers and trim;
- Oversee bulk packaging, transfer and storing in product vault;
- Preparation of product for the wholesale market;
- In collaboration with Inventory Manager and AIAs, develop procedures for inventory management, including electronic tracking and the allocation of physical space, shelves and containers within the premises including inventory protocols in compliance with 935 CMR 500.105(8) and (9); and
- In collaboration with Inventory Manager and AIAs, develop product scheduling to support sales and product development objectives.

Inventory Manager: At least weekly, the IM shall record an inventory count, and shall report the same to the CCO. Additional IM duties shall include the following:

- Develop and implement comprehensive inventory controls;
- Develop and implement comprehensive reporting policies to meet internal and external reporting requirements;
- Maintain all inventory records;
- Staffing and supervising all AIAs;
- Handle, store, label and track all inventory; and
- Working with the CCO and CSO, implement safe and compliant transportation protocols, including but not limited to compliance with 500.050(5)(a);

Please see next page

Employees¹

Cultivation Specialist: Cultivation Specialists are responsible for all tasks assigned by the CCO. A Cultivation Specialist shall report directly to CCO, or by designation of the CCO, to ACAs. Responsibilities include, but are not limited to:

- Nutrition, water and irrigation;
- Cleaning and sterilizing;
- Pruning and potting;
- Application of pesticide and pest control;
- Plant and media monitoring for mold and pest;
- Propagation; and
- Table and equipment assembly.

Associate Security Agent: ASAs monitor TM's security systems. ASAs shall perform the following duties:

- Monitor alarm systems, doors, interior and exterior video cameras, motion sensors and related technology;
- Assure that all employees and others accessing the facility have the appropriate credentials and identification;
- Assure that only properly authorized individuals are able to gain access to the facility;
- Lead TM's response in the event of fire, theft, intrusion or other threat to health and safety at the facility;
- Respond and investigate security situations and alarm calls;
- Clearly document the incident and details surrounding the incident in a written report for the CSO;
- Monitor all employee and public entrances to the facility;
- Maintain log books for employees and the public; and
- Provide escorted access as required in restricted areas.

Associate Inventory Agents: AIAs support the daily functionality of the Inventory Manager. AIA duties shall include:

- Maintaining all records relating to inventory, including storage, transfer, audit, package, inventory levels and demand, and other records as required by the business;
- Documenting the acquisition, sale, disposal and ending inventory counts on a daily and monthly basis;

¹ As used in these Personnel Policies and Procedures, the term "employee" shall mean all registered agents, board members, directors, employees, executives, managers and volunteers or associated with any TM facility, as further defined at 935 CMR 500.030(1), but shall not include third-party contractors. The pronouns "he" and "his" will refer to persons of both genders.

- Ensuring that product is properly packaged, stored, labeled, maintained and recorded within TM's electronic and physical systems; and
- Ensuring proper storage and disposal of waste in accordance with 935 CMR 500.105(12).

Trim Specialists: Trim Specialists are responsible for post-harvest trimming of marijuana plants, both mechanical and manual. Trim Specialists report directly to the CPO and are responsible for:

- Receiving daily tasks from the CPO;
- Assisting in the harvest of marijuana;
- Trimming marijuana plants;
- Maintaining a sterile environment in the Trim Room;
- Cleaning and maintaining scissors and trim machines; and
- Ensuring proper storage and disposal of waste in accordance with 935 CMR 500.105(12).

Personnel Records

Personnel records for each employee will be maintained for at least twenty-four (24) months after employee separation from the company. Personnel records shall include, but not be limited to, the following:

- Job description stating duties, authority, responsibilities, qualifications, and supervision;
- Employment agreement, if any;
- Documents related to employee training, including training regarding privacy and confidentiality requirements, and a signed statement of the employee indicating the date, time, and place of such training;
- Documentation relating to compensation, including a statement of graduated compensation by date and pay rate;
- Performance evaluations;
- Disciplinary records, if any;
- Documents relating to background investigation, including CORI reports; and
- All materials required by the Commission pursuant to 935 CMR 500.030(2).

Personnel records will be kept in a secure location to maintain confidentiality and be accessible only to the CEO or designees, all of whom shall be members of the executive management team.

Professional Conduct

Standards of Conduct

TM is committed to maintaining an environment conducive to the health and wellbeing of customers, employees and the community. TM shall endeavor to provide a workplace free from harassment, bullying or discrimination. TM will not tolerate harassment or discrimination on the basis of sex, race, color, national origin, age, religion, disability, sexual orientation, gender identity or any other trait or characteristic protected by law. Harassment or discrimination on the basis of any protected trait or characteristic is contrary to TM's values and shall provide grounds for discipline, up to and including termination. TM policies shall prohibit any physical or verbal conduct that:

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

All TM employees shall maintain the highest degree of professional behavior. Harassment or discrimination by or against employees is strictly prohibited, and the CEO shall promptly address any offending conduct.

At-Will Employment

Unless otherwise specified in a signed writing executed by the CEO and the employee, employment at TM shall be at-will. The employer and employee alike may terminate the work relationship at any given moment and for any legitimate purpose. Each party reserves the right to end the employment.

Workplace Attire

Workplace attire must be suitable for each specific role and task. The CEO and the executive team shall determine appropriate attire, and shall ensure compliance with all workplace attire requirements.

Business Hours

Monday: 24 hours
Tuesday: 24 hours
Wednesday: 24 hours
Thursday: 24 hours
Friday: 24 hours
Saturday: 24 hours
Sunday: 24 hours

After hours contact information:

CEO

Phone: (401) 919-7202
Email: mb.glassco@gmail.com

CSO

Phone: (202) 441-9348
Email: ryanwinmill@winmillgroup.com

Please see next page

Compensation and Employment Practices

Standard Employment Practices

TM offers competitive wage and benefits packages, and shall develop a workplace culture that values work-life balance, transparent and accessible management, and a work ethic consistent with the cannabis program in Massachusetts.

Compensation

Compensation shall be negotiated on an individual basis. TM shall determine compensation based on the prevailing wage in the marketplace. Compensation shall account for skill, experience, education, work history and other lawful criteria as determined by TM. The CEO and the executive management team shall determine compensation rates. TM shall at all times comply with applicable state and federal law in determining employee compensation.

Compliance with Law and Regulation

TM's written policies shall adhere to applicable federal and state laws, including but not limited to the Family and Medical Leave Act, the Consolidated Omnibus Budget Reconciliation Act, the Equal Employment Opportunity Act, the Employee Retirement Income Security Act, the Americans with Disabilities Act, 935 CMR 500.000 et. seq., and with laws pertaining to holidays, work hours, personal time, paid time off, confidentiality and workplace safety. The executive management team oversees company compliance, and the CEO shall implement company policies and procedures.

Work Schedules

Work schedules shall be part-time or full-time. Schedules will be set and classified according to the demands of the business. TM shall develop and implement work schedules that provide necessary duty and personnel coverage. TM shall determine work schedules to ensure adequate coverage on a daily basis, and to diminish the likelihood of duplicate staffing or overtime coverage.

Performance Reviews

At least annually, all employees shall receive performance reviews. A written review, in a form determined by the CEO, shall accompany each employee review. Such review shall be signed by the employee, and shall be retained in the personnel files of the company. As determined by the CEO, reviews shall provide a reasonable evaluation of employee performance, and may include scoring metrics, narrative content and other performance methodologies.

Vacation, Paid Leave and Family Leave Policies

TM leave policies will comport with all applicable state and federal statutes. All full-time employees will receive two 40-hour weeks of paid vacation annually. Leave must be requested at least two weeks in advance and approved by the CEO or designee. TM

anticipates observing all national holidays, and will elect on an annual basis whether to observe state holidays.

Disciplinary Policy

TM has adopted a disciplinary policy designed to provide a graduated series of corrective actions. This policy, called the “Steps” policy, is intended to improve employee performance, promote the maintenance of a cohesive and productive workplace, and prevent recurring adverse behaviors. In addressing disciplinary matters, TM shall apply the steps described below:

Step 1: Individual Advice and Counsel

A member of the executive management team shall individually discuss the subject conduct with the employee. The executive shall identify the offending conduct, and clearly outline company expectations for resolution.

Step 2: Written Warning

Within seven (7) days of the discussion described in Step 1, the executive will prepare a document characterizing the discussion, and will provide a copy of the document to the employee. The employee will sign the document, a copy of which TM will maintain in the personnel file.

Step 3: Final Written Warning

Should the offending conduct persist or reoccur, a member of the executive management team will prepare a document characterizing the offending conduct, and will provide a copy of the document to the employee. The document may include witness statements or reference other evidence. The document will state “Final Warning” in prominent text. The employee will sign the document, a copy of which TM will maintain in the personnel file. If the executive finds the offending conduct problematic, disruptive and/or harmful, or implicates the health or safety of other employees, the executive may recommend to the CEO that the employee be removed from the workplace. The CEO shall act on any such recommendation within forty-eight (48) hours.

Step 4: Termination of Employment

The last step is termination of employment. TM reserves the right terminate if, notwithstanding the steps set forth above, employee conduct fails to comport with TM policies and procedures. TM reserves the right to terminate without prior notice or disciplinary action. The CEO must approve termination in writing, a copy of which TM will maintain in the personnel file.

Nothing in this policy provides any contractual rights regarding employee discipline or counseling, nor shall anything in this policy be construed as modifying or altering the at-will employment relationship established between TM and its employees.

Conduct Not Subject to “Steps” Disciplinary Policy

Illegal behavior is not subject to the “Steps” policy, and may be reported to local law enforcement. Intoxication, physical harassment, sexual harassment, bullying, theft, misappropriation of intellectual property and like behaviors shall not be subject to the “Steps” policy and may be grounds for immediate termination.

Separation of Employment

A separating employee may contact the CEO or other supervising authority to schedule an exit interview. TM reserves the right to refuse any such interview. The interview, if any, shall occur on or after the employee’s last day of work.

Company Property

A separating employee must return all company property at the time of separation, including but not limited to uniforms, cell phones, keys, computers, and identification cards. Failure to return items may result in deductions from final paycheck. An employee may be required to sign a wage deduction authorization form to facilitate the deduction of the cost of unreturned items from the final paycheck.

Termination of Employee Benefits

An employee separating from TM is eligible to receive benefits as long as the appropriate procedures are followed as stated above. Two weeks’ notice must be given, and the employee must work the full two work weeks. Accrued vacation leave will be paid in the last paycheck. Accrued sick leave will be paid in the last paycheck.

COBRA Health Insurance

Health insurance terminates on the last day of the month of employment, unless employee requests immediate termination of benefits. TM shall provide information about employee rights under the Consolidated Omnibus Budget Reconciliation Act (COBRA) relative to the continuation of health insurance coverage.

Qualifications and Training

All employees hired to work at the TetraMed (the “Company”) facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

Qualifications

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

In accordance with the provisions of 935 CMR 500.802, the Company will ensure that its employees are suitable for registration. In the event that the Company discovers any of its agents are not suitable for registration as a marijuana establishment agent, the agent’s employment will be terminated, and the Company will notify the CCC within one (1) business day that the agent is no longer associated with the establishment.

Training

On or after July 1, 2019, all of the Company’s current owners, managers, and employees will have attended and successfully completed a Responsible Vendor Program (RVP) operated by an education provider accredited by the CCC. The Company will provide the annual minimum of two hours of responsible vendor training to marijuana establishment agents.

The Company’s new, non-administrative employees will complete the RVP within 90 days of the date they are hired. The Company’s owners, managers, and employees will then successfully complete the program annually thereafter.

The Company’s records of responsible vendor training program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the CCC and any other state licensing authority upon request.

To help ensure compliance, the Company will encourage administrative employees who do not handle or sell marijuana to take the RVP on a voluntary basis.

The Company’s agents will receive training on a variety of topics relevant to marijuana establishment operations, including but not limited to the following:

1. Marijuana’s effect on the human body, including physical effects based on different types of marijuana products and methods of administration, and recognizing the visible signs of impairment;
2. Best practices for diversion prevention and prevention of sales to minors;
3. Compliance with tracking requirements;

4. Acceptable forms of identification, including verification of valid photo identification and medical marijuana registration and confiscation of fraudulent identifications;
5. Such other areas of training determined by the CCC to be included; and
6. Other significant state laws and rules affecting operators, such as:
 - Local and state licensing and enforcement;
 - Incident and notification requirements;
 - Administrative and criminal liability and license sanctions and court sanctions;
 - Waste disposal and health and safety standards;
 - Patrons prohibited from bringing marijuana onto licensed premises;
 - Permitted hours of sale and conduct of establishment;
 - Permitting inspections by state and local licensing and enforcement authorities;
 - Licensee responsibilities for activities occurring within licensed premises;
 - Maintenance of records and privacy issues; and
 - Prohibited purchases and practices.

As required by 935 CMR 500.105(2), and prior to performing job functions, each of the Company's agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent's job function. Agent training will at least include the RVP and eight (8) hours of on-going training annually.

TetraMed LLC

Quality Control and Testing Procedures

TetraMed aims to provide customers with adult use cannabis of the highest quality. TetraMed shall implement strict operational controls, maintain a sanitary and secure environment, conduct rigorous quality testing and utilize a CNB-approved independent laboratory testing facility. All products shall be cultivated at TetraMed's facility in Gardner and tested in accordance with CNB requirements.

Facility

To ensure and maintain on going sanitary operations at the cultivation facility, TetraMed will always maintain adequate space for placement of equipment and storage of materials. Additionally, all floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair. TetraMed will provide employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair.

TetraMed's water supply will be sufficient for necessary operations. All plumbing for the facility shall be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the facility.

All plumbing will properly convey sewage and liquid disposable waste from the facility. There will be no cross-connections between the potable and waste water lines.

Waste disposal

All operational systems for waste disposal will maintain strict adherence to all standards defined under 935 CMR 500.105(12).

All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, shall be stored, secured, and managed in accordance with all applicable state and local statutes, ordinances, and regulations. ¹

¹ including but not limited to, for discharge of pollutants into surface water or groundwater (Massachusetts Clean Waters Act, M.G.L. c. 21 §§ 26 through 53; 314 CMR 3.00: Surface Water Discharge Permit Program; 314 CMR 5.00: Groundwater Discharge Program; 314 CMR 12.00: Operation Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Dischargers; the Federal Clean Water Act, 33 U.S.C. 1251 et seq., the National Pollutant Discharge Elimination System Permit Regulations at 40 CFR Part 122, 314 CMR 7.00: Sewer System Extension and Connection Permit Program), or stored pending disposal in an industrial wastewater holding tank in accordance with 314 CMR 18.00: Industrial Wastewater Holding Tanks and Containers.

Organic material, recyclable material and solid waste generated at the facility shall be redirected or disposed of in accordance with the waste disposal bans described at 310 CMR 19.017: *Waste Bans*. Additionally, to the greatest extent feasible:

- a. Any recyclable material as defined in 310 CMR 16.02: *Definitions* shall be recycled in a manner approved by the Commission; and
- b. Any remaining marijuana waste shall be ground and mixed with other organic material as defined in 310 CMR 16.02: *Definitions* such that the resulting mixture renders the marijuana unusable. Once such marijuana waste has been rendered unusable, the mixture will be composted or digested at an aerobic or anaerobic digester at an operation that is in compliance with the requirements of 310 CMR 16.00: *Site Assignment Regulations for Solid Waste Facilities*.

Once the cannabis waste has been rendered unusable, it will be brought to a solid waste transfer facility or a solid waste disposal facility that holds a valid permit issued by the Department of Environmental Protection. Such transfer will be accompanied by not less than two authorized agents. Tetra Med will maintain a written record of the date, the type and quantity disposed of, the manner of disposal, the location of disposal, and the names of the two agents present during the disposal, with their signatures. All records be maintained and kept on premises for at least three years.

Litter and waste shall be properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests.

Safe Handling

TetraMed is committed to cultivating in a manner consistent with the industry standard. Pursuant to 935 CMR 500.0105(3)(c) TetraMed will exclusively process the leaves and flowers of the female marijuana plant only. All marijuana processed from female plants shall be; (i) well cured and generally free of seeds and stems; (ii) free of dirt, sand, debris, and other foreign matter; (iii) free of contamination by mold, rot, other fungus, and bacterial diseases; (iv) always prepared and handled on food-grade stainless steel tables; and (v) packaged in a secured area monitored by 24/7 video surveillance.

Any agent working in direct contact with preparation or processing of marijuana products shall conform to sanitary practices while on duty. Such practices shall include but not be limited to the following items:

- a. Maintaining adequate personal cleanliness; and
- b. Washing hands thoroughly at a designated hand-washing station; (i) prior to beginning a

shift; (ii) before clocking out for breaks; (iii) upon returning from a break; and (iv) at any other time when hands may have become soiled or contaminated.

Pursuant to 935 CMR 500.105(3)(b)(10), any and all toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products.

Quality Control

TetraMed has developed internal quality control protocols to ensure high-quality products free from any contaminants. These protocols include, but are not limited to, limiting direct or indirect contact with product or product-facing surfaces, use of gloves and gowns where appropriate, as well as strict hand hygiene practices. All cultivation and storage areas will be cleaned and monitored daily for signs of contaminants such as mold, fungus and pests. If contamination occurs, TetraMed staff will remedy the contamination, relying on individual staff expertise, industry best practice and peer support.

TetraMed will meet or exceed the sanitary guidelines established by 935 CMR 500.160. Staff will use locker rooms to transition into uniforms and store personal belongings before entering the cultivation areas. TetraMed will deploy hand washing stations, antiseptic foot baths, hair and beard nets, and other tools to promote sanitation.

TetraMed's Standard Operating Procedures will contain but not be limited to the following specific quality control and sanitary standards:

1. All TetraMed agents working with any marijuana product, including cultivation, processing, or packaging, shall adhere to the requirements for food handling provided in 105 CMR 300.000. All products will be prepared, handled, and stored in compliance with the sanitary requirements provided in 105 CMR 500.000 and 105 CMR 300.000.²
2. TetraMed hand-washing facilities will be located in cultivation, processing and packaging areas, and will include hand-cleaning and sanitizing devices, along with sanitary towel, paper towel or other air-drying devices.
3. TetraMed will ensure that all utensils, tools, equipment and surfaces are maintained in a clean and sanitary condition, and that all cultivation equipment, nutrients, soils and tools will be handled in a manner to diminish the likelihood of contamination.
4. TetraMed will ensure that all marijuana is stored in a manner with adequate lighting, ventilation, temperature, humidity, space, and equipment, in conformity with 935 CMR 500.105(11).

² 935 CMR 500.105(3)(c) refers to compliance with Minimum Sanitation requirements for Food Establishments, such regulatory requirement is not applicable to this proposed facility. TetraMed is applying for a cultivation license and has no intention of producing MIP's at this facility.

5. TetraMed shall ensure that the storage and transportation of finished product(s) shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
6. All marijuana not passing laboratory testing standards will be reported to the commission and disposed of in compliance with 935 CMR 500.105(12). A log of any such incident will be kept on premises and made available to the commission upon request.

Testing

TetraMed will not sell or otherwise transfer or use marijuana that is not capable of being tested by an independent testing laboratory, except as allowed under 935 CMR 500.000. No marijuana will be sold or otherwise transferred or used unless it has first been tested by an independent testing laboratory and deemed to comply with the standards established under 935 CMR 500.160.

All TetraMed marijuana products shall be tested by an independent testing laboratory in accordance with 935 CMR 500.160(1). TetraMed shall notify the CNB within 72 hours of any laboratory testing results indicating contamination, or that such contamination cannot be remediated. TetraMed will remedy any such contamination in accordance with 935 CMR 500.160 and shall sequester and destroy any contaminated product in accordance with 935 CMR 500.105(11) and 935 CMR 500.160. Any such notification to CNB will describe a plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

All transportation of marijuana to and from any Independent Testing Laboratory that tests any TetraMed product shall comply with 935 CMR 500.105(13).

All testing results shall be maintained in accordance with 935 CMR 500.160(1), (2) and (3), and shall retain all test results for not less than one year.

TetraMed will ensure that all marijuana storage at any laboratory that tests TetraMed product shall comply with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12).

Recordkeeping Procedures

TetraMed (the “Company”) policies and procedures for recordkeeping and record-retention will comply with all CCC regulations to safeguard and maintain vital documents. Upon request or by audit, the Company will provide written records to the CCC. Under supervision of the Chief Compliance Officer, working with the HR Manager and Inventory Manager, TetraMed will file records in a secure, limited access area.

The Company will employ a quarterly review of all retained records to insure compliance. This review will include corporate, employee and business documents. Under direct supervision of the Chief Compliance Officer, the procedures will also be kept current and internally inspected by the executive management team as a part of overall facility maintenance, conducted annually.

- **Marijuana Testing**
 - The Company will maintain the results of all testing for a minimum of one (1) year.
- **Seed-to-Sale Tracking Records**
 - Inventory records will include, at a minimum, a summary of the inventory findings, the date of the inventory, and the names, signatures, and titles of the individuals who conducted the inventory.
 - Using Metrc seed to sale software, the Company will be able to maintain real-time inventory. Metrc inventory reporting meets the requirements specified by the CCC and 935 CMR 500.105(8)(c) and (d), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
- **Transportation Records**
 - The Company will retain all shipping manifests for a minimum of one (1) year and make them available to the CCC upon request.
- **Agent Training Records**
 - Documentation of all required training, including privacy and confidentiality requirements, the topics discussed and the name and title of the presenter(s), and a signed statement of the individual indicating the date, time, and place he or she received the training.
- **Business Records**: Business records require ongoing maintenance and updates. These records can be hard copy or electronic (preferably electronic) and include, at minimum:
 - Books of accounts, which will include ledgers, journals, and supporting agreements, documents, checks, invoices, and vouchers;
 - Sales records including the cost, form, and quantity of marijuana products;
 - Salary and wages paid to each agent, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with TM, including members, if any;
 - Monetary transactions; and

- Assets and liabilities.
- Corporate Records: are those records that require updates, renewals, and annual reviews, at a minimum, including:
 - Local Compliance:
 - As-Built Drawings
 - Certificate of Occupancy
 - Site Plan Approvals
 - Special Permits
 - Variances
 - Corporate Governance:
 - Secretary of State Filings
 - Annual Report
 - CCC Requirements:
 - Annual Marijuana Establishment Registration
 - Annual Agent Registration
 - Third-Party Laboratory Contracts
 - Insurance Coverage:
 - Directors & Officers Policy
 - Employer Professional Liability Policy
 - General Liability Policy
 - Product Liability Policy
 - Umbrella Policy
 - Workers Compensation Policy
- Incident Reporting Records
 - Within ten (10) calendar days, the Company will provide written notice to the CCC of any incident described in 935 CMR 500.110(7)(a), by submitting an incident report, detailing the incident, the findings, the investigation resolution (if any), confirmation that the Police Department and CCC were notified within twenty-four (24) hours of discovering the breach, and any other relevant information. Reports and supporting documents, including surveillance video and photos related to a reportable incident, will be maintained by the Company for no less than one year or the duration of an open investigation, whichever is longer, and made available to the CCC and law enforcement authorities upon request.
- Inventory Records
 - The record of each inventory will include, at a minimum, a summary of the inventory findings, the date of the inventory, and the names, signatures, and titles of the agents who conducted the inventory.
- Personnel Records: These records, at a minimum, include:
 - A staffing plan that will demonstrate safe cultivation conditions, and accessible business hours;
 - Personnel policies and procedures;
 - All background check reports obtained in accordance with 935 CMR 500.030;
 - Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions; and;

- A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with TM and will include, at a minimum, the following:
 - The job description or employment contract that includes authority, duties, qualifications, supervision, and responsibilities;
 - Documentation of verification of references;
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - Notice of completed eight-hour related duty and responsible vendor training;
 - Documentation of periodic performance evaluations;
 - A record of any disciplinary action taken; and
 - All materials submitted to the CCC pursuant to 935 CMR 500.030(2).
- Visitor Records
 - A visitor sign-in and sign-out record will be maintained at the security office. The record will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be accompanying the visitor.
- Security Records
 - Twenty-four (24) hour recordings from all video cameras that are available for immediate viewing by the CCC upon request and that are retained for at least ninety (90) calendar days.
 - A current list of authorized agents and service personnel that have access to the surveillance room will be available to the CCC upon request.
- Written Operating Policies and Procedures: Policies and Procedures related to the Company's operations will be updated on an ongoing basis as needed and undergo an annual review by the executive management team. Policies and Procedures include the following:
 - A list of all executives of the Company, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR 500.105(1)(m) requirement may be fulfilled by placing this information on the Company's website.
 - Description of the various strains of marijuana to be cultivated, sold, or processed, as applicable, as well as the form(s) in which marijuana will be dispensed;
 - A staffing records and staffing plan in compliance with 935 CMR 500.105(9);
 - A description of the Company's hours of operation and after-hours contact information, which will be provided to the CCC, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000;

- Policies and procedures for the handling of cash on Company premises including but not limited to storage, collection frequency and transport to financial institution(s);
- Storage of marijuana in compliance with 935 CMR 500.105(11);
- Agent security policies, including crime prevention and personal safety techniques;
- Security measures in compliance with 935 CMR 500.110;
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old;
- Policies for an alcohol, smoke, and drug-free workplace;
- Quality control plans, including product testing for contaminants in compliance with 935 CMR 500.160;
- Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.160;
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- A plan describing how confidential information will be maintained;
- Policy for the immediate dismissal of any dispensary agent who has:
 - Been convicted, entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority;
 - Diverted marijuana, which will be reported the Police Department and to the CCC; or
 - Engaged in unsafe practices with regard to Company operations, which will be reported to the CCC.
- Policies and procedures for energy efficiency and conservation will include:
 - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants;
 - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - Strategies to reduce electric demand (such as energy storage, lighting schedules, and active load management; and
 - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities.
- Record-Retention

The Company will meet CCC recordkeeping requirements and retain a copy of all records for two (2) years, unless otherwise specified in the regulations.

- Waste Disposal Records

The Company's standard operating procedures ("SOPs") addressing quality control and quality assurance will address how all employees will document and handle the disposal and segregated storage of any medical cannabis that is outdated, damaged, deteriorated, misbranded, or adulterated. Any medical cannabis falling into one of said categories will be reported by the area manager, logged, noted in the Company's inventory tracking seed-to-sale system, quarantined, and disposed of by rendering useless and placed in locked trash compactor. The Company will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the CCC.
- Closure
 - In the event the Company closes, all records will be kept for at least two (2) years at the Company's expense in a form (electronic, hard copies, etc.) and location acceptable to the CCC. In addition, the Company will communicate with the CCC during the closure process and accommodate any additional requests the CCC or other agencies may have.

Restricting Access to Age 21 and Older

TetraMed (the “Company”) will not engage in any marketing, advertising or branding practices that are targeted to, deemed to appeal to or portray people under the age of 21, as compliant with 935 CMR 500.105(4). The Company will not engage in any advertising, marketing and branding by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, unless at least 85% of the audience is reasonably expected to be 21 years of age or older. The Company will not manufacture or sell any edible products that resemble a realistic or fictional human, animal or fruit, including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b).

In accordance with 935 CMR 500.105(4)(a)(5), any marketing, advertising and branding materials for public viewing will include a warning stating, **“For use only by adults 21 years of age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of marijuana.”** Pursuant to 935 CMR 500.105(6)(b), TetraMed packaging for any marijuana or marijuana products will not use bright colors, resemble existing branded products, feature cartoons or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be attractive to minors. The Company’s website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13).

The Company’s cultivation facility will strictly adhere to the security regulations as set forth at 935 CMR 500.110. Prior to gaining access to the cultivation facility individuals must show a photo identification to a camera that is monitored by a security guard to ensure that the individual is over the age 21 and authorized to enter the facility.

The Company will also work with the City of Gardner’s municipal officials, including the police department and the community development board, to assure that no diversion to minors occurs. The Company will work with municipal officials including the police department to ensure that Mass Gen. Law Ch. 161 Sec. 95 pertaining to loitering is strictly enforced. The Company has selected a cultivation location that is in compliance with 935 CMR 500.120 (4). All cultivation, processing and packaging will take place in an area that is not visible by the public.



The Arc
564 Main Street
Fitchburg, MA 01420

T 978-343-6662
F 978-343-8852
www.arcofopportunity.org

Achieve with us.

July 19, 2019

Michael Brickley
CEO/President
Tetramed LLC
33 Rocky Hill Rd
North Scituate RI, 02857

Dear Mr. Brickley,

This letter will confirm that Tetramed LCC has been in conversation with this organization about financial support of our mission. The Arc accepts donations from companies that embrace making a difference in the lives of people with disabilities and their families.

No gifts, good, or services has been received by The Arc of Opportunity in exchange for this letter of verification.

Mary Heafy
President & CEO

TetraMed LLC

Plan to positively impact areas of disproportionate impact

Summary

TetraMed LLC (“TetraMed”) is dedicated to positively impacting communities disproportionately affected by cannabis prohibition and enforcement (hereinafter described as “DPI communities”). TetraMed believes that marijuana establishments have an obligation, both legal and moral, to make significant contributions to support communities that have historically high rates of arrest, conviction, and incarceration related to marijuana crimes.

Plan Goals

TetraMed has adopted a Positive Impact Plan (“Plan”) described herein for the purpose of positively impacting DPI communities. TetraMed has selected the city of Gardner for its proposed marijuana establishment. While the city of Gardner does not fall within an area of disproportionate impact as defined under 935 CMR 500.101(1)(a)(11), or as described in CNB’s “Guidance for Identifying Areas of Disproportionate Impact” dated April 2018, TetraMed intends to positively impact the DPI communities in the area surrounding Gardner, and specifically in Fitchburg. Under the Plan TetraMed will establish the following three goals:

Non-Profit Support. Support non-profit organizations aligned with TetraMed’s goals of community support and inclusiveness.

Hiring. Prioritize the hiring of local workers, giving preference to those individuals from DPI communities in and around Gardner and Fitchburg.

Industry and Career Awareness. Provide cannabis education, industry-specific technical training and mentoring services for individuals facing systemic barriers.

Plan Programs

TetraMed will create three programs designed to meet the goals articulated above. The company will evaluate the programs from time to time, and not less frequently than semi-annually, to measure the degree to which the programs achieve TetraMed’s stated goals.

Non-Profit Support. TetraMed will provide financial contributions to non-profit and community-based organizations within Gardner and Fitchburg. TetraMed will establish a fund derived from the operation of the business, and adopt an application process through which non-profit and community-based organizations can seek these

contributions. TetraMed will prioritize applications from human services organizations that serve people with developmental or behavioral disabilities such as the Arc of Opportunity of North Worcester County in Fitchburg, and those that promote job-readiness such as the Seven Hills Foundation in Gardner (see attached letters).

Hiring. TetraMed will create a hiring preference in favor of DPI communities in Gardner, Fitchburg and the greater northern Worcester county region. In particular, TetraMed is committed to the following actions; (i) host community service days twice a year; (ii) participate in charity events twice a year; (iii) build relationships within regional chambers of commerce and workforce development agencies; (iv) align with educational resources such as community college programs and otherwise reach out to DPI communities to identify and hire suitable employees that meet program characteristics.

Subject to CNB suitability requirements, TetraMed will endeavor to maintain a workforce consisting of not less than 15% of individuals that have endured disproportionate cannabis related law enforcement or employment impacts. Specifically, for both management and staff positions, TetraMed will seek to hire individuals residing in Fitchburg, or those that have lived in Fitchburg for at least five of the last ten years.

Industry & Career Awareness. TetraMed will conduct industry-specific information and career fairs in and around Gardner and Fitchburg. The fairs will feature managers and staff with operational expertise, experts in plant science and agriculture, and people with finance, technology and accounting expertise within the marijuana sector. The fairs will also seek to raise awareness of educational and employment opportunities within the cannabis sector in Massachusetts. TetraMed will conduct such fairs at least twice annually for the first two years of operation, and will assess thereafter the nature and frequency of such programs, but will conduct such programs no less than once annually. Furthermore, and in order to make the cannabis sector accessible to those that have endured disproportionate law enforcement impacts relating to cannabis, TetraMed will provide seminars designed specifically to educate participants in how to seal or expunge criminal records or criminal dispositions in the Massachusetts trial courts.

Plan Measurement and Accountability

At least annually, TetraMed's Chief Executive Officer will create a written report that will evaluate the Plan and its success in advancing the goals of the Plan. In accordance with 935 CMR 500.103(4)(a), the report will detail the following: (i) employment impacts; (ii) number and subject matter of education and training events and seminars conducted; (iii) number of individuals and businesses that participated in such events; (iv) number and nature of mentorship relationships; (v) aggregate data demonstrating the financial impacts of the Plan, including payroll, health care, tax, non-profit contribution, equity and debt performance; and (vi) demographic data reflecting specific positive impacts of the Plan on DPI communities.

At the end of each calendar year, and if TetraMed has not met the Plan goals, the Company will donate \$2,000 to the Social Equity Training and Technical Assistance Fund. If industry and career fair attendance is not 8 participants or more, TetraMed will develop a more targeted plan to reach individuals from Disproportionately impacted communities who are seeking to enter the cannabis space.

Affirmative Statement

In accordance with the Guidance on Required Positive Impact Plans and Diversity Plans (revised 2/25/19), TetraMed affirmatively states as follows:

(1) The applicant acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and (2) Any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.