



# Massachusetts Cannabis Control Commission

## Marijuana Retailer

### General Information:

License Number: MR282468  
Original Issued Date: 05/20/2019  
Issued Date: 04/16/2021  
Expiration Date: 05/20/2022

## ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: In Good Health Inc.

Phone Number: 508-682-1510  
Email Address: DNoble@ingoodhealthma.com

Business Address 1: 1200 West Chestnut Street  
Business City: Brockton  
Business State: MA  
Business Zip Code: 02301

Business Address 2:  
Mailing Address 1: 1200 W CHESTNUT ST  
Mailing City: BROCKTON  
Mailing State: MA  
Mailing Zip Code: 02301

## CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

## PRIORITY APPLICANT

Priority Applicant: yes  
Priority Applicant Type: RMD Priority  
Economic Empowerment Applicant Certification Number:  
RMD Priority Certification Number: RPA201826

## RMD INFORMATION

Name of RMD: In Good Health, Inc.  
Department of Public Health RMD Registration Number: 003  
Operational and Registration Status: Obtained Final Certificate of Registration and is open for business in Massachusetts  
To your knowledge, is the existing RMD certificate of registration in good standing?: yes  
If no, describe the circumstances below:

## PERSONS WITH DIRECT OR INDIRECT AUTHORITY

### Person with Direct or Indirect Authority 1

Percentage Of Ownership: 9.99  
Percentage Of Control:  
Role: Executive / Officer  
Other Role:  
First Name: David  
Last Name: Noble  
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: 50 Percentage Of Control:  
Role: Other (specify) Other Role: Owner and Board Member  
First Name: Andrea Last Name: Noble Suffix:  
Gender: Female User Defined Gender:  
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)  
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: Percentage Of Control:  
Role: Executive / Officer Other Role:  
First Name: Barry Last Name: Kirshner 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: Percentage Of Control:  
Role: Manager Other Role:  
First Name: Rodereck Last Name: Tayag Suffix:  
Gender: Male User Defined Gender:  
What is this person's race or ethnicity?: Asian (Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese)  
Specify Race or Ethnicity: Filipino

Person with Direct or Indirect Authority 5

Percentage Of Ownership: Percentage Of Control:  
Role: Manager Other Role:  
First Name: Long Last Name: Nguyen Suffix:  
Gender: Male User Defined Gender:  
What is this person's race or ethnicity?: Asian (Chinese, Filipino, Asian Indian, Vietnamese, Korean, Japanese)  
Specify Race or Ethnicity:

Person with Direct or Indirect Authority 6

Percentage Of Ownership: Percentage Of Control:  
Role: Manager Other Role:  
First Name: Jordan Last Name: Mello 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 7

Percentage Of Ownership: 25 Percentage Of Control:  
Role: Owner / Partner Other Role:

**First Name:** Gerald                      **Last Name:** Freid                      **Suffix:**  
**Gender:** Male                                      **User Defined Gender:**  
**What is this person's race or ethnicity?:** White (German, Irish, English, Italian, Polish, French)  
**Specify Race or Ethnicity:**

**ENTITIES WITH DIRECT OR INDIRECT AUTHORITY**  
No records found

**CLOSE ASSOCIATES AND MEMBERS**  
No records found

**CAPITAL RESOURCES - INDIVIDUALS**  
No records found

**CAPITAL RESOURCES - ENTITIES**  
Entity Contributing Capital 1

**Entity Legal Name:** In Good Health, Inc.                      **Entity DBA:**  
**Email:** DNoble@ingoodhealthma.com   **Phone:** 617-869-1855  
**Address 1:** 1200 West Chestnut Street                      **Address 2:**  
**City:** Brockton                      **State:** MA                      **Zip Code:** 02301  
**Types of Capital:** Monetary/Equity   **Other Type of Capital:** Total Value of Capital Provided: \$100000   **Percentage of Initial Capital:** 2  
**Capital Attestation:** Yes

Entity Contributing Capital 2

**Entity Legal Name:** CLS Holdings USA, Inc.                      **Entity DBA:**  
**Email:** jeff@clsholdingsinc.com   **Phone:** 888-438-9132  
**Address 1:** 11767 S. Dixie Highway, Suite 115                      **Address 2:**  
**City:** Miami                      **State:** FL                      **Zip Code:** 33156  
**Types of Capital:** Debt                      **Other Type of Capital:** Total Value of Capital Provided: \$5000000   **Percentage of Initial Capital:** 98  
**Capital Attestation:** Yes

**BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES**  
No records found

**DISCLOSURE OF INDIVIDUAL INTERESTS**  
Individual 1

**First Name:** David                      **Last Name:** Noble                      **Suffix:**  
**Marijuana Establishment Name:** CannAssist LLC                      **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Leicester                      **Marijuana Establishment State:** MA

Individual 2

**First Name:** Barry                      **Last Name:** Kirshner                      **Suffix:**  
**Marijuana Establishment Name:** CannAssist LLC                      **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Leicester                      **Marijuana Establishment State:** MA

Individual 3

**First Name:** Rodereck                      **Last Name:** Tayag                      **Suffix:**  
**Marijuana Establishment Name:** CannAssist LLC                      **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Leicester                      **Marijuana Establishment State:** MA

#### Individual 4

**First Name:** Jordan                      **Last Name:** Mello                      **Suffix:**  
**Marijuana Establishment Name:** CannAssist LLC      **Business Type:** Marijuana Cultivator  
**Marijuana Establishment City:** Leicester                      **Marijuana Establishment State:** MA

#### MARIJUANA ESTABLISHMENT PROPERTY DETAILS

**Establishment Address 1:** 1200 West Chestnut Street  
**Establishment Address 2:**  
**Establishment City:** Brockton                      **Establishment Zip Code:** 02301  
**Approximate square footage of the establishment:** 55000                      **How many abutters does this property have?:** 9  
**Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?:** Yes

#### HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	IGH - HCS Cert Form.pdf	pdf	5c7efa8b2724e81b5255c96a	03/05/2019
Community Outreach Meeting Documentation	IGH - Community Mtg Attestation Form.pdf	pdf	5c7efa9d8d16491b5c0f9582	03/05/2019
Plan to Remain Compliant with Local Zoning	IGH - Local Compliance Plan.pdf	pdf	5c7efaafc4b7a71b66d13ee2	03/05/2019

Total amount of financial benefits accruing to the municipality as a result of the host community agreement. If the total amount is zero, please enter zero and provide documentation explaining this number.: \$393069.47

#### PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	IGH - Positive Impact Plan (revised 3-18-19).pdf	pdf	5c91598a5d4b0b1b3ebc35e2	03/19/2019
Plan for Positive Impact	IGH - Ltr of Support from FCR.pdf	pdf	5cacda1e3183181258e20ec3	04/09/2019

#### ADDITIONAL INFORMATION NOTIFICATION

**Notification:** I understand

#### INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

**Role:**                      **Other Role:**  
**First Name:** David                      **Last Name:** Noble      **Suffix:**  
**RMD Association:** RMD Manager  
**Background Question:** yes

Individual Background Information 2

**Role:**                      **Other Role:**  
**First Name:** Andrea                      **Last Name:** Noble      **Suffix:**

RMD Association: RMD Owner

Background Question: yes

Individual Background Information 3

Role: Other Role:

First Name: Barry Last Name: Kirshner Suffix:

RMD Association: RMD Manager

Background Question: no

Individual Background Information 4

Role: Other Role:

First Name: Rodereck Last Name: Tayag Suffix:

RMD Association: RMD Manager

Background Question: no

Individual Background Information 5

Role: Other Role:

First Name: Long Last Name: Nguyen Suffix:

RMD Association: RMD Staff

Background Question: no

Individual Background Information 6

Role: Other Role:

First Name: Jordan Last Name: Mello Suffix:

RMD Association: RMD Staff

Background Question: no

Individual Background Information 7

Role: Other Role:

First Name: Gerald Last Name: Freid Suffix:

RMD Association: RMD Owner

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Investor/Contributor Other Role:

Entity Legal Name: CLS Holdings USA, Inc. Entity DBA:

Entity Description: diversified cannabis company

Phone: 888-438-9132 Email: jeff@clsholdingsinc.com

Primary Business Address 1: 11767 S. Dixie Highway, Suite 115 Primary Business Address 2:

Primary Business City: Miami Primary Business State: FL Principal Business Zip Code: 33156

Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
-------------------	---------------	------	----	-------------

Department of Revenue - Certificate of Good standing	IGH-MA DOR Cert. of Good Standing.pdf	pdf	5c7f0541635d511b3475109b	03/05/2019
Secretary of Commonwealth - Certificate of Good Standing	IGH Cert of Good Standing (as 156D).pdf	pdf	5c7f055f9ff0081b4821b939	03/05/2019
Bylaws	IGH Amended Restated Bylaws (as 156D).pdf	pdf	5c7f05762724e81b5255c97c	03/05/2019
Articles of Organization	IGH Articles of Entity Conversion (filed).aspx.pdf	pdf	5c7f058c8d16491b5c0f9593	03/05/2019

Certificates of Good Standing:

Document Category	Document Name	Type	ID	Upload Date
Department of Revenue - Certificate of Good standing	IGH Cert. of Good Standing (DOR) (3-9-2021).pdf	pdf	604a6e41c997b43574a1c22b	03/11/2021
Department of Unemployment Assistance - Certificate of Good standing	IGH Cert. of Good Standing (DUA) (3-5-2021).pdf	pdf	604a6e4a79e02335ddb61db5	03/11/2021
Secretary of Commonwealth - Certificate of Good Standing	IGH Cert. of Good Standing (SOS) (3-9-2021).pdf	pdf	604a6e538d09dc35cbc0dfaa	03/11/2021

Massachusetts Business Identification Number: 462680110

Doing-Business-As Name:

DBA Registration City:

**BUSINESS PLAN**

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	IGH - Summary of Business Plan.pdf	pdf	5c7f05b7635d511b347510a1	03/05/2019
Plan for Liability Insurance	IGH Insurance Cert..pdf	pdf	5c7f05e03d84de123a6127bd	03/05/2019
Business Plan	IGH - Business Hours and Contact.pdf	pdf	5c7f05fdd7a931124ee046df	03/05/2019

**OPERATING POLICIES AND PROCEDURES**

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	IGH Plan to Obtain Marijuana_2021 Update.pdf	pdf	60510aa901124c35d20a3c32	03/16/2021
Separating recreational from medical operations, if applicable	IGH Separating Recreational from Medical Operations Plan_2021 Update.pdf	pdf	60510af693441135c0c3493d	03/16/2021
Prevention of diversion	IGH Diversion Plan_2021 Update.pdf	pdf	60510c1840676f35abee37bd	03/16/2021
Transportation of marijuana	IGH Transportation Plan_2021 Update.pdf	pdf	60510c504e7ce735949d071c	03/16/2021
Inventory procedures	IGH Inventory Plan_2021 Update.pdf	pdf	60510c9f01124c35d20a3c6b	03/16/2021
Record Keeping procedures	IGH Record Retention Plan_2021 Update.pdf	pdf	60510d03e15067356d20d66d	03/16/2021
Maintaining of financial records	IGH Maintenance of Financial Records	pdf	60510d0ab64912358e315bba	03/16/2021

	Plan_2021 Update.pdf			
Qualifications and training	IGH Agent Training Plan_2021 Update.pdf	pdf	60510d53efe1e0359b95d923	03/16/2021
Personnel policies including background checks	IGH Personnel Policy_2021 Update.pdf	pdf	60510dad8d09dc35cbc0f03c	03/16/2021
Quality control and testing	IGH Quality Control and Testing Plan_2021 Update.pdf	pdf	60510db68d09dc35cbc0f040	03/16/2021
Diversity plan	IGH Diversity Plan_2021 Update.pdf	pdf	60510df140676f35abee37de	03/16/2021
Energy Compliance Plan	IGH Energy Compliance Plan_2021 Update.pdf	pdf	605133b793441135c0c349fc	03/16/2021
Restricting Access to age 21 and older	IGH Restricting Access to Age 21 or Older_2021 Update.pdf	pdf	6052428d75f93835952f1d78	03/17/2021
Storage of marijuana	IGH Storage Plan_2021 Update.pdf	pdf	605242c875f93835952f1d82	03/17/2021
Security plan	IGH Security Plan_2021 Update.pdf	pdf	605242f4b3603835a49f6493	03/17/2021
Dispensing procedures	IGH Dispensing Policy_2021 Update.pdf	pdf	6052430e183b5235aa44fd7e	03/17/2021

### MARIJUANA RETAILER SPECIFIC REQUIREMENTS

Adequate Patient Supply Documentation:

Document Category	Document Name	Type	ID	Upload Date
	IGH Policy to Ensure Adequate Medical Supply_2021 Update.pdf	pdf	60510e8db64912358e315bdc	03/16/2021

Reasonable Substitutions of Marijuana Types and Strains Documentation:

Document Category	Document Name	Type	ID	Upload Date
	IGH Reasonable Substitution Policy.pdf	pdf	60510eb9183b5235aa44fa60	03/16/2021

### ATTESTATIONS

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

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

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

Notification: I Understand

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

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

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

## ADDITIONAL INFORMATION NOTIFICATION

**Notification:** I Understand

### COMPLIANCE WITH POSITIVE IMPACT PLAN

#### Progress or Success Goal 1

**Description of Progress or Success:** Reducing Barriers to entry in the commercial cannabis industry.

Since IGH's last retail renewal application submitted in March 2020, IGH has placed employment advertisements in The Enterprise, both digitally and in print. IGH's display advertisement proofs are attached. IGH also advertised continually on its web page throughout the year. Additionally, all customers were given flyers, directing potential candidates to the application process. IGH will continue to place all future notices for employment opportunities in The Enterprise and track job applications received in response to such employment advertisements, and job offers extended as a result.

While IGH intended to participate in at least one adult-use cannabis industry job fair in its first full year of operation and give preference to qualified job applicants residing in Brockton, the COVID-19 pandemic rendered this goal nearly impossible. Massasoit Community College, with whom IGH has partnered in the past, suspended all job fairs until further notice. Once job fairs resume, IGH will participate and will track the number of applications submitted following the job fair and the number of offers extended as a result.

As of February 2021, 22.43% of employees were Brockton residents—an increase of 0.81% since IGH's last retail renewal application. Please see the IGH Brockton Citizen Employment Chart, attached, for more details. IGH intends to continue growing these numbers.

IGH has recently hired a Director of Community Relations who will assist to further reduce barriers to entry.

Please note that IGH has made minor revisions to its existing Positive Impact Plan to ensure compliance with the most recent medical- and adult-use regulations. Please see the updated Positive Impact Plan, uploaded under Progress or Success Goal 1.

#### Progress or Success Goal 2

**Description of Progress or Success:** Providing financial support to local endeavors and businesses in Brockton which have a positive impact on the residents of Brockton and the Brockton community as a whole

To achieve this goal, IGH has partnered with several local organizations, including United Way of Greater Plymouth County, the Old Colony Y, Family and Community Resources, Inc., and the Champion Plan, Inc., to provide monetary contributions. Please see the attached community donation letters from each organization describing their relationship with IGH and/or their acceptance of funds related to a marijuana establishment. IGH also provided funds to Restaurant ORO, Brockton Area Arc, Lady C&J Soul Food and Catering, Patricia Riddle, the Brockton Historical Society, and The Leukemia and Lymphoma Society. IGH partnered with Restaurant ORO to provide meals for frontline health care workers at South Shore Hospital. IGH also partnered with Lady C&J Soul Food and Catering to provide meals for frontline health care workers at Brockton Hospital. Please see the attached balance sheets detailing the donations.

In furtherance of this goal, IGH's recently hired Director of Community Relations will be responsible for maintaining relationships with local organizations and continuing IGH's ongoing financial support of the Brockton community.

Please note that IGH has made minor revisions to its existing Positive Impact Plan to ensure compliance with the most recent medical- and adult-use regulations. Please see the updated Positive Impact Plan, uploaded under Progress or Success Goal 1.

### COMPLIANCE WITH DIVERSITY PLAN

#### Diversity Progress or Success 1

**Description of Progress or Success:** Increasing the number of individuals falling into the Commission-designated demographics working at IGH's colocated MTC and Marijuana Establishment and providing tools to ensure their success.

Since IGH's last retail renewal application submitted in March 2020, IGH has placed employment advertisements in The Enterprise, both digitally and in print. IGH's display advertisement proofs are attached. IGH also advertised continually on its web page throughout the year. Additionally, all customers were given flyers, directing potential candidates to the application process. IGH will continue to place all future notices for employment opportunities in The Enterprise and track job applications received in response to such employment advertisements, and job offers

extended as a result.

IGH intended to participate in at least one job fair targeting potential employees in the Commission-designated demographic groups. However, due to the COVID-19 pandemic, job fairs were suspended in 2020. Once resumed, IGH will participate in at least one job fair per year and record the number of attendees, number of applications submitted from attendees, and number of offers extended based on those applications. IGH will maintain records tracking the percentage of individuals applying and receiving employment offers who fall within a designated demographic group.

As of February 2021, 47.71% of IGH's total employees belong to a Commission-designated demographic group. Please see the IGH Diversity Employment Chart, attached. IGH will continue its efforts of increasing this number with future hiring decisions.

IGH recently hired a Director of Human Resources who will be responsible for furthering the goals of IGH's Diversity Plan, including hiring and advertising.

Please note that IGH has made minor revisions to its existing Diversity Plan to ensure compliance with the most recent medical- and adult-use regulations. Please see the updated Diversity Plan uploaded to the Operating Policies and Procedures section of the application.

#### Diversity Progress or Success 2

**Description of Progress or Success:** Increasing the number of individuals falling into the Commission-designated demographics in management or other key staff roles at IGH's colocated MTC and Marijuana Establishment and providing tools to ensure their success.

Since IGH's last retail renewal application submitted in March 2020, 53.33% of promoted individuals belonged to a Commission-designated demographic group. A total of fifteen employees have been promoted. Eight of those employees belong to a Commission-designated demographic group. Please see the IGH 2021 Promotions Chart, attached. IGH will continue its efforts of increasing this percentage and providing tools for success to individuals in management and other key staff roles.

IGH's recently hired Director of Human Resources will also be responsible for managing promotions and furthering this Diversity Plan goal.

Please note that IGH has made minor revisions to its existing Diversity Plan to ensure compliance with the most recent medical- and adult-use regulations. Please see the updated Diversity Plan uploaded to the Operating Policies and Procedures section of the application.

#### HOURS OF OPERATION

<b>Monday From:</b> 8:00 AM	<b>Monday To:</b> 8:00 PM
<b>Tuesday From:</b> 8:00 AM	<b>Tuesday To:</b> 8:00 PM
<b>Wednesday From:</b> 8:00 AM	<b>Wednesday To:</b> 8:00 PM
<b>Thursday From:</b> 8:00 AM	<b>Thursday To:</b> 8:00 PM
<b>Friday From:</b> 8:00 AM	<b>Friday To:</b> 8:00 PM
<b>Saturday From:</b> 8:00 AM	<b>Saturday To:</b> 8:00 PM
<b>Sunday From:</b> 8:00 AM	<b>Sunday To:</b> 8:00 PM

## 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

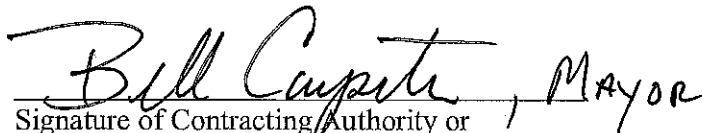
I, David Noble, Pres., (*insert name*) certify as an authorized representative of In Good Health, Inc. (*insert name of applicant*) that the applicant has executed a host community agreement with the City of Brockton (*insert name of host community*) pursuant to G.L.c. 94G § 3(d) on June 18, 2018 (*insert date*).



Signature of Authorized Representative of Applicant  
David Noble, President

### Host Community

I, Bill Carpenter, Mayor, (*insert name*) certify that I am the contracting authority or have been duly authorized by the contracting authority for the City of Brockton (*insert name of host community*) to certify that the applicant and the City of Brockton (*insert name of host community*) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on June 18, 2018 (*insert date*).



Signature of Contracting Authority or  
Authorized Representative of Host Community

Mayor Bill Carpenter

## Community Outreach Meeting Attestation Form

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

I, David Noble, (*insert name*) attest as an authorized representative of In Good Health, Inc. (*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 April 23, 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 April 11, 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 April 9, 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 April 9, 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.

**Attachment/Exhibit**

**A**

13675515  
4/11, 18, 2018

Community Outreach

**NOTICE OF  
COMMUNITY OUTREACH MEETING  
IN GOOD HEALTH, INC.**

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, April 23, 2018 at 4:00pm at Tutto Bene, 1050 Pearl Street, Brockton, Massachusetts 02301.

In Good Health, Inc. intends to apply for a Marijuana Cultivator, a Marijuana Product Manufacturer, and a Marijuana Retailer license to operate an Adult-use Marijuana Establishment at 1200 West Chest Street, Brockton, Massachusetts 02301.

Information presented at the Community Outreach Meeting will include:

- 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 Adult-use 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.

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

CN13677924  
Brockton Enterprise 4/11/2018

Each General Bid and each Filed Sub-Bid shall be accompanied by Bid Security equal to five (5) percent of the total possible Bid amount, including all alternates in the form of a Bid Bond, Certified Treasurer's or Cashier's Check issued by a responsible U.S. bank or Trust Company, payable to the Town of Avon. Each Bidder shall attach the required Bid Bond or Check to their Bid Form.

The Bid Securities of all General Bidders, except those of the three lowest responsible and eligible General Bidders, will be returned within five (5) days, Saturdays, Sundays, and legal holidays excluded, after the opening of General Bids.

The Bid Securities of all Filed Sub-Bidders, except those of the Sub-Bidders named in the General Bids of the three lowest responsible and eligible General Bidders, and those of the three lowest responsible and eligible Sub-Bidders for each sub-trade, will be returned within five (5) days, Saturdays, Sundays, and legal holidays excluded, after the opening of General Bids.

The Awarding Authority reserves the right to waive any informalities and to reject any or all General Bids not deemed to be in the best interest of the Town. The Awarding Authority reserves the right to reject any Filed Sub-Bid if it determines that such Sub-Bid does not represent the Sub-Bid of a person competent to perform the Work as specified or that less than three (3) such bids were received. (C:149, Sec.44E)

The successful General Bidder will be required to furnish a Performance Bond in the amount of one hundred percent (100%) of the total bid, and a Labor and Materials Payment Bond in the amount of one hundred percent (100%) of the total bid.

Attention is directed to the fact that no less than the minimum wages as set forth in Document 00 32 00 PREVAILING WAGE RATES of the Contract Documents must be paid on this Project and that no sales tax shall be included in their bids. Bids shall be made on the basis of the Minimum Wage Rates as determined by the Commissioner of Labor and Industries, Pursuant to the Provisions of Chapter 149, Sections 26 to 27D inclusive of Massachusetts General Laws.

All bids shall remain in effect for sixty (60) days, Saturdays, Sundays and legal holidays excluded, after the opening of General Bids.

The Awarding Authority reserves the right to reject any or all general bids, if it be in the public interest to do so, and to reject any sub-bid on any sub-trade if it determines that such sub-bid does not represent the sub-bid of a person competent to perform the work as specified or that less than three such sub-bids were received and that the prices are not reasonable for acceptance without further competition.

Town of Avon  
Awarding Authority  
65 Main Street  
Avon, MA 02322

13677332 4/11/18

WINNING  
S/BUCK-  
FER  
ACHU-  
2-1496  
1-0414  
1-0209

ly given  
lanning  
a Public  
ursday,  
at 7:15  
g the  
rescent  
ap A4,  
ic Way.  
be held  
inning  
e Avon  
ckley  
Main

neau,  
NING

es  
e  
0

by the purchaser at the time

TERMS OF SALE

Go to www.Projectlog.com and login with an existing

**Attachment/Exhibit**

**B**

Municipality  
not in

## NOTICE OF COMMUNITY OUTREACH MEETING

### IN GOOD HEALTH, INC.

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for **Monday, April 23, 2018 at 4:00pm at Tutto Bene, 1050 Pearl Street, Brockton, Massachusetts 02301.**

In Good Health, Inc. intends to apply for a Marijuana Cultivator, a Marijuana Product Manufacturer, and a Marijuana Retailer license to operate an Adult-use Marijuana Establishment at 1200 West Chest Street, Brockton, Massachusetts 02301.

Information presented at the Community Outreach Meeting will include:

- 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 Adult-use 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.

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

In Good Health, Inc.

David Noble  
President & CEO

**Attachment/Exhibit**

**C**

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for Monday, April 23, 2018 at 4:00pm at Tutto Bene, 1050 Pearl Street, Brockton, Massachusetts 02301.

In Good Health, Inc. intends to apply for a Marijuana Cultivator, a Marijuana Product Manufacturer, and a Marijuana Retailer license to operate an Adult-use Marijuana Establishment at 1200 West Chest Street, Brockton, Massachusetts 02301.

Information presented at the Community Outreach Meeting will include:

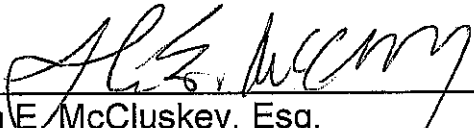
- a. The type(s) of Marijuana Establishment to be located at the proposed address;
- b. Information adequate to demonstrate that the location will be maintained securely;
- c. Steps to be taken by the Adult-use Marijuana Establishment to prevent diversion to minors;
- d. A plan by the Marijuana Establishment to positively impact the community; and
- e. Information adequate to demonstrate that the location will not constitute a nuisance.

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

## AFFIDAVIT OF NOTICE

I, John E. McCluskey, Esq. as counsel for In Good Health, Inc., which is located at 1200 West Chestnut Street, Brockton, MA (the Locus) hereby certify that on April 9, 2018 I did mail, postage prepaid, the attached notification to abutters within 300 feet of Locus and also hand delivered a separate notice as attached to the offices of the Brockton Planner, Brockton License Commission, Brockton City Clerk and the Brockton Solicitors Office.

Signed under the pains and penalties of perjury on April 24, 2018.

  
\_\_\_\_\_  
John E. McCluskey, Esq.

**Plan to Remain Compliant with Local Zoning**

In Good Health's ("IGH") proposed co-located medical and adult use marijuana establishment will be sited at the current registered marijuana dispensary ("RMD") facility at 1200 West Chestnut Street in Brockton, MA. The West Chestnut Street property is located in a designated medical marijuana overlay zone established by the Brockton City Council. IGH obtained a special permit from Brockton's Zoning Appeals Board in 2014 to operate the RMD at this location. In addition, the Zoning Appeals Board granted a variance which modified plot lines to the premises so that IGH remained compliant with the buffer zone requirements set forth by the City of Brockton relative to RMD siting near residential zones, schools, conservation land, public parks and children-oriented activity establishments.

The City of Brockton Planning Board is currently in the process of amending local zoning ordinances to address siting and permitting requirements for adult use marijuana establishments. IGH, in coordination with local counsel in Brockton, is continuing to monitor these local zoning developments regarding adult use marijuana establishments and will ensure the co-located facility at West Chestnut Street continues to comply with all requirements established by the Planning Board and/or City Council.

March 5th, 2021

Via Email (mbridges@cobma.us)


Megan Bridges  
City Solicitor  
Brockton City Hall  
45 School Street  
Brocton, MA 02301

Dear Ms. Bridges:

Pursuant to the Massachusetts Cannabis Control Commission regulations, 935 CMR 500.103(4)(f), In Good Health, Inc. ("IGH") writes to formally request from the City of Brockton (the "City") records of any cost to the City reasonably related to the operation of IGH's Adult-Use licenses, including the City's anticipated and actual expenses resulting from the operation of IGH in the community. In accordance with M.G.L. c. 94G, § 3(d), we note that any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC, as defined in that statute, shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Thank you for your attention to this matter and please don't hesitate to contact me should you have any questions.

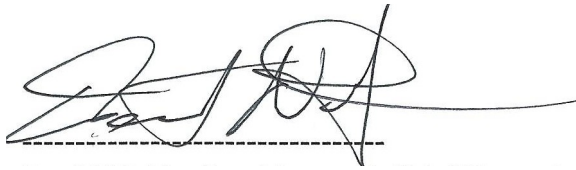
Sincerely,



David Noble, President and CEO

Attestation of No Response from the City of Brockton

I, David Noble, President and Chief Executive Officer, In Good Health, Inc. ("IGH"), attest that as of Thursday, March 11, 2021, no response was received from the City of Brockton (the "City") regarding the request of records of any cost the City incurred reasonably related to the operation of IGH's Adult-Use license, sent to Megan Bridges, City Solicitor, on Friday, March 5, 2021.

A handwritten signature in black ink, appearing to read 'David Noble', is written over a horizontal dashed line. The signature is stylized and cursive.

David Noble, President and Chief Executive Officer  
In Good Health, Inc.  
March 11, 2021

**Plan to Positively Impact Areas of Disproportionate Impact**

In Good Health’s (“IGH”) proposed co-located medical and adult use marijuana establishment will be sited at the current registered marijuana dispensary (“RMD”) facility at 1200 West Chestnut Street in Brockton, MA. The City of Brockton has been identified by the Commission in its sub-regulatory guidance as one of the Commonwealth’s 29 communities of disproportionate impact. Based on the location of IGH’s proposed co-located facility, and its established presence in the Brockton community, IGH will focus its positive impact efforts in the City of Brockton.

I. Goals

The goals for IGH’s positive impact efforts include:

1. Reducing barriers to entry in the commercial adult-use cannabis industry; and
2. Providing financial support to local endeavors and businesses in Brockton which will have a positive impact on the residents of Brockton and the Brockton community as a whole.

II. Programs

IGH will implement the following programs to meet the above-referenced goals of this plan:

- A. Develop partnerships with local organizations to ensure residents in Brockton are informed about and have access to employment opportunities in the adult-use cannabis industry, including the hosting of certain adult-use cannabis industry job fairs, either directly by IGH or in partnership with local organizations such as Massasoit Community College, and by giving a hiring preference to qualified job applicants who reside in Brockton.
  - i) IGH will post all advertisements for employment opportunities at its marijuana establishment in the local newspaper, *The Enterprise* to ensure such opportunities are widely disseminated in the Brockton community.
  - ii) IGH will also aim to host/co-host at least one job fair each year in Brockton. Representatives of IGH will have a table at each job fair and discuss current employment opportunities at the marijuana establishment with interested attendees.
- B. Provide annual monetary and in-kind donations to identified local non-profits and charities, including Family and Community Resources, Inc., which provides programs and services to individuals and families whose lives are impacted by trauma including violence at home, school or in their community.
  - i) Specific initiatives at Family and Community Resources, Inc. that IGH will continue to contribute to and/or participate in will include: (a) annual holiday toy drive, (b) annual ‘adopt-a-family’ holiday wish list, and (c) sponsorship of its annual fundraising dinner.

### III. Metrics

The following metrics will be tracked annually to assess IGH's progress with this plan and the achievement of the goals stated herein:

*Program A: Develop partnerships with local organizations to ensure residents in Brockton are informed about and have access to employment opportunities in the adult-use cannabis industry, including the hosting of certain adult-use cannabis industry job fairs, either directly by IGH or in partnership with local organizations such as Massasoit Community College, and by giving a hiring preference to qualified job applicants who reside in Brockton.*

Metrics: 1) number of employment advertisements placed in *The Enterprise*; 2) number of job applications received as a result of such advertisements, 3) number of job fairs hosted/co-hosted by IGH in the City of Brockton; 4) number of attendees at each job fair; 4) number of job applications submitted as a result of such job fair; and 5) number of qualified job applicants residing in Brockton and employed by IGH.

*Program B: Provide annual monetary and other in-kind donations to identified local non-profits and charities, including Family and Community Resources, Inc., which provides programs and services to individuals and families whose lives are impacted by trauma.*

Metrics: 1) amount of monetary contributions provided to Family and Community Resources, Inc.; and 2) descriptions of in-kind donations made to the identified local organizations (e.g., gifts donated through toy drives or through sponsor-a-local family holiday giving drives hosted by the local organization).

### IV. Annual Assessment and Acknowledgements

IGH will assess the performance of this plan annually and will report on its positive impact efforts and the identified metrics above to the Commission in accordance with its annual marijuana establishment licensure renewal in accordance with 935 CMR 500.103(4)(a).

IGH further acknowledges the following regarding the implementation of this plan:

- All specifically named organizations in this plan have been contacted and have agreed to receive the contemplated monetary and/or in-kind donations discussed herein or have agreed to partner with IGH to implement the identified goals and programs stated herein, as applicable.
- In carrying out this plan, IGH will adhere to the requirements concerning prohibited advertising, branding, marketing, and sponsorship practices of every marijuana establishment in accordance with 935 CMR 500.105(4).
- Any actions taken, or programs instituted by IGH in connection with this plan will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.



To Whom It May Concern:

For over fifty years, **Family and Community Resources, Inc.** (FCR) has provided a continuum of services for child, adolescent, and adult victims of trauma who reside in the City of Brockton and 55 other communities from Quincy to the Cape and Islands, including a state licensed behavioral health clinic, advocacy, crisis intervention and case management. FCR offers a variety of free, community-based services, with a special focus on services for survivors of domestic and sexual violence. More recently, FCR has increased its services to Veterans and victims of sex trafficking. FCR also chairs the Greater Brockton Task Force on Sexual and Domestic Violence.

**In Good Health** has supported FCR since their opening in September, 2015. In Good Health sponsored our annual Cinco de Mayo Celebration of Women for the past 3 years, and were Platinum Level sponsors in 2017 and 2018. They have hosted a Holiday Drive on our behalf for the past 2 years, collecting hundreds of items for the families we serve who are in need of clothing, hygiene products and toys. This past holiday season In Good Health became supporters of our annual Adopt-A-Family program, providing all of the items on a holiday wish-list for a family of five from Brockton. Recently In Good Health has agreed to sponsor a “used cell phone drive” for FCR, from which the proceeds will be used to support the FCR safe home emergency shelter program.

Although other organizations may be weary of receiving support from the cannabis community, FCR recognized from the beginning all of the good they provide not only for the medical marijuana patients of Massachusetts, but also for our organization and the Brockton Community as a whole. We hope to continue working with them for years to come to better the lives of the individuals and families we serve.

Sincerely,

Patricia Kelleher  
President/CEO



Commonwealth of Massachusetts  
Department of Revenue  
Christopher C. Harding, Commissioner  
mass.gov/dor

Letter ID: L1116741760  
Notice Date: April 2, 2018  
Case ID: 0-000-453-110



## CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



IN GOOD HEALTH INC  
1200 W CHESTNUT ST  
BROCKTON MA 02301-5574

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

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

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

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

### *What if I have questions?*

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

### *Visit us online!*

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

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

Edward W. Coyle, Jr., Chief  
Collections Bureau



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

William Francis Galvin  
Secretary of the  
Commonwealth

November 28, 2018

TO WHOM IT MAY CONCERN:

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

**IN GOOD HEALTH, INC**

is a domestic corporation organized on **November 6, 2018**, under the General Laws of the Commonwealth of Massachusetts.

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



In testimony of which,  
I have hereunto affixed the  
Great Seal of the Commonwealth  
on the date first above written.

*William Francis Galvin*

Secretary of the Commonwealth

**AMENDED AND RESTATED**

**BYLAWS**

**OF**

**IN GOOD HEALTH, INC.**

ADOPTED: November 6, 2018

Secretary: Andrea Noble

ARTICLE I NAME, OFFICES AND SEAL .....	1
Section 1. NAME.....	1
Section 2. PRINCIPAL OFFICE. ....	1
Section 3. OTHER OFFICES. ....	1
Section 4. SEAL. ....	1
ARTICLE II STOCKHOLDERS .....	1
Section 1. ANNUAL MEETING.....	2
Section 2. SPECIAL MEETING. ....	2
Section 3. PLACE AND TIME: REMOTE PARTICIPATION.....	2
Section 4. NOTICE OF MEETING.....	2
Section 5. QUORUM.....	3
Section 6. VOTING: PROXIES: .....	3
Section 7. ACTION WITHOUT A MEETING: ELECTRONIC TRANSMISSION.....	4
ARTICLE III STOCK CERTIFICATES .....	5
Section 1. FORM OF CERTIFICATE.....	5
Section 2. ISSUE OF CERTIFICATES.....	5
Section 3. TRANSFERS.....	6
Section 4. PRE-EMPTIVE RIGHTS.....	8
ARTICLE IV DIRECTORS .....	9
Section 1. NUMBER, TERM AND QUALIFICATION.....	9
Section 2. POWERS. ....	9
Section 3. MEETINGS. ....	10
Section 4. QUORUM.....	10
Section 5. REMOVAL.....	11
Section 6. ACTION WITHOUT A MEETING.....	11
Section 7. REMOTE PARTICIPATION	
Section 8. ACTION AT A MEETING. ....	11
Section 9. COMMITTEES.....	12
ARTICLE V OFFICERS .....	12
Section 1. NUMBER AND ELECTION.....	12
Section 2. TERM AND REMOVAL.....	13
Section 3. POWERS AND DUTIES. ....	13
ARTICLE VI INDEMNIFICATION OF DIRECTORS, OFFICERS, EMPLOYEES AND OTHER AGENTS .....	13
Section 1. DIRECTORS AND OFFICERS.....	14
Section 2. EMPLOYEES AND OTHER AGENTS.....	15
Section 3. LIMIT UPON INDEMNIFICATION.....	15
Section 4. OTHER REMEDIES.....	15
ARTICLE VII AMENDMENTS .....	17
ARTICLE VIII MISCELLANEOUS PROVISIONS .....	17

Section 1. FISCAL YEAR.....	17
Section 2. SECURITIES OF OTHER CORPORATIONS.....	17
Section 3. REFERENCES. ....	17

**BYLAWS**  
**OF**  
**IN GOOD HEALTH, INC.**

**ARTICLE I**  
**NAME, OFFICES AND SEAL**

Section 1. NAME. The name of the corporation shall be In Good Health, Inc. (“Corporation”).

Section 2. PRINCIPAL OFFICE. The principal office of the Corporation in the Commonwealth of Massachusetts shall be located at 1200 West Chestnut Street, Brockton, MA 02301. The Directors may at any time and from time to time change the location of the principal office of the Corporation in the Commonwealth.

Section 3. OTHER OFFICES. The Corporation may also have an office or offices at such other location or locations, within or without the Commonwealth of Massachusetts, as the Directors may from time to time designate.

Section 4. SEAL. The seal of the Corporation shall bear its name, the year of its incorporation, and the word "Massachusetts", and shall otherwise be in such form as the Directors may from time to time determine.

**ARTICLE II**  
**STOCKHOLDERS**

Section 1. ANNUAL MEETING. The annual meeting of stockholders shall be held at such hour as the Directors may determine on the third Tuesday in March of each year. If that day

is a legal holiday in the place where the annual meeting is to be held, then it shall be held on the next succeeding day not a legal holiday, unless a different hour is fixed by the Board of Directors or President and stated in the notice of the meeting. The purposes of the annual meeting shall be those from time to time required by law, the Articles of Organization, or these Bylaws and may also include such further purposes as the Directors or the President may determine. If for any reason the annual meeting shall not be held on the date fixed herein, a special meeting in lieu of the annual meeting may be held with all the force and effect of an annual meeting.

Section 2. SPECIAL MEETING. Special meetings of stockholders may be called by the President or a majority of the Board of Directors. Upon written application of one or more stockholders who hold at least ten percent of the capital stock entitled to vote at the meeting, special meetings shall be called by the Secretary or in case of his death, absence, incapacity or refusal to call, by any other officer. The call for the meeting shall state the date, hour and place, and the purposes of the meeting.

Section 3. PLACE AND TIME; REMOTE PARTICIPATION. All meetings of stockholders shall be held at the principal office of the Corporation in the Commonwealth of Massachusetts or at such other place within the Commonwealth or elsewhere in the United States as is fixed by the Directors or President and stated in the notice of the meeting. Unless otherwise stated in the notice of the meeting, all meetings of stockholders shall be held at 5:30 p.m. If authorized by the Directors, stockholder meetings may be held solely by remote communication. Stockholders attending the meeting via remote communication may participate in the meeting, be deemed present in person, and vote by means of remote device, subject to the guidelines the Board of Directors has adopted for such meeting. These guidelines require (a) reasonable measures to

verify each person deemed present and voting is a stockholder and (b) provide stockholders reasonable opportunity to participate in the meeting and vote on matters submitted to the stockholders, including the opportunity to read or hear the meeting's proceedings concurrently with the proceedings. All action or voting taken by a stockholder at the meeting via remote communication shall be recorded.

Section 4. NOTICE OF MEETING. Except as otherwise permitted by law, written notice of the place, date and hour of all meetings of stockholders stating the purposes of the meeting shall be given by the Secretary or Assistant Secretary or other authorized person to each stockholder entitled to vote thereat by leaving such notice with him or at his residence or usual place of business, or by posting it, postage prepaid addressed to him at his address as it appears in the records of the Corporation, in either case at least seven (7) and no more than 60 days before the meeting. No notice of any meeting or of the purposes thereof need be given to a stockholder if a written waiver of notice, executed before or after the meeting by such stockholder or his attorney, is filed with records of the meeting.

Section 5. QUORUM. A majority interest of all stock issued, outstanding and entitled to vote at the particular meeting shall constitute a quorum. If there is less than a quorum at a meeting, a majority of the shares represented may vote to adjourn indefinitely, or may vote to adjourn from time to time and without giving further notice of the adjournment than the announcement at the meeting at which the vote for adjournment is taken. Any business may be transacted at such adjourned meeting which might have been transacted at the meeting originally called. A share once represented is deemed present unless the stockholder attends solely to object to lack of notice or, in the case of an adjournment, a new record date is set for that adjourned

meeting. If a quorum exists, favorable action on a matter, other than the election of Directors, is taken if the votes favoring action exceed the votes opposing action. Additionally, if a quorum exists, Directors shall be elected by a plurality. Abstentions are ordinarily not counted as negative votes.

Section 6. VOTING: PROXIES: Each stockholder who is entitled to vote shall have one vote for each share of stock, and a proportionate vote for a fractional share, standing in his name according to the stock records of the Corporation. Stockholders may vote in person or by proxy, but no proxy dated more than eleven (11) months before the meeting named therein shall be valid. Proxies shall be filed with the Secretary of the meeting before being voted and, unless otherwise noted thereon, shall entitle the person named to vote at any adjournment of such meeting but shall not be valid after final adjournment of the meeting. Proxies with respect to stock held in the name of two or more persons shall be valid if executed by any one of them, unless at or prior to exercise of the proxy, the Secretary receives a specific written notice to the contrary from any one of them. A proxy purporting to be executed by or on behalf of a stockholder shall be deemed valid unless challenged at or prior to its exercise. The burden of proving the invalidity of any particular proxy shall rest upon the person challenging the validity. The vote of a majority of the shares represented and entitled to vote at a particular meeting shall be required for action at such meeting, unless otherwise required by law, the Articles of Organization or these Bylaws.

Section 7. ACTION WITHOUT A MEETING; ELECTRONIC TRANSMISSION. Any action required or permitted to be taken at any meeting of the stockholders may be taken without a meeting if all stockholders entitled to vote on the matter consent to the action in writing and the written consents are filed with the records of the meetings of stockholders. Such consents shall be

treated for all purposes as a vote at a meeting. Any action by a stockholder shall be considered if given in writing, dated, and signed if it consists of an electronic transmission that sets forth or is delivered with information that can determine (1) that the electronic transmission was sent by the stockholder or proxy and (2) the date on which the stockholder or proxy transmitted the electronic transmission, which shall be considered the date it was signed. The electronic transmission is considered received if sent to an address specified by the Corporation for that purpose or to the principal office of the Corporation addressed to the Secretary if no address has been specified.

### **ARTICLE III**

#### **STOCK CERTIFICATES**

Section 1. FORM OF CERTIFICATE. Certificates for stock shall be in such form as may be from time to time determined by the Directors and shall contain such references, notations and other material in any particular instance as may be required by the statutes of the Commonwealth of Massachusetts including, without limitation, designation of the class of such stock.

Section 2. ISSUE OF CERTIFICATES. Each stockholder will receive a certificate for the number of shares of capital stock to which he is entitled, duly numbered and signed by the President or a Vice President and by the Treasurer or an Assistant Treasurer. If such certificate is countersigned by a transfer agent or registrar who is not a Director, officer or employee of the Corporation, the signatures of such officers may be facsimiles. If any officer who has signed or whose facsimile signature has been placed upon such certificate shall cease to be such officer before the certificate is issued, it may be issued by the Corporation with the same effect as if he were such officer at the time of its issue. If capital stock is authorized to be issued for cash,

whether or not to be paid in full before issue, the Directors may require payment in such proportions and at such times and places as they may determine and they may make demand for such payment by notice mailed to the particular subscriber or stockholder at any time before or after a subscription or any portion thereof; or any installment due upon stock already issued, is payable.

Section 3. TRANSFERS. Subject to any restrictions on transfer imposed upon any shares of stock by the Articles of Organization or by these Bylaws or by any agreement to which the Corporation is a party, shares of stock of the Corporation shall be transferable only on the books of the Corporation by surrender of the certificate therefore to the Corporation or its transfer agent duly endorsed or accompanied by a properly executed assignment and power of attorney with necessary transfer stamps affixed and with such proof as to authenticity of signature as may be required by the Corporation or its transfer agent.

3.1 In the event shares, the certificate for which notes a restriction on transfer established in the manner set out above, or in any other manner, are presented as aforesaid for transfer, the Corporation or its transfer agent may issue a new certificate or certificates in accordance with such transfer, but such new certificate or certificates shall bear the same notations as to restrictions on transfer as appear on the certificate presented for transfer unless the Corporation or its transfer agent receives such proof as is in its sole discretion satisfactory to it that such restrictions no longer apply.

3.2 In the event shares of stock are issued by the Corporation or are presented to it for transfer, the issuance or transfer of which might involve directly or indirectly the applicability of federal or state laws regulating the issuance and sale of securities, the

Corporation in the case of issuance and the Corporation or its transfer agent in the case of transfer may require that the certificate or certificates originally issued and those issued on transfer be endorsed with such language as in their sole discretion may be necessary in respect of the Corporation's duties and liabilities under such laws.

3.3 No course of action undertaken in good faith by the Corporation or its transfer agent under this Article III, nor any delay resulting therefrom, shall entitle a stockholder or his transferee or proposed transferee to reimbursement by the Corporation or its transfer agent or any Director or officer or agent thereof for any loss occasioned by such course of action or delay. Nothing contained in these Bylaws shall be construed to deprive the Corporation or its transfer agent of any rights which it may have to refuse to transfer any shares of stock.

3.4 Except as otherwise required by law, the Articles of Organization or these Bylaws, the Corporation shall be entitled to treat the record holder of stock as shown on its books as the owner of such stock for all purposes, regardless of any transfer, pledge or other disposition of such stock, until the shares have been transferred on the books of the Corporation pursuant to these Bylaws.

3.5 It shall be the duty of each stockholder to notify the Corporation of the post office address to which he wishes all communications by the Corporation to him as stockholder addressed and delivered.

3.6 The Directors may determine the conditions upon which a new certificate may be issued in place of any certificate of stock alleged to have been lost, mutilated or destroyed. They may, in their discretion, require the owner of a lost, mutilated or

destroyed certificate, or his legal representative, to give a bond, sufficient in their opinion, with or without surety, to indemnify the Corporation against any loss or claim which may arise by reason of the issue of such new certificate.

3.7 The Directors may, for a period not in excess of sixty (60) days before the date of any meeting of stockholders, or the date for the payment of any dividend, or the making of any distribution to stockholders, or the last day on which the consent or dissent of stockholders may be effectively expressed for any purpose, fix in advance a time as the record date for determining the stockholders having the right to notice of and to vote at such meeting and any adjournment thereof or the right to receive such dividend or distribution or the right to give such consent or dissent, and in such case only stockholders of record on such record date shall have such right, notwithstanding any transfer of stock on the books of the Corporation after the record date; or without fixing such record date the Directors may for any of such purposes close the transfer books for all or any part of such period. If no record date is fixed and the transfer books are not closed:

- (1) The record date for determining stockholders having the right to notice of or to vote at a meeting of stockholders shall be at the close of business on the day next proceeding the day on which notice is given.
- (2) The record date for determining stockholders for any other purpose shall be at the close of business on the day on which the Board of Directors acts with respect thereto.

Section 4. PRE-EMPTIVE RIGHTS. Other provisions of these Bylaws to the contrary notwithstanding the Corporation shall have no right to sell any of its capital stock to any

prospective buyer without first offering said stock to existing shareholders on a pro-rata basis. This provision is specifically intended to allow shareholders to maintain their proportionate interest in the corporation. This provision may be amended only by unanimous vote of each class of stock outstanding and entitled to vote thereon.

## **ARTICLE IV**

### **DIRECTORS**

Section 1. NUMBER, TERM, and QUALIFICATION. The Board of Directors shall consist of not more than five persons, except that when there is only one stockholder, there may be one or two Directors, and when there are two stockholders, there must be at least two Directors. Except as hereinafter provided, Directors shall be elected at the annual meeting of the stockholders, and each Director shall hold office until the next annual meeting of the stockholders and until his successor is chosen and qualified. Directors need not be stockholders. Any director may resign by delivering his written resignation to the Corporation at its principal office or to the President or Secretary. Such resignation shall be effective upon receipt unless it is specified to be effective at some other time or upon the happening of some other event. Vacancies in the Board of Directors shall be filled by a majority of the stockholders.

Section 2. POWERS. The Directors shall have the general management of and control over all the properties and affairs of the Corporation and shall have and may exercise all the powers of the Corporation except such as are expressly conferred upon or reserved to the stockholders by law or by the Articles of Organization or by these Bylaws.

Section 3. MEETINGS. Meetings of the Board of Directors shall be held at such place

within or outside the Commonwealth of Massachusetts as may from time to time be fixed by vote of the Board of Directors, and no notice need be given of regular meetings held at times and places so fixed. Other regular meetings shall be held at least quarterly at such times and places as may from time to time be fixed by vote of the Board of Directors and as set forth in a notice duly served on or sent or mailed or verbally communicated to each Director by the Secretary not less than two days before such meeting. Special meetings of the Board of Directors may be held at any time upon the call of the President, Treasurer, or any two Directors by oral, telegraphic or written notice duly served on or sent or mailed to each Director not less than two days before such meeting and shall be held at the place designated in the call thereof. Notice of a special meeting need not be given to any Director if a written waiver of notice, executed by him before or after the meeting, is filed with the records of the meeting, or to any Director who attends the meeting without protesting, prior thereto or at its commencement, the lack of notice to him. A notice or waiver of notice of a Director's meeting need not specify the purposes of the meeting. The vote of a majority of the Directors in attendance at a particular meeting shall be required for action at such meeting, unless otherwise required by law, the Articles of Organization or these Bylaws.

Section 4. QUORUM. A majority of the Board of Directors then in office shall constitute a quorum for the transaction of business. In addition to those Directors who are actually present at a meeting, Directors shall for the purposes of these Bylaws be deemed present at such meeting if a telephone or similar communication device by means of which all Directors participating in the meeting can hear each other at the same time is used. Less than a quorum may, however, vote to adjourn either finally or from time to time to another day and place in which latter case notice of the adjourned time and place shall be given as aforesaid to all Directors.

Section 5. REMOVAL. At any special meeting of the stockholders, duly called as provided in these Bylaws, any Director or Directors may, by the affirmative vote of the holders of a majority of all the shares of stock outstanding and entitled to vote for the election of Directors, be removed from such office, either with or without cause. A director may be removed from office for cause by a vote of a majority of the Directors then in office. Without limiting the generality of the preceding sentence, at any meeting of the Board of Directors, any Director or Directors then in office shall be removed for cause from his office as a Director upon the occurrence of any of the following events: (i) resignation; (ii) retirement; (iii) death; or (iv) conviction by any court of any misdemeanor or felony. The successor or successors of a Director or Directors so removed may be elected at the meeting of the stockholders or Directors, as the case may be, taking such action; or the remaining Directors, to the extent vacancies are not filled by the stockholders at any meeting at which they remove a Director, or fill any vacancy or vacancies created by such removal.

Section 6. ACTION WITHOUT A MEETING. Any action required or permitted to be taken at any meeting of the Directors may be taken without a meeting by unanimous consent by the Directors and filed with the records of the Directors' meetings. The action must be evidenced by one or more consents describing the action taken, in writing, signed by each Director, or delivered to the Corporation by electronic transmission, to the address specified by the Corporation for the purpose or, if no address has been specified, to the principal office of the Corporation, addressed to the Secretary or other officer having custody of the records of proceedings of Directors. Such consents shall be treated for all purposes as a vote at a meeting.

Section 7. REMOTE PARTICIPATION. Board of Directors members or any committees

may participate in the meeting or conduct a meeting through the use of any means of communication by which all participating may simultaneously hear one another during the meeting and participation by such means shall constitute presence in person.

Section 8. ACTION AT A MEETING. At any meeting of the Directors at which a quorum is present, a majority of the Directors present may take any action, except when a larger vote is required by law, by the Articles of Organization, or by these Bylaws, shall be sufficient to decide such matter.

Section 9. COMMITTEES. The Directors may, by vote of a majority of the Directors then in office, elect from their number an executive or other committees and may by vote delegate thereto some or all of their powers except those which by law, the Articles of Organization or these Bylaws they are prohibited from delegating. Except as the Directors may otherwise determine, any such committee may make rules for the conduct of its business, but unless otherwise provided by the Directors or in such rules, its business shall be conducted as nearly as may be in the same manner as is provided by these Bylaws for the Directors.

## **ARTICLE V**

### **OFFICERS**

Section 1. NUMBER AND ELECTION. The officers of the Corporation shall be a President, a Treasurer and a Secretary all of whom shall be elected by the Board of Directors at their first meeting following the annual meeting of the stockholders. The Board of Directors may also at any time and from time to time appoint one or more vice presidents and such assistant treasurers, assistant secretaries, and such other officers, agents and employees as it may deem

proper. The President may but need not be a Director. No officer need be a stockholder. The same person may hold more than one office. The President may, but need not, be chosen from among the Directors. The Secretary shall be a resident of the Commonwealth of Massachusetts unless the Corporation shall have appointed a resident agent under the laws of the Commonwealth of Massachusetts.

Section 2. TERM AND REMOVAL. All officers shall hold office until the first meeting of the Board of Directors following the next annual meeting of the stockholders and until their respective successors are chosen and qualified, but any officer may be removed from office, either with or without cause, at any time by vote of the Board of Directors then in office. Any officer may resign by delivering his written resignation to the corporation at its principal office or to the President or Secretary, and such resignation shall be effective upon receipt unless it is specified to be effective at some earlier time or upon the happening of some other event. A vacancy in any office arising from any cause may be filled for the unexpired portion of the term by the Board of Directors.

Section 3. POWERS AND DUTIES. Unless otherwise determined by the Board of Directors, the officers of the Corporation shall each have such powers and duties as generally pertain to their respective offices, as well as such additional powers and duties as from time to time may be conferred by the Board of Directors. Any vice president, assistant treasurer and assistant secretary shall, in the absence or disability of the President, Treasurer or Secretary, respectively, perform the duties of such officer and shall generally assist the President, Treasurer or Secretary, respectively.

**ARTICLE VI**  
**INDEMNIFICATION OF DIRECTORS, OFFICERS,**  
**EMPLOYEES AND OTHER AGENTS**

Section 1. DIRECTORS AND OFFICERS. The Corporation shall indemnify its officers and Directors to the maximum extent permitted under applicable law against all liabilities and expenses, including amounts paid in satisfaction of judgments, in compromise, or as fines and penalties, and counsel fees, reasonably incurred by an officer or Director in connection with the defense or disposition of any civil, criminal, administrative or investigative action, suit or other proceeding, whether civil or criminal, in which he may be involved or with which he may be threatened with respect to any action taken or not taken by such officer or Director of such action, had it been taken or not taken by an officer or Director of the Corporation in his capacity as such, would have been entitled to indemnification under Chapter 156D. Expenses (including attorneys' fees) incurred by an officer or Director in defending any such action, suit or other proceeding shall be paid by the Corporation in advance of the final disposition of such action, suit or proceeding upon receipt of the officer's, and/or director's written affirmation of his good faith belief that he has met the relevant standard of conduct described in Section 8.51 of Chapter 156D and his written undertaking to repay any funds advanced if it is ultimately determined that he is not entitled to indemnification. The right of indemnification provided herein shall not be exclusive of or affect any other rights to indemnification to which such officer or Director may be entitled.

Section 2. EMPLOYEES AND OTHER AGENTS. The Board of Directors may, by general vote or by vote pertaining to a specific employee or agent or class thereof, authorize indemnification of the Corporation's employees and agents, other than those officers, Directors

and persons referred to in Section 1 above, to whatever extent they may determine, which may be in the same manner and to the same extent provided in Section 1 above.

Section 3. LIMIT UPON INDEMNIFICATION. Indemnification under this Article VI, whether under Section 1 or Section 2, shall not be made, and no person shall be entitled to indemnification, in any case where such claim, action, suit or proceeding shall proceed to final adjudication and it shall be finally adjudged, nor shall any settlement be determined reasonable if it is found, that such Director, officer, person, employee or agent (a) is or was derelict in the performance of his duties in connection with the alleged acts or omissions giving rise to such claim, action, suit or proceeding, or (b) has not acted in good faith in the reasonable belief that his action was in the best interests of the Corporation. Neither a judgment of conviction nor the entry of any plea in a criminal case shall of itself be deemed an adjudication that such Director, officer, employee or agent was derelict in the performance of his duties if he acted in good faith, for a purpose which he reasonably believed to be in the best interests of the Corporation, and had no reasonable cause to believe that his conduct was unlawful.

Section 4. OTHER REMEDIES. The rights of indemnification herein provided for shall be severable, shall not be exclusive of other rights to which any Director, officer, employee or agent may now or hereafter be entitled, shall continue as to a person who has ceased to be such Director, officer, employee or agent, and shall inure to the benefit of the heirs, executors and administrators of such a person.

## **ARTICLE VII**

### **AMENDMENTS**

These Bylaws may be altered, amended or repealed, and new Bylaws not inconsistent with any provision of the Articles of Organization or statute may be made by the affirmative vote of a supermajority of the stockholders of the Corporation entitled to vote thereon at any regular or special meeting of the stockholders duly called after notice to the stockholders of that purpose.

## **ARTICLE VIII**

### **MISCELLANEOUS PROVISIONS**

Section 1. FISCAL YEAR. Except as from time to time otherwise determined by the Directors the fiscal year of the corporation shall be the twelve months, ending the last day of December in each year.

Section 2. SECURITIES OF OTHER CORPORATIONS. The President or Treasurer, and such other officer or officers as the Directors may designate, may exercise on behalf of this Corporation all rights possessed by it in respect of the securities or similar interests issued by any other corporation or organization held by this Corporation, and in connection therewith may waive notice of, file consents to actions taken, and appoint any person or persons to act as proxy or attorney in fact for this Corporation (with or without power of substitution) at any meeting of shareholders of such other corporation or organization.

Section 3. REFERENCES. All references in these Bylaws to the Articles of Organization and to these Bylaws shall mean the Articles of Organization and Bylaws as originally filed and adopted and as from time to time amended.

D

# The Commonwealth of Massachusetts

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

In Good Health, Inc. is a Medical Marijuana Treatment Center with the Department of Public Health in accordance with 105 CMR 725.004 as of December 18, 2017.  
Bryan Harter 12/18/17  
Director  
Medical Use of Marijuana Program  
Bureau of Healthcare Safety and Quality  
Massachusetts Department of Public Health

FORM MUST BE TYPED

## Articles of Entity Conversion of a Domestic Non-Profit with a Pending Provisional or Final Certification to Dispense Medical Use Marijuana to a Domestic Business Corporation (General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

FORM 950A

4 62690110

- (1) Exact name of the non-profit: In Good Health, Inc.
- (2) A corporate name that satisfies the requirements of G.L. Chapter 156D, Section 4.01:  
In Good Health, Inc.
- (3) The plan of entity conversion was duly approved in accordance with the law.
- (4) The following information is required to be included in the articles of organization pursuant to G.L. Chapter 156D, Section 2.02(a) or permitted to be included in the articles pursuant to G.L. Chapter 156D, Section 2.02(b):

### ARTICLE I

The exact name of the corporation upon conversion is:

In Good Health, Inc.

### ARTICLE II

Unless the articles of organization otherwise provide, all corporations formed pursuant to G.L. Chapter 156D have the purpose of engaging in any lawful business. Please specify if you want a more limited purpose:\*

The purpose of the Corporation shall be to engage in any activity in which a corporation organized under Chapter 156D of the laws of the Commonwealth of Massachusetts may lawfully engage, including operation as a registered marijuana dispensary and licensed marijuana establishment.

(<sup>^</sup> medical) (<sup>^</sup> medical)

4  
PC.

**ARTICLE III**

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

WITHOUT PAR VALUE		WITH PAR VALUE		
TYPE	NUMBER OF SHARES	TYPE	NUMBER OF SHARES	PAR VALUE
	1,000			

**ARTICLE IV**

Prior to the issuance of shares of any class or series, the articles of organization must set forth the preferences, limitations and relative rights of that class or series. The articles may also limit the type or specify the minimum amount of consideration for which shares of any class or series may be issued. Please set forth the preferences, limitations and relative rights of each class or series and, if desired, the required type and minimum amount of consideration to be received.

**ARTICLE V**

The restrictions, if any, imposed by the articles or organization upon the transfer of shares of any class or series of stock are:

*See further*

~~Please see~~ corporation's Stock Agreement

**ARTICLE VI**

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

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

**ARTICLE VII**

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

**ARTICLE VIII**

The information contained in this article is not a permanent part of the articles of organization.

- a. The street address of the initial registered office of the corporation in the commonwealth:  
1200 West Chestnut Street, Brockton, MA 02301
- b. The name of its initial registered agent at its registered office:  
David Noble, 1200 West Chestnut Street, Brockton, MA 02301
- c. The names and addresses of the individuals who will serve as the initial directors, president, treasurer and secretary of the corporation (an address need not be specified if the business address of the officer or director is the same as the principal office location):

President: David Noble

Treasurer: Andrea Noble

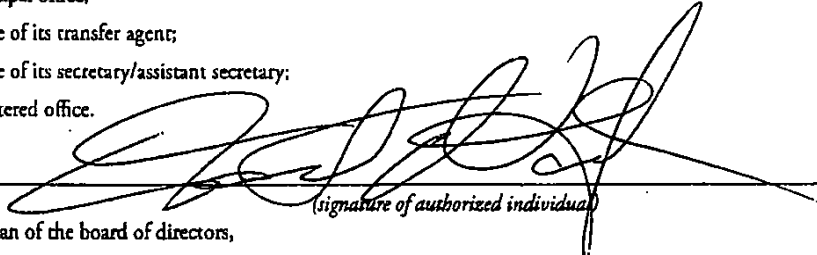
Secretary: Andrea Noble

Director(s): David Noble; Andrea Noble

- d. The fiscal year end of the corporation:  
12/31
- e. A brief description of the type of business in which the corporation intends to engage:  
Operation as a registered <sup>medical</sup> marijuana dispensary and licensed <sup>medical</sup> marijuana establishment
- f. The street address of the principal office of the corporation:  
1200 West Chestnut Street, Brockton, MA 02301
- g. The street address where the records of the corporation required to be kept in the commonwealth are located is:

1200 West Chestnut Street, Brockton, MA 02301, which is  
*(number, street, city or town, state, zip code)*

- its principal office;
- an office of its transfer agent;
- an office of its secretary/assistant secretary;
- its registered office.

Signed by:  \_\_\_\_\_  
*(signature of authorized individual)*

- Chairman of the board of directors,
- President,
- Other officer,
- Court-appointed fiduciary,

on this 6th day of NOVEMBER, ~~2007~~ 2018

COMMONWEALTH OF MASSACHUSETTS

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

Articles of Entity Conversion of a  
Domestic Non-Profit with a Pending Provisional or  
Final Certification to Dispense Medical Use Marijuana  
to a Domestic Business Corporation  
(General Laws Chapter 156D, Section 9.53; 950 CMR 113.30)

I hereby certify that upon examination of these articles of conversion, duly submitted to me, it appears that the provisions of the General Laws relative thereto have been complied with, and I hereby approve said articles; and the filing fee in the amount of \$ 475 having been paid, said articles are deemed to have been filed with me this 6 day of November, 20 18, at \_\_\_\_\_ a.m./p.m.  
*time*

Effective date: \_\_\_\_\_  
(must be within 90 days of date submitted)

*William Francis Galvin*  
WILLIAM FRANCIS GALVIN  
Secretary of the Commonwealth

check 39269  
cash 501473

CS 19987  
2018 NOV -6 PM 4:00  
CORPORATIONS DIVISION  
SECRETARY OF THE COMMONWEALTH

*DB*  
Examiner

Name approval  
\_\_\_\_\_  
C  
\_\_\_\_\_  
M

Filing fee: Minimum \$250

TO BE FILLED IN BY CORPORATION  
Contact Information:

Andrew S. Levine, Esq.  
\_\_\_\_\_  
Donoghue, Barrett & Singal, P.C.  
\_\_\_\_\_  
1 Beacon St., Ste. 1320, Boston, MA 02108  
\_\_\_\_\_  
Telephone: 617-598-6700  
\_\_\_\_\_  
Email: alevine@dbslawfirm.com  
\_\_\_\_\_

Upon filing, a copy of this filing will be available at [www.sec.state.ma.us/cor](http://www.sec.state.ma.us/cor). If the document is rejected, a copy of the rejection sheet and rejected document will be available in the rejected queue.

## Summary of Business Plan

In Good Health's (IGH) three-year business plan is based on a number of operational and budgetary assumptions as detailed in the following discussion. These strategic planning assumptions inform IGH's projections for utilization, revenue and expenses which are attached to this summary.

IGH's proposed co-located RMD and adult-use marijuana establishment will be sited in the City of Brockton, which is the seventh largest city in Massachusetts with approximately 100,000 residents according to the latest census bureau information. IGH's primary service area of eighteen cities and towns (including Brockton) has a population in excess of 400,000 individuals.

As of May 31, 2018, the Department of Public Health (Department) issued final certificates of registration to 42 RMDs (31 currently approved to sell, and 11 pending approval to sell); and it processed more than 55,000 registration applications for qualifying patients. As of July 2, 2018, the Cannabis Control Commission (Commission) received completed application submissions from 22 marijuana cultivator applicants; 15 marijuana product manufacturer applicants; and 19 marijuana retailer applicants.

In its first full year of RMD operations in 2016, IGH sold a total of 625 pounds of marijuana, based on approximately 50,500 total patient visits to the RMD (6,000 unique patient visits), with the average purchase of \$125.00 per visit. In its second full year of RMD operations in 2017, IGH sold a total of 1044 pounds of marijuana, based on approximately 82,800 total patient visits (8,000 unique patient visits), with the average purchase remaining at \$125.00 per visit.

IGH projects that its established RMD operation visits and sales will remain strong over the next three years as there is still a limited number of RMD's serving the registered patient population. RMD medical sales will also remain strong due to IGH's establish home delivery program, which accounted for approximately 6% of IGH's total medical sales throughout 2016 and 2017. IGH will be in an advantageous position to commence its co-located medical and adult-use operations by leveraging its existing marijuana cultivation, processing and dispensing infrastructure, with a projected lead time of only four months from the receipt of provisional licensure from the Commission to full operation of co-located medical and adult use marijuana program services.

With combined medical and adult-use marijuana programs operational, IGH projects **first year** gross revenues of \$17,500,000, expenses of \$12,425,000, with excess revenues of \$5,075,000, approximately 112,000 total visits, and 78 full-time employees; **second year** gross revenues of \$35,000,000, expenses of \$24,850,000, with excess revenues of \$10,150,000, approximately 168,000 total visits, and 85 full-time employees; and **third year** gross revenues of \$50,000,000, expenses of \$35,500,000, with excess revenues of \$14,500,000, approximately 280,000 total visits, and 100 full-time employees.

IGH conservatively projects that in the first year of co-located operations the ratio of medical patient to adult consumer visits to the Brockton marijuana establishment will be 2:1; in the second year medical patient to adult consumer visits will be 3:1; and in the third year medical

In Good Health, Inc.  
RMD Priority Applicant: RPA201826

patient to adult consumer visits will be 4:1. IGH also projects that the average purchase amount per visit will remain at \$125.00 per individual.

Retail pricing for IGH's medical and adult-use marijuana products will be \$350.00 per ounce. Vaporizer cartridges and other accessories will be available for purchase for \$40.00 to \$80.00. Wholesale transactions to other RMD's and/or marijuana establishments will be priced at \$250.00 per ounce (\$4,000/lb).

IGH currently employs 48 full-time employees to run its medical marijuana operations and projects that it will need to employ an additional 30-32 full-time employees in the first year of co-located medical and adult-use marijuana operations (16 FTEs for adult-use retail and dispensing operations; 4 FTEs for marijuana processing/kitchen staff; 6 FTEs for trim room; 3 FTEs for packaging; and 3 additional FTEs projected for other administrative functions). IGH projects that in each of the second and third years of co-located medical and adult-use operations it will need to employ an additional 15 full-time employees to meet increased workload and demand.

Payroll expenses are projected to be \$4,899,960 in year one, \$5,193,968 in year two, and \$5,824,000 in year three. Projected payroll expenses include all payroll taxes, workers compensation insurance, and per employee per month healthcare benefit costs. Payroll expenses are projected to increase proportionately with added hiring and fair salary increases to IGH's existing employees.

Operating expenses (excepting payroll) are projected to be \$7,525,040 in year one, \$19,656,032 in year two, and \$29,676,000 in year three. Operating expenses (excepting payroll) include ongoing expenses related to legal services and other expert consultant services, annual licensing/application fees, rent for the leased premises in Brockton, standard office expenses (e.g., computer, telephone and utilities and other general equipment), security, maintenance of delivery vehicles and associated registration and auto insurance premiums, general and product liability insurance premiums, and associated federal and state taxes. Depreciation and amortization on outstanding notes are calculated in accordance with all applicable federal and state guidelines and with generally accepted accounting principles.

IGH recently entered into an amended and restated lease agreement for its facility in Brockton. The amended and restated lease is for an initial term of 10 years, with associated expenses for rent and taxes stated therein. In connection therewith, IGH will lease an additional 29,000 square feet at the leased premises to accommodate increased medical and adult-use marijuana business operations and production. IGH's lease of the additional square footage is contingent on obtaining necessary governmental approvals for the build-out or intended use. Rental rates for the additional leased space will go into effect on December 1, 2018 and will be deferred for a period of six months.

Federal tax liabilities are projected at a rate of 21% based on the projected revenues for the next three years. Massachusetts state tax liabilities specific to adult use marijuana sales are projected to be \$500,000 in year one, \$4,000,000 in year two, and \$5,000,000 in year three.

In Good Health, Inc.  
RMD Priority Applicant: RPA201826

**Three-Year Business Plan Budget Projections (selected)**

**In Good Health, Inc.**

	<b>First Year Projections <u>2018</u></b>	<b>Second Year Projections <u>2019</u></b>	<b>Third Year Projections <u>2020</u></b>
Projected Revenue	17,500,000	35,000,000	50,000,000
Projected Expenses Including Taxes	12,425,000	24,850,000	35,500,000
VARIANCE:	5,075,000	10,150,000	14,500,000
Number of unique visits for the year (medical and adult)	8520	12,780	21,300
Number of visits for the year (medical and adult)	112,180	168,269	280,449
Projected % growth rate annually	---	34%	40%
Estimated purchased per visit	\$125.00	\$125.00	\$125.00
Estimated cost per ounce	\$350.00	\$350.00	\$350.00
Total FTE in staffing	78 FTE	85 FTE	100 FTE
Total Marijuana Inventory for the year (lbs.)	3483	5840	8198
Total Marijuana sold for the year (lbs.)	2850	4672	6558
Total Marijuana left for roll over (lbs.)	633	1168	1640



In Good Health, Inc.  
RMD Priority Applicant: RPA201826

**Business Hours and After-hours Contact**

In Good Health, Inc. will continue to be open for business during the following hours:

8:00am – 7:00pm seven days per week

The after-hours point of contact for IGH is:

David Noble  
President/CEO  
[dnoble@ingoodhealthma.com](mailto:dnoble@ingoodhealthma.com)  
617-869-1855

**IN GOOD HEALTH, INC.**  
**COLOCATED MARIJUANA OPERATION [BROCKTON]**  
**POLICY: SEPARATING RECREATIONAL FROM MEDICAL OPERATIONS**

**POLICY**

In Good Health, Inc. (“IGH”) operates a colocated medical- and adult-use cultivation, product manufacturing, and retail operation at its facility in Brockton, MA and ensures the physical separation of medical- and adult-use operations as required by 935 CMR 500.140(14) and 935 CMR 501.140(12).

**PROCEDURE**

1. IGH dispensing areas for medical- and adult-use marijuana will be physically separated by a semi-permanent barrier and accessible through separate corridors following initial check-in with security staff to confirm valid proof of identification. IGH shall exercise its best effort to prioritize Registered Qualifying Patient and Personal Caregiver identification and entry.
2. Medical-use Registered Qualifying Patients and Personal Caregivers with a Commission-issued registration card will be permitted to access any dispensing line and will not be limited to the medical-use program dispensing line.
3. IGH will also maintain its expressly labeled, enclosed consultation area away from the dispensing/sales area, in an easily accessible location, to allow IGH Agents and Registered Qualifying Patients to speak privately and confidentially.
4. Using its inventory software tracking and point of sales systems, Metrc and LeafLogix, IGH will record each dispensing/sales transaction and the separation of the adult-use and medical marijuana inventory at the point of sale. Applicable excise, sales, and local taxes will be applied at the point of sale to all adult-use dispensing transactions and non-marijuana purchases.
5. All marijuana and marijuana products sold will be labeled and packaged according to the respective requirements of the medical- and adult-use program regulations.

*In compliance with 935 CMR 500.105(1) and 935 CMR 501.105(1), this operating procedure is a part of the single set of written operating procedures applicable to IGH’s colocated marijuana operation and complies with both medical-use and adult-use requirements.*

**APPROVED BY:**

\_\_\_\_\_  
[Insert Name]

\_\_\_\_\_  
Date

**IN GOOD HEALTH, INC.**  
**COLOCATED MARIJUANA OPERATION [BROCKTON]**  
**POLICY: RECORD RETENTION**

**POLICY**

In Good Health, Inc. (“IGH”) retains business and clinical records for a period of time no less than required by law and in accordance with 935 CMR 500.105(9) and 935 CMR 501.105(9). Such records include but are not limited to written operating procedures and inventory and seed-to-sale tracking, personnel, general business and financial, sales and dispensing, and waste disposal records. The IGH Executive Management team is responsible for the proper retention, storage and disposal of records that IGH generates, maintains and/or receives in the course of doing business.

**PROCEDURE**

1. IGH protects the security, privacy and confidentiality of records as required by law, contract, or regulatory body, including those records containing confidential information. This includes Registered Qualifying Patient, Personal Caregiver, and employee records containing such information.
2. All records subject to confidentiality restrictions are stored securely, whether electronically or in hard copy.
3. IGH conducts an annual review of the records it maintains to determine whether they have reached their disposal date.
4. All records that may substantially affect the rights and obligations of IGH are retained for a period of time and in a manner that will allow for the availability of those records when needed.
5. IGH records shall be made available for inspection by the Cannabis Control Commission (“the Commission”) upon request in accordance with 935 CMR 500.105(9) and 935 CMR 501.105(9).
6. IGH shall maintain all records that are required by any section of 935 CMR 500.000 and 935 CMR 501.000, in addition to the specific records described in the Record Retention Schedule attached hereto as Appendix A. See also 935 CMR 500.105(9)(a)-(f) and 935 CMR 501.105(9)(a)-(f). The Record Retention Schedule also sets forth required retention periods for specific types of records and is used to determine the appropriate retention period for certain IGH records.
7. Following any closure of IGH, all records will be securely maintained for at least two (2) years at the expense of IGH and in a form and location acceptable to the Commission in accordance with 935 CMR 500.105(9)(g) and 935 CMR 501.105(9)(g).

*In compliance with 935 CMR 500.105(1) and 935 CMR 501.105(1), this operating procedure is a part of the single set of written operating procedures applicable to IGH's colocated marijuana operation and complies with both medical-use and adult-use requirements.*

**APPROVED BY:**

\_\_\_\_\_  
[Insert Name]

\_\_\_\_\_  
Date

## APPENDIX A

### RECORD RETENTION SCHEDULE

#### General Records

<b>Record Type</b>	<b>IGH Retention Period</b>
Operating procedures	Indefinitely
Inventory records	Indefinitely
Seed-to-sale tracking records for marijuana and marijuana products	Indefinitely
Video recordings from IGH security system	90 calendar days, unless IGH is aware of a pending criminal, civil or administrative investigation, or legal proceeding for which the recording may contain relevant information
Incident reports submitted to the Commission and local law enforcement	Indefinitely
Waste disposal records	3 years
Shipping manifests and transportation logs	1 year
Marijuana and marijuana product testing results	1 year
Records pertaining to Registered Qualifying Patients and Personal Caregivers	Indefinitely

#### Business Records

<b>Record Type</b>	<b>IGH Retention Period</b>
Assets and liabilities	10 years
Monetary transactions	10 years
Books of accounts, including journals, ledgers, and supporting documents, agreements, checks, invoices and vouchers	10 years
Sales records indicating the quantity of marijuana dispensed, its form, cost, and, if applicable, the Registered Qualifying Patient or Personal Caregiver name	10 years
Salary and wages paid to each employee, stipend paid to each board member, and any stipend, executive compensation, bonus, benefit, or item of value paid to any individual affiliated with IGH, including individuals or entities with direct or indirect control over the IGH corporation, if any	10 years

#### Personnel Records

<b>Record Type</b>	<b>IGH Retention Period</b>
Job descriptions for all employees and volunteers	Indefinitely

Organizational charts consistent with job descriptions	Indefinitely
Staffing plan(s) demonstrating accessible business hours and safe cultivation conditions	Indefinitely
Personnel policies and procedures	Indefinitely
CORI reports obtained in accordance with M.G.L. c. 6, § 172, 935 CMR 500.030, 935 CMR 501.030, and 803 CMR 2.00	Duration of employment plus 6 years
Individual personnel file for each Dispensary Agent, including: <ol style="list-style-type: none"> <li>1) All materials submitted to the Commission pursuant to 935 CMR 500.030 and 935 CMR 501.030;</li> <li>2) Documentation of verification of references;</li> <li>3) Job description or employee contract that includes duties, authority, responsibilities, qualifications, and supervision;</li> <li>4) Documentation of required employee trainings;</li> <li>5) A copy of the application IGH submitted to the Commission on behalf of any prospective MTC agent;</li> <li>6) Periodic performance evaluations;</li> <li>7) Notice of completed Responsible Vendor Training Program and in-house training required by the Commission; and</li> <li>8) Disciplinary actions taken.</li> </ol>	Duration of employment plus 6 years

**IN GOOD HEALTH, INC.**  
**COLOCATED MARIJUANA OPERATION [BROCKTON]**  
**POLICY: MAINTENANCE OF FINANCIAL RECORDS**

**POLICY**

In Good Health, Inc. (“IGH”) retains general business and financial records in accordance with generally accepted accounting principles and 935 CMR 500.105(9) and 500.140(5) and 935 CMR 501.105(9) and 501.140(5).

**PROCEDURE**

1. IGH will maintain business and financial records including manual or computerized records of the following:
  - a. Assets and liabilities;
  - b. Monetary transactions;
  - c. Books of accounts, including journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
  - d. Sales records indicating the name of the Registered Qualifying Patient or Personal Caregiver to whom IGH has dispensed medical marijuana or marijuana products, if applicable, and the quantity, form, and cost of marijuana or marijuana products dispensed; and
  - e. Salary and wages paid to employees, stipends paid to members of the board of directors, and any other stipends, executive compensation, bonus, benefit, or item of value paid to any affiliates of IGH, including individuals or entities with direct or indirect control.
2. IGH will use a point-of-sale system, approved by the Cannabis Control Commission (the “Commission”), that records sales in accordance with requirements set forth by the Massachusetts Department of Revenue (the “DOR”), 935 CMR 500.140(5), and 935 CMR 501.140(5). IGH will conduct monthly inspections of equipment and sales data to ensure that it has not been manipulated or altered. Records of inspection will be made available to the Commission upon request and any discovery of manipulation or alteration of sales data or attempts to do so will be reported to the Commission immediately.
3. IGH’s point of sale system will utilize separate accounting practices for marijuana and marijuana product sales and non-marijuana sales. This system will also separate medical and adult-use marijuana and marijuana product sales. Adult-use and non-marijuana sales will comply with Massachusetts tax laws and rules and regulations implemented by the DOR.
4. For medical sales, IGH will track Registered Qualifying Patient and Personal Caregiver information in compliance with the Commission’s regulations.

5. For all sales, IGH will track marijuana and marijuana product inventory sold in compliance with the Commission’s regulations. Records of marijuana and marijuana product sales will be maintained for no less than one year and will be available upon request. See IGH’s Record Retention Plan for information.

*In compliance with 935 CMR 500.105(1) and 935 CMR 501.105(1), this operating procedure is a part of the single set of written operating procedures applicable to IGH’s colocated marijuana operation and complies with both medical-use and adult-use requirements.*

**APPROVED BY:**

\_\_\_\_\_

[Insert Name]

\_\_\_\_\_

Date

**IN GOOD HEALTH, INC.**  
**COLOCATED MARIJUANA OPERATION [BROCKTON]**  
**POLICY: QUALIFICATIONS AND TRAINING**

**POLICY**

In Good Health, Inc. (“IGH”) ensures that all Marijuana Establishment and Medical Marijuana Treatment Center (“MTC”) agents complete a comprehensive training and orientation program prior to performing any related job functions in accordance with 935 CMR 500.105(2) and 935 CMR 501.105(2). Training will be tailored to the roles and responsibilities of the job function of each agent. In addition to initial new employee orientation, agents shall receive at least eight (8) hours of on-going training annually with equal training time allotted or addressing compliance with medical and adult-use program regulatory requirements and many of the materials from the new employee orientation being updated with additional training throughout the year. At least four (4) hours of annual training must be from the Responsible Vendor Training Program pursuant to 935 CMR 500.105(2)(a)2. and 935 CMR 501.105(2)(a)2.

Most training sessions shall be conducted in a live format with active learning techniques used to verify that attendees have obtained adequate knowledge of the particular topic including a post-test for each session. A few sessions shall be conducted virtually, such as some recreational compliance training. In addition, a written list of attendees of each session shall be recorded, dated, signed by the instructor and kept in a readily retrievable file.

Agent training will be focused on the following areas:

- ✓ Regulatory Compliance
- ✓ Patient/Caregiver Registration and Confidentiality
- ✓ Adult Retail Identification
- ✓ Safe Marijuana Handling Practices
- ✓ Security and Diversion
- ✓ Inventory and Point-of-Sale Records
- ✓ Responsible Vendor Program pursuant to 935 CMR 500.105(2)(b) and 935 CMR 501.105(2)(b)
- ✓ Privacy

**PROCEDURE**

1. New employees shall attend a mandatory orientation session conducted by the Director of Compliance (or designee) prior to commencing any job activities in the IGH facility. The orientation shall include an overview of all aspects of the IGH facility regardless of the staff member’s specific job responsibilities.
2. At the orientation, new employees shall attend a session regarding the Cannabis Control Commission’s (“the Commission”) regulations (935 CMR 500.000 et seq. and 935 CMR

501.000 et seq.) and shall be given sufficient background on the purpose and scope of these regulations. Additional sessions will be provided at least quarterly or more frequently, as necessary, depending on whether there are any new updates to the Commission's Marijuana Establishment or MTC regulations or any other relevant regulations.

3. At staff orientation there will be a session regarding the proper method for verifying a Registered Qualifying Patient's or Personal Caregiver's Commission-issued registration card and additional identification documents required for medical- and adult-use transactions. Information provided shall focus on the type of identification documents required by the Commission regulations and related policies for verifying this information for both on-site dispensing, retail, and home deliveries.
4. All new staff within each of IGH's divisions (cultivation, product manufacturing, and dispensing) will receive orientation and training around the safe handling of marijuana. These sessions shall be conducted by the specific IGH management personnel responsible for the particular area of focus.
5. All new staff will receive training on the responsible use of marijuana and marijuana products. Such training shall include the safe use of the products, interactions with other medications, methods of taking marijuana and marijuana products, testing procedures, types and strains and effectiveness, as well as general requirements for the use of marijuana.
6. Prior to work commencement relative to IGH's MTC business, new employees will be instructed on all aspects of patient case management and related policies and procedures. The training will include an overview of the initial intake process, including forms and patient communications, an evaluation of patient needs, and patient follow up. This session shall also focus on the requirement for training on patient confidentiality, including HIPAA compliance.
7. The new employee orientation and ongoing training sessions shall include a section on security and diversion. The training will be conducted by the IGH VP-Security Services and shall include physical plant security, delivery security, Consumer, Registered Qualifying Patient, Personal Caregiver and visitor security measures, incident (robbery) protocols and prevention and reporting of diversion.
8. The IGH Director of Cultivation shall provide a comprehensive overview of the growing, cultivation and processing of marijuana plants. This section shall include a detailed description of the growing process from seed/clone to finished product, processing of marijuana products and laboratory testing.
9. All existing and new IGH staff will be cross-trained on how to perform their respective job duties and responsibilities in compliance with both the medical and adult-use

marijuana regulations. Such cross-training will include, but not be limited to, training dispensing staff on differences in point-of-sale transactions for Registered Qualifying Patients and Personal Caregivers and adult-use retail sales, training packaging staff on the different labeling requirements for marijuana and marijuana products that will be dispensed in the medical and adult-use programs, and training all applicable staff on appropriate inventory and recordkeeping requirements for medical and adult-use program requirements.

10. All existing and new IGH staff will seek dual registration status as an MTC agent and Marijuana Establishment agent with the Commission. In order to meet all training requirements under each license type, agents may be required to participate in more than eight (8) training hours per year.
11. All employees shall obtain training on the use of the IGH computer systems with regard to their specific job descriptions. Retail dispensing agents shall be trained in the point-of-sale system; security staff shall learn the security systems; and cultivation staff shall learn the seed-to-sale component.
12. Senior Management shall participate in the orientation sessions as needed and will ensure that the sessions are adequate for the successful initial training of new employees and for the ongoing education of all IGH staff.

*In compliance with 935 CMR 500.105(1) and 935 CMR 501.105(1), this operating procedure is a part of the single set of written operating procedures applicable to IGH's colocated marijuana operation and complies with both medical-use and adult-use requirements.*

**APPROVED BY:**

\_\_\_\_\_  
[Insert Name]

\_\_\_\_\_  
Date

**IN GOOD HEALTH, INC.**  
**COLOCATED MARIJUANA OPERATION [BROCKTON]**  
**POLICY: PERSONNEL POLICIES**

**POLICY**

In Good Health, Inc. (“IGH”) maintains confidential personnel records in accordance with 935 CMR 500.105(9)(d) and 935 CMR 501.105(9)(d). Access to personnel records is limited to the IGH Executive Management Team and the applicable employee or his/her designated representative(s). IGH personnel policies and procedures are more fully described in the IGH Employee Handbook.

**PROCEDURE**

1. IGH shall maintain the following personnel records:

- a) Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
- b) A personnel record for each Medical Marijuana Treatment Center (“MTC”) and Marijuana Establishment Agent. Such records shall be maintained for at least six (6) years after termination of the individual’s affiliation with IGH and shall include, at a minimum, the following:
  - i) All materials submitted to the Cannabis Control Commission (“the Commission”) pursuant to 935 CMR 500.030(2) and 935 CMR 501.030;
  - ii) Documentation of verification of references;
  - iii) The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
  - iv) 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;
  - v) A copy of the application that IGH submitted to the Commission on behalf of any prospective MTC Agent;
  - vi) A notice of completed responsible vendor and eight (8)-hour training for any Agent;
  - vii) Documentation of periodic performance evaluations; and

- viii) A record of any disciplinary action taken.
  - c) A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
  - d) Personnel policies and procedures, as further described in the IGH Employee Handbook; and
  - e) CORI reports obtained in accordance with M.G.L. c. 6, § 172, 935 CMR 500.030, 935 CMR 501.030, and 803 CMR 2.00.
2. All CORI reports obtained by IGH in accordance with M.G.L. c. 6, § 172, 935 CMR 500.030, 935 CMR 501.030, and 803 CMR 2.00 will be kept separate from general personnel records. Copies of any additional, ongoing CORI reports obtained by IGH concerning its Agents after initial hire will be submitted to the Commission.
  3. IGH employees may inspect and/or receive copies of the documents in their personnel file upon request. The procedure for receiving such copies is further outlined in the IGH Employee Handbook.
  4. IGH personnel records will be made available to the Commission for inspection upon request.
  5. IGH will immediately dismiss any Agent who has diverted marijuana, engaged in unsafe practices, or has been convicted or entered a guilty plea for a felony charge of distribution of a drug to a minor.
  6. The IGH Employee Handbook contains policies ensuring an alcohol, smoke, and drug-free workplace.
  7. The IGH Employee Handbook also contains IGH's Code of Ethics and Whistleblower Policy, as well as a policy notifying persons with disabilities of their rights under state and federal law, their right to protection from discrimination, and their right to reasonable accommodations.

*In compliance with 935 CMR 500.105(1) and 935 CMR 501.105(1), this operating procedure is a part of the single set of written operating procedures applicable to IGH's colocated marijuana operation and complies with both medical-use and adult-use requirements.*

**APPROVED BY:**

---

[Insert Name]

---

Date

**IN GOOD HEALTH, INC.**  
**COLOCATED MARIJUANA OPERATION [BROCKTON]**  
**POLICY: SAMPLING AND ANALYSIS OF PRODUCTION BATCHES**

**POLICY**

In Good Health, Inc. (“IGH”) contracts with an independent analytical laboratory for testing of all marijuana production batches to ensure that all products meet applicable standards set by the Cannabis Control Commission (“the Commission”). Testing of marijuana shall be in compliance with all requirements under 935 CMR 500.105(3) and 500.160 and 935 CMR 501.105(3) and 501.160.

**PROCEDURE**

**I. GENERAL PROCEDURES**

1. IGH is responsible for having all marijuana cultivated at its facility tested in accordance with the requirements of 935 CMR 500.160 and 935 CMR 501.160.
2. IGH shall ensure that only the leaves and flowers of the female marijuana plant are processed accordingly in a safe and sanitary manner, which includes ensuring that the leaves and flowers are well-cured and generally free of seeds and stems; free of dirt, sand, debris, and other foreign matter; and free of contamination by mold, rot, other fungus, and bacterial diseases, satisfying the sanitation requirements in 105 CMR 500.000: *Good Manufacturing Practices for Food*, and if applicable, 105 CMR 590.000: *State Sanitary Code Chapter*.
3. All IGH Agents whose job includes contact with marijuana or non-edible marijuana infused products are subject to the food handler requirements specified at 105 CMR 300.000.
4. All IGH Agents whose job includes direct contact with marijuana must conform to sanitary practices while at work, including maintaining adequate personal cleanliness and washing hands appropriately.
5. IGH shall provide handwashing facilities which are adequate, convenient, and furnished with running water at a suitable temperature. These facilities will be located in production areas and areas where good sanitary practices require employees to wash and/or sanitize their hands. The facilities shall also provide effective hand-cleaning and sanitizing preparations, as well as sanitary towel service or suitable drying devices.
6. IGH will ensure there is sufficient space for equipment and storage of materials as is necessary to maintain sanitary operations.

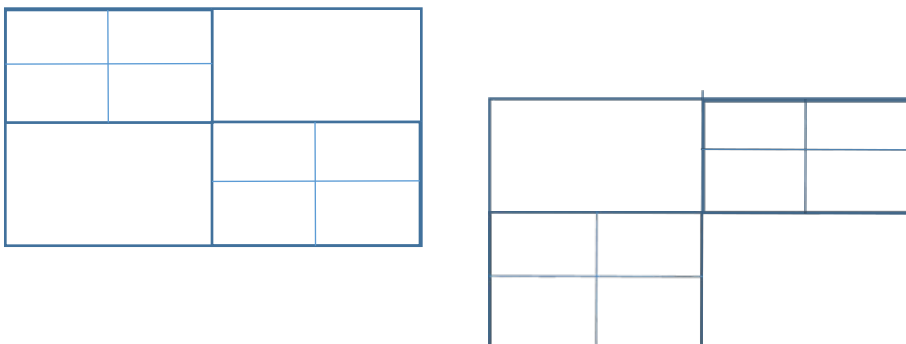
7. IGH Agents shall properly remove litter and waste to minimize the development of odor and the potential attraction and harboring of pests.
8. IGH's floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair.
9. IGH will install adequate safety lighting in all processing and storage areas, and all other areas where equipment and utensils are cleaned.
10. IGH's buildings, fixtures, and other physical facilities will be maintained in a sanitary condition.
11. IGH will maintain, clean, and sanitize all contact surfaces as frequently as necessary to protect against contamination using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions.
12. IGH will identify, hold, and store all toxic items in a manner that protects against the contamination of marijuana.
13. IGH shall maintain a water supply sufficient for necessary operations.
14. IGH's plumbing shall be of adequate size and design and maintained to carry sufficient quantities of water to required locations throughout the establishment.
15. IGH will provide Agents with adequate, readily accessible toilet facilities.
16. Marijuana shall be tested for the cannabinoid profile and for contaminants as specified by the Commission, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of non-organic pesticides. Additional testing will be conducted as requested by the Commission.
17. IGH shall also ensure that final ready-to-sell vaporizer products are screened for heavy metals and Vitamin E Acetate per the Commission's requirements.
18. All marijuana testing must be conducted in compliance with M.G.L. c. 94G, § 15 and Commission protocols by an independent laboratory that is:
  - a) *Accredited to International Organization for Standardization (ISO) 17025* by a third party accrediting body such as A2LA or ACLASS; or
  - b) Certified, registered, or accredited by an organization approved by the Commission.
19. IGH shall arrange for marijuana testing to be conducted in accordance with the frequency required by Commission.

20. IGH maintains all marijuana testing results for a minimum of one (1) year and will retest any marijuana and marijuana products with testing dates exceeding one (1) year.
21. No member of the IGH Executive Management Team or member of the IGH corporation may have any financial or other interest in the laboratory providing testing services for IGH. No individual employee of the laboratory providing testing services for IGH may receive direct financial compensation from IGH.
22. Transportation of marijuana from the IGH facility to the testing laboratory shall comply with the requirements under 935 CMR 500.105(13) and 935 CMR 501.105(13). Refer to IGH's Transportation of Marijuana and Marijuana Products Policy.
23. Storage of marijuana at the laboratory providing testing services for IGH shall comply with the requirements of 935 CMR 500.105(11) and 935 CMR 501.105(11).
24. All excess marijuana left over from the testing at the laboratory must be returned to IGH and will be disposed of pursuant to 935 CMR 500.105(12) and 935 CMR 501.105(12).
25. The testing laboratory will generate a laboratory data package regarding each tested sample which will include:
  - a) A case narrative describing sample receipt, preparation and analytical issues encountered and analytical methods used, along with a signed statement as to the accuracy and completeness of the results;
  - b) Chains-of-custody paperwork; and
  - c) Summary of the analytical results.
26. In accordance with the requirements under 935 CMR 500.160 and 935 CMR 501.160, when the independent testing laboratory results indicate unacceptable contaminant levels, all marijuana with the same batch number as the contaminated sample will be promptly removed from the applicable cultivation or storage area and transferred to the disposal room. The unacceptable contaminant levels will be noted in the Metrc and LeafLogix systems and inventory records adjusted accordingly. In accordance with 935 CMR 500.160 and 935 CMR 501.160, the VP-Operations and the Director of Cultivation will review the data package provided by the testing laboratory concerning the marijuana sample, cultivation records for that batch number, including the type of growing media, pesticides used, employees who handled the marijuana, etc., to assess the source of contamination. Video surveillance tapes may also be reviewed as necessary to assist in this process. Identified sources and circumstances of the contamination will be noted in the Metrc and LeafLogix systems and additional employee training will be provided when indicated. Sources of contamination which may also affect other marijuana plants will be eliminated. IGH's Inventory Management Policy, and its quality control procedures contained in this Policy will be made available to Consumers, Registered Qualifying Patients and Personal Caregivers upon request.

27. Both IGH and the independent testing laboratory shall report unacceptable testing results that cannot be remedied to the Commission within seventy-two (72) hours in compliance with 935 CMR 501.160(4)(a)(1) and 935 CMR 501.160(3)(a)(1). IGH will propose a remedying plan at this time.
28. If IGH is notified that any marijuana or marijuana product has failed contaminant testing, it will reanalyze, remediate, or dispose of the affected marijuana or marijuana product in accordance with 935 CMR 500.160(13) and 935 CMR 501.160(12).

**II. SAMPLING**

1. IGH’s contracted independent analytical laboratory will sample all products to be certified using the Quartering method appropriate for the material sampled. All sampling will be in accordance with Sections 5.0-5.3 in the Commission’s *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations*. Any product that fails specified requirements may be retested once and upon a second failure, must be destroyed according to Commission guidelines. Upon passing the required testing, labels will be produced, and the products will be released for sale.
2. If necessary, each flower batch will be broken into TESTING LOTS of up to 2 kg of flower. The testing lot will be separated into equal quadrants. Each quadrant will be quartered. Opposite quadrants will be quartered and random samples from each will be collected to reach the volume necessary for the sample required.



3. Due to the inhomogeneity of raw plant material, multiple 2-gram samples will be collected from each lot, depending on the size of the lot to be tested. For the 2 kg lot size, 5 sub-samples will be collected. For lot sizes smaller than 1 kg, 3 sub-samples will be sufficient. In each case, the sub-samples will be composited for testing.
4. After sampling, flower will be placed in containers and sealed with security tape and quarantined while awaiting testing results. For chain of custody, total weight and sample

weight will be witnessed and recorded. Crop batch data along with batch ID will also be collected.

5. All material will be sent to the lab to be tested for: PESTICIDES, PGR's and HEAVY METALS.
6. Upon passing the testing requirements, the lot will be available for further processing, or for additional testing if flower is intended for direct consumption.
7. All flower material for direct consumption will also be tested for: BACTERIA, FUNGI, MYCOTOXINS, CANNABINOIDS: THCA, CBDA, CBGA, CBD, D8-THC, D9-THC, CBG, CBC, and CBN.
8. Upon passing the testing requirement, the batch will be certified and released for sale with labeling information. Labels will be designed within the lab to meet requirements. By following this protocol, product dispensed will be able to be sold as TESTED & CERTIFIED and labeled as such.

### **III. CANNABIS RESINS**

1. All sampling will be in accordance with Sections 5.0-5.3 in the Commission's *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations*. After samples have been taken the product will be quarantined and placed in a tamper proof location until test results are processed. Upon passing the required testing, labels will be produced, and the products will be released for sale.
2. If cannabis resins can be adequately homogenized, then a single 0.5-gram random sample will be collected and sent to the lab for testing of HEAVY METALS. For cannabis resins to be dispensed as resins, an additional 1.5-gram random sample will be collected and sent to the lab for testing for BACTERIA, FUNGI, MYCOTOXINS and CANNABINOIDS. All cannabis resins that are being used to create marijuana products will be further tested in the post-marijuana products production for BACTERIA, FUNGI, MYCOTOXINS and CANNABINOIDS.

### **IV. CANNABIS CONCENTRATES**

1. All sampling will be in accordance with Sections 5.0-5.3 in the Commission's *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations*. After samples have been taken the product will be quarantined and placed in a tamper proof location until test results are processed.

2. If concentrate can be adequately homogenized, then a single 0.5-gram random sample will be collected and sent to the lab for testing of HEAVY METALS and SOLVENTS. For concentrates to be dispensed as concentrates and additional 1.5 grams random sample will be collected and sent to the lab for testing for BACTERIA, FUNGI, MYCOTOXINS and CANNABINOIDS. All concentrates that are being used to create marijuana products will further be tested post-marijuana products production for BACTERIA, FUNGI, MYCOTOXINS and CANNABINOIDS.

## **V. MARIJUANA PRODUCTS**

1. All sampling will be in accordance with Sections 5.0-5.3 in the Commission's *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations*. After samples have been taken the product will be segregated and placed in a tamper proof location until test results are processed. Upon passing the required testing, labels will be produced, and the products will be released for sale.
2. Random samples will be collected in individual serving size units and sent to the lab for testing of BACTERIA, FUNGI, MYCOTOXINS and CANNABINOIDS.

## **VI. TESTING METHODOLOGIES**

1. Analytical procedures for determining cannabinoid profiles will follow the methods described in AHP 2013.
2. Quantification of metals will be performed with a validated method such as provided by the FDA USP, Chapter 233.
3. Pesticides residues and plant growth regulator testing will attempt to analyze as many compounds on the USDA target analyte list as possible, using methods that are consistent with the following sections of the National Organic Program Handbook: Guidance and Instructions for Accredited Certifying Agents and Certified Operations – NOP 2611, NOP 2611-1 and NOP 2613.
4. Methods for identifying microbiological contaminants will be consistent with USP chapters 61, 62 and 561.
5. Methods for determining residual solvent concentrations will be performed in accordance with USP chapter 467.

*In compliance with 935 CMR 500.105(1) and 935 CMR 501.105(1), this operating procedure is a part of the single set of written operating procedures applicable to IGH's colocated marijuana operation and complies with both medical-use and adult-use requirements.*

**APPROVED BY:**

---

[Insert Name]

---

Date

**IN GOOD HEALTH, INC.**  
**COLOCATED MARIJUANA OPERATION [BROCKTON]**  
**POLICY: DIVERSITY PLAN**

**POLICY**

In Good Health (“IGH”) seeks to promote equity among people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, women, veterans, persons with disabilities, and LGBTQ+ people by including them in IGH’s operation of a colocated Medical Marijuana Treatment Center (“MTC”) and Marijuana Establishment in accordance with 935 CMR 500.101(1)(c)(8)(k) and 935 CMR 501.101(1)(c)(8)(k). IGH’s Director of Compliance will be responsible for implementing and tracking the goals, programs, and metrics identified in this Plan.

**PROCEDURE**

1. IGH’s goals for this Diversity Plan include:

- a. Increasing the number of individuals falling into the above-referenced demographics working at IGH’s colocated MTC and Marijuana Establishment and providing tools to ensure their success; and
- b. Increasing the number of individuals falling into the above-referenced demographics in management or other key staff roles at IGH’s colocated MTC and Marijuana Establishment and providing tools to ensure their success.

2. IGH will implement the following program to meet these goals:

- a. Advertising employment opportunities in diverse publications and with career centers that are tailored to individuals falling in the above-referenced demographics;
  - i. IGH will post all advertisements for employment opportunities at its MTC and Marijuana Establishment in the local newspaper, *The Enterprise*, to ensure such opportunities are widely disseminated in the Brockton community. In addition, IGH will post advertisements for employment opportunities with MassHire Greater Brockton Career Center in an effort to reach a diverse pool of job applicants.
- b. Hosting job fairs, either directly or in partnership with local organizations such as Massasoit Community College, with a focus on attracting individuals from the above referenced demographics; and
  - i. IGH will also aim to host/co-host at least one job fair each year in Brockton. Representatives of IGH will have a table at each job fair and discuss current employment opportunities at the MTC and Marijuana Establishment with

interested attendees. IGH will encourage existing diverse employees to serve as representatives at these job fairs.

- c. Creation of a promotion process that employs equity principles for current employees.
  - i. In the initial year of this Diversity Plan, IGH plans to work with an independent consultant to review the demographics of its workforce and compare this data with the current labor market to identify potential areas for improvement in hiring and promotion practices.
  - ii. IGH plans to work with an independent consultant to develop tools to assist employees with career enhancement.
3. The following metrics will be tracked annually to assess IGH's progress with this plan and the achievement of the goals stated herein:
  - a. Program A:
    - i. Advertising employment opportunities in diverse publications and with career centers that are tailored to individuals falling in the above-referenced demographics.
    - ii. Metrics: 1) how many employment advertisements are placed in *The Enterprise* and with MassHire Greater Brockton Career Center; 2) how many employment applications are received as a result of such advertisements; and 3) how many individuals falling into the above-referenced demographics who applied through such advertisements are employed at IGH.
    - iii. Measurable Goal: IGH will place at least half of its employment advertisements in *The Enterprise* and with MassHire Greater Brockton Career Center.
  - b. Program B:
    - i. Hosting job fairs, either directly or in partnership with local organizations such as Massasoit Community College, with a focus on attracting individuals from the above-referenced demographics.
    - ii. Metrics: 1) number of job fairs hosted by IGH directly and/or in collaboration with local organizations such as Massasoit Community College; 2) number of attendees at each job fair; 3) number of job applications submitted as a result of such job fair; and 4) number of individuals falling into the above-referenced demographics who applied as a result of such job fair and are employed at IGH.

- iii. Measurable Goal: In the first year of full operation, IGH will hold at least one job fair in collaboration with local organizations, such as Massasoit Community College.

c. Program C:

- i. Creation of a promotion process that employs equity principles for current employees.
- ii. Metrics: 1) in the initial year of this Diversity Plan, documentation evidencing engagement of the independent consultant and results of such consultant's review; 2) the number of individuals falling into the above-referenced demographics who are employed in management or other key staff roles at IGH's co-located medical and adult-use marijuana establishment upon receipt of final adult-use licensure from the Commission; and 3) the number of promotions to management or other key staff roles at IGH for individuals falling into the above-referenced demographics one year following receipt of final adult-use licensure from the Commission, and annually thereafter.
- iii. Measurable Goal: Within the first two years of full operation, IGH will set a goal of promoting at least two individuals from the above-referenced demographics who have benefitted from the tools developed with IGH's independent consultant.

4. Annual Assessment and Acknowledgments

- a. IGH will assess the performance of this Diversity Plan annually and will report on its efforts and the identified metrics above to the Commission in accordance with its annual licensure renewal in accordance with 935 CMR 500.103(4)(b) and 935 CMR 501.103(4)(b).
- b. IGH further acknowledges the following regarding the implementation of this Diversity Plan:
  - i. All specifically named organizations in this plan have agreed to partner with IGH to implement the identified goals and programs stated herein, as applicable.
  - ii. In carrying out this plan, IGH will adhere to the requirements concerning prohibited advertising, branding, marketing, and sponsorship practices in accordance with 935 CMR 500.105(4) and 935 CMR 501.105(4).
  - iii. Any actions taken, or programs instituted by IGH in connection with this plan will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

*In compliance with 935 CMR 500.105(1) and 935 CMR 501.105(1), this operating procedure is a part of the single set of written operating procedures applicable to IGH's colocated marijuana operation and complies with both medical-use and adult-use requirements.*

**APPROVED BY:**

---

[Insert Name]

---

Date

**IN GOOD HEALTH, INC.**  
**COLOCATED MARIJUANA OPERATION [BROCKTON]**  
**POLICY: ENERGY COMPLIANCE PLAN**

**POLICY**

In Good Health, Inc. (“IGH”) has implemented processes to ensure energy efficiency and conservation in its daily operations and will continue to identify potential energy-use reduction opportunities in accordance with 935 CMR 500.105(1)(q) and 500.105(15) and 935 CMR 501.105(1)(q) and 501.105(15). The following plan details IGH’s identification of potential energy-use reduction opportunities, consideration of renewable energy generation opportunities, strategies to reduce electric demand, and engagement with energy efficiency programs, as well as proper maintenance and operation of cultivation equipment. This plan also summarizes IGH’s transportation and delivery decisions related to energy efficiency.

**PROCEDURE**

1. Identification of potential energy-use reduction opportunities and implementation plan:
  - a) In September 2014, IGH began building one of the first cultivation and manufacturing facilities. Since then, IGH has completed two additional builds, in 2017 and 2019, continuing to be more efficient with each new project. IGH worked with BLW Engineers, Inc. (“BLW”) and BKA Architects (“BKA”) throughout the planning and development of IGH’s colocated Marijuana Establishment and Medical Marijuana Treatment Center in Brockton to identify potential energy use reduction and plan for implementation of such opportunities.
  - b) IGH will monitor energy consumption through its monthly utility bills, monthly Cannabis PowerScore, and yearly Mass Save audit. Based on this data, IGH will adjust operations to reduce energy consumption through equipment such as lighting, heating, and air, if necessary.
  - c) IGH has implemented best management practices regarding water use, waste management, and pest management after reviewing the Cannabis Control Commission’s (“the Commission”) Energy and Environment Compiled Guidance.
  - d) IGH considered energy reduction opportunities such as installing LED lighting.
  - e) IGH has installed energy efficient HLPD, HVAC, and dehumidification equipment throughout its facility. The lighting in the IGH cultivation operation is set to automated dimming schedules to minimize unnecessary energy waste.

- f) IGH utilizes an Argos Drip Irrigation System, which eliminates the need for the wasteful technique of hand watering.
- g) In the future, IGH plans to have annual Mass Save audits performed and is still considering installing LED lighting in several grow rooms. IGH will provide a Mass Save audit report to the Commission as soon as the assessment results are received.<sup>1</sup>
- h) If IGH upgrades, renovates, or expands its facility, it will consult BLW, BKA, and/or Mass Save to assess the existing facility or new construction plans and discuss opportunities for energy-use reduction.
- i) If IGH's equipment fails, it will research available replacements and consult BLW and/or Mass Save, if necessary, to select energy saving equipment.

## 2. Consideration of opportunities for renewable energy generation:

- a) IGH has made and will continue to make energy supply decisions in consultation with BLW and BKA.
- b) IGH's Head of Cultivation has selected energy generation equipment that meets facility supply needs and reduces energy consumption.
- c) Annually, IGH will request a Mass Save facility assessment to evaluate its historical energy supply decisions and identify renewable options.
- d) If IGH upgrades, renovates, or expands its facility, or is in need of an equipment replacement, IGH will consult its previous Mass Save assessments and request an assessment of its proposed alterations to identify opportunities for renewable or alternative energy. IGH, in consultation with its Mass Save Sponsor, BLW, and BKA, will also consider incentive programs, such as the Solar Massachusetts Renewable Target Program, to determine whether it can install renewable or alternative energy generation sources.
- e) IGH considered renewable energy generation opportunities such as purchasing renewable energy. IGH has not yet but plans to purchase renewable energy in the upcoming year. IGH will provide a Mass Save audit report to the Commission as soon as the assessment results are received.
- f) IGH does not have energy generators. It contracts with a back-up service.

## 3. Strategies to reduce electric demand:

---

<sup>1</sup> IGH had a Mass Save facility assessment performed on December 22, 2020. Results of the assessment and formal audit report are forthcoming.

- a) Similar to energy consumption, IGH will monitor electricity demand through its monthly utility bills, monthly Cannabis PowerScore, and yearly Mass Save audit. IGH will compare the demand required by new and existing equipment to its available electricity capacity. Based on this data, IGH will adjust its demand.
  - b) Annually, IGH will have BLW evaluate its load size in tandem with the execution of an updated Energy Compliance Letter for active load management.
  - c) Should electricity demand become problematic, IGH will consult with BLW, BKA, and/or Mass Save to develop reduction opportunities in addition to its existing lighting schedules and active load management.
  - d) IGH uses scheduled lighting dimmers in its cultivation operations to reduce electricity demand required by its horticultural lighting equipment.
  - e) IGH considered electricity demand reduction opportunities such as installing LED lighting in the facility.
  - f) IGH implemented the dimming schedule and is considering installing LED lighting in some rooms in the future. IGH will provide a Mass Save audit report to the Commission as soon as the assessment results are received.
4. Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants:
- a) IGH will work with its designated Mass Save Sponsor to conduct annual facility assessments, as well as new building, major renovation, and new equipment assessments, as needed. This will help IGH stay up to date on new energy efficiency opportunities and incentives.
  - b) IGH will work with BLW and BKA to review and consider engagement with other energy efficiency programs as well.
  - c) To date, IGH has had one Mass Save facility assessment. IGH will provide a Mass Save audit report to the Commission as soon as the assessment results are received.
5. Ensuring that equipment is maintained, calibrated, and operating properly:
- a) IGH's Head of Cultivation is responsible for maintaining operations manuals and operating procedures for all equipment, including major energy using equipment. IGH's Head of Cultivation is also responsible for regularly evaluating equipment to ensure proper maintenance, calibration, and operation.

- b) All IGH Agents involved in cultivation operations that are authorized to operate equipment will undergo comprehensive training on the proper use of the equipment.
- c) BLW has executed an Energy Compliance Letter documenting the quantity and quality of IGH's equipment. IGH will have BLW, or another professional engineer, update the letter each year.

6. Making energy efficiency fleet decisions for transportation and delivery operations:

- a) IGH currently maintains five vehicles in its fleet which are used for transferring product to other licensees through wholesale operations, delivery to patients and caregivers, and cash drop-offs to the bank.
- b) IGH's fleet contains one (1) 2015 Jeep Grand Cherokee, one (1) 2016 Nissan NV200, two (2) 2017 Jeep Patriots, and one (1) 2015 Ford Transit.
- c) IGH does not use alternative fuel vehicles because its existing fleet was purchased prior to the enactment of the Commission's energy efficiency regulations and guidance and based its purchasing decisions on the safety and reliability of the above-mentioned vehicles. Should IGH need to expand its fleet, it will purchase electric or hybrid vehicles.
- d) Other energy and water conservation strategies employed at IGH's physical facility are described above.

*In compliance with 935 CMR 500.105(1) and 935 CMR 501.105(1), this operating procedure is a part of the single set of written operating procedures applicable to IGH's colocated marijuana operation and complies with both medical-use and adult-use requirements.*

**APPROVED BY:**

\_\_\_\_\_  
[Insert Name]

\_\_\_\_\_  
Date

**IN GOOD HEALTH, INC.**  
**COLOCATED MARIJUANA OPERATION [BROCKTON]**  
**POLICY: RESTRICTING ACCESS TO AGE 21 OR OLDER**

**POLICY**

In Good Health, Inc. (“IGH”) operates a colocated Medical Marijuana Treatment Center (“MTC”) and adult-use Marijuana Establishment in Brockton, MA. As a result, individuals under the age of 21 may have a need to access the facility for dispensing of marijuana and marijuana products for medical use. However, IGH shall implement strict security measures to ensure that all individuals entering the colocated facility are appropriately identified and that access to the adult-use marijuana dispensing area is limited to individuals age 21 and older.

**PROCEDURE**

1. In accordance with 935 CMR 500.140(2) *On-premises Verification of Identification*, all individuals will be required to present an acceptable form of identification to IGH Security upon immediate entry into the IGH facility.
  - a) Adult-Use consumers must be 21 years of age or older to gain access to the separate adult-use dispensing area.
  - b) All Registered Qualifying Patients and Personal Caregivers will be required to present their registration card and one other form of acceptable identification to IGH Security to gain access to either the medical or adult-use dispensing areas.
    - i. IGH shall not admit an individual younger than 21 but 18 years of age or older, unless he or she produces an active medical registration card issued by the Commission and one other acceptable form of identification.
    - ii. IGH shall not admit an individual younger than 18, unless he or she is accompanied by a Personal Caregiver and both individuals produce an active medical registration card issued by the Commission and the Personal Caregiver produces one other acceptable form of identification. A Registered Qualifying Patient under the age of 18, accompanied by a Personal Caregiver, does not need a separate means of identification to enter the IGH dispensary.
2. Acceptable forms of identification are limited to the following: valid driver’s license, government-issued identification card, military identification card, and passport.

3. IGH shall not permit entry or dispense marijuana or marijuana products to any individual failing to meet the above requirements.
4. Refer to IGH's Security Plan and Dispensing Product to Medical- and Adult-Use Consumers Policy for more information.

*In compliance with 935 CMR 500.105(1) and 935 CMR 501.105(1), this operating procedure is a part of the single set of written operating procedures applicable to IGH's colocated marijuana operation and complies with both medical-use and adult-use requirements.*

**APPROVED BY:**

---

[Insert Name]

---

Date