



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR281301
Original Issued Date: 07/28/2021
Issued Date: 07/28/2021
Expiration Date: 07/28/2022

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: JimBuddys Rec Shop, Inc.

Phone Number: 413-331-3913
Email Address: jim@jimbuddys.com

Business Address 1: 1269 Memorial Drive
Business City: Chicopee Business State: MA Business Zip Code: 01020

Business Address 2:
Mailing Address 1: 1269 Memorial Drive
Mailing City: Chicopee Mailing State: MA Mailing Zip Code: 01020

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no
Priority Applicant Type: Not a Priority Applicant
Economic Empowerment Applicant Certification Number:
RMD Priority Certification Number:

RMD INFORMATION

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

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 50 Percentage Of Control: 50
Role: Owner / Partner Other Role:

First Name: James **Last Name:** Robinson **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:** 50
Role: Owner / Partner **Other Role:**
First Name: Lisa **Last Name:** Robinson **Suffix:**
Gender: Female **User Defined Gender:**
What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)
Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

No records found

CLOSE ASSOCIATES AND MEMBERS

No records found

CAPITAL RESOURCES - INDIVIDUALS

Individual Contributing Capital 1

First Name: James **Last Name:** **Suffix:**
Robinson
Types of Capital: Monetary/Equity, **Other Type of** **Total Value of the Capital Provided:** **Percentage of Initial Capital:**
Buildings **Capital:** \$103147.01 56
Capital Attestation: Yes

Individual Contributing Capital 2

First Name: Lisa **Last Name:** Robinson **Suffix:**
Types of Capital: Monetary/ **Other Type of** **Total Value of the Capital Provided:** **Percentage of Initial Capital:**
Equity **Capital:** \$82063.26 44
Capital Attestation: Yes

CAPITAL RESOURCES - ENTITIES

No records found

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

No records found

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 1269 Memorial Drive
Establishment Address 2:
Establishment City: Chicopee **Establishment Zip Code:** 01020
Approximate square footage of the establishment: 1200 **How many abutters does this property have?:** 11
Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?: Yes

HOST COMMUNITY INFORMATION

Date generated: 09/24/2021

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	Host Community Agreement Certification Form.pdf	pdf	5c804f838d16491b5c0f98ac	03/06/2019
Community Outreach Meeting Documentation	Community Outreach Meeting Attestation Form.pdf	pdf	5c804fdad7a931124ee049d2	03/06/2019
Community Outreach Meeting Documentation	Attachment A - newspaper tear sheet.pdf	pdf	5c804fe8b411c1126cf04432	03/06/2019
Community Outreach Meeting Documentation	Attachment B - municipal notice.pdf	pdf	5c804ff35fd63c1b24eb69f3	03/06/2019
Community Outreach Meeting Documentation	Attachment C - meeting notice.pdf	pdf	5c8050093779161b2a874a94	03/06/2019
Plan to Remain Compliant with Local Zoning	Host Community Information.pdf	pdf	5ddd8af966a32657cfbdd059	11/26/2019

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

PLAN FOR POSITIVE IMPACT

Plan to Positively Impact Areas of Disproportionate Impact:

Document Category	Document Name	Type	ID	Upload Date
Plan for Positive Impact	Plan to Positively Impact v3.pdf	pdf	5df3d3e8fab70557127edf5b	12/13/2019

ADDITIONAL INFORMATION NOTIFICATION

Notification: I understand

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner Other Role:
 First Name: James Last Name: Robinson Suffix:
 RMD Association: Not associated with an RMD
 Background Question: yes

Individual Background Information 2

Role: Owner / Partner Other Role:
 First Name: Lisa Last Name: Robinson Suffix:
 RMD Association: Not associated with an RMD
 Background Question: yes

ENTITY BACKGROUND CHECK INFORMATION

No records found

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
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Articles of Organization	JimBuddy's Rec Shop, Inc.- Filed Articles.pdf	pdf	5b9fed36d389b22d7bd65744	09/17/2018
Bylaws	By-Laws.pdf	pdf	5cb8bf56e2695d45078d6a91	04/18/2019
Secretary of Commonwealth - Certificate of Good Standing	Cert of Good Standing.pdf	pdf	5ddd96378bdcfd57ae527d1e	11/26/2019

No documents uploaded

Massachusetts Business Identification Number: 001331693

Doing-Business-As Name: JimBuddys Rec Shop

DBA Registration City: Chicopee

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	Business Plan part 1.pdf	pdf	5cb8db7451be434c62d2a23d	04/18/2019
Business Plan	Business Plan part 2.pdf	pdf	5cb8db829b1a9b44dfe4d496	04/18/2019
Plan for Liability Insurance	Plan for obtaining liability insurance.pdf	pdf	5cbde4ae6b08e34c763296b1	04/22/2019
Proposed Timeline	Updated timeline v3.pdf	pdf	5e39defb813339048c3fb308	02/04/2020

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Prevention of diversion	SOP Anti-Diversion Policy.pdf	pdf	5cbe093bdf25934c58f85818	04/22/2019
Storage of marijuana	SOP Storage of Cannabis.pdf	pdf	5cbe095cdf25934c58f8581e	04/22/2019
Inventory procedures	SOP Inventory Controls & Procedure.pdf	pdf	5cbe09825c356a44cb768b1e	04/22/2019
Record Keeping procedures	SOP Record Keeping.pdf	pdf	5cbe0b27e2695d45078d704d	04/22/2019
Maintaining of financial records	SOP Maintenance of Financial Records.pdf	pdf	5cbe0b4b5c356a44cb768b2c	04/22/2019
Plan for obtaining marijuana or marijuana products	Plan for obtaining marijuana or marijuana products.pdf	pdf	5cbe1ab69b1a9b44dfe4da2e	04/22/2019
Transportation of marijuana	SOP Transportation of Cannabis.pdf	pdf	5ddd44d8bdcfd57ae527d51	11/26/2019
Quality control and testing	SOP Quality Control and Testing.pdf	pdf	5ddd452fd468857b99be410	11/26/2019
Restricting Access to age 21 and older	SOP Restricting Access to age 21 and older.pdf	pdf	5ddd4587aad8653363bf127	11/26/2019
Dispensing procedures	SOP Retail Dispensing Operations.pdf	pdf	5ddd45c66a32657cfbdd0c5	11/26/2019
Personnel policies including background checks	SOP Personnel Policies.pdf	pdf	5ddd89074bb15534cd4e87c	11/26/2019
Security plan	SOP Security v4.pdf	pdf	5e39df52fe55e40432f6ef84	02/04/2020
Diversity plan	Diversity Plan v4 2.3.2020.pdf	pdf	5e39df771c3b1d04a32b0dd4	02/04/2020
Qualifications and training	SOP Qualifications and Trainings v2.pdf	pdf	5e39dfa702a6e7045352b469	02/04/2020

MARIJUANA RETAILER SPECIFIC REQUIREMENTS

No documents uploaded

No documents uploaded

ATTESTATIONS

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

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

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

Notification: I Understand

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

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

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

ADDITIONAL INFORMATION NOTIFICATION

Notification: I Understand

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

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

JR



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, JAMES ROBINSON, (insert name) certify as an authorized representative of JIMBUDDYS REC SHOP, INC. (insert name of applicant) that the applicant has executed a host community agreement with CITY CHICOPEE (insert name of host community) pursuant to G.L.c. 94G § 3(d) on 2/20/2019 (insert date).

[Signature]
Signature of Authorized Representative of Applicant

Host Community

I, Richard J. Kos, (insert name) certify that I am the contracting authority or have been duly authorized by the contracting authority for Chicopee (insert name of host community) to certify that the applicant and Chicopee (insert name of host community) has executed a host community agreement pursuant to G.L.c. 94G § 3(d) on 2/22/2019 (insert date).

[Signature]
Signature of Contracting Authority or Authorized Representative of Host Community



Community Outreach Meeting Attestation Form

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

I, James Robinson, (*insert name*) attest as an authorized representative of JimBuddy's Rec Shop (*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 Feb. 21, 2019 (*insert date*).
2. A copy of a notice of the time, place, and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was published in a newspaper of general circulation in the city or town on Feb. 14, 2019 (*insert date*), which was at least seven calendar days prior to the meeting. A copy of the newspaper notice is attached as Attachment A (*please clearly label the newspaper notice in the upper right hand corner as Attachment A and upload it as part of this document*).
3. A copy of the meeting notice was also filed on Feb. 11, 2019 (*insert date*) with the city or town clerk, the planning board, the contracting authority for the municipality, and local licensing authority for the adult use of marijuana, if applicable. A copy of the municipal notice is attached as Attachment B (*please clearly label the municipal notice in the upper right-hand corner as Attachment B and upload it as part of this document*).
4. Notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed on Feb. 11, 2019 (*insert date*), which was at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town. A copy of one of the notices sent to abutters and parties of interest as described in this section is attached as Attachment C (*please clearly label the municipal notice in the upper right hand corner as Attachment C and upload it as part of this document; please only include a copy of one notice and please black out the name and the address of the addressee*).

Estates, Antiques, Autos,
Clean Out Services.
549-8300

Jobs

Jobs - Medical & Dental
Employment Agencies & Services
Job Information
Instruction/Schools
Instruction/Dramatic Arts
Situations Wanted
Wanted - Instruction

Jobs

DRIVER/DELIVERY/HELPER
Pieroways has openings for Driver/Delivery/Helper person. Must have valid drivers lic & Medical cert. Excel earning potential. For appt call Pieroways, 739-1101 betw 10-3

the CLASSIFIEDS
You never know what you'll find inside.

MIT

MIT

The Republican.
413-788-1234
classified@repub.com

- Lawnmower & Snowblower
- Machinery & Tools
- Med. Equipment Sales/Wanted
- Miscellaneous
- Musical Instruments
- Office Equipment
- Pools, Spas & Accessories
- Professional Equipment
- Restaurant Equipment
- Seasonal
- Snowmobiles
- Sports
- Television
- Tickets
- Video
- Vintage Clothing
- Wanted to Buy
- Wood-Burning Stoves

Articles for Sale

10FT FIBERGLASS STEP LADDER \$175; 60lbs Jack Hammer w/bits & Hoses, \$200; (2) Post Hole Diggers, good cond \$20/ea. Call (413)787-9997

5 DRAWER DRESSER, good cond., \$85.00
Call 413-237-7148

7 1/2 FT Fisher Snow Plow blade, \$249./bo.
Call 413-237-7148

8' Snowplow blade, made to fit farm tractor, \$249.
Call 413-237-7148

Bargains Galore

BASEBALL, Football Basketball & Hockey cards, 1950's-present, all 50 to 90% off, unopened boxes \$1.25. I buy cards/all types Memorabilia
413-596-5783

Portable, New \$2400, asking \$750. (413)519-1492

RIDGID tri-pod chain vise SOLD, antique dining room table, made by VT furn, \$175, (413)530-9543

Snowmobile Trailer, \$425.
Call 413-237-7148

Furniture, Etc.

Dining Room Table, 4 chairs, \$100 or B/O, Call 413-734-8315 9am-3pm

Sofa and Loveset, Good condition! Part wood & leather upholstery, \$250 for both. Call 413-592-3512

Jewelry

Marquis wedding & engagement ring, 1.08 total ct diamonds, never worn, \$1000. Call 413-658-8368

Lawnmowers & Snowblowers

Ariens Snowblower runs but needs work. \$225.00/best offer. Call 413-237-7148

Craftsman Snowblower, runs but needs work. \$225. Call 413-237-7148

Husqvarna Snowblower, runs but needs work. \$220. Call 413-237-7148

Meyers 7 1/2 ft snowplow blade, \$450.
Call 413-237-7148

intention to make any such preference, limitation or discrimination. Familial status includes children under the age of 18 living with parents or legal custodians, pregnant women and people securing custody of children under 18.

This newspaper will not knowingly accept any advertising for real estate which is in violation of the law. To report discrimination, call the Office of Fair Housing and Equal Opportunity of the U.S. Department of Housing and Urban Development (HUD) at 1-800-669-9777. The HUD TTY telephone number for the hearing impaired is 212-708-1455.

Apartments/Condos, Unfurnished

0-1-2 BEDROOM AGAWAM FREE HEAT & UTILS No pets. 413-786-6323

Business/Commercial Property

A1 SPACE AVAILABLE 500-8000sf Lt Manuf. W/ase, Office, Art space. Indian Orch Mills 943-3321

Rooms Without Board

BELAIR INN - EFFIC WEEKLY RATES - stove, 60 channel TV, phone, cable, Rte. 5, West Spfid. 413-781-7825

Attachment A JR

Legal Notices

Legal ads can be e-mailed to **classified-legals@repub.com**
For more information call 413-788-1297

Chicopee

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for 2/21/2019 at 10am EST at the Residence Inn by Marriott Springfield Chicopee, located at 500 Memorial Drive, Chicopee, MA 01020. The proposed Marijuana Retailer is anticipated to be located at 1269 Memorial Drive, Chicopee, MA 01020. There will be an opportunity for the public to ask questions.
(February 14)

More Legals on C6



nt in The Republican
slive.com

The Republican is currently seeking part-time

Warehouse Assistants

to join our company, serving in our Westfield and Springfield Distribution Centers.

The Warehouse Assistant supports all operations of the Distribution Center which includes the accurate distribution of newspapers to independent contract carriers, loading and unloading pallets, and maintaining a clean and safe work environment.

You must have the ability to:

- Lift 40-50 lbs
- Read and speak English
- Work well with others as well as independently
- Drive a box truck with Standard transmission

Candidates must have a valid driver's license, good driving record, history of reliable work habits. Forklift certification a must; company will provide if necessary.

Position requires working late night/early morning hours. Candidates must be able to work a flexible schedule four to five days a week, including weekends, averaging 20-25 hours per week.

You can apply in person M-F 9am - 3pm or send a cover letter and resume to humanresources@repub.com

The Republican. | MASS LIVE | **EL PUEBLO Latino**

Attachment B
JR

CITY CLERK'S OFFICE
CITY OF CHICOPEE

2019 FEB 11 A 11:32

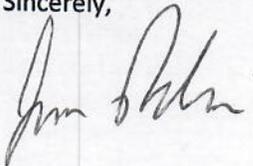
February 8, 2019

City of Chicopee
17 Springfield Street
Clerks Office
Attn: Keith Rattell
Chicopee, MA 01013

Dear Mr. Rattell,

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for February 21, 2019, at 10am EST at the Residence Inn by Marriott Springfield Chicopee, located at 500 Memorial Drive, Chicopee, MA 01020. The proposed Marijuana Retail Establishment is anticipated to be located at 1269 Memorial Drive, Chicopee, MA 01020. There will be an opportunity for the public to ask questions.

Sincerely,



James Robinson
President & CEO

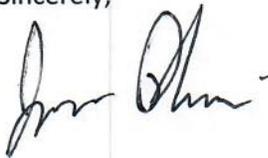
February 8, 2019

~~Chicopee Police Department
143 Church Street
Attn: William Jobb
Chicopee, MA 01020~~

Dear ~~Chief Jobb~~,

Notice is hereby given that a Community Outreach Meeting for a proposed Marijuana Establishment is scheduled for February 21, 2019, at 10am EST at the Residence Inn by Marriott Springfield Chicopee, located at 500 Memorial Drive, Chicopee, MA 01020. The proposed Marijuana Retail Establishment is anticipated to be located at 1269 Memorial Drive, Chicopee, MA 01020. There will be an opportunity for the public to ask questions.

Sincerely,



James Robinson
President & CEO

Host Community Information

(Plan to Remain Compliant with Local Zoning)

This establishment is allowed at this location as a matter of right. The location complies with all siting regulations set forth by the City, Zoning Ordinance 275-72. No variances are required. A Special Permit is required per Zoning Ordinance 275-72 (F).

Local Licensing Requirements:

Special Permit: A Special Permit is granted by the City Council. Part of the Special Permit process is a SPRAC (Site Plan Review Advisory Committee) review which consist of reviews by the Police, Fire, Building and Planning Departments to assist the Council in making their decision. We have applied for a Special Permit under Zoning Ordinance 275-72 (F) under License Group B [Business to Consumer (B2C) Establishments] Zoning Ordinance 275-72 D.(3)(b)

Building Permit: Building Permit applications will be filed by the General Contractor. Electrical permits will be part of this process.

Electrical Permit: Electrical Permit applications will be filed by the Electrical Contractor.

Plumbing permit: None required

Board of Health: None required

Sign Permit: Sign Permit application will be filed by the sign installer.

Certificate of Occupancy: Will be issued by the Building Department upon completion of the project

Plan to Positively Impact “Areas of Disproportionate Impact”

Goals

JimBuddy’s Rec Shop is located in Chicopee, MA and does not fall within one of the areas defined in the Cannabis Control Commission as areas of disproportionate impact, but directly abuts three major cities defined as areas of disproportionate impact, with a total population of over 225,000 residents. These cities are Springfield, Holyoke and West Springfield. The goals of our plan to positively impact areas of disproportionate impact is to:

1. The applicant will hire 10% of its staff that are Massachusetts residents over the age of 21 who reside in areas most effected by past cannabis prohibition, as defined by the CCC; offer employment to only individuals over the age of 21, and
2. Offer, once per calendar year, educational, legal and support services for residents who have been most impacted by the prohibition of cannabis due to past drug convictions, with the goal of helping individuals address legal, societal and educational funding.
3. The applicant will hire 20% of its staff that are Massachusetts residents over the age of 21 who have past drug convictions.

Programs

The programs that JimBuddy’s Rec Shop will participate in are, but not limited to:

1. JimBuddy’s is a member of Cannabis Community Care and Research Network (C3RN), and will work with affiliated programs to distinguish individuals, programs and best practice methods to enable placement, advancement and public awareness.
2. JimBuddy’s will partner with local educational organizations located in areas of disproportionate impact with a focus on providing training, career opportunities and job placement to better identify qualified individuals from these areas. We will only recruit individuals 21 years or older.
 - a. JimBuddy’s will work with local colleges, universities and cannabis programs based within areas of disproportionate impact for recruitment purposes, including but not limited to the Holyoke Community College’s Social Equity Training Program.
3. JimBuddy’s, in conjunction with Evans & Cutler Law firm, will sponsor bi-annual workshops to offer informational and supportive services for individuals as to address expungement programs which will allow them to access better potential career opportunities as well as regaining access to educational scholarships and funding previously prevented by past drug convictions.

Measurements

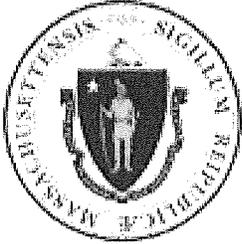
The means by which JimBuddy’s Rec Shop will measure its progress are as follows:

1. Actively working with Positive Impact Plan Partners (i.e. C3RN, Holyoke Community College and NEVA) to create a system to actively monitor and evaluate the following key metrics and data on the success, productivity and compliance to established programs on a bi-annual basis.
 - a. Number of individuals hired, retained and promoted from these programs or who have past drug convictions.
 - b. Number and participation rates of individuals directly referred to these programs by JimBuddy’s; and who have past drug convictions.
 - c. Number of applications received from participants of these programs or who have past drug convictions.
2. JimBuddy’s Compliance Manager will conduct an internal review and evaluation on a quarterly basis of each program and partnership that JimBuddy’s participates with and will track the key metrics of their productivity including but not limited to:
 - a. Employees hired from each separate program; and
 - b. Number of applicants received from each program.
 - c. Number of applicants received that have prior drug convictions.

JimBuddy's will adhere to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding marketing and sponsorship practices of Marijuana Establishments.

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

The progress of this plan and each aspect will be documented for evaluation upon renewal (one year from provisional licensure, and each year there after).



**The Commonwealth of Massachusetts
William Francis Galvin**

Minimum Fee: \$250.00

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

Special Filing Instructions

Articles of Organization

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

Identification Number: 001331693

ARTICLE I

The exact name of the corporation is:

JIMBUDDY'S REC SHOP, INC.

ARTICLE II

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

ARTICLE III

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

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of Shares
		Num of Shares	Total Par Value	
CNP	\$0.00000	275,000	\$0.00	0

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

ARTICLE IV

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

NOT APPLICABLE

ARTICLE V

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

ARTICLE V: RESTRICTIONS ON THE TRANSFER OF STOCK SECTION 1. VOLUNTARY TRANSFER. (A) ANY STOCKHOLDER WHO DESIRES TO TRANSFER ALL OR ANY PART OF THE STOCK OWNED BY HIM/HER WITHOUT CONSIDERATION, SHALL NOTIFY THE CORPORATION IN WRITING, NAMING THE PROPOSED TRANSFEREE AND AN ARBITRATOR. THE CORPORATIO

N MAY WITHIN THIRTY (30) DAYS THEREAFTER GIVE WRITTEN NOTICE TO THE STOCKHOLDER NAMING A SECOND ARBITRATOR. THE TWO ARBITRATORS SO NAMED SHALL WITHIN TEN (10) DAYS NAME A THIRD. IT SHALL THEN BE THE DUTY OF THE ARBITRATORS TO ASCERTAIN BY MAJORITY VOTE WITHIN AN ADDITIONAL THIRTY (30) DAYS THE FAIR MARKET VALUE OF THE STOCK. AFTER THE REPORT OF THE ARBITRATORS AS TO SUCH VALUE, THE BOARD OF DIRECTORS SHALL HAVE AN ADDITIONAL THIRTY (30) DAYS WITHIN WHICH TO PURCHASE SUCH STOCK OR TO DESIGNATE A PERSON OR PERSONS TO PURCHASE THE SAME OR ANY SPECIFIED PART THEREOF AT SUCH VALUE. IN THE EVENT THE CORPORATION DOES NOT EXERCISE ITS RIGHT TO PURCHASE WITHIN SAID THIRTY (30) DAYS, WRITTEN NOTICE OF SUCH DETERMINATION SHALL BE GIVEN TO THE STOCKHOLDER AND THEREAFTER THE STOCKHOLDER MAY DISPOSE OF THE SAME IN THE MANNER SET OUT IN HIS WRITTEN NOTICE WITHIN THIRTY (30) DAYS AFTER THE EXPIRATION OF THE LAST THIRTY (30) DAY PERIOD. IF THE STOCKHOLDER DOES NOT SO DISPOSE OF SUCH STOCK, ALL OF THE RESTRICTIONS IMPOSED HEREIN SHALL APPLY TO ALL OF THE STOCK OWNED BY HIM/HER.

(B) ANY STOCKHOLDER, INCLUDING THE HEIRS, ASSIGNS, EXECUTORS OR ADMINISTRATORS OF A DECEASED STOCKHOLDER, DESIRING TO SELL OR TRANSFER SUCH STOCK OWNED BY HIM/HER OR THEM, SHALL FIRST OFFER IT TO THE CORPORATION THROUGH THE BOARD OF DIRECTORS, IN THE MANNER FOLLOWING: HE/SHE SHALL NOTIFY THE DIRECTORS OF HIS DESIRE TO SELL OR TRANSFER BY NOTICE IN WRITING, WHICH NOTICE SHALL CONTAIN THE PRICE AT WHICH HE/SHE IS WILLING TO SELL OR TRANSFER AND THE NAME OF ONE ARBITRATOR. THE DIRECTORS SHALL WITHIN THIRTY (30) DAYS THEREAFTER EITHER ACCEPT THE OFFER, OR BY NOTICE TO HIM/HER IN WRITING NAME A SECOND ARBITRATOR, AND THESE TWO SHALL NAME A THIRD. IT SHALL THEN BE THE DUTY OF THE ARBITRATORS TO ASCERTAIN THE VALUE OF THE STOCK, AND IF ANY ARBITRATOR SHALL NEGLECT OR REFUSE TO APPEAR AT ANY MEETING APPOINTED BY THE ARBITRATORS, A MAJORITY MAY ACT IN THE ABSENCE OF SUCH ARBITRATOR. AFTER THE ACCEPTANCE OF THE OFFER, OR THE REPORT OF THE ARBITRATORS AS TO THE VALUE OF THE STOCK, THE DIRECTORS SHALL HAVE THIRTY (30) DAYS WITHIN WHICH TO PURCHASE THE SAME AT SUCH VALUATION, BUT IF AT THE EXPIRATION OF THIRTY (30) DAYS, THE CORPORATION SHALL NOT HAVE EXERCISED THE RIGHT SO TO PURCHASE, THE OWNER OF THE STOCK SHALL BE AT LIBERTY TO DISPOSE OF THE SAME IN ANY MANNER HE/SHE MAY SEE FIT. NO SHARES OF STOCK SHALL BE SOLD OR TRANSFERRED ON THE BOOKS OF THE CORPORATION UNTIL THESE PROVISIONS HAVE BEEN COMPLIED WITH, BUT THE BOARD OF DIRECTORS MAY IN ANY PARTICULAR INSTANCE WAIVE THE REQUIREMENT.

SECTION 2. INVOLUNTARY TRANSFER ANY PERSON ACQUIRING ANY SHARES OF STOCK BY THE INSOLVENCY OR BANKRUPTCY OF ANY STOCKHOLDER, BY THE FORECLOSURE OF ANY PLEDGE OR HYPOTHECATION, OR BY ANY OTHER INVOLUNTARY TRANSFER OR ASSIGNMENT, OR BY DEATH, OR OTHERWISE BY PROCESS OF LAW, BEFORE BEING ENTITLED TO EXERCISE ANY RIGHTS AS A HOLDER OF SUCH STOCK OF THE CORPORATION, SHALL OFFER IN WRITING ALL OF SUCH ACQUIRED SHARES TO THE CORPORATION FOR PURCHASE BY IT AND DELIVER TO THE CORPORATION TOGETHER WITH SUCH OFFER, (1) THE CERTIFICATE OR CERTIFICATES REPRESENTING ALL OF SUCH SHARES OR STOCK (2) PROPER PROOF OR AUTHENTICATION OF SUCH PERSON'S RIGHT TO ACQUIRE SUCH SHARES AND TO TRANSFER THE SAME, AND (3) A STOCK POWER OR POWERS DULY EXECUTED IN BLANK BY SUCH PERSON. SUCH OFFER SHALL BE MADE WITHIN THIRTY (30) DAYS OF SUCH INVOLUNTARY TRANSFER AND SHALL NAME ONE ARBITRATOR. THE CORPORATION MAY WITHIN THIRTY (30) DAYS THEREAFTER GIVE WRITTEN NOTICE TO THE STOCKHOLDER NAMING A SECOND ARBITRATOR. THE TWO ARBITRATORS SO NAMED SHALL WITHIN TEN (10) DAYS NAME A THIRD. IT SHALL THEN BE THE DUTY OF THE ARBITRATORS TO ASCERTAIN BY MAJORITY VOTE WITHIN AN ADDITIONAL THIRTY (30) DAYS THE FAIR MARKET VALUE OF THE STOCK. AFTER THE REPORT OF THE ARBITRATORS AS TO SUCH VALUE, THE BOARD OF DIRECTORS SHALL HAVE AN ADDITIONAL THIRTY (30) DAYS WITHIN WHICH TO PURCHASE SUCH STOCK OR TO DESIGNATE IN WRITING A PERSON OR PERSONS TO PURCHASE THE SAME OR ANY SPECIFIED PART THEREOF AT SUCH VALUE. IN THE EVENT THAT THE CORPORATION DOES NOT ELECT TO EXERC

ISE ITS OPTION HEREUNDER, THE SHARES OF STOCK SO ACQUIRED SHALL BE TRANSFERRED ON THE BOOKS OF THE CORPORATION INTO THE NAME OF THE PERSON ACQUIRING THE SAME AND SUCH STOCK SHALL THEREAFTER BE SUBJECT TO ALL THE RESTRICTIONS IMPOSED BY THIS ARTICLE. SECTION 3. MISCELLANEOUS. NO SHARES OF STOCK SHALL BE SOLD OR TRANSFERRED ON THE BOOKS OF THE CORPORATION UNTIL THE PROVISIONS CONTAINED HEREIN HAVE BEEN COMPLIED WITH, BUT THE BOARD OF DIRECTORS MAY IN ANY PARTICULAR INSTANCE WAIVE THESE REQUIREMENTS. A PLEDGE OR HYPOTHECATION SHALL NOT BE SUBJECT TO THIS RESTRICTION, AND PRIOR TO FORECLOSURE NO TRANSFER OF THE SHARES PLEDGED OR HYPOTHECATED SHALL BE MADE BY THE CORPORATION ON ITS BOOKS (EXCEPT TO ANY EXTENT REQUIRED BY LAW). IF THE PLEDGE OR HYPOTHECATION SHALL BE FORECLOSED, ANY SUCH TRANSFER SHALL BE SUBJECT TO THIS RESTRICTION. THE FOLLOWING STATEMENT SHALL BE LEGIBLY STAMPED OR ENDORSED UPON EACH CERTIFICATE OF STOCK OF THE CORPORATION NOW OWNED OR HEREAFTER ACQUIRED: THIS CERTIFICATE IS SUBJECT TO AND TRANSFERABLE ON THE BOOKS OF THE CORPORATION ONLY UPON COMPLIANCE WITH THE PROVISIONS OF THE STOCK RESTRICTION PROVISIONS APPLICABLE THERETO, A COPY OF WHICH WILL BE SUPPLIED TO THE HOLDER OF THIS CERTIFICATE WITHOUT CHARGE UPON WRITTEN REQUEST TO THE CLERK OF THE CORPORATION. EACH STOCKHOLDER SHALL SURRENDER TO THE CORPORATION ALL OF THE CERTIFICATES OF STOCK IN THE CORPORATION NOW OWNED OR HEREAFTER ACQUIRED BY HIM/HER AND THE CORPORATION SHALL INSCRIBE THEREON THE LEGEND SET FORTH IN THE PRECEDING SENTENCE AND RETURN SAID CERTIFICATES TO THE STOCKHOLDER.

ARTICLE VI

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

(A) THE DIRECTORS MAY MAKE, AMEND OR REPEAL THE BY-LAWS IN WHOLE OR IN PART, EXCEPT WITH RESPECT TO ANY PROVISIONS THEREOF WHICH BY LAW THE BY-LAWS REQUIRE ACTION BY THE STOCKHOLDER. (B) MEETINGS OF THE STOCKHOLDERS MAY BE HELD ANYWHERE IN THE UNITED STATES. (C) THE CORPORATION MAY BE A PARTNER IN ANY BUSINESS ENTERPRISE IT WOULD HAVE THE POWER TO CONDUCT ITSELF.

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

ARTICLE VII

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

Later Effective Date: Time:

ARTICLE VIII

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

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

Name: JAMES M. ROBINSON
No. and Street: 30 VADNAIS STREET
City or Town: CHICOPEE State: MA Zip: 01020 Country: USA

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

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
PRESIDENT	JAMES M. ROBINSON	30 VADNAIS STREET CHICOPEE, MA 01020 USA
TREASURER	LISA M. ROBINSON	30 VADNAIS STREET CHICOPEE, MA 01020 USA
SECRETARY	JAMES M. ROBINSON	30 VADNAIS STREET CHICOPEE, MA 01020 USA
DIRECTOR	JAMES M. ROBINSON	30 VADNAIS STREET CHICOPEE, MA 01020 USA
DIRECTOR	LISA M. ROBINSON	30 VADNAIS STREET CHICOPEE, MA 01020 USA

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

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

GENERAL RETAIL SALES.

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

No. and Street: 1269 MEMORIAL DRIVE
City or Town: CHICOPEE State: MA Zip: 01020 Country: USA

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

No. and Street: 1269 MEMORIAL DRIVE
City or Town: CHICOPEE State: MA Zip: 01020 Country: USA

which is

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

Signed this 13 Day of June, 2018 at 10:52:53 AM by the incorporator(s). (If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)

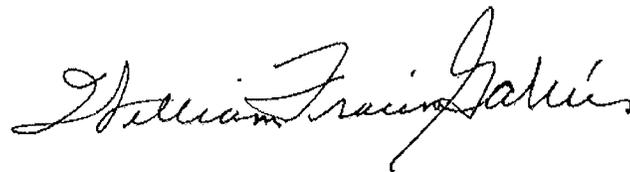
JAMES M. ROBINSON

THE COMMONWEALTH OF MASSACHUSETTS

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

deemed to have been filed with me on:

June 13, 2018 10:52 AM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

BY-LAWS

of

JimBuddy's Rec Shop, Inc.

ARTICLE I

Articles of Organization

The name and purposes of the corporation shall be as set forth in the Articles of Organization. These By-Laws, the powers of the corporation and its Directors and stockholders, and all matters concerning the conduct and regulation of the business of the corporation, shall be subject to such provisions in regard thereto, if any, as are set forth in the Articles of Organization. All references in these By-Laws to the Articles of Organization shall be construed to mean the Articles of Organization of the corporation as from time to time amended or restated.

ARTICLE II

Fiscal Year

Except as from time to time otherwise determined by the Director(s), the fiscal year of the corporation shall end each year on December 31st.

ARTICLE III

Meetings of Stockholders

Section I. Annual Meetings.

The annual meeting of the stockholders shall be held on the second Tuesday in March of each year (or if it be a legal holiday in the place where the meeting is to be held, on the next succeeding full business day) at 10:00 o'clock A.M. unless a different hour is fixed by the Board of Directors or the President. The purposes for which the annual meeting is to be held, in addition to those prescribed by law, by the Articles of Organization or by these By-Laws, may be

specified by the Board of Directors of the President. If no annual meeting has been held on the date fixed above, a special meeting in lieu thereof may be held and such special meeting shall have for the purposes of these By-Laws or otherwise all the force effect of an annual meeting.

Section 2. Special Meetings.

A special meeting of the stockholders may be called at any time by the president, or by majority of the Directors acting by vote or by written instrument or instruments signed by them. A special meeting of the stockholders shall be called by the Secretary, or in case of the death, absence, incapacity or refusal of the Secretary, by any other officer, upon written application of one or more stockholders who hold at least one-tenth part in interest of the stock entitled to vote at the meeting. Such call shall state the time, place, and purposes of the meeting.

Section 3. Place of Meetings.

All meetings of the stockholders shall be held at the principal office of the corporation in Massachusetts, unless a different place within Massachusetts or, if permitted by the Articles of Organization, elsewhere within the United States as designated by the President, or by a majority of the Directors acting by vote or by written instrument or instruments signed by them. Any adjourned session of any meeting of the stockholders shall be held at such place within Massachusetts or, if permitted by the Articles of Organization, elsewhere within the United States as is designated in the vote of adjournment.

Section 4. Notice of Meetings.

A written notice of the place, date and hour of all meetings of stockholders stating the purposes of the meeting shall be given at least seven days before the meeting to each stockholder entitled to vote thereat and to each stockholder who is otherwise entitled by law of by the Articles of Organization to such notice, by leaving such notice with him or at his residence or

usual place of business, or by mailing it, postage prepaid, and addressed to such stockholder at his address as it appears in the records of the corporation. Such notice shall be given by the Secretary, or in case of the death, absence, incapacity or refusal of the Secretary, by any other officer or by a person designated either by the Secretary, by the person or persons calling the meeting or by the Board of Directors. Whenever notice of a meeting is required to be given a stockholder under any provision of law, of the Articles of Organization, or of these By-Laws, a written waiver thereof, executed before or after the meeting by such stockholder or his attorney thereunto authorized, and filed with the records of the meeting, shall be deemed equivalent to such notice.

Section 5. Quorum.

At any meeting of the stockholders, a quorum shall consist of a majority in interest of all stock issued and outstanding and entitled to vote at the meeting; except that if two or more classes or series, then in the case of each such classes or series a quorum for that matter shall consist of a majority in interest of all stock of that class or series issued and outstanding; and except when a larger quorum is required by law, by the Articles of Organization or by these By-Laws. Stock owned directly or indirectly by the corporation, if any, shall not be deemed outstanding for this purpose. Any meeting may be adjourned from time to time by a majority of the votes properly cast upon the question, whether or not a quorum is present, and the meeting may be held as adjourned without further notice, providing that a quorum is present at said adjourned time.

Section 6. Action by Vote.

When a quorum is present at any meeting, a plurality of the votes properly cast for election to any office shall elect to such office, and a majority of the vote properly cast upon any

question other than an election to an office shall decide the question, except when a larger vote is required by law, by the Articles of Organization or by these By-Laws. No ballot shall be required for any election unless requested by a stockholder present or represented at the meeting and entitled to vote in the election.

Section 7. Voting.

Stockholders entitled to vote shall have one vote for each share of stock entitled to vote held by them or recorded according to the records of the corporation and a proportionate vote for a fractional share, unless otherwise provided by the Articles of Organization. The corporation shall not, directly or indirectly, vote any share of its own stock.

Section 8. Action by Consent.

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.

Section 9. Proxies.

Stockholders entitled to vote may vote either in person or by proxy in writing dated not more than six months before the meeting named therein, which proxies shall be filed with the Secretary or the person responsible to record the proceedings of the meeting before being voted. Unless otherwise specifically limited by their terms, such proxies shall entitle the holders thereof to vote at any adjournment of such meeting but shall not be valid after the final adjournment of such meeting. A proxy 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 corporation 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 and the burden of proving invalidity shall rest on the challenger.

ARTICLE IV

Directors

Section 1. Powers.

The business of the corporation shall be managed by a Board of Directors who shall have and may exercise all the powers of the corporation except as otherwise reserved to the stockholders by law, by the Articles of Organization or by these By-Laws. In the event of a vacancy in the Board of Directors, the remaining Directors, except as otherwise provided by law, may exercise the powers of the full Board until the vacancy is filled.

Section 2. Enumeration, Election and Term of Office.

The Board of Directors shall consist of not less than one Director, until such time as the stockholders agree unanimously, or until the death or disability of a Director. The number of the Directors shall be as determined from time to time by the stockholders and may be enlarged by vote of a majority of the Directors then in office. The Directors shall be chosen at the annual meeting of the stockholders by such stockholders as have the right to vote thereon, and each shall hold office until the next annual election of Directors and until his successor is chosen and qualified or until he sooner dies, resigns, is removed or becomes disqualified. No Director need be a stockholder.

Section 3. Regular Meetings.

Regular meetings of the Board of Directors may be held at such times and places within or without the Commonwealth of Massachusetts as the Board of Directors may fix from time to time and, when so fixed, no notice thereof need be given, provided that any Director who is

absent when such times and places are fixed shall be given notice of the fixing of such times and places. The first meeting of the Board of Directors following the annual meeting of the stockholders may be held without notice immediately after and at the same place as the annual meeting of the stockholders or the special meeting held in lieu thereof. If in any year a meeting of the Board of Directors is not held at such time and place, any action to be taken may be taken at any later meeting of the Board of Directors with the same force and effect as if held or transacted at such meeting.

Section 4. Special Meetings.

Special meetings of the Directors may be held at any time and at any place designated in the call of the meeting, when called by the President or the Treasurer or by two or more Directors, reasonable notice thereof being given to each director by the Secretary or an Assistant Secretary, or, if there be none by the Secretary or an Assistant Secretary, by the officer or one of the Directors calling the meeting.

Section 5. Notice.

It shall be reasonable and sufficient notice to a Director to send notice by mail at least forty-eight hours or by telegram at least twenty-four hours before the meeting addressed to him at his usual or last known business or residence address or to give notice to him in person or by telephone at least twenty-four hours before the meeting. Notice of a 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. Neither notice of a meeting nor a waiver of a notice need specify the purposes of the meeting.

Section 6. Quorum.

At any meeting of the Directors, a quorum for any election or for the consideration of any question shall consist of all of the Directors then in office. Whether or not a quorum is present any meeting may be adjourned from time to time by a majority of the votes properly cast upon the question, and the meeting may be held as adjourned without further notice. When a quorum is present at any meeting, the votes of a majority of the Directors present shall be requisite and sufficient for election to any office and shall decide any question brought before such meeting, except in any case where a larger vote is required by law, by the Articles of Organization or by these By-Laws.

Section 7. Action by Consent.

Any action required or permitted to be taken at any meeting of the Directors may be taken without a meeting if all the Directors consent to the action in writing and the written consents are filed with the records of the meetings of the Directors. Such consent shall be treated for all purposes as a vote of the Directors at a meeting.

Section 8. Committees.

The Board of Directors, by vote of a majority of the Directors then in office, may elect from its number an Executive Committee or other committees and may delegate thereto some or all of its powers except those which by law, by the Articles of Organization, or by these By-Laws may not be delegated. Except as the Board of Directors may otherwise determine, any such committee may make rules for the conduct of its business, but unless otherwise provided by the Board of Directors or in such rules, its business shall be conducted so far as possible in the same manner as is provided by these By-Laws for the Board of Directors. All members of such committees shall hold such offices at the pleasure of the Board of Directors. The Board of

Directors may abolish any such committee at any time. Any committee to which the Board of Directors delegates any of its powers or duties shall keep records of its meetings and shall upon request report its action to the Board of Directors. The Board of Directors shall have power to rescind any action of any committee, but no such rescission shall have retroactive effect.

ARTICLE V

Officers and Agents

Section 1. Enumeration; Qualification.

The officers of the corporation shall be a President, Treasurer, a Secretary, and such other officers, if any, as the incorporators at the initial meeting, or the Directors from time to time, may in their discretion elect or appoint. The corporation may also have such agents, if any, as the incorporators at their initial meeting, or the Directors from time to time, may in their discretion appoint. Any officer may be, but none need be a Director or stockholder. The Secretary shall be a resident of Massachusetts unless the corporation has a resident agent appointed for the purpose of service of process. Any two or more offices may be held by the same person. Any officer may be required by the Directors to give bond for the faithful performance of his duties to the corporation in such amounts and with such sureties as the Directors may determine. The premiums for such bonds may be paid by the corporation.

Section 2. Powers.

Subject to law, to the Articles of Organization and to the other provisions of these By-Laws, each officer shall have, in addition to the duties and powers herein set forth, such duties and powers as the Directors may from time to time designate.

Section 3. Election.

The President, the Treasurer and the Secretary shall be elected annually by the Directors at their first meeting following the annual meeting of the stockholders. Other officers, if any, may be elected or appointed by the Board of Directors at said meeting or at any other time.

Section 4. Tenure.

Except as otherwise provided by law or by the Articles of Organization or by these By-Laws, the President, the Treasurer and the Secretary shall hold office until the first meeting of the Directors following the next annual meeting of the stockholders and until their respective successors are chosen and qualified, and each other officer shall hold office until the first meeting of the Directors following the next annual meeting of the stockholders and until their respective successors are chosen and qualified, unless a different period shall have been specified by the terms of his election or appointment, or in each case until he sooner dies, resigns, is removed or becomes disqualified. Each agent shall retain his authority at the pleasure of the Directors.

Section 5. President and Vice-Presidents.

The President shall be the chief executive officer of the corporation and shall, subject to the direction of the Board of Directors, have general supervision and control of its business. Unless otherwise provided by the Board of Directors, he shall preside, when present, at all meetings of stockholders and of the Board of Directors.

Any Vice-President shall have such powers and shall perform such duties as the Board of Directors may from time to time designate.

Section 6. Treasurer and Assistant Treasurer.

The Treasurer shall, subject to the direction of the Board of Directors, have general charge of the financial affairs of the corporation and shall cause to be kept accurate books of account. He shall have custody of all funds, securities, and valuable documents of the corporation, except as the Board of Directors may otherwise provide.

Any Assistant Treasurer shall have such powers and perform such duties as the Board of Directors may from time to time designate.

Section 7. Secretary and Assistant Secretaries.

The Secretary shall keep a record of the meetings of stockholders and directors. In the absence of the Secretary from any meeting of stockholders or directors, an Assistant Secretary designated by the person presiding at the meeting, shall perform the duties of the Secretary.

ARTICLE VI

Resignations, Removals and Vacancies

Section 1. Resignations.

Any Director or officer may resign at any time by delivering his resignation in writing to the President or the Secretary or to a meeting of the Directors. Such resignation shall take effect at such time as is specified therein, or if no such time is so specified, then upon delivery thereof.

Section 2. Removals.

Directors, including Directors elected by the Directors to fill vacancies in the Board, may be removed with or without assignment of cause by unanimous vote of the holders of the shares entitled to vote in the election of Directors, provided that the Directors of a class elected by a particular class of stockholders may be removed only by the vote of the holders of a majority of

the shares of the particular class of stockholders entitled to vote for the election of such Directors.

The Directors may by vote of a majority of the Directors then in office remove any Director for cause.

The Director may remove any officer from office with or without assignment of cause by vote of a majority of the Directors then in office.

If cause is assigned for removal of any Director or officer such Director or officer may be removed only after a reasonable notice and opportunity to be heard before the body proposed to remove him.

The Directors may by unanimous vote terminate or modify the authority of any agent or employee.

Except as the Directors may otherwise determine, no Director or officer who resigns or is removed shall have any right to any compensation as such Director or officer for any period following his resignation or removal, or any right to damages on account of such removal whether his compensation be by the month or by the year or otherwise, provided, however, that the foregoing provisions shall not prevent such Director or officer from obtaining damages for breach of any contract of employment legally binding upon the corporation.

Section 3. Vacancies.

Any vacancy in the Board of Directors, including a vacancy resulting from an enlargement of the Board, may be filled by vote of a majority of the Directors then in office or, in the absence of such election by the Directors, by the stockholders at a meeting called for the purpose; provided, however, that any vacancy resulting from action by the stockholder may be filled by the stockholder at the same meeting at which such action was taken by them.

If the office of any officer becomes vacant, the Directors may elect or appoint a successor by unanimous vote.

Each such successor shall hold office for the unexpired term of his predecessor and until his successor shall be elected or appointed and qualified, or until he sooner dies, resigns, is removed or becomes disqualified.

ARTICLE VII

Indemnification of Directors and Others

The corporation shall, to the extent legally permissible, indemnify any person serving or who has served as a Director or officer of the corporation, or at its request as a Director, Trustee, Officer, Employee or other Agent of any organization in which the corporation owns shares or of which it is a creditor 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 him in connection with the defense or disposition of any action, suit or other proceeding, whether civil or criminal, in which he may be involved or with which he may be threatened, while serving or thereafter, by reason of his being or having been such a Director, Officer, Trustee, Employee or Agent, except with respect to any matter as to which he shall have been adjudicated in any proceeding not to have acted in good faith in the reasonable belief that his action was in the best interests of the corporation; provided, however, that as to any matter disposed of by a compromise payment by such Director, Officer, Trustee, Employee or Agent, pursuant to a consent decree or otherwise, no indemnification either for said payment or for any other expenses shall be provided unless:

- (a) Such compromise shall be approved as in the best interests of the corporation, after notice that it involves such indemnification:
 - (i) by a disinterested majority of the Directors then in office; or

- (ii) by the holders of a majority of the outstanding stock at the time entitled to vote for Directors, voting as a single class, exclusive of any stock owned by any interested Director or officer; or
- (b) In the absence of action by disinterested directors or stockholders, there has been obtained at the request of a majority of the Directors then in office an opinion in writing of independent legal counsel to the effect that such Director or officer appears to have acted in good faith in the reasonable belief that his action was in the best interests of the corporation.

Expenses including counsel fees, reasonably incurred by any such Director, Officer, Trustee, Employee or Agent in connection with the defense or disposition of any such action, suit or other proceeding may be paid from time to time by the corporation in advance of the final disposition thereof upon receipt of an undertaking by such individual to repay the amounts so paid to the corporation if it is ultimately determined that indemnification for such expenses is not authorized under this section. The right of indemnification hereby provided shall not be exclusive of or affect any other rights to which any such Director, Officer, Trustee, Employee or Agent may be entitled. Nothing contained in this Article shall affect any rights to indemnification to which corporate personnel other than such Directors, Officers, Trustees, Employees or Agents may be entitled by contract or otherwise under law. As used in this Article, the terms "Director", "Officer", "Trustee", "Employee" and "Agent" include their respective heirs, executors and administrators, and an "interested" Director, Officer, Trustee, Employee or Agent is one against whom in such capacity the proceedings in question or other proceedings on the same or similar grounds is then pending.

ARTICLE VIII

Stock

Section 1. Stock Authorized.

The total number of shares and the par value, if any, of each class of stock which the corporation is authorized to issue, and if more than one class is authorized, a description of each class with the preferences, voting powers, qualifications and special and relative rights and privileges as to each class and any series thereof, shall be as stated in the Articles of Organization.

Section 2. Issue of Authorized Unissued Capital Stock.

Any unissued capital stock from time to time authorized under the Articles of Organization may be issued by vote of the Directors. No such stock shall be issued unless the cash, so far as due, or the property, services or expenses for which it was authorized to be issued, has been actually received or incurred by, or conveyed or rendered to, the corporation, or is in its possession as surplus.

Section 3. Certificates of Stock.

Each stockholder shall be entitled to a certificate in form selected by the Board of Directors stating the number and the class and the designation of the series, if any, of the shares held by him. Such signatures may be facsimiles if the certificate is signed by a transfer agent, or by a registrar, other than a Director, officer or employee of the corporation.

Every certificate for shares of stock subject to any restriction or transfer pursuant to the Articles of Organization, these By-Laws, or any agreement to which the corporation is a party shall have the restriction noted conspicuously on the certificate and shall also set forth on the face or back either the full text of the restriction or a statement of the existence of such restriction

and a statement that the corporation will furnish a copy to the holder of such certificate upon written request and without charge. Every certificate issued when the corporation is authorized to issue more than one class or series of stock shall set forth on its face or back either the full text or the preferences, voting powers, qualifications and rights, and a statement that the corporation will furnish a copy thereof to the holder of such certificate upon written request and without charge.

Section 4. Transfers.

Subject to the restrictions, if any, imposed by the Articles of Organization, these By-Laws or any agreement to which the corporation is a party, shares of stock shall be transferred on the books of the corporation only by the surrender to the corporation or its transfer agent of the certificate representing such shares properly endorsed or accompanied by a written assignment of such shares or by a written power of attorney to sell, assign, or transfer such shares, properly executed, with necessary transfer stamps affixed, and with such proof that the endorsement, assignment or power of attorney is genuine and effective as the corporation or its transfer agent may reasonably require. Except as may be otherwise required by law, 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, including the payment of dividends and the right to vote with respect thereto, regardless of any transfer, pledge or other disposition of such stock, until the shares have been transferred on the books of the corporation in accordance with the requirements of these By-Laws. It shall be the duty of each stockholder to notify the corporation of his post office address.

Section 5. Lost, Mutilated, or Destroyed Certificates.

Except as otherwise provided by law, the Board of Directors may determine the conditions upon which a new certificate of stock may be issued in place of any certificate alleged to have been lost, mutilated or destroyed. It may, in its discretion, require the owner of a lost, mutilated or destroyed certificate, or his legal representative, to give a bond, sufficient in its opinion, with or without surety, to indemnify the corporation against any loss or claim which may arise by reason of the issue of a certificate in place of such lost, mutilated or destroyed stock certificate.

Section 6. Transfer Agent and Registrar.

The Board of Directors may appoint a transfer agent or a registrar or both for its capital stock or any class or series thereof and require all certificates for such stock to bear the signature or facsimile thereof of any such transfer agent or registrar.

Section 7. Setting Record Date and Closing Transfer Records.

The Board of Directors may fix in advance a time not more than sixty days before (i) the date of any meeting of the stockholders or (ii) the date for the payment of any dividend or the making of any distribution to stockholders or (iii) the last day on which the consent or dissent of stockholders may be effectively expressed for any purpose, as the record date for determining the stockholders having the right to notice and to vote at such meeting, or the right to receive such dividend or distribution, or the right to give such consent or dissent. If a record date is set, only stockholders of record on the date shall have such right notwithstanding any transfer of stock on the records of the corporation after the record date. Without fixing such record date, the Board of Directors may close the transfer records of the corporation for all or any part of such sixty day period.

If no record date is fixed and the transfer books are not closed, then 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 preceding the day on which notice is given, and 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.

ARTICLE IX

Miscellaneous Provisions

Section 1. Execution of Papers.

All deeds, leases, transfers, contracts, bonds, notes, releases, checks, drafts and other obligations authorized to be executed on behalf of the corporation shall be signed by the President or the Treasurer except as the Directors may generally or in particular cases otherwise determine.

Section 2. Voting of Securities.

Except as the Directors may generally or in particular cases otherwise specify, the President or the Treasurer may on behalf of the corporation vote or take any other action with respect to shares of stock or beneficial interest of any other corporation, or of any association, trust or firm, of which any securities are held by this corporation, and may appoint any person or persons to act as proxy or attorney-in-fact for the corporation, with or without power of substitution, at any meeting thereof.

Section 3. Corporate Seal.

The seal of the corporation shall be a circular die with the name of the corporation, the word "Massachusetts" and the year of its incorporation cut or engraved thereon, or shall be in such other form as the Board of Directors may from time to time determine.

Section 4. Corporate Records.

The original, or attested copies, of the Articles of Organization, By-Laws and records of all meetings of the Incorporators and stockholders, and the stock and transfer records, which shall contain the names of all stockholders and the record address and the amount of stock held by each, shall be kept in Massachusetts at the principal office of the corporation, or at an office of its transfer agent or of its Secretary or of its Resident Agent. Said copies and records need not all be kept in the same office. They shall be available at all reasonable times to the inspection of any stockholder for any proper purpose but not to secure a list of stockholders for the purpose of selling said list or copies thereto or of using the same for a purpose other than in the interest of the applicant, as a stockholder, relative to the affairs of the corporation.

Section 5. Evidence of Authority.

A certificate by the Secretary or Assistant Secretary as to any matter relative to the Articles of Organization, By-Laws, records, Board of Directors, or any committee of the Board of Directors, or stock and transfer records or as to any action taken by any person or persons as an officer or agent of the corporation, shall as to all persons who rely thereon in good faith be conclusive evidence of the matters so certified.

ARTICLE X

Amendments

These By-Laws may be amended or repealed in whole or in part by the unanimous vote of the holders of the shares of each class of the capital stock at the time outstanding and entitled to vote at any annual or special meeting of stockholders, provided that notice of the substance of the proposed amendment is stated in the notice of such meeting. If authorized by the Articles of Organization, the Directors by unanimous vote may make, amend or repeal the By-Laws, in

whole or in part, except with respect to any provision thereof which by law, the Articles of Organization or the By-Laws requires action by the stockholders. Not later than the time of giving notice of the meeting of stockholders next following the making, amending or repealing by the Directors of any By-Law, notice thereof stating the substance of such change shall be given to all stockholders entitled to vote on amending the By-Laws. No change in the date fixed in these By-Laws for the annual meeting of stockholders may be made within sixty days before the date fixed in these By-Laws, and in case of any change in such date, notice thereof shall be given to each stockholder in person or by letter mailed to his last known post office address at least twenty days before the new date fixed for such meeting.

Any By-Law adopted, amended or repealed by the Directors may be repealed, amended or reinstated by the stockholders entitled to vote on amending the By-Laws.

ARTICLE XI

Repayment Arrangement

Any payment paid to an officer of the corporation such as a salary, commission, bonus, interest, or rent, for entertainment expense incurred by him, which shall be disallowed in whole or in part as a deductible expense by the Internal Revenue Service, shall be reimbursed by such officer to the corporation to the full extent of such disallowance. It shall be the duty of the Directors, as a Board, to enforce payment of each such amount disallowed. In lieu of payment by the officer, subject to the determination of the Directors, proportionate amounts may be withheld from his or her future compensation payments, until the amount owed to the corporation has been recovered.



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



LISA ROBINSON
JIMBUDDY'S REC SHOP INC
1269 MEMORIAL DR
CHICOPEE MA 01020-3974

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Why did I receive this notice?

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

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

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

What if I have questions?

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

Visit us online!

Visit mass.gov/dor 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

BUSINESS PLAN



James Robinson, Owner

Created on August 1, 2018

1. EXECUTIVE SUMMARY

1.1 Product

JimBuddy's Rec Shop will dispense cannabis and cannabis infused products to adult customers that are at least 21 years old with valid government issued identification. Customer service and education are our top priorities. We are committed to providing a wide variety of the highest quality product available, sourced from State licensed cultivators and manufacturers. Private customer consultations are available upon request. Pricing will be clearly posted. Educational material regarding safety, responsible consumption, abuse, and diversion to minors will be provided to each guest.

1.2 Customers

Cannabis and the cannabis culture has been, for the past many years, in the midst of a major brand overhaul. The frequency and prevalence of it as seen throughout the media is growing exponentially every day. The U.S. Cannabis Industry is forecasted to jump from \$24 Billion to \$44 Billion annually into the country's economy by 2020.

Our target customers will be consumers 21-85 years old, with the average of 37 years old. The average customer spends \$33 per trip to the dispensary. Our customers, ranging from athletes to the elderly, will use cannabis to target relief from pain, as an opioid alternative, and for enjoyment purposes. We will target customers that do not grow their own product, are looking for lab tested products, variety, education and information. Customers will range from first time consumers to connoisseurs.

1.3 What Drives Us

Our goal as a dispensary is to deliver superior customer service, while educating customers. We will continue to introduce new innovative delivery mediums to our

customers as this industry continues to rapidly evolve. The retail shop will have a design aesthetic that appeals to customers. We will create full and part-time jobs and opportunities. Donations will be made to local charities. Our team will attend trade shows and seminars to learn about the newest products available to the market. All employees will receive on-going training.

2. COMPANY DESCRIPTION

2.1 Mission Statement

JimBuddy's aims to achieve strong bonds with the local community and organizations in an effort to form a long lasting relationship as a reputable, respectable and contributing business to the citizens of Chicopee and surrounding areas. Our knowledgeable passionate staff will be prepared to offer each client the time and assistance needed when making a purchase, so they are educated on how to consume safely and responsibly, the benefits of the products they are purchasing, as well as the side effects. We hope to help remove the negative stigma around cannabis by highlighting the many beneficial uses and presenting it in a professional atmosphere.

2.2 Principal Members

James Robinson - President

Lisa Robinson - Director of Operations

2.3 Legal Structure

JimBuddy's Rec. Shop is an S Corporation, incorporated in Chicopee, Massachusetts. The EIN is 83-0904086.

3. MARKET RESEARCH

3.1 Industry

Currently, recreational sales are legal in Alaska, California, Colorado, Massachusetts, Nevada, Oregon and Washington State. In 2017, the legal marijuana industry hit \$10 billion in nationwide sales. By 2021, analysts predict it will hit \$24.5 billion. The cannabis industry employs between 125,000 to 160,000 full-time workers. It's expected to add another 340,000 full time jobs by 2022, reflecting an estimated growth of 21 percent per year. Conservative estimates show more than \$1 billion dollars in wholesale, excise, and cannabis-specific sales taxes were taken into state treasuries during 2016. That number is forecast to grow to nearly \$2.8 billion by 2021. With additional state and local general sales taxes, that 2021 figure could be between \$4 billion and \$4.7 billion. The total economic output from legal cannabis will grow 150% from \$16 billion in 2017 to \$40 billion by 2021.

3.2 Customers

Most of our customers will live in the surrounding areas. Customers will range between 21-85 years old. The average customer will spend \$700 per year on cannabis. Research shows that more men purchase cannabis than women.

As the development of products grows and consumers become more educated, cannabis brands will pursue consumers interested in specific effects, rather than just celebrating cannabis in general.

There are many different types of consumers. Customers will be looking for pain relief, injury recovery, or as an opioid alternative. Some customers will want cannabis to help them with creativity or for personal enjoyment. In addition, there will be cannabis enthusiasts, looking for the highest quality products available.

There will be a surge of new types of customers. These will include Baby Boomers who want alternatives to alcohol and pharmaceutical drugs, and the inexperienced customer looking for low-dose products. Product development is exploding to the

benefit of the consumer.

Cannabis tourism is taking over the cannabis industry. Since Massachusetts legalized recreational cannabis in November 2016, the State has become one of the top marijuana destinations for cannabis enthusiasts and experienced smokers. Internet searches for marijuana information and laws in the state of Massachusetts rose after the election by over 1000%. This is a hugely significant rise, and those in and around the state want to know when they will be able to access high quality marijuana products.

3.3 Competitors

JimBuddy's will be competing with the black market, big businesses and other local operating dispensaries. Education and quality control is the key to encouraging customers to shun the black market. Our vendors will go through a vetting process. We will be able to offer a variety of product from various licensed vendors. Our pricing will be competitive.

JimBuddy's will show a level of transparency. JimBuddy's will give back to the community. We will communicate regularly with our customers to build loyalty. We will only provide lab tested products that were purchased from licensed cultivators or processors.

3.4 Competitive Advantage

JimBuddy's has the following advantages compared to competitors:

- Location - located on State Route 33; near I-90 and I-91; on a bus route
- Employees - passionate, knowledgeable and personable and live locally
- Brand Recognition - great reputation, locally known and respected
- Community - the store is located in the same city that the owner has lived his entire life.

Staff will be thoroughly trained before starting and will receive on-going training. Through education, we can teach customers that a regulated market is assurance of a safe product. We have spent over 3 years building our brand and have an excellent reputation.

In the future, we will be applying for additional licenses. With additional licenses, we will be able to control our retail store inventory in regards to both quality and variety.

3.5 Regulations

Regulations set forth by the Cannabis Control Commission (CCC) 935 CMR 500.000.

All general requirements as required under 935 CMR 500.105, which include but are not limited to:

- Written operating procedures - 935 CMR 500.105 (1)
- Marijuana Establishment Agent Training - 935 CMR 500.105 (2)
- Requirements for the Handling of Marijuana - 935 CMR 500.105 (3)
- Marketing and Advertising Requirements - 935 CMR 500.105 (4)
- Labeling of Marijuana and Marijuana Products - 935 CMR 500.105 (5)
- Packaging of Marijuana and Marijuana Products - 935 CMR 500.105 (6)
- Packaging and Labeling Pre-Approval - 935 CMR 500.105 (7)
- Inventory - 935 CMR 500.105 (8)
- Record Keeping - 935 CMR 500.105 (9)
- Liability Insurance Coverage or Maintenance of Escrow - 935 CMR 500.105 (10)
- Storage Requirements - 935 CMR 500.105 (11)
- Waste Disposal - 935 CMR 500.105 (12)
- Access to the Commission, Emergency Responders and Law Enforcement - 935 CMR 500.105 (14)

Security Requirements for Marijuana Establishments set forth under 935 CMR 500.110

- General Requirements - 935 CMR 500.110 (1)(a) - 935 CMR 500.110 (1) (o)
- Alternate Security Provisions - 935 CMR 500.110 (2)
- Buffer Zone - 935 CMR 500.110 (3)
- Limited Access Areas - 935 CMR 500.110 (4)
- Security and Alarm Requirements for Marijuana Establishments Operating Enclosed Areas - 935 CMR 500.110 (5)
- Incident Reporting - 935 CMR 500.110 (7)
- Security Audits - 935 CMR 500.110 (8)

Additional Operational Requirements for Retail Sale as set forth under 935 CMR 500.140

- On-premises Verification of Identification for Adult Use Only Locations - 935 CMR 500.140 (2)
- Limitation on Sales - 935 CMR 500.140 (4)
- Unauthorized Sales and Right to Refuse Sales - 935 CMR 500.140 (5)
- Recording Sales - 935 CMR 500.140 (6)
- Consumer Education - 935 CMR 500.140 (8)
- Testing - 935 CMR 500.140 (9)
- Patient Supply - 935 CMR 500.140 (10)

Municipal Requirements set forth under 935 CMR 500.170 (1) & (2)

The City of Chicopee's regulations as set forth under the City of Chicopee Charter, Chapter 275, Section 72, Adult Use of Marijuana (Recreational).

4. PRODUCT/SERVICE LINE

4.1 Product or Service

Cannabis and cannabis infused products will be purchased from Massachusetts licensed cultivators and manufacturers. Products will be packaged and labeled as set forth under 935 CMR 500.105 (5) & (6). Concentrates, topicals and edibles will be prepackaged upon delivery and sold in that original packaging.

Types of cannabis products

- Flower
- Concentrates
- Topicals
- Edibles
- Vapable Cartridges
- Transdermal Patches
- Vape inhalers
- THC Infused Elixirs

In accordance with M.G.L. c. 94G §7, a Cannabis Retailer may not sell more than one ounce of cannabis or five grams of cannabis concentrate to a consumer per transaction.

Daily handouts, digital menu boards, newsletters and our website will inform customers which strains and products are available, in real time. Directions and warnings will be explained to the customer upon purchase, as well as education regarding safety and diversion to minors. Private consultations are available upon request.

4.2 Pricing Structure

The mark-up for the products will vary. Pre-packaged edibles and topicals will be marked up 100%. Extracts will be priced between an 80-100% mark-up. Due the

varety of options, the mark-up will range from 80-300%. The factors that help determine the pricing will be the strain and potency of the product. we will constantly monitor our competition to ensure we remain competitive.

4.3 Product/Service Life Cycle

We are currently in the process of obtaining a license to open a retail marijuana establishment. Upon provisional approval, construction will commence. The intention is to open the establishment in February 2019.

4.4 Intellectual Property Rights

JimBuddy's is in the process of being trademarked. James Robinson, CEO, is also the owner of JimBuddy's Vape Shop located at 1271 Memorial Drive, Chicopee, Massachusetts.

4.5 Research & Development

The company is planning to conduct the following research and development:

- Review available market research to identify trends and pricing
- Vendors will go through a vetting process to make sure their products are up to our quality standards.
- Determine the need for additional products within our market related to trying improved processes to opportunities for increased sales and promotion to potential customers.
- Travel to industry trade shows.

5. MARKETING & SALES

5.1 Growth Strategy

Revenue received from the business will be reinvested back into the business. We will strive to have the largest selection and variety available. As we grow, additional full and part-time employees will be hired. We have creative ideas for greater employee retention.

JimBuddy's will continue to focus on cannabis events both locally and nationwide, as well as various major market media, that includes industry magazines, events, forums, trade shows and conferences. It is our goal to create a platinum standard of dispensaries, and to also launch products that will help reinforce our branding efforts.

In the future, we will be applying for additional licenses.

5.2 Communication

Communication is key to success. Marketing materials for JimBuddy's Rec Shop will include and expand on the following items:

- Tri fold brochure / menu - collateral material
- Business referral program brochure and link from main web page
- Social Media (Facebook, Twitter, Instagram)
- LinkedIn Account
- Email blast to our customer base
- A customer appreciate program and frequent buyer offers

Web Plan - Our future website will have the dual goal of encouraging visitors to sign up for the JimBuddy's newsletter and to visit the retail establishment. A menu with images and descriptions of all items will be included.

The website's main pages will include:

- Menu, including monthly specials, new strains and any other new products.
- A drop-down location map of the retail establishment with driving and public transportation routes, along with our hours of operation.
- Contact information (includes area for questions and comments), and links to our social media pages.
- Job opportunity page showing the open positions at the establishment.
- Links to newsletters with articles about the Cannabis Industry.

Customers will be encouraged to sign up for the JimBuddy's monthly newsletter.

The newsletter will include tips, special offers, and introduction to our new products. Our goal is to have customers receive enough promotions and understanding to how serious our operation is about the safety and natural wholesomeness of cannabis and cannabis infused products.

Pricing - We will constantly monitor our competition to ensure we remain competitive.

Customer Retention - JimBuddy's Rec Shop will focus on customer service at the highest level, which we believe will reward us with continued customer retention and word of mouth referrals. In the future, we would like to offer weekly seminars on different aspects of cannabis use, cooking classes, and other educational opportunities to ensure our customers receive cutting edge information.

5.3 Prospects

There are many different way we will promote our establishment.

1. Agents will receive thorough training before assisting customers, and receive on-going training.
2. All employees will be trained on and will follow the company's SOPs.
3. The establishment will be kept clean and well lit.
4. Designed to be aesthetically pleasing to consumers.
5. Pricing will be competitive to other cannabis retail establishments.
6. Offer a large variety of products, in all price ranges.
7. A loyalty program will be implemented.
8. Monthly newsletter.

9. Attend trade shows.
10. Social Media will be utilized.

6.5 FINANCIAL ASSUMPTIONS

6.5.1 Assumptions for Profit and Loss Projections

Once a provisional license is obtained, the first three months will be part of the construction phase. We project the store to open in February 2019. Our biggest expenses within our start-up costs are a security system as required by the state, construction, design, pharmaceutical grade safes and legal fees. Inventory will not be purchased until a few days prior to the store opening.

6.5.2 Assumptions for Cash Flow Analysis

This industry is rapidly growing. The product is in high demand. 100% of the sales are collected at the time of purchase. Payables are due within 30 days of purchase. Revenue will be put back into the business. Inventory will be replenished every 3-4 days. We will only keep enough inventory on hand for a three day supply.

6.5.3 Assumptions for Balance Sheet

The balance sheet shows healthy growth of net worth, and strong financial position. This industry will continue to grow rapidly.

6.5.4 Assumptions for Break Even Analysis

We do not expect to break even until 1 1/2 years into the business operation. The break-even assumes variable costs of 25 percent of revenue.

FINANCIAL PROJECTIONS

PROFIT & LOSS

	Year 1	Year 2	Year 3	Year 4	Year 5
Sales	\$756,000	\$1,848,000	\$3,250,000	\$3,900,000	\$4,475,000
Costs/Goods Sold	\$376,800	\$694,400	\$1,061,000	\$1,500,000	\$1,875,000
GROSS PROFIT	\$379,200	\$1,153,600	\$2,189,000	\$2,400,000	\$2,600,000

OPERATING EXPENSES

Salary (Office & Overhead)	\$40,000	\$60,000	\$80,000	\$100,000	\$120,000
Payroll (taxes, etc.)	\$108,500	\$331,000	\$382,000	\$390,000	\$397,000
Outside Services (Security, Contractors, etc)	\$27,000	\$36,000	\$36,000	\$36,000	\$36,000
Supplies (office & operation)	\$29,000	\$15,000	\$15,000	\$20,000	\$22,000
Repairs & Maintenance	\$2,300	\$1,800	\$1,800	\$2,000	\$1,000
Advertising	\$200	\$500	\$500	\$500	\$500
Car, delivery & travel	\$500	\$500	\$500	\$500	\$500
Accounting & Legal	\$11,300	\$8,000	\$8,000	\$10,000	\$10,000
Rent	\$10,800	\$21,600	\$21,600	\$21,600	\$21,600
Telephone	\$750	\$500	\$500	\$1,000	\$1,000
Utilities	\$2,050	\$4,020	\$4,020	\$6,040	\$6,040
Insurance	\$5,000	\$15,000	\$20,000	\$25,000	\$30,000
Taxes (real estate, etc)	\$82,000	\$198,000	\$349,375	\$419,250	\$481,062
Interest	\$250	\$250	\$250	\$0	\$0
Other Expenses (Local Sales Tax and Revenue Sharing)	\$126,630	\$309,540	\$544,375	\$628,125	\$711,875
TOTAL EXPENSES	\$446,280	\$1,001,710	\$1,463,920	\$1,660,015	\$1,838,577

NET PROFIT (before taxes)	-\$67,080	\$151,890	\$725,080	\$739,985	\$761,423
Income Taxes	\$5,000	\$32,000	\$150,000	\$155,000	\$160,000
NET PROFIT (after tax)	-\$72,080	\$119,890	\$575,080	\$584,985	\$601,423
ADJUSTED TO BE RETAINED	-\$72,080	\$119,890	\$575,080	\$584,985	\$601,423

CASH FLOW (06/01/2018 to 06/01/2023)

	Pre Startup EST	Year 1	Year 2	Year 3	Year 4	Year 5
Cash on hand	\$205,000	\$283,205	\$447,120	\$575,080	\$584,985	\$601,423
CASH RECEIPTS						
Cash Sales		\$756,000	\$1,848,000	\$3,250,000	\$3,900,000	\$4,475,000
Collections from CR Accounts					\$0	\$0
Loan/Cash Injection	\$200,000				\$0	\$0
TOTAL CASH RECEIPTS	\$200,000	\$756,000	\$1,848,000	\$3,250,000	\$3,900,000	\$4,475,000
TOTAL CASH AVAILABLE (before cash out)	\$405,000	\$1,039,205	\$2,295,120	\$3,825,080	\$4,484,985	\$5,076,423
CASH PAID OUT						
Purchases	\$50,000	\$226,800	\$554,400	\$756,000	\$1,500,000	\$1,875,000
Gross Wages		\$248,500	\$531,000	\$767,000	\$490,000	\$517,000
Outside Services (Security, Contractors, etc)	\$21,000	\$6,000	\$27,000	\$27,000	\$27,000	\$27,000
Supplies	\$9,600	\$3,400	\$18,000	\$18,000	\$20,000	\$22,000
Repairs & Maintenance	\$2,300		\$1,800	\$1,800	\$2,000	\$1,000
Advertising		\$200	\$500	\$500	\$500	\$500
Car, delivery & travel		\$500	\$500	\$500	\$500	\$500
Accounting & Legal	\$6,000	\$5,300	\$8,000	\$8,000	\$10,000	\$10,000
Rent	\$14,400	\$7,200	\$21,600	\$21,600	\$21,600	\$21,600
Telephone		\$250	\$500	\$500	\$1,000	\$1,000
Utilities	\$1,595	\$455	\$4,020	\$4,020	\$6,040	\$6,040
Insurance	\$2,000	\$3,000	\$15,000	\$18,000	\$21,000	\$26,000
Taxes (real estate, etc)		\$82,000	\$198,000	\$349,375	\$419,250	\$481,064
Capital purchase	\$20,000					
Interest		\$250	\$250	\$250	\$500	\$500
Other Expenses (Local Sales Tax and Revenue Sharing)	\$5,300	\$98,330	\$309,540	\$544,375	\$628,125	\$711,875
SUBTOTAL	\$132,195	\$682,185	\$1,690,110	\$2,516,920	\$3,147,515	\$3,701,079
TOTAL CASH PAID OUT	\$132,895	\$592,085	\$1,476,110	\$2,516,920	\$3,147,515	\$3,701,079
CASH POSITION		\$163,915	\$371,890	\$733,080	\$752,485	\$773,921

ASSETS

CURRENT ASSETS		
Cash In Bank	\$280,000	\$773,921
Accounts Receivable		
Inventory	\$200,000	\$2,000,000
Prepaid Expenses		
Deposits		
Other current assets		
TOTAL CURRENT ASSETS	\$480,000	\$2,773,921

FIXED ASSETS		
Machinery & Equipment	\$20,000	\$30,000
Furniture & Fixtures	\$30,000	\$20,000
Leaseholder improvements	\$15,000	\$10,000
Land & buildings		
Other fixed assets		
TOTAL FIXED ASSETS (net of depreciation)	\$65,000	\$60,000
TOTAL ASSETS	\$545,000	\$2,833,921

Liabilities & Equity

CURRENT LIABILITIES		
Accounts Payable	\$237,000	\$674,436
Interest Payable	\$5,000	\$5,000
Taxes Payable	\$228,000	\$995,000
Notes, short term (due in 12 months)		\$450,000
Current part, long-term debt		\$400,000
TOTAL CURRENT LIABILITIES	\$470,000	\$2,524,436

LONG TERM DEBT

Bank loans payable		
Notes payable to stockholders		
LESS: short-term portion		\$5,000
Other long-term debt	\$75,000	\$150,000
TOTAL LONG-TERM DEBT	\$75,000	\$155,000
TOTAL LIABILITIES	\$545,000	\$2,679,436

OWNERS EQUITY

Common stock		
Retained Earnings		\$154,485
TOTAL OWNERS EQUITY	\$0	\$154,485
TOTAL LIABILITIES & EQUITY	\$545,000	\$2,833,921

BREAK EVEN ANALYSIS

DIRECT COSTS	Fixed Cost (\$)	Variable Costs (%)
Cost of Goods Sold	\$100,000	
Inventory	\$200,000	
Raw Materials	\$5,000	
Direct Labor	\$108,500	

INDIRECT COSTS

Salaries	\$140,000
Supplies	\$12,000
Repairs & Maintenance	\$2,300
Advertising	\$200
Car, delivery & Travel	
Rent	\$10,800
Telephone	\$750
Utilities	\$2,050
Insurance	\$5,000
Taxes	\$80,000
Interest	\$250
Other Expenses (Local Sales Tax and Revenue Sharing)	\$126,000
TOTAL DIRECT COSTS	\$413,500
TOTAL INDIRECT COSTS	\$253,350

BREAK EVEN SALES LEVEL

\$666,850

PLAN FOR OBTAINING LIABILITY INSURANCE

JimBuddy's Rec Shop's plan to obtain liability insurance is to use our existing business insurance agency; Goss & McLain located at 1767 Northampton St., Holyoke, MA 01040. The policy provider will be; The James River Insurance Company, who will provide an insurance policy that meets the requirements of 935 CMR 500.105(10)(a). We will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually. The deductible for each policy shall be no higher than \$5,000 per occurrence.

Insurance Agency

Goss & McLain Insurance Agency
1767 Northampton Street
Holyoke, MA 01040
413-534-7355

Insurance Agent

Lauren Eckhardt

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Standard Operating Procedure RECORD KEEPING

1. Purpose

To explain JimBuddy's record keeping policy, including where and how it is stored.

2. Scope

To guide employees who provide back office support and are responsible for the records maintained by the company.

3. Prerequisites

Employees need to be at a certain security level in order to have access to the database, passwords, and physical hard copy. Obtaining this security level includes original training and specialty training in back-room procedures, record databases, and protocols for record retention/destruction. The Director of Operations will maintain a list of all employees with access to the ability to purge records from the software system, and also who may designate records to be physically shredded.

4. Responsibilities

Only senior level employees may actually destroy records, and only upon clearance with the Director of Operations, who will provide time frames for record destruction based on outside counsel's interpretation of the regulations.

5. Procedure

JimBuddy's Rec Shop will retain all records, both physical and electronic for a minimum of six years. Electronic data will be encrypted and stored on secure servers in secure storage areas under 24-hour surveillance. The secure storage room will have limited access. The establishment may utilize biometric security measures as well as pin number protection. Access Logs will be analyzed daily to ensure no unauthorized entry has occurred. All records will be stored as set forth under 935 CMR 500.105(8) and (9).

Records and Documents Storage Retention – Unless otherwise specified, JimBuddy's will retain and maintain all records and duplicate sets of records for a minimum of six (6) years.

Duplicate Records and Off-Site Storage – JimBuddy's will maintain duplicate sets of all records required by regulation. These duplicate copies of the establishment's records will be maintained at a secure, off-site location. This location will only be disclosed to personnel with proper security clearance. The off-site record storage will be secured with a security alarm and surveillance system to ensure access is limited to authorized personnel only. JimBuddy's will maintain duplicate copies of all records at a secure storage facility within the state.

Reports – JimBuddy's can generate a list of the products and their specifications that have been offered for distribution. These reports are available upon request.

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- Reports can be created through the POS system and the Metrc Seed-to-Sale inventory software.
- Within the inventory control system, the establishment will be able to generate a list of all products along with their specifications that were offered for distribution.
 - This list can be generated for all products offered with specific date ranges.

Record Retention - The establishment shall retain for a minimum of six years business operation records including but not limited to:

- a. Inventory records as required by 935 CMR 500.105(8);
- b. Seed-to-sale tracking records for all cannabis products as required by 935 CMR 500.105(8)(e).
- c. Written operating procedures as required by 935 CMR 500.105(1).
- d. Financial records to include but not limited to:
 - i. assets and liabilities;
 - ii. bank deposits and withdrawals;
 - iii. accounting books;
 - iv. sales reports including the quantity, form and cost of cannabis products;
 - v. salary wages paid to each employee, stipend paid to each board member and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with JimBuddy's.
- e. Logs of entry and exit for dispensary facilities.
- f. Employee records to include, but not limited to:
 - i. job descriptions and organizational charts;
 - ii. personnel records for each employee;
 1. All records shall be maintained for at least 12 months after termination of the employee's affiliation with JimBuddy's.
 - iii. all materials submitted to the Commission as per 935 CMR 500.030(2);
 - iv. documentation of verification of references;
 - v. the job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - vi. documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the employee indicating the date, time and place the training was received, topics discussed and the name and title of the presenters.
 - vii. performance evaluations;
 - viii. record of any disciplinary action taken;
 - ix. notice of completed responsible vendor and eight-hour related duty training;
 - x. all background check reports obtained in accordance with 935 CMR 500.030.
- g. Waste Disposal will be handled according to the regulations set forth under 935 CMR 500.105(12).
 - i. No fewer than two Managers must witness and document how cannabis waste is disposed or otherwise handled (recycled, composted, etc.).
 - ii. When the waste is disposed or handled, the following steps need to be taken:
 1. create and maintain a written or electronic record of the date;
 2. provide the type and quantity disposed or handled;
 3. describe the manner of disposal or other handling;
 4. note the location of disposal or other handling;
 5. signature of both managers involved is required;
 6. these records will be kept for at least three years;
- h. All files are available for inspection by the Cannabis Control Commission upon request.

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In the event the establishment was to cease operations, all records will be kept for at least two years, in a form and location acceptable to the Commission.

6. References

All records will be maintained and stored as set forth under state regulations 935 CMR 500.105 (8).

7. Reporting

Any and all changes to the record keeping procedure must be vetted by the Director of Operations. If the procedure is changed, a copy is circulated to all employees through secure email. Records are available for inspection by the Commission, upon request. JimBuddy's Rec Shop records shall be maintained in accordance with generally accepted accounting principles.

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Standard Operating Procedure MAINTAINING OF FINANCIAL RECORDS

1. Purpose

Good record keeping is essential to ensuring our business runs smoothly. It will allow us to track the business' progress and stay organized. It will also help JimBuddy's Rec Shop remain in compliance.

2. Scope

The scope of this SOP is to explain how the financial records will be maintained.

3. Prerequisites

The records of the Marijuana Retail Establishment shall be maintained in accordance with generally accepted accounting principles. JimBuddy's will utilize a POS system approved by the Commission, in accordance with the DOR.

4. Responsibilities

All employees shall receive training on confidentiality. Everyone is responsible for keeping information confidential.

5. Procedure

JimBuddy's Rec Shop shall keep and maintain upon the permitted premises for a six-year period true, complete, legible and current books and records, including but not limited to the following:

- Inventory tracking including transport of cannabis and cannabis infused products;
- Sales and compliance;
- Financial records including Company income, expenses, bank deposits and withdrawals, and audit reports;
- Logs of entry and exit for dispensary facilities;
- Employee records;
- Security recordings;

The dispensary will submit quarterly reports on the 15th of each quarter, thus, on January 15, April 15, July 15 and October 15. (Reports will be considered on time if submitted the next day if the 15th is a Saturday, Sunday or a State holiday). Reports shall include, but are not limited to pursuant to 935 CMR 500.105:

- Records of entry and exit for all individuals who entered the facility.
- Amounts by category of cannabis products offered for sale by the dispensary.
- Amounts by category of cannabis and manufactured cannabis products sold by the dispensary.
- A list of all cannabis, cannabis infused products or unusable cannabis materials that have been destroyed or will be destroyed by the dispensary.
- A summary of the financial statement.
- Laboratory results of all tests that were conducted.

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- Description of any breach or halt in the dispensary's security system and tracking system
- Any additional information requested by the department.

Record Retention - The establishment shall retain for a minimum of six years business operation records including but not limited to:

- Inventory records as required by 935 CMR 500.105(8);
- Seed-to-sale tracking records for all cannabis products as required by 935 CMR 500.105(8)(e).
- Written operating procedures as required by 935 CMR 500.105(1).
- Financial records to include but not limited to:
 - assets and liabilities;
 - bank deposits and withdrawals;
 - accounting books;
 - sales reports including the quantity, form and cost of cannabis products;
 - salary wages paid to each employee, stipend paid to each board member and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with JimBuddy's;
- Logs of entry and exit for dispensary facilities; and
- Employee records.

In the event the establishment was to cease operations, all records will be kept for at least two years, in a form and location acceptable to the Commission.

JimBuddy's Rec Shop shall conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. The Company shall maintain records that it has performed of the monthly analysis and produce it upon request to the Commission. If it is determined that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:

- It shall immediately disclose the information to the Commission;
- Cooperate with the Commissions in any investigation regarding manipulation or alteration of sales data; and
- Take such other action directed by the Commission to comply with 935 CMR 500.105.

JimBuddy's shall adopt separate accounting practices at the point-of-sale for cannabis and cannabis infused product sales, and non-cannabis sales.

6. References

Reference SOPs for Cash Management and Record Keeping. All records will be maintained and stored as set forth under state regulations 935 CMR 500.105(8) & (9). In addition, all retailers shall comply with 830 CMR 62C.25.1: Record Retention and DOR Directive 16-1 regarding record keeping requirements.

7. Reporting

All files are available for inspection by the Commission, upon request. The Compliance Manager will ensure reports are accurate and on-time.

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Standard Operating Procedure QUALITY CONTROL AND TESTING

1. Purpose

The purpose of this SOP is to explain the Quality Control and Testing policy.

2. Scope

The scope of this SOP is to highlight the overall quality control and testing processes to be followed.

3. Prerequisites

In order to understand this SOP, registered employees must have already received initial training and passed the probationary period.

4. Responsibilities

It is the responsibility of the manager and the personnel responsible for training new employees to ensure they understand the overall regulations.

5. Procedure

Cannabis and cannabis infused products will arrive at JimBuddy's Rec Shop, from the licensed Marijuana Establishment, with the required test results. JimBuddy's is not required to perform any additional testing on those products already tested by an Independent Testing Laboratory.

1. No cannabis product, including cannabis, may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. Testing of cannabis products shall be performed by an Independent Testing Laboratory in compliance with the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*, as amended in November, 2016, published by the DPH. Testing of environmental media (e.g., soils, solid growing media, and water) shall be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the DPH.
2. A Marijuana Establishment shall have a written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1). Any such policy shall include notifying the Commission within 72 hours of any such policy shall include notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch.
 - a. The notification must be from both the Marijuana Establishment and the Independent Testing Laboratory, separately and directly. The notification from the Marijuana Establishment must describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.
3. A Marijuana Establishment will ensure that only the leaves and flowers of the female cannabis plant are processed accordingly in a safe and sanitary manner as prescribed below:

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- a. Well cured and generally free of seeds and stems;
 - b. Free of dirt, sand, debris and other foreign matter;
 - c. Free of contamination by mold, rot, other fungus and bacterial diseases;
 - d. Prepared and handled on food-grade stainless steel tables; and
 - e. Packaged in a secure area. 935 CMR 500.105(3) (required for cultivators, product manufacturers, microbusiness and craft marijuana cooperatives)
4. All agents whose job includes contact with cannabis is subject to the requirements for food handlers as specified in 105 CMR 300.000.
 5. Any agent working in direct contact with cannabis shall conform to sanitary practices while on duty, including:
 - a. Maintaining adequate personal cleanliness; and
 - b. Washing hands appropriately. 935 CMR 500.105(3)
 6. Hand-washing facilities shall be located in production areas and where good sanitary practices require employees to wash and sanitize their hands as required in 935 CMR 500.105(3).
 7. There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations. 935 CMR 500.105(3).
 8. Litter and waste shall be properly removed so as to minimize the development of odor and the potential for the waste attracting and harboring pests. Refer to 935 CMR 500.105(12) and 935 CMR 500.105(3).
 9. Floors, walls, and ceiling shall be constructed in such a manner that they may be adequately kept clean and in good repair. 935 CMR 500.105(3)
 10. All contact surfaces shall be maintained, cleaned and sanitized as frequently as necessary to protect against contamination. 935 CMR 500.105(3)
 11. All toxic items shall be identified, held and stored in a manner that protects against contamination of cannabis. 935 CMR 500.105(3)
 12. Water supply shall be sufficient for necessary operations. 935 CMR 500.105(3)
 13. Plumbing shall be of adequate size and design and maintained to carry sufficient quantities of water to required locations throughout the establishment. 935 CMR 500.105(3)
 14. The establishment shall provide its employees with adequate, readily accessible toilet facilities. 935 CMR 500.105(3)
 15. Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical and microbial contamination. 935 CMR 500.105(3)
 16. A Marijuana Establishment shall maintain the results of all testing for no less than one year.
 17. The sale of seeds is not subject to these testing provisions.
 18. Clones are subject to these testing provisions, but are exempt from testing for metals.
 19. All transportation of cannabis to and from Independent Testing Laboratories providing cannabis testing services shall comply with 935 CMR 500.105(13).
 20. All storage of cannabis at a laboratory providing cannabis testing services shall comply with 935 CMR 500.105(11).
 21. All excess cannabis must be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess cannabis to the source Marijuana Establishment for disposal or by the Independent Testing Laboratory disposing of it directly.
 22. No cannabis product shall be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

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6. *References*

Testing requirements in compliance with 935 CMR 500.160. Transportation requirements in compliance with 935 CMR 500.105(13). Storage of cannabis in compliance with 935 CMR 500.105(11). Disposal of cannabis in compliance with 935 CMR 105(12). Sanitary compliance as required in 935 CMR 500.105(3).

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Standard Operating Procedure RESTRICTING ACCESS TO AGE 21 AND OLDER

1. Purpose

To enforce our strict age requirement and to prevent the diversion of marijuana to individuals younger than 21 years old.

2. Scope

The scope of this SOP is to explain the multi layered ID checking process.

3. Prerequisites

All employees and registered agents must be 21 years of age or older as required in 935 CMR 500.029 or 500.030.

All staff must receive training on

- Using the scanner to verify the authenticity of IDs
- Properly checking the IDs (picture, expiration date, age)
- How to spot a fake or tampered IDs
- Knowledge of out-of-state IDs
- Understand the State law regarding age restrictions

4. Responsibilities

The Network Administration will ensure the ID scanner, and any other relevant equipment, remain in excellent working condition. Security guards will physically check the government ID before the customer enters the vestibule. The Receptionist will scan the ID before the customer is allowed entry to the dispensary. Dispensary Agents will verify the ID before finalizing the transaction. Management will provide initial and ongoing training. All employees take responsibility to prevent the diversion of marijuana to individuals younger than 21 years old. Managers will provide on-going training.

5. Procedure

All visitors must be 21 years of age or older as required under 935 CMR 500.002.

The multi layered ID checking process is to prevent individuals under 21 years of age from entering the dispensary. This policy is required and all staff must adhere to it. Any person without a valid government ID will be turned away before entering the building.

The security guard will have the first contact with customers. Customers must present their valid government ID. The security guard must correctly read and validate their ID before allowing the customer to enter the vestibule. The security guard will be checking to confirm the ID is not fake, altered, or borrowed, in addition to verifying the age. Expired identification will not be accepted.

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The receptionist will then greet the customer and ask for their government ID. The receptionist will use a scanner to scan the barcode on ID, in which to verify the validity of the ID and the customer's age.

Customers will wait in the vestibule until called. At that time, the customer may enter the dispensary.

Upon finalizing the transaction and cashing out, the dispensary agent will again verify the customer's government issued ID. The dispensary agent will not be allowed to complete the transaction without first verifying the ID.

6. References

Requirements for On-premises Verification of Identification for Adult Use Only locations can be found at 935 CMR 500.140(2). For additional information on refusing sales due to anyone who is unable to produce valid proof of identification, refer to CMR 500.140(5).

7. Reporting

Notify a manager immediately if a customer attempts to obtain access with a fake, borrowed or altered ID. Managers will provide ongoing training. The Director of Operations will update training materials, as needed. The Network Administrator will provide regular updates and reports to the Director of Operations in the regards to the equipment. Human Resources will maintain all necessary records.

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Standard Operating Procedure BACKGROUND CHECK

1. Purpose

Prior to employment at JimBuddy's Rec Shop, each employee must pass a criminal background check as required by the State under 935 CMR 500.030.

2. Scope

The scope of this SOP is to explain the mandatory criminal background check policy.

3. Prerequisites

Each individual must complete the application for the criminal background check as required under 935 CMR 500.030 and allow a JimBuddy's executive to request an iCori check. The application will be submitted to the Commission to determine suitability. The Commission shall issue a registration card for the individual in order to commence working at the Marijuana Retail Establishment.

4. Responsibilities

The Director of Operations will request the iCori reports and submit the applications to the Commission. The Human Resources Manager will maintain the copies in the individual's personnel file.

5. Procedure

The Commission shall issue a registration card to each individual determined to be suitable for registration. All such individuals shall:

- a. be 21 years of age or older;
- b. not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and
- c. be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

An application for registration of a marijuana establishment agent shall include:

- a. the full name, date of birth, and address of the individual;
- b. all aliases used previously or currently in use by the individual, including maiden name, if any;
- c. a copy of the applicant's driver's license, government-issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission;
- d. an attestation that the individual will not engage in the diversion of cannabis products;

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- e. written acknowledgment by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense marijuana in the Commonwealth;
- f. background information, including, as applicable:
 1. a description and the relevant dates of any criminal action under the laws of the Commonwealth, or another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority, whether for a felony or misdemeanor and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;
 2. a description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority relating to any professional or occupational or fraudulent practices;
 3. a description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration, or the denial of a renewal of a license or registration, for any type of business or profession, by any federal, state, or local government, or any foreign jurisdiction;
 4. a description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or a like action or complaint by another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority with regard to any professional license or registration held by the applicant; and
 5. any other information required by the Commission.

A registration card shall be valid for one year from the date of issue, and may be renewed on an annual basis upon a determination by the Commission that the applicant for renewal continues to be suitable for registration.

For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.030(1):

- a. All conditions, offenses and violations are construed to include Massachusetts law or like or similar laws of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.
- b. All criminal disqualifying conditions, offenses, and violations including the crimes of attempt, accessory, conspiracy and solicitation. Juvenile dispositions shall not be considered as a factor for determining suitability.
- c. Where applicable, all look back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802.

All suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, the Suitability Review Committee shall:

1. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802: Tables B through D renders the subject unsuitable for registration regardless of the determination of the licensee; and
2. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than DCJIS.

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6. References

Background requirements as set forth under 935 CMR 500.030. Regulations set forth under 935 CMR 500.105(l). Record keeping requirements as set forth under 935 CMR 500.105(9).

7. Reporting

A Marijuana Retail Establishment Executive registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration, shall submit to the Commission a Criminal Offender Record Information (CORI) report and any other background check information required by the Commission for each individual for whom the Marijuana Establishment seeks a marijuana establishment agent registration, obtained within 30 days prior to submission. A Director shall notify the Commission no more than one business day after a marijuana establishment agent ceases to be associated with the establishment. The registration shall be immediately void when the agent is no longer associated with the establishment.

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Standard Operating Procedure EMPLOYEE DISMISSAL POLICY

1. Purpose

It is the policy of JimBuddy's Rec Shop to encourage fair, efficient and equitable solutions for problems arising out of the employment relationship and to meet the requirements of state and federal law.

2. Scope

The policies and procedures are applicable to conduct or job performance of an employee that results in a decision to impose a disciplinary penalty of demotion, suspension without pay or dismissal.

3. Prerequisites

Each employee is expected to acquaint themselves with performance criteria for their particular job and with all rules, procedures, and standards of conduct established by JimBuddy's Rec Shop. An employee who does not fulfill the responsibilities set out by such performance criteria, rules, procedures and standards of conduct may be subject to adverse personnel action. Employees will go through a 90-day trial period. Employees must complete all required trainings for their positions within 90 days of hire. Each employee must pass the criminal background check as required under 935 CMR 500.030.

4. Responsibilities

Each employee is responsible for their own actions. Managers will be responsible for making sure all required trainings are completed. All records will be held confidentially by the Human Resources Manager in the individual's personnel file.

5. Procedure

The policy requires **immediate dismissal** of any employee who has:

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

Conduct Which is Subject to Disciplinary Action

1. Work Performance
 - a. Failure of an employee to maintain satisfactory work performance standards can constitute good cause for disciplinary action including dismissal.
 - b. Work performance is to be judged by the manager's evaluation of the quality and quantity of work performed by each employee. When, in the opinion of the manager, the work

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performance of an employee is below standard, the manager should take appropriate disciplinary action.

2. Misconduct

- a. All employees are expected to maintain standards of conduct suitable and acceptable to the work environment. Disciplinary action, including dismissal, may be imposed for unacceptable conduct.
- b. Examples of unacceptable conduct include, but are not limited to:
 - i. Falsification of time sheets, personnel records or any other records;
 - ii. Neglect of duties, loafing or wasting time during working hours;
 - iii. Forgetting, losing or misplacing, or not wearing the required identification badge;
 - iv. Smoking anywhere except in designated smoking areas;
 - v. Attempting to gain access to a Limited Access Area without proper authorization;
 - vi. On-site consumption of cannabis is strictly prohibited in and on the premises;
 - vii. Gambling, participating in lotteries or any other games of chance on the premises at any time;
 - viii. Soliciting, collecting money or circulating petitions on the premises;
 - ix. Bringing intoxicants or drugs onto the premises of the establishment, using intoxicants or drugs, having intoxicants or drugs in one's possession, or being under the influence of intoxicants or drugs on the premises at any time.
 - x. Abuse or waste of tools, equipment, fixtures, property, supplies or goods of the establishment;
 - xi. Creating or contributing to unhealthy or unsanitary conditions;
 - xii. Violations of safety rules or accepted safety practices;
 - xiii. Failure to cooperate with manager or coworker, impairment of function of work unit, or disruptive conduct;
 - xiv. Disorderly conduct, horseplay, harassment of other employees (including sexual harassment) or use of abusive language on the premises.
 - xv. Fighting, encouraging a fight or threatening, attempting or causing injury to another person on the premises;
 - xvi. Neglect of duty or failure to meet a reasonable and objective measure of efficiency and productivity;
 - xvii. Theft, dishonesty or unauthorized use of the Company's property including records and confidential information.
 - xviii. Creating a condition hazardous to another person on the premises;
 - xix. Refusal of an employee to follow instructions or to perform designated work that may be required of an employee or refusal to adhere to established rules and regulations.
 - xx. Repeated tardiness or absence, absence with proper notification to the manager or without satisfactory reasons or unavailability for work; and
 - xxi. Violation of JimBuddy's Rec Shop policies or rules.
- c. Investigations
 - i. All incidents that involve the potential for disciplinary action shall be investigated by the employee's manager or other designated administrative official.

3. Records of Disciplinary Actions

- a. Copies of all documents pertaining to disciplinary actions shall be filed in the employee's personnel file.
- b. Personnel records shall be maintained for at least 12 months after termination of the individual's affiliation with JimBuddy's.

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6. References

Reference City of Chicopee Adult Use of Marijuana (Recreational) Chapter 275, Section 72. Reference Record Keeping SOP for requirements for record retention and 935 CMR 500.105(9)(d). Background requirements as set forth under 935 CMR 500.030. Regulations set forth under 935 CMR 500.105(l).

7. Reporting

The Director of Operations shall notify the Commission no more than one business day after a JimBuddy's employee ceases to be associated with the Marijuana Establishment. The registration shall be immediately void when the agent is no longer associated with the establishment.

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Standard Operating Procedure DRESS CODE AND HYGIENE POLICIES

1. Purpose

All employees are expected to present a professional appearance by wearing appropriate dress and maintaining proper grooming and hygiene habits at all times.

2. Scope

The scope of this SOP is for all employees.

3. Prerequisites

All employees will be told what the mandatory dress code is for working in the establishment. Each employee will be given an employee handbook which will outline the appropriate dress code for their positions.

4. Responsibilities

It is the responsibility of the managers to ensure that all employees adhere to this policy. If an employee is dressed inappropriately, the manager will inform the employee of the inappropriateness and the reason it is deemed to be so. If the employee's appearance is unduly distracting or inappropriate, the employee may be sent home to take the appropriate corrective action and then return to work. An employee who is sent home to correct their appearance may use personal leave time, if applicable, to cover the time that she/he is away from the office to change into proper attire. Repeated violation of the dress code policy may result in disciplinary action. This policy is intended to be as comprehensive as possible, however managers, with counsel from the Human Resources department, have the final discretionary authority.

5. Procedure

Appropriate dress, proper grooming and hygiene are essential to ensure JimBuddy's employees portray a positive and professional image of the establishment. All clothing should be in good condition, meaning not torn, ripped, or soiled. Inappropriate dress includes, but is not limited to, attire that would normally be considered "leisure", "work-out", or "recreational" in nature.

Personal Grooming

1. Hair should be clean and neatly arranged.
2. Facial hair should be neatly trimmed.
3. Fingernails should be clean and neat and of an appropriate length.

Attire

Examples of **inappropriate** dress include:

1. pants that are tight and form-fitting such as yoga, leggings, spandex bicycle pants, etc.,
2. sweat pants, sweat shirts, and sweat suits,
3. shorts and skorts,

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4. tube tops, muscle tops, and cropped tops,
5. skirts and dresses that reveal the majority of the area between the top of the knee and the hip. This includes clothing that contains a slit or split that produces the same result,
6. clothing that exposes the abdomen, buttocks, breast, or chest area,
7. tank tops without a cover-up,
8. clothing that contains writing and/or graphics that could be considered offensive, vulgar, or insulting,
9. flip-flops, athletic sandals or Crocs clogs, and
10. slippers

Identification Badges

All staff are required to display their JimBuddy's identification in a manner visible while working in the establishment.

Hygiene

Employees are expected to meet hygiene requirements during regular business hours for the duration of their employment.

- Maintain personal cleanliness by bathing daily.
- Oral hygiene (brushing of teeth) required.
- Use deodorant / anti-perspirant to minimize body odors.
- No heavily scented perfumes, colognes and lotions. These can cause allergic reactions, migraines and respiratory difficulty for some employees, visitors and customers.
- Clean and trimmed fingernails.
- Wash hands after eating or using the restrooms.

Other Exceptions to this Policy

At the discretion of a Director, formal business attire may be required of all JimBuddy's staff. All employees are expected to dress in a manner that is acceptable for a professional atmosphere. JimBuddy's employees represent the Brand to clients and colleagues, and employee appearance should reflect professionalism and respect. Employees in situations requiring more formal business attire (employees conducting business or attending meetings, seminars, etc., or those who have regular contact with other business professionals or the public, i.e. JimBuddy's clientele) should dress accordingly to represent the Brand as appropriate. This includes but is not limited to Business Consultants, On-the Job Training Specialists, staff attending business-related meetings in the community, business seminars, and regional/state trainings. More formal business attire consists of conservative shirts, jackets, ties, pants, skirts, or dresses and may be worn in any color.

6. *References*

Refer to Dress Code and Hygiene Policy in the Employee Handbook. Reference all related SOPs for Personnel Policies as set forth under 935 CMR 500.105(1).

7. *Reporting*

Any infractions of the dress code must be written, documented, and put in the employee's personnel file.

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Standard Operating Procedure EMPLOYEE TIME SHEETS

1. Purpose

The purpose of this SOP is to explain the process for employees preparing and submitting time sheets for payroll purposes.

2. Scope

This SOP is for all hourly employees.

3. Prerequisites

Employees must have an understanding of the payroll time schedules, filing out time sheets, and breaking down time into hours worked, sick time, vacation time, holiday time, maternity leave, etc.

4. Responsibilities

It is the responsibility of all employees to turn in accurate and signed time sheets, which are then signed off by the manager and the payroll department.

5. Procedure

Pay periods are every two weeks. All pay checks for two-week pay periods will be distributed within five working days after the last working day of the period. Paychecks are directly deposited into individual employee checking or savings accounts.

General Policies:

- a. All non-salaried JimBuddy's Rec Shop employees are required to submit a time sheet which must be received by the Human Resources Manager by Monday at 10 a.m. following the end of the pay period.
- b. All additions or changes in payroll must be completed on the Employee Data Form, signed by the employee and submitted to a manager for signature and filing in the personnel file. The employee must sign for all changes. This form is used for all individualized changes to an employee's status including salary or wage, job title, working status, name or address change or benefits.
- c. No advances on salaries or loans to employees will be made.
- d. Payment to all employees will be based on the approved time sheets.
- e. Payroll checks will be direct deposited to employees' financial institution. Check stubs will be available with seven business days. Employee's checks will not be given to anyone except the employee, unless a written consent has been sent to the Director of Operations in advance of the payroll. The Director of Operations cannot accept verbal permission to distribute an employee's paycheck to another party.
- f. A new employee will not be put on payroll without the Employee Data Form signed by the Director of Operations, a W-4 form and an I-9 form.
- g. All payroll will be done on a computerized system and will be outsourced to a local payroll company.

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Procedures:

- a. Each employee will complete and submit a signed individual time sheet showing hours worked, sick time, vacation time and holidays time taken.
- b. Each manager will review for accuracy and sign the time sheets. All time sheets are to be sent to the Director of Operations for approval and signature.
- c. If an employee has not yet enrolled for direct deposit, the payroll check will be distributed to the employee no earlier than 4 p.m. on the fifth workday following the close of the pay period.
- d. Payroll deductions will be made for FICA, Federal and State Income taxes, applicable health benefits and any other amounts required by State or Federal law. These accumulated deductions will be submitted to the proper entity on or before their due date.
- e. An accounting of deductions will be given to the employee as part of the payroll documentation. Employees are instructed to verify that the deductions are correct and maintain their pay stubs.

6. *References*

Refer to the employee handbook for any questions concerning filing out the employee time sheet. Also refer to the SOPs relating to personnel policies and 935 CMR 500.105(1).

7. *Reporting*

All employees must turn in their signed timesheets to their manager, who will sign them and turn them over to the payroll department. Employees with questions regarding their pay should contact the Human Resources Manager.

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Standard Operating Procedure FAMILY & MEDICAL LEAVE

1. *Purpose*

To provide procedures for the Family and Medical Leave Policy.

2. *Scope*

JimBuddy's will grant a leave of absence to eligible employees under the Family and Medical Act as administered by the U.S. Department of Labor. These procedures provide clarification on what protection is provided by the FMLA, when FMLA applies and how to request FMLA.

3. *Prerequisites*

Employees who have worked for JimBuddy's Rec Shop for a total of 12 months or more and have worked at least 1250 hours over the previous 12 months.

4. *Responsibilities*

The Human Resources Manager will maintain records relating to time, attendance and eligibility. All documentation will be kept confidentially in the employee's personnel file.

5. *Procedure*

An eligible employee, may take up to 12 weeks of FMLA leave in any 12-month period for a variety of reasons including:

Serious Health Condition

FMLA leave may be taken to care for a spouse, child or parent who has a serious health condition or when the employee has a serious health condition.

The most common serious health conditions that qualify for FMLA leave are:

- Conditions requiring an overnight stay in a hospital or other medical care facility;
- Conditions that incapacitate the employee or the employee's family member for more than 3 consecutive days and have ongoing medical treatment.
 - This could be multiple appointments with a health care provider or a single appointment and follow-up care such as prescription medication;
 - Chronic conditions that cause occasional periods when the employee or the employee's family member are incapacitated and require treatment by a health care provider at least twice a year; and
- Pregnancy (including prenatal medical appointments, incapacity due to morning sickness, and medically required bed rest).

Military Family Leave

- FMLA provides certain military family leave entitlements.
- An employee may take FMLA leave for specified reasons related to certain military deployments.

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- An employee may also take up to 26 weeks of FMLA leave in a single 12- month period to care for a covered service member with a serious injury.

Expanding Family

- An employee may take FMLA leave for the birth of a child and to bond with the newborn child, or for the placement of a child for adoption or foster care and to bond with that child.
- Men and women have the same right to take FMLA leave to bond with their child but it must be taken within one year of the child's birth or placement.
- FMLA leave for the birth or placement of a child must be taken as a continuous block of leave unless the employer agrees to all intermittent leave (for example, a part-time schedule).
- If both the mother and father work for JimBuddy's Rec Shop, they are eligible to take a combined 12 weeks of FMLA leave for bonding.

BENEFITS OF FMLA

- FMLA leave provides up to 12 weeks of job-protected time off to deal with serious health issues.
- JimBuddy's must continue health insurance coverage, however the employee will be required to continue to make normal employee contribution payments.
- Employees who return to work prior to exhausting FMLA leave must be returned to the same job (or one nearly identical to it).
- Time off under the FMLA will not be held against the employee in employment actions such as hiring, promotions or discipline.

FMLA leave is unpaid leave, however **employees will be required to use any accrued leave (sick, vacation, etc.) while using FMLA leave.**

HOW FMLA LEAVE CAN BE TAKEN

- FMLA leave can be taken as a single block of time (up to 12 weeks)
- It can be taken in multiple, smaller blocks of time if medically necessary
 - For example, occasional absences due to a chronic medical condition.
- FMLA leave can be taken on a part-time basis if medically necessary.
 - For example, if after a surgery the employee needs to return to work for 4 hours a day or 3 days a week for a period of time.
 - If the employee needs multiple periods of leave for planned medical treatment, the employee must try to schedule the treatment at a time that minimizes the disruption to JimBuddy's.

REQUESTING FMLA LEAVE

To take FMLA leave, an employee must provide appropriate notice.

- An employee must notify Human Resources at least 30 days in advance when medical treatment is planned (such as a planned surgery or a pregnancy).
- If unable to give 30 days' notice, the employee must notify Human Resources of the need for leave as soon as the employee is made aware of the need.

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- When FMLA leave is needed unexpectedly, the employee must inform Human Resources as soon as possible and must follow JimBuddy's usual call-in procedures for being absent.

Though the employee does not have to specifically ask for FMLA leave, the employee must provide enough information with the request for leave that Human Resources can determine if the leave is covered by the FMLA.

- Once FMLA leave has been approved for a specific condition which requires subsequent treatment, all requests for leave for that treatment must mention either FMLA or that condition.
- It is not necessary for the employee to provide information regarding the diagnosis, however the employee must indicate that the requested leave is due to a FMLA covered condition.
 - For example, stating that the doctor has taken the employee out of work for 4 days.

REQUIRED COMMUNICATION

- The employee must inform Human Resources if the need for FMLA leave changes.
- Employee must provide periodic updates on their status and intent to return to work.
- The employee must give their supervisor reasonable notice (i.e. within two business days) of their ability to return to work.
- JimBuddy's must notify the employee if they are eligible for FMLA leave within 5 business days of their first request for leave. This notice will include the following:
 - If the employee is not eligible for FMLA leave, JimBuddy's will state at least one reason why;
 - If the employee is eligible for FMLA leave, JimBuddy's will include a notice of the employee's rights and responsibilities;
 - JimBuddy's has designated a 12-month rolling period which will be measured backward from the date when the FMLA leave starts and this time period will be included on the eligibility notice.
 - The employee will be required to provide medical certification from a health care provider.
 - **It is required for the employee to use accrued leave while on FMLA and submit bi-weekly timesheets reflecting use of leave.**
 - The employee has the right to maintain health benefits while on FMLA leave, however they will be required to continue to pay the employee's share of the total health care premium.
 - If the employee fails to pay their share of the premium, JimBuddy's will provide written notice stating that coverage will be canceled unless the premium is paid by a specific date.
 - Upon reinstatement, the employee will be restored to coverage under all employee benefit plans in which they were participating in the last regular job held.
 - Cancellation for nonpayment of premiums during FMLA leave does not affect restoration of benefits, but will result in nonpayment of claims incurred during the time that the required employee contributions were not paid.
- The employee has the right to return to their job or a similar one after the end of FMLA leave.
- Once JimBuddy's has the information necessary to determine if the leave is FMLA protected, the employee will be notified whether the requested leave will be designated as FMLA leave and, if possible, how much leave will be counted.

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- If JimBuddy's determines that the leave requested is not covered by FMLA, the employee will be notified of that decision.

FMLA LEAVE PROCESS

Medical Certification

- The employee has only 15 calendar days to provide the requested medical certification.
- The employee is responsible for the cost of getting the certification from a health care provider and for making sure that the certification is provided to JimBuddy's. Failure to provide the requested medical certification may result in the FMLA leave being denied.
- The medical certification must include:
 - Contact information for the health care provider;
 - When the serious health condition began;
 - How long the condition is expected to last;
 - Appropriate medical facts about the condition (which may include information on symptoms, hospitalization, doctors' visits, and referrals for treatment);
 - Whether the employee is unable to work or if the employee's family member is in need of care;
 - Whether the leave will be continuous or intermittent. If leave is needed a little bit at a time, the certification should include an estimate of how much time will be needed for each absence, how often absences will occur and information establishing the medical necessity for taking such intermittent leave.
 - If that necessary information is missing from the certification, the employee will be notified in writing of what additional information is needed. The employee has 7 calendar days to provide the missing information.
 - If JimBuddy's has concerns about the validity of the medical certification, a second opinion may be requested at the cost of JimBuddy's.
 - If the second opinion differs from the first, JimBuddy's may request a third opinion, but must cover the cost.
 - JimBuddy's may require an updated medical certification if the leave continues for longer than initially stated, the employee requests an extension of the leave, or if circumstances described by the previous certifications have changed significantly.
 - If JimBuddy's receives word that casts doubt upon the employee's stated reason for the absence or the continuing validity of the certification, JimBuddy's may require an updated medical certification.

Returning to Work

If an employee is capable of performing all essential functions of their last regular job, JimBuddy's will return the employee to their last regular job or a position equivalent to it.

- If the employee is not returned to the exact same job, the new position must:
 - Involve the same or substantially similar duties, responsibilities, and status;
 - Include the same general level of skill, effort, responsibility and authority;
 - Offer identical pay, including equivalent premium pay, overtime and bonus opportunities;
 - Offer identical benefits (such as life insurance, health insurance, sick leave, vacation, pensions, etc.); and

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- Offer the same general work schedule, and be at the same location.
- Refusing an offer of reinstatement to a similar position will be treated as a voluntary resignation.
- If the employee exhausts the FMLA leave entitlement and is unable to return to work, JimBuddy's is not required to restore the position.
- If an employee is unable to perform the essential functions of their last regular position at the end of the FMLA leave due to a disability, as defined by the Americans with Disabilities Act, JimBuddy's will investigate reasonable accommodations.
- An employee who fraudulently obtains FMLA leave is not protected by FMLA's job restoration or maintenance of health benefits provisions.
- If an employee is laid off during the course of taking FMLA leave and employment is terminated, the employee's rights to job restoration as dictated by FMLA regulation will cease upon the effective date of layoff. **The employee may apply for other vacant positions.**

JimBuddy's Rec Shop seeks to follow all laws, rules and regulations regarding the Family and Medical Leave Act. However, if an employee believes their rights have been violated, they should contact the Department of Labor.

- The U.S. Department of Labor's Wage and Hour Division (WHD) is responsible for administering and enforcing the Family and Medical Leave Act for most employees and the WHD can be reached at 1-866-487-9243.
- JimBuddy's Rec Shop will not retaliate against any employee for filing a complaint, cooperating with the WHD or bringing a private action to court.

6. Reporting

The Human Resources Manager will provide and maintain the proper documentation.

7. Definitions

Parent – a biological, adoptive, step or foster father or mother, or any other individual who stood in loco parentis to the employee when the employee was a son or daughter. This term does not include parents "in law".

Son or Daughter – a biological, adopted, or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis, who is either under age 18, or age 18 or older and "incapable of self-care because of a mental or physical disability" at the time that FMLA is to commence.

In Loco Parentis – a person with day-to-day responsibilities to care for and financially support a child. Employees who have no biological or legal relationship with a child may nonetheless stand in loco parentis to the child and be entitled to receive FMLA leave.

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Standard Operating Procedure GRIEVANCES

1. Purpose

The purpose of this SOP is to help employees understand the procedure for filing grievances.

2. Scope

This SOP is for all employees.

3. Prerequisites

All employees must contact the Human Resources Department to obtain a grievance form and procedural checklist. The checklist for both HR and the employee require that:

- HR communicates the procedure;
- HR will investigate all grievances promptly;
- HR will treat all employees who file grievances equally;
- HR will reserve confidentiality at any stage of the process;
- HR will resolve all grievances when possible; and
- HR will respect its no-retaliation policy when employees file grievances with the company or external agencies (e.g. equal employment opportunity committee).

4. Responsibilities

It is the responsibility of the Human Resources Department to act on all grievances, including forwarding them to the Director of Operations.

5. Procedure

The Human Resources Department will follow the procedures below:

1. Ask employee to fill out a grievance form.
2. Talk with the employee to ensure the matter is understood completely.
3. Provide the employee who faces allegations with a copy of the grievance.
4. Organize mediation procedures (e.g. arranging a formal meeting).
5. Investigate the matter or ask the help of an investigator when needed.
6. Keep employees informed throughout the process.
7. Communicate the formal decision to all employees involved.
8. Take actions to ensure the formal decision is adhered to.
9. Deal with the appeals by gathering more information and investigating further.
10. Keep accurate records.

This procedure may vary according to the nature of a grievance. For example, if an employee is found guilty of racial discrimination, the company will begin disciplinary and/or termination procedures.

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6. References

Refer to the employee handbook regarding workplace rules. Human Resources maintains a set of internal guidelines for discipline, warnings and termination, if merited. Refer to SOP Dismissal Policy which is compliant with 935 CMR 500.105(1)(l).

7. Reporting

All grievances must be copied and sent to the Director of Operations.

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Standard Operating Procedure OBSERVED HOLIDAYS

1. Purpose

To explain the policy for observed holidays.

2. Scope

This policy applies to all employees.

3. Policy Statement

JimBuddy's Rec Shop observes seven federal holidays. Eligible employees are excused from work and receive pay for these days.

- a. New Year's Day
- b. Memorial Day
- c. Easter
- d. Independence Day
- e. Labor Day
- f. Thanksgiving Day
- g. Christmas Day

Managers are encouraged to reasonably accommodate an employee's request to observe a bona fide religious observance or practice not included in the list above by one of the following methods:

- a. Changing the employee's work schedule.
- b. Permitting the employee to take accrued time off.

Employees that work on a holiday, as listed above, will receive time-and-one-half compensation, for those hours worked.

4. Responsibilities

The payroll specialist will hold responsibility for employees to get paid the proper compensation. Managers will be responsible to handling special requests from employees.

5. Procedure

Staff in the following Employee Status categories in Human Resources Management System on the day that the JimBuddy's Inc. observes the holiday do not receive pay for the holiday:

1. Leave of Absence; a 30 day or more absence without pay under the LOA policy
2. Terminated, Retired, or Deceased.

Employees hired or returning from a leave of absence on the day following a holiday do not receive pay for the holiday.

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Appointments and terminations shall not be made effective for the day on which a holiday is observed.

Compensation for Eligible Employees

Salaried employees, when observed holidays are worked, is as follows:

1. Salaried Staff who work on a holiday receive equivalent time off.
 - a. Salaried employees, who are not eligible for overtime, receive time off to be used later on a day-for-day basis, regardless of the number of hours worked on the holiday.
 - b. Salaried employees who receive time off as compensation for a worked holiday must select a time-off date that is mutually agreeable with the Director of Operations and which does not create an undue hardship on the department.
 - c. Salaried employees must use the time off by the end of the last full pay period in December of the next calendar year or it will be forfeited.

Full-Time employees

1. Entitled to receive holiday pay in addition to their regular compensation after they have been employed for more than three months on a full-time basis.

6. *References*

Refer to us.gov for a list of federal holidays. A list will be posted in an employee common area. Staffing schedules will be posted two weeks in advance.

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Standard Operating Procedure PERFORMANCE EVALUATIONS

1. Purpose

The performance evaluation provides a means for discussing, planning and reviewing the performance of each employee.

- Help employees clearly define and understand their responsibilities.
- Provide criteria by which employee's performance will be evaluated.
- Suggest ways in which employees can improve performance.
- Identify employees with potential for advancement within the establishment.
- Help managers distribute and achieve departmental goals.

2. Scope

The scope of this SOP is for all employees.

3. Prerequisites

Employees must pass a probationary point and will be given performance evaluations twice per year.

4. Responsibilities

It is the responsibility of the managers to ensure that all employees are reviewed on a timely and fair basis, and all performance evaluations are made a permanent part of each employee's personnel file.

5. Procedure

Periodic Performance Evaluations and Disciplinary Actions:

Performance evaluations will occur bi-annually. The performance evaluation will be written and maintained in the employee's personnel file. This information will be used to determine compensation and pay increases as well as disciplinary actions and grounds for dismissal.

6. References

Each employee will receive a copy of their job description. A copy of the Performance Evaluation form can be found in the employee handbook. Record keeping in compliance with 935 CMR 500.105(9).

7. Reporting

All performance evaluations are sent to the Human Resources Manager and also placed in the respective employee's personnel file.

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Standard Operating Procedure PERSONNEL FILES

1. Purpose

The purpose of this SOP is to explain the process for storage, updating and backup of personnel files and the types of items kept in these files.

2. Scope

The scope of this SOP is for all employees.

3. Prerequisites

Employees who have access to personnel files must have been vetted to do so, and must follow all security protocols and specific training to ensure their security and confidentiality.

4. Responsibilities

It is the responsibility of the Human Resources Manager to ensure all records are properly annotated and securely stored.

5. Procedure

Attendance at formal training classes will be mandatory and documented. Additionally, specific training on SOPs, including applicable laws and regulations, will be signed off by both the employee and a director. This documentation will be retained in the employee's personnel file so that it can be audited by the compliance division. Human resource files and training documentation will be maintained in hard copy and an electronic environment for ease of interaction, retention, and inspection by the Commission. Employment contracts will specify attendance at training classes, and in the event the employee does not complete the required training in the specified time, this would be grounds restricting their hours until the training is complete and ultimately dismissal. Personnel files contain all information related to the hiring and/or employment of any individual who is or was employed by JimBuddy's Rec Shop.

Employee records to include, but not limited to:

- a. job description or employment contract that includes duties, authority, responsibilities, qualifications and supervision;
- b. organizational charts consistent with job descriptions;
- c. personnel record for each employee;
 - a. all records shall be maintained for at least 12 months after termination of the employee's affiliation with JimBuddy's Rec Shop.
- d. all materials submitted to the Commission as per 935 CMR 500.030(2);
- e. documentation of verification of references;
- f. documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the employee indicating the date, time and place the training was received, topics discussed and the name and title of the presenters.
- g. performance evaluations;

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- h. record of any disciplinary action taken;
- i. notice of completed responsible vendor and eight-hour related duty training;
- j. all background check reports obtained in accordance with 935 CMR 500.030.

6. References

Refer to additional SOPs in the Human Resources section other documentation that may become a part of all employee's personnel files. Regulations set forth under 935 CMR 500.030(2), 935 CMR 500.105(1) and 935 CMR 500.105(9)(d).

7. Reporting

All personnel files are maintained by the Human Resources Manager. The Human Resources Manager reports all appropriate information to payroll, the health insurer, and to other regulatory bodies entitled to receive employment information. Records are available to the Commission, upon request.

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**Standard Operating Procedure
PROBATIONARY PERIOD FOR NEW EMPLOYEES**

1. Purpose

The purpose of this SOP is to explain the probation period for new employees.

2. Scope

This SOP is intended for all new hires.

3. Prerequisites

All employees need to successfully pass the background check. Employees must attend the mandatory training sessions during their 90-day probationary period. After completing all the training, including the Responsible Vendor Training, employees will be mentored by managers. During the probationary period, employees will not work alone. Managers will provide a comprehensive evaluation every 30 days. Upon successful completion and satisfactory reviews for the first 90 days, the individual will then be considered an official employee.

4. Responsibilities

It is the responsibility of the Human Resources Manager to keep the managers aware of the start and end of the probationary period for each new hired employee. The Compliance Manager will monitor the completion of trainings.

5. Procedure

Upon hiring a new employee, a personnel file is created. Within the file, all dates are recorded such as the date hired, training classes and the probationary period. Upon successful completion of the probationary period, the employee will be given a performance review and assigned responsibilities. The Human Resources Manager will maintain an online calendar for managers to allow them to see when probationary periods will be finished for each new hire.

6. References

Refer to the employee handbook, which further outlines the terms of employment. Refer to SOP Personnel Files for information to be kept in these files in compliance with 935 CMR 500.105(9). Refer to Responsible Vendor Training as required per 935 CMR 500.105(2)(b).

7. Reporting

All probationary period employees will be added to the Human Resources calendar, which is password protected and provided to managers.

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Standard Operating Procedure Sexual Harassment

1. *Purpose*

JimBuddy's Rec Shop is committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. JimBuddy's Rec Shop is also committed to promote a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

We will not tolerate any form of sexual harassment and are committed to take all necessary steps to ensure that our employees are not subjected to any form of harassment.

2. *Scope*

This policy applies to all categories of employees of JimBuddy's Rec Shop, including management and subcontractors. JimBuddy's will not tolerate sexual harassment, if engaged in by customers, suppliers or any other business associates. The workplace includes:

1. All offices or other premises where JimBuddy's business is conducted;
2. All company-related activities performed at any other site away from the establishment;
3. Any social, business or other functions where conduct or comments may have an adverse impact on the workplace or workplace relations.

3. *Prerequisites*

All employees will receive training on proper ways to conduct themselves and steps to taken if harassed.

4. *Responsibilities*

All employees of JimBuddy's have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

5. *Procedure*

JimBuddy's is committed to providing a supportive environment in which to resolve concerns of sexual harassment as under:

A. **Informal Resolution Options**

- a. When an incident of sexual harassment occurs, the victim of such conduct can communicate his/her disapproval and objections immediately to the harasser and request the harasser to behave decently.
- b. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, he/she can bring his/her concern to the attention of the Human Resources Manager. The Human Resources Manager will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

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B. Complaints

- a. Any employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Human Resources Manager. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose his/her name and department he/she is working in, to enable the Human Resources Manager to contact his/her and take the matter forward.
- b. The Human Resources Manager will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not mean an offence of Sexual Harassment, the manager will record this finding with reasons and communicate the same to the complainant.
- c. If the Human Resource Manager determines that the allegations constitute an act of sexual harassment, the manager will proceed to investigate the allegation.
- d. Where such conduct on the part of the accused amounts to a specific offence under the law, JimBuddy's shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- e. The Human Resources Manager shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Director of Operations as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Director of Operations will ensure corrective action on the recommendations of the Human Resources Manager and keep the complainant informed of the same.
 - i. Corrective action may include any of the following:
 1. Formal apology,
 2. Counseling,
 3. Written warning to perpetrator and a copy of it maintained in the employee's personnel file,
 4. Change of work assignment for either the perpetrator or the victim,
 5. Suspension or termination of services of the employee found guilty of the offence.
- f. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

Confidentiality

JimBuddy's understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

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Access to reports and documents

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by JimBuddy's except where disclosure is required under disciplinary or other remedial processes.

Protection to complainant / victim

JimBuddy's is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

JimBuddy's will ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

Conclusion

In conclusion, JimBuddy's reiterates its commitment to providing its employees, a workplace free from harassment / discrimination and where every employee is treated with dignity and respect.

6. Reporting

The Human Resources Manager is responsible for:

- Investigating every formal written complaint of sexual harassment.
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- Discouraging and preventing employment related sexual harassment.

7. Definitions

Definition of Sexual Harassment

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

1. Unwelcome sexual advances (verbal, written or physical),
2. Demand or request for sexual favors,
3. Any other type of sexually-oriented conduct,
4. Verbal abuse or 'joking' that is sex-oriented,
5. Any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

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Standard Operating Procedure TELEPHONE ETIQUETTE

1. Purpose

The purpose of this policy is to establish telephone customer service communications expectations.

2. Scope

Whether your primary responsibilities include answering the phone, or you are simply lending a hand when needed, good telephone etiquette is a must. We want to ensure that the impression of our facility is a positive one. All voice messages left during off-hours, will be returned the following morning.

3. Prerequisites

Training is required before answering the telephone. Role-play scenarios will be part of the training.

4. Responsibilities

The receptionist will be the main person for answering the telephone. The receptionist will also return any messages left during the previous night. When the receptionist is unavailable, either a manager or another trained employee will assist.

5. Procedure

Answering the Telephone

1. Never walk away from a customer to answer the telephone.
2. Answer all incoming calls before the third ring.
3. When answering the telephone, be warm, enthusiastic, and professional. Smile and speak clearly.
4. Each call should be answered using the same greeting. That greeting is, "Thank you for calling JimBuddy's, this is (employee's name), how may I help you?"
5. Do not use speaker phone.
6. If a caller must be put on hold, always ask them permission to do so. For example: "May I place you on hold?" If the answer is no, then apologize to the guest and ask if you can get a telephone number to call them back as soon as possible.
7. When placing a guest on hold, do not allow them to remain on hold for longer than 30 seconds. If this is not possible, inform the guest you might be a few minutes and ask if they prefer a call back. If so, obtain the telephone number and repeat the number to avoid errors. Additionally, *always* thank the guest for holding.
8. Take messages when necessary. Be complete and accurate using the proper telephone message pad. Make sure the message gets to the intended recipient within a reasonable amount of time.
9. Avoid using slang or buzzwords. Instead of saying "ok" or "no problem", for instance, say "Certainly" or "Very well". Both voice and vocabulary should be positive. For example, rather than saying, "I don't know", say, "Let me find out".

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10. If you receive a telephone call for a manager, please ask the caller's name and what the call is regarding. Next, inform the manager of the telephone call.
11. Personal calls should be limited to lunch and break times. If a personal call must be made, it is not permitted to do so in the presence of a guest. Any personal calls must be terminated upon the arrival of a guest. This includes text messages as well.

6. References

A copy of the Telephone Etiquette policy, with sample words and phrases, can be found in the handbook.

7. Reporting

All calls that need additional assistance shall be handled by a manager. At the end of the receptionist shift, any messages that have not yet been addressed, will be turned over to a manager.

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Standard Operating Procedure TIME OFF PROCEDURES

1. Purpose

This document establishes guidelines for requesting and taking time off.

2. Scope

This policy applies to all employees.

3. Prerequisites

Employees cannot request vacation or any other scheduled time off during black-out dates. A manager needs to approve all request for time off prior to taking time off. The Time Off Request form needs to be completed, submitted and approved before taking any time off.

4. Responsibilities

All employees must use the JimBuddy's Time Off Request form in advance when requesting vacation or any other scheduled time off. Forms can be obtained from a manager.

5. Procedure

Requests for scheduling vacation shall be submitted in writing at least 30 days in advance and approved by a manager. If the employee is unable to provide 30-day notice, the employee will need to get special approval from the Director of Operations. Vacation requests are approved in the order they are submitted.

Requests for time off will not be approved if the dates fall in the range of the black-out dates. Black-out dates will be posted in an employee common area. Black-out dates are during the busy season, for special events and trainings.

When an employee is too sick to work, the employee should contact a manager as soon as possible. Employees must promptly notify a manager when leaving work early due to illness.

If an employee does not show for work, and has not called out, the employee will be terminated. There are exceptions to this rule. Each situation will be reviewed by a Manager to determine if there is a legitimate reason.

Cancellation or Revision of Time Off Request form shall be completed as follows:

- Obtain old Time Off Request form and indicate change to request by marking document as "Cancelled" or "Revised (on top right-hand corner) and indicate date change and/or amount of time off requested where appropriate.
- Forward Revised or Cancelled request to a Manager so they can notate change by initialing the revised Time Off Request Form.

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6. References

List of black out dates will be posted in an employee common area. All approved submitted requests for time off will be kept in the employee's personnel file. Record keeping in compliance with 935 CMR 500.105(9)(d).

7. Reporting

Final decisions, whether approval or denial, will be made by a manager. The manager will submit approved requests to Human Resources.

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Standard Operating Procedure VACATION POLICY

1. Purpose

To describe a well-enforced policy to prevent confusion and help employees understand what steps need to be followed in order to accrue and take time off.

2. Scope

This SOP is intended for full-time and salaried employees.

3. Prerequisites

Employees must work 40 hours per week or salaried employees that have been employed for at least one year.

4. Responsibilities

Full-time employees must submit a Time Off Request form to a manager. The manager will approve or deny the request and pass the request form to Human Resources. Salaried employees will submit a Time Off Request form directly to Human Resources.

5. Procedure

Vacation time will not be accrued during unpaid leaves of absence.

It is the policy of JimBuddy's Rec Shop to provide each full-time employee with vacation time on a periodic basis. The amount of vacation to which an employee becomes entitled is determined by the employee's length of service as of his or her employment anniversary date. For full-time employees, vacation accrues as follows:

1. At the end of the first year of service, one week (40 hours) of vacation. Vacation hours are accrued at 3.33 hours per month.
2. Two years of more but less than five years of service, two weeks (80 hours) of vacation per year. Vacation hours are accrued at 6.66 hours per month.
3. Five years or more but less than ten years of service, three weeks (120 hours) of vacation per year. Vacation hours are accrued at 10 hours per month.
4. Ten years or more of service, four weeks (160 hours) of vacation per year. Vacation hours are accrued at 13.33 hours per month.

Vacation days must be used by the end of the calendar year. Any earned vacation time not used will be forfeited. If an employee is unable to use all accrued vacation time due to black-out dates or other unforeseen reasons, a manager may approve to allow the unused vacation days to be used in the next calendar year. This approval needs to be in writing.

In an effort to accommodate the desires of our employees who would like to take their vacations early in the year, employees will be permitted to "borrow" against the vacation they expect to accrue over the course of a vacation year. It should be understood, however that if the employee's employment with JimBuddy's is terminated for any reason prior to the time that the employee has accumulated the number

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of vacation days taken during the vacation year, the employee will be responsible for reimbursing JimBuddy's for the amount of used but unaccrued vacation. At the time the employee "borrows" against the unaccrued vacation, the employee will be expected to execute a written authorization that would allow JimBuddy's to deduct the amount of used but unaccrued vacation from their final paycheck, should that be necessary.

A manager should be notified as far in advance as possible of the time you wish to take your vacation. Requests for scheduled vacation must be submitted in writing. Requests for unscheduled vacation must comply with the JimBuddy's Time Off procedures. To ensure that our staffing and operational needs are met at all times, JimBuddy's reserves the right to grant vacation requests at its discretion.

All regular, full-time employees and regular, part-time employees are eligible upon hire for Unpaid Time Off. In cases of Unpaid Time Off that is requested for personal reasons, an employee's accrued Vacation Leave, Sick Leave and available Personal Days must be fully used before the Unpaid Time Off commences. In cases of Unpaid Time Off that is requested for medical reasons, an employee's accrued Vacation Leave, accrued Sick Leave, available Personal Days must be fully used before the Unpaid Time Off commences.

6. References

Refer to SOP Time Off Procedures and the company handbook. Record keeping in compliance with 935 CMR 500.105(9)(d).

7. Reporting

Management will approve or deny request for vacation time. Human Resources will maintain the scheduling. All documentation relating to vacation requests will be kept in the employee's personnel file.

DIVERSITY PLAN

Goals

JimBuddy's Rec Shop goal is to promote equity among the following demographics: minorities, women, veterans, people with disabilities and LGBTQ+ individuals. This plan adheres to the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of Marijuana Establishments. Any actions taken, or programs instituted, by JimBuddy's will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

The goals of the JimBuddy's Rec Shop Diversity Policy are:

1. Provide access and assistance to individuals from minorities, women, veterans, people with disabilities and LGBTQ+ in relation to finding employment in the adult-use marijuana industry, which includes JimBuddy's Rec Shop. JimBuddy's will hire 10% of their staff from this group of individuals.
2. Attract at least 50% of applicants from the above listed demographics for available positions.
3. To hire 50% of its staff that are minorities, persons with disabilities and women.
4. Empower approximately 3 to 5 local entrepreneurs from the above listed demographics by participating in educational and motivational programs.

Programs

JimBuddy's Rec Shop will participate with the following programs:

1. New England Veterans Alliance (NEVA) to post job listings as well as find potential employees. JimBuddy's will also use this platform to communicate with veterans informing them of upcoming training and educational seminars.
2. JimBuddy's shall also post job listing weekly on our website and monthly on MassLive stating that JimBuddy's is specifically looking for women, minorities, or persons with disabilities to work in the establishment.
3. JimBuddy's will coordinate with C3RN and NEVA to host or participate in an annual seminar to empower local entrepreneurs. The program will be interactive. We will listen to ideas and insights while reinforcing with positive feedback.
 - a. Advertise in advance to gain the most attendees
 - b. Work with the venue to determine the maximum number of attendees (approximately between 10-30)
 - i. The seminars will be at least one hour but no longer than two hours long. This will depend on the attendee's participation.
 - ii. Allow additional time for networking.
 - c. Tell our story
 - i. How we got started without investors.
 - ii. How our previous jobs have prepared us for this challenge.
 - iii. What we have currently accomplished within this process.
 - d. Teach others how to take initiative action
 - i. Read the regulations.
 - ii. The importance of finding a good location.
 - iii. Write a business plan.
 - iv. Networking (e.g. CannaCon, NECANN, local meetings and seminars, newsletters).
 - v. Provide our contact information for future questions and business dealings.

Measurements

Progress will be measured as follows:

1. Management will conduct an internal review and evaluation on an annual basis, acknowledging the progress of the plan and documented upon renewal of one year from provisional licensure and each year after, of each program and partnership that JimBuddy's participates with and will track the key metrics of their productivity including but not limited to:
 - a. Employees hired from each separate program;
 - b. Number of applicants received from each program;
 - c. Promotions provided to applicants hired from within each program.
2. Actively working with NEVA to:
 - a. Track the number of veterans that apply for positions at JimBuddy's.
 - b. Track the number of veteran attendees that attend seminars held by these programs.
 - i. Determine if additional seminars would be more beneficial
 - ii. Collect input and feedback from attendees
3. The hiring team will review all applications submitted and the number of applications that were interviewed from minorities, women, veterans, people with disabilities and LGBTQ+ individuals.

- a. Confirm we are reaching out to the desired demographics and collecting resumes from minorities, women, veterans, people with disabilities and LGBTQ+.
 - b. Provide flexible work schedules
 - c. Design motivation programs to mentor current employees for growth and retention.
4. Partnering with C3RN, Holyoke Community College, NEVA, and other groups, JimBuddy's will host or participate in an annual seminar to empower local entrepreneurs:
- a. Attendees
 - i. Track the number that attend
 - ii. Track the diversity of the group attending
 - iii. Feedback from the meeting
 1. How often would they like these types of seminars;
 2. Best times to have the seminars;
 3. Future topics to discuss.
 - b. Follow ups
 - i. Track the number of comments received after the seminar;
 - ii. Number of attendees that reached out for assistance.
 - c. Feedback
 - i. Request feedback from the participating groups (HCC, C3RN, etc);
 - ii. Review feedback. Track progress.

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Standard Operating Procedure QUALIFICATIONS & TRAININGS

1. Purpose

JimBuddy's Rec Shop is an Equal Opportunity Employer that promotes the diverse talent of people from all backgrounds. All individuals must undergo and pass the training program prior to active employment and being assigned scheduled hours. Additionally, employees must take recurrent training.

2. Scope

The scope of this SOP is to provide the qualifications for employment and explain the employee training curriculum, which shall provide critical procedures and instruction to ensure all systems are in place to dispense cannabis safely. These systems also ensure that every employee understands how to implement these systems accurately.

3. Prerequisites

Individuals must be at least 21 years of age and pass the criminal background check as required under 935 CMR 500.030. Each employee is expected to acquaint themselves with performance criteria for their particular job and with all rules, procedures, and standards of conduct established by JimBuddy's Rec Shop. Employees will go through a 90-day probationary period. Employees must complete all required trainings for their positions within 90 days of hire.

4. Responsibilities

The Director of Operations and the certified trainer are responsible for ensuring the attendance and requisite test of employee knowledge before allowing the individual to be placed on the work schedule. All references will be verified by the Human Resources Manager.

5. Procedure

TRAININGS

JimBuddy's shall ensure that all marijuana establishment agents complete training prior to performing job functions. In addition to the Company's mandatory training on security, standard operating procedures, and other standard requirements, JimBuddy's will provide specialized training for each position. Training and education for all personnel will be the cornerstone of the operations success through dedicated programs for employees so they are prepared to consistently operate at the highest industry standards.

Responsible Vendor Program

Trainings shall be tailored to the roles and responsibilities of the job function and shall include a Responsible Vendor Training Program as set under 935 CMR 500.105(2). At a minimum, staff shall receive eight hours of on-going training annually. Certification Training Program standards include, but not limited to:

1. The program shall include at least two hours of instruction time;

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2. The program shall be taught in a real-time, interactive classroom setting where the instructor is able to verify the identification of each individual attending the program and certify completion of the program by the individual identified;
3. The program shall provide written documentation of attendance and successful passage of a test on the knowledge of the required curriculum for each attendee;
4. Attendees who can speak and write English must successfully pass a written test with a score of 70% or better; and
5. Attendees who cannot speak or write English may be offered a verbal test, provided that the same questions are given as are on the written test and the results of the verbal test are documented with a passing score of 70% or better.

Certification Training Class Core Curriculum

- a. Discussion concerning cannabis's effect on the human body. Training shall include:
 - i. Cannabis's physical effects based on type of cannabis product;
 - ii. Amount of time to feel impairment;
 - iii. Visible signs of impairment; and
 - iv. Recognizing the signs of impairment.
- b. Diversion prevention and prevention of sales to minors, including best practices;
- c. Compliance with all tracking requirements;
- d. Acceptable forms of identification. Training shall include:
 - i. How to properly check identification;
 - ii. Spotting false identification
 - iii. Medical registration cards issued by the DPH;
 - iv. Provisions for confiscating fraudulent identifications; and
 - v. Common mistakes made in verification.
- e. Other key state laws and rules affecting owners, managers, and employees, which shall include:
 - i. Local and state licensing and enforcement;
 - ii. Incident and notification requirements;
 - iii. Administrative and criminal liability;
 - iv. License sanctions and court sanctions;
 - v. Waste disposal;
 - vi. Health and safety standards;
 - vii. Patrons prohibited from bringing cannabis onto licensed premises;
 - viii. Permitted hours of sale;
 - ix. Conduct of establishment;
 - x. Permitting inspections by state and local licensing and enforcement authorities;
 - xi. Licensee responsibilities for activities occurring within licensed premises;
 - xii. Maintenance of records;
 - xiii. Privacy issues;
 - xiv. Prohibited purchases and practices;
- f. Such other areas of training determined by the Commission to be included in a responsible vendor training program.

Additional Training

- Standard Operating Procedures (SOP's)
- Security procedures including training on safety and emergency procedures such as medical emergency, fire, security and threatening event
- Inventory control and record keeping

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- Log sheets and templates
- Annual training to update and reinforce knowledge in the above areas

Trainings will be provided by our corporate trainer, along with selected 3rd party security vendors, Metrc Seed-to-Sale Software control systems and POS vendors. Training will include an extensive hands-on approach and the use of Standard Operating Procedures and various other materials and methods as deemed appropriate. JimBuddy's will utilize targeted training materials and programs for different operations. Ongoing and cross functional training will be continued as operations commence. Employees will be required to read and agree to comply with the company Employee Handbook, SOPs and other materials management deems necessary prior to commencing work. Training and education will be all-encompassing, covering regulatory compliance, seed-to-sale tracking, customer service and advocacy, point of sale training, dispensing, security and diversion prevention, health and safety protocols, sanitations, and organizational functioning within a vertically integrated operation.

Registration Card

The Commission shall issue a registration card to each marijuana establishment agent determined to be suitable for registration. All such individuals shall:

- be 21 years of age or older;
- not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of another state, the United States or foreign jurisdiction, or a military, territorial, or Native American tribal authority; and
- be determined suitable for registration consistent with the provisions of 935 CMR 500.800 and 500.802.

A registration card shall be valid for one year from the date of issue, and may be renewed on an annual basis upon a determination by the Commission that the applicant for renewal continues to be suitable for registration.

The registration card shall be worn at all times while at the marijuana establishment.

QUALIFICATIONS

JimBuddy's is looking for professional, hardworking, outgoing and knowledgeable individuals who are interested in joining our team and are who willing to go above and beyond for our great customers. Our goal is to provide the best customer service available. Individuals must have the ability to maintain a positive attitude in a fast paced and always evolving work environment. Interpersonal skills are a must. Being a team player is required. A desire to help others, has the ability to self-educate and retain knowledge on the products we carry is also a must.

Minimum Qualification Required for All Positions

- At least 21 years of age
- Ability to pass the extensive background check
- Must be and remain compliant with any and all legal or company regulations for working in the industry
- Have reliable transportation
- Ability to work nights, holidays and weekends.

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- Outgoing personality, excellent communication and interpersonal skills
- Ability to quickly learn procedures and acquire product knowledge
- Task oriented with the ability to finish assigned projects
- High level of ownership, accountability and initiative
- Must be able to stand and walk for long periods.
- Basic computer skills

Additional Qualifications for Specific Positions

Dispensary Manager

- 3-5 years in progressively responsible retail experience, including at least three years in a management position
- Ability to manage a team of staff members at a time during normal business hours in a fast-paced environment
- Experience in inventory management and reconciliation
- Understanding of working in heavily regulated environment
- Excellent oral and written communication skills
- Proficient computing skills
- Innate desire to achieve success and a work ethic to match
- Ability to critically think and problem solve without direction
- High level of integrity

Assistant Dispensary Manager

- 2+ years of experience in a management role
- 3+ years of experience in a retail/customer service environment
- Proficiency computing skills
- Strong problem-solving skills including anticipatory thinking and the ability to work well under pressure while maintaining a calm composure
- Demonstrated ability to work comfortably and effectively within a diverse, multicultural, multigenerational environment

Dispensary Agent / Budtender

- Working knowledge of Leaf Logic point of sale system is preferred
- High school diploma or equivalent
- Bilingual is a plus
- Prefer retail or customer service experience
- Cash handling experience
- Must have salesmanship! Being able to interpret and guide the customer interactions.

Head of Security

- Active military, law enforcement or retired
- Criminal Justice Degree
- Ability to implement security policies, including personal safety and crime prevention techniques;
- High degree of professionalism and leadership to be able to work with senior leadership and present findings

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- Must be able to maintain confidentiality.
- Demonstrate ability to quickly adapt; maintain focus and a high degree of accuracy while working with complex data
- Exude excellent judgment and be known as a critical thinker.
- Be credible and with strong reputation for honesty and integrity.
- Demonstrates professionalism and composure and prioritizes work efficiently.
- An excellent communicator with strong interpersonal skills.
- Certified CPR, First Aid instructor and training in law enforcement techniques desired.
- Working knowledge of local laws, investigation methods, OSHA requirements and fire codes and life safety codes also preferred.

Security Guard

- Two years prior experience in security, law enforcement or related field
- One year or more prior experience in customer service
- High school diploma or GED
- Basic computer operating skills
- Ability to communicate in English effectively both verbally and written, obey/enforce the laws of the Commonwealth of Massachusetts

Human Resources Manager

- Knowledge and experience in employment law, compensation, organizational planning, recruitment, organization development, employee relations, safety, employee engagement and employee development.
- Excellent written and spoken communication skills.
- Demonstrated ability to serve as a knowledgeable resource to the executive management team that provides overall company leadership and direction.
- Excellent computer skills in a Microsoft Windows environment. Must include knowledge of Excel and skills in Human Resources Information Systems (HRIS).
- General knowledge of various employment laws and practices and experience working within the cannabis industry.
- Experience in the administration of benefits and compensation programs and other Human Resources recognition and engagement programs and processes.
- Evidence of the ability to practice and coach organization managers in the practice of a high level of confidentiality.
- Excellent organizational management skills

6. References

Reference SOP Background Checks and requirements as set forth under 935 CMR 500.030. Age requirements set forth by the City of Chicopee Adult Use of Marijuana (Recreational) Chapter 275, Section 72 and State regulations 935 CMR 500.030. Reference Record Keeping SOP for requirements for record retention and 935 CMR 500.105(9)(d). Background requirements as set forth under 935 CMR 500.030. Regulations set forth under 935 CMR 500.105(I).

Please refer to job descriptions and original training material for further understanding of this SOP.

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SOP Owner	James Robinson	Approval	

7. Reporting

Responsible vendor training program documentation shall be maintained for four years. The Responsible Vendor Training Program provider shall maintain its training records at its principal place of business during the applicable year and for the following three years. These records shall be available for inspection by the Commission and any other applicable licensing authority upon request during normal business hours.

The Director of Operations shall notify the Commission no more than one business day after a JimBuddy's employee ceases to be associated with the Marijuana Establishment. The registration shall be immediately void when the agent is no longer associated with the establishment.

All training must be documented with attendance taken and a copy of the content presented. The results of any training quizzes or exams must be placed in the employee's personnel file.