



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR284537
Original Issued Date: 08/09/2022
Issued Date: 08/09/2022
Expiration Date: 08/09/2023

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: ReLeaf Alternative Natick, Inc.

Phone Number: 508-922-3543 Email Address: kerryb@releafma.com

Business Address 1: 291 Worcester Street

Business Address 2:

Business City: Natick

Business State: MA

Business Zip Code: 01760

Mailing Address 1: 323 Manley Street

Mailing Address 2:

Mailing City: West Bridgewater

Mailing State: MA

Mailing Zip Code: 02379

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Woman-Owned Business

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: 27

Percentage Of Control: 33

Role: Owner / Partner

Other Role:

First Name: Conor

Last Name: McLaughlin Suffix:

Gender: Male

User Defined Gender:

Date generated: 09/01/2022

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: 60 Percentage Of Control: 67

Role: Owner / Partner Other Role:

First Name: Kerry Last Name: Bourne Suffix:

Gender: Female User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 3

Percentage Of Ownership: 10 Percentage Of Control:

Role: Owner / Partner Other Role:

First Name: Brian Last Name: McLaughlin Suffix: Jr.

Gender: Male User Defined Gender:

What is this person's race or ethnicity?: White (German, Irish, English, Italian, Polish, French)

Specify Race or Ethnicity:

Person with Direct or Indirect Authority 4

Percentage Of Ownership: 3 Percentage Of Control: 33

Role: Director Other Role:

First Name: Helena Last Name: Evans 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

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: Releaf Alternative Inc. Entity DBA:

Email: conorm@releafma.com Phone: 508-942-1960

Address 1: 321 School Street Address 2:

City: Mansfield State: MA Zip Code: 02048

Types of Capital: Debt Other Type of Capital: Total Value of Capital Provided: \$100000 Percentage of Initial Capital: 100

Capital Attestation: Yes

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Date generated: 09/01/2022

Individual 1

First Name: Conor **Last Name:** McLaughlin **Suffix:**
Marijuana Establishment Name: ReLeaf Alternative, Inc. **Business Type:** Marijuana Retailer
Marijuana Establishment City: Mansfield **Marijuana Establishment State:** MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 291 Worcester Street
Establishment Address 2:
Establishment City: Natick **Establishment Zip Code:** 01760
Approximate square footage of the establishment: 2926 **How many abutters does this property have?:** 15
Have all property abutters been notified of the intent to open a Marijuana Establishment at this address?: Yes

HOST COMMUNITY INFORMATION

Host Community Documentation:

Document Category	Document Name	Type	ID	Upload Date
Certification of Host Community Agreement	ReLeaf Alternative Natick, Inc. - Executed HCA Certification Form.pdf	pdf	61fb0ae9ea5b88086e770a47	02/02/2022
Plan to Remain Compliant with Local Zoning	ReLeaf Alternative Natick_Plan to Remain Compliant with Local Zoning.pdf	pdf	621fc9b7440815076f413d54	03/02/2022
Community Outreach Meeting Documentation	reLeaf Alternative - Natick Community Outreach Meeting Attestation Form (Executed).pdf	pdf	62212b580034de07b0946c6c	03/03/2022

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	ReLeaf Natick_Positive Impact Plan.pdf	pdf	624225eec91bef00094d2b26	03/28/2022

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Owner / Partner **Other Role:**
First Name: Conor **Last Name:** McLaughlin **Suffix:**
RMD Association: Not associated with an RMD
Background Question: yes

Individual Background Information 2

Role: Owner / Partner **Other Role:**
First Name: Kerry **Last Name:** Bourne **Suffix:**
RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: Owner / Partner Other Role:
First Name: Brian Last Name: McLaughlin Suffix:
RMD Association: Not associated with an RMD
Background Question: no

Individual Background Information 4

Role: Director Other Role:
First Name: Helena Last Name: Evans Suffix:
RMD Association: Not associated with an RMD
Background Question: no

ENTITY BACKGROUND CHECK INFORMATION

Entity Background Check Information 1

Role: Investor/Contributor Other Role:
Entity Legal Name: ReLeaf Alternative Inc. Entity DBA:
Entity Description: Massachusetts Corporation
Phone: 508-942-1960 Email: conorm@releafma.com
Primary Business Address 1: 321 School Street Primary Business Address 2:
Primary Business City: Mansfield Primary Business State: MA Principal Business Zip Code: 02048
Additional Information:

MASSACHUSETTS BUSINESS REGISTRATION

Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	ReLeaf Alternative Natick_Articles of Organization.pdf	pdf	61b3afafbcca2464fd7d0c7	12/10/2021
Bylaws	ReLeaf Alternative Natick_Bylaws.pdf	pdf	61e8cbb77c2bdd089a1f032e	01/19/2022
Secretary of Commonwealth - Certificate of Good Standing	ReLeaf Natick_SoC CoGS_1.18.22.pdf	pdf	61e8cbdb5099080851f32892	01/19/2022
Department of Revenue - Certificate of Good standing	ReLeaf Alternative Natick_DUA Attestation.pdf	pdf	621443db35cb3e08f7224a50	02/21/2022
Department of Revenue - Certificate of Good standing	ReLeaf Natick_DoR CoGS.pdf	pdf	6220d3da6670b20768e7bc21	03/03/2022

No documents uploaded

Massachusetts Business Identification Number: 001433039

Doing-Business-As Name:

DBA Registration City:

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload
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				Date
Plan for Liability Insurance	ReLeaf Natick_Plan for Obtaining Liability Insurance.pdf	pdf	61fc3c2c7c2bdd089a1f5490	02/03/2022
Business Plan	ReLeaf Alternative Natick_Business Plan.pdf	pdf	6220e86743c5a40747317433	03/03/2022
Proposed Timeline	ReLeaf Natick_Proposed Timeline.pdf	pdf	6220ed18e938dd07a5f4faff	03/03/2022

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	ReLeaf Natick_Plan for Obtaining Marijuana or Marijuana Products.pdf	pdf	61fc3c5d7c2bdd089a1f5494	02/03/2022
Restricting Access to age 21 and older	ReLeaf Natick_Plan for Restricting Access to Age 21 and Older.pdf	pdf	61fc3cc235cb3e08f721ed94	02/03/2022
Security plan	ReLeaf Natick_Security Plan.pdf	pdf	61fc3cccd3dbc608cffa6c3b	02/03/2022
Security plan	ReLeaf Natick_Prevention of Diversion.pdf	pdf	61fc3cd38dbcc3090663d359	02/03/2022
Storage of marijuana	ReLeaf Natick_Storage of Marijuana.pdf	pdf	61fc3cde8d09e508d6115c32	02/03/2022
Transportation of marijuana	ReLeaf Natick_Transportation of Marijuana.pdf	pdf	61fc3ce6f2351e085f728dc2	02/03/2022
Inventory procedures	ReLeaf Natick_Inventory Procedures.pdf	pdf	61fc3cefe95b8c0888816b2e	02/03/2022
Quality control and testing	ReLeaf Natick_Quality Control and Testing.pdf	pdf	61fc3cfbd04772090d5a3f4d	02/03/2022
Dispensing procedures	ReLeaf Natick_Dispensing Procedures.pdf	pdf	61fc3d04d3dbc608cffa6c45	02/03/2022
Personnel policies including background checks	ReLeaf Natick_Personnel Policies Including Background Checks.pdf	pdf	61fc3d10dc96b108e5519cba	02/03/2022
Record Keeping procedures	ReLeaf Natick_Recordkeeping Procedures.pdf	pdf	61fc3d1a71cb790879590758	02/03/2022
Maintaining of financial records	ReLeaf Natick_Maintaining of Financial Records.pdf	pdf	61fc3d2571cb79087959075e	02/03/2022
Qualifications and training	ReLeaf Natick_Qualifications and Training.pdf	pdf	61fc3d3bd3dbc608cffa6c4b	02/03/2022
Energy Compliance Plan	ReLeaf Natick_Energy Compliance Plan.pdf	pdf	61fc3d42e95b8c0888816b38	02/03/2022
Diversity plan	ReLeaf Natick_Diversity Plan.pdf	pdf	624dfa0753957f0008785950	04/06/2022

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 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:

COMPLIANCE WITH POSITIVE IMPACT PLAN

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 10:00 AM	Monday To: 10:00 PM
Tuesday From: 10:00 AM	Tuesday To: 10:00 PM
Wednesday From: 10:00 AM	Wednesday To: 10:00 PM
Thursday From: 10:00 AM	Thursday To: 10:00 PM
Friday From: 10:00 AM	Friday To: 10:00 PM
Saturday From: 10:00 AM	Saturday To: 10:00 PM
Sunday From: 12:00 PM	Sunday To: 10:00 PM

Host Community Agreement Certification Form

Instructions

Certification of a host community agreement is a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). Applicants must complete items 1-3. The contracting authority for the municipality must complete items 4-8. Failure to complete a section will result in the application not being deemed complete. This form should be completed and uploaded into your application. 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(2) and 501.400(2).

Certification

The parties listed below do certify that the applicant and municipality have executed a host community agreement on the specified date below pursuant to G.L. c. 94G § 3(d):

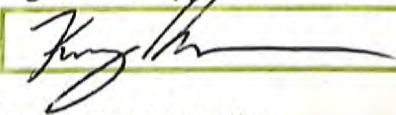
1. Name of applicant:

ReLeaf Alternative Natick, Inc.

2. Name of applicant's authorized representative:

Kerry Bourne

3. Signature of applicant's authorized representative:



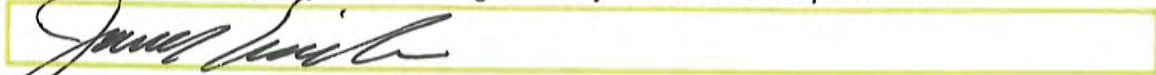
4. Name of municipality:

Natick

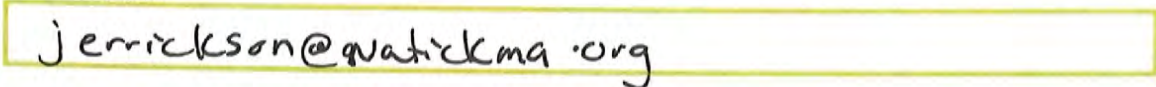
5. Name of municipality's contracting authority or authorized representative:

JAMES ERICKSON

6. Signature of municipality's contracting authority or authorized representative:



7. Email address of contracting authority or authorized representative of the municipality (*this email address may be used to send municipal notices pursuant to 935 CMR 500.102(1) and 501.102(1).*):



8. Host community agreement execution date:



PLAN TO REMAIN COMPLIANT WITH LOCAL ZONING

ReLeaf Alternative Natick, Inc. (“ReLeaf Natick”) will remain compliant at all times with the local zoning requirements set forth in the Natick’s Zoning By-Law. In accordance with Zoning By-Law Section III-K, ReLeaf Natick’s proposed Marijuana Retailer is located in the Retail Marijuana Overlay District designated for Marijuana Retailers.

In compliance with 935 CMR 500.110(3), the property is not located within 500 feet of a pre-existing public or private school providing education in kindergarten or any of grades 1 through 12. As per Natick’s Zoning By-Law, the property is not located within 500 feet of another Marijuana Retailer, nor is it located within a building containing residential units, including transient housing and group housing.

As required by Natick’s Zoning By-Law, ReLeaf Natick will apply for a Special Permit from the Planning Board. The Special Permit shall have a term limited to the duration of ReLeaf Natick’s control and/or use of the Premises as a Marijuana Establishment.

ReLeaf Natick will apply for any other local permits required to operate a Marijuana Retailer at the proposed location. ReLeaf Natick will comply with all conditions and standards set forth in any local permit required to operate a Marijuana Retailer at ReLeaf Natick’s proposed location.

ReLeaf Natick has already attended several meetings with various municipal officials and boards to discuss ReLeaf Natick’s plans for a proposed Marijuana Retailer and has executed a Host Community Agreement with Natick. ReLeaf Natick will continue to work cooperatively with various municipal departments, boards, and officials to ensure that ReLeaf Natick’s Marijuana Retailer remains compliant with all local laws, regulations, rules, and codes with respect to design, construction, operation, and security.



Community Outreach Meeting Attestation Form

Instructions

Community Outreach Meeting(s) are a requirement of the application to become a Marijuana Establishment (ME) and Medical Marijuana Treatment Center (MTC). 935 CMR 500.101(1), 500.101(2), 501.101(1), and 501.101(2). The applicant must complete each section of this form and attach all required documents as a single PDF document before uploading it into the application. If your application is for a license that will be located at more than one (1) location, and in different municipalities, applicants must complete two (2) attestation forms – one for each municipality. Failure to complete a section will result in the application not being deemed complete. 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(2) and 501.400(2).

Attestation

I, the below indicated authorized representative of that the applicant, attest that the applicant has complied with the Community Outreach Meeting requirements of 935 CMR 500.101 and/or 935 CMR 501.101 as outlined below:

1. The Community Outreach Meeting was held on the following date(s):
2. At least one (1) meeting was held within the municipality where the ME is proposed to be located.
3. At least one (1) meeting was held after normal business hours (this requirement can be satisfied along with requirement #2 if the meeting was held within the municipality and after normal business hours).

Attendees: 2

Recording: <https://us02web.zoom.us/rec/share/RD6C5hzXuDd9qP8AJKk-btK4P9h1-nTcSWrbhLvZCHAQ3lGunAO7sE4X3UnDDwb.95WQTTu-7ZZF0lbb> (Passcode: MS2.aKJ6)



4. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was published in a newspaper of general circulation in the municipality at least 14 calendar days prior to the meeting. A copy of this publication notice is labeled and attached as “Attachment A.”

- a. Date of publication:
- b. Name of publication:

5. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was filed with clerk of the municipality. A copy of this filed notice is labeled and attached as “Attachment B.”

- a. Date notice filed:

6. A copy of the community outreach notice containing the time, place, and subject matter of the meeting, including the proposed address of the ME or MTC was mailed at least seven (7) calendar days prior to the community outreach meeting to abutters of the proposed address, and residents within 300 feet of the property line of the applicant’s proposed location as they appear on the most recent applicable tax list, notwithstanding that the land of the abutter or resident is located in another municipality. A copy of this mailed notice is labeled and attached as “Attachment C.” Please redact the name of any abutter or resident in this notice.

- a. Date notice(s) mailed:

7. The applicant presented information at the Community Outreach Meeting, which at a minimum included the following:
- a. The type(s) of ME or MTC to be located at the proposed address;
 - b. Information adequate to demonstrate that the location will be maintained securely;
 - c. Steps to be taken by the ME or MTC to prevent diversion to minors;
 - d. A plan by the ME or MTC to positively impact the community; and
 - e. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law.
8. Community members were permitted to ask questions and receive answers from representatives of the ME or MTC.



Name of applicant:

ReLeaf Alternative Natick, Inc.

Name of applicant's authorized representative:

Conor McLaughlin

Signature of applicant's authorized representative:

Conor McLaughlin
2C4E68A0A7AB473...



RELEAF ALTERNATIVE NATICK, INC. – COMMUNITY OUTREACH MEETING

Attendees: 2

Link:

https://us02web.zoom.us/rec/share/zuaWR2H5Xcfy1ZF0Kh9ucpR11TD0_tlEQ8hL13LrITXo7xv7PxzSXS93CXb2ph-Y.PZR_wPzFWmX8OGP1?startTime=1645739281000

Passcode: MS2.aKJ6

classifieds

to advertise, visit our website: classifieds.wickedlocal.com
 classifieds phone: 800.624.7355
 classifieds/auto/real estate email: Classifieds@wickedlocal.com
 public notices/legal email: Legals@wickedlocal.com
 business & service email: WickedLocalBusServ@gannett.com
 jobs website: wickedlocal.com/jobs jobs email: recruits@local.com jobs phone: 833.516.0229

All classified ads are subject to the applicable rate card, copies of which are available from our Advertising Dept. All ads are subject to approval before publication. WickedLocal.com reserves the right to edit, refuse, reject, classify or cancel any ad at any time. Errors must be reported in the first day of publication. WickedLocal.com shall not be liable for any loss or expense that results from an error in or omission of an advertisement. No refunds for early cancellation of order.

Community

Announcements

FREE CORI Sealing Sign up: <https://bit.ly/corisingup> to get your MA criminal record (CORI) sealed or expunged through a free virtual clinic. Learn more: lawclearinghouse.org.

Adopt Me

Pets

Pet Care

Real Estate

Rentals

PUBLISHER'S NOTICE
 All real estate advertised herein is subject to the Federal Fair Housing Act, which makes it illegal to advertise any preference, limitation or discrimination because of race, color, religion, sex, handicap, familial status, or national origin, or intended to make any such preference, limitation, or discrimination. We will not knowingly accept any advertising for real estate which is in violation of the provisions of the law. All persons are hereby informed that all dwellings advertised are available on an equal opportunity basis.

Apartments

Your Source

Public Notices

Foreclosure/Sheriff Sales

LEGAL NOTICE

NOTICE OF MORTGAGEE'S SALE OF REAL ESTATE
 By virtue and in execution of the Power of Sale contained in a certain mortgage given by Mark A. Godlewski to Mortgage Electronic Registration Systems, Inc., as nominee for Cap West Mortgage Corporation, dated September 21, 2009 and recorded in the Worcester County (Worcester District) Registry of Deeds in Book 4686, Page 208, of which mortgage the undersigned is

Foreclosure/Sheriff Sales

description of the premises contained in said mortgage shall control in the event of an error in this publication.

Public Notices

LEGAL NOTICE

LEGAL NOTICE
 Four Positions Available for Annual Water District Election in Sudbury.
 District Clerk, Susan O'Connor, has announced there will be four official positions open for election of the 17th Annual Water District Election. Interested candidates must file their intention with the District Clerk through the Office Manager, Karen Morelli, on or before Friday, March 25, 2022, at 4:00 p.m. Candidates must be registered voters in the Town of Sudbury as well as members of the Sudbury Water District.

Foreclosure/Sheriff Sales

Other terms, if any, to be announced at the sale.

Public Notices

LEGAL NOTICE

LEGAL NOTICE
 Commonweal of Massachusetts
 DEPARTMENT OF THE TRIAL COURT
 22 SM 000233

Public Notices

including distribution of assets and expenses of administration. Interested parties are entitled to petition the Court to institute formal proceedings and to obtain orders terminating or restricting the powers of Personal Representatives appointed under informal procedures. A copy of the Petition and Will, if any, can be obtained from the Petitioner.

Public Notices

LEGAL NOTICE

LEGAL NOTICE
 Commonweal of Massachusetts
 DEPARTMENT OF THE TRIAL COURT
 22 SM 000233

TO ADVERTISE IN THIS SPOT
PLEASE CALL
800.624.7355 option 6

Business & Service Directory

to advertise, email: WickedLocalBusServ@gannett.com or call: 800.624.7355

Andy's Handyman
 Small Home Repairs
 Toilet & Faucet Repairs
 No job too small.
 (508) 244-9492

Get results. Advertise in CLASSIFIEDS!

Donofrio Plastering
 Fourth Generation Business
 plastering - all types • board installation • painting
 Fully Insured **508-660-8870**

R.C. MEANY & DAUGHTER
 PLUMBING • HEATING • GAS FITTING
508-509-6871
 WE FOLLOW ALL COVID-19 PROTOCOLS

YESKO Furniture Restoration
Fine Furniture Restoration
 Hiring!
 All work done by hand. 50 years of experience, many types of jobs. Custom finishing.
 Call Mark Yesko 508-655-4442
yeskofurniture.com

LEGAL NOTICE

LEGAL NOTICE
 Commonweal of Massachusetts
 DEPARTMENT OF THE TRIAL COURT
 22 SM 000233

ORDER OF NOTICE

TO: Corlton E. Zeigler and Carol A. Zeigler and to all persons entitled to the benefit of the Servicemembers Civil Relief Act, 50 U.S.C. § 3901 et seq.; Wilmington Savings Fund Society, F.S.B., not individually but solely as trustee for Finance of America Structured Securities Acquisition Trust 2018-HBI claiming to have an interest in a Mortgage covering real property in Holliston, numbered 2306 Washington Street, given by Corlton E. Zeigler and Carol A. Zeigler to Mortgage Electronic Registration Systems, Inc., as nominee for Urban Financial Group, Inc., dated November 26, 2012, and recorded or filed in Middlesex County (Southern District) Registry of Deeds in Book 6804, Page 15, and now held by Plaintiff by assignment. Plaintiff filed with this court a complaint for determination of Defendant's/Defendants' Servicemembers status.

If you now are, or recently have been, in the active military service of the United States of America, then you may be entitled to the benefits of the Servicemembers Civil Relief Act. If you object to or rescission of the above-mentioned property on that basis, then you or your attorney must file a written appearance and answer in this court at Three Pemberton Square, Boston, MA 02108 on or before 3/14/2022 or you may lose the opportunity to challenge the foreclosure on the ground of noncompliance with the Act.

Witness, GORDON H. PIPER, Chief Justice of this Court on 1/27/2022

Affest: Deborah J. Patterson Recorder

AD# 6882837 MDN: 2/11/2022

LEGAL NOTICE

NOTICE OF COMMUNITY OUTREACH MEETING RELIEF ALTERNATIVE NATICK, INC.
 Notice is hereby given that ReLeaf Alternative Natick, Inc. will hold a Virtual Community Outreach Meeting on February 24, 2022 at 5:00 PM to provide an update relative to its proposal to site a Adult Use Marijuana Retailer at 291 Worcester Street in Natick, Massachusetts.

The Virtual Community Outreach Meeting via Zoom is available at <https://us02.zoom.us/j/8212674149>. Participants may also dial in by telephone using the phone number: 301-715-8592 with meeting ID 821 2267 4149. A link to the website containing the meeting presentation may be obtained by emailing rebecca@vicentessederberg.com.

Interested members of the community will have the opportunity to ask questions and receive answers from company representatives about the proposed facility and operations. Questions can be submitted in advance by emailing rebecca@vicentessederberg.com

Incumbents, whose terms are expiring, as well as new candidates interested in running for office, may obtain the necessary forms and nomination papers by contacting Karen Morelli at 978-460-9230 to schedule a pick-up/drop-off day and time: 8:30 am-3:30 pm, Monday-Thursday and 8:30 am-1:00 pm, on Friday).

Wednesday, April 27, at 8:00 p.m. at the Town Office, 322 Concord Road, 01747 and forms are left in the rear entry vestibule. There is a locked drop box "in person". We recommend voters register online at <https://www.sec.state.ma.us>. A required ID from the Registry is needed, and the voter must be registered on or before 2/7th. A Mail-in Voter Registration form is available at the U.S. Post Office in Shaw's Plaza.

Voters need to be members of the Sudbury Water District as well as registered voters within the Town of Sudbury. Should a voter move within Town and the residence is still within the Water District, notification of such residence change should be given to the Town Clerk's office as well as to the Sudbury Water District.

AD# 6895165 MDN: 2/11/2022

GOMEZ ESTATE

LEGAL NOTICE

LEGAL NOTICE
 Commonweal of Massachusetts
 DEPARTMENT OF THE TRIAL COURT
 Middlesex County
 Family Court
 10-U Commerce Way
 Woburn, MA 01896
 (781)865-4000
 Docket No. M12ZP0318EA
 CITATION ON PETITION FOR FORMAL ADJUDICATION

Estate of: Santos Gomez

Date of Death: 04/01/2019

To all interested persons:

A Petition for Formal Adjudication of Intestacy and Appointment of Personal Representative has been filed by Nelida M Gomez of the Court enter a formal Decree and Order and for such other relief as may be requested in the Petition.

The Petitioner requests that: Nelida M. Gomez of Hudson MA be appointed as Personal Representative of said estate to serve Without Surety on the bond of the Personal Representative of said estate. You have the right to object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day of action may be taken without further notice to you.

UNSUPERVISED ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE

Public Notices

CODE (MUPC) A Personal Representative of an ununsupervised administration is not required to file an inventory or annual accounts with the Court. Persons interested in the estate are entitled to notice regarding the administration directly from the Personal Representative and may petition the Court in any matter relating to the estate, including the distribution of assets and expenses of administration.

Public Notices

LEGAL NOTICE

LEGAL NOTICE
 Commonweal of Massachusetts
 DEPARTMENT OF THE TRIAL COURT
 Middlesex County
 Family Court
 10-U Commerce Way
 Woburn, MA 01896
 (781)865-4000
 Docket No. M12ZP0318EA
 CITATION ON PETITION FOR FORMAL ADJUDICATION

Estate of: Shirley B. Grant

Date of Death: December 09, 2021

To all persons interested in the above captioned estate, by Petitioner of Plaintiff Debra Terrove of Upton MA and Frederick A. Grant, Jr. of North Fort Myers FL a Will has been admitted to probate. The estate is being administered under informal procedure by the Personal Representative of the estate to serve without surety on the bond. The estate is being administered under informal procedure by the Personal Representative of the estate to serve without surety on the bond. Interested parties are entitled to petition the Court to institute formal proceedings and to obtain orders terminating or restricting the powers of Personal Representatives appointed under informal procedures. A copy of the Petition and Will, if any, can be obtained from the Petitioner.

AD# 6891903 MDN: 2/11/2022

LEGAL NOTICE

COMMONWEALTH OF MASSACHUSETTS

NORFOLK SS. NORFOLK SUPERIOR COURT CIVIL ACTION NO. 218CV1121

BENJAMIN L. STRATMAN, Plaintiff,

vs. EXPRESS FUNDING, INC., QUALITY MORTGAGE USA, INC., OQM, INC., ARMESCO RESIDENTIAL MORTGAGE CORPORATION and the Heirs, Successors, and Assigns of EXPRESS FUNDING, INC., Defendants.

SUMMONS AND ORDER OF NOTICE FOR PUBLICATION

To: the following Defendants:

EXPRESS FUNDING, INC., QUALITY MORTGAGE USA, INC., OQM, INC., ARMESCO RESIDENTIAL MORTGAGE CORPORATION

Their legal representatives, heirs and assigns and such persons, if any unascertained, not in being, unknown, within or without the Commonwealth, or who cannot be served with process, their heirs or legal representatives or such other persons as shall become their heirs, devisees or appointees.

WHEREAS a Verified Civil Complaint to establish title pursuant to Massachusetts General Law, c. 240, §§ 6-10, to certain land in Bellingham, Massachusetts, has been commenced against you in Norfolk Superior Court, 650 High Street, Dedham, Massachusetts 02026, and it appears to the Court upon suggestion by the plaintiff, Benjamin L. Stratman, that you have not been served in this matter and the Court having allowed Plaintiff's Ex Parte Motion for Order of Service by Publication, it is,

ORDERED, that Notice of this Civil Action be given to you by (1) publishing a copy of this Order once a week for three consecutive weeks in the Milford Daily News, a newspaper published in the County of Worcester and circulated in the County of Norfolk, the last publication to be prior to March 11, 2022 and (2) serving you at any address (physical or virtual, including any email or social media address) of which they know or, after diligent inquiry, can learn.

You are hereby summoned and required to serve upon Plaintiff, Stratman, Esq., plaintiff's attorney whose address is the Law Firm of Doherty, Dugan, Connor, Raymond & Weil, P.C., 124 Grove Street, Ste. 220, Franklin, Massachusetts, 02038 an answer to the Complaint within 20 days after service of this Order upon you, exclusive of the day of service, if you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint. You are also required to file your answer to the Complaint in the County of Norfolk, the last publication to be prior to March 11, 2022 and (2) serving you at any address (physical or virtual, including any email or social media address) of which they know or, after diligent inquiry, can learn.

Witness, HEIDI E. BRIEGER, Esquire of Dedham, this 1st day of February 2022

SO ORDERED: Hon. Douglas H. Wilkins Associate Justice Superior Court

AD# 6880754 MDN: 2/11, 2/18, 2/25/2022

Public Notices

including distribution of assets and expenses of administration. Interested parties are entitled to petition the Court to institute formal proceedings and to obtain orders terminating or restricting the powers of Personal Representatives appointed under informal procedures. A copy of the Petition and Will, if any, can be obtained from the Petitioner.

Public Notices

LEGAL NOTICE

LEGAL NOTICE
 Commonweal of Massachusetts
 DEPARTMENT OF THE TRIAL COURT
 Middlesex County
 Family Court
 10-U Commerce Way
 Woburn, MA 01896
 (781)865-4000
 Docket No. M12ZP0318EA
 CITATION ON PETITION FOR FORMAL ADJUDICATION

Estate of: Helen Terrove

Date of Death: October 27, 2021

To all persons interested in the above-captioned estate, by Petitioner of Plaintiff Debra Terrove of Upton MA and Frederick A. Grant, Jr. of North Fort Myers FL a Will has been admitted to probate. The estate is being administered under informal procedure by the Personal Representative of the estate to serve without surety on the bond. The estate is being administered under informal procedure by the Personal Representative of the estate to serve without surety on the bond. Interested parties are entitled to petition the Court to institute formal proceedings and to obtain orders terminating or restricting the powers of Personal Representatives appointed under informal procedures. A copy of the Petition and Will, if any, can be obtained from the Petitioner.

AD# 6891903 MDN: 2/11/2022

LEGAL NOTICE

COMMONWEALTH OF MASSACHUSETTS

NORFOLK SS. NORFOLK SUPERIOR COURT CIVIL ACTION NO. 218CV1121

BENJAMIN L. STRATMAN, Plaintiff,

vs. EXPRESS FUNDING, INC., QUALITY MORTGAGE USA, INC., OQM, INC., ARMESCO RESIDENTIAL MORTGAGE CORPORATION and the Heirs, Successors, and Assigns of EXPRESS FUNDING, INC., Defendants.

SUMMONS AND ORDER OF NOTICE FOR PUBLICATION

To: the following Defendants:

EXPRESS FUNDING, INC., QUALITY MORTGAGE USA, INC., OQM, INC., ARMESCO RESIDENTIAL MORTGAGE CORPORATION

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WHEREAS a Verified Civil Complaint to establish title pursuant to Massachusetts General Law, c. 240, §§ 6-10, to certain land in Bellingham, Massachusetts, has been commenced against you in Norfolk Superior Court, 650 High Street, Dedham, Massachusetts 02026, and it appears to the Court upon suggestion by the plaintiff, Benjamin L. Stratman, that you have not been served in this matter and the Court having allowed Plaintiff's Ex Parte Motion for Order of Service by Publication, it is,

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Witness, HEIDI E. BRIEGER, Esquire of Dedham, this 1st day of February 2022

SO ORDERED: Hon. Douglas H. Wilkins Associate Justice Superior Court

AD# 6880754 MDN: 2/11, 2/18, 2/25/2022

↩ Reply all ▾ 🗑 Delete 🚫 Junk 🚫 Block ⋮

Notice of Community Outreach Meeting



Bridgette Nikisher

Fri 2/4/2022 9:29 AM

To: townclerk@natickma.org

Cc: Rebecca Rutenberg



reLeaf Alternative Natick ...
16 KB

Good morning,

Please find attached a notice of a community outreach meeting to be held on February 24, 2022 at 5pm. Please let me know if you have any questions or would like additional information.

Thank you!

Best,

Bridgette Nikisher

Strategic Affairs Specialist

She/Her/Hers

Vicente Sederberg LLP

1115 Broadway, 12th Floor

New York, NY 10010

Direct: 917-398-0685

Main: 917-338-5455

b.nikisher@vicentesederberg.com

VicenteSederberg.com

[Confidentiality Notice](#)

VicenteSederberg.com

[Confidentiality Notice](#)

Reply | Reply all | Forward

**NOTICE OF COMMUNITY OUTREACH MEETING
RELEAF ALTERNATIVE NATICK, INC.**

Notice is hereby given that ReLeaf Alternative Natick, Inc. will hold a Virtual Community Outreach Meeting on **February 24, 2022** at 5:00 PM to provide an update relative to its proposal to site an Adult Use Marijuana Retailer at 291 Worcester Street in Natick, Massachusetts.

The Virtual Community Outreach Meeting via Zoom is available at <https://us02web.zoom.us/j/82122674149>. Participants may also dial in by telephone using the phone number: 301-715-8592 with meeting ID 821 2267 4149#. A link to a website containing the meeting presentation may be obtained by emailing rebecca@vicentesederberg.com.

Interested members of the community will have the opportunity to ask questions and receive answers from company representatives about the proposed facility and operations. Questions can be submitted in advance by emailing rebecca@vicentesederberg.com or asked during the meeting.

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PLAN TO POSITIVELY IMPACT AREAS OF DISPROPORTIONATE IMPACT

Goals

In order for ReLeaf Alternative Natick, Inc. (“ReLeaf Natick”) to positively impact past or present residents of Walpole and Massachusetts residents who have past drug convictions, ReLeaf Natick has established the following goals:

- Strive for at least 10% of staff to be comprised of Walpole residents; and
- Host or participate in two (2) annual seminars relative to record sealing and expungement for Massachusetts residents.

Programs

ReLeaf Natick has developed specific programs to effectuate its stated goals to positively impact past or present residents of Walpole and Massachusetts residents who have past drug convictions. Such programs will include the following:

- ReLeaf will post job advertisements (as positions become available, but not less than annually) in the Times Advocate – a local Walpole newspaper;
- ReLeaf will host or participate in two (2) annual seminars on record sealing and expungement:
 - Seminars will be advertised via social media (Facebook and Instagram, and in accordance with the requirements of 935 CMR 500.105(4)) and directed towards Massachusetts residents with prior drug convictions;
 - Each seminar will be able to accommodate no fewer than ten (10) participants;
 - Seminars may be held online.

Measurements

The Chief Operating Officer will administer the Plan and will be responsible for developing measurable outcomes to ensure ReLeaf Natick continues to meet its commitments. Such measurable outcomes, in accordance with ReLeaf Natick’s goals and programs described above, include:

- Completing an annual employee survey to identify the demographics of ReLeaf Natick’s employees, including Walpole residents;
- Documenting any advertisements placed with the Times Advocate;
- Documenting any seminars concerning record sealing and expungement, including related advertisements; time, place, and manner; and participants.

Beginning upon receipt of ReLeaf Natick’s first Provisional License from the Commission to operate a marijuana establishment in the Commonwealth, ReLeaf Natick will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The Chief Operating Officer will review and evaluate ReLeaf Natick’s measurable outcomes no less than twice annually to ensure that ReLeaf Natick is meeting its commitments. ReLeaf Natick is mindful that demonstration of the Plan’s progress and success will be submitted to the Commission upon renewal.

Acknowledgements

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



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

Articles of Organization

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

Identification Number: 001433039

ARTICLE I

The exact name of the corporation is:

RELEAF ALTERNATIVE NATICK, 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	1,000	\$0.00	100

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.

ARTICLE V

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

ARTICLE VI

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

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

ARTICLE VII

The effective date of organization 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: FRANK SCIACCA
No. and Street: 323 MANLEY STREET
City or Town: WEST BRIDGEWATER State: MA Zip: 02379 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	KERRY BOURNE	22 BRENTWOOD DRIVE NORTH EASTON, MA 02356 USA
TREASURER	KERRY BOURNE	22 BRENTWOOD DRIVE NORTH EASTON, MA 02356 USA
SECRETARY	CONOR MCLAUGHLIN	37 CHARLOTTE AVENUE NORTON, MA 02766 USA
CEO	KERRY BOURNE	22 BRENTWOOD DRIVE NORTH EASTON, MA 02356 USA
COO	CONOR MCLAUGHLIN	37 CHARLOTTE AVENUE NORTON, MA 02766 USA
DIRECTOR	HELENA EVANS	238 WALNUT STREET BROOKLINE, MA 02445 USA
DIRECTOR	CONOR MCLAUGHLIN	37 CHARLOTTE AVENUE NORTON, MA 02766 USA
DIRECTOR	KERRY BOURNE	22 BRENTWOOD DRIVE NORTH EASTON, MA 02356 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:

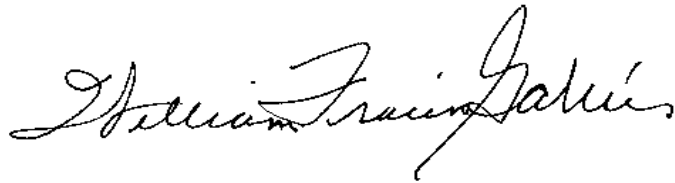
APPLY FOR LICENSE WITH THE CANNABIS CONTROL COMM.

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

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:

April 08, 2020 04:36 PM

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

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

**BYLAWS
OF
RELEAF ALTERNATIVE NATICK, INC.

(A MASSACHUSETTS CORPORATION)**

ARTICLE I
DEFINITIONS

The following terms used in these Bylaws of the Company shall have the following meanings:

“**Act**” shall mean the Massachusetts Business Corporation Act, as amended, Massachusetts General Laws Chapter 156D.

“**Articles of Organization**” shall mean the Articles of Organization of the Company as filed with the Secretary of the Commonwealth of Massachusetts, as amended from time to time.

“**Bylaws**” shall mean these Bylaws, as amended from time to time.

“**Code**” shall mean the Internal Revenue Code of 1986, as amended, or corresponding provisions of subsequent superseding federal revenue laws.

“**Company**” shall mean reLeaf Alternative Natick, Inc., a Massachusetts corporation.

“**Directors** and **Board of Directors**” shall mean one or more Directors. References to the Directors in the plural shall also, where the context so requires, be deemed to include the singular. “**Board**” shall mean the Company’s Board of Directors comprised of the number of Directors specified in Section 6.1 of these Bylaws.

“**Fiscal Year**” shall mean the calendar year ending on December 31st.

“**Major Actions**” shall mean the actions described in Section 6.2 of these Bylaws.

“**Officer** or **Officers**” shall mean the President or any other Officer of the Company.

“**Proceeding**” shall have the meaning set forth in Section 12.1 of these Bylaws.

“**Shares**” shall mean all currently held and outstanding shares of the Company.

“**Shareholders**” shall mean the Shareholders listed on Schedule B hereto.

ARTICLE II

ARTICLE OF ORGANIZATION; OFFICES

2.1 Articles of Organization. The name of the corporation shall be reLeaf Alternative Natick, Inc. These Bylaws (the “**Bylaws**”), the powers of the Company and of its Directors and Shareholders, and all matter concerning the conduct and regulation of the business of the Company shall be subject to the Articles of Organization. All references in these Bylaws to the Articles of Organization shall mean the Articles of Organization of the Company, as from time to time in effect. All references in these Bylaws

to the Massachusetts Business Corporation Act shall mean Massachusetts General Laws Chapter 156D, as amended from time to time (the “**Act**”).

2.2 Registered Office. The registered office of the corporation in the Commonwealth of Massachusetts shall be 323 Manley Street, West Bridgewater, MA 02379 or in such other location as the Board of Directors of the Company may from time to time determine, or the business of the Company may require.

2.3 Other Offices. The Company shall also have and maintain an office or principal place of business at such place as may be affixed by the Board of Directors.

ARTICLE IV

BUSINESS OF THE COMPANY

4.1 Business. The business of the Company shall be:

(a) To accomplish any lawful business whatsoever as determined by the Shareholders and Board of Directors.

ARTICLE V

SHAREHOLDERS

5.1 Annual Meeting. The annual meeting of the Shareholders shall be held on such date and time as may be designated from time to time by the Board of Directors. Except as otherwise may be provided in the Articles of Organization, purposes for which an annual meeting is to be held, in addition to the election of directors, may be specified by the Board of Directors or by the President and stated in the notice of the meeting.

5.2 Special Meetings.

(a) Special meetings of the Shareholders of the Company may be called, for any purpose or purposes, by (i) President; or (ii) the Board of Directors pursuant to a resolution adopted by Directors representing a quorum of the Directors serving on the Board of Directors or (iii) by the Shareholders, and shall be held in such place, on such date, and at such time as the Board of Directors shall affix.

(b) If a special meeting is properly called by any person or persons other than the Board of Directors, the request shall be in writing, specifying the general nature of the business proposed to be transacted, and shall be delivered personally or sent by certified or registered mail, return receipt requested, or by telegraphic or other facsimile transmission to the Chairman of the Board of Directors or the President. No business may be transacted at such special meeting otherwise than specified in such notice. The Board of Directors shall determine the time and place of such special meeting, which shall be held not less than two (2) nor more than four (4) days after the date of the receipt of the request. Upon determination of the time and place of the meeting, the officer receiving the request shall cause notice to be given to the Shareholders entitled to vote, in accordance with the provisions of Section 5.3 of these Bylaws. Nothing contained in this

paragraph (b) shall be construed as limiting, fixing, or affecting the time when a meeting of Shareholders called by action of the Board of Directors may be held.

5.3 Notice of Meeting. Except as otherwise provided by law, notice, given in writing or by electronic transmission, of each meeting of Shareholders shall be given not less than two (2) nor more than four (4) days before the date of the meeting to each shareholder entitled to vote at such meeting, such notice to specify the place, if any, date and hour, in the case of special meetings, the purpose or purposes of the meeting, and the means of remote communications, by which Shareholders and proxyholders may be deemed to be present in person and vote at any such meeting. If mailed, notice is given when deposited with an overnight courier service (FedEx, UPS, etc.), directed to the shareholder at such shareholder's address as it appears on the records of the corporation. Notice of the time, place, if any, and purpose of any meeting of Shareholders may be waived in writing, signed by the person entitled to notice thereof or by electronic transmission by such person, either before or after such meeting, and will be waived by any shareholder by his or her attendance thereat in person, by remote communication, if applicable, or by proxy, except when the shareholder attends a meeting for the express purpose of objecting, at the beginning of the meeting, to the transaction of any business because the meeting is not lawfully called or convened. Any shareholder so waiving notice of such meeting shall be bound by the proceedings of any such meeting in all respects as if due notice thereof had been given.

5.4 Quorum. At all meetings of shareholder, except where otherwise provided by the Act or by the Articles of Organization, or by these Bylaws, the presence, in person, by remote communication, or by proxy duly authorized, of the holders of a majority in interest of the outstanding Shares of stock entitled to vote shall constitute a quorum for the transaction of business. In the absence of a quorum, any meeting of Shareholders may be adjourned, from time to time, either by the chairman of the meeting or by vote of the holders of a majority of the Shares represented thereat, but no other business shall be transacted at such meeting. The Shareholders present at a duly called or convened meeting, at which a quorum is present, may continue to transact business until adjournment, notwithstanding the withdrawal of enough Shareholders to leave less than a quorum. Except as otherwise provided by the Act, or by the Articles of Organization or these Bylaws, in all matters, including the election of directors for the Board of Directors, the affirmative vote of a majority in interest of the outstanding Shares present in person, by remote communication, or represented by proxy duly authorized at the meeting and entitled to vote generally on the subject matter shall be the act of the Shareholders.

5.5 Remote Participation. Shareholders and proxyholders not physically present at a meeting of Shareholders may participate in a meeting of Shareholders, be deemed present in person, and vote at a meeting of Shareholders, by means of remote communication, subject to such guidelines and procedures as the Board of Directors may adopt. Such guidelines and procedures shall include reasonable measures (i) to verify that each person deemed present and permitted to vote at the meeting by means of

remote communication is a shareholder or proxyholder, and (ii) to provide such Shareholders and proxyholders a reasonable opportunity to participate in the meeting and to vote on matters submitted to the Shareholders, including an opportunity to read or hear the proceedings of the meeting substantially concurrently with such proceedings. If any shareholder or proxyholder votes or takes other action at the meeting by means of remote communication, the Company shall maintain a record of such vote or other action.

5.6 List of Shareholders. The Secretary shall prepare and make, at least one (1) day before every meeting of Shareholders, a complete list of the Shareholders entitled to vote at said meeting, arranged in alphabetical order, showing the address of each shareholder and the number of Shares registered in the name of each shareholder. Such list shall be open to the examination of any shareholder, for any purpose germane to the meeting. The list shall be open to examination of any Shareholders during the time of the meeting as provided by law.

5.7 Action Without Meeting; Action by Consent.

(a) Unless otherwise provided in the Articles of Organization, any action required by statute to be taken at any annual or special meeting of the Shareholders, or any action which may be taken at any annual or special meeting of the Shareholders, may be taken without a meeting, without prior notice and without a vote, if a consent in writing, or by electronic transmission setting forth the action so taken, shall be signed by the holders of outstanding stock having not less than the minimum number of votes that would be necessary to authorize or take such action at a meeting at which all Shares entitled to vote thereon were present and voted.

(b) Every written consent or electronic transmission shall bear the date of signature of each shareholder who signs the consent, and no written consent or electronic transmission shall be effective to take the corporate action referred to therein unless, within thirty (30) days of the earliest dated consent delivered to the corporation in the manner herein required, written consents or electronic transmissions signed by a sufficient number of Shareholders to take action are delivered to the corporation by delivery to its principal place of business or an officer or agent of the corporation having custody of the book in which proceedings of meetings of Shareholders are recorded. Delivery made to a corporation's registered office shall be by hand or by overnight courier service (FedEx, UPS, etc.).

(c) Prompt notice of the taking of the corporate action without a meeting by less than unanimous written consent shall be given to those Shareholders who have not consented in writing or by electronic transmission and who, if the action had been taken at a meeting, would have been entitled to notice of the meeting if the record date for such meeting had been the date that written consents signed by a sufficient number of Shareholders to take action were delivered to the corporation as provided in Section 7.04 of the Act. If the action to which the Shareholders consented is such as would have required the filing of a certificate under any section of the Act if such action had been voted on by Shareholders at a meeting thereof, then the certificate filed under such section shall state, in lieu of any statement required by such section concerning any vote

of Shareholders, that written consent has been given in accordance with Section 7.04 of the Act.

(d) An electronic mail, facsimile or other electronic transmission consenting to an action to be taken and transmitted by a shareholder or proxyholder, shall be deemed to be written, signed and dated for the purposes of this Section, provided that any such electronic mail, facsimile or other electronic transmission sets forth or is delivered with information from which the corporation can determine (i) that the electronic mail, facsimile or other electronic transmission was transmitted by the shareholder or proxyholder or by a person or persons authorized to act for the shareholder and (ii) the date on which such shareholder or proxyholder or authorized person or persons transmitted such electronic mail, facsimile or electronic transmission. The date on which such electronic mail, facsimile or electronic transmission is transmitted shall be deemed to be the date on which such consent was signed. Any copy, facsimile or other reliable reproduction of a consent in writing may be substituted or used in lieu of the original writing for any and all purposes for which the original writing could be used, provided that such copy, facsimile or other reproduction shall be a complete reproduction of the entire original writing.

ARTICLE VI

DIRECTORS

6.1 Number and Term of Office. The Company's affairs shall be overseen by a Board of Directors. The Company shall initially have three (3) Directors whose name are set forth in Schedule C hereto. The number of authorized Directors shall be no greater than six (6) as may be determined by the Directors from time to time. The Board of Directors shall be comprised of individuals elected by the Shareholders. Each Director shall hold office until such time that said Director resigns or is removed pursuant to Section 6.3 of these Bylaws.

6.2 Powers of the Board of Directors. The business and affairs of the Company shall be managed under the direction and supervision of the Board of Directors, except as may be provided otherwise by the Act, the Articles of Organization, or these Bylaws.

6.3 Resignation, Removal, Vacancy. A Director may resign at any time by delivering written notice of resignation to the Board of Directors or the Company. Except as otherwise provided by the Act, the Articles of Organization, or these bylaws: (i) the Shareholders may remove one or more Directors with or without cause, and (ii) the Shareholders shall fill any vacancy on the Board of Directors by a vote of the Shareholders. For the purposes of this Section 6.3, "Cause" shall be defined as fraud, gross negligence, misapplication or misappropriation of funds, or a material breach of these Bylaws.

6.4 Regular Meetings. Regular meetings of the Board of Directors may be held without call or formal notice at such places and at such times as the Board of

Directors may decide from time to time. A regular meeting of the Board of Directors may be held without call or formal notice immediately after and at the same place as the annual meeting of the Shareholders, or the special meeting of the Shareholders held in place of such annual meeting.

6.5 Special Meetings. Special meeting of the Board of Directors may be held at any time and at any place when called by the President. Notice of such meeting shall be given to each director by the President or Secretary. Such notice (i) must be given at least two (2) days prior to the date of the special meeting, and (ii) need not described the purpose of the meeting unless otherwise required by the Articles of Organization or these Bylaws.

6.6 Waiver of Notice. A Director may waive notice of any Directors' meeting before or after the date of the meeting. The waiver shall be in writing and may be transmitted electronically from the Directors associated email account. The waiver shall be filed with the minutes or corporate records.

6.7 Quorum and Voting. A majority in interest shall constitute a quorum for the transaction of business, but a lesser number may adjourn any meeting from time to time, and the meeting may be held as adjourned without further notice, If a quorum is present when a vote is taken, the affirmative vote of a majority is the act of the Board of Directors.

6.8 Action Without Meeting. Unless otherwise restricted by the Articles of Organization or these Bylaws, any action required or permitted to be taken at any meeting of the Board of Directors or of any committee thereof may be taken without a meeting, if all members of the Board of Directors or committee, as the case may be, consent thereto in writing or by electronic transmission, and such writing or writings or transmission or transmissions are filed with the minutes of proceedings of the Board of Directors or committee. Such filing shall be in paper form if the minutes are maintained in paper form and shall be in electronic form if the minutes are maintained in electronic form.

6.9 Remote Participation. Members of the Board of Directors may participate in a meeting of the Board of Directors or conduct any such meeting, through the use of any means of communication by which all Directors participating may simultaneously hear each other during the meeting and participation by such means shall constitute presence in person at the meeting.

ARTICLE VII

EXECUTIVE AND OTHER OFFICERS

7.1 Officers Designated. The officers of the Company shall consist of a President, Treasurer and Secretary, who shall be elected by the Board of Directors, and such other officers as the Board of Directors may appoint. The names of the initial Officers serving the Company and the capacities in which they serve are set forth on Schedule A.

7.2 Tenure and Duties of Officers.

(a) All officers shall hold office at the pleasure of the Board of Directors and until their successors shall have been duly elected or appointed and qualified, unless sooner removed. Any officer elected or appointed by the Board of Directors may be removed at any time by the Board of Directors. If the office of any officer becomes vacant for any reason, the vacancy may be filled by the Board of Directors, or by the President if so authorized by the Board of Directors.

(b) President. The President shall also be the chief executive officer of the Company and shall, subject to the direction of the Board of Directors, have general supervision and control of the Company's business and operations. Unless otherwise provided by the Board of Directors, the President shall preside at all meetings of the Shareholders and of the Board of Directors.

(c) Treasurer. The Treasurer shall have general charge of the financial concerns of the Company. The Treasurer shall keep, or cause to be kept, accurate books and records of the financial state of the Company. The Treasurer shall directly report to the President/CEO.

(d) Secretary. The Secretary shall keep a record of all meetings of the Shareholders, Board of Directors, or executive meetings. The Secretary shall directly report to the President/CEO. The Secretary shall preside at all meetings of the Shareholders, Board of Directors and executives.

(e) Chief Operating Officer "COO". The COO shall have general day-to-day supervision and control over the operational procedures of the Company's business. The COO shall directly report to the President/CEO. Unless otherwise provided by the Board of Directors, the COO shall preside at all meetings of the Shareholders and of the Board of Directors.

(f) Chief Compliance Officer "CCO". The CCO shall be accountable for, and oversee, the compliance within the Company, and ensure compliance with laws, regulatory requirements, policies and procedures. The CCO shall directly report to the President/CEO. Unless otherwise provided by the Board of Directors, the CCO shall preside at all meetings of the Shareholders and of the Board of Directors.

7.3 Resignations. Any officer may resign at any time by giving notice in writing or by electronic transmission notice to the Board of Directors. Any such resignation shall be effective when received by the person or persons to whom such notice is given, unless a later time is specified therein, in which event the resignation shall become effective at such later time. Unless otherwise specified in such notice, the acceptance of any such resignation shall not be necessary to make it effective. Any resignation shall be without prejudice to the rights, if any, of the corporation under any contract with the resigning officer.

7.4 Removal. Any officer may be removed from office at any time, for cause, by the unanimous affirmative vote of the Board of Directors, or by the unanimous written or electronic consent of the Board of Directors in office at the time. "Cause" shall be defined as fraud, gross negligence, misapplication or misappropriation of funds, or a material breach of these Bylaws.

ARTICLE VIII

SHARES OF STOCK

8.1 Form and Execution of Certificates. The Shares of the Company shall be represented by certificates, or shall be uncertificated. Certificates for the Shares of stock, if any, of the Company shall be in such form as is consistent with the Articles of Organization and applicable law. Any stock certificate issued by the corporation will note conspicuously that the Company is a corporation pursuant to the Act. Every holder of Shares of stock in the Company represented by certificate shall be entitled to have a certificate signed by or in the name of the corporation by any two authorized officers of the corporation, including but not limited to the President and Treasurer, certifying the number of shares owned by him or her in the Company. Any or all of the signatures on the certificate may be facsimiles. In case any officer, transfer agent, or registrar who has signed or whose facsimile signature has been placed upon a certificate shall have ceased to be such officer, transfer agent, or registrar before such certificate is issued, it may be issued with the same effect as if he or she were such officer, transfer agent, or registrar at the date of issue.

8.2 Lost Certificates. A new certificate or certificates shall be issued in place of any certificate or certificates theretofore issued by the Company alleged to have been lost, stolen, or destroyed, upon the making of an affidavit of that fact by the person claiming the certificate of stock to be lost, stolen, or destroyed. The Company may require, as a condition precedent to the issuance of a new certificate or certificates, the owner of such lost, stolen, or destroyed certificate or certificates, or the owner's legal representative, to agree to indemnify the Company in such manner as it shall require against any claim that may be made against the corporation with respect to the certificate alleged to have been lost, stolen, or destroyed.

8.3 Restriction on Transfers No Shareholder may sell, transfer, assign, pledge, or otherwise dispose of or encumber any of the Shares of stock of the Company or any right or interest therein, whether voluntarily or by operation of law, or by gift or otherwise (each, a "**Transfer**"), unless such Transfer is due to the automatic divestiture provisions of Article XI of these Bylaws, without the affirmative unanimous vote of the Shareholders. The Company may withhold consent for any legitimate corporate purpose, as determined by an affirmative unanimous vote of the Shareholders.

8.4 Right of First Refusal.

(a) Notwithstanding the foregoing contained in Section 8.3 of these Bylaws, commencing on the date that is five (5) years from the date of incorporation of the Company as listed on the Articles of Organization, if any Shareholder ("**Transferring Shareholder**") desires to sell or transfer any of its Shares of stock of the Company ("**Proposed Transfer**"), the Transferring Shareholder shall first give written notice thereof to the Company ("**Proposed Transfer Notice**"). The notice shall name the proposed transferee and state the number of Shares of stock of the Company to be transferred, the proposed consideration, and all other terms and conditions of the Proposed Transfer. Any Proposed Transfer will first be subject to the Company's right of first refusal contained in this Section 8.4.

(b) For thirty (30) days following receipt of such notice, the Company shall have the option to purchase ("**Option Notice**") the Shares of stock of the Company upon the terms set forth in such Proposed Transfer Notice ("**Option Period**"). The Company shall have the right to assign its rights under this Section 8.4. Such assignee(s) shall have the same rights afforded to the Company under this Section 8.4.

(c) In the event the Company and/or its assignee(s) elect to acquire the Shares of stock of the Company as specified in the Proposed Transfer Notice, the Company shall give such Option Notice in writing to the Transferring Shareholder. Such purchase shall occur within sixty (60) days of the delivery of the Option Notice upon the same terms and conditions contained in the Proposed Transfer Notice.

(d) In the event the Company and/or its assignee(s) do not elect to acquire the Share of stock of the Company as specified in the Proposed Transfer Notice, said Transferring Shareholder may, subject to the Company's approval and all other restrictions on Transfer prescribed under these Bylaws, within the sixty (60) day period following expiration of the Option Period or waiver of the Company, transfer the Shares of stock of the Company as specified in the Proposed Transfer Notice. All Shares of stock of the company sold by the Transferring Shareholder shall continue to be subject to the provisions of these Bylaws (specifically, Section 8.3), the Articles of Organization and the Act.

ARTICLE IX

DIVIDENDS

9.1 Declaration of Dividends. Dividends upon the stock of the Company, subject to the provisions of the Articles of Organization and applicable law, if any, may be declared by the Board of Directors upon an affirmative vote of a majority, and pursuant to law at any regular or special meeting. Dividends may be paid in cash, in property, or in shares of the capital stock, subject to the provisions of the Articles of Organization, the Act, and applicable law.

9.2 Dividend Reserve. Before payment of any dividend, there may be set aside out of any funds of the Company available for dividends such sum or sums as the Board of Directors from time to time, in their absolute discretion, think proper as a reserve or reserves to meet contingencies, or for equalizing dividends, or for repairing or maintaining any property of the Company, or for such other purpose as the Board of Directors shall think conducive to the interests of the Company, and the Board of Directors may modify or abolish any such reserve in the manner in which it was created.

ARTICLE X

INDEMNIFICATION

10.1 Indemnification of Directors, Executive Officers, Employees and Other Agents. The Company shall indemnify and hold harmless each present or former Director or Officer of the Company to the fullest extent permitted by law, subject to such determination as the law may require that indemnification is permissible, for any threatened, pending or completed action, suit, or proceeding, whether civil, criminal, administrative, arbitrative, or investigative, and whether formal or informal (“**Proceeding**”), against such Director or Officer in his or her capacity as such. The Company may, before final disposition of any Proceeding, advance funds to pay for or reimburse the reasonable expenses incurred by a Director or Officer who is a party to a Proceeding to the extent permitted by law. Nothing in this Section shall affect any rights to indemnification to which any person may be entitled by contract or otherwise under law. No amendment or repeal of any provisions of this Section shall adversely affect the right of a person to indemnification under this Section with respect to his or her acts or omissions that occurred at any time prior to such amendment or appeal.

ARTICLE XI

AUTOMATIC DIVESTITURE

11.1 Automatic Divestiture. If, during any time while the Company holds a local or state cannabis business license, any of the following occur to a Shareholder or to a member of an entity that is a Shareholder of the Company, all interests of such Shareholder (the “**Affected Shareholder**”) will automatically and immediately terminate, and the Affected Shareholder will cease to be a Shareholder of the Company:

(a) The Affected Shareholder is charged with or convicted of any criminal offense, if a conviction of the offense in question would, pursuant to the applicable laws and regulations, disqualify the Affected Shareholder from having an ownership interest in a cannabis business; *provided, however*, where an Affected Shareholder is only charged with a criminal offense and not convicted, and where the applicable cannabis regulatory body and any other local or state licensing authority upon request have agreed to defer pursuing any action against the Company’s cannabis business license(s) based on such charges, or where any such actions of the applicable cannabis regulatory body and local licensing authorities are subject to a stay order, then the Affected Shareholder’s shares shall not be subject to divestiture under this Section 11.1.

(b) The Affected Shareholder, or any entity that the Affected Shareholder owns or controls, incurs a revocation of any cannabis business license, and it is determined by the Board that such revocation has a material adverse effect upon the issuance or continued good standing of the cannabis business license(s) of the Company or any subsidiary of the Company.

(c) The applicable cannabis regulatory body or local licensing authority issues a formal recommendation stating that the Affected Shareholder is unfit to have an ownership or economic interest in a cannabis business.

(d) The applicable cannabis regulatory body or local licensing authority issues a formal recommendation against the issuance to the Company, or any subsidiary of the Company, of a cannabis business license or revokes a cannabis business license, which recommendation or revocation cites the participation of the Affected Shareholder as a material factor in the decision, or the applicable cannabis regulatory body or local licensing authority conditions the issuance of a cannabis business license on the Company removing the Affected Shareholder from the Company.

(e) The applicable cannabis regulatory body or local licensing authority advises the Company, in writing, or it is otherwise determined by court order, that a decision on the Company's cannabis business license is being delayed by at least one (1) year following the filing of the Company's application for a cannabis business license, and the Company is advised before or after said date that the sole reason for such delay is the participation of or concerns about the Affected Shareholder.

(f) The Affected Shareholder demonstrates a repeated failure to attend meetings with the applicable cannabis regulatory body or any local licensing authority as required for the Company to conduct its business. As used herein, "repeated failure to attend" shall be demonstrated by failure to attend any meeting without good cause, or any two (2) meetings with any licensing authority.

(g) The Affected Shareholder fails to provide information to the applicable cannabis regulatory body which is requested by or required by the applicable cannabis regulatory body.

(h) If the Affected Shareholder is a partnership or other business entity and not a natural person, a member of the Affected Shareholder is disqualified from obtaining an ownership interest in a licensed cannabis business by final written determination of the applicable cannabis regulatory body, unless such member is divested from the Affected Shareholder in a timely manner.

11.2 Redemption of Shares Following Automatic Divestiture.

(a) The Company shall continue in existence notwithstanding the automatic termination and divestiture of any Affected Shareholder pursuant to Section 11.1 above.

Notwithstanding any provision of these Bylaws to the contrary, if the Affected Shareholder is a corporate entity and the occurrence of any of the events enumerated in Section 11.1 above is due to a member, shareholder, manager, director, or officer of the Affected Shareholder, the Affected Shareholder shall have an option to reclaim its shares and shall be restored to its ownership position before the divestiture events occurred if the Board, a court of law, or the applicable cannabis regulatory body provides a written assurance or order that Affected Shareholder has removed the member, shareholder, manager, director, or officer that caused any of the events enumerated in Section 11.1 above, pursuant to the terms of the Affected Shareholder's governing documents.

(b) The Company shall be liable for the terminated ownership interest of the Affected Shareholder as follows:

- (i) The Company and the Affected Shareholder shall determine the fair market value of the Affected Shareholder's shares by a mutually agreed upon third-party appraisal.
- (ii) If the Company and the Affected Shareholder cannot agree on a third-party appraisal, they shall both individually choose and pay for their own appraisal and the differences, if any, between the two (2) valuations of the Affected Shareholder's shares shall be averaged and used for calculating the Payoff Note (as such term is defined hereunder).
- (iii) Once the value of the Affected Shareholder's shares is determined in relation to the Company's fair market value, the Company shall deliver a note (the "**Payoff Note**") to the Affected Shareholder for eighty percent (80%) of the fair market value of the Affected Shareholder's shares. The Payoff Note may be payable over a five (5) year period and may bear interest at a rate equal to the prime rate of interest as announced from time-to-time by the Wall Street Journal or may be discounted (using the same rate) to present value if an earlier payoff is required under the applicable laws and regulations. The terms of the Payoff Note may include equal monthly payments and shall be reasonable and customary for a transaction of this type. The Company may sell the Affected Shareholder's shares, in accordance with the terms of these Bylaws, to finance the Payoff Note or for any other lawful reason.

ARTICLE XII

MISCELLANEOUS

12.1 Headings. Section and other headings contained in these Bylaws are for reference purposes only and are not intended to describe, interpret, define or limit the scope of these Bylaws or any provisions hereof.

12.2 Governing Law; Jurisdiction.

(a) These Bylaws and all matters arising herefrom or with respect hereto shall be governed by, and construed in accordance with, the internal laws of the Commonwealth of Massachusetts, without regard to conflicts of laws principles thereof that would require the application of a different law.

(b) Any suit, action or proceeding related to these Bylaws, or any judgment entered by any court related to these Bylaws, may be brought only in any federal or state court of competent jurisdiction in Commonwealth of Massachusetts, and the parties hereby submit to the exclusive jurisdiction of such courts. The parties irrevocably waive any objections which they may now or hereafter have to the laying of venue of any suit, action or proceeding brought in any court of competent jurisdiction in the Commonwealth of Massachusetts, and hereby irrevocably waive any claim that any such action, suit or proceeding has been brought in an inconvenient forum. **THE SHAREHOLDERS AND THE COMPANY EACH HEREBY WAIVE ANY RIGHT TO TRIAL BY JURY.**

12.3 Amendments. These Bylaws may be amended or repealed by the Shareholders. If authorized by the Articles of Organization, the Board of Directors may also make, amend, or repeal these Bylaws in whole or in part, except with respect to any provision of these Bylaws which, by an express provisions of the Act, the Articles of Organization, or these Bylaws, require action by the Shareholders.

12.4 Corporate Seal. The Company shall not be required to affix a corporate seal on any documentation pertaining to the governance or business of the Company. The failure to affix a corporate seal shall not affect the validity of any documents (including, but not limited to, the certificates described in Article VIII of these Bylaws) executed on behalf of the Company.

SCHEDULE A

OFFICERS

Name

Title

Kerry Bourne

President, Treasurer and
Chief Executive Officer

Conor McLaughlin

Secretary and Chief Operating
Officer

Brian McLaughlin, Jr.

Chief Compliance Officer

SCHEDULE B
SHAREHOLDERS

Shareholder:

Ownership:

Kerry Bourne
22 Brentwood Drive
North Easton, MA 02356

60%

Conor McLaughlin
37 Charlotte Avenue
Norton, MA 02766

27%

Brian McLaughlin, Jr.
330 Beacon Street
Boston, MA 02116

10%

Helena Evans
238 Walnut Street
Brookline, MA 02445

3%

Total: 100%

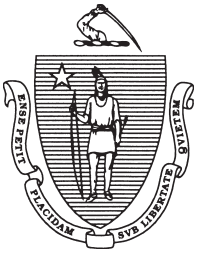
SCHEDULE C

BOARD OF DIRECTORS

Kerry Bourne

Conor McLaughlin

Helena Evans



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

William Francis Galvin
Secretary of the
Commonwealth

Date: January 18, 2022

To Whom It May Concern :

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

RELEAF ALTERNATIVE NATICK, INC.

is a domestic corporation organized on **April 08, 2020** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 22010382330

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

Processed by: bod

**Certificate of Good Standing or Compliance from the Massachusetts
Department of Unemployment Assistance Attestation Form**

Signed under the pains and penalties of perjury, I, Kerry Bourne, an authorized representative of ReLeaf Alternative Natick, Inc., certify that ReLeaf Alternative Natick, Inc. does not currently have employees and is therefore unable to register with the Massachusetts Department of Unemployment Assistance to obtain a Certificate of Good Standing or Compliance.


Signature


Date

Name: Kerry Bourne

Title: President

Entity: ReLeaf Alternative Natick, Inc.



mass.gov/dor

CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



RELEAF ALTERNATIVE NATICK INC
34 BRENTWOOD DR
NORTH EASTON MA 02356-2205

Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, RELEAF ALTERNATIVE NATICK 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, 9:00 a.m. to 4:00 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

650000

PLAN FOR OBTAINING LIABILITY INSURANCE

ReLeaf Alternative Natick, Inc. (“ReLeaf Natick”) will contract with an insurance provider to maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually and product liability coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually. The policy deductible will be no higher than \$5,000 per occurrence. ReLeaf Natick will consider additional coverage based on availability and cost-benefit analysis.

If adequate coverage is unavailable at a reasonable rate, ReLeaf Natick will place in escrow at least \$250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. ReLeaf Natick will keep reports documenting compliance with 935 CMR 500.105(10): *Liability Insurance Coverage or Maintenance of Escrow* in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

reLeaf

ALTERNATIVE

**RELEAF ALTERNATIVE NATICK, INC.
BUSINESS PLAN**

Executive Summary

Mission Statement

ReLeaf Alternative Natick, Inc. (“ReLeaf”) seeks to operate a state-of-the-art Retail Marijuana Establishment in Natick, Massachusetts. ReLeaf is committed to creating a safe, clean and socially responsible environment that provides consistent, high-quality cannabis to consumers who are 21 years of age or older.

Our mission is to provide quality education, experience, and service to the Town of Natick by selling cannabis in a safe environment.

What Drives Us

ReLeaf’s goals include:

1. Providing customers 21 years of age or older with a wide variety of high quality, consistent, laboratory-tested cannabis and derivatives;
2. Assisting Natick in offsetting the cost of ReLeaf’s operations within the community;
3. Hiring employees and contractors from within Natick;
4. Hiring employees and contractors from communities that have been disproportionately impacted by the war on drugs;
5. Having a diverse and socially representative pool of employees;
6. Empowering the next generation of female entrepreneurs and leaders through hiring, training and teaching; and
7. Running an environmentally friendly Marijuana Establishment.

What Sets Us Apart

ReLeaf’s team will utilize their wide breadth of expertise in the cannabis industry, regulated alcohol industry, real estate management and construction, and retail sectors to ensure that its Natick facility operates in a manner that is secure, compliant, and harmonious with the surrounding community.

ReLeaf takes its obligation to educate our consumers and the community at large to heart because we are a family-owned and operated business. As an applicant seeking licensure as a Women-Owned Business from the Massachusetts Supplier Diversity Office, ReLeaf’s priority is the well-being of the community and our customers. ReLeaf’s proprietors, the Bourne/McLaughlin family, have been heavily involved in philanthropic and business endeavors across Massachusetts since the 1970’s.

ReLeaf’s proposal was designed to meet and exceed the *2019 Values and Vision* as developed by the Natick Board of Selectmen. Specifically, ReLeaf believes its proposal furthers:

- Smart Growth and Economic Development – The proposed development is in congruence with the character and vitality of downtown Natick while strengthening the Town’s strong commercial base;
- Quality of Life for All – The proposed development is designed to mitigate nuisance impacts through proactive traffic, queuing, security, and odor plans that would otherwise decrease the quality of life for Natick residents;
- Financial Predictability – The proposed development would yield annual host community agreement revenues in excess of \$670,000 in year one and community giving of over \$100,000; and
Community Governance and Engagement – ReLeaf will play a proactive role in civic, business, and philanthropic initiatives within Natick to ensure it is continually playing a positive role that gives back.

General

ReLeaf intends to create 20-25 full-time and part-time careers within the first three years of operation. As a licensed marijuana retail establishment, we will provide the Natick community with a variety of cannabis products and services. It is our mission to provide education to the consumer on safe cannabis consumption. ReLeaf has a strong moral obligation to responsibly serve patrons safely and securely. We will be heavily focused on charitable activities and social equity initiatives within the town of Natick. As part of our commitment, we are excited to donate a minimum of 150 staff hours annually to participate in community service activities. We will also be actively involved in consumer educational programs, community outreach assistance, and provide charitable donations. ReLeaf looks forward to becoming a pivotal part of the local community and to providing access to cannabis products in a safe environment.

Executive Management Team

Kerry Bourne

From a young age, Kerry has believed in the power of a strong partnership between business and the community in which it operates. From cleaning the store, to being the smiling face greeting customers, to the ranks of management, Kerry started out her business career understanding that every aspect of business touches a community. Kerry is the daughter of a self-made businessman who founded the well-loved D’Angelos Sandwich shops. With locations all over New England, including Natick, the family melded into the landscape of the communities in which it operated. Understanding the importance of a family business to the community in which it operates, Kerry took it upon herself to find future ways to meld these concepts together.

Kerry graduated from Babson College with a BA in business. With the business education behind her, she realized her calling went well beyond the boardroom. She continued her education further at Bridgewater state university taking child education classes to receive her teaching certification and spent the next 6 years as a one-on-one educational specialist. Kerry believed that she could be instrumental in helping people realize their full potential and she worked with a young man to achieve his goals through motivation, assistive technology, and her implementation of creative means of learning.

Utilizing her business education, teaching and leadership skills, Kerry and her husband, Jason, have built a highly successful car dealership, Bourne's Auto Center. They started in 1998 with a small 20 - car lot in Easton, MA employing 3 people. Currently they have 3 locations, over 1000 cars in inventory, over 100 employees, and annual revenues in excess of \$125 million. Kerry has a proven track record in acquiring inventory, marketing, and increasing sales. With their leadership, Bourne's Auto has been named 3 times Massachusetts Dealer of the year. Giving back has also been very important to the Bourne Family. They have established a program called charity of the month and give around \$2,000 every month to national, state, and local charities. For over 20 years, Kerry and her family have been involved with the Genesis Fund, a nonprofit that helps children born with birth defects. She has personally donated and helped raise over \$300,000. Kerry is excited to enter the cannabis field where she knows she can make a difference in the community, employees, and customer lives.

Kerry has also spent much of her time raising four children. With a passion for sports, it led her to leadership roles in Easton Youth Basketball and Easton Youth lacrosse. For the last 8 years she has dedicated herself to teaching kids both on and off the field. She is involved in the community serving on both the hockey and basketball booster boards for the last several years. Kerry has also served on the Oliver Ames Athletic Hall of Fame committee for 15 years.

Being an athlete, coach, educator, and businesswoman, truthfully Kerry was not sure of the legalization of marijuana. Worrying about the safety of the children in our society and the ongoing issues of drug and alcohol abuse, Kerry has weighed the pros and cons of the law. Now that the State has legalized recreational use of marijuana, Kerry's focus is to educate the public to ensure that all cannabis products are used appropriately, in moderation, and safely. Through working with children and as a mother, one of Kerry's main concerns is that marijuana products stay out of the hands of anyone under the age of 21. Kerry is a passionate leader, a successful businesswoman, a community activist, and a team player who wants to build a company that is invested in the community it serves. Kerry's vision is that this company be mission focused, a community player, and one that stands out above and beyond in the safety, education and proper use of all cannabis products.

Conor McLaughlin

Conor began his financial career at Morgan Stanley after graduating from Suffolk University with a Major in Finance, Minor in Accounting and a Certificate in Financial Planning. While at Morgan Stanley, Conor earned his Series 7, Series 66, and Series 33 license to become an active stockbroker as well as Futures and Options trader. Conor stayed with Morgan Stanley until his departure from Boston in 2009, when he transitioned into the hospitality/service industry.

In 2010, Conor became operational manager of his family-owned restaurant and marina. Conor also uses his fall, winter and spring seasons to help his family-owned commercial real estate business. His extensive background in finance and accounting, as well as his experience in hospitality, has led him to be involved with ReLeaf.

His goal is to produce a fiscally responsible, customer friendly facility with an emphasis on safety. Being in the highly regulated industry of on-premises alcohol establishments, Conor has become proficient with dealing with high volume, high stress situations that require calm under pressure and high accountability standards. Conor has been a certified crowd manager for the past 8 years.

Conor has now devoted his time solely to the legal cannabis industry in Massachusetts, where he will be serving as the Chief Financial Officer of ReLeaf Alternative Natick.

Brian J. McLaughlin Jr.

Brian graduated from Boston College cum laude where he served as a campus leader, participating on the committee to hire a new disability coordinator as well as being part of the committee to improve the Master Plan, Boston College's plan to improve accessibility for students with disabilities. Upon graduating from college, Brian attended Boston College Law School where he participated in Mock Trial and volunteered as part of shelter legal services.

Based in Boston, Brian practices in the areas of family law, special education law, disability law, real estate law, and both unemployment and veterans benefits. Born with cerebral palsy, Brian has given countless presentations concerning disabilities and accessibility issues and was cited in the *Boston Globe* as part of a wheelchair accessible task force sting in downtown Boston

Brian is a part of the Child Requiring Assistance program, where he is appointed as a child's lawyer when they are going through difficult legal issues such as parent divorces or trouble with their school. Brian holds children's protections and rights in the utmost regard. Brian currently collaborates with the Volunteer Lawyer Project, helping those who are in need of counsel obtain their unemployment benefits. Brian serves on many the board including Shelter Legal and Assistive Technology Loan Committee. He was also co-chair of the Legal Policy Committee for the Special Needs Advocacy Network (SPAN).

His experience includes working with both the state and federal government. As an Intelligence Analyst for the Federal Bureau of Investigation, Brian received a top-secret security clearance. At the state level, Brian served as an outreach coordinator for the Massachusetts Office on Disability. Brian has served in the private sector for the small litigation firm, Healy & Healy, assisting in civil tort litigation matters, both plaintiff and defendant.

In 2015 he won the Pro Bono Lawyer of the Year award for his extensive and impressive dedication to pro bono cases. He then received a nomination and later was awarded as one of the National Law Journal's Rising Stars in Boston, Massachusetts. Brian's vision for a socially responsible company and experience as lawyer make him an ideal fit for the chief compliance officer position.

Helena Evans

Helena Evans, of the L. B Evans shoe company, was raised in Lincoln, MA with her 5 siblings. She attended Concord Academy followed by Brandeis University where she graduated Magna cum Laude with a BFA in Music and Art. Not long after graduation, Helena moved to Seattle, Washington where she began a family and found her passion for community work. She sang at St. Mark's choir for 17 years, during which time she developed their youth group program and volunteered regularly. She also worked as a librarian at St. Joseph's school, encouraged by the school's mission to develop students who are open to growth, religious, loving, and committed to becoming valued community members. She thrived with the organization and inventory management required of librarians, drawing upon her experience when she worked for the Harvard Business School Library when she was in college.

Her faith and emphasis on education of her students and her son, Luke, are at the core of her values. She now lives in Brookline serving on the board of the Brookline Library Music Association. Donating her time and money heavily within the community, Helena still has time for the arts. She recently finished her latest musical, "Wasp Side Story" performed in Marion, MA and will have a painting exhibited in the Brookline Art Gallery in Coolidge Corner.

Helena has been involved in the cannabis industry for a year. Inspired by Cambridge's Equity provisions within their Cannabis Business Permit process, she sought to bridge the gap between Economic Empowerment applicants and access to funding. Unfortunately litigation from non-Economic Empowerment applicants forced Cambridge to pause all HCAs as of February. While she still holds hope for the Economic Empowerment program, she is thrilled to further women's business interests on the ReLeaf team in Natick.

With a focus on educational development and philanthropic communal advocacy for the Arts and Music, Helena looks to bring a creativity and community focus to the ReLeaf team. With a lifetime commitment to child safety and education, Helena Evans is an Ideal candidate for ReLeaf's executive team.

Company Description

Structure

ReLeaf Alternative Natick, Inc. is a Massachusetts domestic for-profit corporation that is applying for licenses from the Commission to operate Marijuana Establishments in the Commonwealth as a Women-Business Enterprise.

Operations

ReLeaf will establish inventory controls and procedures for the conduct of inventory reviews and comprehensive inventories of marijuana products; conduct a monthly inventory of stored marijuana; conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and promptly transcribe inventories if taken by use of an oral recording device.

ReLeaf will tag and track all marijuana and marijuana products using Metric and in a form and manner approved by the Commission.

No marijuana product, including marijuana, will be sold or otherwise marketed for adult use that has not first been tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

ReLeaf will maintain records, which will be available for inspection by the Commission upon request. The records will be maintained in accordance with generally accepted accounting principles and maintained for at least 12 months or as specified and required by 935 CMR 500.000.

ReLeaf 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, except as provided in 935 CMR 500.105(10)(b) or otherwise approved by the Commission. The deductible for each policy will be no higher than \$5,000 per occurrence. If adequate coverage is unavailable at a reasonable rate, ReLeaf will place in escrow at least \$250,000 to be expended for liabilities coverage (or such other amount approved by the Commission). Any withdrawal from such escrow will be replenished within 10 business days of any expenditure. ReLeaf will keep reports documenting compliance with 935 CMR 500.105(10) in a manner and form determined by the Commission pursuant to 935 CMR 500.000.

ReLeaf will provide adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110.

All recyclables and waste, including organic waste composed of or containing finished marijuana and marijuana products, will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. Organic material, recyclable material, solid waste, and liquid waste containing marijuana or by-products of marijuana processing will be disposed of in compliance with all applicable state and federal requirements.

ReLeaf will demonstrate consideration of the factors for Energy Efficiency and Conservation outlined in 935 CMR 500.105(15) as part of its operating plan and application for licensure.

ReLeaf will place in escrow a sum of no less than \$5,000 or such other amount approved by the Commission, to be expended for coverage of liabilities. The escrow account will be replenished within ten business days of any expenditure required under 935 CMR 500.105: *General Operational Requirements for Marijuana Establishments* unless ReLeaf has ceased operations. Documentation of the replenishment will be promptly sent to the Commission.

ReLeaf and ReLeaf agents will comply with all local rules, regulations, ordinances, and bylaws.

Security

ReLeaf will contract with a professional security and alarm company to design, implement, and monitor a comprehensive security plan to ensure that the facility is a safe and secure environment for employees and the local community.

ReLeaf's state-of-the-art security system will consist of perimeter windows, as well as duress, panic, and holdup alarms connected to local law enforcement for efficient notification and response in the event of a security threat. The system will also include a failure notification system that will immediately alert the executive management team if a system failure occurs. A redundant alarm system will be installed to ensure that active alarms remain operational if the primary system is compromised.

Interior and exterior HD video surveillance of all areas that contain marijuana, entrances, exits, and parking lots will be operational 24/7 and available to the Police Department. These surveillance cameras will remain operational even in the event of a power outage. The exterior of the dispensary and surrounding area will be sufficiently lit, and foliage will be minimized to ensure clear visibility of the area at all times.

Only ReLeaf's registered agents and other authorized visitors (e.g. contractors, vendors) will be allowed access to the facility, and a visitor log will be maintained in perpetuity. All agents and visitors will be required to visibly display an ID badge, and ReLeaf will maintain a current list of individuals with access. ReLeaf will have security personnel on-site during business hours.

On-site consumption of marijuana by ReLeaf's employees and visitors will be prohibited.

Benefits to The community of Natick

ReLeaf looks forward to working cooperatively with the residents and officials in Natick to ensure that ReLeaf operates as a responsible, socially conscious contributing member of the town of Natick.

The Town of Natick stands to benefit in various ways, including but not limited to the following:

1. Jobs: A Marijuana Establishment facility will add a number of full-time jobs, in addition to hiring qualified, local contractors and vendors.
2. Monetary Benefits: A Host Community Agreement with significant monetary donations will provide the host community with additional financial benefits beyond local property taxes.
3. Access to Quality Product: ReLeaf will allow qualified consumers in the Commonwealth to have access to high quality marijuana and marijuana products that are tested for cannabinoid content and contaminants.
4. Control: In addition to the Commission, the Police Department and other municipal departments will have oversight over ReLeaf's security systems and processes.
5. Responsibility: ReLeaf will be comprised of experienced professionals who will be thoroughly background checked and scrutinized by the Commission.
6. Economic Development: ReLeaf's operation of its facilities will help to contribute to the overall economic development of Natick and contribute substantial benefit to local organizations, who have already been contacted and support can begin right away.
7. Educational Component: ReLeaf is committed to delivering educational material to ensure product is used safely and responsibly by qualified adult consumers and to support local organizations in Natick committed to combating the opioid crisis affecting the country.

Market Research

Customers

ReLeaf will only sell marijuana and marijuana products to consumers who are 21 years and older that provide valid identification.

Our Financial Security

- ReLeaf is a privately funded corporation with no outside investors except for family. Institutional financing will not be required.
- ReLeaf has substantial cash reserves immediately available and additional lines of credit available if necessary.

- ReLeaf will establish a banking relationship with Bay Coast Bank to ensure daily deposits of all sales transactions.
- ReLeaf is a formidable group holding no debt which will ensure the Town of Natick a partner that will provide, consistent, uninterrupted, and secure business.
- ReLeaf is prepared to offer substantial financial benefit to the community upon acceptance and execution of a Community Host Agreement.

Our Location

Brian McLaughlin, Dangelo Inc. Founder, has been a property owner in Natick since 1982 with the construction and operation of Dangelo's Sandwich Shops. Mr. McLaughlin sold Dangelo's in 1996 but has maintained ownership of 381 Worcester Street. Located a quarter mile away on the same side of the street, this lot has 30+ parking spaces, 15 of which can be utilized as employee parking with a shuttle van available.

Recently acquired by Brian McLaughlin for ReLeaf Alternative, 291 Worcester St. is a premiere location that is positioned to attract strong patronage. These parcels will ensure a positive financial impact for the town of Natick and its residents. With no residential housing within 300 ft., this freestanding building is set back from the road and offers attractive buffer areas between neighboring parcels with virtually no residential impact. The property is in the Retail Marijuana Overlay District, allowing adult use retail cannabis dispensary, and is strategically positioned on Rt. 9 East with ample parking.

- Building Area – 2,926 sq. ft.
- No lines – expanded waiting area inside
- 51 – parking spaces at the location, including 3 handicap spots and an additional 15 employee parking spaces on a neighboring parcel.
- Appointment only system as needed and at the direction of the town
- Ample parking on-site
- Commercially zoned building
- Over 300 ft. from parks, schools, residents, the Natick Mall and Downtown Natick
- Serviced by Rt. 9 access, 25,000 cars per day

Regulations

ReLeaf Alternative Natick Inc. is a Massachusetts domestic for-profit corporation. ReLeaf will maintain the corporation in good standing with the Massachusetts Secretary of the Commonwealth, the Department of Revenue, and the Department of Unemployment Assistance. ReLeaf will apply for all state and local permits and approvals required to build out and operate the facility.

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

Products & Services

In addition to traditional sativa, indica, and hybrid cannabis flower, ReLeaf will offer a wide range of products that will allow ReLeaf to serve customers with a wide variety of needs. Products ReLeaf intends to offer include, but will not be limited to:

- Concentrates
- Topical Salves
- Creams and Lotions
- Patches
- Oral Mucosal and Sublingual Dissolving Tablets
- Tinctures
- Sprays
- Inhalation Ready to Use CO2 Extracted Hash Oils
- Pre-Dosed Oil Vaporizers
- Ingestion Capsules
- Infused Food and Beverages
- Suppositories

Pricing Structure

ReLeaf's pricing structure will vary based on market conditions. ReLeaf plans to provide products of superior quality and will price accordingly.

Marketing & Sales

Growth Strategy

ReLeaf's plan to grow the company includes:

- Strong and consistent branding;
- Intelligent, targeted, and compliant marketing programs;
- An exemplary customer in-store experience; and
- A caring and thoughtful staff made of consummate professionals.

Communication

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

All marketing, advertising, and branding produced by or on behalf of ReLeaf will include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½)(xxvi): "This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is

limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA.”

ReLeaf will seek events where 85% or more of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data. At these events, ReLeaf will market its products and services to reach a wide range of qualified consumers.

ReLeaf will communicate with customers through:

- A company run website;
- A company blog;
- Popular cannabis discovery networks such as Weed Maps and Leafly;
- Popular social media platforms such as Instagram, Facebook, Twitter, and SnapChat; and
- Opt-in direct communications.

ReLeaf will provide a catalogue and a printed list of the prices and strains of marijuana available to consumers and will post the same catalogue and list on its website and in the retail store.

Sales

ReLeaf will sell its products and services by engaging customers with knowledgeable personnel and creating brand recognition through superior innovative products and extensive market research on customer’s needs.

ReLeaf will ensure that all marijuana products that are provided for sale to consumers are sold in tamper or child-resistant packaging. Packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, will not be attractive to minors.

Packaging for marijuana products sold or displayed for consumers in multiple servings will allow a consumer to easily perform the division into single servings and include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica, or Arial, including capitalization: “INCLUDES MULTIPLE SERVINGS.” ReLeaf will not sell multiple serving beverages and each single serving of an edible marijuana product contained in a multiple-serving package will be marked, stamped, or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product. In no instance will an individual serving size of any marijuana product contain more than five (5) milligrams of delta-nine tetrahydrocannabinol.

Logo

ReLeaf has developed a logo to be used in labeling, signage, and other materials such as letterhead and distributed materials. The logo is discreet, unassuming, and does not use medical

symbols, images of marijuana, related paraphernalia, or colloquial references to cannabis or marijuana.

An image of the logo can be found below:



Final Remarks

ReLeaf has the experience and know-how to safely and efficiently provide high quality, consistent, laboratory-tested cannabis and derivatives. ReLeaf hopes to bring its high-quality standards to adult-use consumers to provide them with a safe and clean community environment. ReLeaf's security systems and comprehensive security measures will also help ensure a safe and secure environment that will help deter and prevent diversion.

In Massachusetts, adult-use sales eclipsed \$2 billion in September 2021, less than three years after adult-use sales began in the Commonwealth. As more Marijuana Establishments become operational, the sales growth rate continues to expand month after month. ReLeaf has positioned itself well in this market and will contribute to this growth through a highly experienced team of successful operators working under an established framework of high-quality standard operating procedures and growth strategies. In doing so, ReLeaf looks forward to working cooperatively with all the municipalities in which it is operating to help spread the benefits that this market will yield.

PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

Pursuant to 935 CMR 500.050(8)(b), ReLeaf Alternative Natick, Inc. (“ReLeaf Natick”) will only be accessible to individuals, visitors, and agents who are 21 years of age or older with a verified and valid government-issued photo ID. Upon entry into the premises of the marijuana establishment by an individual, visitor, or agent, a ReLeaf Natick agent will immediately inspect the person’s proof of identification and determine the person’s age, in accordance with 935 CMR 500.140(2).

In the event ReLeaf Natick discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1)(m). ReLeaf Natick will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors in the Commonwealth or a like violation of the laws in other jurisdictions, pursuant to 935 CMR 500.030(1).

Pursuant to 935 CMR 500.105(4), ReLeaf Natick will not engage in any advertising practices that are targeted to, deemed to appeal to or portray minors under the age of 21. ReLeaf Natick will not engage in any advertising by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, including sponsorship of charitable, sporting or similar events, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data. ReLeaf Natick will not manufacture or sell any edible products that resemble a realistic or fictional human, animal, fruit, or sporting-equipment item including artistic, caricature or cartoon renderings, pursuant to 935 CMR 500.150(1)(b). In accordance with 935 CMR 500.105(4)(a)(5), any advertising created for public viewing will include a warning stating, **“For use only by adults 21 years of age or older. Keep out of the reach of children. Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of marijuana. Please Consume Responsibly.”** Pursuant to 935 CMR 500.105(6)(b), ReLeaf Natick packaging for any marijuana or marijuana products will not use bright colors, defined as colors that are “neon” in appearance, resemble existing branded products, feature cartoons, a design, brand or name that resembles a non-cannabis consumer or celebrities commonly used to market products to minors, feature images of minors or other words that refer to products commonly associated with minors or otherwise be marketed to minors. ReLeaf Natick’s website will require all online visitors to verify they are 21 years of age or older prior to accessing the website, in accordance with 935 CMR 500.105(4)(b)(13).

QUALITY CONTROL AND TESTING

Quality Control

ReLeaf Alternative Natick, Inc. (“ReLeaf Natick”) will comply with the following sanitary requirements:

1. Any ReLeaf Natick agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any ReLeaf Natick agent working in direct contact with preparation of marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
 - a. Maintaining adequate personal cleanliness; and
 - b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. ReLeaf Natick’s hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in ReLeaf Natick’s production areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. ReLeaf Natick’s facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. ReLeaf Natick will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. ReLeaf Natick’s floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. ReLeaf Natick’s facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. ReLeaf Natick’s buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. ReLeaf Natick will ensure that all contact surfaces, including utensils and equipment, will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils will be so designed and of such material and workmanship as to be adequately cleanable;
10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products. Toxic items will not be stored in an area containing products used in the cultivation of marijuana. ReLeaf Natick acknowledges and understands that the Commission may require ReLeaf Natick to demonstrate the intended and actual use of any toxic items found on ReLeaf Natick’s premises;

11. ReLeaf Natick will ensure that its water supply is sufficient for necessary operations, and that any private water source will be capable of providing a safe, potable, and adequate supply of water to meet ReLeaf Natick's needs;
12. ReLeaf Natick's plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and wastewater lines;
13. ReLeaf Natick will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. ReLeaf Natick will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. ReLeaf Natick will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

ReLeaf Natick's vehicles and transportation equipment used in the transportation of marijuana products or edibles requiring temperature control for safety will be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana products or edibles from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c).

ReLeaf Natick will ensure that ReLeaf Natick's facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

ReLeaf Natick will follow established policies and procedures for handling voluntary and mandatory recalls of marijuana products. Such procedures are sufficient to deal with recalls due to any action initiated at the request or order of the Commission, and any voluntary action by ReLeaf Natick to remove defective or potentially defective marijuana products from the market, as well as any action undertaken to promote public health and safety.

Any inventory that becomes outdated, spoiled, damaged, deteriorated, mislabeled, or contaminated will be disposed of in accordance with the provisions of 935 CMR 500.105(12), and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

Testing

ReLeaf Natick will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will 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.

Any Independent Testing Laboratory relied upon by ReLeaf Natick for testing will be licensed or registered by the Commission and (i) currently and validly licensed under 935 CMR 500.101: *Application Requirements*, or formerly and validly registered by the Commission; (ii) accredited

to ISO 17025:2017 or the most current International Organization for Standardization 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Accrediting Cooperation mutual recognition arrangement or that is otherwise approved by the Commission; (iii) independent financially from any Medical Marijuana Treatment Center, Marijuana Establishment or Licensee; and (iv) qualified to test marijuana and marijuana products, including marijuana-infused products, in compliance with M.G.L. c. 94C, § 34; M.G.L. c. 94G, § 15; 935 CMR 500.000: *Adult Use of Marijuana*; 935 CMR 501.000: *Medical Use of Marijuana*; and Commission protocol(s).

Testing of ReLeaf Natick's marijuana products will be performed by an Independent Testing Laboratory in compliance with a protocol(s) established in accordance with M.G.L. c. 94G, § 15 and in a form and manner determined by the Commission, including but not limited to, the *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*. Testing of ReLeaf Natick's environmental media will be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries* published by the Commission.

ReLeaf Natick's marijuana will be tested for the cannabinoid profile and for contaminants as specified by the Commission including, but not limited to, mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides. In addition to these contaminant tests, final ready-to-sell Marijuana Vaporizer Products shall be screened for heavy metals and Vitamin E Acetate (VEA) in accordance with the relevant provisions of the *Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations*. ReLeaf Natick acknowledges and understands that the Commission may require additional testing.

ReLeaf Natick's policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1) will include notifying the Commission (i) within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch and (ii) of any information regarding contamination as specified by the Commission immediately upon request by the Commission. Such notification will be from both ReLeaf Natick and the Independent Testing Laboratory, separately and directly, and will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

ReLeaf Natick will maintain testing results in compliance with 935 CMR 500.000 *et seq* and the record keeping policies described herein and will maintain the results of all testing for no less than one year. ReLeaf Natick acknowledges and understands that testing results will be valid for a period of one year, and that marijuana or marijuana products with testing dates in excess of one year shall be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of ReLeaf Natick's marijuana at a laboratory providing marijuana testing services will comply with 935

CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to ReLeaf Natick for disposal or by the Independent Testing Laboratory disposing of it directly. All Single-servings of marijuana products will be tested for potency in accordance with 935 CMR 500.150(4)(a) and subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

Any marijuana or marijuana products that fail any test for contaminants must either be reanalyzed without remediation, remediated or disposed of. In the event marijuana or marijuana products are reanalyzed, a sample from the same batch shall be submitted for reanalysis at the ITL that provided the original failed result. If the sample passes all previously failed tests at the initial ITL, an additional sample from the same batch previously tested shall be submitted to a second ITL other than the initial ITL for a Second Confirmatory Test. To be considered passing and therefore safe for sale, the sample must have passed the Second Confirmatory Test at a second ITL. Any Marijuana or Marijuana Product that fails the Second Confirmatory Test will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees without first being remediated. Otherwise, any such product shall be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal*.

If marijuana or marijuana products are destined for remediation, a new test sample will be submitted to a licensed ITL, which may include the initial ITL for a full-panel test. Any failing Marijuana or Marijuana Product may be remediated a maximum of two times. Any Marijuana or Marijuana Product that fails any test after the second remediation attempt will not be sold, transferred or otherwise dispensed to Consumers, Patients or Licensees and will be destroyed in compliance with 935 CMR 500.105(12): *Waste Disposal*.

Quality Control Samples

Quality Control Samples provided to employees may not be consumed on ReLeaf Natick's Premises nor may they be sold to another licensee or Consumer. Quality Control Samples will be tested in accordance with 935 CMR 500.160: Testing of Marijuana and Marijuana Products. ReLeaf Natick will limit the Quality Control Samples provided to all employees in a calendar month period to the following aggregate amounts:

1. Five grams of Marijuana concentrate or extract, including but not limited to tinctures;
2. Five hundred milligrams of Edibles whereby the serving size of each individual sample does not exceed five milligrams and otherwise satisfies the potency levels set forth in 935 CMR 500.150(4): Dosing Limitations; and
3. Five units of sale per Cannabis product line and no more than six individual Cannabis product lines. For purposes of 935 CMR 500.130(8): Vendor Samples, a Cannabis product line shall mean items bearing the same Stock Keeping Unit Number.

If Quality Control Samples are provided as Vendor Samples pursuant to 935 CMR 500.130(8), they will be assigned a unique, sequential alphanumeric identifier and entered into the Seed-to-sale SOR in a form and manner to be determined by the Commission, and further, shall be designated as "Quality Control Sample."

Quality Control Samples will have a legible, firmly Affixed label on which the wording is no less than 1/16 inch in size containing at minimum the following information:

1. A statement that reads: “QUALITY CONTROL SAMPLE NOT FOR RESALE”;
2. The name and registration number of the Marijuana Product Manufacturer;
3. The quantity, net weight, and type of Marijuana flower contained within the package; and
4. A unique sequential, alphanumeric identifier assigned to the Production Batch associated with the Quality Control Sample that is traceable in the Seed-to-sale SOR.

Upon providing a Quality Control Sample to an employee, ReLeaf Natick will record:

1. The reduction in quantity of the total weight or item count under the unique alphanumeric identifier associated with the Quality Control Sample;
2. The date and time the Quality Control Sample was provided to the employee;
3. The agent registration number of the employee receiving the Quality Control Sample; and
4. The name of the employee as it appears on their agent registration card.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Overview

ReLeaf Alternative Natick, Inc. (“ReLeaf Natick”) will securely maintain personnel records, including registration status and background check records. ReLeaf Natick will keep, at a minimum, the following personnel records:

- Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
- A personnel record for each marijuana establishment agent;
- A staffing plan that will demonstrate accessible business hours and safe operating conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030.

Agent Personnel Records

In compliance with 935 CMR 500.105(9), personnel records for each agent will be maintained for at least twelve (12) months after termination of the agent’s affiliation with ReLeaf Natick and will include, at a minimum, the following:

- All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
- Documentation of verification of references;
- The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
- Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- Documentation of periodic performance evaluations;
- A record of any disciplinary action taken;
- Notice of completed responsible vendor and eight-hour related duty training; and
- Results of initial background investigation, including CORI reports.

Personnel records will be kept in a secure location to maintain confidentiality and be only accessible to the agent’s manager or members of the executive management team.

Agent Background Checks

- In addition to completing the Commission’s agent registration process, all agents hired to work for ReLeaf Natick will undergo a detailed background investigation prior to being granted access to a ReLeaf Natick facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for ReLeaf Natick pursuant to 935 CMR 500.030 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.
- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.030, ReLeaf Natick will consider:

- a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) 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 include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will 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 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.
- 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, ReLeaf Natick will:
 - a. Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination.
 - b. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, ReLeaf Natick will consider the following factors:
 - i. Time since the offense or incident;
 - ii. Age of the subject at the time of the offense or incident;
 - iii. Nature and specific circumstances of the offense or incident;
 - iv. Sentence imposed and length, if any, of incarceration, if criminal;
 - v. Penalty or discipline imposed, including damages awarded, if civil or administrative;
 - vi. Relationship of offense or incident to nature of work to be performed;
 - vii. Number of offenses or incidents;
 - viii. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
 - ix. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and
 - x. Any other relevant information, including information submitted by the subject.
 - c. 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 the DCJIS.

- All suitability determinations will be documented in compliance with all requirements set forth in 935 CMR 500 et seq. and guidance provided by the Commission.
- Background screening will be conducted by an investigative firm holding the National Association of Professional Background Screeners (NAPBS®) Background Screening Credentialing Council (BSCC) accreditation and capable of performing the searches required by the regulations and guidance provided by the Commission.
- References provided by the agent will be verified at the time of hire.
- As a condition of their continued employment, agents, volunteers, contractors, and subcontractors are required to renew their Program ID cards annually and submit to other background screening as may be required by ReLeaf Natick or the Commission.

Personnel Policies and Training

As outlined in ReLeaf Natick’s Record Keeping Procedures, a staffing plan and staffing records will be maintained in compliance with 935 CMR 500.105(9) and will be made available to the Commission, upon request. All ReLeaf Natick agents are required to complete training as detailed in ReLeaf Natick’s Qualifications and Training plan which includes but is not limited to ReLeaf Natick’s strict alcohol, smoke and drug-free workplace policy, job specific training, Responsible Vendor Training Program, confidentiality training including how confidential information is maintained at the marijuana establishment and a comprehensive discussion regarding the marijuana establishment’s policy for immediate dismissal. All training will be documented in accordance with 935 CMR 105(9)(d)(2)(d).

ReLeaf Natick will have a policy for the immediate dismissal of any dispensary agent who has:

- Diverted marijuana, which will be reported the Police Department and to the Commission;
- Engaged in unsafe practices with regard to ReLeaf Natick operations, which will be reported to the Commission; or
- 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.

RECORDKEEPING PROCEDURES

General Overview

ReLeaf Alternative Natick, Inc. (“ReLeaf Natick”) has established policies regarding recordkeeping and record-retention in order to ensure the maintenance, safe keeping, and accessibility of critical documents. Electronic and wet signatures are accepted forms of execution of ReLeaf Natick documents. Records will be stored at ReLeaf Natick in a locked room designated for record retention. All written records will be available for inspection by the Commission upon request.

Recordkeeping

To ensure that ReLeaf Natick is keeping and retaining all records as noted in this policy, reviewing Corporate Records, Business Records, and Personnel Records to ensure completeness, accuracy, and timeliness of such documents will occur as part of ReLeaf Natick’s quarter-end closing procedures. In addition, ReLeaf Natick’s operating procedures will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis.

- Corporate Records

Corporate Records are defined as those records that require, at a minimum, annual reviews, updates, and renewals, including:

- Insurance Coverage:
 - Directors & Officers Policy
 - Product Liability Policy
 - General Liability Policy
 - Umbrella Policy
 - Workers Compensation Policy
 - Employer Professional Liability Policy
- Third-Party Laboratory Contracts
- Commission Requirements:
 - Annual Agent Registration
 - Annual Marijuana Establishment Registration
- Local Compliance:
 - Certificate of Occupancy
 - Special Permits
 - Variances
 - Site Plan Approvals
 - As-Built Drawings
- Corporate Governance:
 - Annual Report
 - Secretary of Commonwealth Filings

- Business Records

Business Records require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:

- Assets and liabilities;
- Monetary transactions;

- Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
- Sales records including the quantity, form, and cost of marijuana products;
- Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over ReLeaf Natick.
- Personnel Records
At a minimum, Personnel Records will include:
 - Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
 - A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with ReLeaf Natick and will include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - Documentation of verification of references;
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - Documentation of periodic performance evaluations; and
 - A record of any disciplinary action taken.
 - Notice of completed responsible vendor and eight-hour related duty training.
 - A staffing plan that will demonstrate accessible business hours and safe operating conditions;
 - Personnel policies and procedures; and
 - All background check reports obtained in accordance with 935 CMR 500.030: Registration of Marijuana Establishment Agents 803 CMR 2.00: Criminal Offender Record Information (CORI).
- Handling and Testing of Marijuana Records
 - ReLeaf Natick will maintain the results of all testing for a minimum of one (1) year.
- Inventory Records
 - The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Seed-to-Sale Tracking Records
 - ReLeaf Natick will use Metrc as the seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(e), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation,

flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.

- Sales Records for Marijuana Retailer

- ReLeaf Natick will maintain records that it has performed 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 the sales data and produce such records on request to the Commission.

- Incident Reporting Records

- Within ten (10) calendar days, ReLeaf Natick will provide notice to the Commission of any incident described in 935 CMR 500.110(9)(a), by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified within twenty-four (24) hours of discovering the breach or incident .
- All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a) will be maintained by ReLeaf Natick for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities within ReLeaf Natick's jurisdiction on request.

- Visitor Records

- A visitor sign-in and sign-out log will be maintained at the security office. The log will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.

- Waste Disposal Records

- When marijuana or marijuana products are disposed of, ReLeaf Natick will create and maintain an electronic record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two ReLeaf Natick agents present during the disposal or other handling, with their signatures. ReLeaf Natick will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.

- Security Records

- A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
- Recordings from all video cameras which shall be enabled to record twenty-four (24) hours each day shall be available for immediate viewing by the Commission on request for at least the preceding ninety (90) calendar days or the duration of a request to preserve the recordings for a specified period of time made by the Commission, whichever is longer.
- Recordings shall not be destroyed or altered and shall be retained as long as necessary if ReLeaf Natick is aware of pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information.

- Transportation Records
 - ReLeaf Natick will retain all transportation manifests for a minimum of one (1) year and make them available to the Commission upon request.
- Vehicle Records (as applicable)
 - Records that any and all of ReLeaf Natick's vehicles are properly registered, inspected, and insured in the Commonwealth and shall be made available to the Commission on request.
- Agent Training Records
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).
- Responsible Vendor Training
 - ReLeaf Natick shall maintain records of Responsible Vendor Training Program compliance for four (4) years and make them available to inspection by the Commission and any other applicable licensing authority on request during normal business hours.
- Closure
 - In the event ReLeaf Natick closes, all records will be kept for at least two (2) years at ReLeaf Natick's expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, ReLeaf Natick will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.
- Written Operating Policies and Procedures

Policies and Procedures related to ReLeaf Natick's operations will be updated on an ongoing basis as needed and undergo a review by the executive management team on an annual basis. Policies and Procedures will include the following:

 - Security measures in compliance with 935 CMR 500.110;
 - Employee security policies, including personal safety and crime prevention techniques;
 - A description of ReLeaf Natick's hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
 - Storage of marijuana in compliance with 935 CMR 500.105(11);
 - Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;
 - Price list for Marijuana and Marijuana Products, and alternate price lists for patients with documented Verified Financial Hardship as defined in 501.002: *Definitions*, as required by 935 CMR 501.100(1)(f);
 - Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);
 - Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
 - A staffing plan and staffing records in compliance with 935 CMR 500.105(9)(d);
 - Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;

- Alcohol, smoke, and drug-free workplace policies;
- A plan describing how confidential information will be maintained;
- Policy for the immediate dismissal of any dispensary agent who has:
 - Diverted marijuana, which will be reported to Law Enforcement Authorities and to the Commission;
 - Engaged in unsafe practices with regard to ReLeaf Natick operations, which will be reported to the Commission; or
 - 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.
- A list of all board of directors, members, and executives of ReLeaf Natick, and members, if any, of the licensee must be made available upon request by any individual. This requirement may be fulfilled by placing this information on ReLeaf Natick's website.
- Policies and procedures for the handling of cash on ReLeaf Natick premises including but not limited to storage, collection frequency and transport to financial institution(s), to be available upon inspection.
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- Policies and procedures for energy efficiency and conservation that will include:
 - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
 - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
 - Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.
- Policies and procedures to promote workplace safety consistent with applicable standards set by the Occupational Safety and Health Administration, including plans to identify and address any biological, chemical or physical hazards. Such policies and procedures shall include, at a minimum, a hazard communication plan, personal protective equipment assessment, a fire protection plan, and an emergency action plan.
- License Renewal Records
 - ReLeaf Natick shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city's or town's anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should

include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

Record-Retention

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

MAINTAINING OF FINANCIAL RECORDS

ReLeaf Alternative Natick, Inc.'s ("ReLeaf Natick") operating policies and procedures ensure financial records are accurate and maintained in compliance with the Commission's Adult Use of Marijuana regulations (935 CMR 500). Financial records maintenance measures include policies and procedures requiring that:

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
 - Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products; and
 - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over ReLeaf Natick.
- All sales recording requirements under 935 CMR 500.140(5) are followed, including:
 - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
 - Prohibiting the use of software or other methods to manipulate or alter sales data;
 - Conducting a monthly analysis of its equipment and sales data, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
 - If ReLeaf Natick determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data: 1. it shall immediately disclose the information to the Commission; 2. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and 3. take such other action directed by the Commission to comply with 935 CMR 500.105.
 - Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
 - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales;
 - Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.

- Additional written business records will be kept, including, but not limited to, records of:
 - Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
 - Fees paid under 935 CMR 500.005 or any other section of the Commission’s regulations; and
 - Fines or penalties, if any, paid under 935 CMR 500.360 or any other section of the Commission’s regulations.
- License Renewal Records
 - ReLeaf Natick shall keep and submit as a component of the renewal application documentation that the establishment requested from its Host Community the records of any cost to a city or town reasonably related to the operation of the establishment, which would include the city’s or town’s anticipated and actual expenses resulting from the operation of the establishment in its community. The applicant shall provide a copy of the electronic or written request, which should include the date of the request, and either the substantive response(s) received or an attestation that no response was received from the city or town. The request should state that, in accordance with M.G.L. c. 94G, § 3(d), any cost to a city or town imposed by the operation of a Marijuana Establishment or MTC shall be documented and considered a public record as defined by M.G.L. c. 4, § 7, cl. 26.

QUALIFICATIONS AND TRAINING

ReLeaf Alternative Natick, Inc. (“ReLeaf Natick”) will ensure that all employees hired to work at a ReLeaf Natick facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner. ReLeaf Natick will maintain a list of anticipated positions and their qualifications.

Qualifications

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

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

Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of ReLeaf Natick’s agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent’s job function. A ReLeaf Natick Agent will receive a total of eight (8) hours of training annually. A minimum of four (4) hours of training will be from Responsible Vendor Training Program (“RVT”) courses established under 935 CMR 500.105(2)(b). Any additional RVT over four (4) hours may count towards the required eight (8) hours of training.

Non-RVT may be conducted in-house by ReLeaf Natick or by a third-party vendor engaged by the ReLeaf Natick. Basic on-the-job training in the ordinary course of business may also be counted towards the required eight (8) hour training.

All ReLeaf Natick Agents that are involved in the handling or sale of marijuana at the time of licensure or renewal of licensure will have attended and successfully completed the mandatory Responsible Vendor Training Program operated by an education provider accredited by the Commission.

Basic Core Curriculum

ReLeaf Natick Agents must first take the Basic Core Curriculum within 90 days of hire, which includes the following subject matter:

- Marijuana's effect on the human body, including:
 - Scientifically based evidence on the physical and mental health effects based on the type of Marijuana Product;
 - The amount of time to feel impairment;
 - Visible signs of impairment; and

- Recognizing the signs of impairment.
- Diversion prevention and prevention of sales to minors, including best practices.
- Compliance with all tracking requirements.
- Acceptable forms of identification. Training must include:
 - How to check identification;
 - Spotting and confiscating fraudulent identification;
 - Common mistakes made in identification verification.
 - Prohibited purchases and practices, including purchases by persons under the age of 21 in violation of M.G.L. c. 94G, § 13.
- Other key state laws and rules affecting ReLeaf Natick Agents which shall include:
 - Conduct of ReLeaf Natick Agents;
 - Permitting inspections by state and local licensing and enforcement authorities;
 - Local and state licensing and enforcement, including registration and license sanctions;
 - Incident and notification requirements;
 - Administrative, civil, and criminal liability;
 - Health and safety standards, including waste disposal;
 - Patrons prohibited from bringing marijuana and marijuana products onto licensed premises;
 - Permitted hours of sale;
 - Licensee responsibilities for activities occurring within licensed premises; xix. Maintenance of records, including confidentiality and privacy; and
 - Such other areas of training determined by the Commission to be included in a Responsible Vendor Training Program.

ReLeaf Natick will encourage administrative employees who do not handle or sell marijuana to take the “Responsible Vendor” program on a voluntary basis to help ensure compliance. ReLeaf Natick’s records of Responsible Vendor Training Program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other applicable licensing authority on request.

After successful completion of the Basic Core Curriculum, each ReLeaf Natick Agent involved in the handling or sale of marijuana will fulfill the four-hour RVT requirement every year thereafter for ReLeaf Natick to maintain designation as a Responsible Vendor. Once the ReLeaf Natick Agent has completed the Basic Core Curriculum, the Agent is eligible to take the Advanced Core Curriculum. Failure to maintain Responsible Vendor status is grounds for action by the Commission.

ENERGY COMPLIANCE PLAN

ReLeaf Alternative Natick, Inc. (“ReLeaf Natick”) is currently exploring potential energy-use reduction opportunities such as natural lighting and energy efficiency measures and a plan for implementation of such opportunities. ReLeaf Natick will update this plan as necessary and will further provide relevant documentation to the Commission during Architectural Review and during inspections processes.

Potential Energy-Use Reduction Opportunities

ReLeaf Natick is considering the following potential opportunities for energy-use reduction and plans for implementation of such opportunities.

1. Natural Lighting;
2. Energy efficient exterior wall construction, which may include batt insulation, continuous rigid insulation, and air and vapor barriers; and
3. Plumbing fixtures that are Water Sense rated for reduced water consumption.

As the need and opportunity for facility upgrades and maintenance arise in the future and the company becomes cash flow positive, ReLeaf Natick will continue to evaluate energy-use reduction opportunities.

Renewable Energy Generation Opportunities

ReLeaf Natick is in the process of considering opportunities for renewable energy generation (including wind and solar options). ReLeaf Natick’s preliminary examination of renewable energy generation has determined that the upfront costs of such options are too expensive at this time, although ReLeaf Natick may reconsider at a future date. ReLeaf Natick will also consult with its architects and engineers when designing the facility to determine the building’s capacity for renewable energy options (e.g. whether or not the roof can support the weight of solar panels). Nevertheless, our team is dedicated to consistently strive for sustainability and emissions reduction.

Strategies to Reduce Electric Demand

ReLeaf Natick is considering the following strategies to reduce electric demand:

1. Exterior and interior glazing on windows such that maximum natural daylight can enter the building without compromising security, reducing the reliance on artificial light during daytime hours;
2. Lighting fixtures that are energy efficient and used with Energy Star rated bulbs; and
3. Room lighting and switching will have occupancy sensors to reduce electrical consumption when rooms are unoccupied.

As the need and opportunity for facility upgrades and maintenance arise in the future and the company becomes cash flow positive, ReLeaf Natick will continue to evaluate strategies to reduce electric demand.

Opportunities for Engagement with Energy Efficiency Programs

ReLeaf Natick also plans on engaging with energy efficiency programs offered by Mass Save and the Massachusetts Clean Energy Center and will coordinate with municipal officials to

identify other potential energy saving programs and initiatives. ReLeaf Natick will also coordinate with its utility companies to explore any energy efficiency options available to ReLeaf Natick.

DIVERSITY PLAN

Statement of Purpose

As pioneers in an emerging business sector in Massachusetts, ReLeaf Alternative Natick, Inc. (“ReLeaf Natick”) recognizes that it has the unique opportunity to implement an intentional, inclusive, and diverse business model that will set the standard for the Commonwealth’s cannabis industry. As a women-owned business seeking a WBE certification, ReLeaf Natick has a deep-rooted commitment to establishing a Diversity Plan that makes purposeful strides towards ensuring that diverse participants and groups are afforded equality of opportunity at all levels of employment or contractual relationship.

Goals

In order for ReLeaf Natick to promote equity for the above-listed groups in its operations, ReLeaf Natick has established the following goals:

- Ensure that 50% of its employees are women; 20% of its employees identify as minorities; 10 % are veterans; 10% identify as LGBTQ+; and 5% are persons with disabilities; and
- Utilize at least 25% of vendors that are Certified Businesses registered with the Massachusetts Supplier Diversity Office (5% Minority Business Enterprises; 5% Women Business Enterprises; 5% Veteran Business Enterprises; 5% Lesbian Gay Bisexual Transgender Enterprises; and 5% Disability-Owned Business Enterprises).

Programs

ReLeaf Natick has developed specific programs to effectuate its stated goals to promote diversity and equity in its operations, which will include the following:

- Advertising open job positions as they become available (but not less than annually) in diverse publications, such as DiversityJobs.com and HirePurpose.com;
- Identifying vendors through the procurement process that are registered with the Massachusetts Supplier Diversity Office:
 - With each procurement process, ReLeaf Natick will use the Supplier Diversity Office’s Directory of Certified Businesses to identify relevant vendors that are MBEs, WBEs, VBEs, LGBTBEs, and DOBEs.

Measurements

The Chief Operating Officer will administer the Plan and will be responsible for developing measurable outcomes to ensure ReLeaf Natick continues to meet its commitments. Such measurable outcomes, in accordance with ReLeaf Natick’s goals and programs described above, include:

- Completing a comprehensive employee demographic survey to evidence compliance with the following goals:
 - 50% of employees are women;
 - 20% of employees are minorities;
 - 10% of employees are veterans;
 - 10% of employees identify as LGBTQ+; and
 - 5% of employees are persons with disabilities
- Documenting job advertisements placed with diverse publications;

- Recording the percentage of suppliers utilized that are registered with the SDO as MBEs, WBEs, VBEs, LGBTBEs, and VBEs; and
- Completing a comprehensive description of all efforts made by ReLeaf Natick to monitor and enforce the Diversity Plan.

Beginning upon receipt of ReLeaf Natick's first Provisional License from the Commission to operate a marijuana establishment in the Commonwealth, ReLeaf Natick will utilize the proposed measurements to assess its Plan and will account for demonstrating proof of success or progress of the Plan upon the yearly renewal of the license. The Chief Operating Officer will review and evaluate ReLeaf Natick's measurable outcomes no less than twice annually to ensure that ReLeaf Natick is meeting its commitments. ReLeaf Natick is mindful that demonstration of the Plan's progress and success will be submitted to the Commission upon renewal.

Acknowledgements

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