



Massachusetts Cannabis Control Commission

Marijuana Retailer

General Information:

License Number: MR284805
Original Issued Date: 12/13/2024
Issued Date: 12/13/2024
Expiration Date: 12/13/2025

ABOUT THE MARIJUANA ESTABLISHMENT

Business Legal Name: Lazy River Products - Tewksbury, LLC

Phone Number: 978-549-2266 Email Address: wcassotis@lazyriverproducts.com

Business Address 1: 553 Main Street Unit 2

Business Address 2:

Business City: Tewksbury

Business State: MA

Business Zip Code: 01876

Mailing Address 1: 155 Broadway Road

Mailing Address 2: Suite 5

Mailing City: Dracut

Mailing State: MA

Mailing Zip Code: 01826

CERTIFIED DISADVANTAGED BUSINESS ENTERPRISES (DBES)

Certified Disadvantaged Business Enterprises (DBEs): Not a DBE

PRIORITY APPLICANT

Priority Applicant: no

Priority Applicant Type: Not a Priority Applicant

Economic Empowerment Applicant Certification Number:

RMD Priority Certification Number:

RMD INFORMATION

Name of RMD:

Department of Public Health RMD Registration Number:

Operational and Registration Status:

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

If no, describe the circumstances below:

PERSONS WITH DIRECT OR INDIRECT AUTHORITY

Person with Direct or Indirect Authority 1

Percentage Of Ownership: 100

Percentage Of Control: 100

Role: Owner / Partner

Other Role: CEO/President

First Name: William

Last Name: Cassotis

Suffix:

Gender: Male

User Defined Gender:

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

Specify Race or Ethnicity:

ENTITIES WITH DIRECT OR INDIRECT AUTHORITY

Entity with Direct or Indirect Authority 1

Percentage of Control:

Percentage of Ownership:

Entity Legal Name: Real Estate Dynamics, LLC

Entity DBA: Real Estate Dynamics

DBA City: Dracut

Entity Description: Real Estate Management Company - Property Owner

Foreign Subsidiary Narrative:

Entity Phone: 978-549-2266

Entity Email: wcassotis@realestatedynamicsma.com

Entity Website: NA

Entity Address 1: 155 Broadway Rd Suite 5

Entity Address 2:

Entity City: Dracut

Entity State: MA

Entity Zip Code: 01826

Entity Mailing Address 1: 155 Broadway Rd Suite 5

Entity Mailing Address 2:

Entity Mailing City: Dracut

Entity Mailing State: MA

Entity Mailing Zip Code: 01826

Relationship Description: Real Estate Dynamics, LLC owns the parcel of land and the 3 buildings, to include Lazy River Products Manufacturing and Retail building at 149 Broadway Rd. Dracut, MA 01826. Real Estate Dynamics, LLC is owned by 1 person, who controls 100% of the Equity and 100% of the voting rights. It happens to be the same owner with the same level of control for the Lazy River Products organization.

Lazy River Products - Tewksbury, LLC is owned by the same person with the same level of control and interest.

Capital was raised for this project through conventional banking means, Bank 5. Bank 5 needed to use the "property" and the assets to collateralize the loan.

This loan was for \$4mil, of which \$2mil is being allocated specifically for Tewksbury's build. The Bank has composed a new letter that was just updated per your RFI item 2 regarding how the \$2mil is being spent.

Since Real Estate Dynamics, LLC ("Borrower") technically "Owns" the buildings and the property, the Bank needed to include them in the loan documentation.

Lazy River Products - Tewksbury, LLC is the "Operating Company", not Lazy River Products, LLC as referenced in the RFI. The lease has since been updated to reflect "Lazy River Products - Tewksbury" as the "Tenant".

Entity with Direct or Indirect Authority 2

Percentage of Control: 100

Percentage of Ownership: 100

Entity Legal Name: Lazy River Products, LLC

Entity DBA: Lazy River Products

DBA City: Dracut

Entity Description: Parent Company to Lazy River Products - Tewksbury, LLC

Foreign Subsidiary Narrative:

Entity Phone: 978-243-9333

Entity Email: wcassotis@lazyriverproducts.com

Entity Website: www.lazyriverproducts.com

Entity Address 1: 145 Broadway Rd Unit 2

Entity Address 2:

Entity City: Dracut

Entity State: MA

Entity Zip Code: 01826

Entity Mailing Address 1: 155 Broadway Rd Suite 5

Entity Mailing Address 2:

Entity Mailing City: Dracut

Entity Mailing State: MA

Entity Mailing Zip Code: 01826

Relationship Description: Lazy River Products, LLC is the company's first facility in Dracut, MA and the Parent Company to Lazy River Products - Tewksbury, LLC. This is where manufacturing, cultivation and retail are located. This will also be the location

of future cultivation for LRP as we scale and already have plans to convert one of the other 3 buildings to additional cultivation following the Tewksbury build.

Entity with Direct or Indirect Authority 3

Percentage of Control:

Percentage of Ownership:

Entity Legal Name: Fall River Five Cents Savings Bank

Entity DBA: Bank 5

DBA City:
Fairhaven

Entity Description: Regional Bank

Foreign Subsidiary Narrative:

Entity Phone: 774-888-6252

Entity Email:
Lynn.Motta@bankfive.com

Entity Website:

Entity Address 1: 105 Huttleston Ave.

Entity Address 2:

Entity City: Fairhaven

Entity State: MA

Entity Zip Code: 02719

Entity Mailing Address 1: 105 Huttleston Ave.

Entity Mailing Address 2:

Entity Mailing City: Fairhaven

Entity Mailing State: MA

Entity Mailing Zip Code:
02719

Relationship Description: The Bank is Financing the buildout of the Lazy River Products - Tewksbury, LLC location.

CLOSE ASSOCIATES AND MEMBERS

Close Associates or Member 1

First Name: Mark

Last Name: Leal

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Mark is the Chief Operating Officer at Lazy River Products. Mark plays a vital role overseeing and managing Retail Operations, Inventory and Packaging. Mark will be working in conjunction with other valued members of the Lazy River Products Management Team to further develop best practices across all respective arms of the business.

Close Associates or Member 2

First Name: Kevin

Last Name: Platt

Suffix:

Describe the nature of the relationship this person has with the Marijuana Establishment: Kevin is the Chief Cultivation Officer at Lazy River Products. Kevin plays a vital role overseeing and managing cultivation Operations, and will be working in conjunction with other valued members of the Lazy River Products Management Team to further develop best practices across all respective arms of the business.

CAPITAL RESOURCES - INDIVIDUALS

No records found

CAPITAL RESOURCES - ENTITIES

Entity Contributing Capital 1

Entity Legal Name: Fall River Five Cents Savings Bank

Entity DBA: Bank 5

Email:

Phone: 774-888-6252

Lynn.Motta@bankfive.com

Address 1: 105 Huttleston Ave.

Address 2:

City: Fairhaven

State: MA

Zip Code: 02719

Types of Capital: Debt

Other Type of Capital:

Total Value of Capital Provided:
\$2000000

Percentage of Initial Capital:
100

Capital Attestation: Yes

Entity Contributing Capital 2

Entity Legal Name: Real Estate Dynamics, LLC

Entity DBA: Real Estate Dynamics

Email: wcassotis@realestatedynamicsma.com		Phone: 978-549-2266	
Address 1: 155 Broadway Rd Suite 5		Address 2:	
City: Dracut	State: MA	Zip Code: 01826	
Types of Capital: Other	Other Type of Capital: Mortgagee	Total Value of Capital Provided: \$2000000	Percentage of Initial Capital:
Capital Attestation: Yes			

Entity Contributing Capital 3

Entity Legal Name: Lazy River Products, LLC		Entity DBA: Lazy River Products	
Email: wcassotis@lazyriverproducts.com		Phone: 978-943-9333	
Address 1: 145 Broadway Rd Unit 2		Address 2:	
City: Dracut	State: MA	Zip Code: 01826	
Types of Capital: Other	Other Type of Capital: Guarantor of Debt	Total Value of Capital Provided: \$2000000	Percentage of Initial Capital:
Capital Attestation: Yes			

BUSINESS INTERESTS IN OTHER STATES OR COUNTRIES

No records found

DISCLOSURE OF INDIVIDUAL INTERESTS

Individual 1

First Name: William	Last Name: Cassotis	Suffix:
Marijuana Establishment Name: Lazy River Products, LLC	Business Type: Marijuana Retailer	
Marijuana Establishment City: Dracut	Marijuana Establishment State: MA	

Individual 2

First Name: Mark	Last Name: Leal	Suffix:
Marijuana Establishment Name: Lazy River Products, LLC	Business Type: Marijuana Retailer	
Marijuana Establishment City: Dracut	Marijuana Establishment State: MA	

Individual 3

First Name: Kevin	Last Name: Platt	Suffix:
Marijuana Establishment Name: Lazy River Products, LLC	Business Type: Marijuana Retailer	
Marijuana Establishment City: Dracut	Marijuana Establishment State: MA	

Individual 4

First Name: William	Last Name: Cassotis	Suffix:
Marijuana Establishment Name: Lazy River Products, LLC	Business Type: Marijuana Cultivator	
Marijuana Establishment City: Dracut	Marijuana Establishment State: MA	

Individual 5

First Name: William	Last Name: Cassotis	Suffix:
Marijuana Establishment Name: Lazy River Products, LLC	Business Type: Marijuana Product Manufacture	
Marijuana Establishment City: Dracut	Marijuana Establishment State: MA	

Individual 6

First Name: Mark	Last Name: Leal	Suffix:
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Marijuana Establishment Name: Lazy River Products, LLC

Business Type: Marijuana Cultivator

Marijuana Establishment City: Dracut

Marijuana Establishment State: MA

Individual 7

First Name: Mark

Last Name: Leal

Suffix:

Marijuana Establishment Name: Lazy River Products, LLC

Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Dracut

Marijuana Establishment State: MA

Individual 8

First Name: Kevin

Last Name: Platt

Suffix:

Marijuana Establishment Name: Lazy River Products, LLC

Business Type: Marijuana Cultivator

Marijuana Establishment City: Dracut

Marijuana Establishment State: MA

Individual 9

First Name: Kevin

Last Name: Platt

Suffix:

Marijuana Establishment Name: Lazy River Products, LLC

Business Type: Marijuana Product Manufacture

Marijuana Establishment City: Dracut

Marijuana Establishment State: MA

MARIJUANA ESTABLISHMENT PROPERTY DETAILS

Establishment Address 1: 553 Main Street, Unit 2

Establishment Address 2:

Establishment City: Tewksbury

Establishment Zip Code: 01876

Approximate square footage of the establishment: 8700

How many abutters does this property have?: 57

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
Plan to Remain Compliant with Local Zoning	5. Plan To Remain Compliant With Local Zoning Ordinances (002).pdf	pdf	65b7de457252ab000881e54e	01/29/2024
Community Outreach Meeting Documentation	Attachment A__LowellSun Ad_4-19-2024.pdf	pdf	662faaa6791042000873b299	04/29/2024
Community Outreach Meeting Documentation	Attachment B__TownStamped_Filed_CommOutreachAd_4.19.2024.pdf	pdf	662fab87791042000873b464	04/29/2024
Community Outreach Meeting Documentation	Attachment C (Mailers) 2024 -1.pdf	pdf	662fb2abf707fa0008f3afb8	04/29/2024
Community Outreach Meeting Documentation	Attachment C (Mailers) 2024 -2.pdf	pdf	662fb2c8791042000873cab0	04/29/2024
Community Outreach Meeting Documentation	Attachment C__Lazy River Abutters Notice Letter_V2_4.22.2024.pdf	pdf	662fdeb37910420008744cce	04/29/2024

Community Outreach Meeting Documentation	Tewks-COM Attestation_5-8-2024.pdf	pdf	663b7911f707fa0008ff8639	05/08/2024
Community Outreach Meeting Documentation	Attachment C_Abutters Listing (Redacted).pdf	pdf	663b96def707fa0008ffd2a3	05/08/2024
Executed HCA	08-28-2024 HCA-LAZY RIVER PRODUCTS-TEWKSBURY - FINAL.pdf	pdf	66d0c6741a9ec90008a6aa77	08/29/2024

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.: \$

POSITIVE IMPACT PLAN

Positive Impact Plan:

Document Category	Document Name	Type	ID	Upload Date
Other	LRP Individualized Career Development Program_R1.pdf	pdf	6570cc4a4a8d510008a1496c	12/06/2023
Other	MVFB_TEWKS_4-18-2024.pdf	pdf	662666fc79104200086c17e0	04/22/2024
Other	TW_Tewks-Letter_10-7-2024.pdf	pdf	67041f4c7eba6a00080afb97	10/07/2024
Plan for Positive Impact	LRP Positive Impact Plan R3.2.pdf	pdf	67041f5e5fdc620008cdf54	10/07/2024
Other	PK_Tewks_Letter_10-7-2024.pdf	pdf	670428bd5fdc620008ce107d	10/07/2024

ADDITIONAL INFORMATION NOTIFICATION

Notification:

INDIVIDUAL BACKGROUND INFORMATION

Individual Background Information 1

Role: Executive / Officer

Other Role: CEO

First Name: William

Last Name: Cassotis Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 2

Role: Executive / Officer

Other Role: COO

First Name: Mark

Last Name: Leal Suffix:

RMD Association: Not associated with an RMD

Background Question: no

Individual Background Information 3

Role: Executive / Officer

Other Role: CCO

First Name: Kevin

Last Name: Platt Suffix:

RMD Association: Not associated with an RMD

Background Question: no

ENTITY BACKGROUND CHECK INFORMATION
Entity Background Check Information 1

Role: Other (specify)

Other Role: The Bank Financing the buildout.

Entity Legal Name: Fall River Five Cents Savings Bank

Entity DBA: Bank 5

Entity Description: Regional Bank

Phone: 774-888-6252

Email: Lynn.Motta@bankfive.com

Primary Business Address 1: 105 Huttleston Ave.

Primary Business Address 2:

Primary Business City: Fairhaven

Primary Business State: MA

Principal Business Zip Code: 02719

Additional Information: NMLS # 525575

Routing 211370642

Entity Background Check Information 2

Role: Other (specify)

Other Role: Mortgagee for the \$2,000,000 buildout of Lazy River Products - Tewksbury LLC

Entity Legal Name: Real Estate Dynamics, LLC

Entity DBA: Real Estate Dynamics

Entity Description: Real Estate Management Company - Property Owner

Phone: 978-549-2266

Email: wcassotis@realestatedynamicsma.com

Primary Business Address 1: 155 Broadway Rd Suite 5

Primary Business Address 2:

Primary Business City: Dracut

Primary Business State: MA

Principal Business Zip Code: 01826

Additional Information: Real Estate Dynamics LLC is a Single Member LLC, owned 100% by William J. Cassotis.

Entity Background Check Information 3

Role: Parent Company

Other Role:

Entity Legal Name: Lazy River Products, LLC

Entity DBA: Lazy River Products

Entity Description: Parent Company to Lazy River Products - Tewksbury, LLC

Phone: 978-943-9333

Email: wcassotis@lazyriverproducts.com

Primary Business Address 1: 145 Broadway Rd Unit 2

Primary Business Address 2:

Primary Business City: Dracut

Primary Business State: MA

Principal Business Zip Code: 01826

Additional Information: Lazy River Products, LLC is a Single Member LLC, owned 100% by William J. Cassotis.

MASSACHUSETTS BUSINESS REGISTRATION
Required Business Documentation:

Document Category	Document Name	Type	ID	Upload Date
Articles of Organization	LAZY RIVER PRODUCTS - TEWKSBURY LLC - DE - Department of State_ Division Of Corporations - Formation Filing - LLC.pdf	pdf	64765d5e5ab6120008cbc038	05/30/2023
Bylaws	Tewksbury ByLaws 11.11.22.pdf	pdf	64765d675ab6120008cbc04f	05/30/2023
Articles of Organization	Lazy River Products LLC - Tewksbury - Foreign Registration & Delaware Articles.pdf	pdf	65a8433e7252ab000876b71f	01/17/2024
Secretary of Commonwealth - Certificate of Good Standing	TEWKS--Sec of State_Cert of GS_1-19-2024.pdf	pdf	65b7c9f658452f0008a27e05	01/29/2024
Department of Revenue - Certificate of Good standing	LRP-Tewksbury - MA DOR Certificate of Good Standing 01.18.24.pdf	pdf	65b7ca3c58452f0008a27e62	01/29/2024

Department of Unemployment Assistance - Certificate of Good standing	MR-TEWKS__DUA Placeholder_1-26-2024.pdf	pdf	65b7cad37252ab000881b11d	01/29/2024
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No documents uploaded

Massachusetts Business Identification Number: 001622343

Doing-Business-As Name: Lazy River Products - Tewksbury, LLC

DBA Registration City: Tewksbury

BUSINESS PLAN

Business Plan Documentation:

Document Category	Document Name	Type	ID	Upload Date
Business Plan	6. Business Plan - Tewksbury_NoPhotos_9.29.2023.pdf	pdf	6516c7fc5df17300086b69a9	09/29/2023
Proposed Timeline	TimelineScreenshot_9.29.2023.jpg	jpeg	6516cfbd5df17300086b7322	09/29/2023
Plan for Liability Insurance	Gilbert_2024-TEWKS(RFI).pdf	pdf	65bd2dd77252ab000887024a	02/02/2024

OPERATING POLICIES AND PROCEDURES

Policies and Procedures Documentation:

Document Category	Document Name	Type	ID	Upload Date
Plan for obtaining marijuana or marijuana products	n. LRP Plan For Obtaining Marijuana or Marijuana Products - Retail (R)-FINAL-R2_6.pdf	pdf	6516d0b5ca49d200072e361d	09/29/2023
Restricting Access to age 21 and older	e. LRP Restricting Access to 21 and Older - Retail (R)-FINAL-R2_2.pdf	pdf	6516d1175df17300086b73b7	09/29/2023
Security plan	a. LRP Security Plan - Retail (R) - FINAL-R2_9_.pdf	pdf	6516ecd65df17300086baeaf	09/29/2023
Prevention of diversion	f. LRP Prevention of Diversion - Retail (R)-FINAL-R2_3.pdf	pdf	6516ed7cca49d200072e7293	09/29/2023
Storage of marijuana	c. LRP Storage of Marijuana - (R)(MP)(MC)-FINAL-R2_4.pdf	pdf	6516ee7c5df17300086bb5e7	09/29/2023
Inventory procedures	b. LRP Inventory Procedures - Retail (R)-FINAL-R2_7.pdf	pdf	6516f0b95df17300086bbc0a	09/29/2023
Record Keeping procedures	i. LRP Record Keeping Procedures - Retail (R)-FINAL-R2_2.pdf	pdf	65173975ca49d200072f0c96	09/29/2023
Maintaining of financial records	j. LRP Maintaining of Financial Records - Retail (R)-FINAL-R2_3.pdf	pdf	65173989ca49d200072f0ce8	09/29/2023
Qualifications and training	k. LRP Qualifications and Training - FINAL-R2_2.pdf	pdf	651739b0ca49d200072f0d52	09/29/2023
Energy Compliance Plan	Energy Compliance Plan_Tewksbury_R1.pdf	pdf	6558f08dbc2d09000870a5df	11/18/2023
Diversity plan	LRP Diversity Plan_R2_7 (1-3).pdf	pdf	65bd02227252ab000886ab8a	02/02/2024
Transportation of marijuana	2. Lazy River Transportation and Transfer	pdf	65bd038458452f0008a780a0	02/02/2024

Procedures_R1_2.pdf				
Dispensing procedures	10. LRP Dispensing Procedures - R2_1.pdf	pdf	65bd03917252ab000886ad9b	02/02/2024
Quality control and testing	9. LRP Quality Control and Testing_R1_3.pdf	pdf	65bd03a758452f0008a780ff	02/02/2024
Personnel policies including background checks	11. LRP Personnel Policies including background checks - Retail (R)-FINAL-R2.2.pdf	pdf	65bd226b58452f0008a7be38	02/02/2024

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 - PRE FEBRUARY 27, 2024

No records found

COMPLIANCE WITH DIVERSITY PLAN

No records found

HOURS OF OPERATION

Monday From: 10:00 AM	Monday To: 8:00 PM
Tuesday From: 10:00 AM	Tuesday To: 8:00 PM
Wednesday From: 10:00 AM	Wednesday To: 8:00 PM
Thursday From: 10:00 AM	Thursday To: 8:00 PM
Friday From: 10:00 AM	Friday To: 8:00 PM
Saturday From: 10:00 AM	Saturday To: 8:00 PM
Sunday From: 12:00 PM	Sunday To: 6:00 PM

Lazy River Products – Tewksbury, LLC

A subsidiary of Lazy River Products, LLC

DBA Lazy River Products

Lazy River Products will below articulate its plan to remain compliant with local zoning and will address our steps to ensure ongoing compliance and includes the local licensing requirements of adult – use marijuana and that our location is appropriated by a local Marijuana Business License and Special Permit, awarded by the Towns Select Board.

Town of Tewksbury - Zoning Draft 2022 Rev. 2b Updated 5/6/22

Lazy River's Tewksbury, MA location located at 553 Main St Unit 2 is a fully enclosed building. Lazy River will NOT be using any outside storage units or facilities. Everything will be appropriately stored and vaulted inside the proposed facility.

This location will be appropriately ventilated.

The storefront will have appropriate signage restricting customers to those who are 21 years of age or older.

The space we are commissioning for this use was a vacant space that is now under lease with Lazy River Products.

The Dispensary location is NOT within 500' of any public or private K-12 Schools.

The dispensary is NOT located in the same building as any residential units.

This location does not have a drive-through and will be fully compliant with the Town of Tewksbury's zoning requirements as well as the requirements of the CCC.

Lazy River will operate during the following business hours according to the Towns By-Laws on the matter:

Mon – Sat 10am-8pm

Sun 12pm-6pm

We plan to consistently remain compliant and have made this a part of our local licensing renewals. Without remaining compliant we will not be able to continue to do business in town.

Lazy River Products – Tewksbury, LLC was issued an executed HCA with the Town of Tewksbury on 10/24/2023. The Select Board has issued a Marijuana Retail Sales License to Lazy River Products – Tewksbury, LLC.

THE SUN
lowellsun.com
MASSACHUSETTS

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AUTOMOTIVE

EMPLOYMENT

HANPYMAN

PETS

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2110 MUSICAL INSTRUMENTS

Top \$\$ Paid

We Buy ALL Musical Instruments - Guitars, Saxes, etc. We travel & Pick-Up. Cash on the spot!

617-594-3255

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MILITARY ITEMS

Swords, knives, medals, bayonets, helmets, flags, uniforms, guns. 603-886-7246

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EMPLOYMENT

4002 GENERAL

JOURNEYMAN & APPRENTICES PLUMBERS

For Commercial & Residential Work Health, Dental, 401k, Paid Vacation, Sick & Holidays. Please Call Bill 978-758-8656

WORK IN IRELAND

Small B&B and Restaurant located in Scenic Kerry Town is seeking enthusiastic staff for all areas of operation. Accommodation provided. Opening Spring 2024. Commitment to October 2024 and beyond. Please send CV to the email below :- Contact :- David Sheehan Phone 00 353-87-920-1872 Email:- bestsds10@gmail.com, for all replies.

REAL ESTATE

6010 REAL ESTATE FOR SALE

DRACUT INDUSTRIAL BAY FOR LEASE ONE GARAGE DOOR 30'x 46' OFFICE LOFT \$2,000/month No Auto repair or Autobody rentals@dracohomes.com 978-453-1549

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Affordable Apts. & Studios, \$650 & up. All utils incl. Sec. 8 Welcome. To Apply visit: www.bpbrealty.com 978-458-2552

APT LOWELL. 2 & 3 BDRM

Quality, affordable, section 8 welcome. Start at \$1500. Call 978-937-3033 www.tmrentals.com

BEAVER BROOK VILLAGE DRACUT 1, 2, 3 BDRM.

Start at \$1825. Call TMI: 978-455-4147 www.tmrentals.com

TRANSPORTATION

7005 AUTOS

Junk Cars Wanted Same day removal 978-970-4900

7070 CARS WANTED

Paying \$200 and up for junk cars and trucks LOWELL USED AUTO PARTS (978)454-4444

PICKED UP WITHIN 24 HRS 603-303-2866 Junk Cars & Trucks WANTED. Pay Up to \$800

6310 VACATION RENTALS

SALISBURY BEACH

Oceanfront & Oceanside 2, 3 & 4 bedroom Cottages and condos Prime weeks still available Tom Saab Real Estate (978) 683-6699

Hampton Beach

3 room, 1 BR condos w/ kitchenettes, living room, full bath, private balcony, A/C, exercise rm, laundry facilities and more. Nightly/weekly The Sands Resort (603) 929-0685 www.sandsresort.com

PUBLIC NOTICE

Community Outreach Meeting

Lazy River Products - Tewksbury, LLC will hold a Community Outreach Meeting on Tuesday, May 7th at 6:00pm to discuss the proposed siting of an Adult and Medical Use Marijuana Retail Establishment to be located at 553 Main Street, Unit 2 Tewksbury, MA 01876 in accordance with M.G.L. ch. 94G and the Massachusetts Cannabis Control Commission's regulations at 935 CMR 500.000 et seq. The meeting will be held at the Hilton Garden Inn, Tewksbury Andover, located at 4 Highwood Drive, Tewksbury, MA 01876. Interested members of the community are encouraged to ask questions and receive answers from Company representatives about the proposed facility and operations. April 19 #NY0112266

PUBLIC NOTICE

Dracut Conservation Commission Legal Notice of Public Hearing

Wetlands Protection Act

A public hearing will be held for a Request for Determination of Applicability, filed by Mary Foley, to move concrete pad, lamp post, stairs, landing and sheds within the Bank and associated 100 ft Buffer Zone, Land Under Waterbodies and Waterways, and Bordering Land Subject to Flooding at 829 Nashua Rd, Dracut, MA 01826. Meeting will be held in connection with Chapter 131, Section 40 of the M.G.L. and the Dracut Wetland Bylaw on Wednesday, May 1st, 2024, at 7:00pm at Harmony Hall, April 19th, 2024 #NY0112128

1205 PROBATE CITATIONS

Commonwealth of Massachusetts The Trial Court Probate and Family Court Docket No. M124P1663EA Middlesex

Probate and Family Court 10-U Commerce Way, Woburn, MA 01801 (781)865-4000 CITATION ON PETITION FOR FORMAL ADJUDICATION Estate of: Irene C. Rainville Also known as: Irene Rainville Date of Death: 11/19/2023 To all interested persons: A Petition for Formal Adjudication has been filed by Pauline Montmarquet of Lowell, MA requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition. The Petitioner requests that Pauline Montmarquet of Lowell, MA be appointed as Personal Representative(s) of said estate to serve Without Surety on the bond in Unsupervised Administration IMPORTANT NOTICE You have the right to obtain a copy of the Petition from the Petitioner or at the Court. You have a right to object to this proceeding. To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m. on the return day of 5/1/2024. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you 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, action may be taken without further notice to you.UNSUPERVISED ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE CODE (MUPC) A Personal Representative appointed under the MUPC in an unsupervised 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. Witness, Hon. Terri L. Klug Cafazzo, First Justice of this Court, Date: 4/9/24. Tara E. DeCristofaro, Register of Probate 4/19/24 #NY0111223

1205 PROBATE CITATIONS

Commonwealth of Massachusetts The Trial Court Probate and Family Court Docket No. M124P1708EA Middlesex

Probate and Family Court 10-U Commerce Way, Woburn, MA 01801 (781)865-4000 CITATION ON PETITION FOR FORMAL ADJUDICATION Estate of: Suzanne R. Morse Also known as: Suzanne Rice Morse Date of Death: 01/11/2024 To all interested persons: A Petition for S/A - Formal Probate of Will with Appointment of Personal Representative has been filed by Thomas R. Morse, III of Marblehead, MA requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition. The Petitioner requests that Thomas R. Morse, III of Marblehead, MA be appointed as Personal Representative(s) of said estate to serve Without Surety on the bond in Unsupervised Administration IMPORTANT NOTICE You have the right to obtain a copy of the Petition from the Petitioner or at the Court. You have a right to object to this proceeding. To do so, you or your attorney must file a written appearance and objection at this Court before: 10:00 a.m. on the return day of 05/10/2024. This is NOT a hearing date, but a deadline by which you must file a written appearance and objection if you 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, action may be taken without further notice to you.UNSUPERVISED ADMINISTRATION UNDER THE MASSACHUSETTS UNIFORM PROBATE CODE (MUPC) A Personal Representative appointed under the MUPC in an unsupervised 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. Witness, Hon. Terri L. Klug Cafazzo, First Justice of this Court, Date: April 12, 2024. Tara E. DeCristofaro, Register of Probate 4/19/2024 #NY0111961

1220 MORTGAGE FORECLOSURE

(SEAL) COMMONWEALTH OF MASSACHUSETTS LAND COURT DEPARTMENT OF THE TRIAL COURT 24 SM 001488 ORDER OF NOTICE TO:

Bunna Lun

and to all persons entitled to the benefit of the Servicemembers Civil Relief Act: 50 U.S.C. c. 50 § 3901 (et seq):

claiming to have an interest in a Mortgage covering real property in Lowell, numbered 1082 Bridge Street, given by Bunna Lun to Mortgage Electronic Registration Systems, Inc., as Mortgagee, as nominee for Guaranteed Rate, Inc., dated June 13, 2022, and recorded at Middlesex County (Northern District) Registry of Deeds in Book 37158, Page 207, and now held by the plaintiff by assignment, has/have 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 a foreclosure 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 May 27, 2024 or you may lose the opportunity to challenge the foreclosure on the grounds of noncompliance with the Act. Witness, GORDON H. PIPER, Chief Justice of said Court on April 12, 2024. Attest: Deborah J. Patterson Recorder 04/19/2024 #NY0111942

PUBLIC NOTICE

TOWN OF CARLISLE ZONING BOARD OF APPEALS LEGAL NOTICE NOTICE OF PUBLIC HEARING

The Carlisle Zoning Board of Appeals will hold a public hearing in the Town Hall, 66 Westford St. Carlisle, MA at 7:00 pm on Monday, May 6, 2024 on the following application: Richard Chick requesting a Variance pursuant to Section 7.5 to build a garage less than 10 feet from the property line where 40 feet is required. The property is located at 35 Suffolk Lane. Manuel Crespo Clerk, Board of Appeals April 12 19 #NY0111266

PUBLIC NOTICE

TOWN OF CARLISLE ZONING BOARD OF APPEALS LEGAL NOTICE NOTICE OF PUBLIC HEARING

The Carlisle Zoning Board of Appeals will hold a public hearing in the Town Hall, 66 Westford St. Carlisle, MA at 7:00 pm on Monday, May 6, 2024 on the following application: Eric Daum Special Permit pursuant to Section 6.3 to build a conforming addition to an existing non-conforming structure. The property is located at 566 Acton Street. Manuel Crespo Clerk, Board of Appeals April 12 19 #NY0111267

PUBLIC NOTICE

TOWN OF CARLISLE ZONING BOARD OF APPEALS LEGAL NOTICE NOTICE OF PUBLIC HEARING

The Carlisle Zoning Board of Appeals will hold a public hearing in the Town Hall, 66 Westford St. Carlisle MA a 7:00 pm on Monday, May 6, 2024 on the following application: Scott Jenney requesting a Special Permit pursuant to Section 3.2.2.9 for the continued operation of a landscaping business. The property is located at 303 Brook Street. Manuel Crespo Clerk, Board of Appeals April 12 19 #NY0111268

LEGAL DEADLINES

4:00 PM TUESDAY - THURSDAY for next day publication

4:00 PM FRIDAY for Saturday, Sunday, Monday publication

TO PLACE A LEGAL NOTICE: <https://adportal.bostonherald.com/> nygroup-adportal/ma-legals/index.html

or EMAIL: legal@mediaonene.com

OFFICE HOURS: M-F 9AM-5PM | 978-458-3311

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THE SUN

Established 1878

FOR HOME DELIVERY CALL: 978-459-1300

PUBLIC MEETING NOTICE

Disadvantaged Business Enterprise (DBE) Goals



Lowell Regional Transit Authority (LRTA) Disadvantaged Business Enterprise (DBE) Goals For Federal Transit Administration (FTA) Assisted Activities Federal Fiscal Years 2025 - 2027

In compliance with Departments of Transportation's 49 CFR part 23 and 26, the Lowell Regional Transit Authority will be holding a meeting of contractors and interested parties to discuss the three-year Disadvantaged Business Enterprise (DBE) goal setting process, for Federal Fiscal Years (FFY) 2025, 2026, and 2027 (Oct. 1, 2024 – Sept. 30, 2027).

The meeting will be held virtually on Wednesday, April 24, 2024, at 10:00 a.m. For login details please contact the LRTA at (978) 459-0164 (customerservice@lra.com).

For further information, please contact Meghan O'Brien at (mobrien@lra.com) or Justin Howard at (justin.howard@lra.com).

MEETING ACCESSIBILITY

Please note that Lowell Regional Transit Authority (LRTA) is accessible to persons with disabilities. The LRTA provides reasonable accommodations and/or language assistance free of charge upon request (including but not limited to interpreters in American Sign Language and languages other than English, open or closed captioning for videos, assistive listening devices, and alternate material formats), as available. For assistance, please contact Meghan O'Brien at (mobrien@lra.com). Requests should be made as soon as possible for services requiring advanced arrangements, including sign-language, CART or language translation or interpretation.

TITLE VI NOTICE OF PROTECTION

The LRTA fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. The LRTA does not discriminate on the basis of race, color, national origin, English proficiency, income, religious creed, ancestry, disability, age, gender, sexual orientation, military service, or gender identity or expression. Any person who believes that he/she or any specific class of persons has been subjected to discrimination prohibited by Title VI or related statutes or regulations may, himself/herself or via a representative, file a complaint with the LRTA. For more information regarding filing a complaint, please contact LRTA Administration at (978) 459-0164, or at admin@lra.com or go to the LRTA website at <http://www.lra.com/>. If this information is needed in another language, please contact the LRTA Title VI Specialist at 978-459-0164. Caso esta informação seja necessária em outro idioma, favor contatar o Especialista em Título VI do LRTA pelo telefone 978-459-0164. Si necesita esta información en otro idioma, por favor contacte al especialista de LRTA del Título VI al 978-459-0164. Si yon moun vle genyen enfòmasyon sa yo nan yon lòt lang, tanpri kontakte Espesyalis LRTA Titil VI la nan nimewo 978-459-0164. 如果需要使用其它语言了解信息，请联系马萨塞州交通部（LRTA）《民权法案》第六章专员，电话 978-459-0164。

Lowell Sun – Legal Ad

(Community Outreach Notification)

TOWN CLERK
BOARD OF REGISTRARS
TEWKSBURY, MA
2024 APR 18 PM 1:19

April 19, 2024

Re: Community Outreach Meeting

To Whom It May Concern,

This letter is to give notice that Lazy River Products - Tewksbury, LLC will hold a Community Outreach Meeting on Tuesday, May 7th at 6:00pm to discuss the proposed siting of an Adult and Medical Use Marijuana Retail Establishment to be located at 553 Main Street, Unit 2 Tewksbury, MA 01876 in accordance with M.G.L. ch. 94G and the Massachusetts Cannabis Control Commission's regulations at 935 CMR 500.000 *et seq.* The meeting will be held at the Hilton Garden Inn, Tewksbury-Andover, located at 4 Highwood Drive, Tewksbury, MA 01876.

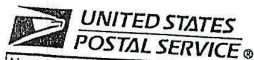
Interested members of the community are encouraged to ask questions and receive answers from Company representatives about the proposed facility and operations.

Sincerely,

Lazy River Products - Tewksbury, LLC



0000



Name and Address of Sender

Lazy River Products-
Tewksbury, LLC
553 Main St.
Unit 2
Tewksbury, MA
01876

TOTAL NO.
of Pieces Listed by Sender

34

TOTAL NO.
of Pieces Received at Post Office™

6

Affix Stamp Here
Postmark with Date of Receipt.

APR 24 2024

Postmaster, per (name of receiving employee)

U.S. POSTAGE PAID

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01826

APR 24 24

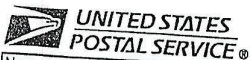
AMOUNT

\$19.72

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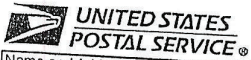
- Firm

USPS® Tracking Number Firm-specific Identifier	Address (Name, Street, City, State, and ZIP Code™)	Postage	Fee	Special Handling	Parcel Airlift
1. 1001	Board of Selectmen / Select Board Tewksbury Town Hall 1009 Main St. Tewksbury, MA 01876 Town Clerk				
2. 1002	Tewksbury Town Hall 1009 Main St. Tewksbury, MA 01876 Planning Board				
3. 1003	Tewksbury Town Hall 1009 Main St. Tewksbury, MA 01876 Town Manager				
4. 1004	Tewksbury Town Hall 1009 Main St. Tewksbury, MA 01876 [Redacted]				
5. 1005	[Redacted] Tewksbury, MA 01876 [Redacted]				
6. 1006	[Redacted] Tewksbury, MA 01876 [Redacted]				



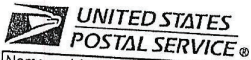
Certificate of Mailing — Firm

Name and Address of Sender		TOTAL NO. of Pieces Listed by Sender	TOTAL NO. of Pieces Received at Post Office™	Affix Stamp Here Postmark with Date of Receipt.			
		6	6				
		Postmaster, per (name of receiving employee)					
USPS® Tracking Number Firm-specific Identifier		Address (Name, Street, City, State, and ZIP Code™)		Postage	Fee	Special Handling	Parcel Airlift
1.	1007	55 Seneca Rd Tewksbury, MA 01876					
2.	1008	45 Seneca Rd Tewksbury, MA 01876					
3.	1009	45 Navillus Rd Tewksbury, MA 01876					
4.	1010	40 Navillus Rd Tewksbury, MA 01876					
5.	1011	55 Mammoth LLC PO Box 800729 Dallas, TX 75380					
6.	1012	4 Appletree Rd Tewksbury, MA 01876					



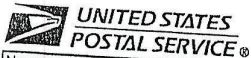
Certificate of Mailing — Firm

Name and Address of Sender		TOTAL NO. of Pieces Listed by Sender	TOTAL NO. of Pieces Received at Post Office™	Affix Stamp Here Postmark with Date of Receipt.			
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		Postmaster, per (name of receiving employee)					
USPS® Tracking Number Firm-specific Identifier		Address (Name, Street, City, State, and ZIP Code™)		Postage	Fee	Special Handling	Parcel Airlift
1.	1013	6 Apple Tree Rd. Tewksbury, MA 01876					
2.	1014	32 Rogers St. Tewksbury, MA 01876					
3.	1015	521 Main St. Tewksbury, MA 01876					
4.	1016	30 Kennedy Rd. Tewksbury, MA 01876					
5.	1017	12 Apple Tree Rd. Tewksbury, MA 01876					
6.	1018	725 Salem Street II 20 Chestnut St. Lynnfield, MA 01940					




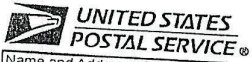
Certificate of Mailing — Firm

Name and Address of Sender		TOTAL NO. of Pieces Listed by Sender	TOTAL NO. of Pieces Received at Post Office™	Affix Stamp Here Postmark with Date of Receipt.			
		6	6				
		Postmaster, per (name of receiving employee)					
USPS® Tracking Number Firm-specific Identifier		Address (Name, Street, City, State, and ZIP Code™)		Postage	Fee	Special Handling	Parcel Airlift
1.	1019	Tewksbury Route 38 LLC 2 Regency Ridge Andover, MA 01810					
2.	1020	OST of Tewksbury LLC 375 Commerce Park Rd. N. Kingston, RI 02852					
3.	1021	OS Tewksbury LLC 375 Commerce Park Rd. N. Kingston, RI 02852					
4.	1022	Tewksbury Route 38 LLC 2 Regency Ridge Andover, MA 01810					
5.	1023	Tewksbury Equity Partners LLC c/o Everest Partners LLC 150 East 5th St. New York, NY 10003					
6.	1024	10 Appleton Rd Tewksbury, MA 01876					



Certificate of Mailing — Firm

Name and Address of Sender		TOTAL NO. of Pieces Listed by Sender	TOTAL NO. of Pieces Received at Post Office™	Affix Stamp Here Postmark with Date of Receipt.			
		6	6				
		Postmaster, per (name of receiving employee)					
							
USPS® Tracking Number Firm-specific Identifier		Address (Name, Street, City, State, and ZIP Code™)		Postage	Fee	Special Handling	Parcel Airlift
1.	1025	14 Apple Tree Rd. Tewksbury, MA 01876					
2.	1026	21 Third Ave Lowell, MA 01854					
3.	1027	25 Seneca Rd. Tewksbury, MA 01876					
4.	1028	Dion, William 25 Seneca Rd. Tewksbury, MA 01876					
5.	1029	32 Rogers St. Tewksbury, MA 01876					
6.	1030	17 Rogers St. Tewksbury, MA 01876					



Certificate of Mailing — Firm

Name and Address of Sender

TOTAL NO.
of Pieces Listed by Sender

4

TOTAL NO.
of Pieces Received at Post Office™

4

Affix Stamp Here
Postmark with Date of Receipt.

Postmaster, per (name of receiving employee)

USPS® Tracking Number
Firm-specific Identifier

Address
(Name, Street, City, State, and ZIP Code™)

Postage

Fee

Special Handling

Parcel Airlift

1. 1031

[Redacted]
7 Rogers St.
Tewksbury, MA 01876

2. 1032

[Redacted]
52 Newellus Rd.
Tewksbury, MA 01876

3. 1033

[Redacted]
540 Main St.
Tewksbury, MA 01876

4. 1034

[Redacted]
530 Main St. Realty Trust
530 Main St.
Tewksbury, MA 01876

5.

6.

ATTACHMENT C

NOTICE OF INTENT TO ABUTTERS FOR PROPOSED ADULT & MEDICAL USE RETAIL MARIJUANA DISPENSARY

Applicant: Lazy River Products – Tewksbury, LLC

Address: 553 Main St. Unit 2
Tewksbury, MA 01876

Date Notice Sent: April 26, 2024

Abutter &

Abutter Address: All Abutters Within 300 Feet of 553 Main Street, Unit 2 Tewksbury, MA 01876

Dear Abutter:

The purpose of this letter is to serve as a notice that a Community Outreach Meeting is being scheduled for the Lazy River Products proposed Adult & Medical Use Retail Marijuana Dispensary on Tuesday, May 7, 2024 from 6:00 p.m. to 8:00 p.m. at the Hilton Garden Inn Tewksbury-Andover, located at 4 Highwood Dr, Tewksbury, Massachusetts. The proposed Adult & Medical Use Marijuana Retail Dispensary is to be located at 553 Main Street, Unit 2, Tewksbury, Massachusetts.

There will be an opportunity for the public to ask questions. The meeting will cover, at a minimum, the following topics: the proposed location and type of the marijuana establishment; the building being moved into and compliance with security requirements as outlined by 935 CMR 500 *et seq.* (the Massachusetts Adult Use Marijuana Regulations); steps taken to prevent the diversion of marijuana to minors; plan to positively impact the local community; and information demonstrating how the location will not constitute a nuisance to the community.

The records of the Town of Tewksbury Assessor's office show that you own property with a boundary within three hundred feet from the property line of the establishment. This letter is to meet the notice requirement as set out by the Commonwealth of Massachusetts Cannabis Control Commission.

Sincerely,

Executive Management
Lazy River Products-Tewksbury, LLC
553 Main St. Unit 2
Tewksbury, MA 01876
Email Address: info@lazyriverproducts.com

Applicant: Lazy River Products – Tewksbury, LLC

Address: 553 Main St. Unit 2
Tewksbury, MA 01876

Date Notice Sent: April 26, 2024

Town Clerk
Tewksbury Town Hall
1009 Main Street
Tewksbury, MA 01876

RE: Notice of Intent to Abutters for Proposed Adult & Medical Use
Retail Marijuana Establishment
At 553 Main Street Unit 2, Tewksbury, MA 01876

Dear Sir/Madam:

Attached please find a copy of the Notice of Intent to Abutters for Proposed Adult & Medical Use Retail Facility at 553 Main Street Unit 2, Tewksbury, MA 01876. Said notice was provided to all abutters within 300 feet of the subject property.

Sincerely,

Executive Management
Lazy River Products - Tewksbury, LLC
553 Main St. Unit 2
Tewksbury, MA 01876
Email Address: info@lazyriverproducts.info

Applicant: Lazy River Products – Tewksbury, LLC

Address: 553 Main St. Unit 2
Tewksbury, MA 01876

Date Notice Sent: April 26, 2024

Planning Board
Tewksbury Town Hall
1009 Main Street
Tewksbury, MA 01876

RE: Notice of Intent to Abutters for Proposed Adult & Medical Use
Retail Marijuana Establishment
At 553 Main Street Unit 2, Tewksbury, MA 01876

Dear Sir/Madam:

Attached please find a copy of the Notice of Intent to Abutters for Proposed Adult & Medical Use Retail Facility at 553 Main Street Unit 2, Tewksbury, MA 01876. Said notice was provided to all abutters within 300 feet of the subject property.

Sincerely,

Executive Management
Lazy River Products - Tewksbury, LLC
553 Main St. Unit 2
Tewksbury, MA 01876
Email Address: info@lazyriverproducts.info

Applicant: Lazy River Products – Tewksbury, LLC

Address: 553 Main St. Unit 2
Tewksbury, MA 01876

Date Notice Sent: April 26, 2024

Town Manager
Tewksbury Town Hall
1009 Main Street
Tewksbury, MA 01876

RE: Notice of Intent to Abutters for Proposed Adult & Medical Use
Retail Marijuana Establishment
At 553 Main Street Unit 2, Tewksbury, MA 01876

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Sincerely,

Executive Management
Lazy River Products - Tewksbury, LLC
553 Main St. Unit 2
Tewksbury, MA 01876
Email Address: info@lazyriverproducts.info

Applicant: Lazy River Products – Tewksbury, LLC

Address: 553 Main St. Unit 2
Tewksbury, MA 01876

Date Notice Sent: April 26, 2024

Board of Selectmen/Select Board
Tewksbury Town Hall
1009 Main Street
Tewksbury, MA 01876

RE: Notice of Intent to Abutters for Proposed Adult & Medical Use
Retail Marijuana Establishment
At 553 Main Street Unit 2, Tewksbury, MA 01876

Dear Sir/Madam:

Attached please find a copy of the Notice of Intent to Abutters for Proposed Adult & Medical Use Retail Facility at 553 Main Street Unit 2, Tewksbury, MA 01876. Said notice was provided to all abutters within 300 feet of the subject property.

Sincerely,

Executive Management
Lazy River Products - Tewksbury, LLC
553 Main St. Unit 2
Tewksbury, MA 01876
Email Address: info@lazyriverproducts.info

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): 5/7/2024
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).



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:

Lazy River Products - Tewksbury, LLC

Name of applicant's authorized representative:

William Cassotis

Signature of applicant's authorized representative:



Town of Tewksbury Abutters List

Map/Lot	Abutter	Abutter	Address	Town	ST	Zip	Book/Page	Location
21-23			10 APPLETREE RD	TEWKSBURY	MA	01876	18806/0102	10 APPLETREE RD
21-20			16 APPLETREE RD	TEWKSBURY	MA	01876	33072/02228	16 APPLETREE RD
21-39			55 SENECA RD	TEWKSBURY	MA	01876	21767/0004	55 SENECA RD
21-40			45 SENECA RD	TEWKSBURY	MA	01876	35742/0035	45 SENECA RD
21-43			45 NAVILLUS RD	TEWKSBURY	MA	01876	10350/0025	45 NAVILLUS RD
21-82			40 NAVILLUS RD	TEWKSBURY	MA	01876	37618/0123	40 NAVILLUS RD
22-72			PO BOX 800729	DALLAS	TX	75380	38787/1933	470 MAIN ST
22-105			4 APPLETREE RD	TEWKSBURY	MA	01876	22457/0041	4 APPLETREE RD
22-106			6 APPLETREE RD	TEWKSBURY	MA	01876	33236/02228	6 APPLETREE RD
34-24			32 ROGERS ST	TEWKSBURY	MA	01876	37803/0145	ROGERS ST
22-103			521 MAIN ST	TEWKSBURY	MA	01876	37710/0210	521 MAIN ST
21-84			30 KENNEDY RD	TEWKSBURY	MA	01876	29409/0231	30 KENNEDY RD
21-22			12 APPLETREE RD	TEWKSBURY	MA	01876	34571/0063	12 APPLETREE RD
34-80-U002			20 CHESTNUT ST	LYNNFIELD	MA	01940	38346/0199	553 MAIN ST
34-80-U003			2 REGENCY RIDGE	ANDOVER	MA	01810	19806/0076	553 MAIN ST
34-80-U005			375 COMMERCE PARK RD	N KINGSTON	RI	02852	25124/0291	553 MAIN ST
34-80-U001			375 COMMERCE PARK RD	N KINGSTON	RI	02852	25124/0291	553 MAIN ST
34-80-U004			2 REGENCY RIDGE	ANDOVER	MA	01810	19806/0076	553 MAIN ST
34-80-MAIN			150 EAST 58TH ST	NEW YORK	NY	10155	29996/0031	553 MAIN ST
21-19			18 APPLETREE ROAD	TEWKSBURY	MA	01876	2157/0001	18 APPLETREE RD
21-21			14 APPLETREE RD	TEWKSBURY	MA	01876	32547/0290	14 APPLETREE RD
21-24			21 THIRD AVE	LOWELL	MA	01854	02653/0408	8 APPLETREE RD
21-41			35 SENECA ROAD	TEWKSBURY	MA	01876	04179/0156	35 SENECA RD
21-42			25 SENECA RD	TEWKSBURY	MA	01876	32865/0059	25 SENECA RD
34-11			32 ROGERS ST	TEWKSBURY	MA	01876	37803/0145	32 ROGERS ST/ADJACENT
34-13			17 ROGERS ST	TEWKSBURY	MA	01876	18625/0031	17 ROGERS ST
34-14			7 ROGERS ST	TEWKSBURY	MA	01876	26250/0287	7 ROGERS ST
21-44			50 NAVILLUS RD	TEWKSBURY	MA	01876	32724/0010	50 NAVILLUS RD
35-3			540 MAIN ST	TEWKSBURY	MA	01876	29828/0238	540 MAIN ST
35-17			530 MAIN ST	TEWKSBURY	MA	01876	37505/6720	530 MAIN ST



Positive Impact Plan (Tewksbury)

Statement of Purpose

This Positive Impact Plan will outline the Goals, Programs, and Measurements defined by the Cannabis Control Commission (“CCC” or “Commission”) of the initiative(s) Lazy River Products – Tewksbury, LLC plans to engage in, in order to positively impact individuals disproportionately harmed by Cannabis Prohibition. Lazy River Products – Tewksbury, LLC is located in Tewksbury, MA, which is not considered an area of disproportionate impact, thus has selected the city of Lowell as an area which it will positively impact. The goal of Lazy River Products’ Positive Impact Plan is to assist in reducing barriers to entry into the cannabis industry to individuals located in areas of disproportionate impact, mainly in Lowell, Massachusetts. Specifically, Lazy River Products will strive to prioritize the hiring of individuals that are past or current residents living in a Massachusetts Area of Disproportionate Impact, and/or a Massachusetts resident with parents or spouses who have prior or current drug convictions.

Responsibilities

It is the Department of Human Resources responsibility to execute the detailed actions, activities, and processes that will be utilized and implemented to achieve the outlined goals of this Plan. One month before the submission to renew an LRP license, designated LRP agents, including members of management will meet to review the Positive Impact Plan. In the internal review, LRP will evaluate the plan and its measurements, analyzing the successes and failures, addressing potential adjustments.

1. **[GOAL 1] - Employ 35 individuals by the end of year one with 15% being classified as a past or current residents living in a Massachusetts Area of Disproportionate Impact, and/or a Massachusetts resident with parents or spouses who have prior or current drug convictions.**

[PROGRAM FOR GOAL 1]

Lazy River Products posts job openings when a vacancy occurs, at a minimum quarterly. The job is posted until we fill the position. We have posted at least 25 job posts internally/externally in the last 12 months:

External Job Posts

Lazy River Products utilizes an Applicant Tracking System called JazzHR. We have a dedicated page located on our website “Careers Page”, which shows the job posts when they are open/active. JazzHR also automatically publishes all of Lazy River Products’ job posts to the following list of online job boards:

1. [LinkedIn Basic](#)
2. [Glassdoor](#)
3. [ZipRecruiter](#)
4. [Google](#)
5. [Indeed](#)
6. [Adzuna](#)





7. [Talent.com](#)
8. [Jobcase.com](#)
9. [Job.com](#)
10. [Sercanto](#)
11. [Careerjet](#)
12. [The Muse](#)
13. [Oodle](#)
14. [MyJobHelper](#)

Internal Job Posts

Lazy River Products posts its job openings internally by work email to all staff, and hard copies of the internal job posts hung around the workplace. We encourage employees to refer to friends or family members that live or have lived in areas of disproportionate impact or has a spouse or parent with drug convictions. Our internal job posts are then summarized in our monthly Employee Newsletter.

When hiring, Lazy River Products will strive to employ individuals who come from Areas of Disproportionate Impact or have a spouse or parent with drug convictions.

- a. Lazy River Products' employment application includes a voluntary **Positive-Impact Survey**. This survey directly asks applicants if they have lived in areas of disproportionate addresses, and also asks if they have resided in the four cities that have certain areas within the city deemed areas of disproportionate impact.
- b. Human Resources will be required to enter all Lowell, Boston, Springfield, and/or Worcester addresses provided by applicants into the US Census Bureau tool (<https://geocoding.geo.census.gov/geocoder/geographies/address?form>) used to determine areas of disproportionate impact.
- c. Applicants who have a current or past home address located within an area of disproportionate impact or has a parent or spouse with drug convictions receive priority applicant status.

[MEASUREMENTS FOR GOAL 1]

In tracking efforts to employ individuals who are past or current residents living in a Massachusetts Areas of Disproportionate Impact, and/or individuals that are a Massachusetts resident with a parent or spouse who has prior or current drug conviction(s), the Human Resources Department shall:

- a. Use a master tracking sheet to record metrics of applicants and new hire's current residential address and associated Census Tract Code, which identifies if the current residential address at the time of employment derives from Areas of Disproportionate Impact. It will also track the applicants who have responded to the Positive-Impact Survey that they have previously resided in an AODI.
- b. Use a master tracking sheet to record a new hire's previous Lowell, MA residential address (or addresses), if applicable, and associated Census Tract Code, which identifies if the addresses derive from Areas of Disproportionate Impact, as well as any other cities they may have listed when responding to application Positive-Impact Survey question "Have you ever resided in any of the following cities? (please check off all that apply)", which lists all the cities in Massachusetts that are deemed Areas of Disproportionate Impact.





- c. Use a master tracking sheet to record a new hire's response from their Positive-Impact Survey question *"Do you have a spouse or a parent who has one or more drug convictions?"* which identifies if the individual has a spouse or parent with drug convictions.

2. [GOAL 2] - LRP employees completing 4 hours of community service or volunteer work with the Merrimack Valley Food Bank "MVFB", or any other Massachusetts based, Charitable Non-Profit that is doing work that positively affects AODI Lowell, MA.

[PROGRAM FOR GOAL 2]

All Lazy River Products employees are required to, but not limited to, participate in one of our volunteer events for a total of four hours annually. Our Volunteer Program consists of many different partnerships that will present volunteer opportunities throughout the year, including the Merrimack Valley Food Bank which specifically positively impacts individuals deriving from Areas of Disproportionate Impact in Lowell, MA.

[MEASUREMENTS FOR GOAL 2]

Through Lazy River Products' Human Resources department, the tracking of volunteer hours will be recorded on the employee's timecard. This will allow HR to publish "Volunteer Hours" reports at any time, to track and ensure all employees have met their annual volunteer requirement.

3. [GOAL 3] - Host annual Holiday Food drive supporting the Merrimack Valley Food Bank.

[PROGRAM FOR GOAL 3]

Lazy River Products will work with The Merrimack Valley Food Bank (MVFB), a 501C-3 non-profit organization located at 735 Broadway Street in Lowell. The MVFB provides food and personal care items to emergency feeding programs that serve the low-income, homeless, and hungry throughout Lowell. Lazy River Products has contacted and established a relationship with MVFB and plans to positively impact Lowell through programs listed within this Positive Impact Plan. Annually, Lazy River Products will host a holiday food drive, where customers and employees may donate food and other related resources at the company retail facility. Upon the end of the food drive, all donations will go toward the MVFB.

4. [GOAL 4] - Monetary donations made annually to non-profit organizations that positively impact individuals deriving from AODI through regular donations, a minimum of \$5,000 annually.

[PROGRAM FOR GOAL 4]

Each month, Lazy River Products designates a local NPO that positively impacts individuals deriving from AODI. The NPO's are promoted throughout its designated month for in-store customer/employee donations. At the end of the month, LRP matches the total amount that was donated during that month.





[MEASUREMENTS FOR GOAL 4]

The Human Resources Department uses a master tracking spreadsheet to organize, plan, and execute all designated NPO partnerships and associated donations, to ensure we reach the annual goal of at least \$5,000 toward NPOs that positively impact individuals deriving from AODI. Partnerships include:

1. Project Kompass offers an innovative approach to transition from homelessness to permanent independent living.
2. Merrimack Valley Food Bank is the hub for all food pantries for the Merrimack Valley.
3. Lowell General Hospital provides medical care to the region. Lazy River is a proud supporter of the TeamWalk for CancerCare.

Lazy River Products – Tewksbury, LLC looks forward to positively impacting the community it serves. We will review our non-profit recipients annually and ensure our contributions benefit individuals deriving from areas of disproportionate impact.

Positive Impact Plan Acknowledgments

Lazy River Products pledges to adhere to the requirements set forth in 935 CMR 500.105(4)(a) which provides the permitted advertising, branding, marketing, and sponsorship practices for all Marijuana Establishments. Lazy River Products likewise pledges not to employ any of the prohibited practices articulated in 935 CMR 500.105(4)(b). Finally, none of the actions taken or programs instituted by Lazy River Products will violate the Commission's regulations with respect to limitations on ownership or control or any other applicable state laws.

Related Documents

1. [CCC Guidance for Identifying Areas of Disproportionate Impact](#)
2. [CCC Guidance on Required Positive Impact Plan and Diversity Plan](#)
3. [Positive-Impact Survey](#)



Delaware

The First State

Page 1

*I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF
DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT
COPY OF THE CERTIFICATE OF FORMATION OF "LAZY RIVER PRODUCTS -
TEWKSBURY, LLC", FILED IN THIS OFFICE ON THE FOURTH DAY OF
NOVEMBER, A.D. 2022, AT 12:06 O`CLOCK P.M.*


Jeffrey W. Bullock, Secretary of State

7121770 8100
SR# 20223942376

You may verify this certificate online at corp.delaware.gov/authver.shtml

Authentication: 204784481
Date: 11-04-22

STATE OF DELAWARE
CERTIFICATE OF FORMATION
OF LIMITED LIABILITY COMPANY

The undersigned authorized person, desiring to form a limited liability company pursuant to the Limited Liability Company Act of the State of Delaware, hereby certifies as follows:

1. The name of the limited liability company is Lazy River Products - Tewksbury, LLC.

2. The Registered Office of the limited liability company in the State of Delaware is located at 850 New Burton Road, Suite 201 (street), in the City of Dover, Zip Code 19904. The name of the Registered Agent at such address upon whom process against this limited liability company may be served is Cogency Global Inc..

By: William Cassotis
Authorized Person

Name: William Cassotis
Print or Type

**BYLAWS
OF
LAZY RIVER PRODUCTS - TEWKSBURY, LLC**

**ARTICLE I
OFFICES AND RECORDS**

Section 1.1. PRINCIPAL OFFICE. The principal office of Lazy River Products - Tewksbury, LLC (the “Company”) shall be within or without the State of Delaware as set forth in the Company’s Certificate of Formation or subsequent filing with the State of Delaware.

Section 1.2. OTHER OFFICES. The Company may also have other offices at any places, within or without the State of Delaware, as the Board of Managers may designate, or as the business of the Company may require or as may be desirable.

**ARTICLE II
MEMBERS**

Section 2.1. PLACE OF MEETING. Meetings of the members (each a “Member”) shall be held either at the principal office of the Company or at any other place designated by the Board of Managers, either within or without the State of Delaware, as shall be designated in the notice of the meeting or executed waiver of notice.

Section 2.2. MEETINGS OF MEMBERS BY REMOTE COMMUNICATION. The Board of Managers may authorize Members not physically present at a meeting of Members to participate in a meeting of Members by means of remote communication and be deemed present and entitled to vote at the meeting, subject to any guidelines and procedures adopted by the Board of Managers.

The Board of Managers may also authorize that any annual or special meeting of Members shall be held solely by means of remote communication as set out this Section 2.2 without a physical assembly of Members.

Section 2.3. ANNUAL MEETING. An annual meeting of Members, for the purpose of electing Managers and transacting any other business as may be brought before the meeting, shall be held on the first Wednesday in May, or such other date as the Board of Managers may determine.

Failure to hold the annual meeting at the designated time shall not affect the validity of any action taken by the Company. If the Board of Managers fails to call the annual meeting, any Member may make demand in writing to any officer of the Company that an annual meeting be held.

Section 2.4. SPECIAL MEMBERS’ MEETINGS. Special meetings of the Members may be called:

- (a) by the Board of Managers;
- (b) by the President;
- (c) upon the demand of the holders of at least twenty-five percent (25%), or such lesser percentage as the Certificate of Formation may permit, of all the votes entitled to be cast on any issue proposed to be considered at the proposed special meeting.

Only business within the purposes described in the Company’s meeting notice may be conducted at a special meeting of the Members.

Section 2.5. RECORD DATE FOR MEMBER ACTION. For the purpose of determining Members entitled to notice of or to vote at any meeting of Members or any adjournment thereof, the record date shall be:

- (a) on the date fixed by the Board of Managers in the notice of the meeting;
- (b) at the close of business on the day before the first notice is delivered to Members, if no date is fixed by the Board of Managers; or
- (c) on the day before the Members’ meeting, if no notice of meeting is mailed to Members

For action by consent of the Members without a meeting, the record date for Members entitled to approve the action subject of the consent shall be:

- (a) on the date fixed by the Board of Managers; or
- (b) the date that the first Member signs the written consent, if no date is fixed by the Board of Managers.

A record date fixed under this Section may not be more than seventy (70) days before the meeting or action requiring a determination of Members. A determination of Members entitled to notice of or to vote at a Members' meeting is effective for any adjournment of the meeting unless the Board of Managers fixes a new record date, which it shall do if the meeting is adjourned to a date more than one hundred twenty (120) days after the date fixed for the original meeting.

Section 2.6. NOTICE OF MEMBERS' MEETING. Written notice of any annual or special meeting of Members shall be given to any Member entitled to notice not less than ten (10) days nor more than sixty (60) days before the date of the meeting. The Company is required to give notice only to Members entitled to vote at the meeting. The Company shall give written notice to any Member entitled to notice by mail or by electronic transmission. Written notice by mail is effective on deposit in the United States mail, if mailed postpaid and correctly addressed to the Member's address shown in the Company's current record of Members. Written notice by electronic transmission is effective by (a) facsimile telecommunication when directed to a number furnished by the Member for the purpose; (b) email when directed to an email address furnished by the Member for the purpose; (c) posting on an electronic network together with separate notice to the Member of such specific posting, directed to an email address furnished by the Member for the purpose; or (d) any other form of electronic transmission when directed to the Member in the manner specified by the Member.

Any person entitled to notice of a meeting may sign a written waiver of notice either before or after the time of the meeting. The participation or attendance at a meeting of a person entitled to notice constitutes waiver of notice, except where the person attends for the specific purpose of objecting to the lawfulness of the convening of the meeting.

Section 2.7. VOTING LISTS. The officer or agent having charge of the share transfer records for shares of the Company shall prepare an alphabetical list of all Members entitled to notice of the meeting, arranged by voting group and by class and series of share, with the address of and the number of shares held by each Member. The list shall be available for inspection by any Member beginning two (2) business days after notice of the meeting is given at the principal place of business of the Company or if the meeting will be held at another location, at a place in the city where the meeting will be held, which shall be identified in the meeting notice.

The list shall also be produced and kept open at the time and place of the meeting and shall be subject to the inspection of any Member during the whole time of the meeting.

Section 2.8. QUORUM OF MEMBERS. A quorum shall be present for action on any matter at a Member meeting if a majority of the votes entitled to be cast on the matter by a voting group is represented at the meeting in person or by proxy. A voting group includes all shares of one or more classes or series that are entitled, to vote and to be counted together collectively on a matter at a meeting of Members.

Once a quorum for a voting group has been established at a meeting, the Members in that voting group represented in person or by proxy at the meeting are deemed present for quorum purposes for the remainder of the meeting and for any adjournment unless: (a) the Member attends the meeting solely to object to defective notice or the conduct of the meeting on other grounds and does not vote the shares or take any other action at the meeting; or (b) the meeting is adjourned and a new record date is set for the adjourned meeting.

The Members in a voting group represented in person or by proxy at a meeting of Members, even if not comprising a quorum, may adjourn the meeting as to the voting group until a time and place as may be determined by a vote of the holders of a majority of the shares of the voting group represented in person or by proxy at that meeting. If the meeting is adjourned for more than one hundred twenty (120) days after the date fixed for the original meeting, a new quorum for the meeting must be established.

Section 2.10. VOTING OF SHARES. Each outstanding share, regardless of class, shall be entitled to one vote on each matter submitted to a vote at a meeting of Members.

Section 2.11. VOTING BY PROXY OR NOMINEE. Shares of the Company's stock owned by the Company itself or by another Company or entity, the majority of the voting stock or interest of which is owned or controlled by the Company, shall not be voted, directly or indirectly, at any meeting, and shall not be counted in determining the total number of outstanding shares at any given time. Nothing in this section shall be construed as limiting the right of the Company or any domestic or foreign Company or other entity to vote shares, held or controlled by it in a fiduciary capacity, or with respect to which it otherwise exercises voting power in a fiduciary capacity.

A Member may vote either in person or by proxy executed in writing by the Member or his or her attorney-in-fact. An appointment of a proxy is effective when received by the Secretary or other officer or agent authorized by the Company to tabulate votes. No proxy shall be valid after eleven (11) months from the date of its execution unless otherwise provided in the proxy. A proxy shall be revocable unless the proxy form conspicuously states that the proxy is irrevocable and the proxy is coupled with an interest as defined in the Massachusetts Limited Liability Company Act. An appointment made irrevocable is revoked when the interest with which it is coupled is extinguished. The death or incapacity of the Member appointing a proxy shall not affect the right of the Company to accept the proxy's authority unless notice of the death or incapacity is received by the Secretary or other officer or agent authorized to tabulate votes before the proxy exercises his or her authority under the appointment.

Shares owned by another Company, domestic or foreign, may be voted by any officer, agent, or proxy as the bylaws of that Company may authorize or, in the absence of authorization, as the Board of Managers of that Company may determine.

An administrator, executor, guardian, or conservator may vote shares held in that fiduciary capacity if the shares forming a part of an estate are in the possession and forming a part of the estate being served by the fiduciary, either in person or by proxy, without a transfer of the shares into the fiduciary's name. A trustee may vote shares standing held in trustee's name, either in person or by proxy, but no trustee shall be entitled to vote shares held by him or her without a transfer of the shares into his or her name as trustee.

A receiver may vote shares standing in the name of a receiver and may vote shares held by or under the control of a receiver without the transfer thereof into the receiver's name if authority so to do be contained in an appropriate order of the court by which the receiver was appointed.

A Member whose shares are pledged shall be entitled to vote the shares until the shares have been transferred into the name of the pledgee, and thereafter the pledgee shall be entitled to vote the shares transferred, subject to any agreements containing restrictions on the hypothecation, assignment, pledge, or voluntary or involuntary transfer of shares.

Section 2.12. ACTION BY MEMBERS WITHOUT A MEETING. Any action required or permitted to be taken at any annual or special meeting of Members may be taken without a meeting, if a consent or consents in writing, setting forth the action so taken, shall have been signed by the holder or holders of shares with at least the minimum number of votes necessary to take the action at a meeting at which all Members entitled to vote on the action are present and voting. The action shall be evidenced by one or more written consents that (a) describe the action taken, (b) are signed by Members having the requisite votes, (c) bear the date of the signatures of such Members, and (d) are delivered to the Company for inclusion with the records of meetings within sixty (60) days of the earliest dated consent delivered to the Company.

If the action to be taken pursuant to the consent of voting Members without a meeting is one for which notice to all Members would be required by law if the action were to be taken at a meeting, then the Company shall, at least seven (7) days before the action is taken, give notice in the manner specified by Section 2.6 to all nonvoting Members.

ARTICLE III

MANAGERS

Section 3.1. BOARD OF MANAGERS. All corporate power shall be exercised by or under the authority of, and the business and affairs of the Company shall be managed under the direction of, the Board of Managers, except such powers expressly conferred upon or reserved to the Members, and subject to any limitations set forth by law, by the Certificate of Formation or by these Bylaws. Managers need not be residents of the State of Delaware or Members of the Company. Managers shall be appointed by the Members.

Section 3.2. NUMBER OF MANAGERS. The number of Managers shall be four (4) provided that the number may be increased or decreased from time to time by an amendment to these Bylaws or resolution adopted by Members holding a majority of all outstanding shares. No decrease in the number of Managers shall have the effect of decreasing the number of Managers below the minimum number of individuals permitted by law, nor shall have the effect of shortening the term of any incumbent Manager.

Section 3.3. TERM OF OFFICE. At the first annual meeting of Members and at each annual meeting thereafter, the holders of shares entitled to vote in the election of Managers shall elect Managers to hold office until the next succeeding annual meeting, the Manager's successor has been selected and qualified, or the Manager's earlier death, resignation, or removal.

Despite the expiration of a Manager's term, he or she shall continue to serve until his or her successor is elected and qualified or until there is a decrease in the number of Managers.

Section 3.4. REMOVAL. Managers may be removed from office at any time with or without cause by the Members entitled to elect them. A Manager may be removed by Members or Managers only at a meeting called for that purpose, for which the notice must state that the purpose, or one of the purposes, of the meeting is removal of the Manager or Managers.

Section 3.5. RESIGNATION. Except as otherwise required in the Company's Operating Agreement, a Manager may resign at any time by giving notice in the form of an executed resignation to the Board of Managers, its chairman, or to the Company. A resignation is effective when the notice is delivered unless the notice specifies a future date. Acceptance of the resignation shall not be required to make the resignation effective. The pending vacancy may be filled before the effective date in accordance with Section 3.6 of these Bylaws, but the successor shall not take office until the effective date.

Section 3.6. VACANCIES. Vacancies and newly created Managerships, whether resulting from an increase in the size of the Board of Managers, or due to the death, resignation, disqualification or removal of a Manager or otherwise, may be filled by election at an annual or special meeting of Members called for that purpose by the Members or the affirmative vote of a majority of the remaining Managers then in office, even though less than a quorum of the Board of Managers.

A vacancy that will occur at a specific later date may be filled before the vacancy occurs, but the new Manager may not take office until the vacancy occurs. Any elected to fill a vacancy shall serve until the next Members' meeting at which Managers are elected.

Section 3.7. MEETINGS OF MANAGERS. A regular meeting of the newly-elected Board of Managers shall be held without other notice immediately following each annual meeting of Members, at which the board shall elect officers and transact any other business as shall come before the meeting. Other regular and special meetings of the Managers may be held at such times and places within or outside the State of Delaware as the Managers may fix. Special meetings of the Board of Managers may be called by the President, by the Chairman of the Board, if any, by the Secretary, by any two Managers, or by one Manager in the event that there is only one Manager.

Section 3.8. MEETINGS OF MANAGERS BY REMOTE COMMUNICATION. The Board of Managers may permit any or all Managers to participate in any meeting by, or conduct the meeting through the use of, any means of communication by which all Managers participating may simultaneously hear each other during the meeting. A Manager participating in a meeting by this means is considered to be present in person at the meeting.

Section 3.9. NOTICE OF MANAGERS' MEETINGS. Regular meetings may be held without notice of the date, time, place, or purpose of the meeting. All special meetings of the Board of Managers shall be held upon not less than two (2) days' notice. Such notice shall state:

- (a) the date and time of the meeting;
- (b) the place of the meeting;
- (c) the purpose or purposes for which the meeting is called if the meeting is a special meeting.

The Company or person calling the meeting shall give notice of the meeting to each Manager personally, by telephone or voice mail, by mail, by electronic transmission if consented to by the Manager, or by messenger or delivery service. Notice to each Manager shall also be given by electronic transmission at the Manager's last known e-mail address.

A written waiver of the required notice signed by a Manager entitled to the notice, before or after the meeting, is the equivalent of giving notice to the Manager who signs the waiver. A Manager's attendance at any meeting shall constitute a waiver of notice of the meeting, except where the Manager attends a meeting for the express purpose of objecting to the transaction of any business on the grounds that the meeting is not lawfully called or convened.

Section 3.10. QUORUM AND ACTION OF MANAGERS. A majority of the number of Managers shall constitute a quorum for the transaction of business. The act of the majority of the Managers present at a meeting at which a quorum is present at the time of the act shall be the act of the Board of Managers, unless the act of a greater number is required by law, the Certificate of Formation, or these Bylaws. The Managers at a meeting for which a quorum is not present may adjourn the meeting until a time and place as may be determined by a vote of the Managers present at that meeting.

Section 3.11. COMPENSATION. Managers shall not receive any stated salary for their services, but by resolution of the Board of Managers a fixed sum and expenses of attendance, if any, may be allowed for attendance at any meeting of the Board of Managers or committee thereof. A Manager shall not be precluded from serving the Company in any other capacity and receiving compensation for services in that capacity.

Section 3.12. ACTION BY MANAGERS WITHOUT A MEETING. Unless otherwise provided by these Bylaws, any action required or permitted to be taken at a meeting of the Board of Managers or any committee thereof may be taken without a meeting if all members of the Board of Managers, or all committee members then appointed, consent to such action in writing or by electronic transmission and the writings or electronic transmissions are filed with the minutes of the proceedings of the Board of Managers.

Section 3.13. COMMITTEES OF THE BOARD OF MANAGERS. The Board of Managers, by resolution adopted by a majority, may designate one or more Managers to constitute one or more committees, to exercise the authority of the Board of Managers to the extent provided in the resolution of the Board of Managers and allowed under the law of the State of Delaware.

ARTICLE IV

OFFICERS

Section 4.1. POSITIONS AND APPOINTMENT. The officers of the Company shall be appointed by the Board of Managers and shall

be a President, a Treasurer, a Secretary, and any other officers, including assistant officers and agents, as may be deemed necessary by the Board of Managers. Any two or more offices may be held by the same person.

Each officer shall serve until a successor is elected and qualified or until the death, resignation or removal of that officer. Vacancies or new offices shall be filled at the next regular or special meeting of the Board of Managers. Election or appointment of an officer or agent shall not of itself create contract rights.

Section 4.2. REMOVAL AND RESIGNATION. Any officer appointed or elected by the Board of Managers may be removed with or without cause by the affirmative vote of the majority of the Board of Managers at any regular or special meeting. Any officer or assistant officer appointed by an authorized officer may be removed at any time with or without cause by any officer with authority to appoint such officer or assistant officer. Removal shall be without prejudice to the contract rights, if any, of the officer so removed.

Any officer may resign at any time by delivering notice to the Company. Resignation is effective when the notice is delivered unless the notice provides a later effective date.

Any vacancies may be filled in accordance with Section 4.1 of these Bylaws.

Section 4.3. POWERS AND DUTIES OF OFFICERS. The powers and duties of the officers of the Company shall be as provided from time to time by resolution of the Board of Managers or by direction of an officer authorized by the Board of Managers to prescribe the duties of other officers. In the absence of such resolution, the respective officers shall have the powers and shall discharge the duties customarily and usually held and performed by like officers of Companies similar in organization and business purposes to the Company subject to the control of the Board of Managers.

ARTICLE V

INDEMNIFICATION OF MANAGERS AND OFFICERS

The Company shall indemnify a Manager or officer who was wholly successful, on the merits or otherwise, in the defense of any proceeding to which he or she was a party because he or she was a Manager or officer of the Company against reasonable expenses incurred by him or her in connection with the proceeding.

The Company may, to the fullest extent permitted by law, indemnify each person who may serve or who has served at any time as a Manager or officer of the Company or of any of its subsidiaries, or who at the request of the Company may serve or at any time has served as a Manager, officer, administrator or trustee of, or in a similar capacity with, another organization or any employee benefit plan, against all expenses and liabilities, including counsel fees, reasonably incurred by or imposed upon such person in connection with any proceeding in which he may become involved by reason of his serving or having served in such capacity.

The indemnification provided hereunder shall inure to the benefit of the heirs, executors and administrators of a Manager, officer or other person entitled to indemnification hereunder.

The foregoing right of indemnification shall be in addition to and not exclusive of any other rights which such Manager or officer or other person may be entitled under the Certificate of Formation, any agreement, or pursuant to any action taken by the Managers or Members of the Company or otherwise.

ARTICLE VI

SHARE CERTIFICATES AND TRANSFER

Section 6.1. CERTIFICATES REPRESENTING SHARES. Shares may be certificated or uncertificated. If the shares are uncertificated, the Company shall record any share transfer in the Company's books and records. In the event the shares are certificated, the certificates representing shares of the Company shall state:

- (a) the name of the Company and that it is organized under the laws of the State of Delaware;
- (b) the name of the person to whom issued;
- (c) the number and class of shares and the designation of the series, if any, which the certificate represents; and
- (d) a conspicuous statement setting forth restrictions on the transfer of the shares, if any.

No share shall be issued until the consideration therefor, fixed as provided by law, has been fully paid.

Section 6.2. REGISTERED MEMBERS. The Company may treat the registered owner of any shares issued by the Company as the holder in fact thereof, for purposes of voting those shares, receiving distributions thereon or notices in respect thereof, transferring those shares, exercising rights of dissent with respect to those shares, exercising or waiving any preemptive right with respect to those shares, entering into agreements with respect to those shares in accordance with the laws of the State of Delaware, or giving proxies with respect to those shares.

Neither the Company nor any of its officers, Managers, employees, or agents shall be liable for treating that person as the owner of those shares at that time for those purposes, regardless of whether that person possesses a certificate for those shares and shall not be bound to recognize any equitable or other claim to or interest in such share or shares on the part of any other person, whether or not it shall have express notice thereof, except as otherwise provided by law.

Section 6.3. LOST CERTIFICATES. The Company may issue a new certificate for its shares in place of any certificate theretofore issued and alleged by its owner of record or such owner's authorized representative to have been lost, stolen, or destroyed if the Company, transfer agent, or registrar is not on notice that such certificate has been acquired by a bona fide purchaser.

A new certificate may be issued in lieu of any certificate previously issued that has become defaced or mutilated upon surrender for cancellation of a part of the old certificate sufficient, in the opinion of the Secretary and the transfer agent or the registrar, if any, to identify the owner of the defaced or mutilated certificate, the number of shares represented thereby, and the number of the certificate and its authenticity and to protect the Company and the transfer agent or the registrar against loss or liability. When sufficient identification for such defaced or mutilated certificate is lacking, a new certificate may be issued upon compliance with all of the conditions set forth in this Section in connection with the replacement of lost, stolen, or destroyed certificates.

ARTICLE VII

MISCELLANEOUS

Section 7.1. SEAL. The Company may adopt a corporate seal in a form approved by the Board of Managers. The Company shall not be required to use the corporate seal and the lack of the corporate seal shall not affect an otherwise valid contract or other instrument executed by the Company.

Section 7.2. CHECKS, DRAFTS, ETC. All checks, drafts or other instruments for payment of money or notes of the Company shall be signed by an officer or officers or any other person or persons as shall be determined from time to time by resolution of the Board of Managers.

Section 7.3. FISCAL YEAR. The fiscal year of the Company shall be as determined by the Board of Managers.

Section 7.4. CONFLICT WITH APPLICABLE LAW OR CERTIFICATE OF FORMATION. These Bylaws are adopted subject to any applicable law and the Certificate of Formation. Whenever these Bylaws may conflict with any applicable law or the Certificate of Formation, such conflict shall be resolved in favor of such law or the Certificate of Formation.

Section 7.5. INVALID PROVISIONS. If any one or more of the provisions of these Bylaws, or the applicability of any provision to a specific situation, shall be held invalid or unenforceable, the provision shall be modified to the minimum extent necessary to make it or its application valid and enforceable, and the validity and enforceability of all other provisions of these Bylaws and all other applications of any provision shall not be affected thereby.

ARTICLE VIII

AMENDMENT OF BYLAWS

Section 8.1. MEMBERS. These Bylaws may be amended, repealed, or otherwise altered by the Members.

Section 8.2. BOARD OF MANAGERS. As authorized by the Certificate of Formation, the Board of Managers may also make, amend, or repeal, subject to any provision of the Delaware Limited Liability Company Act, the Certificate of Formation, or a bylaw adopted by the Members that reserves the power exclusively to the Members or otherwise restricts the authority of the Board of Managers.

F

The Commonwealth of Massachusetts

William Francis Galvin

Secretary of the Commonwealth

One Ashburton Place, Room 1717, Boston, Massachusetts 02108-1512

Foreign Limited Liability Company

Application for Registration

(General Laws Chapter 156C, Section 48)

Federal Identification No.: ____

(1a) The exact name of the limited liability company:

Lazy River Products - Tewksbury, LLC

(1b) If different, the name under which it proposes to do business in the Commonwealth of Massachusetts:

(2) The jurisdiction* where the limited liability company was organized:

Delaware

(3) The date of organization in that jurisdiction: 11/4/2022

(4) The general character of the business the limited liability company proposes to do in the Commonwealth:

To apply for a license with the Cannabis Control Commission

(5) The business address of its principal office:

553 Main St. Unit 2

Tewksbury, MA 01876

(6) The business address of its principal office in the Commonwealth, if any:

553 Main St. Unit 2

Tewksbury, MA 01876

(7) The name and business address, if different from principal office location, of each manager:

Lazy River Products, LLC:

145 Broadway Road, Unit 2

Dracut, MA 01826

- (8) The name and business address of each person authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property recorded with a registry of deeds or district office of the land court:

NAME

ADDRESS

William Cassotis

145 Broadway Road, Unit 2
Dracut, MA 01826

- (9) The name and street address of the resident agent in the Commonwealth:

Cogency Global Inc.
45 School Street, Suite 202
Boston, MA 02108

- (10) The latest date of dissolution, if specified: _____

- (11) Additional matters:

Signed by (by at least one authorized signatory): William Cassotis

I _____,
resident agent of the above limited liability company, consent to my appointment as resident agent pursuant to G.L. c156C § 48
(or attach resident agent's consent hereto).

** Attach a certificate of existence or good standing issued by an officer or agency properly authorized in home state.*



Lazy River Products, LLC

11.7.2022

145 Broadway Rd Unit 2

Dracut, MA 01826

To Whom It May Concern,

I, William Cassotis, as an authorized representative of Lazy River Products, LLC, allow Lazy River Products – Tewksbury, LLC to use this name in Massachusetts”.

Thank you,

William Cassotis

William Cassotis

President/CEO

Lazy River Products, LLC

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "LAZY RIVER PRODUCTS - TEWKSBURY, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE SEVENTH DAY OF NOVEMBER, A.D. 2022.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "LAZY RIVER PRODUCTS - TEWKSBURY, LLC" WAS FORMED ON THE FOURTH DAY OF NOVEMBER, A.D. 2022.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN ASSESSED TO DATE.



7121770 8300

SR# 20223954691

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed in a small font.

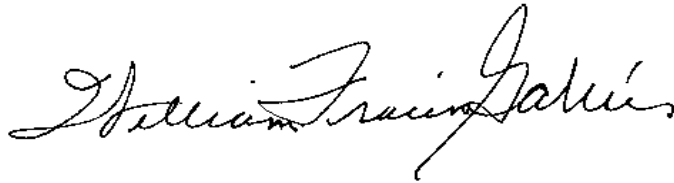
Authentication: 204795763

Date: 11-07-22

THE COMMONWEALTH OF MASSACHUSETTS

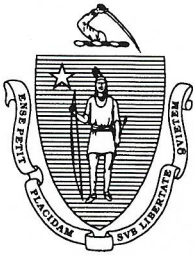
I hereby certify that, upon examination of this document, duly submitted to me, it appears that the provisions of the General Laws relative to corporations have been complied with, and I hereby approve said articles; and the filing fee having been paid, said articles are deemed to have been filed with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

December 06, 2022 09:21 AM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive style with a large, stylized 'G' at the end.

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth



William Francis Galvin
Secretary of the
Commonwealth

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

January 19, 2024

TO WHOM IT MAY CONCERN:

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

LAZY RIVER PRODUCTS - TEWKSBURY, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **December 6, 2022.**

I further certify that said Limited Liability Company has filed all annual reports due and paid all fees with respect to such reports; that said Limited Liability Company has not filed a certificate of cancellation or withdrawal; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 72 for revocation of said Limited Liability Company's authority to transact business in the Commonwealth; and that said Limited Liability Company is in good standing with this office.

I also certify that the names of all managers listed in the most recent filing are: **LAZY RIVER PRODUCTS, LLC**

I further certify that the name of persons authorized to act with respect to real property instruments listed in the most recent filings are: **WILLIAM CASSOTIS**



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



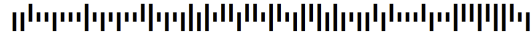
Commonwealth of Massachusetts
Department of Revenue
Geoffrey E. Snyder, Commissioner

mass.gov/dor

Letter ID: L1402056864
Notice Date: January 18, 2024
Case ID: 0-002-279-579



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



LAZY RIVER PRODUCTS - TEWKSBURY,
553 MAIN ST STE 2
TEWKSBURY MA 01876-1857

Why did I receive this notice?

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

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

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

What if I have questions?

If you have questions, call us at (617) 887-6400 or toll-free in Massachusetts at (800) 392-6089, Monday through Friday, 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



Lazy River Products - Tewksbury, LLC

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Executive Summary

Lazy River Products began its journey immediately following the issuance of Adult Use Cannabis Legislation in Massachusetts. At that time we engaged with the Town of Dracut and its representatives to discuss our plan to bring Lazy River Products to Dracut and to the Massachusetts Cannabis Market. Dracut was an early adopter of Adult Use Cannabis and the

Town took an early vote that led to Dracut becoming a “yes” community. That was about 4 years ago now.

Since then we have made substantial investments in the town including the purchase of an appropriately zoned parcel of land, where we have built a state of the art ~40k sq ft Manufacturing, Cultivation and Retail Facility. The property has 19 additional acres able to be developed, that will house all of our future canopy needs under the one Cultivation License, all on the same property. Plans are already in development for building 2 leaving our new focus on finding our next host community for Retail. We hope Tewksbury will seriously consider a partnership with Lazy River Products and its Team. We would value that opportunity greatly.

We should also note that Lazy River Products is NOT Big Cannabis. We are a local, small business. The 3 founders of the company all grew up in Southern NH and have spent most, if not all of their professional careers working in Massachusetts. All have extended family throughout this great Commonwealth and are committed to following through and delivering Tewksbury a Cannabis Retail site that the neighborhood and its residents can all be proud of.

From the beginning Lazy River Products has had an enormous focus on community growth and giving back. We have a proven track record of working with organizations such as The Clean River Project, Merrimack Valley Food Bank, End 68 Hours Of Hunger, Lowell Humane Society, Dollars for Scholars and more. Lazy River Products also hosts a number of their own events every year including The Broadway Rd Cleanup Project, Food Drives for the Merrimack Valley Food Bank and more. The causes and impact we have made already in the Greater Lowell Area have been significant. Our goal would be to bring that same level of community giving and community building to Tewksbury, only furthering our commitment to the Greater Lowell Area.

Mission

At Lazy River Products, it is our mission to be recognized as the Commonwealths premier fully integrated cannabis-based Product Development Company and Retailer.

Our goal is to consistently deliver trusted small batch, craft quality products and exceptional service to our customers and the local communities for which we serve.

At our core we provide professional, compliant and socially responsible standards that raise the bar and will be the new definition for excellence in the Cannabis Industry here in Massachusetts.

We will always diligently work within each of the local communities we touch to help facilitate strategies to further enhance economic opportunity, build strong neighborhoods and provide a solid framework for quality growth and development.

“Give Back, Grow, Succeed”

Business & Industry Overview

Cannabis in the United States has come a long way. Over the past few decades, the US has experienced an explosion of cannabis activity coupled with a flurry of legislature.

A 2018 Pew Research Center study stated that 62% of Americans approve legalization of marijuana.¹ This figure has doubled since 2000 when it was only at 31% and has grown every year since.

This growth hasn't only taken place in the US. In general, global acceptance of cannabis has been growing and is expected to continue for the future. According to a Forbes article regarding a comprehensive study conducted by Arcview Market Research and BDS Analytics, "over the next 10 years the legal cannabis Industry will see much progress around the globe. Spending on legal cannabis worldwide is expected to hit \$57 Billion by 2027. The adult use (recreational) market will cover 67% of the spending; medical marijuana will make up the remaining 33%."²

The article further states that "the largest group of cannabis buyers will be in North America, going from \$9.2 Billion in 2017 to \$47.3 Billion a decade later."

Nationally, 19 states and the District of Columbia have legalized recreational, adult-use, marijuana. In addition to these states, 41 states allow for some form of medical marijuana.

- *The marijuana industry will create an estimated \$28B-\$34B economic impact in 2018. By 2022, that could soar past \$75B annually. (Estimates for the industry's economic impact are based on retail marijuana sales and incorporates a multiplier of 3.5 for every \$1 consumer or patients spend at dispensaries or rec stores, another \$2.50 in economic benefit is created in cities, states, and nationwide.)*
- *In 2017, sales of medical and recreational cannabis in the U.S. were nearly nine times higher than Oreo cookies and almost on par with America's collective spending on Netflix subscriptions.*
- *With the addition of California's recreational market sales in 2018, cannabis sales could easily eclipse McDonald's annual U.S. revenue.*

Total demand for marijuana in the U.S., including the black market, is around \$52.5 billion.

¹Geiger, Abigail, and Hannah Hartig. "62% of Americans Favor Legalizing Marijuana." Pew Research Center. October 08, 2018. Accessed November 27, 2018. <http://www.pewresearch.org/fact-tank/2018/10/08/americans-support-marijuana-legalization/>.

² Pellechia, Thomas. "Legal Cannabis Industry Poised For Big Growth, In North America And Around The World." Forbes. March 01, 2018. Accessed November 27, 2018. <https://www.forbes.com/sites/thomaspellechia/2018/03/01/double-digit-billions-puts-north-america-in-the-worldwide-cannabis-market-lead/#2a604ef06510>.

Selection of Tewksbury

In November of 2016, 53.7% of the registered voters in the Commonwealth of Massachusetts (1,769,328 people) voted on Question 4 to legalize the sale of recreational marijuana. Since the legislature passed, Massachusetts has formed the Cannabis Control Commission allowing for the development of sound laws regulating this new industry.

As of December 2018, there had been 190 Adult Use applications submitted to the Cannabis Control Commission, with a small percentage of those being in Northern Middlesex County, the home of Tewksbury. Although things have progressed with the issuance of new licenses the Massachusetts market is still primed for growth.

Leafly recently reported that over the previous 12 months Americans purchased \$17.9 Billion in Cannabis and Cannabis related products. With New Frontier Data projecting the market to grow by a Compounded Annual Growth Rate (CAGR) of 21% to reach more than \$41 Billion by 2025, Lazy River Products is poised to capture in on its share of this new and “blooming” Industry.

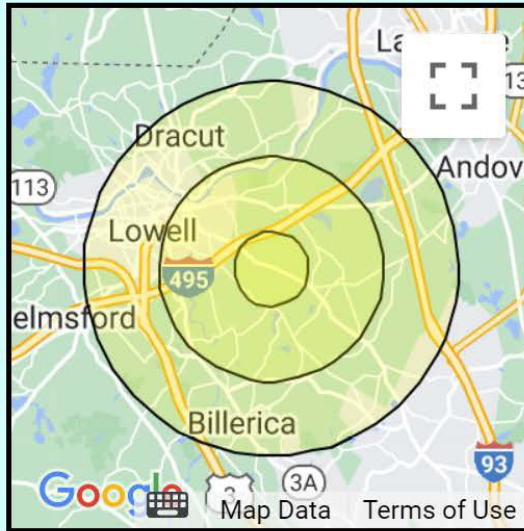
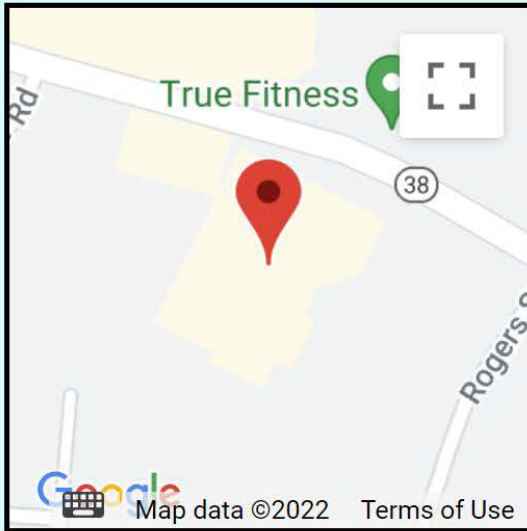
Lazy River Products Tewksbury location is located at 553 Main St. Tewksbury, MA

Location: Tewksbury, MA

Address: 553 Main St Tewksbury, MA

Latitude: 42° : 37' : 06"

Longitude: -71° : 15' : 11"



Description	1 Miles	3 Miles	5 Miles
DEMOGRAPHIC OVERVIEW			
Population	6,489	53,608	184,825
Households	2,438	19,748	66,387
Total Household Income (\$)	250,293,032	1,828,668,376	5,856,287,804
Median Household Income (\$)	90,472	75,843	71,433
Median Age	43.3	38.8	36.7
POPULATION BY RACE			
White Population	5,982	44,019	138,857
Black Population	88	1,823	7,644
Asian, Pacific Islander Population	304	4,274	24,028
American Indian and Alaska Native Population	1	87	357
Other Race Population	36	2,247	9,312
Two or More Races Population	78	1,158	4,627
POPULATION BY ETHNICITY			
Hispanic Population	119	4,636	19,264
White Non-Hispanic	5,909	41,606	130,049
BLOCK GROUP COUNT	3	36	130

Approach

State-of-the-Art facilities, techniques and business practices are the cornerstone of Lazy River Products' business model. Lazy River Products' management team is led by seasoned business leaders and real estate developers who will leverage their skills to optimize the build out process. Lazy River Products' action plan spells out the steps it will take towards launch and growth of the company.

Lazy River Products plans to seek an additional Marijuana **Retailer** license through the Massachusetts' Cannabis Control Commission for its newly proposed Tewksbury location.

Lazy River Products plans to retrofit the existing 8,700 sq ft located at 553 Main St. in Tewksbury. The space will be converted into a state of the art, Lazy River Retail storefront to mimic our flagship location in Dracut, MA. We will be using the same seasoned construction group that built our 40,000 sq ft of Retail and Manufacturing space in Dracut to manage this build-out project. Further details with respect to the facility's layout and features will be highlighted in future planning discussion with the Special Board in Tewksbury.

Economic Impact

Retail Sales – Lazy River Products is a product manufacturer and retailer, selling both its own branded line of products but also those from a few specialized manufacturers and wholesalers. Lazy River Products anticipates retail sales in Q2, 2023. Projected retail sales are detailed below.

Medical Sales – Lazy River Products has already initiated with the State of Massachusetts and the CCC to apply for its Medical Licensing. Since Lazy River Products is already fully integrated in Dracut, this allows us to produce and provide Medical Cannabis and Medical Products to customers with a Massachusetts Medical Registration Card once licensed. Standard Retailers that are NOT fully integrated are NOT allowed to sell to Medical Patients. This will allow Lazy River Products to attract an entire segment of the market that other standard Retailers won't be able to sell to. The benefit of that to Tewksbury is that we can service the residents that require medical for their ailments and better care for them with the products we'll be able to provide to them. By virtue of that we are also able to increase our sales revenue henceforth increasing the local excise tax paid back to Tewksbury.

Host Community Fees & Giving – Lazy River Products has yet to receive its Host Community Agreement with the Town of Tewksbury. As a part of this agreement Lazy River Products plans and agrees to pay all of the associated taxes for operating a Cannabis Retail Operation in Massachusetts, including the 3% local excise tax going back to Tewksbury.

Job Creation – Lazy River Products intends to create numerous full-time jobs and plans to make a best faith effort in giving priority access to all Tewksbury residents whenever possible for all of those positions. Lazy River Products pays well above minimum wage.

Charitable Giving – Lazy River Products also plans to adhere to a similar level of charitable giving as it does in Dracut already. In 2021 Lazy River Dracut contributed \$8,892.06 to local charities and causes, in only 9 months of being operational. So far in 2022, we've collected and have donated \$22,969.21 in the first 10 months of the year.

Full Time Employees

COUNT	POSITION	BREAKDOWN PER ROLE	
		(for reference)	
1	Manager		
1	Asst Manager		
3	TEAM LEADS		
28	CSR	2	Guest Relations
		10	Checkout Associate
		4	Floater
		4	Floor Sales Associate
		2	Runners
		6	Fulfillment
6	Security		
Total = 39 FTE's			

Projections

	2023	2024	2025
Target Population	184825	184825	184825
Avg Customers Per Day	300	400	450
Sales Day Per Month	26	26	26
Avg Purchase Amount	85	80	75
Retail Sales Total	\$ 7,956,000.00	\$10,608,000.00	\$10,530,000.00

Lazy River Products targets between 1-3% of the population of its surrounding areas, which accounts for competition, those unqualified to be customers and other market factors. We expect an adoption phase beginning with only 30-40 customers per day, scaling up to an average of over a hundred by the end of the first year of operations. With ample space and POS terminals at the dispensary, Lazy River Products will easily be able to serve this number of customers and more.

Lazy River Products projects an average ticket amount of \$85.00, which is lower than the current average recreational purchase in the state. The decrease is due to factors such as more product availability by the time of opening and slight market maturation.

Operating Statements

Operating Statement						
		2023		2024		2025
Flower Sales		\$4,375,800		\$5,834,400		\$5,791,500
MIP's/Concentrates		\$3,580,200		\$4,773,600		\$4,738,500
Total Revenue		\$7,956,000		\$10,608,000		\$10,530,000
	growth			33.33%		-0.74%
Dispensary Payroll		\$ 900,000		\$ 1,080,000		\$ 1,080,000
Dispensary Op Ex		\$ 186,287		\$ 152,685		\$ 179,562
S/Total Disp		\$ 1,086,287		\$ 1,232,685		\$ 1,259,562
Operating Result		\$ 6,869,713		\$ 9,375,315		\$ 9,270,438
				36.47%		-1.12%
G&A Overhead		\$2,104,464		\$2,221,458		\$2,388,452
Charitable Contributions		\$8,000		\$15,000		\$20,000
Total Combined Expenses		\$2,112,464		\$2,236,458		\$2,408,452
EBITA		\$4,757,249		\$7,138,857		\$6,861,986

Lazy River Products is self-funded entirely by its founding members, putting it at less risk of facing delays due to a capital raise or lack of resources. This is a crucial piece to Lazy River Products success, allowing the company to move quickly and nimbly past any issues that may arise in the area of financing.

Capital Contribution \$3,200,000

Dispensary Buildout \$1,800,000

Retail Burn \$900,000

Total \$2,700,000

Company Profile- Management

William Cassotis – Chief Executive Officer

William was one of the original Franchisees with Planet Fitness and came to that business from a professional career in high tech at the time. William began his career with Planet 20+ years ago. William was one of the original 3 Franchisees that took a risk very early on with what was at the time, just a small local gym chain looking to expand their presence. That opportunity parlayed itself into a franchise group that was doing in excess of \$30 Mil in Sales per year, across 20 brick and mortar storefronts. 20 locations and 300+ employees were all managed from a NH based Management company owned and operated by William. That business was packaged up and sold to private equity out of NYC, leading the way for the formation of Lazy River Products Dracut.

Lazy River has been open and operating since Mar 2021 and has almost 2 full successful years of owning and operating, not only a Retail Cannabis Dispensary here in Mass but also a full Manufacturing Facility within the same building with 2 additional and separate licenses with the CCC.

Mark Leal – Director of Operations

After attending University, Mark accrued 20+ years of experience working in technology as a Management Team lead. Mark's experience working in Executive Management coupled with his data and facility security experience puts him in a unique position to help run, oversee and secure Retail Operations and Production. Mark is going to play a pivotal role ensuring the day-to-day Retail Operations are running accordingly and that the entire Lazy River Products Company is upholding itself to the highest operational standards possible.

Mark's expertise and experience will guarantee Lazy River Products and its team members remain an example of how Licensed Marijuana Establishments should be run, maintained and secured.

Kevin Platt – Director of Horticulture and Cultivation Operations

Kevin has 20 +years of experience in marijuana cultivation procedures, product development, and cultivation management. Kevin has worked in California, Hawaii, and Maine over this time perfecting his craft and art. Kevin has worked with some of the leading people in their respective markets to develop the highest quality, craft cannabis in those markets. Currently, Kevin is one of the leading Cultivators in the state of Maine.

Kevin was hired initially by his former employer to set up and manage their current cultivation site, operating in the Portland area. Under Kevin's guidance, the operation significantly increased the amount of high quality product for their patients, as permitted by the State of Maine. Under Kevin's tutelage they have become one of the leading caregivers in all of Maine, certainly in Portland.

Extensive Back Office Operations

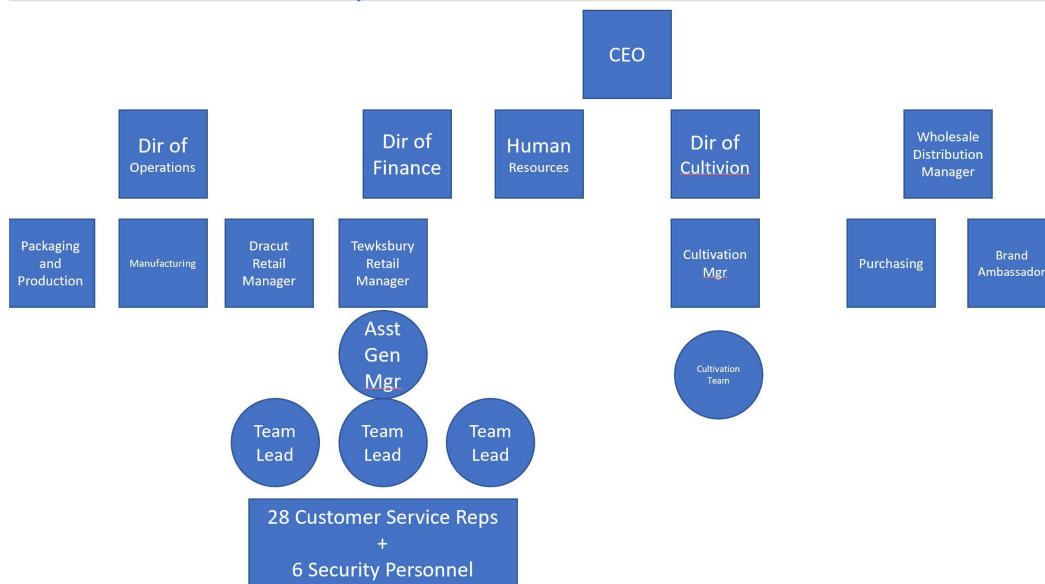
Lazy River Products has a number of other talented individuals on its Management Team to include HR, Legal, Compliance, Inventory, Purchasing, Wholesale and Finance. This is the seasoned support network that is already in place and has been functioning flawlessly for close to 2 years at this point.

One of the largest factors differentiating Lazy River Products from most of the other applicants is we we have an immensely successful, existing location not far away, in a similar market. As an organization, we are concentrating our presence on the Greater Lowell Area. Our goal is NOT to be spread out all over the State. That is what our wholesale program is for. We want our retail presence here in the Greater Lowell Area.

We also control our own supply chain. This is critical as we are all finding out in our current economic situation. In cannabis specifically this just ensures no matter what may happen with regards to available product, we will ALWAYS have our own products to supply our presence in Tewksbury. Nothing can disrupt that since we cultivate, have a full lab for product manufacturing and a full kitchen for our edible program. almost all of your other applicants rely on the supply chain to be in business. Few manufacture their own products.

Tewksbury will be an excellent compliment to our growth strategy. This strategy is built on functional partnerships with select municipalities in our target markets and ease of management and support locally from the local and already established, Lazy River Products resources.

Organizational Hierarchy Chart



Personnel

When hiring, Lazy River Products will seek out diverse, skilled applicants that are not just qualified and experienced but also those that share Lazy River Products' vision, work ethic and values. All of the Lazy River Products' team members will strive to provide the highest quality products, experience and education to all our valued customers. Each employee will have a deep understanding of what we sell and the process it took for that product to get to the sales floor. They will be more than capable to provide an education to the novice user or engaging with a seasoned cannabis connoisseur.

Lazy River Products' employees will benefit from the company's dedication to excellence. Lazy River Products is committed to ensuring our employees obtain an intimate knowledge of the cannabis plant as well as expertise on product and public safety. Employee production and performance based incentives will be made available to all Lazy River Products Employees that qualify and excel in areas such as teamwork, high productivity and exceptional customer service.

Administrative Personnel

(Excludes Lab, Kitchen and Cultivation Personnel in Dracut but does include Administrative positions that would affect and support Tewksbury's Retail Operation)

Chief Executive Officer – CEO

- Responsible for providing direction for the business
- Creates, communicates and implements the organization's vision, mission, and overall direction leading the development and implementation of the overall organization's strategy
- Responsible for setting and changing prices and creating promotions, sales and specials
- Responsible for employee recruitment
- Responsible for payment of salaries
- Responsible for signing checks and documents on behalf of the company
- Evaluates the success of the organization

Dir of Operations

- Oversees construction projects through approvals of equipment, construction and budgets
- Oversees the retail and cultivation operations through reporting from facility management team
- Oversees the human resources department with direct influence on growing the staff and maintaining human resources
- Coordinates the development and implementation of the staff on-boarding process to ensure the company mission, values and culture are conveyed with each new hire
- Responsible for community outreach through support of non-profit enterprises
- Creates promotional strategies for reaching new customers and demographics

Director of Finance

- Provide positive financial leadership to all staff in partnership with President
- Serve as a member of the management team; participating in key decisions pertaining to strategic initiatives, operating model and operational execution; assess organizational performance against both the annual budget and long-term strategy
- Oversee financial and accounting operations, including general accounting, payroll, accounts payable, accounts receivable, deposits, bank reconciliations, account systems and databases used
- Prepare and present financial analysis and reports to senior management
- Assist independent auditor in performing the annual audit and ensure compliance to key regulatory and government requirements
- Establish internal control procedures, monitor compliance, and devise policies, procedures and documentation to provide guidelines for accounting/finance/administrative staff
- Oversee budgeting, including preparing the annual budget for the entire organization

Director of Human Resources

- Oversees a talented Sales and Production Team, while shaping, establishing, and fortifying scalable processes designed for rapid growth
- Oversees and direct day-to-day operations in conjunction with the COO and shared initiatives
- Drives performance management, as an advocate of company culture, values and behavior
- Supports all logistics activities, providing the analytical tools necessary for data driven decision making
- Assisst in continual development of department and companywide business strategies, pioneering efficiencies and sustainable growth practices

Director of Marketing

- Oversees a talented Sales and Production Team, while shaping, establishing, and fortifying scalable processes designed for rapid growth
- Oversees and direct day-to-day operations in conjunction with the COO and shared initiatives
- Drives performance management, as an advocate of company culture, values and behavior
- Supports all logistics activities, providing the analytical tools necessary for data driven decision making
- Assists in continual development of department and companywide business strategies, pioneering efficiencies and sustainable growth practices

Marketing Coordinator

- Develops and manages project plans for on-time delivery of marketing activities.
- Creates success metrics, track progress, and modify plans as needed.
- Maintains knowledge of the latest developments in social/digital/advertising/analytical trends and platforms with an eye toward incorporating new ideas and emerging tools to further advance our Company's presence.
- Oversees and manage marketing agency partners and ensure messaging is unified.
- Digital marketing activities including:
- Lead email marketing campaigns and messaging with targeted audience.
- Search Engine Optimization (SEO) support and analysis.
- Write and facilitate social media posts on LinkedIn, Twitter, Instagram, and Facebook.
- Content generation
- Facilitates, supports, and executes writing articles, bylines, blogs, award submissions, abstracts, and new marketing content.
- Supports LRP's Community Initiatives and State Industry Requirements regarding positive impact planning

HR Coordinator

- Performs a variety of administrative and clerical tasks. Ordering and maintenance of office supplies. Set up and manage paper and electronic filing systems
- Responsibilities for new hire/renewal of agent registrations. Helps to oversee the onboarding process, including new hire orientation and ensure that all employee paperwork is received in a timely manner and checked for accuracy. Maintain employee personnel files
- Processing mail and organizing AR/AP. Scan and fax invoices and receipts
- Helps to administer benefits programs such as health and dental insurance, PTO, sick time, and sick leave. Provide information and administer all requests for leave of absences
- With Management's help, investigate employee complaints, concerns, and

potential misconduct and help to institute the appropriate resolutions with said employee relation issues

- Assists in maintaining compliance with federal, state, and local employment laws and regulations
- Assists in filling out employee time sheets, reviewing employee hours, and submitting documents for payroll. Processing payroll in Resourcing Edge
- Compiles and analyze statistical reports as needed by management
- Assists with vendor relations for new store/building opening
- Helps to provide general HR support for staff

Sr Accountant

- Responsible for assisting with month-end close procedures which include balance sheet reconciliations, ad-hoc analyses, trial balance reviews, and financial statement preparation, while adhering to tight deadlines
- In accordance with LRP's closing schedule, assist in the issuance of timely, accurate and complete financial statements in accordance with US Generally Accepted Accounting Principles
- Is responsible for reviewing general ledger activity across all lines of business
- Improve account reconciliation process, drives deadlines and enhances deliverables as they pertain to the month-end close and financial statement preparation process
- Provides technical accounting advice and knowledge to others in LRP, including on any contracts into which LRP may enter
- Ensures internal processes and procedures are compliant with State, Federal and other governing agency controls (CCC)
- Develops, enhance, and maintain LRP Standard Operating Procedures relating to internal accounting and bookkeeping processes and best practices
- Maintains the charts of accounts and an orderly paper and paperless accounting filing systems.
- Coordinates the preparation of the Executive Management reporting package each month, including performance and cause of change analyses to the established Annual operating plans and forecasts
- Assists in the completion of annual financial statement audit
- Provides historical information, as needed, for capital investments, pricing decisions, and contract negotiations
- Coordinates the provision of information to external auditors for the annual audit and external tax preparers for corporate tax returns
- Assists LRP team with budget and forecasting processes

Regional Manager

- Reviews and analyzes regional sales, payroll allocation, product selection and operational records and reports; uses data to project sales, determine profitability and adjust according to company goals
- Hires and trains store managers
- Organizes and oversees the schedules and performance of store managers
- Conducts performance evaluations that are timely and constructive
- Provides leadership to the assigned region and mentors all store level leadership teams
- Conducts compliance reviews in conjunction with compliance manager to ensure that stores are operating in compliance with appropriate rules and regulations
- Ensures that each location is meeting the brand standards regarding customer experience
- Collaborates with store managers to develop sales goals for each location, monitors progress toward those goals, and develops strategies to attract and retain customers
- Identifies opportunities for improvement in the store region; designs and implements training, strategies, policies, goals, and other resources to maximize productivity and morale
- Assists with developing training modules and career paths for store level positions
- Schedules and directs regular meetings and events to share information, set and revise goals, and to increase morale
- Collaborates with executive leadership to develop territories, sales quotas, and strategies
- Prepares and implements district-wide budget; monitors and approves expenses
- Maintains knowledge of market, competition, and best practices and trends in sales techniques and strategies
- Handles discipline and termination of employees in accordance with company policy

Facility Manager – Tewksbury

- Establishes an organizational service culture and team providing great products, great finance, and great service.
- Inspires staff, co-workers and vendors to develop, document and implement plans to meet company objectives and goals
- Creates an environment that surrounds all who encounter the facility with great products, great energy and great experiences.
- Knows many customers/patient/caregivers and solicits constant feedback.
- Reviews systems and processes regularly customer experience, efficiencies, and profitability in mind.
- Provides opportunity for growth and advancement to the staff.
- Is proactive and improve on areas needing improvement in a timely manner
- Builds long-term relationships with our customers and community.
- Establishes positive working relationships with our suppliers, both internally and externally.

- Builds connections to other businesses who share similar values.
- Establishes mechanisms that celebrate group achievement and recognize individual success.
- Actively educate our customers/patients/caregivers, staff on our products, business, and the industry.
- Actively educate ourselves on all aspects of the company jobs.
- Ensures effective implementation and adherence to business guiding principles and methodologies

CSR – Team Leads

- Participates in refining and implementing best operational rules, regulations, policies, and procedures
- Assists in training and directing the dispensary team
- Inspires the team to deliver the best customer experience
- Educates the team according to company guidelines, conduct performance reviews, and establish performance improvement plans
- Educates the Team about cannabis products and consumption methods
- Ensures the safety and satisfaction of both customers and employees
- Maintains an in-depth industry wide knowledge of products and strains in Massachusetts. Maintain in-depth knowledge of the current cannabis law and regulations
- Oversees and assist with quality product inventory
- Conducts opening/closing inventory counts, and audits as required
- Assists in managing financial records and cash handling procedures as required
- Ensures
- the dispensary remains compliant with security, inventory and local and state regulations including effectively leading state inspectors through the facility
- Assists maintaining records for all necessary documents: delivery and inventory manifests, inventory counts, necessary employee and patient/customer information, destruction reports, etc

Security

- Maintains internal and perimeter store security
- Inspects and patrols premises regularly
- Monitors all access and egress points on the property
- Authorizes entrance of staff and customers
- Monitors surveillance cameras
- Responding to alarms in a compliant and timely manner
- Acts as Emergency Response point of contact for local police, fire, EMT
- Provides assistance to staff/customers in need
- Promptly reports any suspicious behaviors or activities

CSR's

- Records, arranges, and packages patient orders.
- Maintains an organized environment and facility appearance.
- Provides consistent exceptional service for new and existing customers
- Controls all Point of sale system entry
- Responds to customer requests for information in a patient and informative way
- Maintains a basic understanding of the products available within the retail location
- Be able to follow best practices established by the store for customer engagement and compliance
- Projects a positive image of the organization to employees, customers, industry, and community.
- Builds long term relationships with customers for referrals and repeat business

SWOT Analysis

Lazy River Products takes an analytical approach to planning, launching and operating its business. Its SWOT analysis identifies the items Lazy River Products plans to navigate while executing its business plan.

Strengths <ul style="list-style-type: none">• A Robust and dynamic team<ul style="list-style-type: none">○ Professional and experienced leadership○ Industry leading strategic partners• Tested, reliable, and scalable cultivation design and systems• Exceptional location• Local municipal and community support• Prime location	Weaknesses <ul style="list-style-type: none">• Inexperience with scaling a marijuana operation to degree proposed• Initial outsourcing of edible production
Opportunities <ul style="list-style-type: none">• To build a brand hailed by the Commonwealth, the Commission, customers and competitors• Capitalizing on early shortages and high market prices• To build a diverse, empowered and local workforce• Creating a vertically integrated company that maximizes tax advantages when possible• To position LRP for potential future acquisition	Threats <ul style="list-style-type: none">• Future changes to local and state-wide regulations• The negative stigma and historical implications of marijuana• Competition

Market Analysis and Competition

Customer Demographics

Population

Lazy River Products understands that population and demographics play a key role in any retail store's success and believe that its dispensary will be no different. Lazy River Products assumes its target market to be the 184,825 reachable and accessible population in and surrounding its location at 553 Main St. This encapsulates the households within a 5 mile ring around the facilities address. Although people will be traveling further than a 5 mile ring to seek out Lazy River Products in house product line, some items of which will only be made available through our retail stores.

Description	1 Miles	3 Miles	5 Miles
DEMOGRAPHIC OVERVIEW			
Population	6,489	53,608	184,825
Households	2,438	19,748	66,387
Total Household Income (\$)	250,293,032	1,828,668,376	5,856,287,804
Median Household Income (\$)	90,472	75,843	71,433
Median Age	43.3	38.8	36.7
POPULATION BY RACE			
White Population	5,982	44,019	138,857
Black Population	88	1,823	7,644
Asian, Pacific Islander Population	304	4,274	24,028
American Indian and Alaska Native Population	1	87	357
Other Race Population	36	2,247	9,312
Two or More Races Population	78	1,158	4,627
POPULATION BY ETHNICITY			
Hispanic Population	119	4,636	19,264
White Non-Hispanic	5,909	41,606	130,049
BLOCK GROUP COUNT	3	36	130

Of this population, Lazy River Products can use historical data and research to refine its target audience within this population, with the goal of maximizing marketing effectiveness and accurately projecting product mix.

Market Studies

In May of 2017 a study was performed by the Cannabis Consumers Coalition out of Denver, CO. In this study to better understand the customer demographics of marijuana consumers, researchers found that the typical customer is more likely to be female than male, be 21-35 years of age, work as a “professional” and likely to spend at least \$200+ a month on cannabis.

The exact breakdown of respondents was as follows:

- Ages 21-35 made up 40.79% of the respondents
- Ages 30-45 made up 25.75% of the respondents
- Ages 46-55 made up 16.17% of the respondents
- Ages 56-65 made up 12.59% of the respondents

In this study, 58.27% of cannabis users were between the ages of 36 and 45 years, with 32.52% of cannabis users being over the age of 45.

Of the respondents, 42% spent more than \$200 or more a month on personal consumption of marijuana. 21.14% of those people spent \$300 or more a month.

The study found that 27.46% of the cannabis consumers have combined household incomes of over \$75,000 showing that cannabis consumers are professional, countering the negative stereotypes that cannabis consumers are lazy and unmotivated individuals.

Furthermore, Lazy River Products analyzed a June 2018 study conducted by the Department of Health in Massachusetts entitled “Marijuana Baseline Health Study Report of Findings” describing the patterns of use, methods of consumption and general perceptions of marijuana, among other areas of interest. This report can help us understand more as to who is likely to purchase Lazy River Products. This recent study reported that combusting dry flower was the most popular method of administration, followed by vaporizing concentrate and eating marijuana infused products.

Unlike the Cannabis Consumers Coalition study in Colorado, the DPH study reports that 21% adults in Massachusetts have used marijuana in the past 30 days; 26% of men and 17% of women. This study also found that the proportion of usage was higher in younger adults than older, with 54.4% of those 18-20 years old and 49.1% of those 21-25 years old.

Customer Loyalty

Lazy River Products will depend largely on its loyal, local customers. Historically, dispensaries have seen close to 80% of retail revenue derived from 20% of its customers. Lazy River Products

intends to run product promotions, local marketing tactics, surveys and loyalty benefits to ensure retention of its most loyal customers.

Lazy River Products uses its scientific approach and excellence in production to create the best craft cannabis that its loyal consumers demand, helping to bring them back multiple times. To its loyal customers, Lazy River Products' marijuana and marijuana products will speak for themselves, allowing other marketing efforts to focus on new customer acquisition.

Competition

Lazy River Products is aware of the increasing competition in Massachusetts as companies rush to enter the emerging industry. However, it is Lazy River Products' belief that in business, competition is good, and the company intends to use this to its advantage.

In the area surrounding Tewksbury, there is only a limited number of retail licenses being issued and only a few existing Registered Medical Dispensary (RMD) in the bordering cities, who have also granted a provisional license for adult use sales.

Although the company anticipates more applicants in the area, company calculations indicate there is ample demand in the area to support multiple dispensaries. Additionally, Lazy River Products anticipates new prospective customers to be awakened by the new availability of dispensary outlets in this area of the state. For reasons stated, Lazy River Products is well positioned to emerge as a top choice for consumers seeking options in the area.

Timeline

Company Preparation and Licensing	Duration	Completion
Secure Municipality Approvals	Awaiting Approval	Dec 31st, 2022
Prepare for CCC Application	Being Done Now	Jan 1st, 2023
Develop SOP's	Already Done	January 2023
Submit Application	1 Week	January 2023
Receive Provisional License	3 Months	April 2023
Infrastructure		
Design Infrastructure	Started	April 2023
Engage Contractors	Already Engaged	April 2023
Complete Architectural Review	1 Month	May 2023
Build Out Dispensary	3 Months	June 2023
Receive Final License Approval	1 Month	Oct 2023
Start Up		
Execute Hiring Plan	1 Month	Nov 2023
Implement SOP's	1 Month	Nov 2023
Execute Marketing Plan	1 Month	Nov 2023
Begin Sales		End of Nov 2023

Retail

Lazy River Products' Retail Storefront will be a state of the art dispensary combining aesthetics with functionality and security. Located at 553 Main St, unit 2 in Tewksbury, this 8,700 square foot Retail Dispensary will rival the cleanest, most well organized big box retailers in business today. Construction on the Retail Space could begin as early as the end of Q1 or Q2 of 2023 or earlier with Tewksbury's approval.

Lazy River Products has a branding strategy and all of its retail locations will all preserve the same look and feel. LRP's Architectural and Design Team are some of the best in Retail and only use the highest quality materials in Lazy River Retail Facilities.

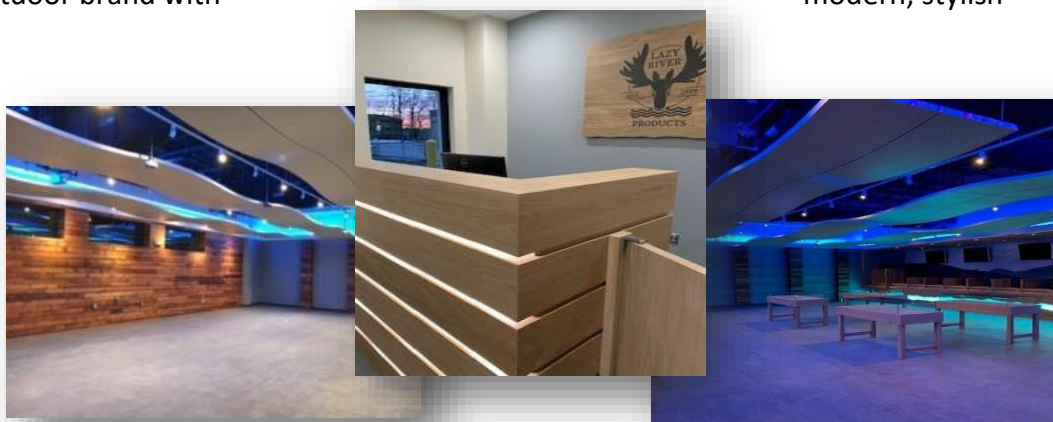
As the proverbial face of the company, the retail dispensary will incorporate a contemporary, brand themed lobby to give the best experience to Lazy River Product customers. The Lazy River Product dispensary will be safe and secure implementing strict security measures and state of the art security systems to ensure dispensary processes occur without issues.

Dispensary Design

Lazy River Products aims to create a unique feel to their dispensary, combining a sleek, contemporary Apple Store aura with the Lazy River Products, outdoor focused theme. Put together, Lazy River Products can administer a warm and consumer friendly atmosphere that helps distinguish and maximize the Lazy River Products customer experience.

The Lazy River Products dispensary will incorporate the Lazy River Products brand by outfitting the interior with reclaimed wood. The ceilings will be 12-15 feet high, reinforcing the openness of the great outdoors that also allows the customer to feel more comfortable. The river seen in the Lazy River Products logo will be incorporated into the dispensary design in the form of indoor water features, adding to a soothing ambiance.

The dispensary aims not to bring only the great outdoors inside, but to also combine the outdoor brand with modern, stylish twist.



“Nature Meets a Touch Of Modern”

Security Systems

State of the art security systems will be in place at the Lazy River Product dispensary. Security features will include soundless panic alarms, high definition cameras, a professionally trained security staff and more to ensure the safety and security of Lazy River Product customers, employees, and product.

Equipment:

- State of the Art Vault with Fireproof Walls
- Panic Alarm (Hold-Up) Devices
- Wall Strobes
- 360 Degree Cameras
- Video Surveillance Systems

- Video Recording Systems
- Video Management Systems
- Electronic Access Control Systems (Card Access)
- Request to Exit Motion Detectors
- UPS Battery Back-Up Systems
- Access Control Power Supply
- Water Sensors
- Glass Break Detectors

Process

Although Lazy River Products is fully integrated and capable of supplying its own products into its own retail dispensaries, it will also offer a variety of other boutique, craft quality products from other manufacturers and wholesalers. We will be shipping and receiving our own products into the proposed Tewksbury location, as well as products from other providers. There is a very specific process involved in the shipping of and the receipt of Cannabis and Cannabis Products.

At the dispensary, products are counted and logged before being accepted into the facility, ensuring no diversion occurred during transportation. Once confirmed and accepted, the product moves into the secure safe. Inside the Lazy River Products dispensary safe is ample storage for product including refrigeration storage for designated infused edibles ensuring quality is maintained. Using first-in-first-out processes, marijuana products are rotated into front storage, accessible only to dispensary employees. Lazy River employees take product from front storage when their direct supply is low.

At the Lazy River Products dispensary, customers will enter through the main entrance before being greeted by a Lazy River Products employee at the front desk who checks identifications, ensuring nobody younger than 21 is permitted into the dispensary.

Once past the front desk, customers walk into the lobby where they may enter a queue to receive individualized attention from a Lazy River Products employee behind the counter. Customers may also walk around the lobby viewing products on display, reading educational material or perusing ancillary products such as grinders and personal smell-proof containers.

Once in the queue at in front of a Lazy River Products employee, customers request the marijuana product(s) desired. Lazy River Products' dispensary employees are trained to conduct all business matters with customers in a polite and respectful way while using opportunities to cross-sell products to the customer. Once the transaction is completed, the employee thanks the customer for coming in before they depart. Customers exit the dispensary through the same way they entered.

Lazy River Products will also offer Online Ordering and Pick Up.

Future Growth

Lazy River Products aims to open one additional Retail Storefront in a municipality yet to be determined. This will take place after the launch of the new Tewksbury, MA dispensary and will complete the companies Retail growth within Massachusetts.

Products

Lazy River Products will sell its own line of branded products as well as some very specialized provider's products. Here is an idea of the types of products you can expect to see for sale in Lazy River Products Malden location; flower, pre rolls, vape carts, a variety of concentrates and edibles. Concentrates would encapsulate items such as; wax, sugar, budder, sauce, diamonds, Resin, Live Resin, Rosin, Live Rosin and more. Edibles would include items such as gummies, chocolates, hard candies and confectionaries.

Creating the Craft

Due to the increasing demand for Massachusetts marijuana, there is and will be a continued rush to push supply. Naturally, businesses will get caught up in filling that demand by rushing processes to speed up production and increase yields. Lackluster techniques such as improper curing, auto trimming and rushed harvesting will all contribute to a product lacking in quality.

Lazy River Products is dedicated to only produce and sell meticulously cultivated cannabis and will initially only trim by hand. Technological advances like automated trimmers can create efficiency but will only be implemented so long as they don't take away from the quality of Lazy River Products' flower.

Our handcrafted techniques and devotion to our product is what makes Lazy River Products a unique and promising company at the forefront of cannabis in Massachusetts. From our premier quality products to our exceptional service to our customers and our community, we are the new definition of excellence in craft marijuana.

"Give Back, Grow, Succeed"



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February 2, 2024

Lazy River Products – Tewksbury, LLC
553 Main St Unit 2
Tewksbury MA 01876

Dear William,

Please accept this letter as evidence of our plan to place insurance coverage for your Tewksbury location and our intention to continue to provide this and to provide similar coverage for any future business locations.

The policy to be obtained will include general liability and product liability insurance coverage of no less than \$1 million per occurrence and \$2 million in aggregate annually. The deductible for each policy will be no higher than \$5,000 per occurrence.

Thank you,



Janet M. Scott-Buckley
Gilbert Insurance Agency Inc.



CONFIDENTIAL – EXEMPTED FROM PUBLIC RECORDS PER G.L. c. 4, § 7(26)(n)

Restricting Access to Ages 21 and Older

In alignment with the emphasis placed on restricting the accessibility of Marijuana Establishments to qualified individuals aged 21 years and older, Lazy River Products (“LRP”) has policies and procedures in place to meet and/or exceed the requirements set by the Commission. Pursuant to 935 CMR 500.050(8)(b), the LRP retail facility will only be accessible to individuals 21 years of age or older with a verified and valid, government-issued photo ID. Upon entry to the LRP facility premises, an LRP agent will immediately inspect and scan the individual’s proof of identification and determine the individual’s age using an age verifying software ID scanner, in accordance with 935 CMR 500.140(2)(a). In accordance with 935 CMR 500.140(2)(b), a customer’s identification will also be verified by an LRP agent a second time at the front desk as well as a third time at POS terminal checkout. Individuals who cannot provide a valid, government-issued photo ID will be denied access into the facility.

Main Entrance Check-In Duties

It is company policy to have at least one Security agent present at the retail main entrance where the customer’s ID will be verified the first time. Customers will then enter the retail facility lobby and will proceed to the front desk. This is where customer’s ID will be verified a second time before entering the retail dispensary.

- All customer IDs must be unexpired and there are no exceptions made regarding accepted photo IDs. Forms of valid, unexpired, government-issued photo IDs accepted by LRP are:
 - Driver’s License
 - Government-Issued ID Card
 - Military ID card
 - Passport or Passport ID Card

In accordance with 935 CMR 500.030, all LRP employees and agents will be 21 years of age or older. LRP agents will not be required to enter and check-in through the retail main entrance. LRP agents will have their own dedicated employee entrance on the west side of the facility. Here, there will be an employee security check-in where the arriving LRP agent will provide her/his government issued ID and LRP credentials. Once confirmed, the LRP agent may enter the locker rooms and proceed with their daily duties. If the individual requesting access is a contractor or visitor with a reasonable need to visit (inspections, repairs, etc.), they must follow the LRP procedure for Contractor/Visitor access. Those individuals must first register in the company guest log and present their valid government-issued photo ID as well as their Company ID. Once verified, they will be provided with a visitor badge and security personnel will escort said guests/vendors to their destination where they will be supervised at all times. Once said task is complete those individuals will be escorted through the same entrance point on the west side of the building that they entered through and only after returning their Guest Pass and logging out of the guest log.

Notwithstanding the foregoing, at no time shall any contractors/visitors be permitted to enter Limited Access Areas or any areas of the facility containing marijuana or marijuana products unless they have first obtained a Visitor ID badge and are escorted at all times by an LRP agent who is otherwise authorized to enter the Limited Access Area. In accordance with 935 CMR 500.110(4)(c), access to Limited Access Areas in LRP’s facility shall be restricted to employees, agents or volunteers specifically permitted by LRP, agents of the Commission,



Commission Delegees, and state and local Law Enforcement Authorities acting within their lawful jurisdictions, police and fire departments, and emergency medical services acting in the course of their official capacity.

General Accessibility

LRP will remain compliant with accessibility rules outlined by the Commission in 935 CMR 500.110. with a heightened focus on the restriction of access to those under the age of 21 years. All emergency exits and access points are secure and locked during both operating and non-operating hours with cameras angled to properly monitor those areas. LRP security specifics, such as the facility's alarm and surveillance systems, can be found within the Security Plan document within the relevant application section.

Customer Data

LRP will not acquire or record consumer personal information other than information typically required in a retail transaction, which may include identifying information to determine the particular consumer's age. In accordance with 935 CMR 500.140(2)(d), LRP will not record or retain any personal information from a consumer without the consumer's voluntary written permission.

COVID NOTICE: *Due to the outbreak of COVID-19, our business is taking extra precautions for the care of every employee to include enhanced sanitation/disinfecting procedures and full PPE in compliance with CDC guidelines. For updates through this pandemic please refer to the CDC and MA Department of Public Health guidelines, as applicable.*



Record Keeping Procedures

Lazy River Products (“LRP”) maintains various records associated with business activities that need to be properly kept for future reference. Records maintained by LRP will be made available to the Cannabis Control Commission (“CCC” or “Commission”), upon request. When possible, records are retained electronically and saved redundantly to avoid total loss. Following the potential closure of the prospective LRP retail facility, all records will be kept for at least 2 years at the expense of LRP in a form and location acceptable to the Commission in accordance with 935 CMR 500.105(9)(g). Types of records include all records required in any section of 935 CMR 500.000 in addition to the records outlined in 935 CMR 500.105(9):

1. **Financial Records:** Maintained in accordance with generally accepted accounting principles (“GAAP”) and kept electronically. Financial business records will include, but not be limited to assets and liabilities, monetary transactions, books of accounts, sales records, salaries and wages and additional records outlined in 935 CMR 500.105 (9)(e). For additional information, including policies and procedures related to financial records, see the LRP Maintenance of Financial Records document.
2. **Personnel Records:** Maintained electronically and for at least 12 months after an employee is terminated. Personnel records will contain all the information outlined in 935 CMR 500.105(9)(d). These shall include at least the following categories of information: 1) Job descriptions for each agent; 2) A personnel record for each agent; 3) A staffing plan that will demonstrate accessible business hours and safe cultivation conditions; 4) Personnel policies and procedures; and 5) All background check reports obtained in accordance with 935 CMR 500.030. LRP will also maintain records of responsible vendor training program compliance for four years and make them available to inspection by the Commission or any other applicable licensing authority upon request during normal business hours. After an employee is hired by LRP, a personnel file will be created containing information such as their resume, application, copy of government issued license, emergency contacts, and other details as specified by the Commission. Employee records will be updated by administrative employees as necessary with information such as documentation of completion of required training and disciplinary actions. For more information on LRP’s personnel policies, see the Policies and Procedures Including Background Checks document.
3. **Trainings:** Maintained electronically, LRP will maintain records of Responsible Vendor Training program compliance for four years. LRP agents will complete other trainings as part of their required eight hours of on-going training annually and LRP may keep records of these trainings, along with an employee’s personnel records.
4. **Contracts:** Maintained electronically and in hard-copy format. Contracts are retained indefinitely or until deemed unnecessary. From inception, LRP will create a file, physical or virtual, that will contain all contracts LRP has with other companies. Contracts will be added once signed and will remain indefinitely in the database.
5. **Written Operating Procedures:** As required by 935 CMR 500.105(1) and maintained electronically. The Company expects these documents to evolve with the business; therefore, they are retained and updated into perpetuity. Written Operating Procedures are housed in a database that employees have limited access to.
6. **Inventory Records:** Maintained electronically via the state appointed cannabis tracking system. Detailed inventory records are maintained as required by 935 CMR 500.105(8)(d). Every inventory record will include, at minimum, the date of inventory, a summary of inventory findings, and the names, signatures



and titles of those who conducted the inventory. Summarized inventory detail is maintained in accordance with financial record standards. If inventory records were taken by use of an oral recording device, they are promptly transcribed in accordance with 935 CMR 500.105(8)(c)(4). For additional inventory policies and procedures, see the Inventory Procedures document.

7. **Security Records:** LRP will maintain and keep all 24-hour recordings from all video cameras for at least 90 calendar days that will be made immediately available to the Commission upon request LRP will also maintain security maintenance check reports, visitor logs, and daily security walk-through reports. Recordings will not be destroyed or altered and will be retained as long as necessary if LRP is aware of a pending criminal, civil or administrative investigation or legal proceeding for which the recording may contain relevant information. All recordings will be maintained in a secure location to prevent theft, loss, destruction and alterations. For more information on the security system, security cameras, and other details specific to security, see the LRP Security Plan document.
8. **Transportation Records:** Maintained electronically or in hard-copy format, transportation records are any and all records not defined elsewhere in this document that include, but not limited to: manifest records, vehicle registration and inspection documentation, and drivers' licenses. For additional information on policies and procedures related to transportation, see the Transportation of Marijuana document.
9. **Waste Disposal Records:** Maintained either in hard-copy format or electronically as required under 935 CMR 500.105(12), waste disposal records will include, at minimum, the date, type and quantity disposed or handled, the manner of the disposal or other handling, the location and the names of the LRP agents present with their signatures. Logs associated with waste are readily available with 90 days of data, at which time they are transferred into archive via limited-access filing cabinet. Archived data is maintained for 3 years. Waste disposal procedures can be found in the LRP Quality Control and Testing document and the LRP Storage document.
10. **Maintenance Records:** Maintained in electronic and hard-copy format. Work orders associated with building or equipment maintenance are retained for 3 years.
11. **Visitor Logs:** Maintained in electronic and hard-copy format. Visitor logs are retained for 3 years.
12. **Seed-to-Sale Tracking Records:** Tracking records for all marijuana products as required by 935 CMR 500.105(8)(e). LRP shall use the Commission-approved METRC seed-to-sale tracking system.
13. **Incident Reporting:** LRP will notify appropriate law enforcement authorities and the Commission of any breach of security or reportable incident immediately and, in no event, more than 24 hours following discovery of the breach of security or reportable incident. LRP shall notify the Commission and local law enforcement after all serious events including, but not be limited to, the occasions listed in 935 CMR 500.110(9)(a).

Confidentiality

LRP will maintain a high level of confidentiality in all aspects of business operations, only allowing accessibility to those who are authorized. This policy is maintained throughout the entire company and not only applicable to records and recordkeeping. All records will be kept confidential through an electronic safeguard system, including a network firewall. All equipment will be monitored for accuracy and efficiency monthly, using a third-party specialized vendor. Credentials will be verified by the Human Resources Manager. Network health reports will be communicated monthly to the LRP Management for review.



Visitor Record Keeping

Any individual seeking access to an LRP Marijuana Establishment must have a reasonable need for access. Before being admitted into the facility, the visitor must receive a visitor identification badge. Visitors receive a badge after being positively identified by security as being at least 21 years old. Security personnel will check visitors from their station at the security desk immediately behind the main entrance to the facility, noting the visitors name, arrival time, and purpose of visit in the Visitor Log. Visitors must also have their visitor badge visibly displayed at all times throughout their visit. Upon the departure of the visitor, the Visitor Log will be updated with the time they left and any relevant notes. Additional details on visitor/non-consumer access can be found in the Security Plan document of this application.

Inventory Counts

LRP will have the General Manager who monitors inventory and assumes the most responsibility regarding inventory records. One of these responsibilities is to conduct a monthly audit of the facilities inventory. There will also be a daily inventory count conducted at the beginning and end of each business day. All inventory counts include, at minimum, the date, summary of inventory findings, and the names, signatures and titles of the individuals who conducted the count. If there are any discrepancies, the General Manager is notified, and a discrepancy count is carried out. If, after the discrepancy count, the cause discrepancy isn't identified or is identified to be from diversion, the appropriate steps are taken by LRP staff and the Commission and appropriate law enforcement authorities are notified in accordance with 935 CMR 500.105(9).

SOP Housing

Written standard operating procedures (SOPs), training modules and other related documents such as the Employee Handbook, live in a centralized, electronic database, available to all Company employees. These materials are reviewed at least once a year by the General Manager and Human Resources Manager. Through the database, employees are able to review applicable operating procedures and improve their skills. The database is secure and allows for confidentiality of in-house policies and procedures.

Recording Diversion, Theft, and Loss

Upon a breach of security or other reportable incident as outlined by 935 CMR 500.110(9)(a) the Commission and law enforcement authorities are notified immediately and, in any event, no later than 24 hours after discovery of the breach of security or reportable incident. LRP staff will fill out an incident report for breaches of security along with any other events deemed appropriate by management. Agents who witnessed, discovered, encountered or were otherwise involved in the incident, will be required to provide details to be included in the incident report. For every incident, the Security Manager also fills out the Security Manager incident report and both are filed and stored in a secure manner. All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(9)(a), including any incident reports created and provided to the Commission pursuant to 935 CMR 500.110(9)(c), shall be maintained by a Marijuana Establishment for not 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 their lawful jurisdiction.



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Maintaining of Financial Records

Lazy River Products (“LRP”) maintains financial information on the accrual basis in accordance with Generally Accepted Accounting Principles (“GAAP”). LRP intends to allow as many standard forms of payment but understands the potential limitations associated with operating regarding cash intensive transactions. To ensure accuracy, security and data integrity, the Company utilizes several procedures:


1. **Recordkeeping:** LRP will maintain business records compliant with the regulations set forth in 935 CMR 500. These records along with any other records outlined in 935 CMR 500 will be made available to the Commission upon request. Business and financial records will be maintained in accordance with generally accepted accounting principles. Financial records maintained by LRP include but are not limited:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts which 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, stipends paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a LRP.

LRP uses QuickBooks to maintain accounting records. This system permits LRP to maintain and update transaction data such as Company purchases, inventory valuation revenue and payroll. QuickBooks is hosted via virtual private network through Right Networks. Data is stored online and is also backed up to a local, secure server daily. Supporting documentation for transactions is also stored locally on a secure server. System access is limited to certain authorized users on LRP’s executive management team and each authorized user has unique security credentials.

2. **Accounting Review:** LRP will engage with third-party accounting firms MFA Companies and Supporting Strategies to review annual financial reports for compliance with GAAP. The third-party accountant will also perform bank reconciliations once a month.
3. **Tax Records:** LRP will engage with MFA Companies and Supporting Strategies to prepare and file federal, state and other tax returns to ensure compliance.
4. **Closure Records:** If LRP’s facility closes, all records including business and financial records, will be maintained securely by LRP at the cost of LRP for a period of two years.





Handling Cash (Retail Only)

(Storage, Collection, Frequency, and Transport) At the end of every day, LRP staff will collect the cash from their respective registers and reconcile. After a successful reconciliation, the cash will be bundled together before given to a designated employee who will place the cash into a lockbox located within the locked safe. Only the General Manager and Controller have access to the safe and lockbox.  will get picked up by International Protective Services, Inc. (IPS) as a courier service, scheduled at the discretion of the General Manager and Controller. The courier will meet at the dispensary once a week (or more often as required) to drive and deposit money in an unmarked armored vehicle, making sure to randomize the route and remain in communication with the Controller, who will monitor the drop remotely.

Daily Cash and Debit Card Handling Process:

The following steps have been defined as it pertains to daily management of cash drawers and drops to the cash safe. This is also outlined in policy 'LRP_Employee_CashHandling_Policy'.

1. Checkout Associate (CA) assumes responsibility for a cash drawer for making change for customers paying with cash at the beginning of their shift.
2. Each drawer will be counted by the CA, in the presence of a team lead, at the beginning of each shift and will contain \$200 in cash.
3. All payments (no matter what form) will be entered into the POS system and a copy of the printed receipt will be attached to the customer exit bag. The option of emailing a copy of the receipt to the customer will also be  available.
4. During mid-shift if the cash drawer requires a cash drop, the CA will contact the Team Lead or Manager on duty for a cash pickup following the steps below:
 1. When cash drawer bill clip is level with the top of the drawer.
 2. The Team Lead or Manager on duty is then contacted for a cash pickup.
 3. The Team Lead or Manager on duty will then collect cash from the POS cash drawer and will put it into a secure deposit bag with a lock. The deposit bag will then get locked at the POS station.
 4. Team Lead or Manager on duty will carry the deposit bag back to the cash vault where it will be stored and remain locked until the end of the CA's shift.
5. At the end of the shift the CA shall:
 1. Printout a report from the POS station of daily transactions.
 2. Printout a report from the debit card transaction devices.
 3. Bring cash drawer over to open office 115 for drawer count down.
 4. This is when the Team Lead or Manager on duty will collect any mid-shift cash drop bags from the cash vault and will bring them for cash drawer count down.
 5. As part of this process the CA will use the balance sheet to countdown and tie out drawer and reconcile cash and debit card transactions.
 6. If the debit card transactions report does not match what's reported in the POS debit card transactions report then the CA will notify the Manager on duty. At this point the  discrepancy policy will be followed.
 7. After all discrepancies have been rectified then close-out procedures will proceed for POS and debit card terminal as listed below:
 1. Leaf Logix POS close-out.
 2. Debit Card terminal close-out.



Sales and POS System (Retail Only)

LRP will utilize Leaf Logix as its POS system. Leaf Logix will be utilized at the stationary terminals as well as the floating terminals used by Sales Associates. In accordance with 935 CMR 500.140(6)(c), LRP will never utilize software or other methods to manipulate or alter sales data. The POS system will be inspected monthly to determine no software or other methods to alter sales data have been implemented. LRP shall maintain records that it has performed this monthly analysis. If an inspection reveals that software has been installed or another method has been implemented to alter sales data, LRP will notify the Commission, cooperate with the Commission in any related investigations, and take any other actions directed by the Commission. LRP will also comply with 830 CMR 62C.25.1 regarding recordkeeping requirements. The POS system is enabled to separately account for marijuana and non-marijuana sales, and LRP agents are trained to appropriately separate marijuana and marijuana products sales from non-marijuana sales using the POS system. In accordance with 935 CMR 500.140(5)(g), the DOR and Commission may audit and examine LRP's POS system to ensure compliance with Massachusetts tax laws and 935 CMR 500 as necessary.

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Qualifications and Training

Training

Lazy River Products (“LRP”) will hire all employees on a 90-day probationary basis at first. During this probationary period, employees will complete a comprehensive training program and will be evaluated for suitability in a restricted-access environment. Training will be customized based on the role of the employee and will include, at minimum, a Responsible Vendor Training Program in accordance with 935 CMR 500.104(2)(b). LRP will maintain records of employee completion of the required responsible vendor training for no less than 4 years. In compliance with 935 CMR 500.105(2), LRP will ensure that, prior to performing any job functions, employees will learn the responsibilities of their position and how the position operates on a daily basis. A component of this part of training achieved through shadowing exercises. New hires will spend time observing their supervisors and current agents working the same role. New hires will be able to visually experience a regular day in this position and will be able to ask questions. LRP ensures that all hired staff will complete training prior to performing job functions. Training will be held on-site and will cover the following:

1. Health and Sanitation;
2. Legal Compliance;
3. Safety and Security;
4. Inventory Monitoring and Reporting/Recordkeeping;
5. Marijuana Product Education; and
6. Job Specific Roles.

Annual Training

Pursuant 935 CMR 500.105(2)(a), LRP requires that all its agents receive at least eight hours of on-going training annually. This training could cover a variety of topics ranging from updated laws and regulations to cannabis education. The General Manager is ultimately responsible for the topics covered in annual on-going training and is assisted by the Human Resources Manager who is ultimately responsible for ensuring all LRP agents complete the required annual training. LRP will utilize both internal and external experts and professionals in fostering on-going training. On-going training will be recorded and stored along with an individual’s personnel records.

Responsible Vendor Training

Within 90 days of hire, any LRP registered agent will have attended and successfully completed a responsible vendor program. Once all agents have successfully attended and completed a responsible vendor program, LRP will be designated as “responsible vendor”, a status LRP will maintain so long as operations continue. All new employees of LRP will also participate in a responsible vendor training program within their first 90 days of service to maintain LRP’s status as a responsible vendor. Once an agent has completed a responsible vendor training program, they must complete the program annually to ensure LRP maintains status as a responsible vendor. LRP will maintain records of Responsible Vendor Training compliance for at least 4 years. Administrative employees who do not handle or sell marijuana may take the Responsible Vendor program voluntarily.



Health and Sanitation

LRP will provide thorough training to all facility employees to mitigate potential sanitation or safety risks. An emphasis will be placed on the regular cleaning and sanitation of all areas where products and customers may be present.

Health and sanitation training will focus primarily on contamination prevention and employees will learn best practices for preventing contamination of marijuana products from biological contaminants (e.g. parasites, mold, bacteria), physical contaminants (e.g. dirt, dust, glass) and chemical contaminants (e.g. cleaning compounds, sanitizing agents, solvents). Training will primarily focus on the below topics:

1. Inventory inspections – Procedure for inspecting marijuana products for signs of damage (e.g. water damage), pests and expiration dates.
2. Cleaning and sanitizing – Procedures for:
 - a) regular cleaning of equipment, utensils and surfaces to protect against contamination; and
 - b) cleaning and sanitization of display cabinets, countertops and other service areas at the beginning and end of each shift, and throughout the day as needed.
3. Storage of chemicals – Procedures for identifying and storing chemicals, including cleaning compounds, sanitizing agents and solvents.
4. Handling of marijuana products – Protocol for proper sanitation and personal hygiene prior to handling any marijuana product.

Health and sanitation training will also include the protocol for handling, storing and disposing of marijuana waste. Additional details related to health and sanitation may be found in the Quality Control and Testing document.

Legal Compliance

Legal compliance training will educate employees on applicable laws regulations and Commission guidance (collectively, “Applicable Law”), particularly how Applicable Law informs the day-to-day operations of LRP’s facility. Training will cover:

1. Inventory tracking compliance;
2. Required labeling and packaging of marijuana products;
3. Daily purchasing limits;
4. Recordkeeping and confidentiality;
5. Prevention of illegal diversion of marijuana; and
6. Disposal of marijuana waste.

Employees will complete initial legal compliance training at new employee orientation and will receive additional training from time-to-time as necessary to track any relevant changes to Applicable Law.

Security

Each new employee shall undergo safety and security training before beginning work. As a part of the employee orientation process, all employees will be provided with a copy of the final security plan, as well as security and safety training. Security and safety training shall consist of examination and discussion of the security plan, premises orientation, emergency training, and situational training.

Initial employee safety and security training shall include:



1. Building orientation and access authority which shall include:
 - a) The proper use of employee's access badge for entry into the premises and main building entrance;
 - b) The proper use of employee's access badge for entry into employee's authorized access areas;
 - c) Facility standard business hours and protocol for entry and exit outside standard business hours;
 - d) The proper use of employee's agent card;
 - e) Employee's authorized entry and exit points;
 - f) Employee's locker; and
 - g) Restroom and sink facilities.
2. Measures and controls for the prevention of diversion, theft or loss of marijuana which shall include:
 - a) Necessity of keeping all Limited Access Areas always locked and secured;
 - b) Prohibited activities such as entrance into unauthorized access areas;
 - c) Awareness of video monitoring; and
 - d) Requirement to report any unusual activity, security concern, or loitering.
3. Procedures and instructions for responding to an emergency that will include:
 - a) Accident prevention training;
 - b) How to respond to an emergency;
 - c) Emergency service provider location;
 - d) Emergency service contact information;
 - e) Emergency first aid kit locations; and
 - f) Emergency exits and panic button locations.

Inventory Monitoring and Reporting

Inventory Monitoring and Reporting/Recordkeeping training will focus on making all employees proficient in LRP's inventory tracking and point of sale systems and protocols for recordkeeping. LRP will utilize the point of sale system training program and resources to provide hands-on, situational training to employees on the protocols and procedures required by the Inventory and Recordkeeping Plans. Employees will also be trained to recognize counterfeit currency and will receive general fraud protection training.

Product Education

The Company will provide comprehensive training of employees regarding various aspects of marijuana use. Such training will aim to provide all employees with a thorough understanding of the following:

1. The various marijuana strains, and the benefits and drawbacks of each;
2. The various marijuana products and consumption methods, and the benefits and drawbacks of each;
3. The various cannabinoids (including THC and CBD) found in marijuana products and the benefits and drawbacks of each;
4. Dosage information, cannabinoid content and serving size for different marijuana products.
5. Warnings for different marijuana products. Marijuana product education training sessions will be held periodically to keep employees informed on new marijuana products and information on marijuana strains.



LRP shall also require that all employees become familiar with the consumer education materials located at the facility which, pursuant to 935 CMR 500.140(6), will include:

1. A warning that marijuana has not been analyzed or approved by the FDA, that there is limited information on side effects, that there may be health risks associated with using Marijuana, and that it should be kept away from children;
2. A warning that when under the influence of marijuana, driving is prohibited by M.G.L. c. 90, § 24, and machinery should not be operated;
3. Information to assist in the selection of marijuana, describing the potential differing effects of various strains of marijuana, as well as various forms and routes of administration;
4. Materials offered to consumers to enable them to track the strains used and their associated effects;
5. Information describing proper dosage and titration for different routes of administration. Emphasis shall be on using the smallest amount possible to achieve the desired effect. The impact of potency must also be explained;
6. A discussion of tolerance, dependence, and withdrawal;
7. Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs;
8. A statement that consumers may not sell marijuana to any other individual;
9. Information regarding penalties for possession or distribution of marijuana in violation of Massachusetts law; and
10. Any other information required by the Commission.

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Energy Compliance Plan

Scope and Purpose

Identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities. *935 CMR 500.105(15)*

Consideration of opportunities for renewable energy generation including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable. *935 CMR 500.105(15)*

Strategies to reduce electric demand (such as lighting schedules, active load management, and energy storage). *935 CMR 500.105(15)*

Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25, § 21, or through municipal lighting plants. *935 CMR 500.105(15)*

Planning and Goals:

Lazy River Products – Tewksbury LLC will be consistently evaluating new ways to conserve energy and reduce our overall footprint regarding the amount of energy our business consumes. This initiative has been incorporated into all our initial discussions with the company's Architects and Construction Management Firm.

This is a NEW location we are developing within a strip plaza, with other mixed-use tenants. We do not own the space and will be leasing the unit. This plaza is comprised of multiple owners and is governed by a Condo Association. As a tenant we are limited in what we can do to the space and the plaza's property. With that said, the Landlord is aware of this initiative and is cooperating with the limits of the association's agreement.

In the design of this NEW Lazy River Products location, we have done what we can, while still abiding by the CCC's regulations, to bring in as much natural light as possible and to minimize the amount of consumable energy used for lighting during the brighter times of the day/year. We intentionally chose a unit with over 60 feet of glass frontage, well positioned with the rising and setting sun.

The plan is to leverage this to bring as much of that natural light into the facility as possible. We will couple that with a "zoned" lighting schedule, allowing us to shut or dim certain zones during certain times of the day to actively conserve the amount of our energy consumption.

We have also been incredibly selective about the type of lighting fixtures and other related hardware we'll be using in this new build. The entire facility will be the latest LED technology, again to ensure we are consuming the least amount of energy possible to keep the space lit during the times where unnatural light will be needed.

Although there are no MLP's (Municipal Lighting Plants) in the immediate Tewksbury, MA area, we will continue to watch for the addition of a Town/Local Area MLP. If an opportunity presents itself for us to join a newly formed, local





MLP we would seriously consider it. Unfortunately, at the moment this is not an option for us but we will remain vigilant and always keep our eyes open.

Annually the company Executives will be meeting to review new strategies and technologies to help us consistently be moving towards less consumption and more savings regarding the amount of energy the business consumes. Those results will be delivered annually when renewing our licensing and related commitments.





Diversity Plan

Statement of Purpose

This Diversity Plan will outline the Goals, Programs, and Measurements defined by the Cannabis Control Commission (“CCC” or “Commission”) of the initiative(s) Lazy River Products plans to engage in, in order to promote equity within the company in favor of the following demographics:

1. Minorities
 2. Women
 3. Veterans
 4. People with disabilities
 5. LGBTQIA+ individuals
-

Responsibilities

Lazy River Products has outlined methods in which the goals and programs will be tracked and measured for success. Measuring the success of programs is critical in being able to accurately report to the Commission when applying to renew the license. One month before the submission to renew a Lazy River Products license, designated Lazy River Products agents, including members of management, will meet to review the Diversity Plan. As part of this internal review, Lazy River Products will evaluate the plan and measurements, analyze successes and failures, and address potential adjustments. The Human Resources Department is responsible for guiding and ensuring the success of this plan and will update the CEO on progress on a monthly basis.

1. **[GOAL 1]** - Lazy River Products intends to have at least 40% of yearly new hires be minorities, women, veterans, people with disabilities, or LGBTQIA+ individuals, in which that 40% will be comprised of the following cohort designation percentages:
 - i. Minorities (30%)
 - ii. Women (35%)
 - iii. Veterans (15%)
 - iv. People with Disabilities (5%)
 - v. LGBTQIA+ individuals (15%)

[PROGRAM FOR GOAL 1] – 40% of annual new hires falling into the above-listed demographics

- As part of the application process, Lazy River Products uses a voluntary Self-Identity Survey that gives applicants the opportunity to record if they identify as one or more of the above-listed demographics.
- Lazy River Products posts jobs internally, giving all employees the opportunity to refer any friends or family members that are individuals falling into one or more of the above-listed demographics.

[MEASUREMENTS FOR GOAL 1]

- The HR department will use a master tracking sheet to record a new hire’s Self-Identity Survey responses, which identifies if they fall into one or more of the above-listed demographics at the time of employment.





- The HR department will use a master tracking sheet to record if a current employee referred an applicant that became a new hire who identified themselves as one or more of the above-listed demographics.

2. **[GOAL 2]** - Lazy River Products will create internal Diversity & Inclusion opportunities for employees falling in one or more of the demographics throughout the year.

[PROGRAM FOR GOAL 2] – *Creating Diversity & Inclusion opportunities for LRP employees*

- “Employee Spotlight” - Lazy River Products provides employees opportunities throughout the year to participate in an “Employee Spotlight” for our monthly internal Employee Newsletter, specifically for Black History Month, Latinx Month, Pride Month, Women’s History Month, and Disabilities Month.

[MEASUREMENTS FOR GOAL 2]

- The HR department will conduct an annual assessment of participation for this program, to ensure it is a program that employees are participating in.
- The HR department will distribute an annual survey to all staff, seeking new ideas that they would recommend regarding diversity, equity, and inclusion.

3. **[GOAL 3]** - Lazy River Products will provide tools to ensure success by developing an Individualized Career Development Program that focuses on topics such as communication skills, leadership skills, improving areas of improvement, and maximizing off of top strengths.

[PROGRAM FOR GOAL 3] – *Providing tools to ensure success*

- Lazy River Products has developed an Individualized Career Development Training Program that consists of ongoing development specifically tailored to the individual including communication skills, leadership skills, emotional Intelligence, personality traits, and top strengths and areas of improvement.
- The company has an annual goal of 50% (approximately 34 employees) of its employees participating in its Individualized Career Development Program. All employees will be encouraged to participate in the program.
- Lazy River Products employees will learn about its Individualized Career Development Program through new hire orientation, and continuously through our monthly recurring Employee Newsletter.
- The criterion for this program is to be a Lazy River Products employee, having completed an initial 90-day new hire orientation and received an initial 90-day performance review.
- Employees who complete the program will then be in a position to narrow down career and job choices. Although there is not a monetary or tangible incentive provided for completing the program, the incentive takeaway is career development, ultimately helping to lead to career success, wherever the employee’s career may take them. Employees that complete the program will bring strong internal candidacy consideration for future internal promotions when the internal opportunities arise and will also be part of the employee’s annual performance reviews, which may increase consideration for higher performance scoring, which may lead to a larger annual merit increase.

[MEASUREMENTS FOR GOAL 3]

- The HR department will use a master tracking sheet to record all employees who participate and complete the Individualized Career Development Training Program.





- The HR department will use a master tracking sheet to record all internal promotions who are employees falling into one or more of the above-listed demographics. This tracking sheet will be reviewed on an annual basis, to ensure the program is assisting with the career development employees need to succeed.

Diversity Plan Acknowledgements

Lazy River Products pledges to adhere to the requirements set forth in 935 CMR 500.105(4)(a) which provides the permitted advertising, branding, marketing, and sponsorship practices for all Marijuana Establishments. Lazy River Products likewise pledges not to employ any of the prohibited practices articulated in 935 CMR 500.105(4)(b). Finally, none of the actions taken or programs instituted by Lazy River Products will violate the Commission's regulations with respect to limitations on ownership or control or any other applicable state laws.

Related Documents

1. [Guidance on Diversity Plans](#)
2. Self-Identity Survey





Revision History

CHANGE NUMBER	DATE OF CHANGE	CHANGES MADE	EDITS BY
R2.6	11/18/2023	Updates made after Tewksbury DP was created.	K. Lee
R2.7	1/26/2024	Updates made from RFI- TEWKS	K.Lee





Quality Control and Testing

Pursuant to 935 CMR 500.101(1), 935 CMR 500.105, 935 CMR 500.140, 935 CMR 500.160

Purpose:

Lazy River Products, (“LRP” or “Lazy River”), a Marijuana Establishment in the Commonwealth of Massachusetts, has prepared and developed quality control and testing procedures to provide for the safe, orderly, and legal production and distribution of adult-use marijuana.

Quality Control

(“Lazy River”) will comply with the following sanitary requirements:

1. Any employee whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers 105 CMR 300.000, and all edible marijuana products will be prepared, handled, and stored in compliance with sanitation requirements and with the requirements for food handlers.
2. Any Lazy River 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. Lazy River’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 Lazy River’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. Lazy River’s facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. Lazy River 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;
6. Lazy River’s floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. Lazy River’s facility will have adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
8. Lazy River’s buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. Lazy River 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. The Commission may require Lazy River to demonstrate the intended and actual use of any toxic items found on the premises;



11. Lazy River will ensure that its water supply is sufficient for necessary operations, and that such water supply is safe and potable. Any private water source will be capable of providing a safe, potable, and adequate supply of water to meet the Lazy River's needs;
12. Lazy River'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 waste water lines;
13. Lazy River will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. Lazy River 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. Lazy River 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.

Lazy River's, or Transport Company 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. The interior of the transportation vehicles will maintain cleanliness.

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

Recalls

Lazy River 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 Lazy River 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 applicable regulatory provisions, and any such waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations.

Handling and Processing of Marijuana in a Sanitary Manner

Lazy River will process marijuana in a safe and sanitary manner. Lazy River will process the leaves and flowers of the female marijuana plant only, which will be:

- Well-cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, pests and bacterial diseases; satisfying the sanitation requirements in 105 CMR 500.000: Good Manufacturing Practices for Food, and if applicable, 105 CMR 590.000: State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments;
- Prepared and handled on food-grade stainless steel tables with no contact with Lazy River or an agent's bare hands; and



- Packaged in a secure area.

All edible products will be prepared, handled, and stored in compliance with sanitation requirements.

Testing

Lazy River will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as otherwise allowed. 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 pursuant to 935 CMR 500.160. Testing of Lazy River's marijuana products will be performed by an Independent Testing Laboratory in compliance with any and all requisite regulatory protocols, including, but not limited to, the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products ("Protocol"). All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with all regulatory requirements pursuant to 935 CMR 500.105(13).

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 compliance with the Protocol, testing for all production batches of finished plant material will include pesticides and plant growth regulators and production batches to be dispensed as finished Product will be tested for Metals, Bacteria, fungi, mycotoxins, and Cannabinoid profile. All Products sold as resin or concentrates will be tested for Solvents (if used) and Metals with only production batches to be dispensed as finished Product tested for Bacteria, fungi, mycotoxins and Cannabinoid profile. Edibles, tinctures and topicals will be tested for bacteria, fungi, mycotoxins and Cannabinoid profile. In addition, all Products will be tested in accordance with Commission guidance and orders in place at the time of testing.

Single-servings of marijuana products tested for potency in accordance with 935 CMR 500.150(4)(a) will be subject to a potency variance of no greater than plus/minus ten percent (+/- 10%).

Marijuana and marijuana products submitted for retesting prior to remediation must be submitted to an Independent Testing Laboratory other than the laboratory which provided the initial failed result. Marijuana submitted for retesting after documented remediation may be submitted to the same Independent Testing Laboratory that produced the initial failed testing result prior to remediation. Lazy River's policy of responding to laboratory results that indicate contaminant levels are above acceptable limits include notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. Such notification will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

Testing of Lazy River's environmental media will be performed in compliance with any and all requisite regulatory protocols. The environmental media Lazy River will be using will be tested prior to initial use and each time a new source is used.

All excess marijuana will be disposed of in compliance with regulatory requirements, either by the Independent Testing Laboratory returning excess marijuana to Lazy River for disposal or by the Independent Testing Laboratory disposing of it directly. Lazy River will maintain testing results in compliance with all regulatory requirements and the Lazy River



recordkeeping policies and will maintain the results of all testing for no less than one year. Testing dates in excess of one year will be deemed expired and may not be dispensed, sold, transferred or otherwise conveyed until retested.



Personnel Policies Including Background Checks

Lazy River Products (“LRP”) will apply for registration of all its board members, directors, employees, executives, managers, and volunteers who are associated with LRP as Marijuana Establishment Agents. Applications will comply with 935 CMR 500.030. All LRP individuals applying for registration will have signed and notarized CORI Acknowledgement Form, pursuant to 803 CMR 2.09. Applicants will also give authorization to obtain a full set of fingerprints in accordance with M.G.L. c. 94G, § 21. LRP employees will not assume any duties of employment or otherwise participate in the operations of the company unless and until they receive their Marijuana Establishment Agent registration from the Commission. For extensive details on LRP personnel initially registering to be Marijuana Establishment Agents, see documents ‘LRP Background Check Policy’ as well as ‘Hiring Process SOP’.

Once a licensed Marijuana Retailer, LRP’s Human Resources Coordinator is held responsible for the proper registration of new agents.

Record Keeping

LRP will keep and maintain personnel records and personnel policies in accordance with 935 CMR 500.105(9)(d). These records will include but won’t be limited to the following:

- 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. These records shall be maintained for at least 12 months after termination of the individual’s affiliation with LRP and shall 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; and
 - notice of completed responsible vendor and eight-hour related duty training.
- A staffing plan in accordance with 935 CMR 500.105(1)(i) that will demonstrate accessible business hours and safe cultivation conditions;
- Personnel policies and procedures; and
- All background check reports obtained in accordance with 935 CMR 500.030.



LRP shall also maintain and disseminate alcohol-, smoke- and drug-free workplace policies in accordance with 935 CMR 500.105(1)(k). LRP's Human Resources department is ultimately responsible for the keeping and maintenance of these records.

Immediate Termination

In accordance with 935 CMR 500.105(1)(m), LRP has an immediate termination policy that applies to LRP staff who have diverted marijuana, engaged in unsafe practices with regard to the operation of the dispensary, or been convicted or entered a guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving the distribution to a minor.

If LRP determines that diversion has occurred or that an employee has engaged in unsafe practices, LRP will report such findings to the Cannabis Control Commission ("CCC" or "Commission") and/or local law enforcement officials within 24 hours of discovering the reportable event. In accordance with 935 CMR 500.110(9)(b), within 10 days after discovering the reportable event, LRP will file an incident report describing the reportable event and the actions taken by LRP in response to the event.

Training

LRP will ensure that all of its marijuana establishment agents complete training prior to performing any job functions. Training is tailored to roles and responsibilities of the job and will include a Responsible Vendor Program in accordance with 935 CMR 500.105(2)(b). LRP agents will also receive at least 8 hours of on-going training annually in accordance with 935 CMR 500.105(2)(a). For more, see the LRP Qualifications and Training document.

Structural Failure or Power Loss

If the LRP dispensary experiences a structural failure or power loss, the Facilities Manager or its designee will be the one to decide if evacuation is necessary. If evacuation is deemed necessary, the designated LRP manager will verbally transmit the evacuation message or sound the evacuation alarm, depending on the severity of the evacuation. Scenarios exist where only a section of the facility may lose power. To ensure the type of power failure, employees are trained to check separate sections to confirm how much of the facility has lost power. If the entire facility has lost power, staff will move to the facility common area and using emergency lighting, maneuver through the facility towards exits. Once everyone is outside, the facility is locked and secured.

Robbery

LRP employees are instructed to never risk their life for merchandise or money as those can be replaced. In the event of a robbery, LRP employees are trained to remain calm while not trying to outsmart or verbally confront the individual. If staff feels safe, they may push the panic button which will notify authorities. If unable to push a panic button, staff are instructed to call 911 when possible and shall still push the panic button.

If, when opening, the dispensary looks to have been broken into, staff are instructed not to enter, but rather shall alert authorities and management and flee to a safe space.



Fire Emergencies

The LRP dispensary will be equipped with fire alarm systems that include smoke detectors and pull-down alarms that notify the local fire department when triggered. The emergency response system is also equipped with sirens and flashing strobe lights that activate in times of emergencies. At the signal of a fire emergency, employees are to evacuate immediately. Employees are trained to handle fire emergency situations and are educated on some of the dangers when fleeing a fire, for example the varied toxicity of smoke and the importance of avoiding it. Employees are trained to use fire extinguishers and are made familiar of their locations during training. When fires are noticed by employees and not severe, employees are to immediately notify management and utilize the facility's fire extinguishers to extinguish the fire. For more serious fires, the fire alarm is triggered before notification of management.

Bomb or Terrorist Threat (Call)

When a call comes into the facility that identifies itself as a bomb threat, LRP employees are instructed to keep the caller on the line as long as possible. If the caller doesn't give specific details to a bomb, employees are to inquire. LRP trains employees to pay attention to the phone call, specifically for anything that could help in identifying the caller (male or female, other sounds giving locational clues). Immediately after the caller hangs up, the employee receiving the call must report the information to law enforcement authorities. Management will be notified after.

COVID NOTICE: *Due to the outbreak of COVID-19, our business is taking extra precautions for the care of every employee to include enhanced sanitation/disinfecting procedures and full PPE in compliance with CDC guidelines. For updates through this pandemic please refer to the CDC and MA Department of Public Health guidelines, as applicable.*