

Latitude 42 THERAPEUTICS

Application of Latitude 42 Therapeutics LLC for a Host Community Agreement to the Town of Hull, Massachusetts Board of Selectmen.

Date Submitted: December 15, 2020.

Latitude 42 Therapeutics LLC (the “Business” and/or “Applicant”) hereby submits this application requesting consideration for a Host Community Agreement (the “HCA”) to the Town of Hull Board of Selectmen as required by Section 2.00, of the Hull Board of Selectmen Rules and Regulations for Consideration of Requests for Host Community Agreements (the “HCA Regulations”), as adopted by the Hull Board of Selectmen on September 23 2020, a copy of which is attached as **Exhibit A**. This application includes information that completely and truthfully answers the request for information as specified in Section 2.00 of the HCA Regulations and any additional information the Town of Hull (“Hull”) may request.

1. Business documentation:

a. The name of the Business requesting the HCA is:

Latitude 42 Therapeutics LLC, a Massachusetts limited liability company.

b. Documentary Proof of registration for the Applicant to do business in Massachusetts:

A copy of a Certificate of Legal Existence, dated October 21, 2020 and a copy of a Certificate of Good Standing, as issued by the Office of the Secretary of State for the Commonwealth of Massachusetts on October 21, 2020, for Latitude 42 Therapeutics LLC are attached hereto as **Exhibit B**.

2. Documentary proof of notice as specified below that the Business intends to request an HCA with the Town of Hull:

a. Name of individuals and entities intending to request the HCA:

Individual(s): Sean Power, Manager, Chief Executive Officer (the “CEO”)

Entity(ies): Latitude 42 Therapeutics LLC

b. The address of the site where the building proposes to operate:

120 Nantasket Avenue Hull, Massachusetts 02045 (the “Site”)

c. The type of Marijuana Establishment or Medical Marijuana Treatment Center the Business proposes for the Site:

Medical Marijuana Treatment Center (“MTC”) and cultivation facility

Documentary Proof of Notice that the Business has provided is as follows:

a. by publication in a newspaper of general circulation in Hull once in each of two successive weeks, the first publication to be not less than fourteen days before submission of the HCA request:

See Tear Sheets from [*The Hull Times* for October 22, 2020 attached hereto as **Exhibit C**.

b. by prepaid mail to abutters, owners of land directly opposite on any public or private street or way, and abutters to the abutters within three hundred feet of the property line of the petitioner as they appear on the most recent applicable tax list:

See Notarized Certificate of Service Regarding Abutters attached hereto as **Exhibit D**.

3. Resumes, including employment history, for every manager, director, member, employee, executive and volunteer:

a. Sean Power, Founder, Manager and Chief Executive Officer. A life-long resident of the South Shore and current Hull resident, Sean is an entrepreneur who has focused his professional career on building, developing and ultimately selling three health care data technology companies. As a Parkinson’s Disease patient, Sean understands well the needs of individuals with chronic medical conditions. Sean is excited to partner with the town of Hull in medical cannabis which will remain an important growth sector in the healthcare industry for decades to come. A copy of Sean’s Resume is attached as **Exhibit E**.

c. Jeffrey Shaheen, Executive Director for Community and Internal Affairs. Jeff is a life-long resident of Hull and union representative for Local 26 at Fenway Park. Jeffrey has a deep passion for the healing properties and alternative therapies the medical cannabis industry can present—not only

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for common debilitating diseases such as cancer, Parkinson's Disease, and MS but also for those that see cannabis as a possible alternative to prescription opioids for pain management, sleep and other conditions that otherwise would require pharmaceutical products. A copy of Jeff's Resume is attached as **Exhibit F**.

- d. Michael Grasso, Chief Quality Assurance and Production Officer. Michael brings a decade worth of experience in legal medicinal and recreational cannabis business to the Latitude 42 team. Michael has managed the development and operations of licensed cultivation, extraction, infused product production, and retail cannabis businesses in Colorado, Oregon and Massachusetts. Most recently he directed the development, start-up and operations of Nantucket Islands's first fully licensed recreational cannabis cultivation, product production and retail dispensary facility. A copy of Mike's Resume is attached as **Exhibit G**.

4. Identification of every Person, Entity or Close Associate with a 10% or greater equity interest or voting interest, or the Right to control the Business. (See definitions in 935 CMR § 501.002):

Currently Sean Power has 100% equity interest in the Business. If the HCA Application is approved and building permits are issued, then the ownership shall be adjusted to: Sean Power 90%, Jeff Shaheen 10%. A copy of the current Operating Agreement for the Business attached as **Exhibit H**.

5. Proof of current MTC agent registration cards as issued by the CCC pursuant to 935 CMR § 501.030 for the individuals in ¶ 2:

As this application requesting consideration for an HCA is being submitted to the Board of Selectmen as a condition precedent to allowing Hull's governmental permitting officials to commence the official special permitting process required for siting MTCs, as specified by the Hull Zoning By-Law, it is procedurally premature for the either the Business or an individual or entity affiliated with the Business to apply to the Commonwealth of Massachusetts Cannabis Control Commission (the "CCC") for MTC registration cards at this time. The Business reserves the right to seasonably supplement the information contained in this paragraph at the appropriate time.

6. Documentation specifying the site in Hull at which the Business seeks to operate, including metes and bounds description of property and all buildings, accessory buildings, storage containers and other structures or equipment to be used outside buildings and accessory buildings at the site (the “Hull Site”):

The Business seeks to operate in the building at 120 Nantasket Ave Hull, Massachusetts. The building in which the Business intends to operate, a metes and bounds description of the property and all buildings, accessory buildings, storage containers and other structures or equipment to be used outside buildings and accessory buildings on the Hull Site are shown on a plan entitled: “Site Plan-Proposed” a copy of which is attached hereto as **Exhibit I** and a copy of a plan entitled: “Existing Conditions Survey” for the Site (120 Nantasket Avenue Hull, Massachusetts), dated January 6, 2020, as prepared by Feldman Land Surveyors is attached hereto as **Exhibit J**.

7. Documentation fully detailing the Business’s ownership of, or the terms and duration of any other legal right to use, the Hull Site:

The Hull Site is wholly owned by Latitude 42 Real Estate LLC, a Massachusetts limited liability company whose sole manager and member (and hence Owner) is Sean Power. The Business has been granted the legal right to use the Site by the Latitude 42 Real Estate LLC and its Owner, Sean Power.

A copy of a deed from D. J. & Nick Enterprises LLC to Latitude 42 Real Estate LLC which deed is dated December 20, 2019, along with a copy of the Certificate of Legal Existence and Good Standing for Latitude 42 Real Estate LLC are attached hereto as **Exhibit K**.

8. The identity of all current employees of the Business who have experience in cannabis product design, cannabis cultivation, cannabis processing, cannabis marketing, cannabis distribution, cannabis sales and cannabis dispensing, and the specific experience of each employee:

a.) Michael R. Grasso, Chief Quality Assurance and Production Officer for the Business. Mr. Grasso’s specific experience in cannabis product design, cannabis cultivation, cannabis processing, cannabis marketing, cannabis distribution, cannabis sales and cannabis dispensing, is fully disclosed in the information provided by the Business in its response to the request for information contained in the preceding Paragraph Number 3, above. *See also*, Resume of Michael R. Grasso attached hereto as **Exhibit G**.

9. A statement of the planned scope of the Business's operation at the Hull Site, including the License Classes for which it will apply, the products it intends to produce, and the cultivation tier the Business foresees at maximum production:

a. Planned Scope of Business Operations:

The Business is proposing to operate Marijuana Establishment that is known as a Medical Marijuana Treatment Center ("MTC") which is formerly known as a Registered Marijuana Dispensary (RMD) at the Hull Site. The planned scope of the Business's operation at the Hull Site is planned to include the full scope of an MTC as the term MTC is defined by 935 CMR 500.002 and as the MTC is to be licensed under 935 CMR 501.101 permits licensed MTCs to acquire, cultivate, possess, process (including development of related products such as Edible Marijuana or Marijuana Products, MIPs, Tinctures, aerosols, oils, or ointments), transport, sell, distribute, deliver, dispense, or administer Marijuana, products containing Cannabis or Marijuana, related supplies, or educational materials to Registered Qualifying Patients or their Personal Caregivers for medical use. Unless otherwise specified, MTC refers to the site(s) of dispensing, cultivation, and preparation of Cannabis or Marijuana for medical use. By law, an MTC can only dispense its products to legally Registered Qualifying Patients or their Personal Caregivers for medical use. If approved by the Massachusetts Cannabis Control Commission, the Business's operations will focus on three major segments: cultivation, extraction, and Marijuana Infused Products ("MIP") production. If authorized under its license, the Business may deliver marijuana and marijuana products from the Hull Site directly to Registered Qualifying Patients or their Personal Caregivers for medical use only. The Business shall also provide reduced cost or free Marijuana to Registered Qualifying Patients with documented verified financial hardship in connection with its licensed operations.

b. License Classes for which the Business will apply:

Medical Marijuana Treatment Center ("MTC") as defined and licensed under 935 CMR 500.002 and 935 CMR 501.101.

c. Cultivation Tier at Maximum Production:

Tier 3, as the Business is proposing 15,000 square feet of canopy.

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A copy of the *General Operations, Staffing, and Training Plan* for the Business, which fully sets forth the scope of the Business's proposed operations at the Hull Site, as is required by 935 CMR 500.105, General Operational Requirements for Marijuana Establishments, et seq., is attached hereto as **Appendix A**.

10. A statement of the projected revenues and expenses of the operation at the Hull Site, including revenues and expenses expected for each type of product to be manufactured at the Hull Site, revenues and expenses for each type of product to be purchased from other producers, and revenues and expenses from each type of product to be sold to other businesses:

a. Source of Income:

The only source of income for the Business will be from the sale of medical marijuana and medical marijuana products to Registered Qualifying Patients or their Personal Caregivers for medical use as authorized by 935 CMR 501.101. The products will include Edible Marijuana or Marijuana Products, such as MIPs, tinctures, aerosols, oils, or ointments. The product line is at present in the concept development stage, as sales projections for each product separate have not yet come into existence. The projected sales revenues set out below are based upon production levels for total product from similar facilities as determined by the Business's Chief Quality Assurance and Production Officer, Mike Grasso, upon his professional knowledge and experience. The Business will supplement this paragraph when such estimates become available. Production and sale of medical marijuana and/or medical marijuana products will be limited to sales from the Hull Site, which would be the Business's sole marijuana facility. The Business has no plans to sell marijuana or marijuana products to other businesses.

b. Estimated Operational Budget:

This estimated operational budget is based on the professional knowledge and experience of the Business's Chief Quality Assurance and Production Officer, Mike Grasso, and is generally available data that the Business has gathered from: 1) the Massachusetts Cannabis Control Commission and similar agencies regarding the need for medical marijuana in the regulated marijuana industry in Massachusetts; 2) medical marijuana market demographics and other related proprietary statistical data that has been determined by the Business's private due diligence efforts; and 3) some of the assumptions readily available in the field.

Below are the sales projections that the Business has forecast based on the

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foregoing assumptions:

First Year:

\$2,300,000 (From Appointment and Walk-in Registered
Qualifying Patients and/or their Personal Caregivers at the Hull Site)
\$1,000,000 (From Wholesale of products to Medical and Recreational
Dispensaries)
Total \$3,300,000

Second Year:

\$3,000,000 (From Appointment and Walk-in Registered
Qualifying Patients and/or their Personal Caregivers at the Hull Site)
\$2,400,000 (From Wholesale of products to Medical and Recreational
Dispensaries)
Total \$5,400,000

Third Year:

\$4,000,000 (From Appointment and Walk-in Registered
Qualifying Patients and/or their Personal Caregivers at the Hull Site)
\$3,500,000 (From Wholesale of products to Medical and Recreational
Dispensaries)
Total \$7,500,000

c. Facility Start-Up Costs (Budget)¹

- Legal and Consulting expenses including application fees for entity formation, obtaining licenses and permits, market research, community and external affairs media relations and associated consulting expenses: \$225,000.00
- Marketing promotion expenses for opening of the Business's MTC at the Hull Site: \$25,000.00
- Computer Software (Accounting Software, Payroll Software, CRM Software, Microsoft Office, QuickBooks Pro, drug interaction software, Physician Desk Reference software): \$125,000
- Insurance (general liability, workers' compensation and property

¹ The Operational Budget is reflective of costs associated with actual operation of the proposed MTC facility on a yearly basis. It does not include site development and building construction costs, which are separately estimated to be in the range of **\$9M—\$10M**.

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casualty) coverage at a total premium: **\$12,000-\$14,000 per year**

- Rent for 12 months at \$ t/b/d per square foot in the total amount of: \$ **t/b/d²**
- Fit-up of marijuana dispensary remodeling (installation construction of product display cases, cash registers, CCTV, computers, ventilation and odor control systems, office and sales area furniture and fixtures, custom interior finishes, and interior and exterior signage (to the extent permitted by 935 CMR 500.105): **\$375,000**
- Other start-up expenses, including stationery, educational brochures, printing copies of Good Neighbor Agreement for patients to sign, phone and internet connections, and other utility deposits: **\$25,000**
- Operational cost for the first 12 months that the MTC is in operation at the Hull Site (including salaries of employees, real estate taxes, Host Community Agreement costs, philanthropic donations to local community organizations, raw materials acquisition, monthly product manufacturing and associated product production costs, and payments of other normal and customary business expenses: **\$540,000**
- Start-up inventory (stocking with the legally-permitted range of medical marijuana and medical marijuana products): **\$ t/b/d**
- Raw materials and product storage hardware, manufacturing hardware and fixtures, testing laboratory hardware and fixtures (i.e., storage bins, baking ovens, commercial kitchen equipment, racks, shelves, etc.): **\$ \$480,000**
- Packaging Supplies (assorted bottles, boxes, envelopes, etc. for dispensing and shipment): **\$125,000**
- Design, set-up, testing, and launching the Business's website: **\$50,000**
- Soft opening day and associated advertising, media, and community outreach efforts **\$ 25,000**

² The return on capital investment program as between the two affiliated ownership entities has not been fully determined and hence may change at the time of tenant fit-out and leasing.

d. Source of Startup Capital for the Business:

The Business and its affiliate, Latitude 42 Real Estate LLC, are both privately held Massachusetts limited liability companies. Both legal entities are solely owned by Town of Hull resident, Sean Power. The source of funds for both the Business and its affiliate is from the personal funds of Mr. Power.

11. A statement of all other locations at which the Business or its Affiliates plan to operate an MTC or Marijuana Establishment:

There are no locations other than 120 Nantasket Avenue Hull, Massachusetts, where the Business or its affiliates plan to operate an MTC or Marijuana Establishment. *None.*

12. A statement of the Business's experience in the marijuana industry, including length and scope of experience in the specific types of operation proposed for the Hull Site:

The Business's experience in the marijuana industry is as stated in the information provided in the preceding paragraph 3(d) of this application. The Business's experience in the marijuana industry, including its length and scope of experience in the specific types of operation of the proposed site is summarized in the information and resume of the Business's Chief Quality Assurance and Production Officer, Mike Grasso. Mike began his career in legal regulated cannabis in 2011 working for medical dispensaries in Boulder, Colorado. He learned methods and practices firsthand, holding various positions in the legal industry over the last ten years, participating in commercial cannabis businesses as a cultivator, extraction lab tech, budtender, processing and harvest manager, and sales and marketing representative for Headquarters Cannabis Company, Colorado Healing LLC, Weave IQ and The Greenest Green Dispensary to name a few. Additionally, Mike has assisted in the design, development, and successful start-up of vertically integrated, licensed cannabis facilities in Colorado, Oregon, and Massachusetts. He most recently managed the development of and served as Director of Operations for The Green Lady Dispensary, a vertically integrated cannabis production facility in Nantucket, Massachusetts.

In addition to Mr. Grasso, the Business has employed Dan Linskey, of international securing firm Kroll, A division of Duff & Phelps, to design, implement, and personally oversee the operation of the Security Plan at the MTC on the Hull Site in coordination with the Business's Chief Security Officer. Mr. Linskey, a former Chief of Police for the City of Boston, has extensive experience in the security segment of the regulated marijuana industry in Massachusetts.

The Business has contracted with Commercial Construction Consulting, C3 Boston, to design and implement an odor and noise control plan for the facility.

The odor plan C3 has provided takes a belt and suspenders approach to eliminating and removing any odor particles that are produced in the facility from emanating outdoors. The C3 odor control plan incorporates an Odor Removal Molecular Filtration Air System provided by Byers Scientific and Manufacturing. The noise control plan employees generally accepted engineering techniques to control noise from roof top equipment. A copy of the plan for the odor and noise control system is attached hereto as **Exhibit M**.

13. An analysis of the public need for an MTC at the Hull Site which takes into account the demand for MTC services by medical marijuana patients in Hull and surrounding communities, and the current and projected number of MTCs in Hull and surrounding communities:

The public need for medical marijuana and medical marijuana products in Hull, Massachusetts, and its surrounding communities is directly influenced by the state's legalized medical policies and the increasing availability of health care options.

Our Target Market:

The Business plans to serve the medical marijuana needs of a wide range of customers. Generally, those who need and are prescribed medical marijuana (in Massachusetts known as "Registered Qualifying Patients or their Personal Caregivers") include patients suffering from a wide variety of medical ailments and presenting with symptoms such as severe pain, insomnia, anxiety, glaucoma, HIV/AIDS, epilepsy, nausea, cancer, side effects of treatment courses, and other causes for which an attending physician deems medical marijuana an appropriate course of treatment. The Business plans to provide medical marijuana and medical marijuana products at reduced or no cost to Registered Qualifying Patients or their Personal Caregivers) who qualify for the program.

14. The Business's Security Plan, prepared by a qualified specialist acceptable to the Board, including a description of proposed or current security measures:

The Business has retained Kroll, A Division of Duff & Phelps, to prepare and implement a Security Plan as required by 935 CMR 500.100, Security Requirements for Marijuana Establishments, for the Hull Site. A copy of the Security Plan is attached hereto as **Exhibit N** and is also included as a segment to the Business's *General Operations, Staffing, and Training Plan*, which is attached hereto as **Appendix A**. In addition to the requirements for Security Plans specified in 935 CMR 500.100, the Security Plan for the Hull Site has been prepared in accordance with generally accepted security industry practices such as Crime Prevention Through Environmental Design (CPTED), Concentric Circles of Protection, and Integrated Design.

a. **CPTED:**

CPTED is a concept that utilizes planned passive resources, such as architectural barriers, landscaping, and lighting to reduce the necessity of traditional technical and operational security elements, to reduce vulnerability to crime. The key concepts of CPTED include: Natural Access Control: Use of doors, fences, landscaping, and other man-made and natural obstacles to limit access into the building or other defined interior space. Natural Surveillance: Increasing visibility by occupants and observers (security and staff) to increase the detection of unauthorized individuals or misconduct within a facility. Natural Boundary Definition: Establishing a sense of ownership by occupants to increase vigilance in identifying intruders.

b. **Concentric Circles of Protection:**

Concentric Circles of Protection is a concept that is based on varying levels of protection originating at the site perimeter, building perimeter, lobby areas, and interior areas with special control requirements and becoming increasingly more stringent as one proceeds through each level to reach the most critical areas. Intervention zones between each layer of the circle provide opportunities for control, detection, evaluation, and response to undesired activity, intruders, or other unauthorized individuals.

c. **Integrated Design Philosophy:**

Integrated Design Philosophy is a concept that establishes effective security through the integration of electronic systems with architectural elements, enhanced by security staff and procedures. When the integration of these elements is effectively executed, a synergy is created that meets the desired security objective. The premise for utilizing this concept is that architectural, operational, and electronic elements must be implemented to complement one another, thereby creating collaboration between the systems to create a strong security program. No single element of the group can stand alone or operate independently and still provide adequate security protection. Specifics of the elements used include:

- a. General Security Measures
- b. Physical security Measures
- c. Intrusion Alarm Systems
- d. Video Surveillance System
- e. Access Control System
- f. Door Intercom System
- g. Door Interlock System

- h. Cash Management Program
- i. Security Personnel & Training
- j. Product Delivery
- k. Incident Reporting, 935 CMR 500.110 (7)
- l. Security Audits
- m. Packaging of Edible Marijuana Products, 935 CMR 500.105
- n. Good Neighbor Agreement

15. The Business’s Traffic plan, prepared by a qualified specialist acceptable to the Board, demonstrating anticipated traffic impacts and the feasibility of mitigation:

The Business understands that residents care deeply about transportation and traffic. Therefore, the Business has employed a well-known traffic engineering and planning firm, Howard Stein Hudson (“HSH”), to provide a full Transportation and Parking Analysis as is required by the Hull Zoning By-Law Article 39, § 39C-7.3, of applicants applying to the Town’s Planning Board for a special permits for an MTC in the Marijuana Overlay District (“MOD”), including but not limited to detailing proposed street parking systems as required by Article 34, § 34-1A of the Hull Zoning By-Law of applicants for projects requiring Special Permits and Site Plan Review from the town’s Planning Board. Among other things, the Traffic Study will identify possible impact the proposed MTC may have on the surrounding area and propose recommended traffic management solutions.

In addition, HSH is charged with ensuring that a Traffic Plan is prepared for the Business to demonstrate anticipated traffic impacts and the feasibility of mitigation, as required by paragraph 15 of Section 2.00 of the HCA Regulations. A copy of the Traffic Plan as prepared by HSH is attached hereto as **Exhibit M**.

16. The Business’s plan for ensuring that no odors or noise associated with its operations will be detectable outside the buildings on the Hull Site.

The Business is committed to a Zero Emissions facility—meaning that no cannabis odor or noise associated with the Business’s operations will leave the building the Hull Site at any time while the MTC is operating. The Business’s strategy employs the highest level of technology in odor and noise control, building materials, and professional standards.

A copy of the full odor and noise containment plan as prepared by Mike Grasso, the Business’s Chief Quality Assurance and Production Officer, in collaboration with the Business’s mechanical engineering consultant, C3, and the Business’s consulting scientific and manufacturing consultants, Byers Scientific & Manufacturing, is included at **Exhibit N** hereto.

The Business's Odor and Noise Containment Plan ensures Zero Emissions. The Plan requires the Business to employ multiple, redundant odor control measures operating simultaneously to guarantee a fail-safe facility that will mitigate and prevent any cannabis odor from leaving any area of the Hull Site. Not only will the exterior of the Hull Site be odor-free, but the common areas and patient areas of our building will also be odor-free—providing a better employee and patient experience.

The Key components of the Odor and Noise Containment Plan are as follows:

Building Materials & Design:

1. The design of the building will include a new ***sealed superstructure*** to be erected inside the body of the existing building. This superstructure core will allow us to provide an additional barrier to the outside walls as well as build individual, smaller rooms within the superstructure, thus creating multiple layers of insulation.
2. The building design also situates the grow rooms so that they will be housed in a completely separate building from the offices and MTC dispensary. Each individual grow room exists independently from other grow rooms within a hermetically sealed environment. Each room is equipped with multiple odor control equipment, including air curtains, molecular filtration systems, air handlers, and dehumidifiers. The rooms operate like small ***buildings within a building***.
3. Each of the rooms will have sealed walls and floors that are insulated with DPS-brand, closed cell foam modular panels that provide a ***vapor barrier***, which blocks air from leaking out of each room. This type of technology is typically used in restaurant walk-in freezers.
4. Leading out of each cultivation room will be ***state of the art air curtains*** that will shoot air down and prevent any air from escaping out of those rooms.
5. All doors will be sealed, gasketed and equipped with a mechanical sweep that will also ***prevent seepage of odor particles***.

Scientific Odor Control Technology:

1. An advanced ***molecular filtration system*** will be integrated fully into the newly-designed HVAC systems which will use coconut shell carbon material as our media to destroy cannabis smells. The blend of oils within the specialized formula attracts and captures odor molecules utilizing a scientific method called ***adsorption*** to

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neutralize offensive scents. This is not a masking agent but rather a process of eliminating odor particles.

2. ***Independent molecular filtration units*** will be strategically placed in hallways directly outside the grow and processing rooms and other rooms in the facility. These units will independently operate with the same coconut shell material to consistently eliminate odor causing particles.
3. A ***Waterless Vapor System*** will run simultaneously on the exterior of the building, providing an additional odor barrier to give us a “belt and suspenders” approach to eliminate odor causing particles and to meet our commitment to ***Zero Odor Emission***.

Noise Control Technology:

The Project’s mechanical equipment will be specifically engineered and located by the Project’s Consulting engineers C3 Boston so that its operation will not exceed allowable standards for night-time noise levels in residential neighborhoods nor will the operation of the mechanical equipment generate any perceptible change in background noise levels. The Project will perform a full noise analysis on the equipment to be installed at the appropriate time as the Project mechanical design has not yet evolved to building permit application or bid level plans and documents.

Exhibits

- A. Section 2.00, of Hull Board of Selectmen Rules and Regulations for Consideration of Requests for Host Community Agreement.
- B. Secretary of State Certificates
- C. Tear Sheets from Hull Times
- D. Certificate of Service Regarding Abutters
- E. Sean Power Resume
- F. Jeffrey Shaheen Resume
- G. Mike Grasso Resume
- H. Operating Agreement Latitude 2 Therapeutics LLC
- I. Proposed Site Plan
- J. Existing Conditions Survey
- K. Deed and Legal Existence Certificate Latitude 42 Real Estate LLC
- L. Security Plan
- M. Traffic Plan
- N. Odor Control: Noise Reduction Plan

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APPLICANT:

Latitude 42 Therapeutics LLC

By: Sean Power

Sean Power, SOC signatory

Exhibit A

*Section 2.00, of the Hull Board of Selectmen Rules and Regulations for
Consideration of Requests for Host Community Agreements.*

**HULL BOARD OF SELECTMEN
RULES AND REGULATIONS FOR CONSIDERATION OF REQUESTS FOR
HOST COMMUNITY AGREEMENTS**

1.00 Statement of Purpose and Scope of Authority

The Hull Board of Selectmen (“Board”) adopts the following rules and regulations to establish a fair, thorough, and transparent process by which the Board will evaluate each request to enter into a Host Community Agreement with the Town of Hull pursuant to M.G.L. c. 94G to operate a Marijuana Establishment (ME) or Medical Marijuana Treatment Center (MTC).

The Board is authorized to oversee the “general direction and management of the property and affairs of the town in all matters not otherwise provided for by law or by this code” (Town of Hull Town Code/By-laws, Chapter 53 – 1 A), and by the Town of Hull Charter and the Board’s general administrative and regulatory authority. Pursuant to M.G.L. c. 94G, Regulation of the Use and Distribution of Marijuana Not Medically Prescribed, the Selectmen are empowered to decide whether to enter into a Host Community Agreement with any “applicant” who has “proposed locating a marijuana establishment or a medical marijuana treatment center” in the Town of Hull. M.G.L. c. 94G, §§ 1, 3.

On February 12, 2018, during a Special Town Meeting, the Town voted to amend the General By-laws, prohibiting all Marijuana Establishments other than those limited to the “sale, distribution, manufacture or cultivation of marijuana for medical purposes if licensed in accordance with applicable law,” and restricting the number of retail marijuana establishments to two. The rules and regulations set forth here complement the votes of Town Meeting, the General Bylaws and the Town’s Zoning By-Law, and are consistent with c. 94G, § 3 (“Local Control”), which explicitly preserves local authority to establish “reasonable safeguards on the operation of marijuana establishments [that are] not in conflict with this chapter or [CCC] regulations” (c. 94G, § 3(a)); to “govern the time, place and manner of marijuana establishment operations” (§ 3(a)(1)); and to “restrict the licensed cultivation, processing and manufacturing of marijuana that is a public nuisance” (§ 3(a)(3)).

Implementing guidance issued by the Cannabis Control Commission also stresses the independent authority of local officials: “the [CCC] encourages municipalities to carefully consider the impact of the particular marijuana establishment proposed for a community, as well as benefits it may bring in local revenue and employment, when negotiating [an HCA]” (CCC’s “Municipal Guidance” document) and to identify conditions and stipulations of responsibility between the municipality and the applicant (CCC’s “Guidance on Host Community Agreements” document). CCC regulations reinforce local control: “[N]othing in 935 CMR 501.000 [CCC regulations concerning Medical Use of Marijuana] shall be construed to prohibit lawful local oversight and regulation, including fee requirements, that does not conflict or interfere with the operation of 935 CMR 501.000.” “(1) Marijuana Establishments and Marijuana Establishment Agents shall comply with all local rules, regulations, ordinances, and bylaws.” 935 CMR § 500.170. Any applicant for licensure of a Hull Site by the CCC must establish that it has executed a host community agreement with the Town of Hull, that the Town has accepted the Business’s plans to mitigate, noise, odor, and comply with local ordinances and bylaws, and that the Business will comply with all local codes, ordinances and bylaws. (935 CMR § 500.101.)

The Board recognizes that any Business seeking to establish a Medical Marijuana Treatment Center (“MTC”) (the Hull bylaw refers to these facilities under the CCC’s prior designation, “Registered Marijuana Dispensaries”) will, if a Host Community Agreement is reached, undergo Special Permit and Site Plan review by the Hull Planning Board of the physical site, traffic circulation and compliance with Hull votes of town meeting, general bylaws and zoning bylaws, and review by the CCC of many aspects of the proposed operation. The Board must, however, conduct its own review before entering into any Host Community Agreement, to ensure that any proposed operation is appropriately located for the needs of the town; will have appropriate staff, facilities, operational plans, business plans and sufficient funding; and will operate with sufficient technical skill, business competence and financial reserves to ensure that the Town of Hull will not be required to cope with underperformance or closure of an inappropriately sited MTC, loss of jobs, inability to generate projected community impact fees, and cost to the town of dealing with a Marijuana Enterprise that faces loss of funding, bankruptcy or other threats to its operation.

The Board of Selectmen will evaluate all requests to enter into Host Community Agreements in a thorough, fair, and transparent manner, applying the requirements and standards set out in the following rules and rules and regulations. To assist the Board in analyzing the suitability of a Business that requests a Host Community Agreement, these rules and regulations also authorize the Board, pursuant to M.G.L. ch. 44, § 53G and the Town’s general regulatory authority, to require any Business seeking a Host Community Agreement to pay reasonable fees for the employment of outside consultants to advise the Board on any issue relevant to the Board’s review.

The Board retains the authority to suspend or modify, in its discretion, as circumstances may warrant, these Rules and Regulations. A failure by the Board to comply with the terms of these Rules and Regulations shall not affect the validity of any decision of the Board.

These Rules and Regulations are effective immediately upon adoption by the Board, and shall apply to all requests for HCAs, whether submitted prior to adoption of these Rules and Regulations or not.

2.00 Submission of HCA Requests to the Board

A Business requesting an HCA shall submit, completely and truthfully, the information specified below, and any additional information the Town may request.

- 1) The name of the Business and documentation of its registration to do business in Massachusetts.
- 2) Documentary proof of notice as specified below that the Business intends to request a Host Community Agreement with the Town of Hull.

The notice shall state:

- a. The name of the individuals and entities who intend to request the HCA;
- b. The address of the site where the Business proposes to operate;

- c. The type of Marijuana Establishment or Medical Marijuana Treatment Center the Business proposes for the site.

Notice shall be provided as follows:

- a. by publication in a newspaper of general circulation in Hull once in each of two successive weeks, the first publication to be not less than fourteen days before submission of the HCA request;
 - b. by prepaid mail to abutters, owners of land directly opposite on any public or private street or way, and abutters to the abutters within three hundred feet of the property line of the petitioner as they appear on the most recent applicable tax list.
- 3) Resumes, including employment history, for every manager, director, member, employee, executive and volunteer.
 - 4) Identification of every Person, Entity or Close Associate with a 10% or greater equity interest or voting interest, or the Right to control the Business. (*See definitions in 935 CMR § 501.002.*)
 - 5) For Businesses that seek to function as Marijuana Treatment Centers (“MTCs”), proof of current MTC agent registration cards issued by the CCC pursuant to 935 CMR § 501.030 for the individuals in ¶ 2.
 - 6) Documentation specifying the site in Hull at which the Business seeks to operate, including metes and bounds description of property and all buildings, accessory buildings, storage containers and other structures or equipment to be used outside buildings and accessory buildings at the site (the “Hull Site”).
 - 7) Documentation fully detailing the Business’s ownership of, or the terms and duration of any other legal right to use, the Hull Site.
 - 8) The identity of all current employees of the Business who have experience in cannabis product design, cannabis cultivation, cannabis processing, cannabis marketing, cannabis distribution, cannabis sales and cannabis dispensing, and the specific experience of each employee;
 - 9) A statement of the planned scope of the Business’s operation at the Hull Site, including the License Classes for which it will apply, the products, if any it seeks permission to produce, and the cultivation tier, if any, the Business foresees at maximum production if cultivation is permitted by the Board.
 - 10) A statement of the projected revenues and expenses of the operation at the Hull Site, including revenues and expenses expected for each type of product the Business may seek permission to manufacture at the site, revenues and expenses for each type of product to be purchased from other producers, and revenues and expenses from each type of product to be sold to other businesses if the Business seeks permission to do so, all as may be permitted by the Board.
 - 11) A statement of all other locations at which the Business or its Affiliates plan to operate an MTC or Marijuana Establishment.
 - 12) A statement of the Business’s experience in the marijuana industry, including length and scope of experience in the specific types of operation proposed for the Hull Site;
 - 13) An analysis of the public need for an MTC at the Hull Site which takes into account the demand for MTC services by medical marijuana patients in Hull and surrounding communities, and the current and projected number of MTCs in Hull and surrounding communities.

- 14) The Business's Security plan, prepared by a qualified specialist acceptable to the Board, including a description of proposed or current security measures;
- 15) The Business's Traffic plan, prepared by a qualified specialist acceptable to the Board, demonstrating anticipated traffic impacts and the feasibility of mitigation;
- 16) The Business's plan for ensuring that no odors or noise associated with its operations will be detectable outside the buildings on the Hull Site.

3.00 Board Evaluation of HCA Requests

The Board will notify the Business within a reasonable time after submission, but in any event within 30 days,¹ whether its request for an HCA contains the information required by Section 2.00, above. Once the Business's submissions contain the information specified in Section 2.00, the Board will proceed with evaluation of the request. Nothing shall preclude the Board from requesting additional information.

Evaluation Standards: The Board will determine whether, and on what terms, to enter into a Host Community Agreement with the Business according to the following discretionary criteria:

- a. The demonstrated suitability and direct experience of the Business's personnel in the specific forms of cannabis cultivation, processing, marketing, sales and dispensing planned for the Hull Site, as well as the personnel's experience in the scope of operations planned for the Hull site;
- b. The depth of detail and the extent of evidentiary support in the business plan and the Business's demonstration of financial resources;
- c. The proximity of the Hull Site to other similar facilities, the extent to which the proposed operation at the Hull Site meets the needs of Hull and neighboring communities for similar facilities, and the extent to which the location of the Hull Site meets the geographic distribution needs of patients in Hull and neighboring communities;
- d. The impact of the Business's operation on Hull infrastructure, facilities, services, resources, neighborhoods and public areas;
- e. The adequacy of the Business's plans to prevent odors and noise;
- f. The adequacy of the Business's security plan and its ability to eliminate negative impacts on neighborhood.

Expert Consultants: The Board's evaluation may require retention of one or more consultants to advise the Board at the Business's expense, as authorized by M.G.L. ch. 44, § 53G and the general regulatory authority of the town. The Board will notify the Business within a reasonable time after the information required by Section 2.00 has been submitted, but within 30 days in any event,² of the identity of any consultants it has chosen, the issues on which it will

¹ This deadline and all others stated in these Rules and Regulations may be extended by agreement between the Selectmen and the Business or, with advance notice of seven (7) days, by the Selectmen. Failure to meet any deadline in these rules and regulations shall in no event constitute constructive agreement to a Host Community Agreement.

² See Footnote 1.

seek the consultant's opinions, and the consultant's fees. The Board reserves the right to retain under this section additional consultants as the evaluation process proceeds. All consultants will be asked to provide their opinions expeditiously in written reports, which will be shared with the Business.

Consultation With Other Boards, Agencies, Officials and Entities: In evaluating the request for an HCA, the Board may seek the opinions of other state and municipal boards, agencies, authorities and officials, and the opinions of persons and entities with experience relevant to the pending HCA request.

Discretionary Meeting or Meetings With Business During Board Evaluation: Within 45 days after receiving all consultants' reports,³ the Board may, at its discretion, conduct a meeting or meetings with representatives of the Business and the public to discuss whether the Board will enter into an HCA and, if so, the terms of an HCA. The Board will provide members of the public the opportunity to express their views at one or more of any such meetings the Board chooses, in its discretion, to convene.

Board Conclusions Concerning HCA: No later than 45 days⁴ after the last of any discretionary meetings with the Business and the public to assist the Board's evaluation, or, if no discretionary meetings are held, within 45 days of receipt of the final consultant report,⁵ the Board shall meet to consider whether it is willing to enter into an HCA and to decide the essential terms and conditions the Town would require in the requested HCA.

Final Drafting and Execution of HCA If the Board decides that it is willing to enter into an HCA, and has chosen the essential terms it will require in an HCA, it shall notify the Business of the required terms. The Business shall, within 15 days of this notification,⁶ inform the Board of any terms it wishes to include in an HCA. The Board shall meet to consider the Business's proposed terms and any additional terms or modifications the Board requires, and shall notify the Business within 15 days⁷ of its decision on additional or modified terms. Upon final agreement, the parties shall execute the Host Community Agreement.

If the parties are unable to reach agreement, the Board will send the Business written confirmation that its request for an HCA has been denied.

Adopted: September 23, 2020

³ See Footnote 1.

⁴ See Footnote 1.

⁵ See Footnote 1.

⁶ See Footnote 1.

⁷ See Footnote 1.

Exhibit B

Secretary of State Certificates



William Francis Galvin
Secretary of the
Commonwealth

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

October 21, 2020

TO WHOM IT MAY CONCERN:

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

LATITUDE 42 THERAPEUTICS, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **December 4, 2019.**

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; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; and that said Limited Liability Company is in good standing with this office.

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

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

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



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



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

William Francis Galvin
Secretary of the
Commonwealth

October 21, 2020

TO WHOM IT MAY CONCERN:

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

LATITUDE 42 THERAPEUTICS, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **December 4, 2019**.

I further certify that said Limited Liability Company has not filed a certificate of cancellation; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; and that, so far as appears of record, said Limited Liability Company has legal existence.



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

Exhibit C

Tear Sheets from Hull times



CERTIFICATE OF SERVICE

December 15, 2020

I, Kevin J. Joyce, hereby certify that true copies of the tear sheets for the legal notice that appeared in the Hull Times on November 12, 2020 regarding Latitude 42 are attached hereto as Exhibit A and Exhibit B.



Print Name: Kevin J. Joyce

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

BOSTON, MA

On this 15th day of December 2020, before me, the undersigned notary public, personally appeared Kevin J. Joyce, proved to me through satisfactory evidence of identification, which was a driver's license, to be the person whose name signed on the preceding document, and acknowledged to me that he/she signed it voluntarily for its stated purpose.



Notary Public

My Commission Expires 10/26/2026



RONAN A. CARRIER
Notary Public
Commonwealth of Massachusetts
My Commission Expires
October 2, 2026

On Veterans Day, a message about courage and sacrifice

The following remarks were delivered by Lt. Cmdr. Kevin Beck, U.S. Navy (ret.), at ceremonies honoring those Hull residents who have served in the military.

Veterans Day is a special holiday that honors all those who have served, and serve, in the U.S. military – Army soldiers, Navy sailors, Air Force airmen, U.S. Marines, and Coast Guard members.

One hundred and one years ago, Veterans Day originated as Armistice Day on November 11, 1919, the first anniversary of the end of World War I. The U.S. Congress passed a resolution in 1926 for an annual observance, and November 11 became a national holiday beginning in 1938. In 1954, President Dwight D. Eisenhower officially changed the name of the holiday from Armistice Day to Veterans Day. We celebrate today, in honor of all veterans, every year, on the 11th hour, of the 11th day, of the 11th month. Unfortunately, the ongoing pandemic has changed the way we live and now recognize and thank our veterans for their sacrifice and dedication to our nation's values.

At this moment, as I speak to you today, thousands of soldiers, sailors, marines, airmen, and coast guardsmen are deployed around the world, and thousands more are on duty across America. Each of them is separated from families, friends, and loved ones. They all have raised their right hand and sworn an oath to protect our Constitution and our way of life and ensure our freedoms.

As a fellow veteran, my thoughts turn today to the millions of men and women who chose to serve this great country and do so at great sacrifice to themselves, their families, their loved ones, and friends. Less than one-half of 1 percent of the U.S. population currently serve today. Historically, there are more than 17.4 million veterans in the United States. Today, fewer than 300,000 veterans remain alive from World War II. That generation, "the greatest generation," served our country, saved millions of people from the prison camps, and freed a world from tyranny.

Since the end of World War II, Americans have served in conflicts such as the Korean War, Vietnam War, 1991 Gulf War, Yugoslavian War, and, since the attacks of September 11, 2001, the war on terrorism; also, they have gone to battle in Afghanistan, Iraq, Syria, Somalia, and Yemen.

With that said, it may be difficult to understand the selfless dedication of our veterans to our country, who, in turn, ensure our freedoms and democracy.

I would like to take this time and share my military service experiences with you. Early in my career, I served three years in Japan. Only 18 years old when I arrived, and in a foreign country, I was hesitant and nervous. However, I quickly learned that the Japanese people were kind, gracious, and interesting. It was a wonderful experience and a memory I treasure.

I then served at the National Security Agency in Fort Meade, Md., followed by three years in Washington, D.C. Next, I was off to Hawaii and deploying on multiple fast-attack submarines, conducting missions around



Lt. Cmdr. Kevin Beck, U.S. Navy (ret.). [Courtesy photo]

the Pacific and often not seeing daylight for a number of months.

During the early years of my career, I was an enlisted service member and attained the rank of a Navy chief petty officer. Not even two years later, I was commissioned as a U.S. naval officer and spent the next 11 years serving in various roles, from surface ships to the Navy SEALs in the Virginia Beach, Va., area. After the terrorist attacks of September 11, 2001, I, along with thousands of fellow service members became intimately familiar with the landscape of Afghanistan and Iraq. I remember waking for the first time in Afghanistan and thinking I was back in time over a thousand years. The Afghan lifestyle was and remains very primitive compared to what we enjoy.

Like so many of my fellow veterans, I have experienced great loss during my military service. I lost shipmates when the USS Cole was attacked in the Gulf of Aden in Yemen, in 1999. Additionally, many of my SEAL teammates lost their lives in the defense of our freedoms.

Hundreds of thousands of veterans have been severely disabled – physically, mentally, or both, including me.

Unfortunately, we often see and acknowledge a service member who has become physically disabled, but recognizing and understanding someone who deals with the emotional scars of combat is not so easy. Today, an average of 22 veterans a day commit suicide.

Military service is difficult. It means time away from your loved ones, missed holidays, birthdays, graduations, weddings, and much more. It means that when you give your loved ones a kiss goodbye, it may be the last time you do.

I tell you this as all of us, as citizens, owe each and every veteran a debt of gratitude that can never be repaid. Veterans have earned our respect and gratitude, and we must ensure that our veterans are taken care of.

We need to thank our veterans, not only today, but every day.

For the veterans listening and watching today, and those that are not, I salute and thank each of you for your service and sacrifice.

To my fellow residents of Hull, thank you for your recognition of our veterans. It makes me proud to see each of our services and the U.S. flag flying throughout the town and American flags flying from so many homes.

In closing, I would like to say to my fellow veterans: Thank you. I share the pride you feel in being able to say that you are a veteran and that you served in the greatest military the world has ever seen. Our country's greatness is built on the foundation of your courage and sacrifice. HT

Liquor license renewal fees for hard-hit restaurants cut by 50%

By Carol Britton Meyer

Several struggling Hull restaurants with liquor licenses have reached out to the Board of Selectmen seeking partial relief from the upcoming renewal fees, effective Jan. 1, 2021.

"These businesses have been severely impacted since March by the required reduced seating

and other restrictions due to COVID-19," Town Manager Philip Lemnios told the board recently during a remote meeting.

On his recommendation, the board voted to reduce the liquor license renewal fee by 50 percent for restaurants and by 100 percent for the town's two pouring establishments, Jo's Nautical Bar and the C Note, which have both remained closed during the pandemic due to state-imposed regulations prohibiting bars that do not also sell food from reopening.

The loss of revenue from these reductions will amount to about \$27,000, which, Lemnios said, the town could absorb on a one-time basis.

"We need to help ensure a continuing and thriving restaurant industry in Hull. These businesses add to the fabric and quality of life of our community."

The fee reductions apply only to liquor, not common victuals, licenses because the latter fees are much lower. HT

Three Rules for Voting – October 6th, 1774

1. To vote, without fee or reward, for the person they judged most worthy.
2. To speak no evil of the person they voted against.
3. To take care their spirits were not sharpened against those that voted on the other side.

– John Wesley

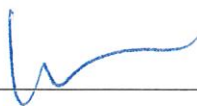
Notice of HCA Application

In accordance with Hull Board of Selectmen *Rules and Regulations for Consideration of Requests for a Host Community Agreement* adopted on September 23, 2020

CERTIFICATE OF SERVICE

December 15, 2020

I, Kevin J. Joyce, hereby certify that true copies of the tear sheets for the legal notice that appeared in the Hull Times on November 19, 2020 regarding Latitude 42 are attached hereto as Exhibit A and Exhibit B.



Print Name: Kevin J. Joyce

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

BOSTON, MA

On this 15th day of December 2020, before me, the undersigned notary public, personally appeared Kevin J. Joyce, proved to me through satisfactory evidence of identification, which was a driver's license, to be the person whose name signed on the preceding document, and acknowledged to me that he/she signed it voluntarily for its stated purpose.



Notary Public

My Commission Expires 10/26/2026



RONAN A. CARRIER
Notary Public
Commonwealth of Massachusetts
My Commission Expires
October 2, 2026

Massport group backs FAA plan to reduce flight paths, noise over Hull

By Carol Britton Meyer

Advocates for quieter Logan International Airport flights over Hull received some good news earlier this month. The Massport Community Advisory Committee voted unanimously on Nov. 4 to support the Federal Aviation Administration's proposed modifications to flight paths over Hull and other South Shore communities.

This action paves the way for the FAA to move forward on implementing alternative tracks that will help mitigate flight noise.

Hull, Hingham, and Cohasset officials wrote a joint letter a couple of months ago in support of efforts to address this issue in the three communities.

"This has been a long process," said David Carlon, the selectmen-appointed Hull member of the Community Advisory Committee and its chairman, in an email to supporters.

"The board would like to thank Dave Carlon and the Massport Community Advisory Committee for their diligent efforts to improve the quality of life for many residents in Hull, Hingham, and Cohasset by way of effecting changes to certain flight patterns resulting in quieter and safer skies over our communities," said Jennifer Constable, chairwoman of the Board of Selectmen. "We realize it was a process that required technical knowledge and a great deal of persistence. Their work yielded success and is greatly appreciated by many in town."

Massport's next step is to make an official request to the FAA to begin the implementation process, "which we expect," Carlon said. "The process will include another review to ensure that policies and procedures have not changed since the proposal was recommended by the FAA. Given the challenges of the pandemic, implementation is expected to take over a year or more."

The letter from the three communities supported two recommendations resulting from a joint study by Dr. R. John Hansman and the MIT flight lab to help resolve long-standing flight noise and other issues associated with the volume of aircraft that fly over Hull, Hingham, and Cohasset when traveling to and from Logan Airport.

The study followed a 2016 memorandum of understanding between the Federal Aviation Administration and Massport, which runs the airport, in an attempt to alleviate overflight noise impacts.

Carlon thanked state Rep. Joan Meschino and state Sen. Patrick O'Connor for their efforts on behalf of the three towns to accomplish the change and for shepherding the community letter to Massport and the FAA. They and U.S. Rep. Stephen Lynch, of Boston, have been active in the process of addressing airport-related issues for some time.

"This process has been years in the making, and I will advocate that the flight pattern modifications be implemented in an expedited time frame. Flight noise along the South Shore has been a consistent issue, and my hope is that these changes will provide relief to the residents," said O'Connor, of Weymouth. "The communities of Hull, Hingham, Cohasset, and the entire South Shore have been fighting for these changes, and we would not be where we are today without the tireless work of Dave Carlon and the Massport CAC."

Meschino also commended Carlon's efforts. "Dave has done a tremendous job shepherding the FAA flight path modifications from inception to adoption. This clearly demonstrates the power

• Continued on page 9



CLEARING THE AIR: Hull skies may be quieter due to proposed modifications to flight paths over the South Shore. [Hull Times archive photo]

Board chair holds out hope for 714 bus; ferry remains uncertain

By Carol Britton Meyer

While saying she cannot make any promises at this time, Board of Selectmen Chairwoman Jennifer Constable is hopeful, based on feedback at recent meetings regarding the MBTA's proposals to eliminate Hull/Hingham ferry service and the 714 bus, that the bus-related recommendation may be reconsidered.

"I think the MBTA may really be hearing us when we point out that the loss of 714 bus service, combined with the proposed elimination of Hull/Hingham ferry service, would really be taking away all of Hull's public transportation," Constable said.

What the MBTA is referring to as alternate method of transportation, the Greenbush commuter rail service from the West Hingham or Nantasket Junction stations, is not viable, Constable insisted, because neither is within easy walking or biking distance.

Town Manager Philip Lemnios noted that many Hull residents take the 714 bus to their jobs at businesses located along Route 3A as well as to medical and other appointments.

"We want residents and businesses to know that the Board of Selectmen is advocating very hard for preserving the 714 bus as well as ferry service," he said during this week's remote board meeting.

Significant cuts are also proposed for the Greenbush commuter rail service in the face of the T's huge deficit resulting from low ridership due to so many people working from home during the coronavirus pandemic.

Ferry supporters are opposed to any cuts in service but are particularly concerned that, if it is eliminated even temporarily, ferry service may never be restored.

The next important forum before a final decision is made on Dec. 7 about which MBTA services will actually be reduced or eliminated is this Monday, Nov. 23, at 6 p.m. The remote meeting will focus on proposed cutbacks that would specifically affect the South Shore. (Visit savetheferry.org for meeting details and to sign up.)

More than 6,500 residents of Hull and other South Shore communities have already signed a petition posted on the Town of Hull website opposing the elimination of ferry service. **HT**

Notice of HCA Application

In accordance with Hull Board of Selectmen *Rules and Regulations for Consideration of Requests for a Host Community Agreement* adopted on September 23, 2020

Notice is hereby given that Latitude 42 Therapeutics, LLC will submit an application for a Host Community Agreement for a Medical Marijuana Treatment Center to be located at:

120 Nantasket Avenue, Hull, MA 02045

If you have any questions about this meeting or have comments about the proposal please contact:

Community@Latitude42hull.com

Abutter's Notice

Notice of HCA Application

In accordance with Hull Board of Selectmen *Rules and Regulations for Consideration of Requests for a Host Community Agreement* adopted on September 23, 2020

Notice is hereby given that Latitude 42 Therapeutics, LLC will submit an application for a Host Community Agreement for a Medical Marijuana Treatment Center to be located at:

120 Nantasket Avenue, Hull, MA 02045

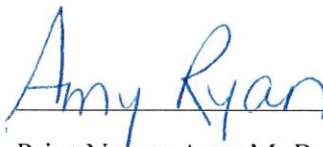
If you have any questions about this meeting or have comments about the proposal please contact:
Community@Latitude42hull.com

December 15, 2020

CERTIFICATE OF SERVICE

December 15, 2020

I, Amy M. Ryan, hereby certify that I mailed a copy of the foregoing Notice Letter to all abutters listed on the attached list separately by first class mail addressed as their name appears on the attached list.



Print Name: Amy M. Ryan

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

BOSTON, MA

On this 15th day of December 2020, before me, the undersigned notary public, personally appeared Amy M. Ryan, proved to me through satisfactory evidence of identification, which was a driver's license, to be the person whose name signed on the preceding document, and acknowledged to me that he/she signed it voluntarily for its stated purpose.



Notary Public

My Commission Expires 10/26/2026



RONAN A. CARRIER

Notary Public

Commonwealth of Massachusetts

My Commission Expires

October 2, 2026

MA/DCR
 251 CAUSEWAY ST
 BOSTON, MA 02114

NANTASKET HOSPITALITY GROUP
 10 STRATFORD TERRACE
 COHASSET, MA 02125

WILLIAMS RANDY E & HEIDI
 280 ATLANTIC AVE
 HULL, MA 02045-0000

MA/DCR
 251 CAUSEWAY ST
 BOSTON, MA 02114

NANTASKET HOSPITALITY GROUP
 10 STRATFORD TERRACE
 COHASSET, MA 02125

CONNORS TRACEY
 276 ATLANTIC AVE
 HULL, MA 02045

MA/DCR
 251 CAUSEWAY ST
 BOSTON, MA 02114

NANTASKET HOSPITALITY GROUP
 10 STRATFORD TERRACE
 COHASSET, MA 02125

SULLIVAN JOHN P & ANNA T
 23 WESTMORELAND ST
 DORCHESTER, MA 02124

PHILLIPS KAREN M
 1 ROCKLAND HOUSE RD
 HULL, MA 02045-0000

OCEAN PLACE CONDO ASSOCIATION
 121 NANTASKET AVE
 HULL, MA 02045-0000

LEONARD ROBERT J & ITA B
 25 STATE PK RD
 HULL, MA 02045-0000

WEISER ERIC
 15 ROCKLAND HOUSE RD
 HULL, MA 02045-0000

CORKERY FRANCIS X & BARBARA A
 PO BOX 149
 HULL, MA 02045

MCELHINNEY THOMAS J TRS
 PO BOX 300010
 JAMAICA PLAIN, MA 02130

TRUGLIA ANTHONY & PHAEDRA
 8 OLNEY STREET
 HULL, MA 02045

SCHLEIFF WILLIAM R & MARIE E
 29 STATE PARK RD
 HULL, MA 02045-3210

OCEANIA RESIDENCES CONDO
 1 LONGBEACH AVE
 HULL, MA 02045

LAVOIE RICHARD J & BARBARA S
 6 OLNEY ST
 HULL, MA 02045-0000

CONGREVE STREET CORP
 1 CITIZENS DR STE 4
 RIVERSIDE, RI 02915-0000

HULL TOWN OF
 253 ATLANTIC AVENUE
 HULL, MA 02045-0000

SEAWATCH OWNER ASSOCIATION
 20 ROCKLAND HOUSE RD
 HULL, MA 02045-0000

GRATTA PAUL V TRS
 PO BOX 421
 HULL, MA 02045-0000

BROYLES ANA
 32 BURKE LANE
 WELLESLEY HILLS, MA 02481

CEDARWOOD VILLAGE LLC
 P.O. BOX 224
 HINGHAM, MA 02043

GRATTA PAUL V TRS
 PO BOX 421
 HULL, MA 02045-0000

HULL TOWN OF
 253 ATLANTIC AVENUE
 HULL, MA 02045-0000

CEDARWOOD VILLAGE LLC
 P.O. BOX 224
 HINGHAM, MA 02043

PAGLIUCA CESARE F
 249 FOREST STREET
 MEDFORD, MA 02155-0000

DONNELLY JOHN R & LAURIE
 6 LONG BEACH AVENUE
 HULL, MA 02045

20 ROCKLAND HOUSE RD 201 39-184-A

LUC: 102

BOCK NANCY M

 20 ROCKLAND HSE RD #201
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 306 39-184-L

LUC: 102

 CALCAGNO JOHN B TRS ROCKLAND H OUSE TRUS
 C/O DONNA PERRY
 20 ROCKLAND HSE RD #306
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 102 39-184-2

LUC: 102

 CEDARWOOD VILLAGE LLC
 P.O. BOX 224
 HINGHAM, MA 02043

20 ROCKLAND HOUSE RD 203 39-184-C

LUC: 102

 CEDARWOOD VILLAGE LLC
 P.O. BOX 224
 HINGHAM, MA 02043

20 ROCKLAND HOUSE RD 304 39-184-J

LUC: 102

 COLBERT KATHLEEN A
 20 ROCKLAND HOUSE RD #304
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 404 39-184-P

LUC: 102

 COLE DEREK A & LYDIA I TRS
 COLE FAMILY REV TR
 20 ROCKLAND HOUSE RD #404
 HULL, MA 02045

20 ROCKLAND HOUSE RD 305 39-184-K

LUC: 102

 CONWAY WILLIAM J & DENISE M
 20 ROCKLAND HOUSE RD #305
 HULL, MA 02045

20 ROCKLAND HOUSE RD 503 39-184-U

LUC: 102

 DEYCH ROMAN
 20 ROCKLAND HOUSE RD #503
 HULL, MA 02045

20 ROCKLAND HOUSE RD 402 39-184-N

LUC: 102

 DOLAN THERESA M
 C/O DOLAN GEORGE F
 20 ROCKLAND HSE RD #402
 HULL, MA 02045

20 ROCKLAND HOUSE RD 403 39-184-O

LUC: 102

 FISH RICHARD A & LORETTA C TRS
 LORETTA C FISH LIVING TRUST
 20 ROCKLAND HSE #403
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 501 39-184-S

LUC: 102

FOX JAMES

 20 ROCKLAND HOUSE RD #501
 HULL, MA 02045

20 ROCKLAND HOUSE RD 103 39-184-3

LUC: 102

 GALLIGAN JOHN P
 GALLIGAN WILLIAM T
 20 ROCKLAND HSE RD #103
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 505 39-184-W

LUC: 102

 GRANT KENDRA LYNN
 20 ROCKLAND HOUSE RD #505
 HULL, MA 02045

20 ROCKLAND HOUSE RD 206 39-184-F

LUC: 102

 KANE JOAN TRS
 ROCKLAND HOUSE ROAD REALTY TR
 20 ROCKLAND HOUSE RD #206
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 601 39-184-5

LUC: 102

 LABELLE SUSAN P
 20 ROCKLAND HSE RD #601
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 507 39-184-Y

LUC: 102

 MCCANN PATRICK
 DUARTE MONIQUE N
 20 ROCKLAND HOUSE RD #507
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 504 39-184-V

LUC: 102

 MCCRANN REGINA CLARE
 20 ROCKLAND HSE RD #504
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 204 39-184-D

LUC: 102

 MOSKOWITZ ROBB M & NANCY ANN
 12 HEADWATERS DR
 HALIFAX, MA 02338

20 ROCKLAND HOUSE RD 406 39-184-R

LUC: 102

 MOTYKA MARY E TRS
 20 ROCKLAND HOUSE RD TR
 20 ROCKLAND HSE RD #406
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 302 39-184-H

LUC: 102

 NELDER LOUISE T
 20 ROCKLAND HSE RD #302
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 506 39-184-X

LUC: 102

 POWERS EILEEN R
 C/O HUNT EILEEN R
 20 ROCKLAND HSE RD #506
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 205 39-184-E

LUC: 102

 RANSON JUDI-ANN
 20 ROCKLAND HSE RD #205
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 104 39-184-4

LUC: 102

 ROSEN MICHAEL L & LISA ANNE
 20 ROCKLAND HOUSE RD #104
 HULL, MA 02045

20 ROCKLAND HOUSE RD 303 39-184-I

LUC: 102

 SORRENTINO LINDA L
 20 ROCKLAND HOUSE ROAD #303
 HULL, MA 02045

20 ROCKLAND HOUSE RD 202 39-184-B

LUC: 102

 STANLEY MICHAEL P
 375B NEPONSET ST
 NORWOOD, MA 02062-0000

20 ROCKLAND HOUSE RD 301 39-184-G

LUC: 102

 SULLIVAN JENNIFER
 20 ROCKLAND HOUSE RD #301
 HULL, MA 02045

20 ROCKLAND HOUSE RD 405 39-184-Q

LUC: 102

 TONER CATHERINE
 20 ROCKLAND HOUSE RD #405
 HULL, MA 02045

20 ROCKLAND HOUSE RD 401 39-184-M

LUC: 102

 VERVILLE KENNETH A
 20 ROCKLAND HSE RD #401
 HULL, MA 02045-0000

20 ROCKLAND HOUSE RD 502 39-184-T

LUC: 102

 WAGNER JOHN & CAROLINE
 20 ROCKLAND HOUSE RD #502
 HULL, MA 02045

20 ROCKLAND HOUSE RD 508 39-184-Z

LUC: 102

 WOLF RICHARD A & JANICE M
 TRS WOLF LIVING TRUST
 2097 HOPESPRING LOOP
 THE VILLAGES, FL 32162

AVERY

5960

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20 ROCKLAND HOUSE RD 101 39-184-1

LUC: 102

ZHANG MARY
33 OLYMPIC COURT
WALPOLE, MA 02032

Pat: avery.com/patents

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1 LONG BEACH AVE 402 48-019-402

LUC: 102

1 LONGBEACH AVE #402 RLTY TR

POTTER ERIK T TRS

1 LONG BEACH AVE #402

HULL, MA 02045

1 LONG BEACH AVE 401 48-019-401

LUC: 102

DICENSO ROBERT E & DENISE A

1 LONGBEACH AVE #401

HULL, MA 02045

1 LONG BEACH AVE 201 48-019-201

LUC: 102

DUNLAP DAVID H JR

INGOLDSBY MARY E LIFE EST

1 LONG BEACH AVE #201

HULL, MA 02045

1 LONG BEACH AVE 203 48-019-203

LUC: 102

GRAHAM THOMAS C

OCONNOR CATHERINE A

1 LONG BEACH AVE #203

HULL, MA 02045

1 LONG BEACH AVE 301 48-019-301

LUC: 102

GREEN RICHARD W & JUDITH F

1 LONG BEACH AVENUE #301

HULL, MA 02045

1 LONG BEACH AVE 302 48-019-302

LUC: 102

HUBBELL CONSTANCE N TRS

CONSTANCE N HUBBELL 2000 REV TR

1 LONG BEACH AVE #302

HULL, MA 02045

1 LONG BEACH AVE 303 48-019-303

LUC: 102

KILDUFF JAY R

1 LONG BEACH AVENUE #303

HULL, MA 02045

1 LONG BEACH AVE 304 48-019-304

LUC: 102

KILDUFF JAY R.

1 LONG BEACH AVE #304

HULL, MA 02045

1 LONG BEACH AVE 204 48-019-204

LUC: 102

MACKEY LINDA & MARK TRS

MACKEY FAMILY TRUST

7090 N ORACLE RD SU 178 BOX 207

TUCSON, AZ 85704

1 LONG BEACH AVE 104 48-019-104

LUC: 102

NASH TIMOTHY J & SUSAN S

1 LONG BEACH AVENUE #104

HULL, MA 02045-3261

1 LONG BEACH AVE 102 48-019-102

LUC: 102

RABBITT EDWARD C & ANNE C TRS

EDWARD C & ANNE C RABBITT REV LIVING TR

10134 BERTRAM LN

FORT MYERS, FL 33919

1 LONG BEACH AVE 404 48-019-404

LUC: 102

REDDY SARATHCHANDRA I

REDDY KIRANMAYI P

20 WEBSTER ST #707

BROOKLINE, MA 02446

1 LONG BEACH AVE 403 48-019-403

LUC: 102

RYAN DOUGLAS J & CYNTHIA R

1 LONG BEACH AVENUE #403

HULL, MA 02045

1 LONG BEACH AVE 101 48-019-101

LUC: 102

TURNER GERALD J TRS

SOTREL IRREV TR

1 LONG BEACH AVENUE #101

HULL, MA 02045

1 LONG BEACH AVE 202 48-019-202

LUC: 102

WISNIEWSKI MELISSA

82 WHITCOMB AVE

HINGHAM, MA 02043

1 LONG BEACH AVE 103 48-019-103

LUC: 102

YI SCOTT JAMES & VERNA

1 LONGBEACH AVE UNIT #103

HULL, MA 02045

121 NANTASKET AVE 409 39-409
 LUC: 102

 ALBANO HEDWIG A & ESPERANZA
 121 NANTASKET AVE #409
 HULL, MA 02045-0000

 121 NANTASKET AVE 302 39-302
 LUC: 102

 ALBERT ELEANOR N TRS
 ELEANOR ALBERT FAMILY TRUST
 121 NANT AVE #302
 HULL, MA 02045-0000

 121 NANTASKET AVE 702 39-702
 LUC: 102

 BALDASSINI JAMES D
 121 NANTASKET AVE #702
 HULL, MA 02045

 121 NANTASKET AVE 102 39-200
 LUC: 102

 BANNISTER RANDOLPH C
 121 NANTASKET AVE #102
 HULL, MA 02045

 121 NANTASKET AVE 704 39-704
 LUC: 102

 BOWERS THOMAS F JR & JANICE L
 121 NANTASKET AVE #704
 HULL, MA 02045

 121 NANTASKET AVE 406 39-406
 LUC: 102

 BREEN LINDA M TRS LINDA M BREEN REVOCABLE
 121 NANTASKET AVE #406
 HULL, MA 02045-0000

 121 NANTASKET AVE 202 39-202
 LUC: 102

 BROADLEY ANN S
 121 NANTASKET AVENUE #202
 HULL, MA 02045

 121 NANTASKET AVE 807 39-807
 LUC: 102

 BROOKER DONALD F & RUTH L
 121 NANTASKET AVE #807
 HULL, MA 02045-0000

 121 NANTASKET AVE 405 39-405
 LUC: 102

 BYRNES DOROTHEA R
 HAMILTON SUSAN
 121 NANTASKET AVENUE #405
 HULL, MA 02045

 121 NANTASKET AVE 701 39-701
 LUC: 102

 CAMPBELL TIMOTHY & MURPHY ROBERTA TRS C/
 121 NANT AVE UN 701
 HULL, MA 02045-0000

 121 NANTASKET AVE 501 39-501
 LUC: 102

 CARAGAY ALEGRIA B & ADLER NORMAN
 121 NANT AVE UN 501
 HULL, MA 02045-0000

 121 NANTASKET AVE 502 39-502
 LUC: 102

 CARAGAY ALEGRIA B & ADLER NORMAN
 121 NANT AVE UN 501
 HULL, MA 02045-0000

 121 NANTASKET AVE 305 39-305
 LUC: 102

 CARRAHER BONNIE L
 121 NANTASKET AVENUE #305
 HULL, MA 02045

 121 NANTASKET AVE 705 39-705
 LUC: 102

 CHASE WILLIAM J TRS
 WILLIAM J CHASE REV TRUST
 9360 W MAIDEN CT
 VERO BEACH, FL 32963

 121 NANTASKET AVE 206 39-206
 LUC: 102

 CHRISTIAN RICHARD G & SOPHIE
 TRS CHRISTIAN FAMILY TRUST
 121 NANTASKET AVE #206
 HULL, MA 02045

 121 NANTASKET AVE 703 39-703
 LUC: 102

 COLLINS JOHN
 23 WYCLIFF AVE
 BOSTON, MA 02132-0000

 121 NANTASKET AVE 802 39-802
 LUC: 102

 COLLINS JULIE
 121 NANTASKET AVE #802
 HULL, MA 02045

 121 NANTASKET AVE 806 39-806
 LUC: 102

 CORRADO RALPH C TRS
 RALPH C CORRADO TRUST
 121 NANTASKET AVE #806
 HULL, MA 02045-0000

 121 NANTASKET AVE 203 39-203
 LUC: 102

 COSTELLO PETER D & DIANNE M
 TRS COSTELLO REVOCABLE TRUST
 121 NANTASKET AVE # 203
 HULL, MA 02045

 121 NANTASKET AVE 708 39-708
 LUC: 102

 CREPEAU RONALD D
 121 NANTASKET AVE #708
 HULL, MA 02045-0000

 121 NANTASKET AVE 402 39-402
 LUC: 102

 DAME ROBERT R & WINIFRED M
 121 NANTASKET AVE #402
 HULL, MA 02045

 121 NANTASKET AVE 407 39-407
 LUC: 102

 DAVINE JULIE A TRS
 THE GREGORY & BEVERLY COBB FAMILIES INC
 121 NANTASKET AVE #407
 HULL, MA 02045-0000

 121 NANTASKET AVE 509 39-509
 LUC: 102

 DAVIS PHYLLIS D & BALOMATIS CHRISTOPHER
 121 NANTASKET AVE #509
 HULL, MA 02045-0000

 121 NANTASKET AVE 201 39-201
 LUC: 102

 DE COSTA MARY K
 121 NANTASKET AVENUE #201
 HULL, MA 02045

 121 NANTASKET AVE 503 39-503
 LUC: 102

 DEVLIN ROBERTA A
 121 NANTASKET AVE #503
 HULL, MA 02045-0000

 121 NANTASKET AVE 606 39-606
 LUC: 102

 DEVOE BRANDON
 121 NANTASKET AVENUE #606
 HULL, MA 02045

 121 NANTASKET AVE 504 39-504
 LUC: 102

 DION ROBERT G
 DAVLIN CECILIA B TRS
 121 NANTASKET AVE #504
 HULL, MA 02045

 121 NANTASKET AVE 808 39-808
 LUC: 102

 EPSTEIN BETSEY W
 121 NANTASKET AVE #808
 HULL, MA 02045-0000

 121 NANTASKET AVE 301 39-301
 LUC: 102

 FEINBERG JILL M
 121 NANT AVE UN 301
 HULL, MA 02045-0000

 121 NANTASKET AVE 607 39-607
 LUC: 102

 FROIO CAROL A
 121 NANTASKET AVE #607
 HULL, MA 02045-0000

121 NANTASKET AVE 505	39-505
LUC: 102	
GABRUK LINDA A TRS DEVANEY RITA V TRS 121 NANTASKET AVENUE #505 HULL, MA 02045	
121 NANTASKET AVE 804	39-804
LUC: 102	
GIBSON KAREN G 121 NANTASKET AVE #804 HULL, MA 02045-0000	
121 NANTASKET AVE 603	39-603
LUC: 102	
GODFREY LAWRENCE W 121 NANTASKET AVE #603 HULL, MA 02045-0000	
121 NANTASKET AVE 208	39-208
LUC: 102	
GOVONI MARY LOU 121 NANTASKET AVE #208 HULL, MA 02045-0000	
121 NANTASKET AVE 308	39-308
LUC: 102	
GURLEY GEORGE K & SHIRILL R TRS ARTHUR RLTY TRUST 35 GURLEY LANE BRIDGEWATER, MA 02324	
121 NANTASKET AVE 307	39-307
LUC: 102	
HASSAN HICHAM ALI 218 NEWBURY ST SU 3 BOSTON, MA 02116	
121 NANTASKET AVE 209	39-209
LUC: 102	
HORSFORD PETER A & SUSAN D TRS HORSFORD FAM TR 121 NANTASKET AVE #209 HULL, MA 02045-0000	
121 NANTASKET AVE 506	39-506
LUC: 102	
JACOBS KATHRYN A 121 NANTASKET AVENUE #506 HULL, MA 02045-0000	
121 NANTASKET AVE 403	39-403
LUC: 102	
KATIBIAN JOHN K & EVELYN A TRS KATIBIAN FAM 121 NANTASKET AVE #403 HULL, MA 02045-0000	
121 NANTASKET AVE 601	39-601
LUC: 102	
KIDD MICHAEL SUSAN 121 NANTASKET AVE #601 HULL, MA 02045	

121 NANTASKET AVE 309	39-309
LUC: 102	
KUPSC LISA 903 NANTASKET AVE HULL, MA 02045	
121 NANTASKET AVE 207	39-207
LUC: 102	
LINCOLN DONALD C & BRIAN D TRS LINCOLN FAM IRREV TR 121 NANTASKET AVE # 207 HULL, MA 02045	
121 NANTASKET AVE 304	39-304
LUC: 102	
LOCKE LUCY ANN PO BOX 507 SCITUATE, MA 02066	
121 NANTASKET AVE 707	39-707
LUC: 102	
LUCID ARLENE L LIFE EST INEZIAN AMY A TRS 121 NANTASKET AVE #707 HULL, MA 02045-0000	
121 NANTASKET AVE 408	39-408
LUC: 102	
LYONS CHRISTINE A & MICHAEL R TRS LYONS FAM RLTY TR 121 NANTASKET AVE UNIT #408 HULL, MA 02045	
121 NANTASKET AVE 805	39-805
LUC: 102	
MILLARD ELIZABETH J TRS M & A LIVING TRUST 121 NANTASKET AVE #805 HULL, MA 02045-0000	
121 NANTASKET AVE 303	39-303
LUC: 102	
MILLER CHERYL TRS CHERYL A MILLER TRUST 121 NANTASKET AVE UNIT 303 HULL, MA 02045	
121 NANTASKET AVE 508	39-508
LUC: 102	
MUURAHAINEN NORMA SIMONS GREGG C 121 NANTASKET AVENUE #508 HULL, MA 02045	
121 NANTASKET AVE 609	39-609
LUC: 102	
NORE JOSEPH P 19 SUMMER ST WESTWOOD, MA 02090-0000	
121 NANTASKET AVE 709	39-709
LUC: 102	
NORE MITCHELL J & JANET PO BOX 478 MEDFIELD, MA 02052-0478	

121 NANTASKET AVE 809	39-809
LUC: 102	
OBRIEN SIOBHAN KELLY BRIAN P 121 NANTASKET AVE #809 HULL, MA 02045	
121 NANTASKET AVE 306	39-306
LUC: 102	
PATTERSON LILLIAN V 121 NANTASKET AVE #306 HULL, MA 02045-0000	
121 NANTASKET AVE 706	39-706
LUC: 102	
PETRIE JANE L 121 NANTASKET AVE #706 HULL, MA 02045-0000	
121 NANTASKET AVE 803	39-803
LUC: 102	
PRENDERGAST MARY F 121 NANTASKET AVE #803 HULL, MA 02045	
121 NANTASKET AVE 205	39-205
LUC: 102	
RANDALL CLEMENTINA 236 CUSHING ST HINGHAM, MA 02043	
121 NANTASKET AVE 608	39-608
LUC: 102	
SCHNIPPER PHILIP D & AMY C ALBERT C/O LYONS ANNE 121 NANTASKET AVENUE #608 HULL, MA 02045	
121 NANTASKET AVE 801	39-801
LUC: 102	
SCHOLL RICHARD & BRENDA 121 NANTASKET AVE #801 HULL, MA 02045-0000	
121 NANTASKET AVE 101	39-199
LUC: 102	
SCOTT JOANN WRIGHT TRS NANTASKET WRIGHT RLTY TRUST 54 BOWKER ST NORWELL, MA 02061	
121 NANTASKET AVE 507	39-507
LUC: 102	
SMITH CHERYL S PO BOX 274 ACCORD, MA 02018	
121 NANTASKET AVE 602	39-602
LUC: 102	
SWEENEY CHARLES FRANCIS 121 NANTASKET AVE #602 HULL, MA 02045	

121 NANTASKET AVE 404 39-404
LUC: 102

TANDON PRADIP & ROSHNI
158 UNION STREET
NORFOLK, MA 02056

121 NANTASKET AVE 605 39-605
LUC: 102

TOCCHIO FIORINDA I
TRS TOCCHIO FAMILY TRUST
121 NANTASKET AVE UNIT 605
HULL, MA 02045

121 NANTASKET AVE 204 39-204
LUC: 102

VALENTE BARBARA A & DAVID C TRS
BARBARA A VALENTE REV TR
82 SUMMER ST
NORWELL, MA 02061

121 NANTASKET AVE 401 39-401
LUC: 102

WARREN MARK G TRS
MARK G WARREN IRREV SECURITY
P.O. BOX 1152
BROCKTON, MA 02303

121 NANTASKET AVE 604 39-604
LUC: 102

WOOD CHRISTINE C TRS WOOD NOMI NEE TR II
121 NANTASKET AVE #604
HULL, MA 02045-3175

SZABO FITNESS & ACCUPUNCTURE
121 NANTASKET AVE
HULL, MA 02045

NAIL CARE
C/O DON BANH
121 NANTASKET AVE
HULL, MA 02045

LITTLE SHOP OF PAULA
121 NANTASKET AVE
HULL, MA 02045

NANTASKET PHYSICAL THERAPY
121 NANTASKET AVE
HULL, MA 02045

TOAST LLC
C/O JESSICA TRAVIS
121 NANTASKET AVE
HULL, MA 02045

HULL ARTISTS
121 NANTASKET AVE
HULL, MA 02045

GIBSON FAMILY TRUST P AND C
369 WINTER STREET
HANOVER, MA 02339

Exhibit E

Sean Power Resume



Contact

www.linkedin.com/in/seanpowerin

karmadata.com

www.karmadata.com

www.prescribewellness.com

wgc.com

Top Skills

Oracle

.NET

C#

Sean Power

CEO, karmadata | Vice Chairman, PrescribeWellness
Hingham

Summary

I am a serial technology entrepreneur and investor, with extensive experience in big data and APIs. I founded karmadata in 2010 as a platform to enable the rapid creation of disruptive products and services. The karmadata cloud contains the largest repository of linked open data, standardized using our proprietary technology. Our API supports tens of thousands of users with millions of queries each day. We offer private cloud instances, and have helped launch several highly successful high growth businesses including PrescribeWellness and WCG Clinical Insight.

As Vice Chairman of PrescribeWellness I am tasked with board level oversight of all technology infrastructure and development. The company's CTO and CISO report directly to me, and I provide advice and guidance to them as they build our technology platform. My operational duties are primarily around data discoveries to help drive success for our patients, pharmacies and other healthcare partners. My journey with PrescribeWellness started in 2012 as an investor, and as the company started to accelerate I joined as co-founder in 2013. In 2016 I accepted the position of Vice Chairman of the board of directors.

In 2000, I co-founded Infinata one of the earliest Software as a Service providers. We created several successful products in the healthcare and financial services sectors, including BioPharm Insight. Infinata grew from a 2-person start-up in my partner's living room to one of the fastest growing information companies in the market, with over 500 corporate clients and tens of thousands of users.

In 2007, the Financial Times acquired Infinata and BioPharm Insight as a key part of a strategy to diversify into subscription based online revenue streams.

Specialties: Founding companies, hard work, listening to others, creating new things.

Experience

karmadata

CEO

September 2010 - Present (10 years 2 months)

Hingham, MA, USA

Connecting the world's healthcare data.

PrescribeWellness

Vice Chairman, Co-Founder

January 2013 - Present (7 years 10 months)

Irvine

Preventative care as a service. Cloud based patient engagement technology.

WIRB-Copernicus Group

Director

April 2016 - Present (4 years 7 months)

Mergermarket

Managing Director

September 2007 - May 2010 (2 years 9 months)

Infinata

President, Co-Founder

April 2000 - May 2010 (10 years 2 months)

Biopharm Insight

Founder / President

January 2000 - May 2010 (10 years 5 months)

Putnam Investments

Analyst

January 1999 - April 2000 (1 year 4 months)

Corporate Development

Ernst & Young

Senior Consultant



1995 - 1999 (4 years)

Entrepreneurial Services, Biotech / Pharma, Financial Services

Education

Boston College

BS, Finance, Accounting · (1991 - 1995)

Exhibit F

Jeffrey Shaheen Resume

Jeffrey P. Shaheen

SUMMARY

As the past Union Representative for Local 26 at Fenway Park for the past 18 years I had the privilege of representing some of the most disproportionately affected people in MA, regardless of their race, ethnicity, background, sex or religion. It was my responsibility to ensure all employees could work with dignity and respect while earning a fair wage through contractual negotiations with Aramark and the Red Sox. Community outreach, helping others, mentoring and giving back are passions I am constantly in pursuit of.

EXPERIENCE

Senior Union Representative, Local 26 Fenway Park — 2005-2019

As Senior Union Representative at Fenway Park it was my honor and duty to represent over 1400 Aramark employees in contract negotiations. Other responsibilities were to ensure the Red Sox and Aramark provide a safe work environment, a place where all employees could work with dignity and respect while earning a fair wage and in representing all employees in contractual and disciplinary matters.

Executive Host, Fenway Park, Boston MA — 2003-Present

As a Senior Executive Host at Fenway Park it was my responsibility to ensure all guests, season ticket holders, Corporate suites and special events exceeded client expectations.

President, World Intel Networks, Boston MA — 2006-2015

Co-owned and operated national telecommunications consulting company with a focus on streamlining, updating and enhancing technology for Fortune 5000 companies with a focus on medical and banking infrastructure.

President, Apollo Place Condominiums, Hull, MA — 2013-Present

A boutique multi use condominium association property located in the Nantasket Beach Overlay or Marijuana Overlay district. Responsible for ensuring all aspects of Condominium Trust articles are adhered to and that the property is run impeccably and efficiently for Trustees and guests.

EDUCATION

Social Equity Program, Cannabis Control Commission, MA-Present

Quincy College, Quincy MA — Liberal Arts Degree, 1995

Hull High, Hull MA-1988

1 Porrazzo Rd., Hull, MA
781-308-1109
jeffreysaheen@gmail.com

Exhibit G

Mike Grasso Resume





Michael R. Grasso

7 Raceway Dr. Nantucket, MA - 781-635-3633 - MikeGrasso0@gmail.com

SUMMARY

Management, Strategic Direction, Writing, Content Production.

A positive, productive and experienced team member with a uniquely successful management style. Driven to create and enthusiastically meet production goals and foster successful working relationships with clients and co-workers. Professional network partnership cultivator.

EXPERIENCE

Owner, Founder

Grasso Cannabis Business Development
Nantucket, MA 2019 - Present grassocbd.com

Director of Operations

The Green Lady Dispensary
Nantucket, MA 2018 - 2019 thegreenladydispensary.com


- Directed design and construction of vertically integrated cultivation, concentrate processing, marijuana infused product and dispensary facilities
- Managed and supervised the purchasing, logistics and placement of all cannabis cultivation, production and retail equipment and software
- Created and executed commercial cannabis cultivation, concentrate production and infused product production plans including staffing
- Managed compliance and oversaw state inspection process ensuring successful procurement of recreational adult-use cannabis licenses
- Delivered 500k + in revenue from retail opening in under 25 days

News Editor

Motor Trend Group, The Four Wheeler Network
Los Angeles, CA 2017 - 2018 motortrend.com

- Network News Editor for TEN's Automotive Media Division
- Managed and responsible for the production and editing of staff and freelance digital media and content for TEN's Truck and Off-Road group, 13 total brands in [The Four Wheeler Network](http://TheFourWheelerNetwork) and [The Truck Trend Network](http://TheTruckTrendNetwork)

SKILLS

- Experienced in Public Relations, Journalism, Media Production, Marketing, Editing, Blogging, Professional Networking, Hiring and Staff Management
 - Professional skills in Developed Equipment Procurement and Logistics Management
 - Experienced with Cannabis Compliance Software & METRC
 - Microsoft Office Suite, WordPress, WriterDuet, Google Suite, Adobe Creative Suite, and Google AdWords proficient .
 - Experienced on all Social Media and Social Networking Platforms
- 

Marketing Coordinator

Weave IQ

Boulder, CO 2017 weaveiq.com - [@weaveiq](https://twitter.com/weaveiq)

- Built social presence and expanded reach by optimizing media channels
- [Created compelling, original digital marketing content](#)
- Enhanced SEO and introduced Google Adwords program
- Assisted in B2B and B2C marketing strategy development
- Coordinated successful sales meetings with 100+ CO cannabis businesses

Media Director & Sales Representative

Colorado Healing LLC

Boulder, CO 2016 - 2017

- Developed social media marketing initiatives including: integration of professional photography, mutually beneficial industry collaboration, demographic customer targeting, and in-app search engine optimization across multiple platforms
- Developed compliant advertising techniques for cannabis businesses
- Assisted with product development, regulated production, compliance, wholesale and retail sales, and medical & recreational retail management

Writer, Producer & Creative Director - Highly Productive

Wrong Creative

A 2016 MerryJane.com Original Series

[Watch Episode One - Lagunitas](#)

- Created the concept for the MerryJane.com original series Highly Productive, funded by Snoop Dogg
- Coordinated with Wrong Creative founders Doug Porter and Austin Simons on the development and production of the series
- Consulted for and assisted with on-site production of [the first episode](#) with Lagunitas Brewery founder Tony Magee and the following five episodes
- Received positive feedback from [Forbes](#), [LA Weekly](#), and [Playboy](#)

Writer & Online Editor

TransWorld Media

Boulder, CO 2012-2013 - Carlsbad, CA 2013-2015

snowboarding.transworld.net - transworldbusiness.net

- Editorial Assistant at TransWorld Business Magazine 2012-2013
- Appointed Remote Online Editor for TransWorld Snowboarding 2013
- Assisted in collaborative development of published print and digital content
- Assisted in content development for partnership advertising collaborations
- Wrote and edited internationally published print articles for monthly TransWorld Snowboarding and TransWorld Business print issues
- Co-directed TWSnow.com web content with audience of over 1.7 million
- Wrote and published five hundred plus TWSnow digital articles
- Assisted editors with collaborative media, social media marketing, event coordination and management, and product testing and review

REFERENCES

Mike Lewis, Brand Director
Zeal Optics - Boulder, CO
Former EIC, TransWorld Business
MLewis@zealoptics.com
(303) 396-0311

Nick Hamilton, Content Director
TransWorld Snowboarding
Carlsbad, CA
nick.hamilton@transworld.net
(760) 707-1966

Garrett Cropsey, Business Manager
Colorado Healing LLC
Boulder, CO
garrettcropsey@gmail.com
(413) 262-1155

Tabor Coates, Owner
Eastern Boarder
Worcester, MA
tabor@easternboarder.com
(508) 852-3668

Monica Gonderman, Senior Editor
MotorTrend : Truck & Off Road
El Segundo, CA
mgonderman@enthusiastnetwork.com
Phone: (310) 408-8826

EDUCATION

University of Colorado Boulder B.A.
in Communication
Focus in Marketing and Journalism
Class of 2015

Exhibit H

Operating Agreement Latitude 42 Therapeutics LLC



**OPERATING AGREEMENT
OF
LATITUDE 42 THERAPEUTICS, LLC**

This Operating Agreement (this "Agreement") of Latitude 42 Therapeutics, LLC (the "Company"), is made as of December 27, 2019, by and between the Company and Sean Power, as the sole initial Member.

**ARTICLE ONE
FORMATION AND PURPOSE**

1.1 Formation. The Member acknowledges the Company's formation as a limited liability company under the Massachusetts Limited Liability Company Act (the "Act") pursuant to a Certificate of Organization filed with the Secretary of the Commonwealth of the Commonwealth of Massachusetts on December 4, 2019.

1.2 Purpose. The business of the Company is to: (i) apply for a license with the Massachusetts Cannabis Control Commission; (ii) establish, own, operate, and manage a business pursuant to such license with the Massachusetts Cannabis Control Commission; and (iii) engage in any activities directly or indirectly related or incidental thereto for which limited liability companies may be organized under the Act.

1.3 Tax Classification. The Member intends that the Company be classified as a partnership for federal income tax purposes whenever there is more than one Member and as a so-called "disregarded entity" whenever there is only one Member, and this Agreement shall be interpreted in a manner consistent with such intent.

1.4 Limited Liability. No Member or Manager shall be obligated personally for any debt, obligation or liability of the Company solely by reason of being a Member or acting as a Manager except as otherwise provided by law.

**ARTICLE TWO
MEMBERS**

2.1 In General. The term "Member" means the undersigned and any other Person subsequently admitted as a Member pursuant to this Agreement. The term "Person" includes any natural person and any legal entity. A Person ceases to be a Member immediately upon the Assignment of such Person's entire membership interest in the Company.

2.2 Member List. The Company shall maintain at an office regularly used for conducting the Company's business and affairs a current list of all Members and Assignees (the "Member List") which includes, as applicable, each such Member's or Assignee's name, address and percentage interest. A copy of the Member List as of the date of this Agreement is attached as Exhibit A.

2.3 Approval or Consent of Members. Each Member shall be given five (5) days written notice, which may be waived, before any vote is taken on a matter requiring the approval

or consent of the Members. Each Member shall have a vote equal to such Member's percentage interest.

2.4 Admission of a Member. Any Person, other than an undersigned Member, who acquires an interest in the Company by Assignment or otherwise shall not become a Member until (i) such Person's admission as a Member has been approved by a majority in percentage interest of the Members, (ii) such Person has executed this Agreement as then existing, and (iii) such Person makes any required capital contribution.

2.5 Resignation of a Member. Each Member agrees not to resign or otherwise withdraw from the Company unless such Member's entire membership interest in the Company is assigned or purchased in a manner permitted by this Agreement.

ARTICLE THREE MANAGEMENT

3.1 Management by Manager. The Company shall be managed by one or more Managers. If at any time more than one Manager exists, the approval of a majority of such Managers shall be required to act or to refrain from acting. The term "Manager" means all Managers then serving in such capacity pursuant to this Article Three.

3.2 Powers of Manager. Except as otherwise set forth in this Agreement, the Manager shall have the entire right, duty and power to manage and control the business and affairs of the Company without restriction.

3.3 Binding the Company. Any person or persons dealing with the Company may rely conclusively upon a certificate or other writing signed by the Manager which states that a specific action of the Manager on behalf of the Company is being taken with the consent of a majority in percentage interest of the Members.

3.4 Designation of Manager. Scan Power is designated as the initial Manager of the Company. If the initial Manager, Scan Power, ceases to be a Manager hereunder, the vacancy in the office of Manager shall be filled by a Person appointed by a majority in percentage interest of the Members.

3.5 Tenure of Manager. A majority in percentage interest of the Members may remove a Manager at any time. The term of a Manager shall expire upon such Person's death, permanent incapacity, bankruptcy, resignation or removal.

3.6 Compensation. A Manager may receive such compensation as such Manager and a majority in percentage interest of the Members agree.

ARTICLE FOUR RELATIONSHIP AMONG MEMBERS AND MANAGERS

4.1 Liabilities of Members and Managers. Except for the contractual obligations of the Members and the Managers which arise under this Agreement or otherwise, no Member or Manager shall have any liability to the Company arising out of a transaction, occurrence or

course of conduct unless such Member or Manager engaged in willful misconduct or a knowing violation of the criminal law.

4.2 Dealings with the Company. The Manager may engage the services of or may cause the Company to transact business with (i) any Member or Manager, (ii) any Person who is related to or affiliated with any Member or Manager, (iii) any Person having a financial interest in any Member or Manager, or (iv) any Person in which a Member or Manager has a financial interest. The provisions of any contracts with any such Person shall not be less favorable to the Company than those which generally could be obtained from an unrelated or unaffiliated Person.

4.3 Other Activities. A Member or Manager may engage in or hold an interest in any other business even if such business competes with the Company. Neither the Company nor a Member or Manager shall have any rights in such business or its profits. Each Manager who engages in such business or acquires such interest shall inform the Members and any other Manager of any material conflict of interest with the Company which results from such business or interest.

4.4 Expenses and Reimbursement. The Company shall bear all expenses and liabilities incurred with respect to the organization, operation and management of the Company. Each Member and Manager shall be reimbursed by the Company for any expense or liability incurred by such Member or Manager on behalf of the Company; provided, however, that no expense or liability arising from such Member's or Manager's willful misconduct or knowing violation of the criminal law shall be reimbursed.

ARTICLE FIVE ASSIGNMENTS

5.1 In General. Except as otherwise provided in this Agreement, no Member shall sell, assign, give, encumber or otherwise transfer any interest in the Company (an "Assignment") without the prior written consent of the Manager and a majority in percentage interest of the Members. The term "Assignor" means any Person who assigns an interest in the Company in accordance with this Article Five. The term "Assignee" means the owner, other than a Member, of any interest in the Company assigned in accordance with this Article Five. An Assignee may become a Member only in the manner specified in this Agreement.

5.2 Permitted Assignments. The term "Permitted Assignment" means an Assignment of an interest in the Company to a Member, the spouse of a Member, an ancestor or descendant of a Member, the spouse of an ancestor or descendant of a Member, an entity in which any such individual holds substantially all of the equity interests, or a trust established primarily for the benefit of any such individual. A Member may make a Permitted Assignment at any time without the prior written consent of other Members.

5.3 Certain Assignments Prohibited. Notwithstanding any other provision of this Agreement, no Assignment shall be permitted if such Assignment would result in a termination of the Company for federal income tax purposes or would violate any law or judicial order, including, without limitation, the Act. An Assignment not made in accordance with this Agreement shall be void ab initio.

5.4 Status and Liability of Assignor. A Person making an Assignment in accordance with Section 5.1 or 5.2 shall be considered an Assignor, not a Member, to the extent of such Assignment. An Assignor, to the extent of such Assignment and whether or not a Member, shall not have the rights of a Member and shall not be relieved of liability under this Agreement (including the obligation to restore the amount in a Capital Account) until a majority in percentage interest of the Members consent.

5.5 Rights of Assignee. An Assignment entitles the Assignee, to the extent assigned, to the Capital Account and the percentage interest of the Assignor. An Assignment does not entitle the Assignee, whether or not a Member, to participate in the management of the Company's business and affairs or to become a Member, to the extent of the Assignment, until a majority in percentage interest of the Members approve.

ARTICLE SIX CAPITAL

6.1 Capital Accounts. The Company shall maintain a capital account ("Capital Account") for each Member. The value of each Capital Account shall equal (i) the sum of all cash contributed to the Capital Account, the value (as agreed upon by the owner of the Capital Account and a majority in percentage interest of the Members) of any property contributed to the Capital Account, and the share of the Company's profits allocated to the Capital Account minus (ii) all distributions made to the owner of the Capital Account and the share of the Company's net losses allocated to the Capital Account. Each Capital Account shall be maintained in accordance with the United States Internal Revenue Code of 1986, as amended (the "Code") and shall not bear interest.

6.2 Capital Contributions. The amount of each Person's capital contributions shall be determined at the time such Person is admitted as a Member.

6.3 Additional Contributions and Loans. Except as otherwise provided in this Agreement, no Person shall be required to contribute or lend money or property to the Company.

6.4 Return of Capital. No Person shall be entitled to the return of any part of such Person's Capital Account.

6.5 Loans Not Capital Contributions. A loan to the Company shall not be considered a capital contribution.

ARTICLE SEVEN ALLOCATIONS AND DISTRIBUTIONS

7.1 Profits and Losses. Except as otherwise provided in a written instrument executed by all of the Members, the Company's profits and losses shall be allocated to or deducted from each Member's Capital Account at least annually in accordance with such Member's percentage interest.

7.2 Operating Cash Distributions. Except as otherwise provided in a written instrument executed by all of the Members, cash which the Manager determines is not necessary

for the Company's operations or reserves shall be distributed to the Members and their assignees at least quarterly and in accordance with their percentage interests.

7.3 Distributions upon Dissolution. Following the dissolution of the Company and the winding up of its business and affairs, the Company's assets shall be distributed:

- i. first, to satisfy the Company's debts and obligations;
- ii. second, to establish any reserves deemed appropriate by the Manager and a majority in percentage interest of the Members; and
- iii. third, except as provided in a written instrument executed by all of the Members, to the Members in accordance with their percentage interests.

ARTICLE EIGHT TAX MATTERS

8.1 Tax Allocations. Except as otherwise required under the Code, the Company shall allocate its tax items in the same manner as its book items.

8.2 Tax Matters. The Company's tax year shall be the calendar year. The Manager may make, refrain from making or revoke all tax elections under the Code. The Manager shall designate a "Partnership Representative" if required by the Code or such other designations as the Code may require from time to time.

ARTICLE NINE DISSOLUTION

9.1 Events of Dissolution. The Company shall be dissolved upon the earlier of:

- i. the consent of a majority in percentage interest of the Members; or
- ii. the occurrence of any event requiring a dissolution pursuant to the Act; provided, however, that in the event of the death or legal incapacity of the Member, his legal representative shall be the assignee of the Member's interest and shall thereafter be deemed the Member for purposes of this Agreement without the need for any further action by the Manager or the Company.

9.2 Winding Up and Termination. The Company's business shall be wound up following its dissolution. The Company shall terminate once the winding up has been completed.

ARTICLE TEN INDEMNIFICATION

10.1 Indemnification in General. The Company shall indemnify any Member or Manager who was or is a party to any threatened, pending or completed action, suit, arbitration or proceeding, whether civil, criminal, administrative or investigative, and whether formal or

informal (a "Proceeding"), including a Proceeding brought on behalf of the Member, because such Person was or is a Member or Manager or was or is serving at the request of the Company as a manager, director, trustee, partner or officer of another entity, against any liability and reasonable expenses (including reasonable attorneys' fees) incurred by such Person in connection with such Proceeding unless (i) such Person has engaged in willful misconduct or a knowing violation of the criminal law or (ii) such Proceeding is to enforce contractual obligations of a Member or Manager under this Agreement or otherwise. No amendment of this Article 10 shall have any effect on the rights provided in this Article with respect to any act or omission occurring prior to such amendment.

10.2 Advances and Reimbursements. The Company promptly shall make advances or reimbursements for reasonable expenses (including attorneys' fees) incurred by any Person claiming indemnification under this Article 10 unless the Company determines that such Person is not entitled to indemnification pursuant to Section 10.1. Such advances or reimbursements shall not be made unless the Person claiming indemnification agrees in writing to repay such advances or reimbursements if the Company ultimately determines that such Person is not entitled to indemnification pursuant to Section 10.1.

10.3 Evaluation of Indemnification Claim. The scope and reasonableness of any claim for indemnification under this Article 10 shall be evaluated by the Members, if the claimant is not a Member, or by legal counsel jointly selected by the claimant and the remaining Members, if otherwise. This evaluation may be performed before or after a claim for indemnification is made.

10.4 Indemnification Prohibited. No Person shall be entitled to indemnification under this Article 10 to the extent such Person is entitled to indemnification by any other person or entity (including any insurer).

ARTICLE ELEVEN ADMINISTRATIVE PROVISIONS

11.1 Offices. The Company's registered agent and registered office shall be as set forth in the Company's Certificate of Organization (as the same may be amended and/or amended and restated from time to time). A majority in percentage interest of the Members or the Manager may change the registered agent, the registered office or the principal office at any time.

11.2 Books and Records. The Manager shall keep full and accurate books of account and records at an office regularly used for conducting the Company's business and affairs. Upon reasonable notice, any Member or such Member's designated representative shall have access to such books and records during reasonable business hours and may inspect and make copies of them at such Member's expense.

11.3 Notices. Notices and communications given pursuant to this Agreement (including approvals or consents of the Member) shall be in writing and shall be delivered by hand, facsimile, commercial courier or registered or certified mail (return receipt requested and postage prepaid) to the addressee in person or to the address of the addressee as then shown on

the Member List, if the addressee is a Member or an Assignee, and to the principal office of the Company, if the addressee is the Manager. All such notices, except notices given by mail, shall be deemed to have been received when delivered, if delivered during business hours, or on the next business day following delivery, if not delivered during business hours. Notices given by mail shall be deemed to have been given on the earlier of (i) the date shown on the return receipt or (ii) five days after being deposited in the United States Mail.

ARTICLE TWELVE MISCELLANEOUS

12.1 Amendment. This Agreement may be amended from time to time by a majority in percentage interest of the Members.

12.2 Interpretation. Unless the context otherwise requires, any term used but not defined in this Agreement shall have the meaning set forth in the Act.

12.3 Power of Attorney. Each Member by this Agreement appoints the Manager as such Person's true and lawful attorney-in-fact to execute, acknowledge, deliver or file any certificate or other document required by law to be filed by the Company with any governmental agency.

12.4 No Third Party Beneficiaries. No provision in this Agreement, including any provision requiring Members or Assignors to restore Capital Account deficits, shall affect the Members' and the Assignors' insulation from personal liability for Company debts as provided for in the Act. No provision of this Agreement shall inure to the benefit of, or be enforceable by, any third party (including any creditor of the Company or of any Member).

12.5 Governing Law. This Agreement shall be governed by the laws of the Commonwealth of Massachusetts without regard to its choice or conflict of laws rules.

12.6 Evidence of Membership Interests. This Agreement and the Member List attached as Exhibit A shall constitute the sole evidence that any Person owns a membership interest in the Company.

[Remainder of page intentionally left blank; signature page follows]

IN WITNESS WHEREOF, the undersigned have executed this Agreement as of the date first set forth above.

Company:

LATITUDE 42 THERAPEUTICS, LLC

By: *Sean Power*
Sean Power, Manager

Member:

Sean Power
Sean Power (individually)

Exhibit A

MEMBER LIST OF
LATITUDE 42 THERAPEUTICS, LLC

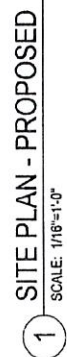
AS OF DECEMBER 4, 2019

Name and Address	Percentage Interest
Sean Power 12 Crest Road Hull, MA 02045	100%

Exhibit I

Proposed Site Plan

Site/Floor Plans



SCALE: 1/16"=1'-0"

Exhibit J

Existing Condition Survey

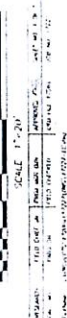


Exhibit K

Deed and Legal Existence Certificate Latitude 42 Real Estate LLC



2019 00793438

Bk: 648 Pg: 31 Cert: 129631
Doc: DEED 12/23/2019 12:53 PM
ATTEST: John R. Buckley, Jr. Register
Plymouth County Registry of Deeds

MASSACHUSETTS EXCISE TAX
Plymouth District ROD #11 001
Date: 12/23/2019 12:53 PM
Ctrl# 131398 18027 Doc# 00793438
Fee: \$4,104.00 Cons: \$900,000.00

CANCELLED

QUITCLAIM DEED

D.J. & Nick Enterprises, LLC, a Delaware limited liability company, having an address c/o Robelle Industries, Inc., 60 Campanelli Drive, Braintree, MA 02184 ("Grantor") for consideration paid of Nine Hundred Thousand and 00/100 Dollars (\$900,000.00) grants to Latitude 42 Real Estate, LLC, a Massachusetts limited liability company, with an address of 12 Crest Road, Hull, MA 02045, with **QUITCLAIM COVENANTS** the land, with the buildings and improvements thereon, commonly known and numbered as 120 Nantasket Avenue, Hull, Plymouth County, Massachusetts, as more particularly described on Exhibit A attached hereto and incorporated herein (the "Property").

The Property is conveyed with the benefit of and subject to all easements, restrictions and other agreements currently of record or entered into in connection with any zoning exception or special permit, so far as the same may be in force and effect.

The transfer is in the Grantor's ordinary course of business.


For title reference see deed filed with the Plymouth County Registry District of the Land Court as Doc. #668849 on Certificate of Title No. 115201.

[REMAINDER OF PAGE BLANK; SIGNATURE(S) ON NEXT PAGE]

Property Address: 120 Nantasket Avenue, Hull, MA

EXECUTED as an instrument under seal as of this 26 day of December, 2019.

D.J. & NICK ENTERPRISES, LLC

By: 
Name: Jay Hanflig
Title: Manager

COMMONWEALTH OF MASSACHUSETTS

Norfolk, ss

On this 18 day of December, 2019, before me, the undersigned notary public, personally appeared Jay Hanflig, proved to me through satisfactory evidence of identification which was personal knowledge, to be the person whose name is signed on the preceding or attached document and acknowledged to me that he signed it voluntarily for its stated purpose in my presence as the Manager of D.J. & Nick Enterprises, LLC, as the voluntary act of D.J. & Nick Enterprises, LLC.



Notary Public
My commission expires: October 14, 2022
Lisa J. Delaney

EXHIBIT A

Real property in the City of Hull, County of Plymouth, Commonwealth of Massachusetts,
described as follows:

Parcel I:

Lot 5 on subdivision plan #2595K, drawn by Francis McHugh, Surveyor, dated September 10,
1973, filed with Certificate of Title No. 47859.

Parcel II:

Non-exclusive right of way over the way as approximately shown on plan #2595A to Nantasket
Beach Avenue (now known as State Park Road) as set forth in a deed given by Jonathan L.
Damon to Joseph Vaughan, dated August 17, 1868 recorded in Book 367, Page 237.



William Francis Galvin
Secretary of the
Commonwealth

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

December 9, 2019

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

D.J. & NICK ENTERPRISES, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **December 28, 2001**.

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: **JAY HANFLIG, DONNA SINDEN**

I further certify that the name of persons authorized to act with respect to real property instruments listed in the most recent filings are: **DONNA SINDEN, JAY HANFLIG**

In testimony of which,

I have hereunto affixed the

Great Seal of the Commonwealth

on the date first above written.

A handwritten signature in cursive script, reading "William Francis Galvin".

William Francis Galvin

Secretary of the Commonwealth

Doc 00793438

Plymouth County LAND COURT
Registry District

RECEIVED FOR REGISTRATION

On: Dec 23, 2019 at 12:53P

Document Fee 125.00

Receipt Total: \$4,294.00

NOTED ON: CERT 129631 BK 00648 PG 31

ALSO NOTED ON: CERT 115201 BK 576 PG 1

\$12,100

2) \$4,100



William Francis Galvin
Secretary of the
Commonwealth

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

October 21, 2020

TO WHOM IT MAY CONCERN:

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

LATITUDE 42 REAL ESTATE, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **November 25, 2019.**

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; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; and that said Limited Liability Company is in good standing with this office.

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

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

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



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



William Francis Galvin
Secretary of the
Commonwealth

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

October 21, 2020

TO WHOM IT MAY CONCERN:

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

LATITUDE 42 REAL ESTATE, LLC

in accordance with the provisions of Massachusetts General Laws Chapter 156C on **November 25, 2019**.

I further certify that said Limited Liability Company has not filed a certificate of cancellation; that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156C, § 70 for said Limited Liability Company's dissolution; and that, so far as appears of record, said Limited Liability Company has legal existence.



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

Exhibit L

Security Plan



October 20th , 2020

Security Narrative

Proposal Prepared for
Latitude 42 Therapeutics, LLC
120 Nantasket Avenue
Hull, MA 02045

Report Status: [Draft Report]

Daniel Linskey
Managing Director
Security Risk Management
Daniel.linskey@kroll.com

125 High Street 30th Floor, Boston, Mass 02136
| M +1 857.275.2510

kroll.com

Private & Confidential

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I represent Latitude 42 as their security consultant. I am submitting the following proposed security plan on behalf of LATITUDE 42. These plans were developed in accordance with 935 CMR 500.000 Cannabis Control Commission regulations, Town of Hull Ordinances, and industry best practices using the principles of Crime Prevention Through Environmental Design (CPTED), and my 33+ years of law enforcement and security experience. I have provided security consulting services for the past years to numerous clients in various industries including cannabis companies in Massachusetts.

Our proposal is to locate a marijuana cultivation and medical Establishment at 120 Nantasket Avenue Hull, MA 02045. I believe that the security plan for LATITUDE 42 outlined below meets all the requirements of the town of Hull and will ensure a minimal impact on public safety services of the City of Waltham .

The security system for LATITUDE 42 dispensary in Hull, MA is designed to provide a safe and secure environment for staff, the public, and storage/handling of marijuana in compliance with Code of Massachusetts Regulations 935 CMR 500.110.

Kroll also considered security principles of Crime Prevention Through Environmental Design (CPTED), Concentric Circles of Protection, and Integrated Design when evaluating opportunities to deter a threat from entering and circulating within the building envelope. CPTED is a concept that utilizes planned passive resources, such as architectural barriers, landscaping, and lighting to reduce the necessity of traditional technical and operational security elements, to reduce vulnerability to crime. The key concepts of CPTED include: Natural Access Control: Use of doors, fences, landscaping, and other man-made and natural obstacles to limit access into the building or other defined interior space. Natural Surveillance: Increasing visibility by occupants and observers (security and staff) to increase the detection of unauthorized individuals or misconduct within a facility. Natural Boundary Definition: Establishing a sense of ownership by occupants to increase vigilance in identifying intruders. This sends the message that would-be-offenders will be identified.

The concept of "Concentric Circles of Protection" is based on varying levels of protection originating at the site perimeter, building perimeter, lobby areas, and interior areas with special control requirements and becoming increasingly more stringent as one proceeds through each level to reach the most critical areas. Intervention zones between each layer of the circle provide opportunities for control, detection, evaluation, and response to undesired activity, intruders, or other unauthorized individuals.

The Integrated Design Philosophy establishes effective security through the integration of electronic systems with architectural elements, enhanced by security staff and procedures. When the integration of these elements is effectively executed, a synergy is created that meets the desired security objective. The premise for using this concept is that architectural, operational and electronic elements must be implemented to complement one another; thereby creating collaboration between them that results in a strong security program. No one element of the group can stand-alone or operate independently and provide adequate protection. Specifics of the elements used include:

Architectural Security measures address items such as perimeter barriers, lighting, critical building services, spatial adjacencies, and control barriers.

Operational Security measures address items such as staff and public access control, staffing, monitoring, and administration of systems.

Electronic Security measures address items such as access control and alarm monitoring, video surveillance, and security communications.

Security Measures

Security measures for the LATITUDE 42 dispensary consist of both physical barriers and electronic systems that work in concert to provide a robust security program. These measures include:

Secure Door and Window Hardware

Security Mesh

Primary Intrusion Alarm System

Backup Intrusion Alarm System

Video Surveillance System

Access Control System

Door Interlock System

Door Intercom System

Physical Security Measures

Measures will be employed by LATITUDE 42 that ensure a secure physical perimeter is provided around their entire tenant space as well as walls surrounding the Secure Storage/Limited Access Area (LAA). Where concrete block construction is not used, security mesh and plywood will be utilized to harden ceiling and perimeter walls of the LAA to deter penetration from adjacent space.

Perimeter doors and designated interior doors separating dispensary functions will be provided with locking hardware which will remain secure except when accessed by authorized persons. Perimeter glass for the dispensary will be limited. All perimeter glass will be non-operable and will have laminated glass or security mesh inside to prevent intrusion. Security personnel will validate persons before they are permitted to enter the facility and then again to enter the sales showroom.

Intrusion Alarm Systems

Intrusion detection for the LATITUDE 42 dispensary is comprised of two independent commercial-grade alarm systems – a primary and a backup – to ensure any intrusion will be detected and reported should a failure of either system occur. The primary alarm system (PAS) and the backup alarm system (BAS) will be installed, serviced, and monitored by separate security vendors to ensure redundancy. Control equipment for the PAS and BAS will be located in the Security Room, which will have restricted access.

Perimeter detection of an intrusion is provided using door contacts on perimeter doors and glass break detection for perimeter glass. Interior intrusion detection is provided by motion detection throughout the dispensary and in the LAA. In addition to intrusion devices, hold-up/panic alarms will be provided at point of sale locations within the sales area, in the Security Room and in the LAA. The intrusion alarm systems will be controlled by numeric keypad arming stations located inside the main entry and exit doors. Keypads will display system armed/disarmed status, status of security devices and any trouble notifications. Authorized users will be issued unique arm/disarm codes to identify who armed or disarmed the systems at a given time. A special duress alarm code will be provided at each PAS and BAS keypad arming station to notify law-enforcement that an authorized user has been forced by an intruder to disarm an alarm system.

The PAS and BAS provide separate detection of intrusion for all perimeter door and window contacts, glass break detectors, and motion detectors to ensure a device failure on one system will not compromise intrusion detection by the other. Both systems will have backup batteries for continued operation during power failures for up to twenty-four hours.

Video Surveillance System

The video surveillance system (VSS) is comprised of network-based video cameras and network-based head-end equipment for viewing, recording and playback of security video. VSS head-end equipment will be located in the Security Room to ensure access is restricted and limited to the security function. Exterior cameras will be located around the perimeter of the building, at doors and the side driveway area to monitor and record activity around the dispensary tenant space. Interior cameras will be provided in dispensary areas and in the LAA. The system will provide monitoring and recording of all cameras to aid in identifying all who enter or exit the dispensary and areas where controlled products will be stored, processed, handled, and sold. Monitoring and operation of the VSS will be provided in the Security Room.

The VSS will retain camera footage for a minimum of 90 days and retain (at minimum) the last 24 hours for immediate retrieval and playback. The VSS will save or archive video relating to a particular incident under investigation or pending legal/administrative action for as long as necessary and export still images to industry standard formats. Additionally, the VSS will have an uninterruptible power source for continued operation during a power failure for a minimum of four hours or for thirty minutes should an emergency backup generator be provided for extended backup power.

Access Control System

A proximity card access control system (ACS) will be provided at the perimeter and designated interior doors, including the LAA door, to limit access only to persons issued a valid access card and within their allotted day and time schedule. Each person will be authorized to enter only those doors required in the performance of their duties. Persons accessing the LAA will be required to present a valid access card and enter a unique personally identifiable numeric code before entry is granted. All user activity will be logged by the ACS. Vandalizing or tampering with the ACS card reader on the unsecure side of a door will not unlock the door. The ACS controller will be located in the Security Room and be provided with backup power supply to ensure operation during a power failure for a minimum of four hours; or for thirty minutes in the event an emergency generator is provided for extended backup power.

All authorized personnel will be issued a photo ID badge that also acts as the card to access the controlled doors. Personnel names and photos will be printed on the card. All personnel will be required to wear their photo ID badge at all times while on the premises. The cards will employ contactless smartcard technology with unique card numbers. Only cards programmed into the ACS will work at the dispensary. The manufacturer will track the individual card numbers to ensure card

numbers are not duplicated. These card security measures will help ensure that only authorized personnel will have access to the dispensary facility. The access control system will also include a visitor management function that will record visitors to the dispensary facility, store personal information, and print visitor badges.

Door Intercom System

An intercom system is provided to allow Security Room personnel to communicate with persons at the Exterior Entry Vestibule door should the door be locked during business hours for any reason. The intercom system will allow the entry door to be remotely unlocked from the Security Room to allow vetted persons into the Entry Vestibule.

Door Interlock System

An exterior and interior door at entry and exit points of the dispensary form a vestibule which will be configured similar to a mantrap to ensure authorized persons entering or exiting cannot allow an unauthorized person into the dispensary Sales Floor. The interlocked doors are controlled such that only one vestibule door can be opened at a given time. Doors are logically controlled by a controller located in the Security Room. Door release buttons are provided at the reception desk for the entry doors to allow authorized persons to enter the Entry Vestibule, and once verified, will be allowed to enter the Sales Floor.

The exterior entry door is unlocked during business hours to facilitate access into the Entry Area. Once inside the Entry Vestibule, a person must check in at the Security Room transaction window. Once properly vetted, the security officer unlocks the interior Sales Floor door, which interlocks the exterior Entry Vestibule door. When the interior door is closed and locked, the exterior entry door is unlocked. After hours, the exterior Entry Vestibule door is locked by the ACS. The exterior Entry Vestibule door may be locked during business hours for additional security and vetted persons let in via the door intercom system.

When exiting the Sales Floor, a person pushes the exit bar to open the interior Sales Floor exit door. Once inside the Exit Vestibule, the interior Sales Floor door must be closed and secure before the exterior Exit Vestibule door can be opened to exit the building. While the exterior Exit Vestibule door is open, the interior Sales Floor door is interlocked to prevent it from being opened until the outer exit door is closed and secure. Note: The interlock door controls will be overridden as required by life-safety code.

Policies and Procedures

LATITUDE 42 Good Neighbor Agreement

Concerns have been raised in some communities that an adult use dispensary will create more open-air marijuana use in and around the area. Kroll notes that increased use in the area has not been the experience of other facilities. Any first-time visitor to the facility will have to sign a good neighbor pledge acknowledging the current laws and regulations regarding the use of cannabis. They will be provided with educational material that will inform them how to safely consume and store their purchases, as well as a warning that anyone found to violate the good neighbor agreement by consuming in public, diverting product to unauthorized persons, or engaging in impaired operation of a vehicle will be trespassed from the property. LATITUDE 42 will widely publish a quality of life complaint hotline that will be linked to the facility. If any residents see people engaged in illegal marijuana use in public in the area, they can call not only the Waltham Police but our hotline as well. LATITUDE 42 will make efforts to determine if the problem activity is being conducted by a client. If LATITUDE 42 becomes aware that someone has violated the terms of the good neighbor policy, such as by consuming the product in public, LATITUDE 42 will immediately trespass that individual and will list them as no longer being able to enter the LATITUDE 42 facility. LATITUDE 42 intends to coordinate with the Waltham Police Department to hire Waltham police officers on a detail / reimbursable overtime basis as needed.

Kroll's Operational Safety Program for Latitude 42

Kroll will ensure that the facility will exceed the State's standards for access control and cameras. There will be no queue line on the street. We have designed an internal area for customers to wait to get verified as eligible to enter the dispensary. LATITUDE 42 personnel will verify proof of age as an individual enters the facility. Upon entry the client will proceed to the security window where their ID will be scanned and checked again. LATITUDE 42 staff will also ensure the person has not previously been prohibited from entry for violation of our good neighbor agreement. Once a person is verified, they will be buzzed through the security door into the sales area. Upon selecting, the client will proceed to the check out where there will be a third verification of the person's ID. LATITUDE 42 staff will ensure that there is no loitering on the premises or surrounding area.

All finished marijuana products will be stored in a secure, locked safe or vault in such a manner as to prevent diversion, theft, and loss; LATITUDE 42 will keep all safes, vaults, and any other equipment or areas used for the production and / or storage of marijuana products securely locked and protected from entry, except for the actual time required to remove or replace marijuana.

LATITUDE 42 will ensure all locks and security equipment are in good working order and will prohibit keys, if any, from being left in the locks or stored or placed in a location accessible to persons other than specifically authorized personnel. LATITUDE 42 will limit access to combination numbers, passwords or electronic or biometric security systems to specifically authorized personnel.

Kroll will ensure that the outside perimeter of the Marijuana Establishment is sufficiently lit to facilitate surveillance, where applicable. In addition, all marijuana products will be kept out of plain sight and not visible from a public place without the use of binoculars, optical aids or aircraft. LATITUDE 42 will develop emergency policies and procedures for securing all product following any instance of diversion, theft, or loss, of marijuana and conduct an assessment to determine whether additional safeguards are necessary.

LATITUDE 42 will share the Marijuana Establishment's security plan and procedures with Waltham Police and Fire Departments and will periodically update them as needed if the plans or procedures are modified in a material way.

Cash Management Program

LATITUDE 42 will engage with a professional armoured vehicle service to pick up cash from the facility as needed as well as utilizing cashless ATM's and other financial APPs to limit and manage the cash on premises.

Security Related Policies

The Company will develop security-related policies and procedures in a written security manual. At minimum, the manual will include the development of the following policies:

- I. Marijuana Product Security
 - A. Safes and Vaults
 - B. Security Personnel
 - C. Security Signage
 - D. Video Image Protection and Retention
 - E. Exterior Perimeter Lighting
 - F. Inventory and Disposal
 - G. Physical and Electronic Security Maintenance

- II. Access Control in accordance with
 - A. Key and Access Code Control
 - B. Dispensary Facility Access
 - C. Client Access
 - D. Staff Only Areas (e.g., Break Room, Safe Room, Receiving area)
 - E. Security Officer Access (e.g., Security Room)
- III. Visitor Management
 - A. Definition of Authorized Visitor
 - B. Notification of Visitors in Advance
 - C. Visitor Identification Badge (creation, display, and return)
 - D. Visitor Log
 - E. Emergency Visitation Circumstance
- IV. Diversion, Theft, and Loss
 - A. Inventory (security aspects)
 - B. Identification
 - C. Reporting/Notification
 - D. Root Cause Analysis
 - E. Disposal of Marijuana
- V. Alarm Activation, Security Breach and System Failure
 - A. Identification
 - B. Reporting/Notification
 - C. Root Cause Analysis

The Company will develop policies to include the following security policies for a holistic approach to dispensary facility security:

- 1. Workplace Violence
 - a. Definitions and Typologies
 - b. Management's Role and Responsibilities
 - c. Assessment
 - d. Response to Current Violence
 - e. Response to Threats

- f. Investigation
- 2. Trespassing and Loitering
 - a. 94 C Statutes
 - b. Public Notification
 - c. Response Protocols
- 3. Weapons
 - a. Company Prohibitions
 - b. Signage

- 4. Bomb Threat
 - a. Bomb Threat Checklist
 - b. Evacuation Procedures
 - c. Search Procedures
 - d. Response Protocols
- 5. Sensitive Information Protection
 - a. Management's Role and Responsibilities
 - b. Sensitive Information Defined
 - c. Safeguarding Sensitive Information (e.g., Protected Health Information Credit Card)
 - d. Document Destruction
 - e. Clean Desk Policy
- 6. Staff Security Awareness
 - a. Management's Role and Responsibilities
 - b. New Employee Security Orientation
 - i. How staff contact security
 - ii. What information staff should report to security
 - iii. The importance of displaying and checking identification
 - iv. Procedures for preventing and responding to security breaches
 - v. Preventing, intervening, reporting and resolving workplace violence issues
 - vi. Staff role in crime prevention
 - vii. Reporting environmental safety and security issues
 - viii. Personal safety awareness

- ix. Confidential information and privacy issues
- x. On-Going Security Awareness Efforts
- xi. Security Policies
- xii. Security Responsibilities

7. Robbery Prevention and Response

- a. Use of Duress Alarms
- b. Compliance with Robber Demands
- c. Video Surveillance
- d. Employee Training

8. Cash Handling

- a. Acceptance of cash from clients
- b. Cash Storage
- c. Payments with cash

9. End of Day Checklist

- a. Secure All Protected Health Information (PHI) Storage Areas
- b. Secure Cash, Checks, and Credit Card Slip Storage Areas (i.e., Safe, cash boxes, etc.) or Transfer to Financial Institution
- c. Secure All Marijuana Storage Areas
- d. Secure All Interior Doors
- e. Inspect Restrooms for Unauthorized Persons

VI. Security Personnel

Although not specifically required in the regulations, the LATITUDE 42 dispensary facility will have at least one contracted security officer on-site during all hours that staff is on the premises. The Security Officer will be responsible for managing access, patrolling the dispensary facility, and verifying compliance with LATITUDE 42 security policies. LATITUDE 42 will develop written security post orders for Security Officers assigned to the dispensary facility. Post Orders are an essential document for Security Officers that provide guidance on expectations and instructions on performing security duties for each shift and each post.

The Post Orders establish:

- Role in Client Access
- Patrol Requirements (frequency, locations, etc.)

- Alarm Priorities and Response Requirements
- Duress/Panic/Hold-up Alarms
- Unauthorized Access
- Intrusion Alarms
- Failure Notification System
- Door/Lock Inspections
- Documentation (Daily Activity Reports and Incident Reports)
- End-of-Day Inspections
- The Security Officer will be armed and equipped with a radio, flashlight, and cold weather gear.

VII. LATITUDE 42 will provide training to include Security Policies, dispensary facility characterization, security post orders, systems training

Crisis Intervention

Security Risk Management

Effective Communications

Security Awareness

Use of Force

Alarm System Fundamentals

Defensive Tactics and Officer Safety

VIII. Product Delivery

The Company will only accept deliveries from vendors at pre-arranged days and times and only when a proper shipping manifest has been sent to LATITUDE 42 at least 24 hours before the delivery.

IX. Incident Reporting.

LATITUDE 42 shall notify appropriate law enforcement authorities and the Cannabis Control

Commission of any breach of security immediately or, at most, within 24 hours following discovery of the breach. Notification shall occur during, but not be limited to, the following occasions:

Discovery of discrepancies identified during inventory.

Diversions, theft or loss of any marijuana product.

Any criminal action involving or occurring on or in the Marijuana Establishment premises.

Any suspicious act involving the sale, cultivation, distribution, processing, or production of marijuana by any person.

Unauthorized destruction of marijuana.

Any loss or unauthorized alteration of records related to marijuana.

Any alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the Marijuana Establishment.

The failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours; or

Any other breach of security.

LATITUDE 42 shall, within ten calendar days, provide notice to the Cannabis Control Commission of any incident described in 935 CMR 500.110(7)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified. All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(7)(a) shall be maintained by LATITUDE 42 for not less than one year or the duration of an open investigation, whichever is longer, and made available to the Cannabis Control Commission and law enforcement authorities upon request.

X. Security Audits

LATITUDE 42 will, on an annual basis, obtain at its own expense a security system audit by a vendor approved by the Commission. A report of such audit will be submitted, in a form and manner determined by the Commission, no later than 30 calendar days after the audit is conducted. If the audit identifies concerns related to the establishment's security system, LATITUDE 42 will submit a mitigation plan within ten business days of submitting the audit.

XI. Packaging of Edible Marijuana Products

Any edible marijuana product that is made to resemble a typical food or beverage product will be packaged and labeled as required by M.G.L. c. 94G, § 4(a½) (xxvi) and 935 CMR 500.105(5).

LATITUDE 42 will not offer for sale edibles in the distinct shape of a human, animal, or fruit, or a shape that bears the likeness or contains characteristics of a realistic or fictional human, animal, or fruit, including artistic, caricature, or cartoon renderings. LATITUDE 42 will ensure all edible marijuana products are prepared, handled, and stored in compliance with the requirements in 935 CMR 500.105(3) and 500.105(11).

Per 935 CMR 500.150(3), in addition to the requirements set forth in M.G.L. c. 94G, § 4(a½) (xxvi) and 935 CMR 500.105(5) and (6), LATITUDE 42 will ensure that the following information or statement is affixed to every container holding an edible marijuana product: If the retail edible

marijuana product is perishable, a statement that the edible marijuana product must be refrigerated. The date on which the edible marijuana product was produced. A nutritional fact panel that must be based on the number of THC servings within the container. Information regarding the size of each serving for the product by milligrams, the total number of servings of marijuana in the product, and the total amount of active THC in the product by milligrams (mgs). For example: "The serving size of active THC in this product is X mg(s), this product contains X servings of marijuana, and the total amount of active THC in this product is X mg(s)."

A warning that the impairment effects of edible marijuana may be delayed by two hours or more. LATITUDE 42 will ensure that each single serving of an edible marijuana product is physically demarked in a way that enables a reasonable person to intuitively determine how much of the product constitutes a single serving of active THC. Each serving of an edible marijuana product within a multi-serving package of edible marijuana products will be easily separable in order to allow an average person 21 years of age or older to physically separate, with minimal effort, individual servings of the product. Each single serving of an edible marijuana product contained in a packaged unit of multiple edible marijuana product shall be marked, stamped, or otherwise imprinted with a symbol or easily recognizable mark issued by the Cannabis Control Commission that indicates the package contains marijuana product.

LATITUDE 42 will not deliver, sell, or otherwise transfer an edible marijuana product with potency levels exceeding the following, as tested by an independent marijuana testing facility licensed in accordance with M.G.L. c. 94G, § 15: for a single serving of an edible marijuana product, five milligrams of active tetrahydrocannabinol (THC); and in a single package of multiple edible marijuana product to be eaten, swallowed, or otherwise ingested, not more than 20 servings or 100 milligrams of active THC. The THC content will be homogenous, or evenly distributed, throughout the edible marijuana product.

LATITUDE 42 will ensure that all products are marked with an easily recognizable mark issued by the Cannabis Control Commission that indicates that the product is harmful to children. In instances where the labeling of the marijuana product is unreasonable or impractical, LATITUDE 42 will include the labeling information on a peel back label or may place the product in a sealed bag with an insert or additional, easily readable label firmly affixed to that bag. LATITUDE 42 will employ tamper or opaque or plain child-resistant packaging as approved by the US Consumer Product Safety Commission per their most recent poison prevention packaging regulations.

LATITUDE 42 will ensure compliance with 935 CMR 500.105 by not utilizing packaging methods below:

1. Using bright colors, defined as colors that are "neon" in appearance.
2. Imitating or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain marijuana.
3. Featuring cartoons.
4. Featuring a design, brand, or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors.
5. Featuring symbols or celebrities that are commonly used to market products to minors.
6. Featuring images of minors; or
7. Featuring words that refer to products that are commonly associated with minors or marketed to minors.

LATITUDE 42 will utilize a Cannabis Control Commission approved seed to sale tracking program to track all product coming into and out of the facility.

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Exhibit M

Traffic Plan



TO	Dorothy Joyce Joyce Strategies, LLC	DATE	November 2, 2020
FROM	Ian McKinnon, P.E., PTOE, RSP Vannesa Methoxha	HSH PROJECT NO.	2019276.00
SUBJECT	120 Nantasket Avenue Transportation Narrative for Lat 42		

Introduction

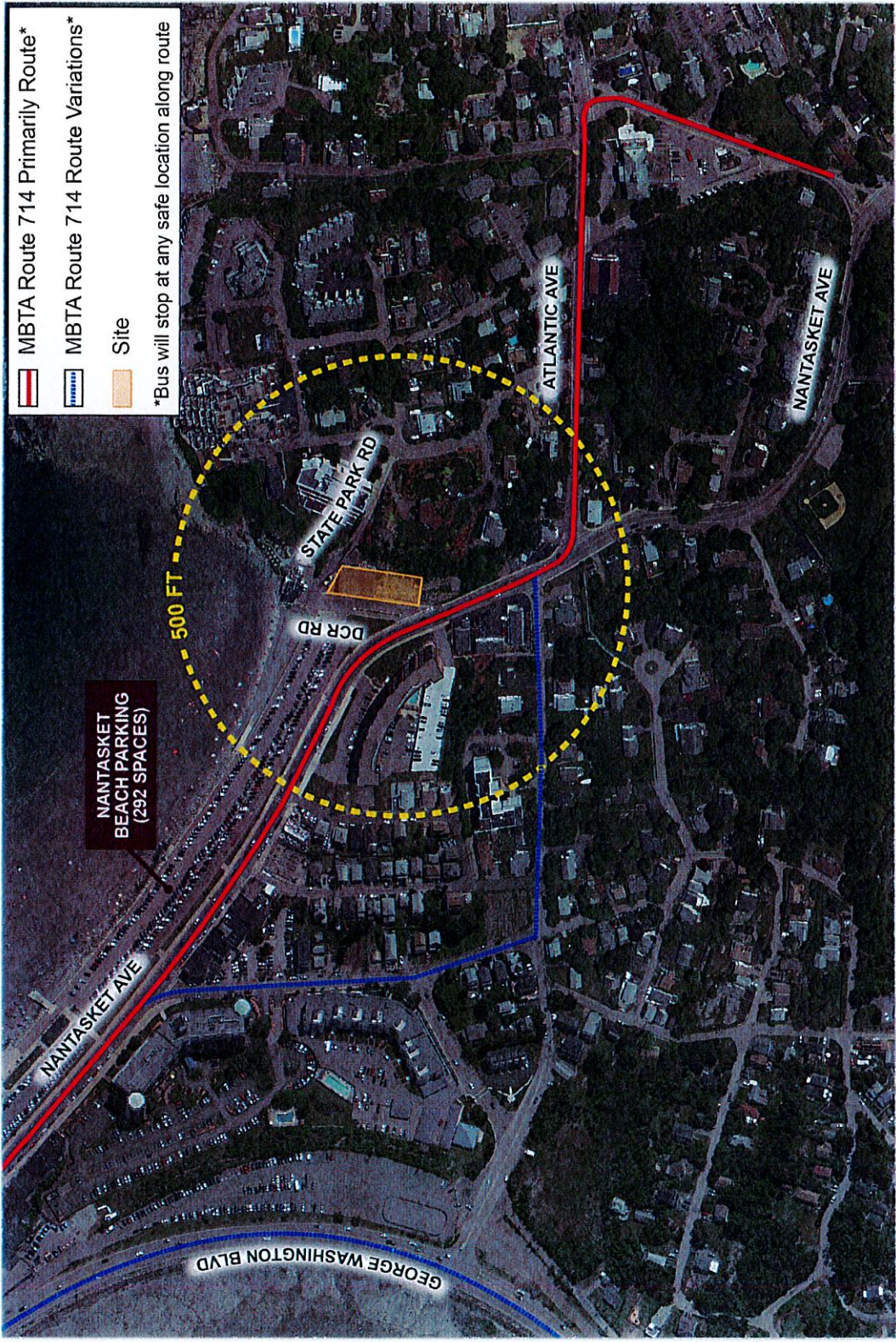
This technical memorandum provides an assessment of the transportation impacts of the Project, located at 120 Nantasket Avenue in Hull, Massachusetts. The proposed development is a medical marijuana dispensary. The Town of Hull has developed zoning by-laws and regulations, passed on February 12, 2018, that allow no more than two marijuana establishments to be constructed within the marijuana overlay district of the town. This report summarizes site access and circulation, parking, trip generation estimates, origin-destination routes, loading/delivery operations, and proposed transportation demand management (TDM) for the facility at 120 Nantasket Avenue.

Project Description

The Project is bounded by Nantasket Avenue to the south, Nantasket Beach Road to the west, State Park Road to the north, and privately owned land parcels to the east. The Project includes the redevelopment of the approximately 14,100 square foot (sf) existing warehouse building into a cannabis medical retail and grow facility. The proposed Project will consist of approximately 1,800 sf of space for the retail portion of the dispensary and approximately 22,200 sf for the cultivation/grow operations. The Project Site will also construct approximately 18 parking spaces on surface lots on-site to serve employees and customers. Error! Reference source not found. shows the location of the Project.



Figure 1. Locus Map





Existing Conditions

Roadway Network

Nantasket Avenue (Route 228) is a minor arterial with one travel lane in either direction. From Nantasket Beach Road to its intersection with Rockland and Hull streets, Nantasket Avenue is under the jurisdiction of the Town of Hull. To the north of the site, from Nantasket Beach Road to Bay Street, Nantasket Avenue is under the jurisdiction of the Department of Conservation and Recreation (DCR). Nantasket Avenue is the primary roadway connecting the Project to the rest of the area roadways. To the south Nantasket Avenue becomes Hull Street in Hingham which intersects with Route 3A within a five-minute drive and Route 3 in Rockland within a 20-minute drive. Nantasket Avenue has on-street parking to the west side to the north and south of the Site, but not directly adjacent to the Site.

The *Nantasket Beach Parking Lot Driveway* is a local road to the west of the Project Site that is under jurisdiction of the DCR. The Nantasket Beach Driveway is one lane in each direction and is approximately 44 feet wide with a 4-foot median. On-street parking is not permitted on either side of the road.

State Park Road is a local road and is under jurisdiction of the Town of Hull. State Park Road is a two-lane road and is approximately 16 feet wide.

Alternative Modes of Transportation

PUBLIC TRANSPORTATION

The Massachusetts Bay Transportation Authority (MBTA) Bus 714, that provides service between Pemberton Point, Hull, and Hingham Depot, passes within proximity to the site. The #714 bus route operates primarily along Nantasket Avenue through Hull and along Rockland Street into Hingham. This service has two fixed bus stops at its terminals running between Pemberton Point at the northern tip of Hull and Station Street in Hingham. The service works on a flagging system along the route and does not have any fixed bus stops. Passengers may flag a bus to stop on either side of the road anywhere between Park Avenue and Atlantic Avenue which means it can stop right in front of the Site. Service has limited frequency and during select times there are slight route variations when a passenger would need to access the bus on Park Avenue.

The extended public transportation services that may be used to connect further out, by using bus 714, include ferry service or MBTA Bus 220. At the Pemberton Point bus stop, a passenger may



access the Hull ferry terminal and take a ferry to the Long Wharf terminal in Boston. At the Station Street bus stop, a passenger may transfer to Bus 220 which goes to Quincy Center where you can pick up the Red Line to go into Boston and further north or to Braintree Station and to the south.

BICYCLE NETWORK

Any cycling that occurs along Nantasket Avenue may take place in the shoulder where the roadway width permits, however, in general there are no defined on-street bicycle facilities in the immediate vicinity of the Project.

PEDESTRIAN NETWORK

Concrete sidewalks are provided on both sides of the road along Nantasket Avenue, on Nantasket Beach Road they are provided only on the east side of the road adjacent to the Project Site, and no sidewalk facilities are provided on State Park Road. A crosswalk is provided on the Nantasket Beach Road approach at the intersection with Nantasket Avenue. The closest crosswalks across Nantasket Avenue are approximately 300 feet northwest or 500 feet south of Nantasket Beach Road with many more crosswalks in the northwest direction.

Future Conditions

Facility Operations

Based on information provided by the Proponent, the proposed weekly hours of operation will be 8:00 a.m. – 10:00 p.m., seven days a week. These times are the hours open to customers, however the facility will be staffed 24 hours a day, seven days a week, with select personnel throughout the night such as security and back office operations and monitoring staff for the grow facilities. These hours will be officially set by the Town in the host Community Agreement and are subject to change. The dispensary will have approximately 1,800 sf of retail space and approximately 22,200 sf dedicated to the grow facility.

Parking

There are two proposed parking areas on the Site. At the rear of the Site, a small lot off State Park Road will be available for staff parking. This will contain approximately six tandem spaces.

A second lot for customers will be located to the front of the Site off Nantasket Avenue. This lot will have approximately 12 spaces. At least one space closest to the building entrance in the customer lot will be designated as a handicapped visitor space. Based on the vehicle trips forecast for a



dispensary of this size, the proposed customer parking should be able to accommodate the future demand.

According to the Town of Hull Zoning By-Laws, the parking requirements within the Nantasket Beach Overlay District require one space per 250 sf of retail. The nature of this facility is likely to have a higher parking demand than a typical retail facility, therefore the proposed customer parking is greater than the zoning guidelines for retail. The Project will provide approximately 18 parking spaces in total.

In addition to vehicle parking, bicycle parking is also required by the Town of Hull at a rate of two bicycle spaces for every 20 vehicle spaces. The Project will provide at least two bicycle spaces near the building entrance.

Site Access and Circulation

The site is currently accessible to vehicles via two curb cuts: one on the north side of the Site and one on the south side of the Site. The southern curb cut is located off Nantasket Beach Road at the southwest corner of the Project Site. The northern curb cut is at the northwest corner of the Project Site right at the intersection of Nantasket Beach Road and State Park Road.

The southern curb cut is proposed to remain off Nantasket Beach Road and provide access to the customer parking area. Any modifications and construction access may require a DCR construction access permit. The northern curb cut is proposed for loading and service access only. Adjacent to the loading area, access off State Park Road will also be provided for the employee parking spaces.

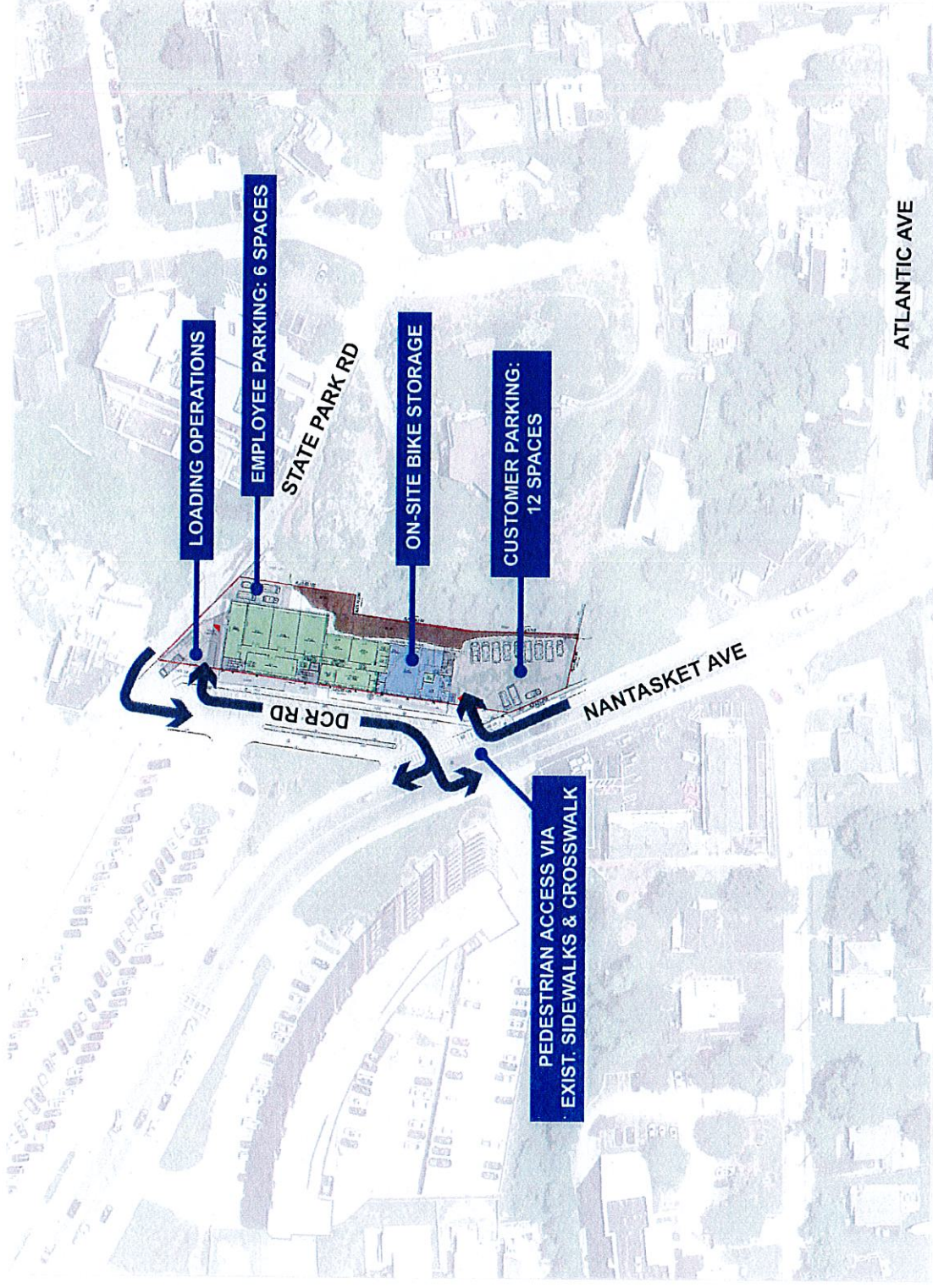
Error! Reference source not found. shows the site plan with vehicle circulation and location of the parking areas.

LOADING/DELIVERIES

All loading and vehicle deliveries will occur at the back of the building. The Project will have one loading dock serving both the retail and cultivation aspects of the Project. All the product being sold will be grown on-site therefore product deliveries will be limited. Most service and delivery trips are expected to occur outside of the a.m. and p.m. roadway peak hours, but within the workday hours, which will minimize the impact to the surrounding transportation network. Deliveries will be scheduled to respect the adjacent residential neighborhood. Service and product delivery for the Project is expected to occur one to two times per week. There will also be one commercial dumpster pickup per week. Deliveries will be brought in through the rear loading dock.



Figure 2. Site Plan





Trip Generation

To estimate the number of trips expected to be generated by the Project, data published in the *Trip Generation Manual, 10th Edition* by the Institute of Transportation Engineers (ITE) were used.

The latest ITE *Trip Generation Manual* includes Land Use Code (LUC) 882 – Marijuana Dispensary. ITE defines the land use as a “standalone facility where cannabis is sold to clients or consumers in a legal manner.” Since the proposed facility will also operate the manufacturing/cultivation of the cannabis product on-site, LUC 140 – Manufacturing was also used to estimate trips related to those operations. Consistent with other Massachusetts studies, a portion of trips to retail-based facilities can also originate as pass-by trips associated with trips that were already occurring in the area for another purpose. Given the future density of similar medical retail facilities, many of the trips are expected from the local community and therefore 25% of trips were assumed to be pass-by trips. Trip generation for the project is detailed in **Table 1**.

Table 1. Project Trip Generation

Direction	Dispensary Trips	Manufacturing Trips	Total Vehicle Trips
Daily Trips			
Enter	168	44	212
<u>Exit</u>	<u>168</u>	<u>44</u>	<u>212</u>
Total	336	88	424
a.m. Peak Hour Trips			
Enter	1	11	12
<u>Exit</u>	<u>0</u>	<u>3</u>	<u>3</u>
Total	1	14	15
p.m. Peak Hour Trips			
Enter	14	5	19
<u>Exit</u>	<u>14</u>	<u>10</u>	<u>24</u>
Total	28	15	43

- Based on 1,769 sf of LUC 882 (Marijuana Dispensary) with 22,163 sf of space for the grow facility (LUC 140 Manufacturing).

As shown in **Table 1**, the proposed cannabis dispensary is expected to generate approximately 424 daily weekday trips, of which 43 would occur during the weekday p.m. peak hour. Retail activity is



expected during the midday and evening hours resulting in very few trips expected during the morning peak hours.

PATRON TRIPS

Customers are expected to visit the Site throughout the day within open retail hours projected to be 8:00 a.m. – 10:00 p.m. with the peak times likely occurring from 5:30 p.m. to 7:30 p.m. The facility will have five to seven point of sales registers. The dispensary is expected to process each medical patient at an average of 10 minutes. Expedited measures such as online pre-ordering and reservations will be used to process retail patrons promptly.

EMPLOYEE TRIPS

The cultivation and retail employee trips will vary depending on shift. The facility is expected to employ the following numbers of full and part-time employees: 10-20 for retail, 10-12 for grow manufacturing, 10-15 for security, and three full-time administrative staff. The cultivation facility is expected to operate throughout the day with no manufacturing occurring overnight. Retail staff is expected to arrive prior to the projected opening of 8:00 a.m. and not all staff will arrive at the same time. Staff will progressively continue to arrive throughout the day. Similarly, staff will depart throughout the evening as business slows down.

The staffing needs will be split into three shifts. The first shift, overnight, will consist of approximately two to five security staff. The second shift, daytime, will consist of 15-20 employees with at least five for retail, three for security, and the rest for the grow room/manufacturing. The third shift, evening to midnight, will consist of up to 10 employees for retail, the grow rooms, and security.

LAND USE TRIP COMPARISON

Over the year the existing building has been proposed to be reused as retail space, a pharmacy, or a restaurant. With the exception of retail, if a development with the existing building footprint were proposed for one of the other land uses, they would have a daily trip forecast that exceed the trips estimated for the proposed marijuana dispensary, as shown in **Table 2**.

Table 2. Land Use Comparison of Daily Trips

Direction	Entering	Exiting	Total
Project	212	212	424
Pharmacy	430	430	860
Fast Food Restaurant	2,250	2,250	4,500
Supermarket	510	510	1,020



Direction	Entering	Exiting	Total
Retail	180	180	360

Alternative land uses were based on a 9,500-sf building footprint.

TRIP DISTRIBUTION

The service area for the Project will be largely dependent on competition in the area as other dispensaries open. As the market becomes more saturated, the operations at this dispensary may start out with trips from a greater region, but with time start to serve local trips more like a convenience or package store. The distribution of trips was based off existing traffic patterns on the local roadway system using data from several traffic counter locations maintained by the Massachusetts Department of Transportation (MassDOT). A larger majority of trips will come from Nantasket Avenue to the south of the Project with a smaller share of local trips coming from Nantasket Avenue to the north.

A larger portion of Hull residents live along Nantasket Avenue north of the Project and are expected to access the Project traveling southbound on Nantasket Avenue. Regional trips are expected to come from Route 3A or Route 228. Trips coming from towns to the southeast like Cohasset, Rockland, and Marshfield will either take Route 228 all the way northbound until it becomes Nantasket Avenue or take Route 3A westbound and then go northbound on Route 228. Trips originating in towns to the west and southwest like Hingham, Weymouth, and Quincy will use Route 3A eastbound and go northeast at the Hingham rotary onto Summer Street. From there, most will likely take George Washington Boulevard and turn right at Rockland House Road to get to Nantasket Avenue, while a portion may use Rockland Street back to Nantasket Avenue.

MODE SHARE

The American Community Survey (ACS) for the 5-Year Estimate of 2014-2018 was used to determine general mode share patterns in the area by looking at means of transportation people use to commute to work. The Town of Hull had an estimated 78.6 percent of people commuting by vehicle, 12 percent using public transportation (half of which used the ferryboat), approximately 2 percent walking, 6.5 percent worked from home, and less than 1 percent used modes like bikes, taxicabs, or motorcycles. Based on ACS data, most trips to the site will be vehicle trips, however the Project is committed to TDM measures to reduce the number of single occupant trips.

Mitigation and Opening Plan

The Proponent plans to work with the Town of Hull to create a Project that efficiently serves vehicle trips, improves the pedestrian environment, and encourages alternative mode of travel. As part of the Project, the Proponent will bring all abutting sidewalks and pedestrian ramps to the Town of



TECHNICAL MEMORANDUM

120 Nantasket Avenue Transportation Narrative
November 2020

Hull and Federal ADA standards. This may include the reconstruction and widening of the sidewalks where possible, the installation of new, accessible ramps, improvements to street lighting where necessary, planting of street trees, providing bicycle storage racks, and/or street furniture (i.e. benches, etc.) surrounding the site, where appropriate.

The Proponent intends to implement strategies to reduce traffic and parking impact. Due to the proximity of the site to a DCR beach parking lot, there is the possibility that customers of the dispensary may park at the beach parking lot. The Proponent will work closely with DCR to ensure there is no impact to the beach parking lots and users of those parking areas. The main entrance point to the beach parking lot is the roadway bordering the Project to the west which is also where customers will access the dispensary parking lot. The Proponent will work with DCR on any right of way issues at this driveway and to address queuing that may occurring between vehicles going to the beach and those going to the dispensary.

The Proponent will explore alternative methods to accommodate additional parking if the proposed on-site facilities are determined to be insufficient for the future demand. This may include running shuttle buses to an off-site location or working with DCR on shared parking options at the beach parking lot.

Another transportation management tool is to designate a transportation coordinator on-site to manage parking and loading. This individual can help monitor people who may be improperly parking on the street or in restricted areas. The Proponent plans to implement a system of pre-ordering or scheduling appointments to reduce customer time in the store.

Additionally, the Proponent will provide bicycle parking on-site to encourage non-vehicle trips. Delivery trips to and from the Site will be scheduled outside of peak traffic hours.

Prior to the opening date, the Applicant will create a detailed opening plan for management of the grand opening. As other medical facilities open prior to this location, market conditions will dictate the level of management that is needed to ensure a smooth opening. Some measures that will be considered by the Proponent for the initial opening include:

- Queue management software with appointment-only scheduling;
- Evaluation of additional parking lot options;
- Police detail to manage the curb and intersection along Nantasket Avenue outside the Site; and
- Additional staff on Site to manage queues and process customers.



Further mitigation measures will be discussed with the Town as the Project moves through the permitting process.

Conclusions

The Proponent plans to work with the Town of Hull to create a Project that efficiently serves vehicle trips, improves the pedestrian environment, and encourages alternative mode of travel. The proponent will create an initial opening logistics and management plans with consultation of local police and Town of Hull officials. The number of expected trips to the Site are lower than comparable land uses such as retail pharmacies, grocery or restaurants in the same building footprint forecasts are expected to be less than a medical cannabis facility. The impact due to the Project is expected to have a minimal impact on the surrounding roadways, especially when the market is saturated.

Exhibit N

Odor Control: Noise Reduction Plan



November 2, 2020

Odor and Noise Plan

Prepared for
Latitude 42 Therapeutics, LLC
120 Nantasket Avenue
Hull, MA 02045

Report Status: [Draft Report]

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Odor Elimination Plan

The odor elimination plan for Latitude 42 will be a belt and suspenders approach to capturing and removing any odor particles that are produced in the facility. We will consider the pressures in the building, eliminating the mixing of HVAC systems and use the latest adsorption technologies to eliminate point of use and overall odor productions. The follow is the list of actions Latitude 42 is going to implement in their new facility to eliminate odors:

- For all the Cultivation and Processing areas we will build sealed individual rooms with-in the overall building. These will be completely separated from every other room and maintain a neutral pressure.
- In these separate rooms, each will get their own HVAC and dehumidification systems. These systems will be separate from the other systems in the building.
- Each of these separate rooms will get an Odor Removal Molecular Filtration air system. These recirculating systems are produced by Byers Scientific.
- At the entrance way of each of these separate rooms, we will install a high velocity air curtain that will instantly come on, provide a air barrier between the room and the corridor preventing any odors or particulates from exiting these room.
- The rest of the building and corridors will be kept at a positive pressure to keep the air in the neutral pressured sealed rooms where it belongs.
- Throughout the rest of the building we will install the Odor Removal Molecular Filtration air system.
- The Odor Removal Molecular Filtration system will also be incorporated into the high efficiency HVAC systems for the remained of the building. This will ensure that all the air in the building is exposed to this removal system.
- We will treat the outside of the building, all year long, with a Molecular Filtration system that will be spread from the roof, down around the whole building with a waterless vapor. This system is also produced by Byers Scientific.
- All of these systems will be tracked and monitored with a state-of-the-art alert system providing daily and hourly reports on the performance.



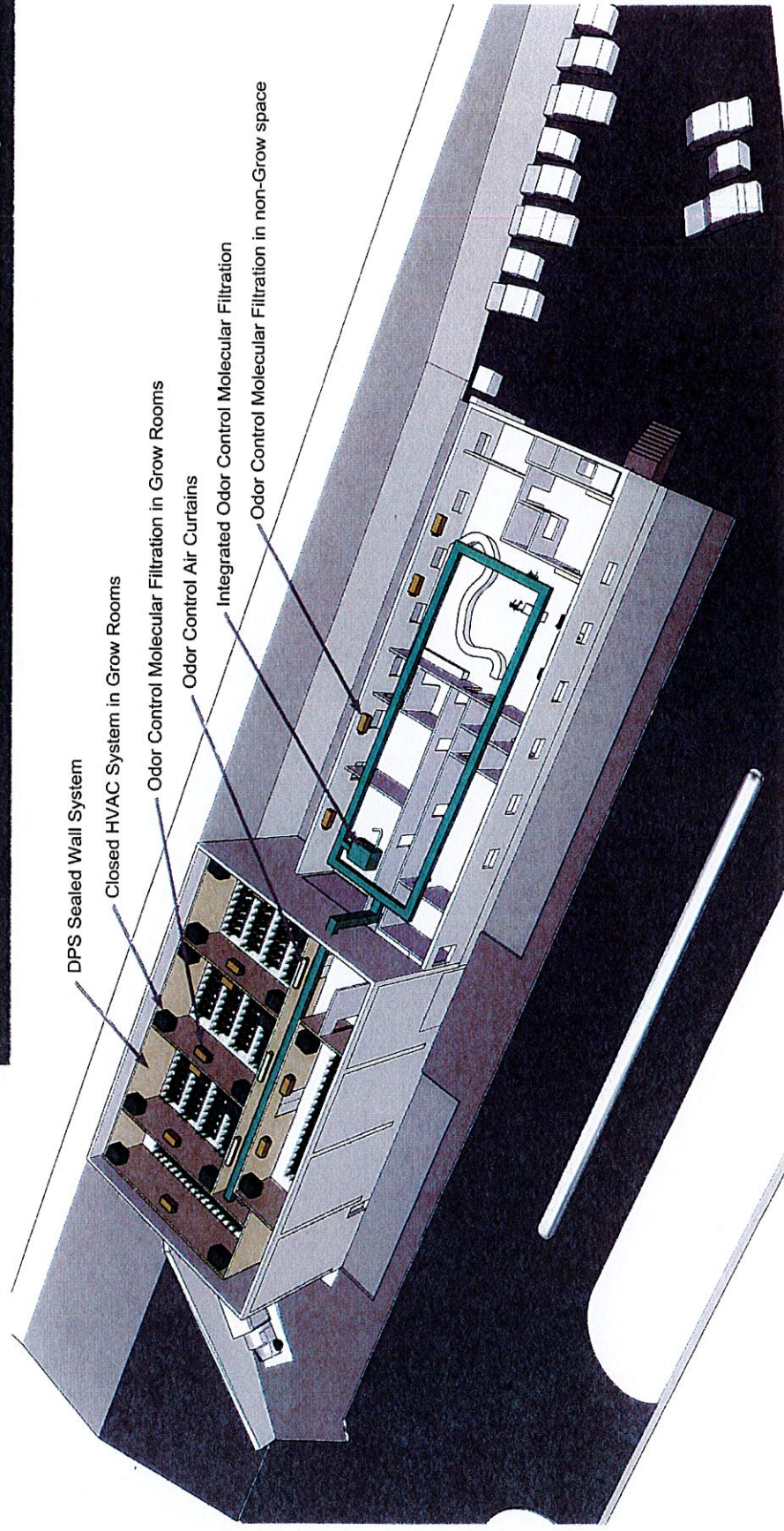
Noise Reduction Plan

The noise reduction plan for Latitude 42 will be used primarily on the outside of the building. We will incorporate the following techniques to reduce sound produced by the rooftop equipment:

- All rooftop units will be manufactured with double wall construction and have sound reducing materials between the walls.
- Each rooftop unit will have vibration isolation used internally and externally to dampen any vibration produced by the units.
- All the compressors on the roof will be insulated with sound reducing materials.
- All the split system for the Cultivation and Processing areas will have all the sound attenuation options installed on them. This will include the intake and outlet of these units.
- Any exhaust fans will have sound attenuators on the outlet and / or the exit velocities of these fans will be reduced to lower the sound levels.
- All rooftop equipment will be installed inside a sound eliminating walled in area.

What will it look like?

State of the Art Medical Cultivation & Product Development Facility



Odor Control Molecular Filtration

1. This system will be throughout the interior facility including the cultivation and processing rooms and integrated from the beginning into the HVAC system.
2. We will be using a Camfil molecular filters, an **organic activated carbon made from coconut shells**, the most porous carbon available that is **4 times more effective than traditional carbon filters**
3. All Systems will be tracked and monitored with a state-of-the-art technology alert system providing daily & hourly reports on performance.



PRE LICENSE General
Operations
Staffing and Training
Plan for:

Latitude 42
Therapeutics LLC
120 Nantasket Ave.
Hull, Massachusetts
November 30, 2020



Our Mission

To set a new standard in Medical Cannabis Research & Development with specialized care through the building of two distinct spaces that enable full seed-to-sale operations while remaining committed to the values of the Town of Hull. Latitude 42

Therapeutics LLC (the “Company”) is focused on the history and unique character of Hull and endeavors to be a proud brand representing the lifesaving and pioneering culture of our community. Our goal is centered on the economic development of Hull and the scientific advancement of cannabis research—creating year-round jobs and revenue for our town, while developing a medical-grade lab for cannabis product production and a distinctively superior patient experience within our medical cannabis treatment center.

A Message from Leadership

“We look forward to working collaboratively with community leaders to foster meaningful relationships that advance all in our community. We are committed to remaining active and engaged members of the Town of Hull, where we will promote health, safety, and wellbeing of all residents, businesses, and organizations who call Hull home. In keeping with the Company’s ethos, Latitude 42 is also committed to working collectively with the community to inform a Corporate Social Responsibility strategy and platform that will include its diversity, equity, and inclusion strategy and will provide a long-term vision for the Company to maximize positive societal impact.” This General Operations, Staffing and Training Plan (the “Plan”) outlines the policy standards and operating procedures that define our business operations and workplace environment. The Plan sets out our core business and social philosophy and provides guidance and support for employees in all facets of our business from cultivation, quality assurance, and manufacturing through the dispensing of our products to our medical cannabis customers. It is meant to be a guide for all to follow as we strive to achieve our business and social goals in a safe, welcoming, and diverse workplace.

Sean Power, Founder and Chief Executive Officer (CEO)

A life-long resident of the South Shore and current Hull resident, Sean is an entrepreneur who has focused his professional career on building, developing, and ultimately selling three health care data technology companies. As a Parkinson’s patient, Sean understands well the needs of individuals with chronic medical conditions. Sean is excited to partner with the Town of Hull in medical cannabis, which will remain an important growth sector in the healthcare industry for decades to come.

Jeffrey Shaheen, Executive Director for Community and External Affairs (COO)

Jeffrey is a life-long resident of Hull and union representative for Local 26 at Fenway Park. Jeffrey has a deep passion for the healing properties and alternative therapies the medical cannabis industry can offer—not only for common debilitating diseases such as cancer, Parkinson’s, and MS but also for those that see cannabis as a possible alternative to prescription opioids for pain

management, sleep regulation, and other conditions that otherwise would require pharmaceutical products.

Mike Grasso, Quality Assurance Officer and Director of Production

A positive, productive, and experienced team member with a uniquely successful management style, Mike is driven to create and efficiently meet production goals by fostering diverse, equal, and successful working relationships with clients and co-workers. Mike is a proven professional in cultivating network partnerships and comes to the Company after having served as Director of Operations for The Green Lady Dispensary, a vertically integrated cannabis production facility in Nantucket, Massachusetts. His experience includes:

- Directed design and construction of vertically integrated cultivation, concentrate processing, marijuana-infused product, and dispensary facilities; and
- Managed and supervised the purchasing, logistics, and placement of all cannabis cultivation and production and retail equipment and software; and
- Created and executed plans for commercial cannabis cultivation, concentrate production and infused product production, and staffing; and
- Managed compliance and oversaw Massachusetts Cannabis Control Commission inspection processes ensuring successful procurement of recreational adult-use cannabis licenses; and
- Delivered \$500k+ in revenue from retail opening in under 25 days

Note: This Pre License General Operations, Staffing and Training Plan (the “Plan”) is filed for the sole purpose of supporting the Company’s application requesting consideration for a Host Community Agreement to the Town of Hull Board of Selectmen under the Hull Board of Selectmen Rules and Regulations for Consideration of Requests for Host Community Agreements, Section 2.00, Submission of HCA Requests to the Board.

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Introduction

Latitude 42 Therapeutics LLC (the “Company”) was founded by Sean Power who, together with the other members of the Executive Team, including Jeffrey Shaheen, and Mike Grasso, plans to set a new standard in Medical Cannabis Research & Development with specialized care by building and operating a state-of-the-art facility for growing, manufacturing, and dispensing medical cannabis products in the Town of Hull, Massachusetts. The information in this Plan is designed to provide guidance for managers and supervisors related to the responsibilities of staffing and hiring. This plan is designed to provide operational guidance support the development of human capital and staff capabilities to maximize the efficiency and effectiveness of the organization for the Company’s Medical Marijuana Treatment Center (the “MTC”) proposed for the Hull Site in accordance with the licensing, operational, social equity and other requirements applicable to MTCs as set forth in 935 CMR 500.002, 935 CMR 501.101, 935 CMR 500.105, 935 CMR 500.120, 105 CMR 500.00, 105 CMR 590.00, and other regulations deemed applicable to the proposed MTC by the Massachusetts Cannabis Control Commission. Please note that the Plan may be amended at any time up to and including the time that the Massachusetts Cannabis Control Commission issues a license to operate the MTC on the Hull Site. Thereafter, the Plan will be reviewed and updated six months after the Company begins operations and annually thereafter to adapt to changes in the needs of the Company or trends in the regulated marijuana industry in Massachusetts.

The Company is committed to following all local, state, and federal laws related to labor and employment. The Company will adhere to requirements as described by:

- The [Wage and Hour Division](#) of the U.S. Department of Labor; and
- The Commonwealth of Massachusetts Department of Employment and Training
- The Commonwealth of Massachusetts Cannabis Control Commission, generally 935 CMR 1.000 through 499.000, 105 CMR 500.000 and 105 CMR 590.000.

The Company’s employment practices are based on job qualifications, performance, and conduct without regard to race, color, religion, national origin, age, sex, marital status, height, weight, disability, genetic information, or any other legally protected status.

The Company provides reasonable accommodations to qualified individuals with disabilities in accordance with the law. Any employee with a need for accommodation due to a disability will be encouraged to notify his/her supervisor as soon as possible.

It is in our best interest to hire individuals according to planned needs. The staffing portion of this plan is designed to estimate the positions that will be necessary to efficiently manage the business and specify the job descriptions and expected qualifications for each.

General Staffing Policies

The Company will use best practices to staff positions and to retain, educate, and promote employees. The objective is to recruit and employ a diverse group of employees who value and promote inclusiveness among the workforce in a manner that is consistent with the Company's ethos as a manufacturer and dispenser of medicinal cannabis products in the regulated marijuana industry in Massachusetts. The following general policies are instituted to ensure equitable, secure, safe, and efficient operations in an inclusive work environment.

The Company will use best practices to staff positions and retain employees in furtherance of its general staffing needs in accordance with the requirements of 935 CMR 500.105 (1)(i), 935 CMR 500.105 (2). Note that, unlike recreational retail employees, MTC employees must be trained in 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. Training "shall be tailored to the roles and responsibilities of the job function of each MTC Agent, and at a minimum must include training on confidentiality, privacy, security and other topics as specified by the Commission. MTC Agents responsible for tracking and entering product into the Seed-to-sale SOR must receive training in a form and manner determined by the Commission. At a minimum, staff shall receive eight hours of ongoing training annually." See 935 Code Mass. Regs. § 501.105(2).

The Company has adopted a Diversity Impact Plan that is in keeping with its social ethos on its own initiative. To the extent that the Company's Diversity Impact Plan is in conflict with the provisions of 935 CMR 501.105(2) or any other of 935 CMR 100.000 through 499.00, the relevant provision of the CMR shall apply
the following policies will be carried out to ensure efficient operations:

- Include managers in the hiring process for positions they will be responsible for supervising.
- Ensure that an adequate number of employees are hired and scheduled for each shift to reduce stress caused by continuous overwork.
- When appropriate, employees will be cross-trained such that they may assist other departments that temporarily become busier than normal.
- Ensure that backup support is available through a system of on-call or part-time workers in case scheduled staff cannot come in for a shift.
- Managers will maintain a combined record of additional educational qualifications and skills that employees have such that new opportunities may be filled from within the company when possible.
- Utilize a Hiring Tracker (Appendix A) to manage the status of hiring employees.
- Utilize a variety of recruiting resources, including online career websites, recruiting agencies, job fairs, placement departments at training agencies, etc.
- Utilize an Intake Checklist (Appendix B) to ensure all documentation is properly collected and activities associated with hiring an employee are completed.
- Provide an environment in which employees feel respected and appreciated for quality work.

- An Employee Handbook will be provided to all staff as part of the training process specifying expected behaviors, company policies, and a disciplinary procedure.

Managers will be trained in best hiring practices, effective training techniques, and appropriate evaluation methods, which are further detailed in sections below. Staffing Requirements

The following table specifies the essential staffing positions that need to be filled and anticipated associated costs related to their functions. *Estimated Cost refers to monthly salary/benefits, payroll taxes and other insurances.

Primary Employee	Man-hours/Week	Function	Relative Importance of Function	Estimated Cost/Mo.*	Notes
Chief Executive Officer	N/A	Overall Business Management	Critical		
Chief Operating Officer (Chief Compliance Officer)		Overall Operations Management, Production, Quality Assurance and Regulatory Compliance	Critical		
Executive Director of Community and External Affairs	40		Critical		
Chief Financial Officer	40	Finances and Accounting	Support		

Primary Employee	Man-hours/Week	Function	Relative Importance of Function	Estimated Cost/Mo.*	Notes
Security Manager	40	Security Management	Critical		
Computing Security Officer	20	Computer Security	Support		
Inventory Control Manager	40	Inventory Control Management	Critical		
Facilities Manager	40	Facility Management	Critical		
Facilities Asst Manager/Staff	40	Facility Management Support	Support		
Quality Assurance Officer	40	Quality Assurance	Support		
Record Keeping Manager	40	Record Keeping	Support		
Security Staff	196 (2 during all business hours)	Security Operations	Critical		
Inventory Control Staff	40	Inventory Control Operations	Critical		
Sales Manager	40	Sales	Critical		
Facilities Staff	40	Facility Operations	Support		
Cultivation/Mfg. Manager	- 14	Cultivation/Mfg. Operations	Critical		
Cultivation/Mfg. Staff	168	Cultivation/Mfg. Support	Critical		

Organizational Chart

The Company, its manager, and Members a/k/a its Board of Directors

Chief Executive Officer

Executive Director of Community and External Affairs

Chief Operations Officer

Inventory Control Manager

Inventory Control Staff

Computing Security Manager

Security Manager

Security Staff

Record Keeping Manager

Chief Quality Assurance and Production Officer

Quality Assurance Staff

Facilities Manager

Facilities/Janitorial Staff

Chief Financial Officer

Sales Manager

Sales Staff

Director of Production, Cultivation/Manufac./Transp.

Cultivation/Manufacturing Manager

Cultivation/Manufacturing Staff

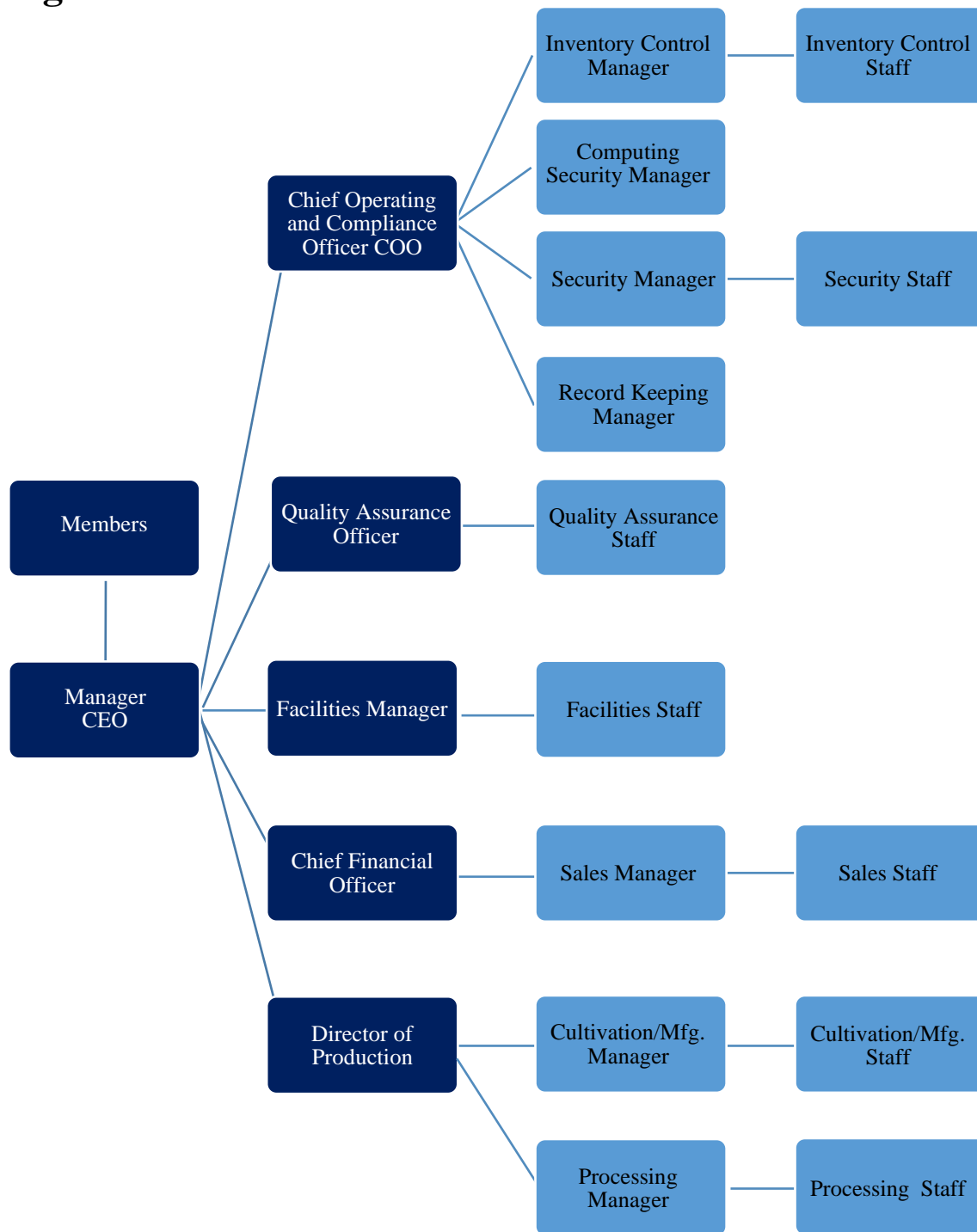
IPM/Pest Control Manager

Propagation Manager

Trimming/Processing Manager

Processing Staff

Organizational Chart



Job Descriptions

Chief Executive Officer

The Chief Executive Officer (CEO) is the primary representative of the company to regulators, law enforcement, and the public. The CEO provides leadership in directing the company's mission, vision, values, and strategy. The CEO implements and manages the strategic services, goals, and objectives of the organization. The CEO sets the example of professionalism and respect for others in all areas of operations.

Responsibilities include, but are not limited to:

- Operating the organization according to direction provided by the Board of Directors.
- Facilitating an open communication system to support operations and administration of the Board by advising and informing its members.
- Reporting progress and statistical performance measures to the Board on a quarterly basis.
- Overseeing all operations and business activities to ensure they produce the desired results based on goals and timelines.
- Hiring qualified personnel for Executive Staff positions.
- Building and maintaining a positive working relationship with Executive Staff and being open to suggestions for improvements from employees.
- Enforcing adherence to legal guidelines and standard operating procedures to maintain the Company's legal status and business ethics.
- Implementing the Business Plan and make suggestions for its improvement.
- Setting goals for performance and growth.
- Reviewing financial and other reports to track business performance and devising methods for improvements.
- Building relations with key partners and stakeholders and acting as a point of contact for investors.
- Fostering a spirit of cooperation, respect, and professionalism among employees and other executives.
- Analyzing problematic situations and occurrences and providing solutions to ensure company success and growth.
- Maintaining a deep knowledge of the cannabis markets and industry.
- Staying up to date on management-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other management experts.

Requirements:

- BA in business required, MBA is strongly desired
- 3 years of experience as a CEO, COO, or CFO
- 2 years of experience working in the pharmaceutical or cannabis field desired
- In-depth knowledge of corporate governance and general management best practices

- Ability to demonstrate an understanding of business functions, including finances, HR, sales, and marketing
- Strategic planning and business development experience
- Excellent communication skills
- Ability to pass a background check

Executive Director of Community and External Affairs

The Executive Director of Community and External Affairs serves as the public face of the Company. Working with the Chief Compliance Officer (CCO), the Executive Director of Community and External Affairs oversees implementation of the Company's Good Neighbor Policy and the Company's Philanthropic Giving Programs.

Responsibilities include, but are not limited to:

- Consulting with CEO regarding Community and External Affairs, giving the CEO recommendations as warranted from time to time.

Requirements:

- 2-3 years of experience in community and external affairs

Chief Operations Officer

The Chief Operations Officer (COO) reports to the CEO and is responsible for the daily operations of the facility, ensuring compliance with the operational requirements of 935 CMR 500.105 and 935 CMR 500.130 and 935 CMR 500.160 and for implementing the Company's overall business plans by managing designees who will be responsible for a subset of tasks.

Responsibilities include, but are not limited to:

- Managing security compliance according to state guidelines and the Security Plan.
- Having a sufficient understanding of computing security to the extent that the COO is informed to select a qualified individual or contractor to implement the computing security component of the Security Plan.
- Managing a budget covering compliance-related resource.
- Working with local and state government agencies on environmental issues and specific licensing requirements.
- Serving as the Company's secondary expert (after the Inventory Control Manager) in the use of the Inventory Control System and ensuring compliance with all related regulations.
- Monitoring and interpreting the regularly changing rules of state cannabis commerce and communicating with staff accordingly.
- Defining the structure of a record management system, including a document retrieval system, in compliance with the Record Keeping Plan.
- Overseeing the training compliance system for all employees.

- Working closely with the Quality Assurance Officer to monitor and improving the implementation of standard operating procedures.
- Overseeing the maintenance of records such that requests for information from regulating authorities or law enforcement will be met by required deadlines.
- Fostering a spirit of cooperation, respect, and professionalism among employees and other executives.
- Staying up to date on compliance-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other compliance experts.

Requirements:

- Ability to demonstrate an extensive knowledge of state and local cannabis compliance laws
- Proficiency or willingness to rapidly undertake extensive training in the use of the state's selected inventory tracking system
- 3 years of experience in management or HR in a related industry
- Familiarity with team building and training employees on compliance issue
- Motivated self-starter and proficient at multi-tasking
- Aptitude in solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

Inventory Control Manager

Under the direction of the CCO, the Inventory Control Manager (ICM) will be responsible for carrying out tasks specified in the Inventory Control Plan. In consultation with the CCO and the Quality Assurance Officer (QAO), the ICM will recommend changes and amendments to the Inventory Control Plan on an annual basis.

Responsibilities include, but are not limited to:

- Serving as the Company's expert on the state-required inventory control system (ICS)¹ and be aware of updates and compliance requirements related to the system
- Act as the point of contact with the system vendor
- Train and manage at least one other employee to have a sufficient knowledge in the use of the ICS to carry out upper level functions in the absence of the ICM and the CCO

¹ The Massachusetts Seed-to-Sale Program. The CCC establishes minimum standards for the requirement that all licensees possess and operate an interoperable publicly available application programming interface seed-to-sale tracking system sufficient to ensure the appropriate tracking and tracing of all marijuana cultivated, processed or manufactured in Massachusetts. See G.L. c. 94G, § 4(a½) (xvii).

- Train incoming employees on the use of the ICS based on the requirements of his or her position
- Foster a spirit of cooperation, respect and professionalism among employees and other managers
- Maintain ICS training records and all other documentation and logs per regulations and procedures
- Keep related equipment in good working condition and secured when not in use
- Develop a method to collect inventory information in the event of loss of access to the electronic inventory system
- Carry out inventory verifications and report discrepancies
- Resolve system notifications within a specified time period
- Run reports from the ICS as requested

Requirements:

- 2-3 years of experience in a management position in a related industry
- 2 years of experience working with a computer-based inventory system
- Experience in the cannabis industry preferred
- Willingness to quickly learn regulations related to inventory control and participate in extensive training to develop an expertise in the ICS
- Ability to pass a background check

Record Keeping Manager

The Record Keeping Manager (RKM) reports to the CCO and is responsible for complying with record-related regulations and implementing tasks in the Record Keeping Plan as required by 935 CMR 500.105 (1) (g) and 935 CMR 500.105 (8) and (9). Records are maintained to provide operational information to company managers, advisors, and owners for decision-making purposes, and to provide information in case of insurance, criminal, or regulating authority investigations.

Responsibilities include, but are not limited to:

- Manage records within a digital, indexed record management software such that materials may be quickly retrieved in the event of a request from regulators or law enforcement officials
- Work with the CCO to improve indexing or tagging categories to apply to each document
- Scan paper records into the record management system on a daily or weekly basis
- Delete or discard digital and paper records according to the company's record retention policy
- Work with the Computing Security Manager to ensure records are stored securely, backed up, and easily accessible

Requirements:

- Must be at least 21 years of age

- Must have at least 2-3 years of administrative or record keeping experience, preferably in a legal, tax or other highly regulated industry
- Experienced in using standard computer programs and able to learn new software in a relatively brief period
- Willing to rapidly become familiar with regulations and record keeping standards
- Able to pass a background check

Security Manager

Under the direction of the CCO, the Security Manager (SM) is responsible for carrying out the bulk of the responsibilities identified in the Security Plan and managing the Company's Security Officers. The Company's Security Plan complies with the specifications for security plans as required by 935 CMR 500.105 and specified in 935 CMR 500.110.

Responsibilities include, but are not limited to:

- Implement and enforce security regulations and policies.
- Ensure the protection of people, property, and assets.
- Reduce risks, respond to incidents, and limit liability in all areas of financial, physical, and personal risk.
- Act as liaison to the local Police Department (PD).
- Schedule all security services and officers.
- Manage a budget covering security resources and employees.
- Ensure all security equipment and systems are operated and maintained according to manuals, standard security practices, and the Security Plan.
- Administer the access control program, including the enrollment of personnel in the company's access control system.
- Compile reports as required by the CCO.
- Utilize all security systems to discover security breaches and identify compliance issues.
- Train personnel according to established procedures and conduct regular security meetings to discuss problems and plan future security requirements plans.
- Ensure the maintenance of training records and security logs.
- Manage all visitor access to the facility.
- Act as liaison to all departments on security measures, procedures, and needs.
- Coordinate the security of transportation activities, if any, including the planning of delivery routes to ensure the safety and security of the delivered goods and employees.
- Conduct security evaluations to ensure constant improvement and compliance.
- Ensure the reporting and documentation of all incidents and provide initial information for investigations to the CCO.
- Ensure that all records are forwarded properly according to the Record Keeping Plan.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Stay up to date on security-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other security experts.

Requirements:

- 5-10 Years Security Management Experience
- Minimum of HS Diploma or equivalent, college degree preferred
- Required Massachusetts Private Investigator License or ability to be licensed as a Massachusetts Private Investigator
- Must be willing and able to work a flexible schedule based on the demands of the business
- Aptitude for solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check
- Preference for former law enforcement or veterans.

Security Staff, Unarmed

Security Staff report to the Security Manager and assist in maintaining the safety and security of the staff, products, and the facility.

Responsibilities include, but are not limited to:

- Conduct periodic inspection of premises to protect against fire, theft, vandalism, and illegal activity.
- Maintain required records and logs.
- Prevent access to any unauthorized persons within the registered premises
- Assist any staff with security access issues.
- Monitor any suspicious behavior by guests, visitors, or personnel.
- Ensure compliance with state and local regulations and company procedures.
- Prepare reports as requested by the Security Manager.

Requirements:

- At least 21 years of age
- A current security guard license or the ability to receive a license and a Massachusetts Registered Cannabis Agent, including a background check, from the Massachusetts Cannabis Control Commission or the local licensing authority upon hiring
- Prior security, law enforcement or military experience preferred

Computing Security Manager

Under the direction of the CCO, the Computing Security Manager (CSM) will manage the security related to data and technology and will be responsible for ensuring compliance with the Computing Security portion of the Security Plan.

Responsibilities include, but are not limited to:

- Interpret and establish security technologies and create an information security framework and architecture that protects sensitive data from threats.

- Monitor computing operations and infrastructure by reviewing alerts and logs daily.
- Ensure that security tools and technology are maintained and updated.
- Ensure that security vendors are appropriately vetted, meet contractual agreements and comply with regulations and policies.
- Identify patterns in which employees are failing to comply with procedures and recommend additional training or procedure updates to the CCO.
- Foster a spirit of cooperation, respect and professionalism among employees and other managers.
- Manage a budget related to computing resources.
- Evaluate new technologies and make recommendations for their use to the CCO based on industry standards and company needs.
- Audit internal security systems and policies frequently to identify areas needing improvement.
- Develop and maintain a detailed security incident response program.
- Regularly report to the CCO on the status of computing security.
- Stay up to date on computing security-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other cybersecurity experts.

Requirements:

- 6-10 years of Computing Security Management experience or a bachelor's degree in computer science, programming or a similar field from an accredited institution and 4 or more years of experience
- Ability to demonstrate an expertise and knowledge of databases, networks, hardware, firewalls, and encryption
- Aptitude in solving problems independently
- Strong verbal and written communications
- Sound decision-making ability
- Ability to pass a background check

Chief Quality Assurance and Production Officer

The Chief Quality Assurance and Production Officer (QAO) reports to the CEO and will be involved in decision making related to changes to policies and processes. Guided by the Quality Assurance Plan, he or she will facilitate improvements to plans, products, and systems within the company in response to employee, customer, and regulating authority feedback. Among other things the QAO will oversee implementation of the Company's Standard Operating Procedures related to growing, producing, testing, and dispensing marijuana and marijuana related products. The Company's Standard Operating Procedures in this regard are attached hereto at **Appendix A**.

Responsibilities include, but are not limited to:

- Working closely with the Chief Compliance Officer and other managers to monitor and improve Standard Operating Procedures.
- In departments that utilize mechanical equipment, working with managers and employees to develop step-by-step procedures and maintenance logs for the use, sanitation, and inspection of each item.
- Assisting managers with employee training by preparing instructional materials, hands-on exercises, and evaluation tools.
- Complementing training conducted by other managers by providing in-person training on issues related directly to quality control.
- Fostering a spirit of cooperation, respect and professionalism among employees and other executives.
- Monitoring the introduction of new systems, equipment, and products, such that potential quality issues may be identified prior to the implementation of new processes.
- Maintaining an awareness of regulations related to SOPs and product quality control.
- Maintaining an updated source for all current policy and procedure documents in both paper and digital format and ensure easy access to employees at all levels.
- Working with department managers to conduct job risk analyses and make training and procedure recommendations based on the results.
- Performing a periodic analysis of reports and production data to identify problematic patterns and recommend updates or changes to policies and procedures.
- Assisting with regulatory inspections.
- Implementing procedures related to adverse events and recalls according to the Quality Assurance Plan.
- Staying up to date on quality-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other quality assurance experts.

Requirements:

- 3 - 5 years of experience in Quality Assurance in a related field or a BA degree in Quality Assurance from an accredited institution and 1 - 2 years of experience
- Experience in employee training
- Aptitude in solving problems independently
- Strong verbal and written communications
- Ability to think critically and logically in applying systems and processes to meeting company goals
- Ability to pass a background check

Facilities Manager

The Facilities Manager (FM) reports to the CEO and is responsible for building maintenance, environmental controls, operations and safety, janitorial services, sanitation, storage and maintenance of chemicals, and non-cannabis waste management. Building maintenance and waste management will be conducted in accordance with the requirements of 935 CMR 500.105 12(b) relative to waste disposal and the requirements of G. L. c.21, § 26-53 and in accordance with 314

CMR 3.00, 314 CMR 5.00, 314 CMR 12.00 and 40 CFR Part 122 among other waste water disposal regulations.

Responsibilities include, but are not limited to:

- Maintaining lighting, HVAC, and mechanical systems in excellent working condition.
- Coordinating with the Security Manager to maintain the function and safety of the facility's hardware and infrastructure.
- Managing a budget associated with facilities functions.
- Hiring, managing, and training facilities staff.
- Creating and implementing task-specific SOPs and carrying out job risk analyses with the assistance of the Quality Assurance Officer.
- Being aware of federal, state, and local regulations related to cannabis business premises requirements.
- Being familiar with state and local building code and permit regulations.
- Developing a maintenance and inspection schedule for all building and infrastructure systems.
- Conducting or overseeing the routine maintenance and inspection of environmental and other major systems critical to the operation of the organization.
- Developing and maintaining logs and checklists to simplify maintenance and inspection activities.
- Scheduling and facilitating required inspections by outside organizations.
- Determining which types of work can be handled by company personnel and under what circumstances an outside contractor must be called in.
- Serving as the lead responder to critical equipment malfunctions, including the maintenance of a list of critical equipment and phone numbers to call in case of breakdowns.
- Maintaining an on-site inventory of selected equipment parts to facilitate rapid repairs in the event of a malfunction.
- Working with the Security Manager to support the maintenance of security systems.
- Managing chemicals, non-cannabis waste and other refuse.
- Training facilities employees in the proper procedures for handling and disposing of chemicals, including the [Globally Harmonized System](#) of Classification and Labeling of Chemicals (GHS) and the use of Safety Data Sheets (SDSs).
- Keeping records of training for each training module related to chemicals and non-cannabis waste management for every facilities employee, including the date training occurred, type of training, the signature of the employee upon completion of training, the signature of an authorized person who can verify completion of training, and the date retraining is due.
- Forwarding all records and logs to the Record Keeping Manager
- Becoming familiar with all company Standard Operating Procedures to identify areas in which the Facilities Department may support other business activities.

Requirements:

- At least 5-10 years of building/facilities management experience, including repairs to mechanical and structural components

- Experience with electrical, HVAC, lighting, plumbing, ventilation and other infrastructure component installation and adjustments
- Experience working with outside vendors and contractors
- Excellent organizational, planning, and problem-solving/troubleshooting skills
- Must be able to work independently with limited supervision

Chief Financial Officer

The Chief Financial Officer (CFO) will be responsible for finances and accounting, as well as overseeing activities carried out by the Sales Manager.

Responsibilities include, but are not limited to:

- Performing the day-to-day, monthly, and year-end operations of the Accounting/ Finance Department.
- Assisting the CEO on all strategic and tactical matters as they relate to budget management, cost-benefit analyses, and forecasting needs for and the securing new funding.
- Managing the sales operation of the company through the supervision of a Sales Manager.
- Fostering a spirit of cooperation, respect, and professionalism among employees and other executives.
- Creating financial reports such as P&L, Balance Sheet, Cash Flow, and budget performance.
- Presenting and interpreting financial data for the Executive Staff and the Board of Directors.
- Ensuring compliance with applicable standards, rules, regulations, and systems of internal control.
- Performing the processing and recording of accounts payable transactions.
- Ensuring that all invoices and staff reimbursements are paid accurately and in accordance with standard practices.
- Managing the processing of cash receipts and the recording of revenues and receivables.
- Ensuring that revenues and receivables are correct and maintained.
- Preparing and recording taxes for the company (Sales, Payroll, Local) and coordinating with the Company's Certified Public Accounting firm (the "CPA") regarding preparation of the Company's local, state, and federal tax returns.
- Performing the processing of functional and benefits expense allocations, monthly accruals, amortization of prepaid expenses, depreciation of fixed assets, and recording and reclassification of journal entries, if necessary.
- Performing general accounts analyses and reconciliations, including bank statements, fixed assets, employer's benefit costs, accruals, and prepaid expenses.
- In cooperation with the CCO and the ICM, ensuring that the Point-of-Sale System is fully integrated into the Inventory Control System and assuming responsibility for its accuracy and maintenance.
- Staying up-to-date on finance-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other

finance/accounting experts.

Requirements:

- At least 5 years of experience in accounting for a similarly sized business and a BA degree in Business or Accounting; an accounting firm background is preferred
- If less than 3 years of experience in sales, willingness to attend training related to management of sales personnel
- Expert knowledge in accounting software, to be determined as the vendor has not yet been selected
- Strong organizational skills and ability to prioritize workload to meet tight deadlines in a fast-paced and dynamic work environment
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management
- Excellent analytical and problem-solving skills
- Proficient in Microsoft Office (Word, PowerPoint, Excel)
- Highly detail-oriented and proficient in record keeping
- Team player and able to collaborate with others in the organization.
- Ability to pass a background check and obtain licensing as a Massachusetts Registered Marijuana Establishment Agent

Sales Manager

The Sales Manager reports to the CFO and will serve as the lead in developing sales and marketing strategies that will result in success in a highly competitive industry. A candidate having existing contacts with established businesses will be given preference.

Responsibilities include, but are not limited to:

- Working with the executive team to develop a sales/marketing strategy and identifying potential customers.
- Maintaining vendor and client databases and relationships.
- Attending and exhibiting at trade shows.
- Developing new business relationships in line with the Company's strategy.
- Gathering related sales data, conducting analyses, and refining the strategy as needed.
- Having a detailed understanding of inventory and prices.
- Guiding the Company's marketing strategy based on vendor and consumer feedback.

Requirements:

- At least 21 years of age
- A minimum of 3 to 5 years of sales experience in a related industry, previous experience in the cannabis industry preferred
- Strong background in developing business relationships
- Articulate, with effective verbal and written communication skills
- Proficiency with sales management and presentation tools

- Ability to pass a background check Ability to pass a background check and obtain licensing as a Massachusetts Registered Marijuana Establishment Agent

Director of Production

The Director of Production reports to the Chief Quality Assurance and Production Officer and is responsible for the overall management of cultivation and manufacturing activities.

Responsibilities include, but are not limited to:

- Managing the budgets, overall supply chains, and operations of the Company's cultivation and manufacturing activities.
- Implementing the cultivation and manufacturing plans, primarily through the hiring and supervision of the Cultivation and Manufacturing Managers.
- Ensuring product safety and working with other department heads to comply with regulations and required security, inventory control, and other procedures.
- Preparing reports on production, expenses, product quality, safety, etc.
- Analyzing report results and preparing recommendations for improvements.
- Presenting data to the other Executive Staff and to the Board of Directors, as requested.
- Maintaining inventory levels to ensure timely delivery of products to customers.
- Researching new technologies that may improve efficiency, safety, and productivity and making recommendations to Executive Staff.
- Regularly meeting with Managers and the Quality Assurance Officer to discuss potential new technological ideas, improve procedures, and ensure compliance with regulations.
- Fostering a spirit of cooperation, respect, and professionalism among employees and other executives.
- Staying up to date on cultivation/manufacturing-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other experts.

Requirements

- A minimum of 3-5 years of experience in cannabis cultivation or manufacturing management and leadership experience, including agricultural, pharmaceutical, or herbal medicine industries; BA degree in a manufacturing or agricultural production field preferred
- A basic understanding of the processes involved in both cultivation and manufacturing, knowledge of the cannabis industry preferred
- Strategic planning and business development experience
- Ability to resolve problems with and between employees in a respectful and fair manner, based on sound human resources principles
- Ability to demonstrate experience in improving production and efficiency
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management

- Ability to quickly become familiar with all regulations and Standard Operating Procedures and monitor regulatory updates
- Ability to be licensed as a Massachusetts Registered Marijuana Establishment Agent

Cultivation Manager/IPM Manager

The Cultivation Manager reports to the Chief Quality Assurance and Production Officer and manages a team of cultivation staff members in the production of high-quality medicinal cannabis plants and products.

Responsibilities include, but are not limited to:

- Managing a team that handles all aspects of daily cultivation activities in a medicinal marijuana indoor grow and manufacturing facility.
- Outlining specific roles and responsibilities for plant technicians and working with management to build a team.
- Creating and implementing task-specific SOPs and carrying out job risk analyses with the assistance of the Quality Assurance Officer.
- Providing weekly reports to the Director of Production and making suggestions for improving cultivation systems.
- Maintaining indoor plant growing protocols, developing and testing nutrient regimens, and striving to improve planting techniques and yields.
- Observing the overall health of live plants and executing the pest management program to eliminate all types of mold, powdery mildew, spider mites, root aphids, fungus, gnats, etc.
- Working with the Inventory Control Manager to perform all cultivation tracking with the inventory control system, in compliance with rules and regulations.
- Managing plant scheduling to accurately project all growing requirements on a daily, weekly, and monthly basis to maximize high-quality yield and to provide a steady and consistent supply of product.
- Scheduling, managing, and overseeing cloning processes, achieving a minimum 90% success rate.
- Managing the maintenance of irrigation, climate control systems, cleaning, sanitation, and hazard action plans, and alerting management if there are issues.
- Inspecting the facility to identify systems, building components, or equipment that may need repairs or adjustments.
- Training employees in task-related processes, problem-solving, and health and safety issues.
- Fostering a spirit of cooperation, respect, and professionalism among employees and other managers.
- Ensuring that logs and other records are forwarded to the Record Keeping Manager.
- Working closely with the Quality Assurance Officer on quality control and regulatory issues and on monitoring and improving the implementation of standard operating procedures.
- Collaborating with the Security Manager to ensure the security of the growing area, resulting products, and cultivation records.

- Being prepared to meet with state and local regulatory officials to facilitate inspections and audits.
- Maintaining records such that requests for information from regulating authorities or law enforcement can be met by required deadlines.

Requirements:

- Completion of a course in Plant Pathology from an accredited institution with the equivalent of a B or better as a final grade
- A minimum of 1-3 years of experience managing a cannabis cultivation facility
- Experience developing task-specific procedures and training employees
- Mastery of all grow mediums and irrigation methods
- Experienced in cloning, transplanting, defoliation, super cropping, topping, flushing, pest management, harvesting, drying, trimming, waste disposal and inventory management
- Knowledge of large-scale medicinal cannabis plant growing, including crop rotation management, nutrient requirements, mediums, light requirements, and environmental controls
- Knowledge of plant diseases, pests, nutrient deficiencies, and toxicity
- Advanced knowledge of the cannabis plant and its genetics
- Knowledge of industry best-practices and current on new techniques with respect to the nutrient needs of individual strains and high yield recipes
- Strong attention to detail, ability to communicate clearly
- Ability to pass a background check and Ability to be licensed as a Marijuana Establishment Agent under 935 CMR 500.105 (2).

Training Policies

The Executive Staff are responsible for ensuring that all training required by the Plan, 935 CMR 500.105 et seq., and the Company's standard operation , , is provided at no cost to the employee as required by state regulations.

The Chief Quality Assurance and Production Officer will also evaluate and identify areas where specified training is lacking, create or advise on providing new training topics and training activities as needed, and assist in modifying the Company's procedures to thereafter require the new training.

The Chief Compliance Officer will designate an employee to keep track of training completion and the frequency of repeated training, as well as manage a reminder system to keep employees informed of due dates of future training.

All employees will have records of training held on site in the administrative offices and archived in the document retrieval system.

The Training Matrix in Appendix C provides a list of training topics and the related operating plan that may be consulted for further details.

Manager Training

The Company will provide the training to managers in the areas of hiring, training, and performing evaluations as they pertain to the Company's general staffing needs and the Diversity Plan. Managers are encouraged to suggest additional training topics as needs arise.

Best Practices in Hiring

In order to ensure a hiring strategy that is consistent and compliant with legal requirements, the Company's general staffing needs, and the Diversity Plan, and which attracts and keeps high quality employees, managers will be trained in the following:

- Providing an environment in which employees feel respected and appreciated for quality work.
- Utilizing a variety of recruiting resources, including but not limited to collaborating with the Massachusetts Cannabis Control Commission and the Massachusetts Department of Education and Training , recruiting agencies, job fairs, placement departments at training agencies, posting on online career websites, etc.
- The importance of evaluating internal and external business trends to estimate the number and types of employees needed. Internal factors include changes in work shifts, workforce demographics, and downsizing. External factors include a merger or acquisition, changes in legislation, etc.
- How to write and update job descriptions, including required qualifications, particularly noting whether the position requires skills that have already been learned or if on-the-job training is appropriate. Preparation should include asking the following the questions:
 - (a) what skills, knowledge, and abilities are required for the job;
 - (b) what are some of the characteristics of the people who succeed or fail in the job;
 - (c) what qualifications are needed for the job; and
 - (d) how does the job relate to others.
- To avoid illegal screening of applicants with disabilities, list job duties describing only what the necessary tasks are, rather than how the tasks are normally performed.
- The need to develop an interview guideline to ensure a similar process is used during all interviews for the same position. The guideline should include standardized questions given in a specific order, a relatively controlled length of time for the interview, and a standardized evaluation form to be filled out by the interviewer.
- Take into account that people may feel anxiety during a formal interview, which may misrepresent their true potential.
- Clearly communicate to potential employees the salary, work schedule, and potential future opportunities within the company to reduce misunderstandings after hiring.

- Ask appropriate questions during the interview process to match a potential employee's likes and dislikes with a position that fits their personal preferences.
- Limitations on what an interviewer may ask related to age, marital status, disabilities, etc., to be in compliance with regulations.
- If any pre-employment testing is utilized, only testing instruments may be used that are clear and understandable, have been demonstrated as valid for the skills being assessed, and are appropriate for the target population.
- References must be checked and adequately documented.
- All documentation is forwarded to the Record Keeping Manager.

Effective Training Techniques

- Provide adequate training to employees prior to their first day of work.
- Utilize a variety of instruction methods, such as writing on a board, digital presentations, viewing videos, storytelling, etc.
- Involve students interactively through the use of quizzes, small group activities, case studies, Q&A sessions, question cards, role playing, physical demonstrations, identifying problems in a scene, etc.
- Where appropriate, hands on training is preferred to other methods.
- Upon hiring new employees after the business has started operations, match experienced personnel with beginners to provide support when questions or emergencies arise.
- Each in-person training session must have a sign-in sheet that is used to document the employee's fulfillment of a training requirement. The sheet should include the name of the training module, the date training occurred, the signature of the employee upon completion of training, the signature of an authorized person who can verify completion of training, and the date retraining is due. The completed sheet is forwarded to the Chief Compliance Officer (CCO) and the Record Keeping Manager.

Evaluating Employees

- Carry out regular evaluations to provide positive feedback to workers and identify areas where more training or effort on the part of the employee may be needed.
- Design the evaluation such that an employee feels more confident about doing his/her work after the meeting.

- Avoid stereotyping an employee by gender, culture, disability, etc., which can lead to a misinterpretation of an employee's responses or behavior during an evaluation.
- In addition to annual performance reviews, managers may wish to carry out more frequent "check-ins" to learn about employee concerns and suggest small modifications to processes.
- Prior to an evaluation:
 - Select a private location for the evaluation that will reduce potential interruptions.
 - Schedule an appointment with the employee, giving him/her enough time to prepare. Provide the employee with his/her job description and have the employee prepare a short self-evaluation. The employee may already be aware of shortcomings in his or her work that need to be addressed.
 - Review the employee's file, including results of prior reviews.
 - Review any datasets that provide information on the employee's work effort, such as sales results or productivity indicators.
 - Compile any information that has been learned from communication with supervisors or coworkers that may need to be addressed during the meeting.
 - Identify accomplishments for which the employee deserves positive recognition.
 - Prepare a list of questions to ask to help identify areas that may need improvement and to gauge the employee's job satisfaction.
 - If an employee's performance needs to improve, decide ahead of time if it will be a verbal or written warning. Verbal warnings should be documented in the employee's file. If a written warning is appropriate, prepare a detailed list of expectations based on policies and procedures that will need to be met. This may be presented as a Notice of Needed Improvements (Appendix D).
- If an employee makes any negative comments or becomes emotional, view it as an opportunity to learn about a concern. Do not be critical of an employee's emotions. The conversation should be refocused on facts rather than assumptions or feelings. The evaluator should work with the employee to identify a solution to the problem, if not during the meeting, then as soon as possible thereafter.
- Do not insult an employee. Concerns about his or her work must be presented honestly, and simply described as the need to meet specific expectations.
- Explain to the employee what the impacts are of his/her inappropriate behavior.
- Employees should be given an opportunity to improve performance before written disciplinary documentation is placed in his/her file. Find out if repeated tardiness, extensive periods of time on the phone, or other behaviors are due to difficulties that could be helped with counseling or other assistance.
- Prior to implementing a disciplinary procedure, the manager should verify the facts regarding the misconduct and confirm the company's policy on the issue.

- If the employee has been provided with a list of needed improvements, both the manager and the employee should sign and date it. A copy should be given to the employee and the original placed in the employee's file. The manager should follow up with the employee and give positive feedback if appropriate or review the disciplinary procedure and next steps that will occur.
- The Disciplinary Policy in the Employee Handbook should be written with a clear understanding of the rights of the employee, which can vary by state, and may also be subject to terms of a Labor Agreement.
- Managers are responsible for consistently following the policy and all legal requirements.
- During a meeting that involves a disciplinary action, the employee should always be given an opportunity to give his/her point of view. Give the employee up to a week to write a response. The response should be maintained as part of the employee's record. The employee may request that a manager from a different department review the evaluation documentation and response.
- Reassignment or suspensions may be appropriate in the case of behavioral issues or severe conflict in which the employee has to be removed from a situation immediately, but termination isn't called for. Reassignment refers to retraining (rehabilitative). Suspension means some condition must be met before the suspension is over or the employee is terminated (punitive).
- Decisions to suspend or terminate an employee must be reviewed and approved by a member of the executive staff, or by the Board of Directors if the employee is on the executive staff.

Appendix A: Hiring Tracker

Funded: Money has been allotted to cover salary, benefits, equipment needs, etc.

Hire Goal: Number of people needed to fill positions.

Hiring Budget: Amount allocated for time commitments, job website fees, recruiting agency fees, job fair fees, etc.

Status: Job Description Complete; Position Posted; Interviewing; Intake Process in Progress; Completed.

Assigned To: Person responsible for ensuring process is completed.

Position	Funded (Y/N)	Hire Goal	Hiring Budget	Status	Assigned To	Comments
Chief Executive Officer		1	\$			
Chief Compliance Officer		1	\$			
Security Manager		1	\$			
Security Staff		5	\$			
Computing Security Manager		1 (part-time)	\$			
Inventory Control Manager		1	\$			
Inventory Control Staff		2	\$			
Record Keeping Manager		1	\$			
Chief Financial Officer		1	\$			

Position	Funded (Y/N)	Hire Goal	Hiring Budget	Status	Assigned To	Comments
Sales Manager		1	\$			
Facilities Manager		1	\$			
Facilities Staff		2	\$			
Quality Assurance Officer		1	\$			
Quality Assurance Staff		1	\$			
Director of Production		1	\$			
			\$			
			\$			
			\$			
			\$			
Totals			\$			

Appendix B: Employee Intake Form Checklist

Employee Name: _____

Position: _____ Position Code: _____

Hire Date: _____

Document	Original in File	Dept. to Receive Copy	Date Copy Sent	Person Responsible	Date Forwarded to Record Keeper
Job Description					
Resume					
Employment Application					
Authorization to Conduct Checks					
Background Check					
Reference Check Documentation					
Offer Letter					
Insurance Acceptance Form		Insurance Co.			
Computing Security Agreement*					

Document	Original in File	Dept. to Receive Copy	Date Copy Sent	Person Responsible	Date Forwarded to Record Keeper
W-4		IRS			
Direct Deposit Form		Bank			
Personal Data Form					
Form I-9		IRS			
State Income Tax Form		State Income Tax Dept.			
Key/Key Card User Agreement*					
Driving Agreement (Drivers Only)					

*Available in the Security Plan

Appendix C: Training Matrix

Referenced Operating Plan (Column 3) C = Cultivation Plan DT = Distribution & Transportation E = Employee Handbook H = Health & Safety Plan I = Inventory Control Plan O = Odor Control Plan Q = Quality Assurance Plan R = Record Keeping Plan S = Security Plan ST = Staffing & Training W = Waste Management Plan OT = Other	Key to Employee Types (Columns numbered 1-8) 1 All Employees 2 Managers 3 Security Personnel 4 Cultivation Employees 5 Manufacturing Employees 6 Packaging and Labeling Employees 7 Transportation Employees 8 Distribution Employees
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Training Topic	Brief Description	Plan	1	2	3	4	5	6	7	8
Effective Training Techniques	Instruction methods, student interaction, documentation and record keeping	ST		X						
Best Practices in Hiring	Writing job descriptions, preparing for an interview, regulations guiding interview questions	ST		X						
Evaluating Employees	Fair evaluations, preparing for a meeting, dealing with unsatisfactory performance	ST		X						
Reg-Federal Regulations	Information from the Wage and Hour Division of the U.S. Department of Labor; OSHA workplace injury documentation	OT	X							
Reg-State Regulations	[Add link to State Regulations]	OT	X							
Reg-Local Regulations	[Add link to Local Regulations]	OT	X							
Reg-Environmental Regulations	[Add link to Environmental Regulations]	OT	X							
Sensitive Records	Definition, storage requirements, access, computing security, retention policy	R,S	X							
Employee Orientation	Policies, pay, benefits, evaluations, suspension, disciplinary procedures	E	X							
Emergency Preparation	Good housekeeping, prevention, engineering controls, finding emergency numbers, practice and drills	S	X							
CPR/1st Aid (Encouraged for all)	Recognizing and responding to a variety of medical situations, when to call for help	S		X	X					
Emer-Armed Robbery	Appropriate response, silent alarm, noticing details, notifying management, contacting law enforcement	S	X							

Training Topic	Brief Description	Plan	1	2	3	4	5	6	7	8
Emer-Burglary	Avoiding affected areas, notifying management, contacting law enforcement	S	X							
Emer-Other Security Breaches	Types, risks, response procedures, notifying management, contacting emergency responders	S	X							
Emer-Medical Emergencies	Notifying person on staff with CPR/1st Aid training, notifying management, contacting emergency responders	S	X							
Emer-Fire Emergencies	Evacuation procedure, fire extinguishers, notifying management, contacting emergency responders	S	X							
Emer-Evacuation Procedure	Panic alarm, routes of egress, closing doors, safely maintaining secured areas, designated meeting place, notifying management, contacting emergency responders	S	X							
Emer-Drills and Emergency Exercises	Schedule, expectations, procedures, follow-up training	S	X							
Observation and Incident Reporting	Identifying behavioral cues, vulnerable areas needing extra security, reporting an issue	S	X							
Types of Diversion	Internal, customer, robbery, other potential issues	S	X							
Diversion Prevention	Inventory Control System, limiting access, reducing diversion opportunities, signage	S	X							
Diversion Response Procedures	Incident reporting, audits, notifying regulators and law enforcement	S	X							
Inventory Control System	Purpose, UID labels, system use, control points, system security, regulations, restrictions, notifications	I	X							
Inventory Procedure	Employee responsibilities, changes in disposition, storage of un-inventoried items, receiving, transfers, surveillance, maintaining inventory control if access to the system is lost	I	X							
Certified Scales	Purpose, proper use, calibration, maintenance, logs	I				X	X	X		X
Inventory Reporting	Accessing reports from the inventory control system, regularly scheduled reports, responding to requests from regulators/law enforcement, system backups	I		X						

Training Topic	Brief Description	Plan	1	2	3	4	5	6	7	8
Inventory Validation	Regulations, schedule, responsibilities, logging discrepancies, record keeping	I			X	X	X	X	X	X
Inventory Discrepancy Procedure	What qualifies as a discrepancy, audits, logs, reporting, record keeping	I			X	X	X	X	X	X
Storage Access and Procedures	Storage requirements, access controls, surveillance, logs, record keeping	S	X							
Transferring between Control Points	Procedure, inventory control, contamination controls, surveillance	S,I	X							
Receiving Controlled Products	Security at receiving location, security logs, entering received products into inventory control, storage of un-inventoried items	S,I	X							
Entry into the Inventory Control System	Original UID tag assignment, required information, changes in disposition, control points, waste management, transfer off premises	I				X	X	X	X	X
Quarantine Protocols	When quarantine is required, storage requirements, quarantine, inventory control, removing from quarantine	C				X	X	X		X
Shutdown Procedures	Responsibilities, tasks,	H	X							
Computing Security	Access, user agreement, preventing malware attacks	S	X							
Incident Command System (ICS) Training	Integrated management of command, operations, planning, logistics, intelligence & investigations, finance and administration - provided by a 3rd party	S			X					
National Incident Management System (NIMS) Training	Integrated management of incidents, hazards, natural disasters, and other impacts - provided by a 3rd party	S			X					
Employee Access to Premises	Badging, access levels, access codes, restricted areas, access termination	S	X							
Non-Employee Access to Premises	Visitor badging, logs, escorting visitors, record keeping	S		X	X					
Alarm Systems	Regulatory requirements, operation, maintenance, alarmed locations, logs	S		X	X					
Video Surveillance Systems	Equipment, operation, maintenance, procedures, retrieval, retention	S		X	X					
Vault/Safe Access	Physical requirements, access procedures and logs, surveillance	S		X	X					
Closing Procedure	Closing checklist, facility map, checking locks and security equipment, procedure for broken locks or systems	S		X	X					

Training Topic	Brief Description	Plan	1	2	3	4	5	6	7	8
Safety Committee	Purpose, responsibilities, procedure reviews, soliciting comments from staff, staying informed on issues	H	X							
Tool and Equipment Safety	Training on safe use of tools and machines	H	X							
Facility Safety Rules	Evacuation procedures, maintaining safe paths of egress, emergency equipment maintenance	H	X							
Hazard Management	Recognizing hazards, inspections, unsafe work practices, reporting	H	X							
Job Hazard Analysis	Purpose, responsibilities, frequency, process, updating procedures	H	X							
Safety Data Sheets (SDSs)	Globally Harmonized System, purpose, sections, hazard pictograms, hazard communication	H, C	X							
Chemical Container Labeling	SDSs, requirements, symbols, signal words, hazard statements	H	X							
Personal Protective Equipment (PPE)	Purpose, proper use, maintaining supplies, SDS information	H	X							
Chemical Spill Response	Incidental vs. non-incidental spills, PPE, clean up supplies, identifying potential risk to the environment	S or H	X							
Respiratory Protection	Proper equipment and use, respiratory risks, SDSs	H				X	X			
Protecting the Environment by Monitoring Water	Regulations, testing procedures, logs and record keeping, modifying pH	W				X	X			
Ladder Safety	Types of ladders, safe use, 3 points of contact	H	X							
Heat Stress	Risks, identifying symptoms, response procedure	H				X	X			
Poison Control	Sources of poisons, response procedure, posting of Poison Center phone #	H	X							
Safe Lifting	Body positioning, when to ask for help or use equipment, PPE	H	X							
Lockout System	Taking equipment out of service, responsibilities, lockout removal procedure	H		X		X	X	X		
Fire Extinguisher Use (Encouraged for all)	Locations, PASS, safety precautions	S		X	X					
Electrical Safety (as needed)	Risks, precautionary measures, PPE, advanced equipment lockout	H								
Basic Safety Rules	Housekeeping, obeying signs, training, following procedures, etc.	H	X							

Training Topic	Brief Description	Plan	1	2	3	4	5	6	7	8
Sanitation	Frequency, process, PPE	H	X							
Logs and Record Keeping	Purpose, types, document retrieval system, retention	R	X							
Equipment	Proper use, maintenance, inspections, repairs, lockout, contamination issues, logs	C,M,P				X	X	X		
Driving Safety (+ All Company Drivers)	Awareness, space between vehicles, driving in heavy traffic and inclement weather, what to do when an accident occurs	T							X	
Product Testing		Q				X	X			
Testing Sample Preparation	Purpose, selecting samples, record keeping	Q				X	X			
Bloodborne Pathogens	Response procedure, Hepatitis B	H	X							
Storage Requirements (temp, humidity, etc.)	Environmental conditions of finished flower and associated products and materials	C		X		X	X	X	X	X
Processing	Processing stages, environmental conditions	C				X				
Methods of Cultivation	Plant stages, seeds vs. cloning, lighting requirements	C				X				
Plant Inspection	Daily checklist, logging plant and environmental conditions, pest management	C, Q				X				
Tracking Lots and Plants	Managing seed and cutting lots, applying UIDs, cross referencing to cultivation records	C				X				
Media	Media types and watering methods	C				X				
Cultivation Equipment	Types and purpose	C				X				
Fertilizers	Procedure for administering nutrients	C				X				
Seed Propagation		C				X				
Clone Propagation	Required attire, tool preparation, procedure, monitoring	C				X				
Vegetative Growth and Flowering	Definitions, light requirements, length	C				X				
Harvesting	Process description, cautions	C				X				
Job-specific Risks and Emergencies	Specific types of accidents that may occur, use of job risk analysis, managing changes in workflow or processes, updating procedures	M	X							

Training Topic	Brief Description	Plan	1	2	3	4	5	6	7	8
Good Manufacturing Practices	Risk analysis and management, quality assurance, safety, existing guidelines	M					X	X		
Working with Solvents	SDSs, potential health hazards, evaluating exposure, engineering controls, PPE, containers and labeling, reuse	M					X			
Extraction Methods	Types of extracts, chemistry, working with heating elements, working with batches, inventory control, scales and other equipment, workflow, safety, sanitation, storage	M					X			
Mixing	Working with batches, inventory control, ingredients, scales and mixing equipment, safety, sanitation, storage	M					X			
Infusion Methods	Working with heating elements, working with batches, inventory control, ingredients, scales and infusion equipment, safety, sanitation, storage	M					X			
In-process Sampling and Controls	Selecting a sample, preparing a sample, homogenization, workflow, inventory control, procedures for failed samples, record keeping	M					X			
Food/Ingredient Safety and Storage	Perishables, variations in shelf life, effects of heat, light, and oxygen	M					X	X		
Remediation	Working with batches, inventory control	M				X	X			x
Equipment Inspection	Risks of working with equipment, maintenance procedures, maintenance and repair logs, sanitation, record keeping	C,M,P				X	X	X		
Contamination Control	Routes of contamination, sanitation, PPE and other engineering controls,	C,M,P				X	X	X		
Expirations/Time Limits	Effects of heat, light, and oxygen, determining expiration dates, managing expired products, inventory control	Q				X	X	X		X
Batch Management	Understanding batches, when/if batches can be mixed, inventory control issues, logs and record keeping	I				X	X	X		X
UID Issuance and Control	Procuring and secure storage of UID tags	I				X	X	X		X
Label Design	Avoiding appealing to children, label requirements, proofing	P						X		
Packaging and Labeling Procedures	Ensuring accurate and complete label information in accordance with state law	P,Q						X		X
Quality Control	Responsibilities, sampling and testing, adverse events and recalls, changes to procedures	Q	X							

Training Topic	Brief Description	Plan	1	2	3	4	5	6	7	8
Interacting with Regulators		S		X	X					
Interacting with Law Enforcement		S		X	X					
Returns, Complaints, Adverse Events, and Recalls	Who to notify, response procedures, logs and record keeping	Q		X						
Waste Management	Regulations, collection and storage, inventory control, disposal	W	X							
Product Dosage, Strengths, and Metabolism	Differences in product types, CBD vs. THC	M					X			
Methods of Ingestion	Types of products, pros and cons	M					X			
Strain Characteristics and Effects		C				X				
Reducing Impacts on the Community		H	X							
Accessing Procedures	Where to find most recent versions of procedures	Q	X							
Ensuring Integrity of Shipments	Inventory control, environmental controls, sealing cases and containers	T							X	
Shipment Manifests	Requirements, responsibilities, producing a manifest, confirming manifest accuracy	T							X	
Transportation Route Selection	Route considerations, safety, traffic, obeying laws, procedure for deviating from planned route	T							X	
Transportation Procedures	Staffing requirements, responsibilities, vehicle requirements, security, delivery at customer facility, reporting problems	T							X	
Management of Accidentally Opened Product Packaging		P	X							
Preventing Access to Children		P						X		X
Odor Control	Definitions, mitigation, procedures, physical measures and equipment, system maintenance	O				X	X	X		
Workplace Violence Policy	Expectations, reporting new or potential incidents, disciplinary action	S	X							

Appendix D: Notice of Needed Improvements

Employee Information

Name: _____

Date: _____

Employee ID: _____

Position: _____

Manager: _____

Warning Status

____ First Warning

____ Second Warning

____ Final Warning

Area of Needed Improvement

____ Lateness/Leaving Early

____ Low Productivity

____ Skipped Shift

____ Procedure Violation

____ Inappropriate Behavior

____ Other: _____

Description of Issue, including date and time of a specific incident if applicable:

Needed Improvements:

Acknowledgements

By signing this form, I verify that I understand of the types of improvements needed as specified above. I also understand that making these improvements is necessary to avoid possible disciplinary action. If I do not agree with the information documented in this form, I may write a reply and have it placed in my file attached to this form and have the information reviewed by a second evaluator.

Employee Signature: _____ Date: _____

Evaluator Signature: _____ Date: _____

Witness if employee does not sign: _____ Date: _____

Appendix E: Personal Vehicle Driving Agreement

Employees may be requested to operate their owned, leased, or rented vehicle to conduct the Company's business.

The Company does not assume any liability for bodily injuries or property damage the vehicle owner, driver, or passengers may become personally obligated to pay arising out of such operation. When operating your personal vehicle on behalf of the Company, the following policies must be followed:

- The driver must be determined to meet all Company driver qualification standards described in this agreement before being permitted to operate a personal vehicle on Company business. Failure to continue to meet these qualification standards will result in revocation of the Employee's driving responsibilities.
- The vehicle being operated must have a valid registration, and proof of registration must be kept in the vehicle. Employee drivers must possess a current and valid driver's license on their person at all times while operating the vehicle.
- Automobile insurance meeting the legal minimum requirements of the vehicle's state of registry must be maintained on the vehicle being used, and a valid insurance identification card must be kept in the vehicle. Proof of such insurance must be provided to the Company when the driver is initially added to the Company's driver list and whenever requested thereafter.
- The Company does not specify and assumes no responsibility for any other coverage Employees carry on the vehicles used, but encourages those operating vehicles on behalf of the Company on a regular basis to maintain limits of at least \$100,000 each person/\$200,000 each occurrence for bodily injury and \$100,000 property damage, or a combined single liability (CSL) limit of \$300,000, plus uninsured motorist (UM) and underinsured motorist (UIM) coverage.
- Vehicles should be maintained so as to permit reliable and safe operation. The vehicle owner/driver is responsible for all maintenance and associated costs.
- Seatbelts and other required safety restraints must be used at all times.
- All traffic laws must be obeyed. The Company is not responsible for and will not reimburse Employees for any moving or non-moving violations received as a result of operating a vehicle on behalf of the organization.
- Vehicles may not be operated while the driver is under the influence of alcohol or any other controlled substance, including any prescription or over-the-counter medications that may affect driving ability.

Reporting Requirements

In order to ensure that drivers maintain compliance with the company driver qualification standard, drivers are required to report all moving violations and at-fault accidents, or drivers' license status

changes (suspension, revocation, new license, etc.) to a supervisor within 72 hours of conviction, determination, or status change effective date.

Accidents Involving Use of Personal Vehicles

If you are involved in an accident in your personal or rented vehicle while traveling on business, a claim should be filed with your personal automobile insurance company, as that policy will provide primary coverage. However, the accident should still be reported to your supervisor.

Violations of Policy

Failure to comply with any of these policies may result in suspension of driving responsibilities on behalf of the Company

I have reviewed and received a copy of this Latitude 42 Therapeutics LLC Vehicle and Driving Agreement. I agree to abide by all policies and procedures to ensure safety of myself and the general public, when driving to conduct business on behalf of Latitude 42 LLC.

(Print your first and last name)

Signature

Date

Manufacturing Plan

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Introduction

The Company will, in addition to the cultivation of cannabis, produce cannabis extracts (oils containing high concentrations of THC), and manufacture a variety of products that include cannabis oils as a primary ingredient. The following Manufacturing Plan outlines the expertise, equipment, methods, and quality control practices involved in both the extraction process and the formulation of the Company's THC oil-containing product line.

The Company will follow current Good Manufacturing Practices to assure the identity, strength, quality, and purity of cannabis products by adequately controlling manufacturing operations. This includes establishing strong quality management systems, obtaining appropriate quality raw materials, establishing robust standard operating procedures, detecting and investigating product quality deviations, and maintaining reliable testing laboratories. This formal system of controls helps to prevent instances of contamination, mix-ups, deviations, failures, and errors.

Extraction

Cannabis Extraction involves the stripping of cannabinoid rich oil from raw cannabis buds harvested at the end of a cannabis plant's life cycle. Cannabis oil is popular among medical patients who need to consume higher concentrations of cannabinoids. For MIP production, utilizing cannabis oil to make edible and topical cannabis products is often preferred over cooking with raw buds, because the extraction process removes much of the color, taste, smell, and mass of the plant matter.

The Company's extraction lab will contain approximately five hundred square feet (500 sf). As established by the Massachusetts Cannabis Control Commission, there are currently several generally accepted standard methods of extraction permitted in the medical marijuana industry. The Company shall employ a carbon dioxide (CO₂)—driven extraction system, known to be one of the cleanest and safest methods of extraction. CO₂ is a safe, non-flammable gas that is a particularly effective solvent for the process of THC and cannabinoid extraction. The Company's state-of-the-art CO₂ extraction machine utilizes CO₂ drawn from the same type of storage tanks that are used to store carbonated beer in restaurants and other similar establishments. In the Company's facility, CO₂ flows through an extraction chamber and over the raw plant matter packed inside. At the end of the process, terpene and cannabinoid rich oil is collected in a collection vessel.

The oil is then mildly refined to remove any leftover lipids or plant-derived waxes. The oil is then ready to be divided into doses or infused into edible or topical cannabis products. At no point is there a risk of explosion or combustion during the cannabis extraction process when extracting with CO₂.

The extraction process is aided heavily by modern technology that has been developed, tested, and successfully utilized in the botanical extract (perfume, essential oil, etc.) industries for many years.

The automated technology available in the marketplace today allows the Company to produce the amount of extract that is necessary to adequately supply the Company's dispensary with a line of quality medical cannabis products sufficient to meet the needs of its medicinal patients with a staff of 2-3 full-time extraction technicians.

Marijuana Infused Products

Marijuana Infused Products ("MIPs") are a vital resource for many medical cannabis patients because they allow those who cannot vape or smoke raw buds to safely consume cannabinoids.

Infused products typically fall into two categories, edibles and topicals.

Edible Infused Products

Edible infused cannabis products come in many forms and doses, however in Massachusetts doses are typically less than or equal to 5 milligrams, which is considered the single dose maximum for THC content. Cannabis edibles are typically made to taste good so that consumers with appetite issues or nausea related to medical conditions can easily ingest them. For this reason, gummies, chocolates, and baked goods are popular cannabis edible products.

Topical Infused Products

Topical infused cannabis products like creams and lotions are popular with patients who have joint and muscle pain.

The Company intends to create a line of edible and topical products that appeal only to adult medical cannabis patients and produce them using organic ingredients. Our MIPs will be created in a small scale, traditional style commercial kitchen with stainless steel surfaces and appliances for cleaning purposes. The Company's MIP staff will be trained and practiced in professional commercial kitchen operation and upkeep. A small staff of two to four Infused Product Technicians will be charged with the task of producing and packaging infused products and cleaning and maintaining the roughly five hundred square foot MIP area.

A total of approximately fifteen to twenty-one staff members are projected to operate and maintain the cannabis product production side of the Company's facility in Hull, Massachusetts. This number is based on current industrywide standard operating practices in Massachusetts and is subject to change, given the varying degrees of automation and technology slated for this facility.

In addition to a full-time production staff, a full-time quality assurance manager will be employed and tasked to oversee Company-wide compliance in all aspects of cultivation, extraction, MIP production, and retail.

As a precursor to manufacturing cannabis products, the Company acknowledges that it requires a license from the Massachusetts Cannabis Control Commission for the Company's fully integrated medical cannabis facility, and that the Company will be subject to all of the regulations and operational standards set forth in the currently applicable state regulations, as well as the conditions stated in the license itself. All applicable state and municipal laws, rules, and regulations will be followed in relation to water usage and conservation, energy consumption, environmental protection, security, odor control, quality control, and worker safety.

Roles and Responsibilities

Director of Production

The Director of Production reports to the CEO and is responsible for the overall management of cultivation and manufacturing activities.

Responsibilities include, but are not limited to:

- Managing the budgets, overall supply chains, and operations of manufacturing activities.
- Implementing the Manufacturing Plans, primarily through the hiring and supervision of the Manufacturing Managers.
- Ensuring product safety and working with other department heads to comply with regulations, as well as required security, inventory control, and other procedures.
- Preparing reports on production, expenses, product quality, safety, etc.
- Analyzing report results and preparing recommendations for improvements.
- Presenting data to the other Executive Staff and to the Board of Directors as requested.
- Maintaining inventory levels to ensure timely delivery of products to customers.
- Researching new technologies that may improve efficiency, safety, and productivity and making recommendations to Executive Staff.

- Meeting regularly with Managers and the Quality Assurance Officer to discuss potential new technological ideas, improve procedures, and ensuring compliance with regulations.
- Fostering a spirit of cooperation, respect, and professionalism among employees and other executives.
- Staying up-to-date on manufacturing-related issues and trends by means of periodically reviewing the literature, becoming a member of one or more related organizations, and participating in conferences and/or other means of networking to learn from other experts in the field.

Requirements

- A minimum of 3-5 years of experience in manufacturing management and leadership experience, including pharmaceutical or herbal medicine industries; Bachelor's degree in a manufacturing field preferred
- A basic understanding of the processes involved in manufacturing; knowledge of the cannabis industry preferred
- Strategic planning and business development experience
- Ability to resolve problems with and between employees in a respectful and fair manner, based on sound human resources principles
- Ability to demonstrate experience in improving production and efficiency
- Excellent communication skills, written and verbal, with the ability to clearly communicate issues to all levels of management
- Ability to quickly become familiar with all regulations and Standard Operating Procedures and to monitor regulatory updates

Extraction Manager

The Extraction Manager reports to the Director of Production and manages a team of extraction technicians in the safe and efficient production of high-quality cannabis extracts.

Responsibilities include, but are not limited to:

- Assisting with design and setup of the extraction facility for maximum efficiency.
- Managing a team that handles all aspects of daily extraction activities.
- Creating and implementing task-specific SOPs to be followed by extraction technicians.

- Working closely with the Quality Assurance Officer to carry out task-related risk analyses and to monitor and improve the implementation of SOPs.
- Training employees in SOPs, problem solving, and health and safety issues.
- Ensuring that supplies are ordered in a timely manner to meet production schedules.
- Managing scheduling to accurately project all extraction requirements on a daily, weekly, and monthly basis to provide a steady and consistent supply of product.
- Measuring and maintaining the overall quality levels of the extracted materials, including consistent potency, purity, texture, flavor, etc., by performing in-process and post-process quality assurance testing and conducting visual inspections.
- Running industrial and bench-scale processing equipment for cannabis oil extraction (CBD & THC) from leaf and/or distillate and isolates.
- Working with licensed testing laboratories to ensure chain-of-custody compliance during sample gathering and reporting.
- Working with the Inventory Control Manager to perform all extraction-related tracking with the inventory control system in compliance with rules and regulations.
- Inspecting the extraction facility areas to identify building components or equipment that may need repairs or adjustments. Alerting upper management of any issues that will require an unusual amount of time or expense to address.
- Managing the regular cleaning and maintenance of equipment and facility to keep working areas in sanitary conditions.
- Developing and testing new extraction methods and make suggestions for improving extraction systems.
- Providing weekly reports to the Director of Production.
- Fostering a spirit of cooperation, respect and professionalism among employees and other managers.
- Collaborating with the Security Manager to ensure the security of the extraction area, the resulting products, and the transfer of products.

- Overseeing destruction of marijuana-derivative products.
- Being prepared to meet with state and local regulatory officials to facilitate inspections and audits.
- Ensuring that tracking logs and other records are forwarded to the Record Keeping Manager.
- Maintaining records such that requests for information from regulating authorities or law enforcement can be met by required deadlines.
- Remaining current in the understanding of best practices related to extraction through webinars, conferences, online training, and professional industry networking.

Requirements

- A minimum of 3-5 years of experience managing a cannabis extraction or similar facility
- Experience developing task-specific procedures and training employees
- Detailed knowledge and experience with multiple extraction methods and machinery
- Experience in multiple refinement/purification methods for oil-based extracts
- Expertise in volatile/non-volatile extraction methods, as well as the purification, separation, and isolation of various compounds
- Experience measuring and documenting pharmaceutical-grade product consistency
- Knowledge of common contaminants, their sources and mitigation methods
- Detailed knowledge of state and OSHA health and safety regulations related to extraction activities, safety data sheets, and the Globally Harmonized System of Classification and Labelling of Chemicals
- Experience maintaining the freshness of unstable terpene-rich whole-plant extracted concentrates
- Knowledge of industry best practices and current on new techniques
- Ability to function in a fast-paced, high-demand environment
- Excellent communication skills
- Ability to pass a background check

Chief Product Formulator

Responsibilities include, but are not limited to:

- Assisting with design and setup of the manufacturing facility for maximum efficiency.
- Helping formulate products according to stated business objectives that will react appropriately when consumed by humans and pets.

- Managing a team that handles all aspects of daily manufacturing activities.
- Creating and implementing task-specific SOPs to be followed by manufacturing technicians.
- Working closely with the Quality Assurance Officer to carry out task-related risk analyses and to monitor and improve the implementation of SOPs.
- Training employees in SOPs, problem solving, and health and safety issues.
- Ensuring that supplies are ordered in a timely manner to meet production schedules.
- Managing schedules to accurately project all manufacturing requirements on a daily, weekly, and monthly basis to provide a steady and consistent supply of product.
- Measuring and maintaining the overall quality levels of the manufactured products, including consistent potency, purity, texture, flavor, etc., by performing in-process and post-process quality assurance testing and conducting visual inspections.
- Performing bench scale assays and proof-of-concept experiments.
- Researching and summarizing relevant topics for active work streams and new marketable products.
- Working with licensed testing laboratories to ensure chain-of-custody compliance during sample gathering and reporting.
- Working with the Inventory Control Manager to perform all manufacturing-related tracking with the inventory control system in compliance with rules and regulations.
- Inspecting the extraction facility areas to identify building components or equipment that may need repairs or adjustments. Alerting upper management of any issues that will require an unusual amount of time or expense to address.
- Managing the regular cleaning and maintenance of equipment and facility to keep working areas in sanitary conditions.
- Developing and testing new manufacturing methods and making suggestions for improving systems.
- Providing weekly reports to the Director of Production.
- Fostering a spirit of cooperation, respect and professionalism among employees and other managers.

- Collaborating with the Security Manager to ensure the security of the manufacturing area, the resulting products, and the transfer of products.
- Overseeing destruction of marijuana-derivative products.
- Being prepared to meet with state and local regulatory officials to facilitate inspections and audits.
- Ensuring that tracking logs and other records are forwarded to the Record Keeping Manager.
- Maintaining records such that requests for information from regulating authorities or law enforcement can be met by required deadlines.
- Remaining current in the understanding of best practices related to manufacturing through webinars, conferences, online training, and professional industry networking.

Requirements

- Undergraduate degree in chemistry, chemical engineering, or biotechnology
- Previous experience working with cannabis extracts and/or exceptional knowledge of its properties and how it uniquely reacts when infused into digestible products (oils, sprays, patches, lotions, tinctures, capsules, edibles etc.)
- Thorough understanding of CO2 processing, herbal extraction, distillation, emulsification and semi-solid formulations
- Experience measuring and documenting pharmaceutical-grade product consistency
- Knowledge of common contaminants, their sources and mitigation methods
- Detailed knowledge of state and OSHA health and safety regulations related to manufacturing activities, safety data sheets, and the Globally Harmonized System of Classification and Labelling of Chemicals
- Experience maintaining the freshness of unstable terpene-rich whole-plant extracted concentrates
- Experience with tableting and encapsulation processes
- Knowledge of food safety regulations
- Enthusiasm for both research/computation and hands-on experimentation
- Attention to detail and efficiency in a manufacturing setting
- Ability to function in a fast-paced, high-demand environment
- Excellent communication skills

Manufacturing Overview

In order to satisfy market demand for a variety of cannabis products, the Company will be implementing a combination of extraction technologies. These will include CO2 extraction, hydrocarbon extraction, hash-making, and pre-roll smokable cigarettes. The Company's

manufacturing facility may use other low-tech methods, such as heat, screens, presses, steam distillation, ice water, and other methods without employing solvents or gases to create products such as kief, hashish, bubble hash, or infused dairy butter, or oils or fats derived from natural sources.

High-purity Solvents: We will only utilize solvents approved by the Massachusetts Cannabis Control Commission. These solvents will have a purity of at least 99.5%. We will use the following solvents:

- Carbon Dioxide
- N-butane
- Isobutane
- Propane
- Heptane
- Food grade glycerin, ethanol, or propylene glycol to create extracts

Each of the above solvents produces a different quality and quantity of final product, with different potencies, cannabinoid profiles and textures, resulting in a wide range of final products (The Product list is currently being developed. It will be inserted below in the final plan].

Standard Operating Procedures

The Company's cannabis manufacturing facility will develop Standard Operating Procedures, Good Manufacturing Practices, and a Training Plan prior to producing extracts for the marketplace. A copy of the Company's proprietary Manufacturing Standard Operating Procedures will be available to the CCC, and public health and safety officials upon request. The procedures below outline the general guidelines that the Company's employees will consistently follow to manufacture premium, medical-grade cannabis products.

Security and Safety Guidelines

The general security guidelines to be followed are as follows:²

- The production of cannabis products will be carried out in compliance with state and local laws.
- Law enforcement and regulatory agency personnel will be allowed unrestricted access to the premises during operating hours to monitor compliance with regulations.
- The Company will not employ any person under the age of twenty-one (21) at its cannabis manufacturing facility.

² Further detail on facility security can be found in the Security Plan.

- No person under the age of twenty-one (21) will be allowed on the premises. A sign will be posted at each entrance to the facility informing visitors of these restrictions.
- Members of the public will not be allowed access to the cultivation facility.
- Non-employees who have a reason to be on the premises will only be allowed access according to the procedures in the Comprehensive Security Plan.
- Access to areas in the facility where cannabis products are made, tested, or stored will be restricted and controlled according to the procedures defined in the Company's Security Plan, and the Company's General Operations Plan.
- The Company's cannabis manufacturing facility will have a professionally installed, maintained, and monitored alarm system as further specified in the Company's Security Plan.
- The Company's Director of Community and External affairs shall provide the local police department and other local public safety and health officials with an on-call list of on-site employees that are available on a twenty-four (24) hour basis to answer emergency calls and provide officials with access to the facility, should the need arise. The telephone number provided will be to a live service.
- Compressed gases used in the extraction process will not be stored in containers that exceed a one hundred fifty (150) pound tank in size. The Company's facility will be limited to a total of ten (10) tanks on the property at any time in accordance with the requirements of the Town of Hull Fire Department.
- All entrances and exits to and from the premises, will be monitored by twenty-four (24) hour video security surveillance of at least HD quality with night vision capability. The video security system will be compatible with software and hardware mandated by the Security Plan.

Worker Safety:

In order to ensure worker safety, the Company's cannabis extraction and manufacturing processes will mitigate common risks associated with the handling of cannabis material and extraction and formulation machinery. These risks include:

- Fires
- CO2 gas exposure
- Hearing loss
- Exposure to dust
- Exposure to other harmful vapors

Workers will be trained on fire prevention, as well as the locations of fire safety equipment and associated protocols in the case of an emergency. Personal protective equipment (PPE) will be used at all times, according to safety protocols, including breathing masks, goggles, and ear plugs.

Equipment Standards

- Documentation will be available to certify that each professional-grade system utilized for the manufacture of cannabis products on premises has been professionally designed, safe for its intended use, and built according to standards recognized and generally accepted in good engineering practices. The certification document will contain the signature and stamp of a professional engineer and serial number of the extraction unit being certified.

Potential sources of recognized standards include:

- American Society of Mechanical Engineers (ASME);
 - American National Standards Institute (ANSI);
 - Underwriters Laboratories (UL); or
 - The American Society for Testing and Materials (ASTM).
- Closed loop systems for hydrocarbon or CO2 extraction will bear a permanently affixed and visible model and serial numbers.
 - Closed-loop systems, other equipment, operational methods, and facilities will be approved for their use by the Town of Hull Fire Department and meet any required fire, safety, and building code requirements specified in the Massachusetts State Building Reference Codes.
 - Any person using solvents or gases in a closed looped system to create cannabis extracts or otherwise in the facility will be fully trained on how to use the system and the risks involved in its use, have direct access to applicable safety data sheets, and handle and store the solvents and gases according to established protocols.

Product List (to be Determined)

The Company will manufacture the cannabis products listed in the table below for white labeling to other appropriately licensed cannabis businesses. Products will generally adhere to the following table.

Product Type	Description
Isolates/Distillates	THCA CBD Distillate

Product Type	Description
Concentrates	Dry Sift/Kief Rosin Wax/Shatter Bubble Hash Live Resin Vaporizer Cartridges
Pre-Rolls	Individual Packaged (3 to 8 per package)
Other Derivative Products	Vitamin Supplements Lotions/Ointments Transdermal Patches Pet Health Products
Edibles	Beverages Desserts Crackers/Granola Gummies Infused Edible Oils and Capsules

Packaging Guidelines

The Company will regularly review the applicable regulatory guidelines, 930 CMR 500.105, to ensure all cannabis products are packaged in accordance with the rules set forth by the Massachusetts Cannabis Commission. The Company will comply with these rules and use the following standards for packaging.

- Products are not allowed to be attractive to children or easily confused with candy/foods that do not contain cannabis.
- Packages are required to be tamper-evident, child-resistant, re-sealable, and labeled.
- Every cannabis product must be traced according to assigned unique ID numbers for identification and tracking.

Each cannabis product must be labeled with the following information:

- Date of manufacturing and packaging
- Expiration date
- Known allergens (nuts, etc.)
- Type of cannabis product
- Number of servings per package
- Pharmacologically active ingredients (THC, CBD, etc.) and amount (mg per serving)
- "FOR MEDICAL USE ONLY" (for medicinal cannabis)
- Universal symbol for cannabis
- Government Warning: "GOVERNMENT WARNING: THIS PRODUCT CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS PRODUCTS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. THE INTOXICATING EFFECTS OF CANNABIS PRODUCTS MAY BE DELAYED UP TO TWO HOURS. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS PRODUCTS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION" (in bold print)

Proposed Day-To-Day Extraction Operations

- All manufacturing operations will take place in the designated manufacturing area of the Company's facility.
- Prior to operations each day, technicians will carry out initial equipment inspection, any required maintenance, and sanitation log checks of contact and work areas.
- Daily material allotments will be measured and batched for processing.

- Once the material is verified and logged, it will be carefully loaded into measured containers for extraction preparation.
- [8-14 kg of material will be loaded into the centrifugal ethanol extraction system per batch. During a standard 10-20 minute batch cycle, all of the active cannabinoids will be extracted in a solution of ethanol of approximately 40-50 liters per run.
- Once extracted, the final solution will be chilled for a minimum of 12-24 hours to allow waxes to separate for removal.
- 12” vacuum-assisted tabletop Buchner filtration systems will be used for rapid wax recovery during winterization. 25-micron filter papers will be initially used for rough removal of waxes.
- The partially winterized solution will be returned to the cryogenic freezer for 12-24 additional hours before being filtered by the tabletop Buchner funnels with 3-micron papers to remove fine grain lipids.
- Stainless steel falling film (FFE) ethanol recovery systems will assist in bulk solvent recovery post-winterization. 90-95% of ethanol recovery will occur using in this system.
- 50-liter rotary evaporators will take the output of the FFE systems and provide the final 5-10% of ethanol recovery prior to distillation.
- The purified crude extract will be transferred to heated jacketed reactors with overhead stirrers for decarboxylation which will convert the non-psychoactive THCa to Delta 9 THC. This process will aid in the efficiency of distillation and stabilizing the reaction of separating fractions.
- Large volume (20 and 10 liter) short path distillation systems will be loaded with the decarboxylated crude and will fractionally distill out unwanted components (terpenes, contaminants) to produce finished distillate product. Two successive distillation will be used to further refine the product before end customer consumption and reduce the chance of any residual solvents.
- The high purity extract that will be poured out from receiving flask will undergo inspection, sorting for quality control, and sampling for analytical testing, packaging into .5 gram and 1-gram containers and vaporizer products. These products will be labelled with quantity, strain information, ingredients, and any other required information for retail and wholesale.

- A written batch production record will be created, cross-checked, and entered into the compliance tracking software.
- Post extracted material will be disposed of in accordance with all local and state direction.
- Extraction material consisting of small flowers, and trimmings produced by cultivation will be stored in a secured locker on site in approximate quantities of 500 to 3000 lbs / week.
- No volatile solvents, heavy equipment, or hazardous materials will be used in this process.
- Proper training, care, and safety protocols will be in place to protect operators.

Extraction Methods

Centrifuge-based ethanol extraction machines will be used for the primary, solvent extraction techniques. Other types of processing in the facility will include but not limited to:

- Sift/Kief Collection
- Rosin Press

Ethanol Extraction

The working principle for the ethanol extraction is that the application of highly cooled ethanol, with determined soak/residence time on the plant material, will transfer desired cannabinoids to the ethanol solution for further purification and processing. Centrifuge motion will help with initial separation of ethanol/cannabinoid solution from plant material. Post-process, all ethanol will be removed from the extract in a manner to recapture the solvent and ensure that it is not vented into the atmosphere.

Dry Sift/Kief Extraction

The working principle for the dry sift/kief collection is that, through rapid agitation and cooling of plant material in a screened drum, high purity dry sift is separated from plant material beneath a 75 – 200-micron screen.

Rosin Press Extraction

The working principle behind the Rosin Press is to extract pure essential oil compounds from plant material and dry sift by applying heat (45-70 degrees Celsius) and pressure (500-2000 lbs.) to the plant material and dry sift.

Post-Extraction Purification Methods

Post-extraction purification will begin with introducing the cannabinoid-rich ethanol solution to cryogenic temperatures in order to allow waxes to precipitate from the solution. Progressively finer grades of micron filter paper will remove waxes to purify the solution even further. Falling film and rotary evaporator technology will separate the ethanol from the highly refined crude product. Once separated, the crude will be decarboxylated under heat and manual agitation before it is fractionally distilled. Fractional distillation will refine the product to achieve 85%+ delta-9-THC potency with desired total cannabinoids in 90%+ range. Parts per million for one (1) gram of finished extract produced in the Company's cannabis manufacturing facility will not exceed five hundred (500) parts per million of residual solvent or gas when quality assurance tested.

Manufacturing Equipment List

The items listed below are examples of the types of equipment that will be utilized in the manufacturing process. The list of exact equipment installed will be provided to the building official prior to the time the Certificate of Occupancy is issued to the facility and this list will be supplemented at that time.

#	Description	Manufacturer, Model	Size (Rounded up)	Electrical Power Requirement	No. of Units Needed
1	Cryo Freezer	Revco Ultima II	45" x 35" x 76"	240V, 10 Amps	
2	Edwards Vacuum Pump	E2M30	23" x 7" x 11"	240V, 5 amps	
3	Huber -90 +200 Unistat Chiller	Huber Unistat 405	17" x 12" x 25"	240v, 18.5 amps	
4	Water Heater/ Recirculator	Polyscience MX Immersion Circulator	5" x 3.8"x 14.1" in	120v, 10 amps	
5	Ethanol Crude Extractor System	Delta Separations CUP15	25" x 37"	240v, 30 amps	
6	Large Scale to Weigh Solvent Tanks	DigiWeigh DWP440	29" x 14" x 6.5"	Battery Operated	
7	Rotary Evaporator 50 Litre	Ai SolventVap 50L	46" x 28" x 58"	220v, , 29 amps	
8	Diaphragm Pump 6.1 cfm	Welch 6.1 cfm Full Chemical-Resistant 8-Head	21" x10" x12"	110v, 5.9 amps	

		Diaphragm Pump			
9	PolyScience Chiller 1.5 HP	Polyscience DuraChill 1.5HP Chiller	30.5" x 19" x 26"	240v, 23.1 amps	
10	20 Liter Mantle	OSS 20L	52" x 24" x 16"	240v, 10.4 amps	
11	10 Liter Mantle	DigiM10	52" x 17.5" x 13"	220v, 12 amps	
12	Vacuum Ovens	AI 220 3.2	30.5" x 24" x 29"	220v, 6.8 amps	
13	Hot Plate	Waverly HS2-S	10.2" x 6" x 3.2"	110v, 4.68 amps	
14	Overhead Stirrer	R100c	12" x 12" (estimated)	110v, 2.72 amps	
15	Separatory Funnel	5L	12" x 12"	N/A	
16	Buchner Funnel	12"	18" x 18" (estimated)	N/A	
17	Air Compressor	Husky 60 gallon	29" x 33" x 72"	240v, 15 amps	
18	FFE Ethanol Recovery	Vap15	36" x 96" x 114"		

Quality Control

The Company will implement controls and procedures in accord with 930 CMR 500.105 to ensure that each batch meets the specifications identified by the Massachusetts Cannabis Control Commission. The Standard Operating Procedures will identify points, steps, and stages in the process where critical control is necessary to ensure the quality and consistency of all final products, and how those controls will be followed and documented. Quality assurance priorities will include the following:

- The selection, weighing, and measuring of raw materials and the determination of finished yield are reviewed by a second individual.

- Major equipment, transfer lines, containers and tanks used for processing, holding, or filling are identified to indicate contents, batch identification/designation, stage of processing and control status.
- There are appropriate measures to prevent contamination with microorganisms, chemicals, filth, or other extraneous material.
- There are in-process controls to ensure product uniformity, integrity (for example, in-process batch weights), accurate fill of mixing containers, and adequacy of mixing.
- The theoretical yield for a production batch is compared with the actual yield.
- The storage and handling of packaging materials that are intended to come into direct contact with the product prevent selection errors and microbiological or chemical contamination.
- Water used as an ingredient is tested or monitored regularly to verify that it meets applicable chemical, physical, and microbiological specifications for quality.
- All raw materials and finished products will be stored appropriately, batch tested for quality control, and handled with care utilizing gloves, lab coats/coveralls, hair and beard nets where applicable.
- A batch production record will be created for each individual batch within a formulation and logged into the compliance software.
- Environmentally friendly cleaners will be used to sanitize each piece of equipment and contact area prior to daily operations. Extraction equipment will be maintained and kept in good working order. Stainless steel and nylon screening will be used at the dry sift collection step to act as a separation filter between the plant material and the glandular trichomes that contain the essential oil compounds.
- Measuring devices will be properly calibrated on a regular basis to assure that measurement values are accurate and consistent from batch of cannabis product. Batches will be tested by a third-party facility to ensure that the cannabis products are safe and suitable for human consumption and/or use.
- A log will be kept on premises of required and completed inspections and maintenance. Replaceable parts and consumable items (e.g.: filter bags, parchment paper, labels, etc.) will be kept on hand at all times.

- Potential hazardous risks posed by cannabis concentrate products, including the risk of microbial activity, pesticides residues, and solvent residues, will be identified and prevented for raw materials and finished products through rigorous testing protocols. Parts per million for one (1) gram of finished extract produced in the cannabis manufacturing facility will not exceed five hundred (500) parts per million of residual solvent or gas when quality assurance tested.
- A warning will be contained on the product label of all cannabis concentrate products to encourage consumers to monitor their use THC-containing products and to avoid operation of a motor vehicle and other types of heavy equipment.
- Topical cannabis products will only contain ingredients permitted for cosmetic manufacturing in accordance with regulatory guidelines.

Good Manufacturing Practices

In accordance with 930 CMR 500.105 and 930 CMR 500.130, the Company will establish and implement written procedures to ensure the following for all personnel:

Cleanliness

All individuals working in direct contact with cannabis products, cannabis product-contact surfaces, and cannabis product-packaging materials will conform to hygienic practices to the extent necessary to protect against allergen cross- contact and contamination of cannabis products while on duty. The methods for maintaining cleanliness include:

- Wearing appropriate outerwear to protect against allergen cross-contact and contamination of cannabis products, contact surfaces, and packaging materials.
- Maintaining adequate personal cleanliness.
- Washing hands thoroughly in an adequate hand-washing facility before starting work, after each absence from the workstation, and at any time when hands may have become soiled or contaminated, and sanitizing hands if necessary to protect against contamination with undesirable microorganisms.
- Removing all unsecured jewelry and other objects that might fall into cannabis products, equipment, or containers, and removing hand jewelry that cannot be adequately sanitized during periods in which cannabis products are manipulated by hand. If such hand jewelry cannot be removed, it may be covered by material which can be maintained in an intact, clean, and sanitary condition and which effectively protects against the contamination by these objects of the cannabis products, cannabis product- contact surfaces, or cannabis product-packaging materials.

- Maintaining any gloves, if they are used in cannabis product handling in an intact, clean, and sanitary condition.
- Wearing hair nets, headbands, caps, beard covers, or other hair restraints in an effective manner, where appropriate.
- Storing clothing or other personal belongings in areas separate from those where cannabis products are exposed or where equipment or utensils are washed.
- Confining the following activities to areas separate from those where cannabis products may be exposed or where equipment or utensils are washed: eating food, chewing gum, drinking beverages, and/or using tobacco.
- Taking any other necessary precautions to protect against allergen cross-contact and against contamination of cannabis products, cannabis product-contact surfaces, or cannabis product-packaging materials by microorganisms or foreign substances (including perspiration, hair, cosmetics, tobacco, chemicals, and medicines applied to the skin).

Sanitary Operations

In accordance with 930 CMR 500.105 and 930 CMR 500.130, as well as in compliance with the sanitation requirements in 105 CMR 590.000: *State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements* the Company will establish and implement written sanitary operation procedures to ensure the following:

- The premises, including any buildings, fixtures, and other physical facilities therein on the premises are maintained in a clean and sanitary condition and are kept in good repair so as to prevent cannabis products from becoming adulterated.
- The cleaning and sanitation of utensils and equipment is conducted in a manner that protects against allergen cross-contact and contamination of cannabis products or product components, cannabis product-contact surfaces, or cannabis product-packaging materials.
- Cleaning compounds and sanitizing agents used in cleaning and sanitizing procedures are free from undesirable microorganisms and are safe and adequate under their conditions of use. Only the following types of toxic materials shall be used or stored on the premises where cannabis products are processed or exposed:
 - Those required to maintain clean and sanitary conditions
 - Those necessary for facility premises and equipment maintenance and operation
 - Those necessary for use in the cannabis manufacturing facility's premises operations

- Toxic cleaning compounds, sanitizing agents, and pesticide chemicals are identified, held, and stored in a manner that protects against contamination of product components, cannabis products, cannabis product-contact surfaces, or cannabis product-packaging materials.
- Measures are taken to exclude pests from the cannabis manufacturing facility premises in all areas where cannabis components and/or products may be at risk of contamination by pests. The use of pesticides to control pests in the cannabis manufacturing facility premises is permitted only under precautions and restrictions that protect against the contamination of cannabis products, cannabis product-contact surfaces, and cannabis product-packaging materials.
- All cannabis product-contact surfaces including utensils and equipment are cleaned as frequently as necessary to protect against allergen cross-contact and contamination of cannabis products.
- Cannabis product-contact surfaces used for manufacturing, processing, packing, or holding low-moisture cannabis products shall be maintained in a clean, dry, and sanitary condition before use. When such surfaces are wet-cleaned, they shall, when necessary, be sanitized and thoroughly dried before subsequent use.
- When cleaning is necessary to protect against allergen cross-contact or the introduction of microorganisms into cannabis products during processing methods that utilize water (wet processing), all cannabis product-contact surfaces shall be cleaned and sanitized before use and after any interruption during which cannabis product-contact surfaces may have become contaminated. Where equipment and utensils are used in a continuous production operation, their surfaces shall be cleaned and sanitized, as necessary.
- Single-service articles (such as utensils intended for one-time use, paper cups, and paper towels) are stored, handled, and disposed of in a manner that protects against allergen cross-contact and contamination of cannabis product, cannabis product-contact surfaces, or cannabis product-packaging materials.
- The non-cannabis product-contact surfaces of equipment used in the cannabis manufacturing facility premises are cleaned in a manner and as frequently as necessary to protect against allergen cross-contact and contamination of cannabis products, cannabis product-contact surfaces, and cannabis product-packaging materials.
- Cleaned and sanitized portable equipment with cannabis product-contact surfaces and utensils are stored in a location and manner that protects cannabis product-contact surfaces from allergen cross-contact and contamination.

Sanitary Facilities and Controls

In accordance with 930 CMR 500.105 and 930 CMR 500.130, as well as in compliance with the sanitation requirements in 105 CMR 590.000: *State Sanitary Code Chapter X: Minimum Sanitation Standards for Food Establishments*, and with the requirements for food handlers

specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*, the Company's manufacturing premises will be equipped with adequate sanitary accommodations as follows:

- **Water Supply.** The water supply will be adequate for the operations intended and derived from an adequate source. Any water that contacts cannabis products, cannabis product-contact surfaces, or cannabis product-packaging materials will be safe and of adequate sanitary quality. Running water will be provided in all areas where required for the processing of cannabis products, for the cleaning of equipment, utensils, and cannabis product-packaging materials, and/or for employee sanitary facilities.
- **Plumbing.** Plumbing systems will be of adequate size and design and will be adequately installed and maintained in order to:
 - Carry adequate quantities of water to required locations throughout the manufacturing facility premises.
 - Properly convey sewage and liquid disposable waste from the facility premises.
 - Avoid the creation of unsanitary conditions and contamination to cannabis products, water supplies, equipment, or utensils.
 - Provide adequate floor drainage in all areas where floors are subject to flooding- type cleaning or where normal operations release or discharge water or other liquid waste on the floor.
 - Provide that there is not backflow from, or cross-connection between, piping systems that discharge wastewater or sewage, and piping systems that carry water for cannabis products or cannabis product manufacturing.
- **Sewage Disposal.** Sewage will be disposed of into an adequate sewerage system or through other adequate means.
- **Toilet Facilities.** The Company will provide employees with access to adequate, readily accessible toilet facilities on premises. Toilet facilities will be kept clean and will not pose a potential source of contamination of cannabis products, cannabis product-contact surfaces, or cannabis product-packaging materials.
- **Hand and Eye Washing Facilities.** The Company will provide hand and eye washing facilities on premises designed to ensure that an employee's hands do not pose a source of contamination to cannabis products and that any unwanted eye exposure to irritants can be immediately treated. Washing facilities will be conveniently located and furnish running water of up to [100° F (30° C)].
- **Waste Disposal.** Waste will be conveyed, stored, and disposed of so as to minimize the development of odor, minimize the potential that waste will attract, harbor, or otherwise

contribute to the breeding of pests, and protect against the contamination of cannabis products, cannabis product-contact surfaces, cannabis product-packaging materials, water supplies, and ground surfaces.

Packaging & Labeling

Pursuant to 935 CMR 500.105 and 935 CMR 500.140, the Company will follow the following procedures with regard packaging and labeling cannabis products:

-
- The Company may package, re-package, label, and re-label cannabis for retail sale.
 - The Company will not package, re-package, label, or re-label manufactured cannabis products except when the Company also holds a manufacturing license and is packaging, re-packaging, labeling, or re-labeling its own manufactured cannabis products.

The Company will regularly review the Massachusetts state regulations to ensure all cannabis products are packaged in accordance with the rules set forth by the Massachusetts Cannabis Control Commission. The Company will comply with these rules and use the following standards for packaging:

- Products are not allowed to be attractive to children or easily confused with candy/foods that do not contain cannabis.
- Packages are required to be tamper-evident, child-resistant, re-sealable, and labeled.
- Every cannabis product must be traced by assigning unique ID numbers for identification and tracking.

Each cannabis product must be labeled with the following:

- Date of manufacturing and packaging
- Known allergens (nuts, etc.)
- Source and date of cultivation
- Type of cannabis or cannabis product
- Number of servings per package
- Pharmacologically active ingredients (THC, CBD, etc.) and amount (mg per serving)
- "FOR MEDICAL USE ONLY" (for medicinal cannabis)
- Universal symbol for cannabis

- Government Warning: "GOVERNMENT WARNING: THIS PRODUCT CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS PRODUCTS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. THE INTOXICATING EFFECTS OF CANNABIS PRODUCTS MAY BE DELAYED UP TO TWO HOURS. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS PRODUCTS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION." (in bold print).

Packaging and Labeling Records

The Company shall prepare a packaging and/or labeling batch record for each packaging or labeling order assigned and completed. Packaging and/or labeling batch records will contain:

- Title and number of the appropriate packaging and/or labeling SOP
- Identity of the cannabis or cannabis-infused product
- Batch number of the cannabis or cannabis-infused product
- Packaging and/or labeling batch size
- Batch number and identity of each item used during packaging and labeling
- Quantity of each packaging and/or labeling item
- Date(s) on which and, where applicable, the time(s) at which each step of the labeling and/or packaging protocol was performed
- Identity of mechanical equipment used in packaging and/or labeling the batch
- Statement of the actual yield and a statement regarding whether the actual yield is within the acceptable range of the theoretical yield at the end of packaging and/or labeling
- Records of any labeling scrap or cannabis waste generated during packaging and/or labeling of the batch
- Identity of each person performing each process step in packaging and/or labeling of the batch

Packaging and/or labeling batch records shall be maintained for a minimum of seven (7) years from the expiration date assigned to the batch of cannabis packaged or labeled.

Appendix 1 - Additional Resources

Process Validation: General Principles and Practices

<https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM070336.pdf>

Quality System Approach to Pharmaceutical Current Good Manufacturing Practice Regulations

<https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM070337.pdf>

Draft Guidance for Industry: Cosmetic Good Manufacturing Practices

<https://www.fda.gov/Cosmetics/GuidanceRegulation/GuidanceDocuments/ucm353046.htm>

Cannabis/Hemp Extraction Equipment - DIR

<https://www.dir.ca.gov/dosh/pressure-vessels/documents/LPG-CO2-Extraction-Equipment.pdf>

Cultivation Operating Plan

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Introduction

The Company will implement policies and procedures that meet or exceed all requirements to ensure the secure, safe sustainable and proper cultivation of cannabis, as outlined by the Massachusetts Cannabis Control Commission. The Company will establish and maintain policies and procedures as outlined in this Operations Plan, demonstrating the Company's extensive experience in agricultural production.

Roles and Responsibilities

Individual job descriptions have been developed for each position in the Company's organization. The purpose is to ensure that all personnel are clear about their role and responsibilities and to understand how their position contributes to the safe, efficient operation of the center.

Facilities Manager

The Facilities Manager (FM) reports to the COO and is responsible for building maintenance, environmental controls, operations and safety, janitorial services, sanitation, storage and maintenance of chemicals, and non-cannabis/cannabis waste management.

Responsibilities include, but are not limited to:

- Maintaining lighting, HVAC and mechanical systems in excellent working condition.
- Coordinating with the Security Manager to maintain the function and safety of the facility's hardware and infrastructure.
- Managing a budget associated with facilities functions.
- Hiring, managing, and training facilities staff.
- Creating and implementing task-specific SOPs and carry out job risk analyses with the assistance of the Quality Assurance Officer.
- Being aware of federal, state, and local regulations related to cannabis/cannabis business premises requirements.
- Being familiar with local building code and permit regulations.
- Developing a maintenance and inspection schedule for all building and infrastructure systems.
- Conducting or overseeing the routine maintenance and inspection of environmental and other major systems critical to the operation of the organization.

- Developing and maintaining logs and checklists to simplify maintenance and inspection activities.
- Scheduling and facilitating required inspections by outside organizations.
- Determining which types of work can be handled by company personnel and under what circumstances an outside contractor must be called in.
- Serving as the lead responder to critical equipment malfunctions, including the maintenance of a list of critical equipment and phone numbers to call in case of breakdowns.
- Maintaining an on-site inventory of selected equipment parts to facilitate rapid repairs in the event of a malfunction.
- Working with the Security Manager to support the maintenance of security systems.
- Managing chemicals, non-cannabis/cannabis waste, and other refuse.
- Training facilities employees in the proper procedures for handling and disposing of chemicals, including the [Globally Harmonized System](#) of Classification and Labeling of Chemicals (GHS) and the use of Safety Data Sheets (SDSs).
- Keeping records of training for each training module related to chemicals and non-cannabis waste management for every facilities employee, including the date training occurred, type of training, the signature of the employee upon completion of training, the signature of an authorized person who can verify completion of training, and the date retraining is due.
- Forwarding all records and logs to the Record Keeping Manager.
- Becoming familiar with all company Standard Operating Procedures to identify areas in which the Facilities Department may support other business activities.

Facilities Staff

The Facilities Staff report to the Facilities Manager and are responsible for carrying out a subset of scheduled tasks related to maintaining the premises as directed by the Manager.

Responsibilities may include, but are not limited to:

- Replacing equipment that fails or must be changed out on a regular basis, such as light bulbs, filters, etc.
- Carrying out inspections and sanitation tasks according to equipment- or location-specific procedures.
- Maintaining the cleanliness of restrooms, emptying waste containers, and carrying out other general janitorial duties.

- Keeping indoor and outdoor areas clean and orderly.
- Reporting malfunctions, safety concerns, and other issues to the Facilities Manager.
- Maintaining logs and checklists and forwarding completed documents as directed.
- Participating in all required training according to company policy.
- Following safety procedures related to the use of chemicals or other potentially hazardous materials.

Cultivation Manager

Reports to the Director of Production and manages a team of cultivation staff members in the production of high-quality cannabis/cannabis plants and plant materials.

Responsibilities include, but are not limited to:

- Managing a team that handles all aspects of daily cultivation activities in an indoor grow facility.
- Outlining specific roles and responsibilities for plant technicians and work with management to build a team.
- Creating and implementing task-specific SOPs and carrying out job risk analyses with the assistance of the Quality Assurance Officer.
- Providing weekly reports to the Director of Production and make suggestions for improving cultivation systems.
- Maintaining indoor plant growing protocols, developing and testing nutrient regimens, and striving to improve planting techniques and yields.
- Observing the overall health of live plants and executing the pest management program including elimination of all types of mold, powdery mildew, spider mites, root aphids, fungus gnats, etc.
- Working with the Inventory Control Manager to perform all cultivation tracking with the inventory control system in compliance with rules and regulations.
- Managing plant scheduling to accurately project all growing requirements on a daily, weekly, and monthly basis to maximize high-quality yield and provide a steady and consistent supply of product.
- Scheduling, managing, and overseeing cloning processes, achieving a minimum 90% success rate.

- Managing the maintenance of irrigation, climate control systems, cleaning, sanitation, hazard action plans and alert management if there are issues.
- Inspecting the facility to identify systems, building components or equipment that may need repairs or adjustments.
- Training employees in task-related processes, problem solving and health and safety issues.
- Participating in manager training and fostering a spirit of cooperation, respect and professionalism among employees and other managers.
- Ensuring that logs and other records are forwarded to the Record Keeping Manager.
- Working closely with the Quality Assurance Officer on quality control and regulatory issues and on monitoring and improving the implementation of standard operating procedures.
- Collaborating with the Security Manager to ensure the security of the growing area, resulting products and cultivation records.
- Being prepared to meet with state and local regulatory officials to facilitate inspections and audits.
- Maintaining records such that requests for information from regulating authorities or law enforcement can be met by required deadlines.

Cultivation Staff

Reports to the Cultivation Manager (CM) and participates in the production of high quality cannabis/cannabis plants and plant materials by adhering to procedures and proactively reporting potential issues.

Responsibilities include, but are not limited to:

- Participating in all training related to cultivation, safety, inventory control, regulations, etc.
- Promoting all safety and housekeeping activities to ensure a healthy work environment.
- Assisting the CM in all aspects associated with indoor cannabis cultivation, such as plant propagation, watering, feeding, pruning and transplanting, according to task-specific procedures.
- Observing and examining vegetative and bloom development according to the inspection checklist and report irregularities.

- Watering and fertilizing according to the nutrient schedule and report any issues with the irrigation system.
- Identifying any pests, diseases, or infestations; maintaining related logs and report problems to the CM.
- Identifying and reporting mechanical systems malfunctions.
- Recording environmental conditions such as temperature, humidity, and any other pertinent information as requested by the CM.
- Maintaining careful records of all activities and forward paperwork as directed.
- Making suggestions to the CM related to improving safety conditions or increasing efficiency.

Processing Manager

Reports to the Director of Production and participates in the production of high-quality harvested product. Applies knowledge of managing, processing, and maintaining the integrity post-harvest flower material.

Responsibilities include, but are not limited to:

- Managing a team that handles all aspects of daily processing activities in an indoor grow facility.
- Outlining specific roles and responsibilities for processing technicians and working with management to build a team.
- Creating and implementing task-specific SOPs and carrying out job risk analyses with the assistance of the Quality Assurance Officer.
- Providing weekly reports to the Director of Production and making suggestions for improving cultivation systems.
- Participating in all training related to processing, safety, inventory control, regulations, etc.
- Managing the Processing Staff in relation to the harvesting and processing of all post-vegetative material.
- Participating in manager training and fostering a spirit of cooperation, respect and professionalism among employees and other managers.
- Training employees in task-related processes, problem solving, and health and safety issues.

- Working with the Inventory Control Manager to perform all tracking with the inventory control system in compliance with rules and regulations.
- Identifying which flower material will be hand or machine trimmed.
- Identifying which material will be sent to extraction.
- Managing quality control and consistency of batches.
- Inspecting the facility to identify systems, building components, or equipment that may need repairs or adjustments.
- Ensuring that logs and other records are forwarded to the Record Keeping Manager.
- Working closely with the Quality Assurance Officer on quality control and regulatory issues and on monitoring and improving the implementation of standard operating procedures.
- Collaborating with the Security Manager to ensure the security of the processing area, resulting products and processing records.
- Being prepared to meet with state and local regulatory officials to facilitate inspections and audits.
- Maintaining records such that requests for information from regulating authorities or law enforcement can be met by required deadlines.
- Performing additional tasks as may be required by the Director of Production.

Processing Staff

Reports to the Processing Manager (PM) and participates in the production of high-quality harvested products by adhering to procedures and proactively reporting potential issues.

Responsibilities include, but are not limited to:

- Participating in all training related to processing, safety, inventory control, regulations, etc.
- Promoting all safety and housekeeping activities to ensure a healthy work environment.
- Assisting the Processing Manager in maintaining a regular trimming and processing schedule.
- Trimming and separating flower material, based on batch names and quality levels.
- Identifying and reporting quality problems during the trimming and processing stages.

- Maintaining cleanliness and sanitation of all trimming and processing areas.
- Recording environmental conditions such as temperature, humidity, and any other pertinent information, for the trimming/processing area.
- Identifying and reporting mechanical systems malfunctions.
- Maintaining careful records of all activities and forwarding paperwork as directed.
- Making suggestions to the PM related to improving safety conditions or increasing efficiency.

Facility Description/Layout

The Company will construct and maintain the facility area and cultivation environment according to the specifications outlined below, meeting or exceeding all requirements outlined in 930 CMR 500.105 for the secure, safe, sustainable, and proper cultivation of cannabis.

Facility Design

The facility provides adequate space for safe and ergonomically accessible cannabis propagation and cultivation. A substantial amount of buildable space for the planned facility design has been carefully divided between distinct processes. The independent, secure-process areas within the facility include cultivation, trimming, drying, manufacturing, and storage, each with separate, locked security mechanisms and access codes providing for restricted access to each area. The sum of each of these independent units comprises the production system, employing cleanroom standards throughout.

The Company will establish and maintain, with the highest standards of design and management, a high-efficiency commercial grade medical cannabis cultivation facility, with industry-standard and state of Massachusetts required systems for managing irrigation, lighting, temperature, humidity, ventilation and all other critical infrastructure necessary for high quality cannabis production.

The Company's facility is steel frame concrete construction, with rooms devised using load-bearing insulated paneling. The cultivation and processing rooms are built to wet room standards, which allow for reduced microbial load and ease of cleaning. Mobile racking systems and LED lights occupy 75% of the space in each cultivation room. Designed for easy installation, these racking systems can be stationary or mobile and can be used with expanded metal-grate surfaces, ebb, and flood trays, and/or irrigation troughs. The remaining space in each room is allocated for aisle ways, ADA access, and work surfaces.

The facility is outfitted with state-of-the-art and Massachusetts State Building Code environmental controls, including an integrated air conditioning and dehumidification system, redundant air handlers, back-up power and intensive air circulation.

The Company will use coco coir as the growing medium and a customized mineral nutrient formula for each stage of growth. Coco coir is made of the fiber of coconut husks, is environmentally friendly, inexpensive, and buffers nutrient availability in a way that improves flower yields and quality.

The Company will also use a trellis support system that is easy to install and height adjustable. The trellis system will support maturing plants through top heavy growth, minimizing the risk of flower damage and maximizing the canopy space. The system includes vertical tube supports that allow height adjustment to accommodate crops of various cultivars, and netting that is attached by stretching over the tube support or secured using ties.

The facility will contain one room for seeds and clones (the “Nursery”), one room for mother plants (genetic stock), one room for vegetative growth, nine flowering rooms, and one room for each additional function.

Key Facility Areas

- **Administration & Employee Area:** The administration and employee areas will house offices, shipping and receiving, product vault, change rooms and showers, main entry and sign-in area to facility, security office, secure storage, staff amenities, and lunch room.
- **Nursery:** The Nursery houses seed germination and cutting or “clone” propagation. Humidity and temperature will be carefully maintained within narrow ranges, as plants are most fragile in the clone stage; clones require higher volumes of humidity and heat than plants in subsequent stages of growth. The Nursery utilizes 4-tier racks with propagation trays and humidity domes. The equipment will include a high-end environmental controls system, energy-efficient low-wattage LED lights, thermostatically controlled heat mats and air quality monitors. The Nursery room square footage will be determined by as built plans and will be kept at 75°F and 60% relative humidity.
- **Vegetation (“Veg”) Room:** This is where the plants undergo their initial [number] weeks of growth. Like the Nursery Room, the Veg Room contains its own set of environmental controls, including lights, HEPA filters, dehumidifiers, air circulation fans, air intake fans, and CO2 supplementation. Carbon filters will be used for odor control. The vegetation room will occupy [to be determined] square feet.
- **Mother/Genetics Room:** The Mother/Genetics Room is governed by an independent set of environmental systems including lights, HEPA filters, dehumidifiers, air circulation fans, air intake and outtake fans with carbon filters, and a CO2 generator. The space allocated provides sufficient spacing between plants such that each plant will be exposed to adequate air circulation and light to provide more than the minimum quantity of necessary clones for supplying the facility with fresh propagation/clone stock each week. The Mother Room will occupy [to be determined] square feet of space in the facility.

- **Flower Rooms:** The Flower Rooms occupy the bulk of the total cultivation area, occupying about 80% of the total canopy space at the site. Each room has its own redundant and backed up climate-control system, air circulation fans, fresh air intake and outtake fans, air scrubbers, LED lights, Co2 supplementation, monitoring equipment, and emergency lighting. One of the [to be determined] rooms will be harvested each week in its entirety, to allow for thorough cleaning before being repopulated for the next flowering cycle. Each flowering room will be [to be determined] square feet in size, with 75% of each room being plant canopy space.
- **Trimming Room:** The Trimming Room is where the flower material is immediately taken after being harvested from the Flower Rooms. This room has similar environmental controls and standards to the plant cultivation rooms however they must be kept colder and cleaner in order to maintain the delicate condition of recently cut flower material. It contains trimming areas, tables, and chairs for Processing Staff and has sufficient space for harvest carts to roll in and out as material is processed throughout the day.
- **Drying Room:** The Drying Room is where all recently harvested flower material stays while it is awaiting trimming and storage. The room has an open floor plan and sufficient space for harvest carts to stay for 2 weeks' worth of harvested material. Air in this room is kept cool, dry, scrubbed, fresh, and heavily circulated to avoid the settling and growth of any mold or bacterial spores on the flowers. Carts are moved in as plants are harvested from flowering rooms, moved out as they are processed, and moved back in as they are awaiting storage or further processing steps.
- **Storage Area/Vault:** The storage will contain dry storage space, a refrigerator and freezer storage, plus stainless steel work benches and air quality monitors and scrubbers. Additionally, a heavily secured and climate-controlled vault will be near the executive offices where pre- and post-lab tested finished products will be kept prior to transport to distribution or retail outlets.

Cultivation Equipment

The following is a summary of the equipment to be used in the cultivation areas:

- **Inline fans:** These fans provide a constant stream of air coming into the cultivation area and then removing it. Several are in use to provide regeneration of the air on an hourly basis.
- **Carbon filters:** These are used in conjunction with inline fans. This equipment scrubs all air as it moves through or out of the facility and removes odors and contaminants from the air during that process. Carbon filters have been an industry standard for cannabis odor control for over 20 years due to their reliable performance.

- **Circulating fans:** These provide air circulation inside all areas of plant growth. While inline fans move air between rooms [(and to the outside of the building in the case of open systems)], circulation must take place inside each area to keep plants moving, temperatures constant, and prevent mold and insects from settling on leaf surfaces.
- **Cloning trays & medium:** These are plastic propagation trays that hold rooting media for clones and seedlings to sprout and grow. The cloning medium will either be coco plugs or rockwool slabs.
- **CO2 tanks:** CO2 will be supplemented in the plant areas through a tank dispersal system, attached to a controller/monitor, that maintains 1000ppm of CO2 in the plant environment during the “daytime” periods of plant growth. This improves plant metabolism and supplements CO2 deficiencies that can occur in closed-system environments.
- **EC/PPM meters:** These are used in the reservoir process to track the electroconductivity (EC) of nutrients in water and measure EC in root zone during each stage of growth. Each nutrient will add more EC to the total readable levels, and these levels must be maintained within a certain range of concentration, or plants will become under- or over-fertilized.
- **PH meters:** These are special meters that read the pH (acidity or alkalinity) of the water and soil. They can be integrated into the EC meters, or can be separate. Plants require specific ranges of pH to grow properly and daily checks are performed on input water as well as runoff.
- **Dehumidifiers:** These are necessary to offset the large quantities of moisture that plants transpire as they grow. Units are placed in the nursery, vegetative and flowering areas, and set to maintain moisture levels for the sake of maintaining flower quality and consistency and minimizing microbial growth on flower and work surfaces.
- **Water filtration:** The Company will use a multi-stage water filtration system to remove all sediments, heavy metals, chlorine, and chloramines from the water to ensure plant health and safety. All incoming and recirculated water will be treated with ozone and UV light to sterilize it and to avert the spread of pathogens through the irrigation system.
- **Water Reservoirs:** These are large water holding tanks that have been sanitized and injected with nutrients to achieve an appropriate balance of pH and EC for the needs of the plants in each stage of growth.

- **Irrigation pumps and tubing:** These are used to delivery irrigation water to the plants based on the moisture levels of the plants in each room, or on a timed schedule. The pumps will bring water from the water storage tanks into the plant rooms and the tubing will branch off to each plant, serving consistent amounts of water and nutrients to the plant media.
- **Plant Lights:** Different lighting fixtures are used for different stages of plant growth. LED strip lights will be used for mother plants, with 300 watts per 16 sq. ft. plant area. Cloning will use 2 20-watt LED strip lights per 8 sq. ft. of clone space. Higher wattage LED lights will be used for vegetative and flowering areas, with 375 watts of light over each 16 sq. ft. vegetative area and 660 watts of LED used of each 16 sq. ft. of flowering space.
- **Light control panels & timers:** These are used to control specific times for light and irrigation pumps to turn on. The process is automated so that employees do not have to be on site 24 hours a day, allowing the facility to operate more efficiently.

Plant containers: The Company will use 4x8 ft grow trays in the mobile racking system. Each grow tray will contain 32 2-gallon fabric pots in the vegetative stage of growth and 18 5-gallon pots in the flowering stage.

- **Sulfur burners:** These are simple machines that hang from the ceiling in clone, Veg and Mother plant rooms that burn and release organic sulfur into the air on a timed daily basis to prevent powdery mildew and other microbial pathogens.

Environmental Controls

The Company, in accordance with the settings required to produce high quality cannabis, will install and maintain an integrated environmental control system to manage temperature, humidity, air exchange, CO2 levels, and air quality, independently in plant cultivation and processing areas.

In addition to these environmental control systems, the facility will be equipped with analog measuring and controlling equipment in the event of a control system failure.

Cultivation staff, as part of the daily inspection process, are required to monitor and record the temperatures and humidity levels as displayed on the electronic environmental controllers and the analog measuring system. Settings will be notated twice a day in each area, with weekly evaluations of logged data by a Manager. The Director of Production is responsible for making sure all managers and appropriate staff members have been trained on these procedures.

Daily, cultivation staff are required to monitor and check airflow around the plants. They are instructed to look, listen, and feel for air circulation in and around the canopy. The Cultivation Manager is responsible for making sure that all appropriate staff have been trained on this procedure.

The Company will maintain cleaning and equipment maintenance logs on a daily basis for the environmental controls. At a minimum, the equipment cleaning and maintenance log will include the following information: date, time, piece of equipment, when it was checked, when it was cleaned, sanitizer use, the staff member performing the services, and a supervisor's signature.

The environmental control system will include lighting controls, programmed by the Cultivation Manager. Cultivation personnel are required to monitor and inspect the lighting on a regular basis to ensure proper functioning. Inspection of lighting will be recorded in the Cultivation Manager's log book and software system. The log will be scanned into the Company's proposed inventory control system, and password protected for limited access. The physical log will be kept on location for a minimum of five years. The Director of Production is responsible for making sure that all appropriate staff have been trained on these procedures.

Environmental Monitoring

Environmental conditions in plant cultivation, processing and storage areas will be electronically monitored and controlled 24 hours per day in each facility area. Networked monitoring equipment will alert managers when the automated systems fail to maintain programmed settings. Automated controllers will sound auditory alarms in the facility should pre-set parameters be breached.

Designated managers will be automatically notified via text message or email if there is a system failure or environmental targets are not maintained, including temperature, humidity, light levels, CO₂ and any other gases used. If there is a failure in maintaining the automatic climate control settings, the preferred parameters will be re-established and maintained through manually controlled portable dehumidifiers, heaters and air conditioning units.

Should the environmental controls fail during work hours, staff members on site will immediately inform a supervisor who either correct the problem or report it to the Facilities Manager.

The Facilities Manager will replace any and all defective units or equipment with backups held on site.

Once environmental parameters are restored, all events, communications (automatic or otherwise) and actions taken will be electronically scanned and stored in the computer system to document the event.

Cultivation Overview

This Cultivation Operating Plan outlines the techniques, methods, and standards that the Company will implement to ensure safe, sustainable, and proper cultivation of a steady, uninterrupted supply of cannabis. To maintain professional cultivation standards, careful processes have been established.

The Company looks at the cultivation process not only from seed to harvest, but with a holistic view of the plant's life cycle and what each cultivar requires based on its potential genetic expression.

Description of Each Growth Phase

Cannabis is a photosensitive plant. Vegetative plants require at least 18 hours of light per day and can grow successfully with as much as 24. Flowering plants, on average, need at least 12 hours of *darkness* per day, to stop growing vegetatively and trigger flower formation and maturation. Following is a more detailed description of each phase of growth.

- **Germination Stage:** Germination is a two-part process that starts with the seeds sprouting, and the emerging tap root to take hold in the media. Shelf heaters are used to support the germination process, and lights are mounted above to initiate photosynthesis when the sprouts emerge from the media surface. The germination process requires an average of five days for most cultivars.
- **Seedling Stage:** Once germinated sprouts emerge from the media surface, the sprout is now technically a “plant” (with leaves and at least one root) and is referred to as a “seedling”. The seedling stage lasts 5-6 weeks and requires 18-24 hours per day of light. The first two leaves that emerge are called cotyledons. They are rounded on the edges and do not look like typical cannabis leaves. These seedlings are grown on plant racks until their gender is determined, and until they are 12-18” tall.
- **Flower Testing Stage** (known as “pheno hunting” in the cannabis culture) Once seedlings are sexed, they are flowered to identify the desired genotypes from each chosen cultivar. This process requires 12 hours of day and 12 hours of darkness each 24 hours. The desired genotypes will be cloned to build the Company’s genetic library of Mother Plants.
- **Re-Vegetating Stage** If clones are taken from flowering plants, they must be reverted to a vegetative state of growth and turned into mother plants before they can be reproduced for large-scale flower production. Flowering clones will revert to vegetative growth if the lights-on schedule is increased to 18 or more hours per day of light. The reverted plants will express new vegetative growth within 4-6 weeks.
- **Mother Plant Stage** The mother plant stage is similar to the vegetative stage in terms of light duration, but mother plants are kept for 6 months for the purpose of providing clones to fill the flower rooms with ongoing production stock. They also serve as the genetic repository for the facility. The mother plants need 18-24 hours per day of light and are typically kept at a height of 3-4 feet tall for the duration of their lives.
- **Clone Stage:** Clones are created from bigger plants by cutting a branch from a plant and submerging its stem into rockwool or rooting plugs until new roots emerge. This process takes from 6-12 days. Successful cloning requires carefully controlled environmental conditions in order to get vegetative plants off to a good start. Incubating clones are

covered with humidity domes and kept in warm, moist conditions with 24 hours per day of modest quantities of light.

- **Vegetative Stage:** The vegetative stage refers to the stage that comes after the seedling or cloning stages. In the vegetative stage, the plant increases in physical size, but does not flower. Vegetation requires direct light for 18-24 hours each day, and an increased supply of water and nutrients to promote root, stalk, stem and leaf growth. This stage lasts 2 to 4 weeks, depending on the cultivar, and depending on the desired size of the flowering plants at harvest time. If vegetative plants are shifted into flowering while they are small, they will be smaller as finished flowered plants; if vegetative plants are shifted into flowering when they are big, they will be bigger as finished plants. Most vegetative plants double or triple in size from the time they get triggered into flower production to the time they are harvested.
- **Flowering Stage:** The flowering stage, also sometimes called the “bloom cycle,” is the final stage of growth prior to harvest. The plant is triggered into flowering by changing the lighting schedule to 12 hours of darkness and 12 hours of light per day. After about 2 weeks of the new photoperiod, vegetative growth will slow and flowers will begin to form. The Flowering Stage will last an average of 9 weeks depending on the cultivar. The facility is has nine flowering rooms to create a “perpetual harvest” production method. Each week, one flower room is harvested and cleaned, and is immediately repopulated with plants from the vegetative (“Veg”) room, that will be triggered into the flowering that day.
- **Harvest Stage:** The harvest stage is a three-part process that takes 2-3 weeks. It includes: (1) cutting and drying the plant; (2) trimming excess leaf material from the flowers; and (3) curing and storing the dried flowers to preserve the terpenes and other biochemical plant constituents. Flower material must be handled carefully in this stage to avoid terpene loss and contamination. Drying, curing and storage is done in cool, dry dark conditions to preserve the stability of the plant compounds.

Lighting Layout

The total square footage of lighting will be determined by the Company’s as built plans.

Cultivation Operations Daily Checklist

Daily activities are fully documented to ensure proper nutrient supply, filling of the tanks and reservoirs, plant inspection, and so on. A typical daily schedule for a cultivation team member would be the following, and it is understood that any changes to plants, lights or the environment would take place immediately by the employee and be logged into the logbook.

1. **Air Ventilation Check:** Verify that air intake and outtake are working properly and that overall temperature meets required standards.
2. **Air Circulation Check:** Verification that all circulating fans are operating correctly.
3. **Humidity Check:** Verification that humidity levels in each phase of growth is correct.
4. **Temperature Check:** Verification that temperature for each phase of growth is within acceptable ranges.
5. **Soil/Growing Medium Check:** These are checks with each planter by touch and pH meters to ensure plants are not being overwatered or underwatered and pH is in balance.
6. **pH & PPM Checks in Reservoirs:** These are checked on each shift to ensure the proper pH and PPM levels are within range.
7. **Light Adjustments:** Each light on every plant is checked for height and adjusted to ensure each plant is receiving enough light, not getting harmed by lights and that lights are covering all aspects of the plant equally or as equally as possible. Likewise, all lights are examined for excessive heat on ballasts, timers, plugs, timers and ceilings.
8. **Pest, Disease, and Health Inspection:** Using the naked eye and 60x magnifying glasses, cultivators check top side and under leaves for pests, disease mold, fungi, nutrient deficiencies or excessive nutrients, or any other signs that may cause concern to the cultivator for damage to the plant.
9. **Sanitation and Cleaning:** Cultivators at end of shifts are required to clean and sanitize all tools used, including glasses, containers, measuring cups, stirring sticks, shears, etc. for the next day's use, and to keep proper aseptic conditions in the facility. This also includes daily cleaning and sanitization of the rooms.

Cultivar Choices and Descriptions

The following tables are samples of tables to provide alternative cultivar choices available to the Company. The Company shall supplement the tables when the actual cultivar choices are made.

The Company plans to cultivate the following list of cannabis cultivars, with estimated cannabinoid and terpene profiles.

#1: Cultivar Name

FLOWERING TIME	56 days
YIELD	0.75 grams per watt of HID lighting
INDICA	25%
SATIVA	75%
THC	0.5-1%
CBD	11-19%
CBD/THC RATIO AVERAGE	20:1
TERPENE PROFILE	Myrcene: 1.1%, Humulene .4%, Pinene .15%
EFFECT	Almost no physical/cerebral effect due to extremely low THC levels.
MEDICAL VALUE	Used to treat inflammation, sleep disorders and seizure control in children.
COMMENTS	Cultivar A has a fresh pine scent and cough drop flavor. Cultivar A has one of the highest CBD/THC ratios available at this time. Ideal for patients seeking relief without the psychoactive effects of THC.

#2: Cultivar Name

FLOWERING TIME	56-63 days
YIELD	0.75 grams per Watt of HID lighting
INDICA	50%
SATIVA	50%
THC	3-4%
CBD	12%
CBD/THC RATIO AVERAGE	3:1
TERPENE PROFILE	Myrcene: 1.1%, Humulene .4%, Pinene .15%
EFFECT	Mild physical effect, mild cerebral effect.
MEDICAL VALUE	Seizure control, pain management, nausea control.
COMMENTS	Cultivar B has a deep pine/licorice scent and OG fuel flavor. Cultivar B keeps the positive attributes of the cultivar D with a high CBD content. Cultivar B is an ideal cultivar for patients needing some THC to manage a medical condition but are not accustomed to its psychoactive effects.

#3: Cultivar Name

FLOWERING TIME	56-63 days
YIELD	0.75 grams per Watt of HID lighting
INDICA	50%
SATIVA	50%
THC	7%
CBD	9%
CBD/THC RATIO AVERAGE	1.5:1
TERPENE PROFILE	Myrcene: 1.1%, Humulene .4%, Pinene .15%
EFFECT	Medium strength physical effect, mild cerebral effect
MEDICAL VALUE	Seizure control, pain management, appetite stimulant
COMMENTS	Cultivar C has a deep pine/licorice scent and OG fuel flavor. This THC/CBD ratio allows the patient to increase the dosage of THC to treat symptoms due to the attenuating effect CBD has on the effects of THC..

Production Timeline and Schedule

The Company will institute a continuous-cycle cultivation system, with harvests scheduled on a weekly basis, to ensure a sustainable supply of cannabis to meet anticipated demand. The cyclic harvest model allows for pre-scheduling of most staff duties such as cloning, transplantation, pruning, trellising, and harvesting and trimming.

Crop Rotation Schedule

The Company proposes to implement the following production schedule, and in accordance with the estimated timelines identified for each phase of the process, from the assignment of a plant identifier to the transfer of dried product to the manufacturer, distributor or buyer.

The Company's proposed schedules are based on a weekly timeline. The total size of the flowering operation can be broken down into 9 sections (flower rooms) that correlate to amount of clones cut, required veg space, trimming space, drying space, extraction machinery, storage and staffing.

The following is a sample table for the schedule for ongoing operations to enable a reliable balance between efficient timekeeping, realistic staffing numbers and effective use of the available space:

CLONE 3 WEEKS CUT TO TRANSFER	TRANS FER TO VEG	TRANSFER TO FLOWER	HARVES T DATE	TRIMMIN G/ DRYING END DATE	STORAG E/ TESTIN G END DATE	PACKAGIN G END DATE	TRANSFER DATE
ROOM 1 CUT 2019/07/22 CULTIVAR: BLUE DREAM	8/14	9/1	11/2	11/19	11/26		

Part VIII: Appendices

Appendix 1 - Trim Log

Each trimmer must complete a trim log as seen below for each work session.

DATE: _____ EMPLOYEE NAME: _____

[illegible]

Appendix 2 - Pesticide and Chemical Safety Checklist

√	Items to Check	Comments
	Is there a written hazard communication program? Is it accessible?	
	Are employees trained in the program, safe use, required PPE use and hazards of the chemical that they are exposed to?	
	Can an employee find the SDS for a chemical he/she is using and tell you about the hazards and required PPE?	
	Do all chemical boxes, bottles, bags, tanks, etc. have a label that has the chemical name and appropriate hazard warning?	
	Is the pesticide and chemical list current?	

Appendix 3 - Pesticide Application Log

Pesticide Application Log - Single Instance	Enter Information in EVERY field below
Property Address	
Date/Time of Application	
Location on Property	
Director of Task	
Performer/s of Task	
Person Who Supplied Substance	
Trade Name	
Strength	
Quantity & Concentration	
Summary of Event, Equipment, Device/s, Apparatus Used:	

Appendix 4 - Equipment Maintenance List

Date	Equipment	Interval	Description/Findings	Employee
	HVAC ducting / filter cleaning	monthly	Found leak in Plant Rm#1 on east wall- repaired with tape.	
	Lighting check/repair	weekly		
	Thermometers and Hygrometers	weekly		
	Etc.			

Appendix 5 - Hazardous Chemical List – SDS

Chemical / Trade Name	Active Ingredient	Link to Company SDS Doc

Appendix 6 - Special (Non-Routine) Tasks

Date	Task	Hazards	Employee
	Seal ducting around lights	Burns, bulb breakage	
	Check for and seal cracks in the floors and walls		

Appendix 7 - Nutrient Input Use Record

[illegible]

Appendix 8 - Transport Manifest

1. The name and contact information of the licensee's transportation representative, the premises address and license number of the entity transporting the cannabis items;
2. The name, contact information of the representative, licensed premises address, and license number of the entity receiving the delivery;
3. Product name and quantities (by weight or unit) of each cannabis item contained in each trip, along with the unique ID for every batch or item;
4. The date of transport and approximate time of departure;
5. Arrival date and estimated time of arrival;
6. Delivery vehicle make, model and license plate number; and
7. Name and signature of both the delivery and recipient representatives overseeing the trip.

Sender Section:			
Sending Entity:		Signature of Rep:	
Name of Driver:		Contact #:	
Departure Time/Date:		Arrival Time/Date:	
Delivery vehicle make, model:		License Plate # & Driver's DL #:	
Product Name & Batch ID		Weight/Quantity:	
Recipient Section			
Recipient Entity:		Recipient Address:	
Name of Recipient Rep:		Contact #	
Confirm Accuracy of Sender's info:	(initial)	Signature:	

Quality Assurance Plan

Cultivation

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Introduction

The Company is committed to applying a quality management system to all activities carried out in the course of business. The system is designed to ensure that all products sold are in compliance with regulations, are safe for consumption and free of any undesirable contaminants and provide a beneficial experience for consumers.

Quality Assurance encompasses the documented control of procedures and processes carried out by employees, managers and supervisors who are involved in the cultivation, harvesting, testing, production, packaging, and storage of the product according to repeatable methods. Various documents and systems, including the inventory control system, checklists, logs, chain of custody forms will be used as system controls to prompt employees to adequately monitor the purity and consistency of the product/s.

Management

Quality Assurance Officer/Responsible Person

In order to be effective, the Quality Assurance Officer (QAO) will report to the CEO and be a member of the management team. He or she will be involved in the highest level of decision making related to changes to policies and processes, as well as the introduction of new systems, equipment, and products, such that potential quality issues may be identified prior to the implementation of the activity. The QAO is the primary source of information for the Executive Staff and Members of the Board of Directors on issues related to the product that may have an impact on product quality and business risk. The QAO will remain fully versed on regulatory requirements and be responsible for communicating and enforcing those requirements to the staff.

- The QAO will have at a minimum four years of prior experience in quality assurance in a related industry, such as dietary supplements, food, or pharmaceuticals, with at least one of those years including supervisory responsibilities.
- The QAO will be involved in the vetting and selection of new vendors which will be supplying equipment or other materials that will come into contact with the product, including the product itself, packaging, chemicals, scales, agricultural supplies and equipment, manufacturing equipment, and testing equipment.
- The QAO will be involved in implementing improvements to plans, products, and systems within the company in response to employee, customer, and regulating authority feedback.
- The QAO will conduct regular audits of each department.

- The QAO will regularly meet with each person responsible for implementing standard operating procedures and review each task and process for potential improvements. This may be conducted as part of an audit or informally as needed.
- The QAO will maintain and update the procedures in this document in collaboration with each Manager.
- The QAO will be on the notification list to receive correspondence and notices from the regulatory authority related to changes in regulations.
- The QAO will assist in training employees on issues related to product quality.
- The QAO will implement root cause analysis and corrective and preventive action and risk assessments according to industry standards.
- The QAO will employ knowledge management tools and techniques in resolving organizational challenges.
- When procedures are updated either due to regulatory changes or improvements to systems, the QAO will coordinate with managers to update training materials for employees.
- The QAO will stay current on quality-related issues and trends by means of periodically reviewing industry standards, becoming a member of one or more related organizations, participating in conferences, and/or other means of networking with and learning from other quality assurance experts.
- The QAO will maintain updated paper and digital copies of this plan and related documents in the Company's MTC facility at 120 Nantasket Avenue Hull, Massachusetts. Employees will be notified when a new updated procedure is made available and which sections have been modified.
- The QAO will establish measurement systems for defining and tracking materials and product quality.
- The QAO will oversee all internal and third-party lab testing.
- The QAO will be ultimately responsible for ensuring that no contaminated cannabis is delivered to retailers.

The QAO will be forwarded all records related to the following:

- Standard Operating Procedures - creation and changes
- Materials Testing
- Product loss, theft, or diversion

- Test results on all products analyzed prior to release to a retailer
- Test results from a laboratory showing any out-of-specifications results
- Product storage conditions
- Equipment standards and maintenance
- Worker-safety related violations
- Emergencies
- Chemical spills
- Accidents
- Non-conformance to procedures by any staff member
- Inspection or maintenance logs produced outside the purview of the QA team in which problems, repairs, or other issues are documented
- Product rejections or recalls
- Internally-identified biological, chemical, physical or other contamination hazards and steps taken to resolve issues
- Logs and checklists for all quality related processes and procedures

Documentation and Record Keeping

A document management system is the cornerstone of any company that must adhere to standards and regulations related to product quality.

All processes and procedures that can affect product quality will be documented. This will include, but is not limited, to the following:

- Each step of the cultivation process including:
 - Raw materials
 - Form of cannabis planted (seeds, clones, vegetative plants)
 - Date of all planting, transplanting and plant transfers
 - Batch IDs with cultivar names, quantities, and other required information
 - Plant counts and canopy area sizes
 - Observations of mold or insect activity
 - Plant inputs and treatments, such as fertilizers and pesticides
 - Tracking of plant health with associated images

- Pruning activities
- Harvesting records
- Instances of batch relabeling or label modifications
- Disposal of hazardous materials and substances
- Environmental Settings and Measurements including:
 - Temperature
 - Humidity
 - Co2 levels
 - Light intensity
 - Air movement
 - Air purity
- Out-of-specification Events and Associated Corrective Actions
- Equipment Maintenance and Cleaning Events
- Facility Maintenance and Cleaning Events
- Lab Test Results
- Records of Product Reprocessing and/or Remediation Events
- Final Quality Assurance Reviews for Each Batch
- Retail Contracts, including any associated production standard agreements
- Sources, Safety Data Sheets and Certificates of Analysis for Raw Materials
- Consumer Feedback or Complaints
- Internal Audits and Quality Assurance Reviews
- Employee Training Records and Milestones Related to Quality Assurance

All documentation will be kept in digital format in addition to hard copy, with backups made regularly and archived in a way that is easy to search in the case of research, inspections or investigations. Archives will be kept for a minimum of 10 years and kept in a secure location only accessible by authorized personnel.

Audits and Self-Inspections

On a schedule established by the QAO and the Executive Staff, the QAO will conduct appropriate audits of each department. The schedule will comply with regulatory and procedural requirements but be flexible enough to accommodate unexpected events. The overall purpose is to ensure that records are accessible and accurately completed according to operating plans, that operation and maintenance activities are following procedures and regulations, to assist Managers in making improvements, and to recognize and learn from departments with efficient systems in place.

The QAO will carry out the audit process as follows:

- Define the focus of the audit
- Prepare by reviewing relevant regulations, operating plans, results of past audits, etc.
- Create or update a checklist for the audit
- Notify the department Manager
- Perform the audit
- Draft an initial findings report
- Identify corrective actions
- Update the findings report with recommended corrective actions and provide a copy to the Manager of the department
- Assist the Manager as needed to carry out corrective actions
- Update the findings report when corrective actions are completed
- Distribute the final report to the Manager, Executive Staff, and the Record Keeper

Within three weeks of being contacted to start an audit, the Manager of the department will schedule an opportunity for the QAO to access the necessary documents or areas.

The Manager or his/her knowledgeable designee will be on site to answer questions during the audit.

Personnel and Training

Training is an integral component of the Quality Assurance system in that it enables individuals to make informed and effective decisions related to the Quality Assurance process. The QAO will assist the Managers of other departments as needed by developing instructional materials, hands-on exercises, evaluation tools, and in-person training modules on issues related to Quality Assurance.

The QAO is responsible for providing an overview to new employees about the Quality Assurance Program. Topics of this training will include:

- The Quality Assurance Plan—purpose, policies and processes
- The purpose and importance of adherence to standard operating procedures
- An explanation of special or periodic training modules that will be required by employees

- Government regulations related to Quality Assurance
- Environmental standards and responsibility
- Cannabis Botany
- Agricultural Production Systems
- Safe and proper use, storage and disposal of fertilizers
- Safe and proper use, storage and disposal of pesticides
- Personal hygiene and ensuring a hygienic work environment

Hygienic Work Processes

In order to ensure product purity and cleanliness, workers will be trained on the following hygiene topics:

- Using personal protective clothing and equipment
- Frequently wash hands, between all tasks and after eating and using the toilets
- The use of hair and beard covers in the work areas
- To stay home when sick
- Properly cleaning and dress of any open wounds
- Adhering to signage that is posted around the facility related to hygiene and safety standards
- Keeping food, drink, tobacco and gum out of the work areas

Each work process will begin with sanitized surfaces, equipment and supplies. Workers will have fresh clothing and, after washing hands, will put on clean disposable gloves. Disinfecting agents and tools will be readily available as the processes occur.

The following standards will apply to work processes:

- Any tool or utensil that is dropped on the floor or on to an unclean surface will be disinfected before continuing its use.
- Any worker who is found to be coughing, sneezing or not feeling well will be removed from the task until the problem is resolved.
- Volatile substances such as cleaning agents will be kept sealed except when being poured for use.

- Messes will be cleaned up immediately after the completion of a task.
- In-process work tasks will not be left unattended.

Building and Facilities

Outside areas of the facility grounds will be kept clean and exterminated for pest prevention. Weeds will not be allowed to grow, and trash will not be allowed to collect. The Odor Control Plan will be implemented to ensure *zero emissions* and that no odors escape the facility at any time.

The facility is designed in a way that keeps clean functions separate from dirty functions. For example, soil and media storage and preparation will be separated from harvesting and drying areas by airlocks and physical distance, so as to avoid unsanitary particles from making contact with harvested plant material. Doors will remain closed and airlocks will be used as needed to avoid cross contamination between different areas.

Sanitation is a key component of product quality, and the construction of the building is an important consideration for good sanitation. Floors, walls, and ceilings will be made of smooth, cleanable surfaces with no texture. Climate control systems will have compressors, blowers, and filters outside of the building when possible and outside of the plant and processing rooms at all times. Filters will be checked and cleaned regularly. Air ducting inside the plant rooms will be easily cleanable and cleaned at regular intervals.

CO2 levels will be kept below 2000ppm at all times in all inside areas of the building. Meters and alarms will be installed to ensure compliance with this limit, and exhaust fans will be used to clear the air if that becomes necessary in the event of a breach. Compressed gasses will be kept in secure areas of the building with appropriate signage and labels.

Rooms within the facility will be checked regularly for any signs of insects, rodent droppings, or evidence of any such pests, and each room will have shelving that is easy to move away from walls for regular cleaning.

To avoid mold outbreaks, climate conditions will be kept consistent over the course of each 24-hour period, within 10% of the ideal setpoints for temperature and relative humidity for plant growth. This type of consistency in a high-wattage, humid indoor environment requires powerful discreet and redundant air cooling and dehumidification systems. Each plant room must have its own separate system to avoid the spread of microbial contaminants if this should occur in a single room. Each air-cooling unit will have a minimum of 4 compressors, each with at least 33% capacity, totally 133% required capacity per room. This allows for a single compressor to fail without altering the temperature and humidity setpoint outside their ideal range.

Equipment

In departments that utilize mechanical equipment, the QAO will work with managers and employees to develop step-by-step procedures and maintenance logs for the use, sanitation, and inspection of each item.

All equipment must be in working order and properly used according to the manufacturer's directions. Personnel will immediately report any damaged, malfunctioning, or inoperable equipment to the Manager or Supervisor.

Equipment used to produce cannabis such as benches, lighting, irrigation systems, HVAC systems, and containers:

- Will be made of materials that can withstand sterilization by common disinfecting agents.
- Will not have crevices that can easily collect dust, pathogens and other substances which could contaminate the product.
- Will have moving parts such as gears, moving chains or fans enclosed or completely covered.
- Will not be made from materials prone to releasing VOC's (volatile organic compounds) or other particles that can become airborne or create dust or odors.
- Will be made from non-toxic, corrosion-resistant, and non-reactive materials, if they come in contact with the product.
- Will ideally be high quality equipment that is not prone to malfunctions. If the equipment needs to be repaired, the use of temporary solutions such as tape should be avoided. Maintenance and cleaning records will be kept for all the machinery.
- Will be designed and positioned to facilitate easy cleaning as well as visual inspection for potential problem areas.
- Will be calibrated on a daily or weekly basis.
- Any equipment, such as trimming machines, that makes direct contact with plant material will be cleaned after every use.
- Equipment maintenance and cleaning logs will be kept for every instance of activity.

All equipment purchases will be accompanied by user and maintenance manuals that will be readily available for employees and inspectors.

Seeds and Propagation Material

Quality Control for commercial cannabis growers begins with plant origin documentation. The Company will document the following information about each selected cultivar in the Company's Cultivar Intake Log and enter it into the inventory system:

- Date of Acquisition
- Breeder Name
- Purchase Point (store/retailer)
- Cultivar Name
- Sex/Gender
- Form of Cultivar (clone, regular seed, feminized seed)
- Expected Traits of Cultivar

Any other documentation that arrives with the cultivars (labels, additional descriptors, breeding history, etc.) will be scanned into the inventory system with the Cultivar Intake Log information.

Seeds and clones will be tested to the degree possible to ensure they are insect- and disease-free. This will be done by tumbling the seeds in a 5% bleach solution for 5 minutes, then drying before sprouting.

Because of susceptibility to insect and disease infestations, acquisition of clones will be done only in rare circumstances. Incoming clones will be quarantined for 14 days, inspected daily, and cleared by a plant pathology lab for common cannabis diseases before being released into the facility for propagation.

All cultivars will be clearly labeled and kept segregated from other cultivars so as to avoid accidental mixing of genetic types.

Cultivation

The Company will carry out each step of cultivation according to the established standard operating procedures and other management specified procedures.

All stages of cultivation and processing will be performed under tightly controlled environmental conditions to maintain product quality. If temperature or humidity vary +/-10% or more during the day or night photoperiods, mold and mildew formation become higher risks.

Soil/Grow Media Standards

Coconut fiber is the cultivation media of choice. It has been selected due to its cost effectiveness, resistance to microbial infections, and because it acts as a natural buffer against over-fertilization and overwatering, should those mistakes accidentally occur. The type used will be RHP certified, which ensures low salt content, sterility, and a chemical-free condition. Each batch, upon delivery to the cultivation center, will be tested for pH and electro-conductivity (EC), to ensure compliance with established purity standards.

Fertilizer Standards

Salt-based fertilizers that are pre-tested will be used to ensure low content of heavy metals and other toxins or residues. Fertilizers will be applied at minimum necessary levels and in a way that minimizes leaching. Leaf tissue mineral analysis will be used to ensure that plants are not receiving too much of any specific mineral element.

No fertilizers, rooting hormones, or plant additives will be returned to bulk containers once they have been removed; once they are poured out for use, they will either be used or discarded.

Water Quality and Sources

The water supply to the building will be filtered by a Reverse Osmosis (RO) System to reduce the soluble substances in the water down to < 0.03 EC. This creates a pure water baseline to avoid having minerals or impurities entering the plant tissue.

The RO System will be tested weekly to ensure compliance within the established purity standard, and filters will be checked and changed monthly, or every 50,000 liters, as recommended by the manufacturer for our usage level.

More than 90% of the irrigation water will be reclaimed from the HVAC and dehumidification systems and used again to irrigate plants. The waste water created by air conditioners and dehumidifiers is technically “distilled” water containing no soluble contents. In practice, the quality and purity of this reclaimed water depends directly on the proper and regular internal sanitation of the climate control equipment, and whether or not it is further filtered before reuse.

In order to rely on reclaimed water being pure and of sufficient quality, the environmental control compressors and condensers must be vacuumed weekly inside the casings. No chemical cleaners can be sprayed into them. Condensate drain lines will need to be flushed every 3 months at the minimum. A condensate filter will be used to sterilize the water and buffer it before it gets topped up with filtered tap water and sent to the fertigation unit for reuse to irrigation plants.

Irrigation

An automated irrigation system will be used to deliver fertilized water to the plants at specified time intervals. This system will be programmed to deliver the quantity and recipe of mineral nutrients that suit each stage of growth for vegetative and flowering plants. The irrigation system will be calibrated and cleaned on weekly intervals. Preventative maintenance will occur on monthly intervals to avoid leaks and other mechanical malfunctions.

Plant Inspection

Employees will inspect the growing plants on a daily and ongoing basis for any signs of nutrient deficiency, pest infestation, or damage indicating any sub-optimal conditions. Any problematic symptoms will be reported to the Manager or Supervisor on duty immediately. Problematic symptoms include, at the minimum:

1. Leaves, stems, or roots with unusual appearance
2. Stunted growth or discoloration of the plant
3. Unusual resin production quantities
4. Unusual odors
5. Any visible mold, mildew, fungus, or other contaminant
6. Insect damage on leaves and stems
7. Visible insects, larvae, or eggs on plants
8. Any other visible evidence of deficiency, disease, or pests

The Manager is responsible for determining what corrective action, if any, is necessary to correct deficiencies, treat disease, or mitigate pests. All treatments will be in accordance with government regulations, including 935 CMR 500.105 and 935 CMR 500.120(9), and will include substances known to be harmless to consumers and documented according to procedures. The Manager is responsible for determining under what circumstances growing plants should be removed from the cultivation area due to deficiencies, disease, pests or any other factor.

Pest Management

Pest prevention and management are critical to cannabis production quality assurance. Infestations and infections reduce product quality, yet so does use of chemicals or the overuse of non-toxic substances to prevent these problems. Therefore, Company plans a strict approach to biosecurity and plant room sanitation, with the intent of preventing and minimizing pest and disease load and the need for any kind of potentially harmful treatments.

The common pests that threaten cannabis plants are: mites, aphids, thrips, and whiteflies. The common diseases that threaten cannabis plants are: powdery mildew, botrytis, pythium, fusarium, hop latent viroid, and tobacco mosaic virus.

IPM (Integrated Pest Management) is an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties. Pesticides are used only after monitoring indicates they are needed, and treatments are applied with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risk to human health, beneficial and nontarget organisms, and the environment.

Prevention, Inspection/Identification and Treatment are the 3 major components of pest management.

Odor Control

The Company is committed to a Zero Emissions facility—meaning that no cannabis odor or noise associated with the Company’s operations will leave the building at the Hull Site at any time while the MTC is operating. The Company’s strategy employs the highest level of technology in odor and noise control, building materials, and professional standards.

A copy of the full odor and noise containment plan as prepared by Mike Grasso, the Company’s Chief Quality Assurance and Production Officer, in collaboration with the Company’s mechanical engineering consultant, C3, and the Company’s consulting scientific and manufacturing consultants, Byers Scientific & Manufacturing.

The Company’s Odor Containment Plan ensures **Zero Emissions**. The Company will employ multiple, redundant odor-control measures operating simultaneously to guarantee a fail-safe facility that will mitigate and prevent any cannabis odor from leaving any area of the facility. Not only will the exterior of the facility be odor-free, but the common areas and patient areas of the facility will also be odor-free—providing a better employee and patient experience.

The Key components of the Odor Containment Plan are as follows:

Building Materials & Design:

1. The design of the building will include a new ***sealed superstructure*** to be erected inside the body of the existing building. This superstructure core will allow us to provide an additional barrier to the outside walls as well as build individual, smaller rooms within the superstructure, thus creating multiple layers of insulation.
2. The building design also situates the grow rooms so that they will be housed in a completely separate building from the offices and MTC dispensary. Each individual grow room exists independently from other grow rooms within a hermetically sealed environment. Each room is equipped with multiple odor control equipment, including air curtains, molecular filtration systems, air handlers, and dehumidifiers. The rooms operate like small ***buildings within a building***.
3. Each of the rooms will have sealed walls and floors that are insulated with DPS-brand, closed cell foam modular panels that provide a ***vapor barrier***, which blocks air from leaking out of each room. This type of technology is typically used in restaurant walk-in freezers.
4. Leading out of each cultivation room will be ***state of the art air curtains*** that will shoot air down and prevent any air from escaping out of those rooms.
5. All doors will be sealed, gasketed and equipped with a mechanical sweep that will also ***prevent seepage of odor particles***.

Scientific Odor Control Technology:

1. An advanced ***molecular filtration system*** will be integrated fully into the newly-designed HVAC systems which will use coconut shell carbon material as our media to destroy cannabis smells. The blend of oils within the specialized formula attracts and captures odor molecules utilizing a scientific method called ***adsorption*** to

neutralize offensive scents. This is not a masking agent but rather a process of eliminating odor particles.

2. ***Independent molecular filtration units*** will be strategically placed in hallways directly outside the grow and processing rooms and other rooms in the facility. These units will independently operate with the same coconut shell material to consistently eliminate odor causing particles.
3. A ***Waterless Vapor System*** will run simultaneously on the exterior of the building, providing an additional odor barrier to give us a “belt and suspenders” approach to eliminate odor causing particles and to meet our commitment to ***Zero Odor Emission***.

Inspection

Employees will inspect the living plants on a daily basis for any signs of pest infestation, mold, or any other type of infection. Any problematic symptoms will be immediately reported to the Manager on duty. Both plant inspections and pest traps will be utilized to evaluate and identify pest types and quantities. Traps provide up-to-date information on pest populations, guiding the type of treatment needed, maximizing a treatment plan’s effectiveness and measuring its success.

Plant inspection techniques include:

- Leaves, stems or roots with unusual appearance
- Stunted growth or discoloration of the plant
- Unusual resin production quantities
- Unusual odors
- Any visible mold, mildew, fungus or other contaminant
- Insect damage on leaves and stems
- Visible insects, larvae or eggs on plants
- Any other visible evidence of deficiency, disease or pests

The Cultivation Manager is responsible for determining what corrective action is necessary to correct the problem. All treatments will be in accordance with applicable laws and only include the use of substances known to be harmless to consumers. The Cultivation Manager is responsible for determining under what circumstances living plants should be removed from the cultivation area due to pests or diseases.

Pest Prevention

Preventing pests from entering the facility involves a combination of mechanical and cultural practices, including, but not limited to:

- A door control, air-lock system between vulnerable sections of the building to prevent pest entry
- Door sweeps and weather stripping that minimize all gaps around all doors and windows
- Spring-loaded doors that ensure that entrances and exits are always closed when not in use
- HVAC, air circulation system designed to maintain positive air pressure in rooms where plants are grown whenever a door opens, keeping air flowing to outer rooms and blowing pests out the door
- Adequate and well-maintained air filters on all air intake vents
- Circulating internal air through carbon, UV, or peroxide-producing filters
- Good air circulation through the plant canopies with oscillating fans
- Immediate quarantine of plants found within the site that show signs of infection or infestation
- Employee cleanliness and clothing/shoe changes before beginning each workday
- Quarantining any new plants for 14 days before integration into the main cultivation area
- Monthly vent/duct cleaning - monitoring weekly
- Intensive daily facility cleaning practices
- Intensive pot/container/tray and cultivation table cleaning
- Good plant pruning practices to avoid crowded plant areas
- Weekly preventative application of non-toxic organic foliar sprays
- Immediate disposal and removal of plant wastes or infected material

Treatment

- Destruction/removal of affected plants
- Spraying or applying root drenches with appropriate treatments for the insect/pathogen in question, using only approved substances according to the manufacturer's instructions
- Beneficial predator bugs will be used when possible to minimize use of pesticides

Records will be kept of all pests identified and pesticides applied.

Harvest

The harvesting of cannabis plants happens between 55 and 70 days after they are placed into the flowering rooms under the flowering photoperiod of 12 hours per day of darkness. Cannabis is at optimal potency and freshness after this period of time.

During the harvesting process, conditions in the room should be kept controlled, with no unusual levels of moisture or heat being allowed.

Workers performing harvest functions use clean scissors and trimmers and also wear face masks, hair covers, and gloves to reduce the possibility of contaminants reaching the flower material. Scissors and other supplies should not touch the soil surface or any other area that could cause them to collect dirt, debris, or other contaminants.

When cannabis is harvested, the roots are allowed to become mostly dry, and the main stem is cut from the base of the plant. Fan leaves are removed, and the plant is divided into multiple branches that are cut to allow for hanging on a harvest cart that is immediately taken to a trimming room when filled. Carts and plastic containers used for containing harvested material will be sanitized before each use and not overfilled. All harvested material must be protected during each step of the process, including during transfer, from contaminants.

Any plant material found to be damaged, moldy, or showing signs of insect presence will be separated and sent to the appropriate department for destruction.

Primary Processing (Trimming/Drying)

Cannabis plants will be trimmed of excess leaf material before they are dried. The harvest carts are taken to the Trimming Room where they are kept as the flower material is trimmed. The Trimming Staff will remove branches from the cart, trim the flower clusters on those branches, and place the trimmed branch back on the cart. The Trimming Staff will track their activities using the Trimming Log (Appendix 4). Once the cart is filled with trimmed branches, it will immediately go to the Drying Room. The conditions in the Trimming Room will be maintained between 65-72°F (18-

22°C) to maintain the biochemical integrity of the plant material. All surfaces in the Trimming Room will be made of easy-to-clean materials and sanitized one or more times per day.

Only a limited amount of plant material will be moved into the Trimming Room at any time, to ensure the purity and consistency of the cannabis. If the trimming staff cannot process a full cart of harvested material within 2 hours, the cart will be moved temporarily to the drying room for safe storage until the trimming staff can handle more material. Accordingly, the harvesting process will be directed to slow down if it is being done too fast for the trimming staff.

Once the initial process of trimming has been completed, the cart of harvested plant material will be taken to the drying room, where it will stay under clean tightly controlled conditions for 10-14 days before going through the final stage of processing.

The Drying Room will be maintained at 55% humidity, 65-71°F (18-22°C), in the dark with air purification and air circulation to ensure no areas of stale air are allowed to cause microbial growth. Plants will be hanging in a way that they do not overlap, so as to avoid areas of anaerobic microbial activity. They will be checked on a daily basis to ensure proper conditions.

After 10-14 days of drying, the carts will be taken back to the Trimming Room, where the dried flower clusters will be removed from their branches (bucked), checked for any final trimming that is required, and collected in a clean container for final bulk and/or retail ready packaging. The contents of the containers will be weighed on a calibrated-approved scale, and the relevant data will be entered into the inventory tracking system. All necessary labels will be attached to the containers to prepare them for storage until sold.

Packaging

In compliance with 935 CMR 500.105, the Company will implement systems for the safe and accurate packaging and labeling of cannabis products. The Company has elected to include some additional industry-standard packaging components, indicated below.

Registration

Each cannabis product that the Company produces for sale will be registered with the Department of Agriculture (hereafter referred to as “the Department”) on provided forms. Each product registration will include a label and the required registration fee, if applicable.

Packaging Assurances

- All harvested cannabis intended for distribution to a licensed cannabis business will be packaged in a sealed, labeled container.
- Any product containing cannabis will be packaged in a sealed, odor-proof, and child-resistant cannabis container consistent with current standards, including the Consumer Product Safety Commission standards referenced by the Federal Poison Prevention Packaging Act (PPPA) and 935 CMR 500.105.

- Only packaging that has a Certificate of Conformity indicating its compliance with the PPPA will be used to contain cannabis products.
- All packaging used will be compatible with the cannabis product it contains.
- All cannabis-infused products will be individually wrapped or packaged where they are prepared at the Company's facility. The packaging of cannabis-infused products will conform to the labeling requirements of the PPPA and 935 CMR 500.105 and will also conform to additional cannabis-specific requirements, outlined in this document.
- Each cannabis-infused product intended for consumption will be individually packaged, will include the total milligram content of THC and CBD, and will not include more than as determined by applicable regulations per package. A package may contain multiple servings of THC, indicated by scoring, wrapping, or by other indicators designating individual serving sizes.

Labeling

Each cannabis product will be labeled before sale, and each label will be securely affixed to the package. The following information will be stated in legible English and any additional languages required by the regulatory agency in a font that is at least [1/16th of an inch] in height based on the lower-case letter "o":

Label Inclusions

- The Company's name, mailing address, and email address for the purpose of receiving product complaints and inquiries
- The common or usual name of the item and the registered name of the cannabis product in boldface type and including the word "Cannabis"
- A unique serial number that will match the product with the Company's batch and lot number to facilitate any warnings or recalls
- The dates of production and final testing and packaging, if sampled, and the identification of the independent testing laboratory
- The date of harvest and "use by" date
- The quantity (in ounces or grams) of cannabis contained in the product

- A pass/fail rating based on the laboratory's microbiological, mycotoxins, and pesticide and solvent residue analyses, if sampled
- A content list containing the following information:
 - minimum and maximum percentage content by weight for
 - THC
 - THCA
 - CBD
 - CBDA
 - All other ingredients of the item, including any colors, artificial flavors, and preservatives, listed in descending order by predominance of weight shown with common or usual names
- The acceptable tolerances for the minimum percentage printed on the label for THC, THCA, CBD, and CBDA will not be below 85% or above 115% of the labeled amount
- A list of major food allergens in an ingestible infused product or a statement indicating if the product was made on machinery that has been in contact with a major allergen
- Use of the term “Recommended Single Portion” or “Manufacturer-Specified Unit” instead of “Serving Size”
- Refrigeration requirements or recommendations if any

The Company will also document and make available information on plant inputs used during the cultivation process, if requested by the consumer. This information will be published on our website.

Label Exclusions

Labels will not contain information that:

- Is false or misleading
- Promotes excessive consumption
- Depicts a person under 21 years of age consuming cannabis
- Includes the image of a cannabis leaf
- Includes any image designed or likely to appeal to minors or that promotes consumption of cannabis

- Contains any seal, flag, crest, coat of arms, or other insignia likely to mislead the purchaser to believe that the product has been endorsed, made, or used by the Government or any of its representatives except where authorized in regulations
- States or implies the product is “organic”
- States or implies the product has the ability to treat or cure health problems

Cannabis products produced by concentrating or extracting/infusing ingredients from the cannabis plant will contain the following information:

- A statement that discloses the type of extraction method, including any solvents or gases used to create product
- All other chemicals or compounds used to produce or added to the concentrate or extract

Warning Statements

All cannabis products will contain warning statements that are readily visible and will not be covered or obscured in any way. The Company will use the appropriate health warnings for packages, as defined and updated by the Massachusetts Cannabis Control Commission and the Massachusetts Department of Public Health.

Labels will show the following warnings:

- "This product contains cannabis and is intended for use by adults 21 and over. Its use can impair cognition and may be habit forming. This product should not be used by pregnant or breastfeeding women. It is illegal to operate a motor vehicle while under the influence of cannabis. Possession or use of this product may carry significant legal penalties in some jurisdictions and under federal law."
- Smokable cannabis will contain the statement "Smoking is hazardous to your health."
- Cannabis-infused products (other than those intended for topical application) will contain the statement "CAUTION: This product contains cannabis, and intoxication following use may be delayed 2 or more hours. This product was produced in a facility that cultivates cannabis, and that may also process common food allergens."
- Cannabis-infused products intended for topical application will contain a statement "DO NOT EAT" in bold, capital letters.

Process Controls

Packaging Managers will develop process controls for employee use, such as SOPs and checklists, to ensure that packaging and labeling activities meet all requirements.

For each commercial weighing and measuring device used, the Company will:

- Ensure that the commercial device is licensed under G.L. c. 98 and the associated administrative rules
- Maintain documentation of the licensure of the commercial device
- Provide a copy of the license of the commercial device to regulatory officials and/or inspectors for review upon request.

Each weighing or measuring device used by the Company for commercial purposes will have a Certificate of Conformance issued by the Commonwealth of Massachusetts Division of Standards, under the administration of the Office of Consumer Affairs and Business Regulation, and will conform to the requirements and specifications required thereby.

Repackaging/Relabeling

The Company may package, repackage, label, and relabel cannabis for retail sale, under specific circumstances.

- The Company will only re-package or re-label infused cannabis products produced at its own facility.
- The Company may re-label the packaged cannabis product with the accurate THC amount, if it is determined during laboratory testing that a cannabis product is labeled with the incorrect amount of THC per package or serving but is within the THC limits for sale.

Testing

Testing Overview

In addition to ensuring that contaminants are below regulatory thresholds, the Company also has cannabis and cannabis products tested before sale and during long-term storage to ensure that they are—and remain—adulterant-free. Further, consumers rightfully need to know the potency,

cannabinoid levels, and any other information that will ensure safe and responsible use of the products.

The product purity standards ensure that consumers are fully informed about solvents that might have been used during production, pesticide residues, and microbial activity. The cannabis and cannabis products are tested and reported on a dry-weight basis.

The testing labs are expected to use either High-Pressure or High-Performance Liquid Chromatography (HPLC), which is the machinery necessary to get accurate results, as well as being an international standard for valid methodology pharmaceutical testing. HPLC analysis facilitates the separation, identification, and quantity of each component in a complex compound substance. It relies on pumps to pass a pressurized liquid solvent containing the sample mixture through a column filled with a solid adsorbent material to separate and analyze individual compounds.

The Company will seek a testing alliance with an external lab that is International Organization for Standardization (“ISO”) certified at the standard of ISO 17025.

Results are meant to represent the average for a batch, to ensure the entire batch is within acceptable limits on all factors, and additionally, that potency and relevant cannabinoid content is determined within 15% accuracy. If allowed, the Company will include terpene content on its packaging and marketing materials, due to these substances becoming more relevant to sophisticated cannabis consumers.

Residual Pesticide Limits:

A cannabis sample shall be deemed to have passed if it satisfies the most stringent acceptable standard for a pesticide chemical residue in any food item as set forth in

Microbiological Test Limits:

	Total viable aerobic bacteria	Total yeast and mold	Total coliforms	Bile-tolerant gram- negative bacteria	E. coli (pathogenic strains) and Salmonella spp.
CO₂ and solvent based extracts	10 ⁴	10 ³	10 ²	10 ²	Not detected in 1 g

Mycotoxin Test Limits:

Test	Specification
Aflatoxin B1	<20 µg/kg of substance
Aflatoxin B2	<20 µg/kg of substance
Aflatoxin G1	<20 µg/kg of substance
Aflatoxin G2	<20 µg/kg of substance
Ochratoxin A	<20 µg/kg of substance

Facilitation of Sample Testing

The Company is responsible for facilitating the laboratory testing of all cannabis products produced. This includes, primarily, making dried bulk cannabis immediately available to agents of a licensed testing laboratory.

- Immediately after the cannabis batch is trimmed, the Chief Compliance Officer will contact a licensed testing laboratory and arrange for a laboratory employee to come to the premises to select a random sample for laboratory testing. The laboratory will test for
 - Microbiological contaminants
 - Mycotoxins
 - Pesticide active ingredients
 - Residual solvents
 - Heavy metals
 - Testing for the purpose of conducting an active ingredient analysis
- Testing Sample – the Company and its representative have specific obligations during the testing sample selection process. We will:
 - Ensure that the batch size from which the appropriate size sample is taken meets the requirements of the Massachusetts Cannabis Control Commission’s regulations.
 - Have a Manager be physically present to observe the laboratory employee obtaining the sample of cannabis material for testing and to ensure that even increments are taken from throughout the batch.

- Record the process with surveillance video, with the batch number stated or shown at the beginning of the video.
- After the sample has been selected, the Manager and the lab representative will sign and date the chain of custody form provided by the testing laboratory attesting to the sample selection having occurred. The form will include:
 - The laboratory's name, physical address, and license number
 - The company's name, physical address, and cannabis license number
 - The Identifying ID of the batch
 - Date and time of the sample collection
 - Printed and signed name of the manager
 - Printed and signed name of the testing laboratory employee who received the sample.
- Company personnel will not assist the laboratory employee or touch the cannabis goods or the sampling equipment while the laboratory employee is obtaining the sample.
- **Laboratory Testing Results** – The Company is responsible for ensuring that any cannabis or cannabis products that get sold or transferred have passed the required laboratory testing.
 - A sample “passes” a laboratory test when the sample meets specifications in the State regulations. The testing laboratory will provide a certificate of analysis (“COA”) showing the test results to the company upon completion.
 - After a batch from a manufactured or harvest batch passes, the cannabis goods may be transported to a retailer.
 - A sample “fails” a laboratory test when it does not meet specifications mandated by the Regulatory Authority.
 - If a batch fails but can be remediated, the Company may arrange for remediation (**See the Remediation section below**).
 - A harvest batch or cannabis product batch that has been additionally processed after a failed result must be retested and successfully pass all the analyses required by the regulatory authority.
 - A harvest batch or cannabis product batch may only be remediated twice. If the batch fails after the second remediation attempt and the second retesting, the entire batch will be destroyed.

The Company will make products immediately available, if requested, to the regulatory authority for the purpose of conducting their own analysis.

If a laboratory returns cannabis or a cannabis-containing product to the Company, it will be disposed of according to the destruction and disposal methods described below.

If a cannabis flower sample does not pass laboratory testing, the following will apply:

- Failure to pass a pesticide chemical residue test will result in the entire batch being recalled and disposed of.
- Failure to pass any other test will result in the batch being only suitable to make an extract, which itself will need to pass all required tests.

Quality Assurance Review (QAR)

When the Company receives a lab clearance stating that the sample meets purity specifications required by law, the Company will complete a Quality Assurance Review Checklist demonstrating that the products meet the criteria below prior to sale. To complete the QAR, personnel must document the following on the Checklist, which becomes part of the master batch record:

- The certificate received from the testing laboratory corresponds to the batch.
- The label on the products is consistent with the certificate regarding cannabinoid content and contaminants required to be listed by law.
- The packaging complies with applicable packaging laws and regulations.
- The QAO will ensure that personnel conducting a Quality Assurance Review have access to the applicable regulations.
- The packaging is tamper evident. “Tamper evident” means a one-time-use seal is affixed to the opening of the package, allowing a person to recognize whether or not the package has been opened.
- The weight or count of the cannabis batch agrees with that in the inventory control system.
- All necessary data has been entered into the inventory control system.

Waste Handling

Pursuant to 935 CMR 500.105(12)(b), the Company will dispose of all cannabis products rendered unusable or by-products of cannabis processing in compliance with all applicable state and federal requirements, including but not limited to, for discharge of pollutants into surface water or groundwater (Massachusetts Clean Waters Act, M.G.L. c. 21, §§ 26 through 53; 314 CMR 3.00: *Surface Water Discharge Permit Program*; 314 CMR 5.00: *Groundwater Discharge Program*; 314 CMR 12.00: *Operation Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Dischargers*; the Federal Clean Water Act, 33 U.S.C. 1251 *et seq.*, the National Pollutant Discharge Elimination System Permit Regulations at 40 CFR Part 122; 314 CMR 7.00: *Sewer System Extension and Connection Permit Program*), or stored pending disposal in an industrial wastewater holding tank in accordance with 314 CMR 18.00: *Industrial Wastewater Holding Tanks and Containers, Construction, Operation, and Record Keeping Requirements*.

No fewer than two Marijuana Establishment Agents must witness and document how the solid waste or organic material containing Marijuana is handled on-site including, but not limited to, the grinding up, mixing, storage and removal from the Marijuana Establishment in accordance with 935 CMR 500.105(12). When the Company's cannabis products or waste is disposed or handled, the Company will create and maintain an electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two Marijuana Establishment Agents present during the disposal or other handling, with their signatures. The Company will keep these records for at least three years. This period shall automatically be extended for the duration of any enforcement action and may be extended by an order of the Massachusetts Cannabis Control Commission.

Method of Destruction

To render cannabis products unusable, the Company will grind the plant or infused product and incorporate the resulting material with other ground materials, so the final mixture is at least 50% non-cannabis waste by volume. No other methods to render cannabis waste unusable will be used unless approved by the Massachusetts Cannabis Control Commission before implementation.

Disposal of Waste

Cannabis waste will not be sold.

Disposal of the cannabis waste rendered unusable will be delivered to a permitted solid waste facility for final disposition.

All waste and unusable product will be weighed, recorded and entered into the ICS prior to mixing and disposal. Verification of this event shall be performed by a supervisor and conducted in an area with video surveillance.

Upon the destruction and disposal of any tagged item, the associated RFID will be retired from the inventory control system. Records related to the batch, destruction and disposal of the product associated with the RFID will be retained for 5 years.

Detailed information on cannabis and non-cannabis Waste Management can be found in the Waste Management Plan.

Complaints Handling and Recall Plan

The QAO will develop a Complaints and Recall Response Team, with backup team members, which will be responsible for recording and investigating complaints. Contact information for the team members will be posted on a contact list. The Team will be composed of the following:

- **Response Team Leader:** This person, who may also be/is the Compliance Officer, has the authority to make the decision to initiate a Recall and make other important decisions quickly. The Team Leader will:
 - Oversee the training of all team members
 - Ensure that records of related training are provided to the Record Keeper for archiving
 - Plan and carry out mock Recalls at least once per year to provide practice to the team and review effectiveness of the system
 - Be responsible for notifying the regulating agency if a Recall is initiated by the company
 - Contact any vendor who may have supplied an input product that contributed to the issue leading to the complaint
 - Determine when a Recall is considered complete and ensure all documentation is finalized and forwarded to the Record Keeping Manager
- **Response Team Coordinator,** who may also be the Quality Assurance Officer will:
 - Oversee the response activities
 - Assign individual tasks to Team Members
 - Work with the Record Keeper to collect all records related to the product

- If a Recall is implemented, contact the licensees who purchased the products or draft a script for team members to use to make the calls if numerous licensees are involved.
- **Inventory Control Manager (ICM):** Is responsible for pulling all records from the Inventory Control System (ICS) related to the product and updating the ICS with recall, destruction, disposal, and other information to be recorded.
- **Team Members:** These individuals will be tasked with the following according to the directions of the Coordinator:
 - Reviewing records to track back the contents of the product and, if applicable, all inputs to the product from the time the cannabis plant was germinated or cloned
 - Contacting/interviewing individuals who may have been affected by the product according to the Complaint Form
 - Arranging for a Transportation Agent to pick up all recalled items from other licensees, if applicable
 - Arranging for financial reimbursement to the licensees for the returned products
 - Storing recalled products in a secured location
 - Other tasks as needed

Regular employees will be trained to refer complaints of this type to a Team Member to handle complaint response. The process will ensure that any personal or medical information associated with an individual reporting an adverse event will be protected as sensitive information, stored in a secured location, and disposed of once it is no longer needed.

The Company's policies for handling complaints will be sufficient to deal with any potential public health issues or other product problems within a safe and expedient time frame. Recalls may be initiated at the request of the Massachusetts Cannabis Control Commission or may be a voluntary action by the Company to remove defective or potentially defective cannabis from the market or to otherwise promote public health and safety. This plan includes the following components:

- A mechanism for recording complaints about a product
- A method to evaluate the level of hazard caused by the product
- A mechanism to contact dispensaries or other licensees who have purchased products from the batch in question
- A mechanism to contact a vendor that provided a product that contributed to the failure of a test (example: a growing medium found to contain heavy metals)

- Policies for communicating with all relevant agencies within 24 hours of discovering defective or potentially defective cannabis
- Policies for destruction of any recalled cannabis product
- A questionnaire to guide the investigation process

The Company will not sell a product from a batch that has failed a laboratory test or resubmit the same failed product unless the lab is likely to have made an error. The product will be remediated before being retested and potentially sold.

Properly handling product complaints is an essential part of the Company's Quality Assurance System. The ability to document, investigate, and correct issues related to product complaints provides us with a valuable opportunity for improvement. The establishment of appropriate corrective and preventive actions can lead to increased customer satisfaction, product safety, and increased market share.

- A manual and electronic system will be established to track and manage product complaints. This system ensures that complaints are appropriately investigated, that the potential or actual product quality or health risks are identified, and Corrective And Preventive Actions (CAPA) are implemented. Recurring similar complaints may not require a new Health Hazard Evaluation or further investigation but may require CAPA.
- A unique control number (Complaint ID #) will be issued to each product complaint as well as a category (e.g., medical vs. non-medical), type of complaint (e.g., particulate, discoloration, off-odor, labeling, defective product, etc.), and prioritization.

Complaints

Complaints about product quality may be medical or non-medical. Medical complaints may range from a customer experiencing minor discomfort to a serious event requiring hospitalization. Non-medical complaints may relate to defects or other issues, such as abnormal taste, packaging errors, contamination with foreign objects, etc.

An "adverse event," for the purposes of this document, is defined as any negative medical occurrence associated with the use of a consumable or topical product, whether or not considered drug related.

Complaints Procedure

1. Product labeling will include contact information for the Company that allows consumers to promptly and easily report complaints.
2. Upon being contacted about a complaint, a Complaint Response Team Member will fill out a Complaint Form with all available information. The Team Member will assign a

Complaint ID # and write it on the form, print out a blank Complaint Response Checklist, attach it to the completed form, and immediately provide the documentation to the Team Leader. If the Team Leader is not available, the Coordinator will be notified. If the Coordinator is not available, a member of the Executive Staff will be notified. The Team Member recording the complaint must notify one of the people listed above and get a response. The forms may not be left in an in-box, nor will leaving voice messages or sending texts be considered a means of completing this task unless the person responds within 10 minutes with instructions on how to proceed.

3. The Team Leader will complete a Health Hazard Evaluation Form. *If it becomes immediately clear during the early part of the process that a serious health issue that could involve hospitalization or death is imminent due to a defect in a cannabis product, the Team Leader will initiate a Recall without delay before completing the Health Hazard Evaluation.*

If no health risk to the public is expected, all documentation will be collected, forwarded to the Record Keeper, and a report on the result will be issued to the Executive Staff. No further effort would be required.

Recalls

A product Recall is the process of retrieving defective and/or potentially unsafe cannabis goods from stores and consumers. The Company will ensure that recalls occur comprehensively and expeditiously.

A Recall is implemented in order to retrieve products that may be responsible for an adverse event. A Recall may also occur if a product is found to have or is suspected of having a defect that could lead to a risk to public safety, in which case a Health Hazard Evaluation Form will be completed to determine the need to begin a Recall.

A Recall may be initiated under the following circumstances:

- Consumer complaint(s) - likely received through a dispensary or other licensee
- A notification from the Massachusetts Cannabis Control Commission
- A discovery during internal operations indicating a product safety issue

Recall Procedure

Once it is determined that a Recall is necessary, Steps 1 through 3 of the Complaint Response process will have been carried out and recorded on the Complaint Response and Recall Checklist. The process will continue with Step 4 below.

4. The Team Leader will notify the CEO, who will contact the Company's legal counsel to determine an appropriate media response.

5. The Team Leader will notify the Massachusetts Cannabis Control Commission within 24 hours of notifying the Company's legal counsel, if the Massachusetts Cannabis Control Commission did not initiate the Recall.
6. The Team Leader will activate the Team to begin the Recall process.
7. To determine the scope of the recall, the Team will gather the information to answer the following questions:
 - A. Have any disease or other health issues already occurred from use of the product?
 - B. How serious is the health hazard?
 - C. What are the immediate and long-term consequences?
8. Based on the responses to the questions in the item above, the Team will determine which of the following FDA class levels of Recall applies.
 - **Class I:** A situation where serious (possibly even fatal) health consequences may result if the product is consumed. Examples include Listeria or Salmonella in food. A public alert is usually issued.
 - **Class II:** A situation where a health hazard might exist but the probability is remote. A public alert may be issued. An example is a food containing an undeclared allergen.
 - **Class III:** A situation where a food violates federal regulations, but is unlikely to cause adverse health consequences, and where a public alert is not usually issued. An example is a food with a minor labeling issue.
 - **Market Withdrawal:** A situation where a food has a minor violation that is not in violation of any food safety laws. The products may be withdrawn from the market without initiating a full recall.
9. The ICM will print a list of all purchasers of the affected batches, including all contact information, and a complete list of affected products delivered to each licensee.
10. The Team Coordinator will draft an email and phone script containing the following information and have it approved by the Team Leader:
 - The description of the product and the associated Inventory Control numbers
 - A description of the issue and any potential health problems, if applicable
 - Whether the products will be subject to a full Recall or withdrawn from the market
 - Instructions for returning the product to receive a refund or credit

- A means through which the licensee may return documentation, such as a Response Form, to indicate that the licensee received the notification and followed through on completing the Recall process.
11. The recalled products will be stored in a secured location and clearly labeled as “Recalled Materials.” Undistributed items from the batch will be collected added to the recalled items.
 12. Manifests will be created and Transportation Agents will be dispatched to collect all recalled products.
 13. The ICM or a designee will update the Inventory Control System with all appropriate information.
 14. The ICM will maintain a list of items that have and have not been returned and print or fill in a Recall Recovery Summary (Appendix 10).
 15. The returned materials will enter into the destruction and waste disposal process as previously described.
 16. The ICM or a designee will update the Inventory Control System with all appropriate destruction and disposal information.
 17. The Team Leader will initiate the Root Cause Investigation Procedure (see next section).
 18. The Team Leader will report the outcome of the Recall to the Executive Staff. See item 4 in the section below for a list of what should be included in the report.
 19. This Complaints Handling and Recall Plan and associated forms will be updated to improve the effectiveness of the system, if applicable.
 20. The Team Leader will review the documentation to ensure that all forms and supporting materials have been completed and collected, then forward the package to the Record Keeper for archiving.

Root Cause Investigation

In conjunction with conducting a Recall to retrieve all faulty products, the Company will conduct a Root Cause Investigation to determine what materials, processes, or conditions led to the contaminated or faulty product.

Root Cause Investigations should be completed within thirty (30) calendar days of receipt of the complaint. Reasons for exceeding the timeframe for closure of the root cause investigation should be documented in the complaint file.

- If available, two samples from the recalled batch will be sent to an independent testing laboratory approved by the Massachusetts Cannabis Control Commission to perform required testing. The Company will request that the testing laboratory perform a comprehensive array of tests to determine if specifications were met, including the testing of pesticides, cannabinoid profile, and any other tests that may aid the investigation.
- If any deviation or omission of procedure appears to have occurred, the Team will initiate prompt personnel interviews to determine the cause of the deviation.
- The final investigation report should include the following:
 - A clear statement of the reason for the investigation.
 - A summary of the aspects of the process that may have caused the problem.
 - The results of a documentation review, with the assignment of actual or probable cause.
 - The results of a review made to determine if the problem has occurred previously.
 - A description of corrective actions taken.
 - A description of why the investigation is considered closed.

Documentation and Record Keeping

The Record Keeping Manager will file and store all of the following information about all complaints:

- Forms documenting the original complaint with attached backup documentation.
- Any records showing non-compliance with procedures that contributed to the issue.
- Records recording the results of interviews with employees.
- Pre and post-event test results on the product batch.
- Copies of letters or logs showing contact with other companies, customers, and the regulating authority.
- The final report of conclusions after completion of the investigation.
- Documentation of actions taken to prevent a repeat of the complaint.
- Documentation of the disposal of the contaminated products.
- The final copy of the Root Cause Investigation Questionnaire and all attachments.
- Any additional documentation or relevant communications resulting from the Complaint Response process.

Management Review and Archiving

Controls will be put in place to ensure appropriate management review and evaluation of all product complaints, identified trends, implementation of corrective and preventive actions, and final approval by the Quality Assurance Officer for complaint closure or product Recall for finished products (where necessary).

The archival system will contain all closed product complaint files and make these documents easily retrievable and readily available for inspection and internal audit. Records should be maintained for a period of 1 year after the date of expiration of the product. If the product does not have an expiration date, maintain complaint records for 1 year after the date the complaint was received.

Appendix 1 - Cultivar Intake Log

Date of Purchase:	Breeder:	Purchase Point:
Cultivar:	Form: (Clone/Regular Seed/Fem Seed)	Sex/gender:
Traits:	Comments:	

Date of Purchase:	Breeder:	Purchase Point:
Cultivar:	Form: (Clone/Regular Seed/Fem Seed)	Sex/gender:
Traits:	Comments:	

Date of Purchase:	Breeder:	Purchase Point:
Cultivar:	Form: (Clone/Regular Seed/Fem Seed)	Sex/gender:
Traits:	Comments:	

Date of Purchase:	Breeder:	Purchase Point:
Cultivar:	Form: (Clone/Regular Seed/Fem Seed)	Sex/gender:
Traits:	Comments:	

Date of Purchase:	Breeder:	Purchase Point:
Cultivar:	Form: (Clone/Regular Seed/Fem Seed)	Sex/gender:
Traits:	Comments:	

Date of Purchase:	Breeder:	Purchase Point:
Cultivar:	Form: (Clone/Regular Seed/Fem Seed)	Sex/gender:

Traits:	Comments:	
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Appendix 2 - Quality Assurance Review Checklist

Date Inspected:	Product Description:	Batch Number:

Completed By:		Other ID or Code (if applicable):	
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Analysis Results

YES	NO	N/A	Regulation
			The batch and other identifiers on the Certificate of Analysis (COA) from the lab matches the batch labels
			The label on the products is consistent with the COA regarding cannabinoid content and contaminants as required by law

General Provisions

YES	NO	N/A	Regulation
			The weight or count of units matches the Inventory System
			Information required on the label is written in English
			The label is unobstructed and conspicuous so that it can be easily found by the consumer
			Label information is located on the outside container or wrapper of the finished product

Primary Panel Labeling Requirements: All Products

YES	NO	N/A	Regulation
			The identity of the product in a text size reasonably related to the most prominent printed matter on the panel
			The universal symbol as prescribed in regulatory requirements
			The net weight or volume of the contents of the package
			The THC content and CBD content for the package in its entirety, expressed in milligrams per package

			The primary panel text must be in type size no less than 6 point font and be in relation to the size of the primary panel and container
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Additional Primary Panel Labeling Requirements: Edible Products

YES	NO	N/A	Regulation
			The words “cannabis-infused” immediately above the identity of the product in bold type and a text size larger than the text size used for the identity of the product
			The THC content and CBD content per serving, expressed in milligrams per serving

Informational Panel Labeling Requirements

YES	NO	N/A	Regulation
			The licensed manufacturer and its contact number or website address
			The date of the cannabis product’s manufacture
			If the cannabis product is intended for sale in the medicinal market, the statement “For Medicinal Use Only”
			A list of all product ingredients in descending order of predominance by weight or volume
			If an edible product that contains an ingredient, flavoring, coloring, or an incidental additive that bears or contains a major food allergen, the word “contains,” followed by a list of the applicable major food allergens
			If an edible product, the names of any artificial food colorings contained in the product
			If an edible product, the amount, in grams, of sodium, sugar, carbohydrates, and total fat per serving
			Instructions for use, such as the method of consumption or application, and any preparation necessary prior to use
			The product expiration date, “use by” date, or “best by” date, if any
			The UID and, if used, the batch number
			The informational panel text is in a type size of no less than 6 point font

Labeling Restrictions - The label does not contain any of the following:

YES	NO	N/A	Regulation
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			Inaccurate claims regarding where the cannabis was grown
			The name of a particular county unless the cannabis used to produce the product was physically grown there
			Content that is or designed to be attractive to individuals under the age of 21
			Any information that is false or misleading
			Any health-related statement that is untrue or misleading

Packaging

YES	NO	N/A	Regulation
			The package protects the product from contamination and does not expose the product to any toxic or harmful substance
			The package is tamper-evident (the product is packaging that is sealed so that the contents cannot be opened without obvious destruction of the seal)
			The package is child-resistant
			The package does not imitate any package used for products typically marketed to children
			If the product is an edible product, the package is opaque
			If the package contains more than one serving of a cannabis product, the package is re-sealable in a manner such that child-resistance is maintained throughout the life of the package

Comments (Please include date and initials): Enter this completed form into the official record for the associated batch number and forward a copy to the Record Keeping Manager.

Appendix 3 - Pesticide Application Log

Pesticide Application Log - Single Instance	Enter Information in every field below
Property Address	
Date/Time of Application	
Canopy size and Batch ID of Area Treated	
Director of Task	
Copy of Substance Label (attach)	
Person Who Supplied Substance	
Trade Name	
Total amount mixed	
Quantity & Concentration	
Summary of Event, Equipment, Device/s, Apparatus Used:	

Appendix 4 - Trim Log

DATE: _____ EMPLOYEE NAME: _____

[illegible]

Appendix 5 - Complaint Response Team Contact List

Up-to-date contact information is to be posted in the following locations:

- Xxx
- Yyy
- Zzz

Role	Name	Work Phone	After Hours Phone	Responsibilities
Team Leader				<ul style="list-style-type: none"> • Oversee training and related record keeping • Plan/conduct drills • Determine when Recall necessary • Notify agencies/vendors • Determine when Recall complete
Team Coordinator				<ul style="list-style-type: none"> • Oversee investigation • Assign tasks • Collect archived records • Contact licensees or provide script to team members
Inventory Control Manager				<ul style="list-style-type: none"> • Produce related records from ICS • Update records as process proceeds
Team Member				<ul style="list-style-type: none"> • Complete tasks as assigned
Team Member				<ul style="list-style-type: none"> • Complete tasks as assigned
Team Member				<ul style="list-style-type: none"> • Complete tasks as assigned
Backup Team Member				<ul style="list-style-type: none"> • Be on call during assigned time periods
Backup Team Member				<ul style="list-style-type: none"> • Be on call during assigned time periods
[Chief Executive Officer]				<ul style="list-style-type: none"> • Contact legal counsel • Manage media response
Dept. of Ag Contact				

Appendix 6 - Complaint Intake Form

Date: _____ Time: _____ Completed by: _____
Assigned Complaint ID #: _____ (Place on all related documentation)

Name of licensee making report: _____
Name of person making report: _____
Contact info of person making report: _____

Date ingested/used: _____ Time: _____
Complaint description (odor, color, taste, object in food, allergic reaction, illness, etc.)

If someone became ill, name and contact info:

Age: _____ Allergies/pre-existing conditions: _____
Date/time of symptoms- Started: _____ Ended: _____
Detail of symptoms: _____

Did person see a doctor? () Y () N Date of visit: _____
Doctor's contact info: _____
Doctor's diagnosis: _____
Attach results of any tests.

Was person hospitalized? () Y () N Date(s): _____
Hospital's name, address, and contact info: _____
Reason for hospitalization: _____
Attach results of any tests.

Information about the product in question: Batch #: _____
Brand name: _____ Product ID #: _____
Description: _____
Expiration Date: _____
Date and location of purchase: _____
Recommended dosage: _____
Recommended duration of use: _____
Amount of product consumed/used: _____
Over how many hours/days: _____
How product was stored before use: _____
Does any of the product remain?: () Y () N
If yes, has it been tested for contaminants?: () Y () N
If yes, which contaminant was present? _____ Attach results.

Other agencies/offices the consumer has notified: _____

Other comments from the licensee/consumer and/or additional notes:

Attach a blank Recall Checklist to this completed form and
forward both to the Complaint Response Team Leader.
[\[Have your legal counsel confirm that all of these questions may be asked in your state.\]](#)

Appendix 7 - Complaint Response & Recall Checklist

Complaint ID #: _____

- ☐ Complaint or other discovered issue entered onto a Complaint Form. (Step 1, Appendix 6)
- ☐ Forward documentation to Complaint Response Team Leader. (Step 2)
- ☐ Collect information required to fill out Health Hazard Evaluation Form (Appendix 8) and complete form. (Step 3)
- ☐ If no health risk to public is expected, collect all documentation, forward to Record Keeper, and report on result to Executive Staff. (Step 3A) *No more effort is required.*
- ☐ Notify CEO and legal counsel to determine media response. (Step 4).
- ☐ Notify Massachusetts Cannabis Control Commission. (Step 5)
- ☐ Activate Team to begin Recall process. (Step 6)
- ☐ Determine the scope of the Recall (Step 7)
- ☐ Determine Recall level (Class I, II, III or Market Withdrawal). (Step 8)
- ☐ Inventory Control Manager (ICM) creates list of purchasers. (Step 9)
- ☐ Team Coordinator drafts email and phone script based on list and has it approved by the Team Leader. (Step 10)
- ☐ Emails sent, follow up phone calls completed, Recall Communication Log (Appendix 9) completed. (Steps 11)
- ☐ Set up secured storage location for recalled items. Deposit any undistributed items from batch. (Step 12)
- ☐ Create transportation manifests, dispatch Transportation Agents to retrieve products. (Step 13)
- ☐ ICM updates the Inventory Control System for each retrieved product. (Step 14)
- ☐ ICM creates list of products returned/not returned and maintains the Recall Recovery Summary (Appendix 10). (Step 15)
- ☐ Arrange for the products to be destroyed and disposed of. (Step 16)
- ☐ ICM updates the Inventory Control System with disposal info. (Step 17)
- ☐ Team Leader initiates a Root Cause Investigation. (Step 18)
- ☐ Team Leader reports outcome to Executive Staff. (Step 19)
- ☐ Update the Recall Plan and forms, if applicable. (Step 20)

☐ Team Leader gathers and reviews all records; forwards package to Record Keeper. (Step 21)

Date completed: _____ Team Leader Signature: _____

This form includes the primary steps for completing the Recall process. See the Complaint Handling and Recall Plan for more specific details.

Appendix 8 - Health Hazard Evaluation Form

Answer the following questions and attach supporting documentation.

Date: _____ Time: _____ Complaint ID #: _____

Pg 1 of 3

Completed by: _____

Describe the problem - Adulterated product (microbial, chemical, or other contamination), misbranded product, incorrect label, unintentional object found, etc.

What illnesses or other symptoms have already occurred from use of the product?

What documentation exists that shows a link between the health problem or injury and use of the product?

Did the consumer use the product according to label directions? If yes, was the health problem or injury the result of 1) product quality (contamination); 2) inadequate instructions for use; 3) problem with packaging; or 4) other known or unknown causes?

List potential factors in the production process that could have contributed to the type of issue that has occurred. Unsafe irrigation water? Other contaminated inputs? Lack of sanitation? Other? Consider as many options as possible to narrow down causes. A separate list may be attached and the most likely causes discussed here. How could these issues have contributed to the problem?

If a contaminant is involved that could make people ill, what portion of the population may be most affected (people with terminal illnesses, compromised immune systems, etc.?) How severe is the hazard to the listed groups?

Select the level of severity that could result if the population is exposed to the contaminant:

- | | |
|---|------------------------------|
| A. Life threatening: possible death | D. Limited: short-term minor |
| B. Severe: permanent significant disability | disability/complaint |
| C. Moderate: temporary significant disability | E. None |
| or permanent minor disability | |

Explain:

How many people have become ill or injured to date? _____
What is the likelihood that more people will become ill or injured? _____

If no issues have been reported yet, what is the likelihood that an illness or injury could occur in the vulnerable populations listed above or in the general population?

What are the immediate and long-term consequences of the hazard?

☐ Check here if a Recall is recommended.

If a Recall is not recommended, summarize the justification for the decision here:

Complaint Response Team Leader

Printed Name: _____

Signature: _____

Appendix 9 - Recall Communications Log

Complaint ID #: _____

The Complaint Response Team Coordinator is responsible for ensuring the accurate completion of this log.

Licensee	Date/Time Email Sent	Date/Time of Follow-up Call	Name of Team Member Making Call	Name of Person Receiving Call	Date Response Form Received

Date completed: _____ Team Coordinator Signature: _____

Appendix 10 - Recall Recovery Summary

Complaint ID #: _____

If the counts are changing, the form will be considered a draft. The line with the old information may be crossed out and a new line with updated information filled in. Once no more changes are expected, a new final form will be completed, dated and signed. The draft copies will be retained for archiving.

Licensee	Item Description	Count of Items Distributed	Count of Items Recovered	Date/Time of Count	% Recovered (complete on final version)

Page _____ of _____

This version is a ☐ Draft / ☐ Final Date of Final: _____

ICM Signature on Final: _____

Appendix F: Security Plan (Provided by Kroll)

October 20th, 2020

Security Narrative

Proposal Prepared for Latitude 42 Therapeutics, LLC
120 Nantasket Avenue
Hull, MA 02045

Report Status: [Draft Report]

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I represent Latitude 42 as their security consultant. I am submitting the following proposed security plan on behalf of LATITUDE 42. These plans were developed in accordance with 935 CMR 500.000 Cannabis Control Commission regulations, Town of Hull Ordinances, and industry best practices using the principles of Crime Prevention Through Environmental Design (CPTED), and my 33+ years of law enforcement and security experience. I have provided security consulting services for the past years to numerous clients in various industries including cannabis companies in Massachusetts.

Our proposal is to locate a marijuana cultivation and medical Establishment at 120 Nantasket Avenue Hull, MA 02045. I believe that the security plan for LATITUDE 42 outlined below meets all the requirements of the town of Hull and will ensure a minimal impact on public safety services of the City of Waltham .

The security system for LATITUDE 42 dispensary in Hull, MA is designed to provide a safe and secure environment for staff, the public, and storage/handling of marijuana in compliance with Code of Massachusetts Regulations 935 CMR 500.110.

Kroll also considered security principles of Crime Prevention Through Environmental Design (CPTED), Concentric Circles of Protection, and Integrated Design when evaluating opportunities to deter a threat from entering and circulating within the building envelope. CPTED is a concept that utilizes planned passive resources, such as architectural barriers, landscaping, and lighting to reduce the necessity of traditional technical and operational security elements, to reduce vulnerability to crime. The key concepts of CPTED include: Natural Access Control: Use of doors, fences, landscaping, and other man-made and natural obstacles to limit access into the building or other defined interior space. Natural Surveillance: Increasing visibility by occupants and observers (security and staff) to increase the detection of unauthorized individuals or misconduct within a facility. Natural Boundary Definition: Establishing a sense of ownership by occupants to increase vigilance in identifying intruders. This sends the message that would-be-offenders will be identified.

The concept of “Concentric Circles of Protection” is based on varying levels of protection originating at the site perimeter, building perimeter, lobby areas, and interior areas with special control requirements and becoming increasingly more stringent as one proceeds through each level to reach the most critical areas. Intervention zones between each layer of the circle provide opportunities for control, detection, evaluation, and response to undesired activity, intruders, or other unauthorized individuals.

The Integrated Design Philosophy establishes effective security through the integration of electronic systems with architectural elements, enhanced by security staff and procedures. When the integration of these elements is effectively executed, a synergy is created that meets the desired security objective. The premise for using this concept is that architectural, operational and electronic elements must be implemented to complement one another; thereby creating collaboration between them that results in a strong security program. No one element of the group can stand-alone or operate independently and provide adequate protection. Specifics of the elements used include:

Architectural Security measures address items such as perimeter barriers, lighting, critical building services, spatial adjacencies, and control barriers.

Operational Security measures address items such as staff and public access control, staffing, monitoring, and administration of systems.

Electronic Security measures address items such as access control and alarm monitoring, video surveillance, and security communications.

Security Measures

Security measures for the LATITUDE 42 dispensary consist of both physical barriers and electronic

systems that work in concert to provide a robust security program. These measures include:

Secure Door and Window Hardware

Security Mesh

Primary Intrusion Alarm System

Backup Intrusion Alarm System

Video Surveillance System Access

Control System

Door Interlock System Door

Intercom System

Physical Security Measures

Measures will be employed by LATITUDE 42 that ensure a secure physical perimeter is provided around their entire tenant space as well as walls surrounding the Secure Storage/Limited Access Area (LAA). Where concrete block construction is not used, security mesh and plywood will be utilized to harden ceiling and perimeter walls of the LAA to deter penetration from adjacent space.

Perimeter doors and designated interior doors separating dispensary functions will be provided with locking hardware which will remain secure except when accessed by authorized persons. Perimeter glass for the dispensary will be limited. All perimeter glass will be non-operable and will have laminated glass or security mesh inside to prevent intrusion. Security personnel will validate persons before they are permitted to enter the facility and then again to enter the sales showroom.

Intrusion Alarm Systems

Intrusion detection for the LATITUDE 42 dispensary is comprised of two independent commercial-grade alarm systems – a primary and a backup – to ensure any intrusion will be detected and reported should a failure of either system occur. The primary alarm system (PAS) and the backup alarm system (BAS) will be installed, serviced, and monitored by separate security vendors to ensure redundancy. Control equipment for the PAS and BAS will be located in the Security Room, which will have restricted access.

Perimeter detection of an intrusion is provided using door contacts on perimeter doors and glass break detection for perimeter glass. Interior intrusion detection is provided by motion detection throughout the dispensary and in the LAA. In addition to intrusion devices, hold-up/panic alarms will be provided at point of sale locations within the sales area, in the Security Room and in the LAA. The intrusion alarm systems will be controlled by numeric keypad arming stations located inside the main entry and exit doors. Keypads will display system armed/disarmed status, status of security devices

and any trouble notifications. Authorized users will be issued unique arm/disarm codes to identify who armed or disarmed the systems at a given time. A special duress alarm code will be provided at each PAS and BAS keypad arming station to notify law-enforcement that an authorized user has been forced by an intruder to disarm an alarm system.

The PAS and BAS provide separate detection of intrusion for all perimeter door and window contacts, glass break detectors, and motion detectors to ensure a device failure on one system will not compromise intrusion detection by the other. Both systems will have backup batteries for continued operation during power failures for up to twenty-four hours.

Video Surveillance System

The video surveillance system (VSS) is comprised of network-based video cameras and network-based head-end equipment for viewing, recording and playback of security video. VSS head-end equipment will be located in the Security Room to ensure access is restricted and limited to the security function. Exterior cameras will be located around the perimeter of the building, at doors and the side driveway area to monitor and record activity around the dispensary tenant space. Interior cameras will be provided in dispensary areas and in the LAA. The system will provide monitoring and recording of all cameras to aid in identifying all who enter or exit the dispensary and areas where controlled products will be stored, processed, handled, and sold. Monitoring and operation of the VSS will be provided in the Security Room.

The VSS will retain camera footage for a minimum of 90 days and retain (at minimum) the last 24 hours for immediate retrieval and playback. The VSS will save or archive video relating to a particular incident under investigation or pending legal/administrative action for as long as necessary and export still images to industry standard formats. Additionally, the VSS will have an uninterruptible power source for continued operation during a power failure for a minimum of four hours or for thirty minutes should an emergency backup generator be provided for extended backup power.

Access Control System

A proximity card access control system (ACS) will be provided at the perimeter and designated interior doors, including the LAA door, to limit access only to persons issued a valid access card and within their allotted day and time schedule. Each person will be authorized to enter only those doors required in the performance of their duties. Persons accessing the LAA will be required to present a valid access card and enter a unique personally identifiable numeric code before entry is granted. All user activity will be logged by the ACS. Vandalizing or tampering with the ACS card reader on the unsecure side of a door will not unlock the door. The ACS controller will be located in the Security Room and be provided with backup power supply to ensure operation during a power failure for a minimum of four

hours; or for thirty minutes in the event an emergency generator is provided for extended backup power.

All authorized personnel will be issued a photo ID badge that also acts as the card to access the controlled doors. Personnel names and photos will be printed on the card. All personnel will be required to wear their photo ID badge at all times while on the premises. The cards will employ contactless smartcard technology with unique card numbers. Only cards programmed into the ACS will work at the dispensary. The manufacturer will track the individual card numbers to ensure card

numbers are not duplicated. These card security measures will help ensure that only authorized personnel will have access to the dispensary facility. The access control system will also include a visitor management function that will record visitors to the dispensary facility, store personal information, and print visitor badges.

Door Intercom System

An intercom system is provided to allow Security Room personnel to communicate with persons at the Exterior Entry Vestibule door should the door be locked during business hours for any reason. The intercom system will allow the entry door to be remotely unlocked from the Security Room to allow vetted persons into the Entry Vestibule.

Door Interlock System

An exterior and interior door at entry and exit points of the dispensary form a vestibule which will be configured similar to a mantrap to ensure authorized persons entering or exiting cannot allow an unauthorized person into the dispensary Sales Floor. The interlocked doors are controlled such that only one vestibule door can be opened at a given time. Doors are logically controlled by a controller located in the Security Room. Door release buttons are provided at the reception desk for the entry doors to allow authorized persons to enter the Entry Vestibule, and once verified, will be allowed to enter the Sales Floor.

The exterior entry door is unlocked during business hours to facilitate access into the Entry Area. Once inside the Entry Vestibule, a person must check in at the Security Room transaction window. Once properly vetted, the security officer unlocks the interior Sales Floor door, which interlocks the exterior Entry Vestibule door. When the interior door is closed and locked, the exterior entry door is unlocked. After hours, the exterior Entry Vestibule door is locked by the ACS. The exterior Entry Vestibule door may be locked during business hours for additional security and vetted persons let in via the door intercom system.

When exiting the Sales Floor, a person pushes the exit bar to open the interior Sales Floor exit door. Once inside the Exit Vestibule, the interior Sales Floor door must be closed and secure before the exterior Exit Vestibule door can be opened to exit the building. While the exterior Exit Vestibule door is open, the interior Sales Floor door is interlocked to prevent it from being opened until the outer exit door is closed and secure. Note: The interlock door controls will be overridden as required by life safety code.

Policies and Procedures

LATITUDE 42 Good Neighbor Agreement

Concerns have been raised in some communities that an adult use dispensary will create more open-air marijuana use in and around the area. Kroll notes that increased use in the area has not been the experience of other facilities. Any first-time visitor to the facility will have to sign a good neighbor pledge acknowledging the current laws and regulations regarding the use of cannabis. They will be provided with educational material that will inform them how to safely consume and store their purchases, as well as a warning that anyone found to violate the good neighbor agreement by consuming in public, diverting product to unauthorized persons, or engaging in impaired operation of a vehicle will be trespassed from the property. LATITUDE 42 will widely publish a quality of life complaint hotline that will be linked to the facility. If any residents see people engaged in illegal marijuana use in public in the area, they can call not only the Waltham Police but our hotline as well. LATITUDE 42 will make efforts to determine if the problem activity is being conducted by a client. If LATITUDE 42 becomes aware that someone has violated the terms of the good neighbor policy, such as by consuming the product in public, LATITUDE 42 will immediately trespass that individual and will list them as no longer being able to enter the LATITUDE 42 facility. LATITUDE 42 intends to coordinate with the Waltham Police Department to hire Waltham police officers on a detail / reimbursable overtime basis as needed.

Kroll's Operational Safety Program for Latitude 42

Kroll will ensure that the facility will exceed the State's standards for access control and cameras. There will be no queue line on the street. We have designed an internal area for customers to wait to get verified as eligible to enter the dispensary. LATITUDE 42 personnel will verify proof of age as an individual enters the facility. Upon entry the client will proceed to the security window where their ID will be scanned and checked again. LATITUDE 42 staff will also ensure the person has not previously been prohibited from entry for violation of our good neighbor agreement. Once a person is verified, they will be buzzed through the security door into the sales area. Upon selecting, the client will proceed to the check out where there will be a third verification of the person's ID. LATITUDE 42 staff will ensure that there is no loitering on the premises or surrounding area.

All finished marijuana products will be stored in a secure, locked safe or vault in such a manner as to

prevent diversion, theft, and loss; LATITUDE 42 will keep all safes, vaults, and any other equipment or areas used for the production and / or storage of marijuana products securely locked and protected from entry, except for the actual time required to remove or replace marijuana.

LATITUDE 42 will ensure all locks and security equipment are in good working order and will prohibit keys, if any, from being left in the locks or stored or placed in a location accessible to persons other than specifically authorized personnel. LATITUDE 42 will limit access to combination numbers, passwords or electronic or biometric security systems to specifically authorized personnel.

Kroll will ensure that the outside perimeter of the Marijuana Establishment is sufficiently lit to facilitate surveillance, where applicable. In addition, all marijuana products will be kept out of plain sight and not visible from a public place without the use of binoculars, optical aids or aircraft. LATITUDE 42 will develop emergency policies and procedures for securing all product following any instance of diversion, theft, or loss, of marijuana and conduct an assessment to determine whether additional safeguards are necessary.

LATITUDE 42 will share the Marijuana Establishment's security plan and procedures with Waltham Police and Fire Departments and will periodically update them as needed if the plans or procedures are modified in a material way.

Cash Management Program

LATITUDE 42 will engage with a professional armored vehicle service to pick up cash from the facility as needed as well as utilizing cashless ATM's and other financial APPs to limit and manage the cash on premises.

Security Related Policies

The Company will develop security-related policies and procedures in a written security manual. At minimum, the manual will include the development of the following policies:

- I. Marijuana Product Security
 - A. Safes and Vaults
 - B. Security Personnel
 - C. Security Signage
 - D. Video Image Protection and Retention
 - E. Exterior Perimeter Lighting
 - F. Inventory and Disposal
 - G. Physical and Electronic Security Maintenance

- II. Access Control in accordance with
 - A. Key and Access Code Control
 - B. Dispensary Facility Access
 - C. Client Access
 - D. Staff Only Areas (e.g., Break Room, Safe Room, Receiving area)
 - E. Security Officer Access (e.g., Security Room)
- III. Visitor Management
 - A. Definition of Authorized Visitor
 - B. Notification of Visitors in Advance
 - C. Visitor Identification Badge (creation, display, and return)
 - D. Visitor Log
 - E. Emergency Visitation Circumstance
- IV. Diversion, Theft, and Loss
 - A. Inventory (security aspects)
 - B. Identification
 - C. Reporting/Notification
 - D. Root Cause Analysis
 - E. Disposal of Marijuana
- V. Alarm Activation, Security Breach and System Failure
 - A. Identification
 - B. Reporting/Notification
 - C. Root Cause Analysis

The Company will develop policies to include the following security policies for a holistic approach to dispensary facility security:

- 1. Workplace Violence
 - a. Definitions and Typologies
 - b. Management's Role and Responsibilities
 - c. Assessment
 - d. Response to Current Violence
 - e. Response to Threats
 - f. Investigation
- 2. Trespassing and Loitering
 - a. 94 C Statutes
 - b. Public Notification
 - c. Response Protocols

3. Weapons
 - a. Company Prohibitions
 - b. Signage
4. Bomb Threat
 - a. Bomb Threat Checklist
 - b. Evacuation Procedures
 - c. Search Procedures
 - d. Response Protocols
5. Sensitive Information Protection
 - a. Management's Role and Responsibilities
 - b. Sensitive Information Defined
 - c. Safeguarding Sensitive Information (e.g., Protected Health Information Credit Card)
 - d. Document Destruction
 - e. Clean Desk Policy
6. Staff Security Awareness
 - a. Management's Role and Responsibilities
 - b. New Employee Security Orientation
 - i. How staff contact security
 - ii. What information staff should report to security
 - iii. The importance of displaying and checking identification
 - iv. Procedures for preventing and responding to security breaches
 - v. Preventing, intervening, reporting and resolving workplace violence issues
 - vi. Staff role in crime prevention
 - vii. Reporting environmental safety and security issues
 - viii. Personal safety awareness
 - ix. Confidential information and privacy issues
 - x. On-Going Security Awareness Efforts
 - xi. Security Policies
 - xii. Security Responsibilities
7. Robbery Prevention and Response
 - a. Use of Duress Alarms
 - b. Compliance with Robber Demands
 - c. Video Surveillance

- d. Employee Training
- 8. Cash Handling
 - a. Acceptance of cash from clients
 - b. Cash Storage
 - c. Payments with cash
- 9. End of Day Checklist
 - a. Secure All Protected Health Information (PHI) Storage Areas
 - b. Secure Cash, Checks, and Credit Card Slip Storage Areas (i.e., Safe, cash boxes, etc.) or Transfer to Financial Institution
 - c. Secure All Marijuana Storage Areas
 - d. Secure All Interior Doors
 - e. Inspect Restrooms for Unauthorized Persons

VI. Security Personnel

Although not specifically required in the regulations, the LATITUDE 42 dispensary facility will have at least one contracted security officer on-site during all hours that staff is on the premises. The Security Officer will be responsible for managing access, patrolling the dispensary facility, and verifying compliance with LATITUDE 42 security policies. LATITUDE 42 will develop written security post orders for Security Officers assigned to the dispensary facility. Post Orders are an essential document for Security Officers that provide guidance on expectations and instructions on performing security duties for each shift and each post.

The Post Orders establish:

- Role in Client Access
- Patrol Requirements (frequency, locations, etc.)
- Alarm Priorities and Response Requirements
- Duress/Panic/Hold-up Alarms
- Unauthorized Access
- Intrusion Alarms
- Failure Notification System
- Door/Lock Inspections
- Documentation (Daily Activity Reports and Incident Reports)
- End-of-Day Inspections
- The Security Officer will be armed and equipped with a radio, flashlight, and cold weather gear.

LATITUDE 42 will provide training to include Security Policies, dispensary facility characterization, security post orders, systems training

Crisis Intervention
Security Risk Management
Effective Communications
Security Awareness
Use of Force
Alarm System Fundamentals
Defensive Tactics and Officer Safety

VII. Product Delivery

The Company will only accept deliveries from vendors at pre-arranged days and times and only when a proper shipping manifest has been sent to LATITUDE 42 at least 24 hours before the delivery.

VIII. Incident Reporting.

LATITUDE 42 shall notify appropriate law enforcement authorities and the Cannabis Control Commission of any breach of security immediately or, at most, within 24 hours following discovery of the breach. Notification shall occur during, but not be limited to, the following occasions:

Discovery of discrepancies identified during inventory.

Diversion, theft or loss of any marijuana product.

Any criminal action involving or occurring on or in the Marijuana Establishment premises.

Any suspicious act involving the sale, cultivation, distribution, processing, or production of marijuana by any person.

Unauthorized destruction of marijuana.

Any loss or unauthorized alteration of records related to marijuana.

Any alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the Marijuana Establishment.

The failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours; or

Any other breach of security.

LATITUDE 42 shall, within ten calendar days, provide notice to the Cannabis Control Commission of any incident described in 935 CMR 500.110(7)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified. All

documentation related to an incident that is reportable pursuant to 935 CMR500.110(7)(a) shall be maintained by LATITUDE 42 for not less than one year or the duration of an open investigation, whichever is longer, and made available to the Cannabis Control Commission and law enforcement authorities upon request.

IX. Security Audits

LATITUDE 42 will, on an annual basis, obtain at its own expense a security system audit by a vendor approved by the Commission. A report of such audit will be submitted, in a form and manner determined by the Commission, no later than 30 calendar days after the audit is conducted. If the audit identifies concerns related to the establishment's security system, LATITUDE 42 will submit a mitigation plan within ten business days of submitting the audit.

X. Packaging of Edible Marijuana Products

Any edible marijuana product that is made to resemble a typical food or beverage product will be packaged and labeled as required by M.G.L. c. 94G, § 4(a½) (xxvi) and 935 CMR 500.105(5). LATITUDE 42 will not offer for sale edibles in the distinct shape of a human, animal, or fruit, or a shape that bears the likeness or contains characteristics of a realistic or fictional human, animal, or fruit, including artistic, caricature, or cartoon renderings. LATITUDE 42 will ensure all edible marijuana products are prepared, handled, and stored in compliance with the requirements in 935 CMR 500.105(3) and 500.105(11).

Per 935 CMR 500.150(3), in addition to the requirements set forth in M.G.L. c. 94G, § 4(a½)(xxvi) and 935 CMR 500.105(5) and (6), LATITUDE 42 will ensure that the following information or statement is affixed to every container holding an edible marijuana product: If the retail edible marijuana product is perishable, a statement that the edible marijuana product must be refrigerated. The date on which the edible marijuana product was produced. A nutritional fact panel that must be based on the number of THC servings within the container. Information regarding the size of each serving for the product by milligrams, the total number of servings of marijuana in the product, and the total amount of active THC in the product by milligrams (mgs). For example: "The serving size of active THC in this product is X mg(s), this product contains X servings of marijuana, and the total amount of active THC in this product is X mg(s)."

A warning that the impairment effects of edible marijuana may be delayed by two hours or more. LATITUDE 42 will ensure that each single serving of an edible marijuana product is physically demarked in a way that enables a reasonable person to intuitively determine how much of the product constitutes a single serving of active THC. Each serving of an edible marijuana product within a multi-serving package of edible marijuana products will be easily separable in order to allow an average person 21 years of age or older to physically separate, with minimal effort,

individual servings of the product. Each single serving of an edible marijuana product contained in a packaged unit of multiple edible marijuana product shall be marked, stamped, or otherwise imprinted with a symbol or easily recognizable mark issued by the Cannabis Control Commission that indicates the package contains marijuana product.

LATITUDE 42 will not deliver, sell, or otherwise transfer an edible marijuana product with potency levels exceeding the following, as tested by an independent marijuana testing facility licensed in accordance with M.G.L. c. 94G, § 15: for a single serving of an edible marijuana product, five milligrams of active tetrahydrocannabinol (THC); and in a single package of multiple edible marijuana product to be eaten, swallowed, or otherwise ingested, not more than 20 servings or 100 milligrams of active THC. The THC content will be homogenous, or evenly distributed, throughout the edible marijuana product.

LATITUDE 42 will ensure that all products are marked with an easily recognizable mark issued by the Cannabis Control Commission that indicates that the product is harmful to children. In instances where the labeling of the marijuana product is unreasonable or impractical, LATITUDE 42 will include the labeling information on a peel back label or may place the product in a sealed bag with an insert or additional, easily readable label firmly affixed to that bag. LATITUDE 42 will employ tamper or opaque or plain child-resistant packaging as approved by the US Consumer Product Safety Commission per their most recent poison prevention packaging regulations.

LATITUDE 42 will ensure compliance with 935 CMR 500.105 by not utilizing packaging methods below:

1. Using bright colors, defined as colors that are “neon” in appearance.
2. Imitating or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain marijuana.
3. Featuring cartoons.
4. Featuring a design, brand, or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors.
5. Featuring symbols or celebrities that are commonly used to market products to minors.
6. Featuring images of minors; or
7. Featuring words that refer to products that are commonly associated with minors or marketed to minors.

LATITUDE 42 will utilize a Cannabis Control Commission approved seed to sale tracking program to track all product coming into and out of the facility.