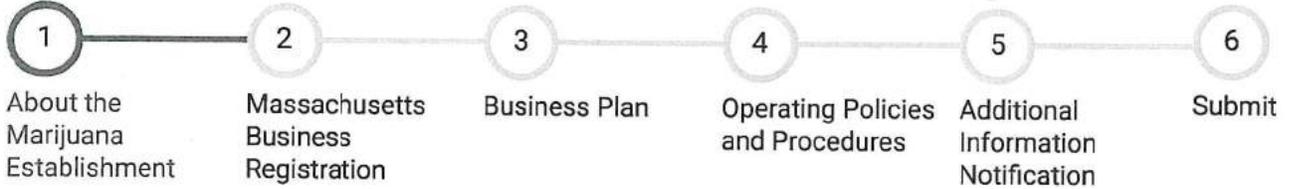


EAST COAST
REMEDIES

**MANAGEMENT AND OPERATIONS
PROFILE PACKET FOR MARIJUANA
RETAILER APPLICATION**



Cannabis Control Commission > My Licenses > Marijuana Retailer



Application #: MRN282565

About the Marijuana Establishment

Please provide information on the Marijuana Establishment below. All fields marked with an * are required.

Business Legal Name *

Federal Tax Identification Number EIN/TIN *

Phone Number *

Email Address *

Business Address 1 *

Business Address 2

Business City *

Business State *

Business Zip Code *

Mailing Address 1 *

Mailing Address 2

Mailing City *

Mailing State *

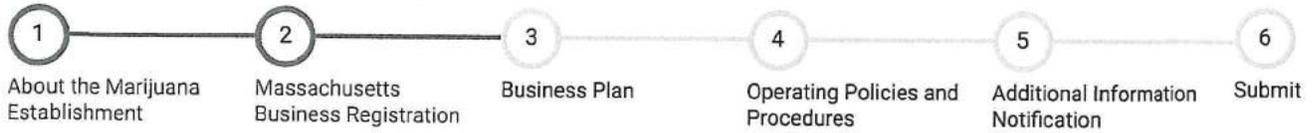
Mailing Zip Code *

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Exit

Cannabis Control Commission > My Licenses > Marijuana Retailer



Application #: MRN282565

Massachusetts Business Registration

A Marijuana Establishment must:

- *Be registered to do business in the Commonwealth of Massachusetts as a domestic business corporation or another domestic business entity*
- *Maintain the corporation in good standing with the Secretary of the Commonwealth of Massachusetts*
- *Maintain the corporation in good standing with the Massachusetts Department of Revenue*

If you do not know the Massachusetts Business Identification Number for the Marijuana Establishment, you can look it up on this website:

<https://corp.sec.state.ma.us/corpweb/CorpSearch/CorpSearch.aspx>

Massachusetts Business Identification Number *

001372790

Doing-Business-As Name

If applicable, the business name registered with a local city or town

DBA Registration City

The Massachusetts city or town in which the DBA is registered.

Required Business Documentation *

Please upload and categorize each of these four required documents:

- *Certificate of Good Standing from the Secretary of the Commonwealth of Massachusetts*
- *Certificate of Good Standing from the Massachusetts Department of Revenue*
- *Articles of Organization*
- *Bylaws*

	Document Name: East Coast Remedies - Cert. of Good Standing (DoR).pdf	
	Document Category: Department of Revenue - Certificate of Good standing	
	Upload Date: 4/3/19	
	Document Name: East Coast Remedies - Cert. of Good Standing (SoC).pdf	
	Document Category: Secretary of Commonwealth - Certificate of Good Standing	
	Upload Date: 4/3/19	



Document Name: East Coast Remedies - Articles of Organization.pdf



Document Category: Articles of Organization

Upload Date: 4/3/19



Document Name: East Coast Remedies - Corporate Bylaws_DRAFT.pdf



Document Category: Bylaws

Upload Date: 4/3/19

Drag document(s) or click here

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Save & Stay On This Page

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Exit

For assistance please call the Cannabis Control Commission at 617-701-8400 or email at cannabiscommission@state.ma.us

**CERTIFICATE OF GOOD STANDING –
DEPARTMENT OF REVENUE**



Commonwealth of Massachusetts
Department of Revenue
Christopher C. Harding, Commissioner

mass.gov/dor

Letter ID: L0166514048
Notice Date: March 18, 2019
Case ID: 0-000-531-390



CERTIFICATE OF GOOD STANDING AND/OR TAX COMPLIANCE



EAST COAST REMEDIES CORP
116 CLARK AVE
CHELSEA MA 02150-2136



Why did I receive this notice?

The Commissioner of Revenue certifies that, as of the date of this certificate, EAST COAST REMEDIES CORP is in compliance with its tax obligations under Chapter 62C of the Massachusetts General Laws.

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

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

What if I have questions?

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

Visit us online!

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

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

Edward W. Coyle, Jr., Chief
Collections Bureau

**CERTIFICATE OF GOOD STANDING –
SECRETARY OF THE COMMONWEALTH**



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

William Francis Galvin
Secretary of the
Commonwealth

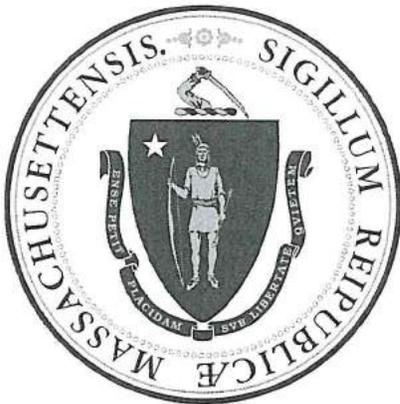
Date: March 27, 2019

To Whom It May Concern :

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

EAST COAST REMEDIES CORP.

is a domestic corporation organized on **March 13, 2019** , under the General Laws of the Commonwealth of Massachusetts. I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 156D section 14.21 for said corporation's dissolution; that articles of dissolution have not been filed by said corporation; that, said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.



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

William Francis Galvin

Secretary of the Commonwealth

Certificate Number: 19030535680

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

Processed by:

ARTICLES OF ORGANIZATION



The Commonwealth of Massachusetts
William Francis Galvin

Minimum Fee: \$250.00

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

Articles of Organization

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

Identification Number: 001372790

ARTICLE I

The exact name of the corporation is:

EAST COAST REMEDIES CORP.

ARTICLE II

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

ARTICLE III

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

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

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

ARTICLE IV

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

ARTICLE V

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

A. LIMITATION OF DIRECTOR LIABILITY. EXCEPT AS REQUIRED BY APPLICABLE LAW, NO DIRECTOR OF THE CORPORATION SHALL HAVE ANY PERSONAL LIABILITY TO THE CORPORATION OR ITS STOCKHOLDERS FOR MONETARY DAMAGES FOR BREACH OF FIDUCIARY DUTY AS A DIRECTOR. THE PRECEDING SENTENCE SHALL NOT ELIMINATE OR LIMIT THE LIABILITY OF A DIRECTOR FOR ANY ACT OR OMISSION OCCURRING PRIOR TO THE DATE UPON WHICH SUCH PROVISION BECOMES EFFECTIVE. B. INDEMNIFICATION. THE CORPORATION SHALL, TO THE EXTENT PERMITTED BY G.L.C. 156D, INDEMNIFY ALL PERSONS WHO HAVE SERVED OR MAY SERVE AT ANY TIME AS OFFICERS OR DIRECTORS OF THE CORPORATION AND THEIR HEIRS, EXECUTORS, ADMINISTRATORS, SUCCESSORS, AND ASSIGNS, FROM AND AGAINST ANY AND ALL LOSS AND EXPENSE, INCLUDING AMOUNTS PAID IN SETTLEMENT BEFORE OR AFTER SUIT IS COMMENCED, AND REASONABLE ATTORNEY'S FEES, ACTUALLY AND NECESSARILY INCURRED AS A RESULT OF ANY CLAIM, DEMAND, ACTION, PROCEEDING, OR JUDGMENT THAT MAY HAVE BEEN ASSERTED AGAINST ANY SUCH PERSONS, OR IN WHICH THESE PERSONS ARE MADE PARTIES BY REASON OF THEIR BEING OR HAVING BEEN OFFICERS OR DIRECTORS OF THE CORPORATION. THIS RIGHT OF INDEMNIFICATION SHALL NOT EXIST IN RELATION TO MATTERS AS TO WHICH IT IS ADJUDGED IN ANY ACTION, SUIT OR PROCEEDING THAT THESE PERSONS ARE LIABLE FOR NEGLIGENCE OR MISCONDUCT IN THE PERFORMANCE OF DUTY. THE INDEMNIFICATION RIGHTS PROVIDED HEREIN (I) SHALL NOT BE DEEMED EXCLUSIVE OF ANY OTHER RIGHTS TO WHICH THOSE INDEMNIFIED MAY BE ENTITLED UNDER ANY LAW, AGREEMENT, VOTE OF SHAREHOLDERS OR OTHERWISE; AND (II) SHALL INURE TO THE BENEFIT OF THE HEIRS, EXECUTORS AND ADMINISTRATORS OF SUCH PERSONS ENTITLED TO INDEMNIFICATION. THE CORPORATION MAY, TO THE EXTENT AUTHORIZED FROM TIME TO TIME BY THE BOARD OF DIRECTORS, GRANT INDEMNIFICATION RIGHTS TO OTHER EMPLOYEES OR AGENTS OF THE CORPORATION OR OTHER PERSONS SERVING THE CORPORATION AND SUCH RIGHTS MAY BE EQUIVALENT TO, OR GREATER OR LESS THAN, THOSE SET FORTH HEREIN. C. PARTNERSHIP. THE CORPORATION MAY BE A PARTNER TO THE MAXIMUM EXTENT PERMITTED BY LAW. D. MINIMUM NUMBER OF DIRECTORS. THE BOARD OF DIRECTORS MAY CONSIST OF ONE OR MORE INDIVIDUALS, NOTWITHSTANDING THE NUMBER OF SHAREHOLDERS. E. SHAREHOLDER ACTION WITHOUT A MEETING BY LESS THAN UNANIMOUS CONSENT. ACTION REQUIRED OR PERMITTED BY CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS TO BE TAKEN AT A SHAREHOLDERS' MEETING MAY BE TAKEN WITHOUT A MEETING BY SHAREHOLDERS HAVING NOT LESS THAN THE MINIMUM NUMBER OF VOTES NECESSARY TO TAKE THE ACTION AT A MEETING AT WHICH ALL SHAREHOLDERS ENTITLED TO VOTE ON THE ACTION ARE PRESENT AND VOTING. F. AUTHORIZATION OF DIRECTORS TO MAKE, AMEND OR REPEAL BYLAWS. THE BOARD OF DIRECTORS MAY MAKE, AMEND OR REPEAL THE BYLAWS IN WHOLE OR IN PART, EXCEPT WITH RESPECT TO ANY PROVISION THEREOF WHICH BY VIRTUE OF AN EXPRESS PROVISION IN CHAPTER 156D OF THE GENERAL LAWS OF MASSACHUSETTS, THE ARTICLES OF ORGANIZATION OR THE BYLAWS REQUIRES ACTION BY THE SHAREHOLDERS.

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

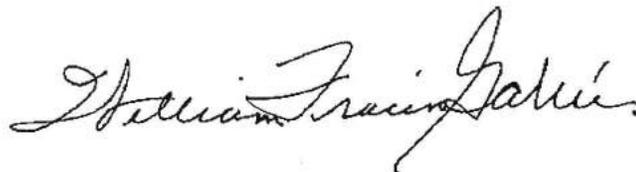
ARTICLE VII

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

THE COMMONWEALTH OF MASSACHUSETTS

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

March 13, 2019 03:45 PM

A handwritten signature in cursive script that reads "William Francis Galvin". The signature is written in black ink and is centered on the page.

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

CORPORATE BYLAWS

PRIVILEGED & CONFIDENTIAL

**BYLAWS
OF
EAST COAST REMEDIES CORP.**

BYLAWS OF EAST COAST REMEDIES CORP.

ARTICLE I: GENERAL

Section 1.01 Name and Purposes. The name of the Corporation is **EAST COAST REMEDIES CORP.** (the “**Corporation**”). The purpose of the Corporation shall be as set forth in the Corporation’s Articles of Organization as adopted and filed with the Office of the Secretary of State of the Commonwealth of Massachusetts (as now in effect or as hereafter amended or restated from time to time, the “**Articles of Organization**”) pursuant to Chapter 156D of the Massachusetts General Laws, as now in effect and as hereafter amended, or the corresponding provision(s) of any future Massachusetts General Law (“**Chapter 156D**”).

Section 1.02 Articles of Organization. These Bylaws (“**Bylaws**”), the powers of the Corporation and its shareholders and Board of Directors, and all matters concerning the conduct and regulation of the business of the Corporation, shall be subject to the provisions in regard thereto that may be set forth in the Articles of Organization. In the event of any conflict or inconsistency between the Articles of Organization and these Bylaws, the Articles of Organization shall control.

Section 1.03 Corporate Seal. The Board of Directors may adopt and alter the seal of the Corporation. The seal of the Corporation, if any, shall, subject to alteration by the Board of Directors, bear its name, the word “Massachusetts” and the year of its incorporation.

Section 1.04 Fiscal Year. The fiscal year of the Corporation shall commence on January 1, and end on the following December 31 of each year, unless otherwise determined by the Board of Directors.

Section 1.05 Location of Principal Office of the Corporation. The principal office of the Corporation shall be located at such place within the Commonwealth of Massachusetts as shall be fixed from time to time by the Board of Directors, and if no place is fixed by the Board of Directors, such place as shall be fixed by the President.

ARTICLE II: SHAREHOLDERS

Section 2.01 Place of Meeting. Meetings of the shareholders shall be held at any place within or without the Commonwealth of Massachusetts that may be designated by the Board of Directors. Absent such designation, meetings shall be held at the principal office. The Board of Directors may, in its discretion, determine that the meeting may be held solely by means of remote electronic communication. If authorized by the Board of Directors, and subject to any guidelines and procedures adopted by the Board of Directors, shareholders not physically present at a meeting of shareholders, may participate in a meeting of shareholders by means of electronic transmission by and to the Corporation or electronic video screen communication; and, may be considered present in person and may vote at a meeting of shareholders, whether held at a designated place or held solely by means of electronic transmission by and to the Corporation or electronic video screen communication, subject to the conditions imposed by applicable law.

Section 2.02 Annual Meeting. The annual meeting of shareholders of this Corporation shall be held on such date and at such time as may be designated from time to time by the Board

of Directors. At the annual meeting, Directors shall be elected, and any other business may be transacted that is within the power of the shareholders and allowed by law; *provided, however*, that unless the notice of meeting, or the waiver of notice of such meeting, sets forth the general nature of any proposal to (i) approve or ratify a contract or transaction with a Director or with a corporation, firm or association in which a Director has an interest; (ii) amend the Articles of Organization of this Corporation; (iii) approve a reorganization or merger involving this Corporation; (iv) elect to wind up and dissolve this Corporation; or (v) effect a plan of distribution upon liquidation otherwise than in accordance with the liquidation preferences of outstanding shares with liquidation preferences, no such proposal may be approved at an annual meeting.

Section 2.03 Special Shareholders' Meetings. Special meetings of the shareholders, for any purpose whatsoever, may be called at any time by the President, the Board of Directors or by shareholders entitled to cast not less than ten percent (10%) of the corporation's voting power. Any person entitled to call a special meeting of shareholders (other than the Board of Directors) may make a written request to the Chair of the Board (if any), President, Vice President (if any) or Secretary, specifying the general purpose of such meeting and the date, time and place of the meeting, which date shall be not less than fifteen (15) days nor more than sixty (60) days after the receipt by such officer of the request. Within twenty (20) days after receipt of the request, the officer receiving such request forthwith shall cause notice to be given to the shareholders entitled to vote at such meeting, stating that a meeting will be held on the date and at the time and place requested by the person or persons requesting a meeting and stating the general purpose of the meeting. If such notice is not given twenty (20) days after receipt by the officer of the request, the person or persons requesting the meeting may give such notice. No business shall be transacted at a special meeting unless its general nature shall have been specified in the notice of such meeting; *provided, however*, that any business may be validly transacted if the requirements for such validity, as provided in Section 2.12 of these Bylaws, are met.

Section 2.04 Shareholder Nominations and Proposals. For business (including, but not limited to Director nominations) to be properly brought before an annual or special meeting by a shareholder, the shareholder or shareholders of record intending to propose the business (the "**Proposing Shareholder**") must have given written notice of the Proposing Shareholder's nomination or proposal, either by personal delivery or by the United States mail to the Secretary of the Corporation. In the case of an annual meeting, the Proposing Shareholder must give such notice to the Secretary of the Corporation no earlier than one hundred and twenty (120) calendar days and no later than ninety (90) calendar days before the date such annual meeting is to be held. If the current year's meeting is called for a date that is not within thirty (30) days of the anniversary of the previous year's annual meeting, notice must be received not later than ten (10) calendar days following the day on which public announcement of the date of the annual meeting is first made. In no event will an adjournment or postponement of an annual meeting of shareholders begin a new time period for giving a Proposing Shareholder's notice as provided above.

For business to be properly brought before a special meeting of shareholders, the notice of meeting sent by or at the direction of the person calling the meeting must set forth the nature of the business to be considered. A shareholder or shareholders who have made a written request for a special meeting pursuant to Section 2.03 of these Bylaws may provide the information required for notice of a shareholder proposal under this Section 2.04 simultaneously with the written request for the

meeting submitted to the Secretary or within ten (10) calendar days after delivery of the written request for the meeting to the Secretary.

A Proposing Shareholder's notice shall include as to each matter the Proposing Shareholder proposes to bring before either an annual or special meeting:

- (a) The name(s) and address(es) of the Proposing Shareholder(s).
- (b) The classes and number of shares of capital stock of the Corporation held by the Proposing Shareholder.
- (c) If the notice regards the nomination of a candidate for election as Director:
 - (i) The name, age, business and residence address of the candidate;
 - (ii) The principal occupation or employment of the candidate; and
 - (iii) The class and number of shares of the Corporation beneficially owned by the candidate.
- (d) If the notice is in regard to a proposal other than a nomination of a candidate for election as Director, a brief description of the business desired to be brought before the meeting and the material interest of the Proposing Shareholder of such proposal.

Section 2.05 Notice of Shareholders' Meeting. Except as otherwise provided by law, written notice stating the place, day and hour of the meeting, and, in case of a special meeting, the nature of the business to be transacted at the meeting, shall be given at least ten (10) days and not more than sixty (60) days before the meeting. In the case of an annual meeting, notice will include matters the Corporation's Board of Directors intends, at the time of the giving of the first of such notices, to present to the shareholders for action, and in the case of a meeting at which Directors are to be elected, the names of nominees that the Board of Directors, at the time of the giving of the first of such notices, intends to present to the shareholders for election. Proof that notice was given shall be made by affidavit of the Secretary, assistant Secretary, transfer agent or Director, or of the person acting under the direction of any of the foregoing, who gives such notice, and such proof of notice shall be made part of the minutes of the meeting. Such affidavit shall be prima facie evidence of the giving of such notice. It shall not be necessary to state in a notice of any meeting of shareholders as a purpose thereof any matter relating to the procedural aspects of the conduct of such meeting.

Notice shall be given personally, by electronic transmission or by mail, by or at the direction of the Secretary, or the officer or person calling the meeting, to each shareholder entitled to vote at the meeting. If remote participation in the meeting has been authorized by the Board of Directors, the notice shall also provide a description of the means of any electronic transmission by and to the Corporation or electronic video screen communication by which shareholders may be considered present and may vote and otherwise participate at the meeting.

If mailed, the notice shall be deemed to be given when deposited in the United States mail addressed to the shareholder at the shareholder's address as it appears on the share transfer records

of the Corporation, with postage thereon prepaid. Notice may be given to the shareholder by electronic transmission. Notice by electronic transmission is deemed given when the notice satisfies any of the following requirements:

- (a) Transmitted to a facsimile number provided by the shareholder for the purpose of receiving notice.
- (b) Transmitted to an electronic mail address provided by the shareholder for the purpose of receiving notice.
- (c) Posted on an electronic network, with a separate notice sent to the shareholder at the address provided by the shareholder for the purpose of alerting the shareholder of a posting.
- (d) Communicated to the shareholder by any other form of electronic transmission consented to by the shareholder.

Notice shall not be given by electronic transmission to a shareholder after either (i) the Corporation is unable to deliver two (2) consecutive notices to such shareholder by such means or (ii) the inability to deliver such notices to such shareholder becomes known to any person responsible for giving such notices. Any person entitled to notice of a meeting may file a written waiver of notice with the Secretary either before or after the time of the meeting. The participation or attendance at a meeting of a person entitled to notice constitutes waiver of notice, except where the person objects, at the beginning of the meeting, to the lawfulness of the convening of the meeting and except that attendance is not a waiver of any right to object to conducting business at a meeting that is required to be included in the notice of the meeting, but not so included.

Section 2.06 *Reserved*

Section 2.07 Fixing the Record Date. For the purpose of determining shareholders entitled to notice of or to vote at any meeting of shareholders or any adjournment thereof, the record date shall be the date specified by the Board of Directors in the notice of the meeting. If no date is specified by the Board of Directors, the record date shall be the close of business on the day before the notice of the meeting is mailed to shareholders. If no notice is sent, the record date shall be the date set by the law applying to the type of action to be taken for which a record date must be set.

In the case of action by written consent of the shareholders without a meeting, the record date shall be (a) the date fixed by the board of directors or (b) the date that the first shareholder signs the written consent if no date has been fixed by the board.

A record date fixed under this Section may not be more than seventy (70) days before the meeting or action requiring a determination of shareholders. A determination of shareholders entitled to notice of or to vote at a shareholders' meeting is effective for any adjournment of the meeting unless the Board of Directors fixes a new record date.

Section 2.08 Quorum of and Action by Shareholders. A quorum shall be present for action on any matter at a shareholder meeting if a majority of the votes entitled to be cast on the

matter by a voting group is represented at the meeting in person or by proxy. A voting group includes all shares of one (1) or more classes or series that are entitled, by law or the Articles of Organization, to vote and to be counted together collectively on a matter at a meeting of shareholders.

Once a quorum for a voting group has been established at a meeting, the shareholders in that voting group represented in person or by proxy at the meeting are deemed present for quorum purposes for the remainder of the meeting and for any adjournment unless:

- a. The shareholder attends the meeting solely to object to defective notice or the conduct of the meeting on other grounds and does not vote the shares or take any other action at the meeting.
- b. The meeting is adjourned and a new record date is set for the adjourned meeting.

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

Section 2.09 *Reserved*

Section 2.10 Conduct of Meetings. The Board of Directors may adopt by resolution rules and regulations for the conduct of meetings of the shareholders as it shall deem appropriate. At every meeting of the shareholders, the President, or in his or her absence or inability to act, a Director or officer designated by the Board of Directors, shall serve as the presiding officer. The Secretary or, in his or her absence or inability to act, the person whom the presiding officer of the meeting shall appoint secretary of the meeting, shall act as secretary of the meeting and keep the minutes thereof.

The presiding officer shall determine the order of business and, in the absence of a rule adopted by the Board of Directors, shall establish rules for the conduct of the meeting. The presiding officer shall announce the close of the polls for each matter voted upon at the meeting, after which no ballots, proxies, votes, changes or revocations will be accepted. Polls for all matters before the meeting will be deemed to be closed upon final adjournment of the meeting.

Section 2.11 Voting of Shares. Unless otherwise provided by law or in the Articles of Organization, each shareholder entitled to vote is entitled to one (1) vote for each share of common stock. Any holder of shares entitled to vote on any matter may vote part of such shares in favor of the proposal and refrain from voting the remaining shares or vote them against the proposal. If a shareholder fails to specify the number of shares such shareholder is voting affirmatively, it will be conclusively presumed that the shareholder's approving vote is with respect to all shares such shareholder is entitled to vote.

Section 2.12 Consent of Absentees. The transactions of any meeting of shareholders, however called or noticed, are as valid as though had at a meeting duly held after regular call and notice, if a quorum is present either in person or by proxy, and if, either before or after the meeting, each of the persons entitled to vote, not present in person or by proxy, signs a written waiver of notice, or a consent to the holding of such meeting, or an approval of the minutes thereof. The waiver notice, or consent need not specify the business transacted or purpose of the meeting, except as required by Chapter 156D. All such waivers, consents or approvals shall be filed with the corporate records or made a part of the minutes of the meeting.

Section 2.13 Voting by Proxy or Nominee. Every person entitled to vote or execute consents may do so either in person or by one (1) or more agents authorized by a written proxy executed by the person or such person's duly authorized agent and filed with the Secretary of the Corporation. A proxy is not valid after the expiration of eleven (11) months from the date of its execution, unless the person executing it specifies therein the length of time for which it is to continue in force. Except as set forth below, any proxy duly executed is not revoked, and continues in full force and effect, until an instrument revoking it, or a duly executed proxy bearing a later date, executed by the person executing the prior proxy and presented to the meeting, is filed with the Secretary of the Corporation, or unless the person giving the proxy attends the meeting and votes in person, or unless written notice of the death or incapacity of the person executing the proxy is received by the Corporation before the vote by such proxy is counted. A proxy that states on its face that it is irrevocable will be irrevocable for the period of time specified in the proxy, if held by a person (or nominee of a person) specified by law to have sufficient interest to make such proxy irrevocable and only so long as he shall have such interest, subject to Chapter 156D, § 7.22.

Section 2.14 Action by Shareholders Without a Meeting. Any action, that, under any provision of Chapter 156D may be taken at a meeting of the shareholders, may be taken without a meeting and without prior notice if a consent in writing, setting forth the action so taken, shall be signed by the holders of the outstanding shares having not less than the minimum number of votes that would be necessary to authorize or take such action at a meeting at which all shares are entitled to vote thereon were present and voted; *provided, however*, that unless the consents of all shareholders entitled to vote have been solicited in writing, notice shall be given (in the same manner as notice of meetings is to be given), and within the time limits prescribed by law, of such action to all shareholders entitled to vote who did not consent in writing to such action; and *provided, further*, that Directors may be elected by written consent only if such consent is unanimously given by all shareholders entitled to vote, except that action taken by shareholders to fill one (1) or more vacancies on the Board other than a vacancy created by the removal of a Director, may be taken by written consent of a majority of the outstanding shares entitled to vote.

Section 2.15 Automatic Divestiture. If, during anytime while the Corporation holds a local or state marijuana business license, any of the following occur to a shareholder or to a member of an entity that is a shareholder of the Corporation, all interests of that shareholder in the Corporation (the "Affected Shareholder") will automatically and immediately terminate, and the Affected Shareholder will cease to be a shareholder:

- (a) The Affected Shareholder is charged with or convicted of any criminal offense, if a conviction of the offense in question would, pursuant to the applicable laws and regulations, disqualify the Affected Shareholder from having an ownership interest in

a marijuana business; *however*, where an Affected Shareholder is only charged with a criminal offense and not convicted, and where the applicable cannabis regulatory body and any other local or state licensing authority upon request have agreed to defer pursuing any action against the Corporation's marijuana business license(s) based upon such charges, or where any such actions of the applicable cannabis regulatory body and local licensing authorities are subject to a stay order, then the Affected Shareholder's shares shall not be subject to divestiture under this Section 2.15;

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

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

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

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

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

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

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

Section 2.16 Redemption of Shares Following Automatic Divestiture.

(a) The Corporation shall continue in existence notwithstanding the automatic termination of any Affected Shareholder pursuant to Section 2.15 above. Notwithstanding any provision of this Agreement to the contrary, if the Affected Shareholder is a corporate entity and the occurrence of any of the events enumerated in Section 2.15, above, is due to a member, shareholder, manager, director or officer of the Affected Shareholder, the Affected Shareholder shall have an option to reclaim its shares and shall be restored to its ownership position before the divestiture events occurred if the Board, a court of law or the applicable cannabis regulatory body provides a written assurance or order that Affected Shareholder has removed the member, shareholder, manager, director or officer that caused any of the events enumerated in Section 2.15, above, pursuant to the terms of the Affected Shareholder's governing documents.

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

(i) The Corporation and the Affected Shareholder shall determine the fair market value of the Affected Shareholder's shares by a mutually agreed upon third party appraisal.

(ii) If the Affected Shareholder and the Corporation cannot agree on a third-party appraisal, they shall both individually choose and pay for their own appraisal and the differences, if any, between the two valuations of the Affected Shareholder's shares shall be averaged and used for calculating the Payoff Note (as defined herein).

(iii) Once the value of the Affected Shareholder's shares is determined in relation to the Corporation's fair market value, the Corporation shall deliver a note (the "**Payoff Note**") to the Affected Shareholder for fifty percent (50%) of the asset value of Affected Shareholder's shares. The Payoff Note may be payable over a five (5) year period and may bear interest at a rate equal to the prime rate of interest as announced from time to time by the Wall Street Journal or may be discounted (using the same rate) to present value if an earlier payoff is required under the applicable laws and regulations. The terms of the Payoff Note may include equal monthly payments and shall be reasonable and customary for a transaction of this type. The Corporation may sell the Affected Shareholder's shares, in accordance with the terms of these Bylaws, to finance the Payoff Note or for any other lawful reason.

ARTICLE III: DIRECTORS

Section 3.01 Number of Directors; Identity of Initial Directors. The authorized number of Directors of the Corporation shall be one (1) until changed by an amendment to these Bylaws duly adopted in accordance with these Bylaws by the vote or written consent of a majority of the outstanding shares entitled to vote. The initial Director shall be Thomas Mourmouras.

Section 3.02 Powers. All corporate power shall be exercised by or under the authority of, and the business and affairs of the Corporation shall be managed under the direction of, the Board of Directors, except such powers expressly conferred upon or reserved to the shareholders, and subject to any limitations set forth by law, by the Articles of Organization or by these Bylaws.

Section 3.03 Term of Office. Directors shall hold office until the next annual meeting of shareholders and until their successors are elected.

Section 3.04 Vacancies and Newly Created Directorships. Vacancies and newly created directorships, whether resulting from an increase in the size of the Board of Directors, from the death, resignation, disqualification or removal of a Director or otherwise, may be filled by election at an annual or special meeting of shareholders called for that purpose or/solely by the affirmative vote of a majority of the remaining Directors then in office, even though less than a quorum of the Board of Directors. A Director elected to fill a vacancy shall be elected for the unexpired term of his or her predecessor in office.

Section 3.05 Removal. The Board of Directors may declare vacant the office of a Director who has been declared of unsound mind by an order of the court or convicted of a felony, or who has been barred from ownership of or participation in a marijuana business by a final decision of an applicable state or local licensing authority, or otherwise in a manner provided by law.

Any or all of the Directors may be removed from office at any duly called meeting without cause by a vote of the shareholders entitled to elect them. If one (1) or more Directors are so removed at a meeting of shareholders, the shareholders may elect new Directors at the same meeting.

Section 3.06 Resignation. A Director may resign effective on giving written notice to the President, unless the notice specifies a later effective date.

Section 3.07 Meetings of Directors.

(a) Regular Meetings. A regular annual meeting of the Board shall be held immediately after, and at the same place as, the annual meeting of shareholders for the purpose of electing officers and transacting any other business. The Board may provide for other regular meetings from time to time by resolution.

(b) Special Meetings. Special meetings of the Board for any purpose or purposes may be called at any time by the President, Vice President (if any), Chairman of the Board, the Secretary, by any two (2) Directors or by one (1) Director in the event that there is only one (1) Director. Notice of the time and place of special meetings shall be delivered by mail, electronic delivery or orally. If notice is mailed, it shall be deposited in the United States mail at least two (2) days before the time of the meeting. In the case the notice is delivered either orally or by electronic delivery shall be delivered at least forty-eight (48) hours before the time of the meeting. Any oral notice given personally or by telephone may be communicated either to the Director or to a person at the office of the Director whom the person giving notice has reason to believe will promptly communicate it to the Director. The notice need not specify the purpose of the meeting nor the place if it is to be held at the principal office of the Corporation.

(c) Place of Meetings. Meetings of the Board may be held at any place within or without the Commonwealth of Massachusetts that has been designated in the notice. If a place has not been stated in the notice or there is no notice, meetings shall be held at the principal office of the Corporation unless another place has been designated by a resolution duly adopted by the Board.

Section 3.08 Electronic Participation. Members of the Board may participate in a meeting through conference telephone, electronic video screen communication or other electronic transmission by and to the Corporation. Participation in a meeting by conference telephone or electronic video screen communication constitutes presence in person as long as all Directors participating can hear one another. Participation by other electronic transmission by and to the Corporation (other than conference telephone or electronic video screen communication) constitutes presence in person at the meeting as long as participating Directors can communicate with other participants concurrently, each Director has the means to participate in all matters before the Board, including the ability to propose or object to a specific corporate action, and the Corporation implements some means of verifying that each person participating is entitled to participate and all votes or other actions are taken by persons entitled to participate.

Section 3.09 Quorum of and Action by Directors. A majority of the authorized number of Directors constitutes a quorum of the Board for the transaction of business. Every act or decision done or made by a majority of the Directors present at a meeting duly held at which a quorum is present is the act of the Board of Directors, unless Chapter 156D or the Articles of Organization require a greater number. A meeting at which a quorum is initially present may continue to transact business notwithstanding the withdrawal of Directors, if any action is approved by at least a majority of the Directors who constitute the required quorum for such meeting. A quorum of the Directors may adjourn any Directors' meeting to meet again at a stated time and place. In the absence of quorum, a majority of the Directors present may adjourn from time to time. Notice of the time and place of a meeting that has been adjourned for more than twenty-four (24) hours shall be given to the Directors not present at the time of the adjournment.

Section 3.10 Compensation. Directors may receive compensation for their services, and the Board of Directors may authorize payment of a fixed fee and expenses of attendance, if any, for attendance at any meeting of the Board of Directors or committee thereof. A Director shall not be precluded from serving the Corporation in any other capacity and receiving compensation for services in that capacity. The Directors may, from time to time, establish compensation policies of the Corporation consistent with this Section 3.10.

Section 3.11 Action by Directors Without a Meeting. Any action required or permitted to be taken by the Board of Directors or any committee thereof under Chapter 156D may be taken without a meeting if, prior or subsequent to the action, a consent or consents thereto by all of the Directors in office, or all the committee members then appointed, is filed with the Secretary to be filed with the minutes of the proceedings of the Board of Directors. Such action by written consent shall have the same force and effect as a unanimous vote of such Directors.

Section 3.12 Committees of the Board of Directors. The Board of Directors, by resolution adopted by a majority of authorized Directors, may designate one (1) or more committees, each consisting of two (2) or more Directors, to serve at the pleasure of the Board and

to exercise the authority of the Board of Directors to the extent provided in the resolution establishing the committee and permitted by law. The Board of Directors may adopt governance rules for any committee consistent with these Bylaws. The provisions of these Bylaws applicable to meetings and actions of the Board of Directors shall govern meetings and actions of each committee, with the necessary changes made to substitute the committee and its members for the Board of Directors and its members.

A committee of the Board of Directors does not have the authority to:

- (a) Approve actions that require approval of the shareholders or the outstanding shares.
- (b) Fill vacancies on the Board or in any committee.
- (c) Amend or repeal bylaws or adopt new bylaws.
- (d) Amend or repeal any resolution of the Board of Directors that by its terms is not so amendable or repealable.
- (e) Make a distribution to shareholders, except at a rate, in a periodic amount or within a price range set forth in the Articles of Organization or determined by the Board.

The Board of Directors, by resolution adopted by the majority of authorized Directors, may designate one (1) or more Directors as alternate members of any committee who may replace any absent or disqualified member at any meeting of the committee or for the purposes of any written action by the committee.

The designation of a committee of the Board of Directors and the delegation thereto of authority shall not operate to relieve the Board of Directors, or any member thereof, of any responsibility imposed by law.

ARTICLE IV: OFFICERS

Section 4.01 Positions and Election. The officers of the Corporation shall be elected by the Board of Directors and shall be a President, a Secretary, a Treasurer and all other officers as may from time to time be determined by the Board of Directors. At the discretion of the Board of Directors, the Corporation may also have other officers, including but not limited to one (1) or more Vice Presidents or assistant Vice Presidents, one (1) or more assistant Secretaries, a Chief Financial Officer and a Chief Operations Officer, as may be appointed by the Board of Directors, with such authority as may be specifically delegated to such officers by the Board of Directors. Any two (2) or more offices may be held by the same person.

Each officer shall serve until a successor is elected and qualified or until the earlier death, resignation or removal of that officer. Vacancies or new offices shall be filled at the next regular or special meeting of the Board of Directors.

Section 4.02 Removal and Resignation. Any officer elected or appointed by the Board of Directors may be removed with or without cause by the affirmative vote of the majority of the

Board of Directors. Removal shall be without prejudice to the contract rights, if any, of the officer so removed.

Any officer chosen by the Board of Directors may resign at any time by giving written notice to the Corporation. Unless a different time is specified in the notice, the resignation shall be effective upon its receipt by the President, the Secretary or the Board.

Section 4.03 Powers and Duties of Officers. The powers and duties of the officers of the Corporation shall be as provided from time to time by resolution of the Board of Directors or by direction of an officer authorized by the Board of Directors to prescribe the duties of other officers. In the absence of such resolution, the respective officers shall have the powers and shall discharge the duties customarily and usually held and performed by like officers of corporations similar in organization and business purposes to the Corporation subject to the control of the Board of Directors.

ARTICLE V: INDEMNIFICATION OF DIRECTORS AND OFFICERS

Section 5.01 Indemnification of Officers or Directors. The Corporation shall, to the extent permitted by Chapter 156D, indemnify all persons who have served or may serve at any time as officers or Directors of the Corporation and their heirs, executors, administrators, successors and assigns, from and against any and all loss and expense, including amounts paid in settlement before or after suit is commenced, and reasonable attorney's fees, actually and necessarily incurred as a result of any claim, demand, action, proceeding or judgment that may have been asserted against any such persons, or in which these persons are made parties by reason of their being or having been officers or Directors of the Corporation. This right of indemnification shall not exist in relation to matters as to which it is adjudged in any action, suit or proceeding that these persons are liable for negligence or misconduct in the performance of duty.

Section 5.02 Non-Exclusivity of Indemnification Rights and Authority to Insure. The foregoing rights of indemnification and advancement of expenses shall be in addition to and not exclusive of any other rights to which any person may be entitled pursuant to any agreement with the Corporation, or under any statute, provision of the Articles of Organization or any action taken by the Directors or shareholders of the Corporation.

The Corporation may buy and maintain insurance to protect itself and any agent against any expense asserted against them or incurred by an agent, whether or not the Corporation could indemnify the agent against the expense under applicable law or the provisions of this Article V.

ARTICLE VI: SHARE CERTIFICATES AND TRANSFER

Section 6.01 Share Certificates. Shares of the Corporation may, but need not, be represented by certificates. Each certificate issued shall bear all statements or legends required by law to be affixed thereto. For all shares issued or transferred without certificates, the Corporation shall within a reasonable time after such issuance or transfer send the shareholder a written statement of the information required on share certificates pursuant to Chapter 156D, § 6.25(b) & (c) and § 6.27. Shareholders can request and obtain a statement of rights, restrictions, preferences and privileges regarding classified shares or a class of shares with two (2) or more

series, if any, from the Corporation's principal office. Each certificate issued shall bear all statements or legends required by law to be affixed thereto.

Every certificate for shares shall be signed by (i), the President, or a Vice President and (ii) the Chief Financial Officer, an assistant Treasurer, the Secretary or any assistant Secretary.

Section 6.02 Transfers of Shares. No shares of Common Stock of the Corporation may be subject to Transfer (as defined herein) without the approval of no less than unanimous consent of the Board. Notwithstanding any other provision of these Bylaws, each shareholder agrees that it will not, directly or indirectly, Transfer any of its shares or share equivalents, and the Corporation agrees that it shall not issue any shares or share equivalents if such Transfer would cause the Corporation to be unfit for licensure by the applicable cannabis regulatory body or otherwise subject to the applicable cannabis regulatory body for disciplinary action. In any event, the Board may refuse the Transfer of shares to any person if such Transfer would have a material adverse effect on the Corporation as a result of any regulatory or other restrictions imposed by any governmental authority.

Transfer of shares of the Corporation shall be made only on the books of the Corporation by the registered holder thereof or by such other person as may under law be authorized to endorse such shares for Transfer, or by such shareholder's attorney thereunto authorized by power of attorney duly executed and filed with the Secretary or transfer agent of the Corporation. Except as otherwise provided by law, upon surrender to the Corporation or its Transfer agent of a certificate for shares duly endorsed or accompanied by proper evidence of succession, assignment or authority to Transfer, it shall be the duty of the Corporation to issue a new certificate to the person entitled thereto, cancel the old certificate and record the transaction upon its books.

"Transfer" means to, directly or indirectly, sell, transfer, assign, pledge, encumber, hypothecate or similarly dispose of, either voluntarily or involuntarily, by operation of law or otherwise, or to enter into any contract, option or other arrangement or understanding with respect to the sale, transfer, assignment, pledge, encumbrance, hypothecation or similar disposition of, any shares owned by a person or any interest (including a beneficial interest) in any shares or share equivalents owned by a person.

Section 6.03 Registered Shareholders. The Corporation may treat the holder of record of any shares issued by the Corporation as the holder in fact thereof, for purposes of voting those shares, receiving distributions thereon or notices in respect thereof, transferring those shares, exercising rights of dissent with respect to those shares, exercising or waiving any preemptive right with respect to those shares, entering into agreements with respect to those shares in accordance with the laws of the Commonwealth of Massachusetts or giving proxies with respect to those shares.

Section 6.04 Lost, Stolen, or Destroyed Certificates. The Board of Directors may issue a new share certificate in place of any certificate it previously issued that the shareholder alleges to have been lost, stolen or destroyed provided that the shareholder or the shareholder's legal representative of the lost, stolen or destroyed certificate shall give the Corporation a bond or other adequate security sufficient to indemnify the Corporation against any potential claim against the

Corporation because of the alleged loss, theft or destruction of any such certificate or the issuance of such new certificate.

ARTICLE VII: CORPORATE RECORDS AND INSPECTION

Section 7.01 Records. The Corporation shall maintain adequate and correct books and records of account, minutes of the proceedings of the shareholders, Board of Directors and committees of the Board of Directors, and a record of its shareholders, including names and addresses of all shareholders and the number and class of shares held, along with any other records required by law. The Corporation shall keep such record of its shareholders at its principal office, as fixed by the Board of Directors from time to time, or at the office of its transfer agent or registrar. The Corporation shall keep its books and records of account and minutes of the proceedings of the shareholders, Board of Directors and committees of the Board of Directors at its principal office, or such other location as shall be designated by the Board of Directors from time to time.

Section 7.02 Inspection of Books and Records. The Corporation's accounting books and records and minutes of proceedings of the shareholders, Board of Directors and committees of the Board of Directors shall, to the extent provided by law, be open to inspection of Directors, shareholders and voting trust certificate holders, in the manner provided by law.

Section 7.03 Certification and Inspection of Bylaws. The Corporation shall keep in its principal office the original or a copy of these Bylaws as amended or otherwise altered to date, which shall be open to inspection by the shareholders at all reasonable times during office hours.

ARTICLE VIII: MISCELLANEOUS

Section 8.01 Checks, Drafts, Etc. All checks, drafts or other instruments for payment of money or notes of the Corporation shall be signed by an officer or officers or any other person or persons as shall be determined from time to time by resolution of the Board of Directors.

Section 8.02 Conflict with Applicable Law or Articles of Organization. Unless the context requires otherwise, the general provisions, rules of construction and the definitions of Chapter 156D shall govern the construction of these Bylaws. These Bylaws are adopted subject to any applicable law and the Articles of Organization. Whenever these Bylaws may conflict with any applicable law or the Articles of Organization, such conflict shall be resolved in favor of such law or the Articles of Organization.

Section 8.03 Invalid Provisions. If any one (1) or more of the provisions of these Bylaws, or the applicability of any provision to a specific situation, shall be held invalid or unenforceable, the provision shall be modified to the minimum extent necessary to make it or its application valid and enforceable, and the validity and enforceability of all other provisions of these Bylaws and all other applications of any provision shall not be affected thereby.

Section 8.04 Emergency Management of the Corporation. In anticipation of or during an emergency, as defined in Chapter 156D, § 3.03(d), the Board, in order to conduct the ordinary business affairs of the Corporation, shall modify procedures, including, but not limited to, calling a board meeting, quorum requirements for such board meeting and designation of additional or

substitute Directors; *provided*, that such modifications may not conflict with the Articles of Organization.

In anticipation of or during an emergency, the Corporation shall be able to take any and all of the following actions to conduct the Corporation's ordinary business affairs and operations:

- (a) Modify lines of succession to accommodate the incapacity of any Director, officer, employee or agent resulting from the emergency.
- (b) Relocate the principal office or designate alternative principal offices or regional offices.
- (c) Give notice to Directors in any practicable matter under the circumstances, including but not limited to publication and radio, when notice of a board meeting cannot be given in a manner prescribed by these Bylaws.
- (d) Deem that one (1) or more officers present at a board meeting is a Director as necessary to achieve a quorum for that meeting.

Section 8.05 Reports. The Corporation shall provide all shareholders with notice of the availability of annual financial reports of the Corporation before the earlier of the annual meeting of the shareholders or one hundred and twenty (120) days after the close of the fiscal year. Such financial reports shall be prepared and provided to the shareholders upon request in compliance with Chapter 156D, § 16.20.

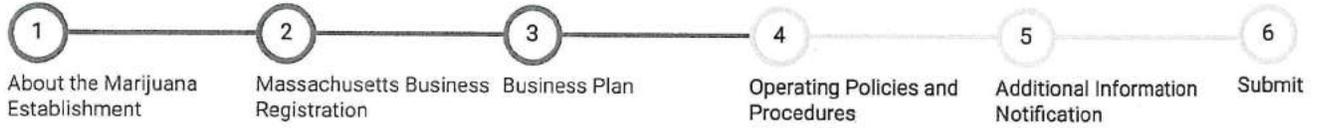
Section 8.06 Advisement of Counsel. THE CULTIVATION, PRODUCTION AND SALE OF CANNABIS IS ILLEGAL UNDER FEDERAL LAW. NEITHER PARTY, NOR ATTORNEYS FOR COMPANY, HAVE MADE ANY REPRESENTATION TO THE CONTRARY.

ARTICLE IX: AMENDMENT OF BYLAWS

Section 9.01 Amendment by Shareholders. Shareholders may adopt, amend or repeal these Bylaws by the vote or written consent of the holders of a majority of the outstanding shares entitled to vote, except as otherwise provided by law, these Bylaws or the Articles of Organization.

Section 9.02 Amendment by Directors. Subject to the rights of shareholders as provided in Article IX, and the statutory limitations of Chapter 156D, the Board of Directors may adopt, amend or repeal these Bylaws.

Cannabis Control Commission > My Licenses > Marijuana Retailer



Application #: MRN282565

Business Plan

Please provide information below on the Marijuana Establishment's Business plan. The following information is required:

- Business Plan
- Proposed Timeline
- Plan for Obtaining Liability Insurance

Please upload documentation providing this information in the field below.

Business Plan Documentation *

	<p>Document Name: East Coast Remedies - Proposed Timeline.pdf</p> <p>Document Category: Proposed Timeline</p> <p>Upload Date: 4/4/19</p>	
	<p>Document Name: East Coast Remedies - Plan for Obtaining Liability Insurance.pdf</p> <p>Document Category: Plan for Liability Insurance</p> <p>Upload Date: 4/4/19</p>	
	<p>Document Name: East Coast Remedies - Business Plan.pdf</p> <p>Document Category: Business Plan</p> <p>Upload Date: 4/4/19</p>	

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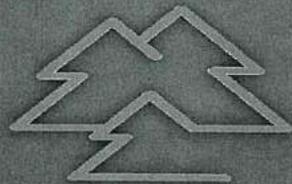
PROPOSED TIMELINE

- Receive Community Host Agreement with City of Somerville: May 15th, 2019
- Submit application for Adult-use-retail license to the CCC: May 15th, 2019
- Provision license approval: June 2019
- Site plan review: June 2019
- Estimated construction start date : August 2019
- Estimated completed construction end: September 2019
- CCC inspection: September 2019
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- Opening day: Fall 2019
- Connect with community organizations and local schools to conduct an assessment of substance abuse program needs/gaps (Fall 2019).
- Hire Youth Specialist to work with local partner to implement substance abuse program for pre-teen, youth and parents (Spring 2020).

East Coast Remedies Corp.

PLAN FOR OBTAINING LIABILITY INSURANCE

East Coast Remedies Corp. ("East Coast Remedies") plans to contract with an insurance provider to maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate annually and product liability coverage for no less than \$1,000,000 per occurrence & \$2,000,000 in aggregate annually. The policy deductible will be no higher than \$5,000 per occurrence. East Coast Remedies will consider additional coverage based on availability & cost-benefit analysis. If adequate coverage is unavailable at a reasonable rate, East Coast Remedies will place in escrow at least \$250,000 to be expended for liabilities coverage. Any withdrawal from such escrow will be replenished within 10 business days. East Coast Remedies will keep reports documenting compliance with 935 CMR 500.105(10).



EAST COAST
REMEDIES

MISSION STATEMENT

“

EAST COAST REMEDIES IS AN ECONOMIC EMPOWERMENT CANNABIS ORGANIZATION WITH THE DESIRE TO "SET THE STANDARD" IN RECREATIONAL CANNABIS DISTRIBUTION. OUR PRIMARY FOCUS IS TO EXCEED EXPECTATIONS. AS AN ECONOMIC EMPOWERMENT OWNED COMPANY, IT IS OUR MISSION TO ALIGN OUR BUSINESS GOALS WITH THE *CULTURAL VALUES OF THE SOMERVILLE COMMUNITY. OUR CORE AMBITION IS TO ELEVATE THE CUSTOMER'S EXPERIENCE BY PROVIDING THEM WITH RELEVANT, HUMANIZING, CANNABIS EDUCATION, GENERAL PRECAUTIONS AND INFORMATION + HIGH BUSINESS STANDARDS/ETIQUETTE, AND HIGH-QUALITY CANNABIS PRODUCTS. FOR THE FIRST TIME IN HISTORY THE ADULT-USE CONSUMER OF MASSACHUSETTS WILL HAVE THE ABILITY TO PURCHASE QUALITY, LAB TESTED MARIJUANA PRODUCTS IN A SAFE AND SECURE ENVIRONMENT.

— *East Coast Remedies (#TeamECR)*

”

MANAGING PARTNERS

GLADYS VEGA

EXECUTIVE DIRECTOR OF THE CHELSEA COLLABORATIVE

•Gladys Vega was born in Puerto Rico and came to Chelsea with her family at the age of nine. Since that time, Gladys has made a lifelong commitment to the community in which she was raised. Being a mother of two has deepened her commitment to building a better future.

•Joined the organization in 1990, two years after its inception as the Chelsea Human Services Collaborative — from receptionist to community organizer to Assistant Executive Director becoming the Executive Director in 2006.

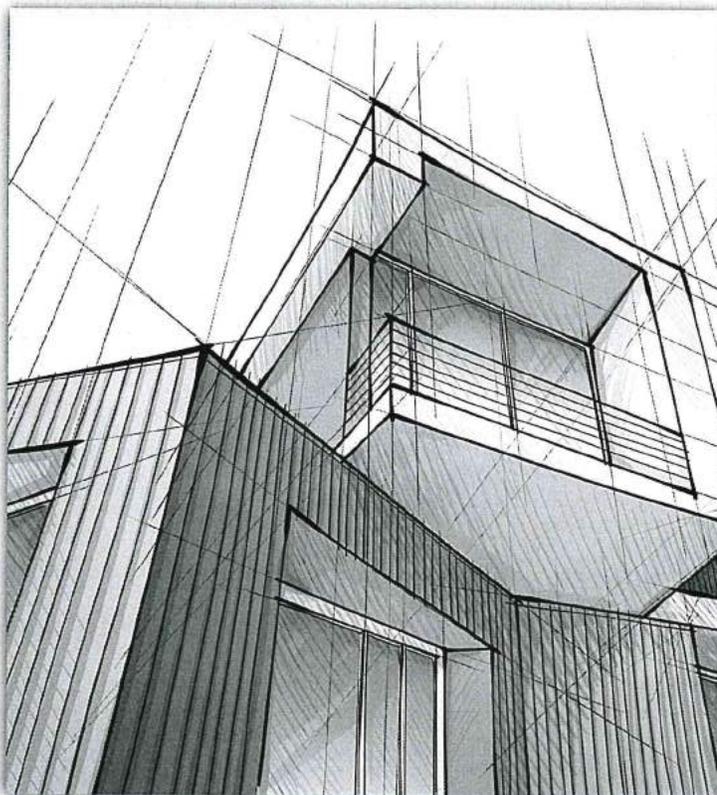
•Ms. Vega has worked as an organizer and an advocate to ensure that the Latino community has a role in determining the ways its needs and concerns are addressed. Ms. Vega believes that empowerment of the individual leads to empowerment of the community and that social action is the vehicle an empowered community can use to achieve its goals.

•She is the architect of most of the Collaborative's community coalitions. She has played leadership roles in organizing for immigrants' rights, welfare rights, tenants' rights, open space and the environment, multicultural and anti-racism programs and in numerous grassroots campaigns. She is not only a successful community organizer, but also one of Chelsea's most prominent and important community leaders, receiving citywide, statewide and national accolades for her leadership. In 2010 she was awarded a Barr Foundation Fellowship which enabled her to travel to Haiti to participate in a learning journey with 11 other non-profit Executive Directors from Massachusetts. Gladys was instrumental in organizing thousand of victims in a national investigation that went viral. The American Greed: Fraud Gone Viral-CNBC Prime. With the support of her community, Gladys is behind in changing or creating new legislative policies that addresses the most vulnerable members of her community and in the State.



THOMAS MOURMOURAS

CHIEF FINANCIAL OFFICER



Education: John Hopkins University

Graduated from Johns Hopkins University, Whiting School of Engineering, with a major in Nanotechnology/Biomaterials Engineering with a minor in Entrepreneurship and Management.

Work Experience:

- **The Tax Doctor, Old Orchard Beach (2014-Current)** Tax Consultant
Assisting in tax preparation for local individuals and small businesses, focusing on the research and tax strategy required to best serve the needs of clients. In tax year 2018, our office brought over 1 million in sales and income tax into the state.
- **Fiscal Therapy Financial, Portland (2016-Current)** Managing Partner
Advises organizations on key strategic issues concerning restructuring and progression, as well as how to improve profitability, competitive advantage, and efficiency. Our office currently works with over 300 medical marijuana businesses in Maine.
- **Old Port Development, LLC DBA Fire on Fore (2018-Current)** Co-Founder, Partner
Owner and operator of Portland's premier medical marijuana storefront located in the historic Old Port. Store is projected to exceed \$6 million in revenue in 2019 and is positioned to be first to Portland's Adult-Use market in 2020.
- **Rosebud, LLC (2018-Current)** Managing Partner, Founder
Owner and operator of South Portland's first Medical Marijuana Caregiver Storefront. Store is positioned to be first to South Portland's Adult-Use and Medical Marijuana ordinances and zoning.

Related Experience:

Seminar and Trade Show Speaking experience

- **Maine Town and City Managers Association Annual Meeting on Marijuana** (March 2017)
- **National Business Institute: Marijuana Business Law in Maine** (December 2016&October 2017)

Municipal Experience

- **Member of Old Orchard Beach's Zoning Board of Appeals & Comprehensive Plan Committee**

PROPOSED
LOCATION

161 BROADWAY, SOMERVILLE, MA 02145

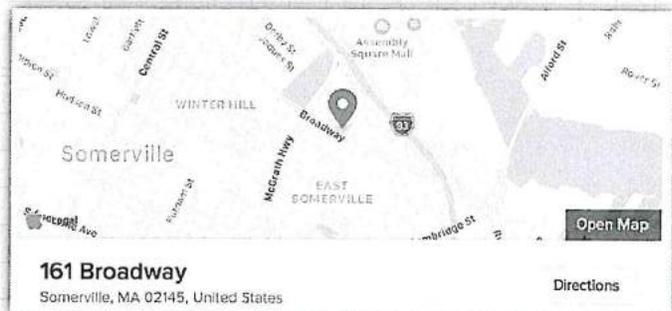
BRIEF SUMMARY

The existing commercial space is approx. 1900 sq ft., street level, and shall be leased from RFR Realty Trust. Through the main entrance, the customer will be greeted, and informed to check-in at the reception/waiting area in lieu of entering the product floor. (This space includes a security office, storage vault and restrooms.) The tasteful design, elegant lighting, and charming ambience provides for delightful, amplified, and aesthetically pleasing experience.

Hours of Operation: 9am - 9pm.

Secure layout: Security is of the utmost importance and for that reason there will be only one point of access/egress.

Existing parking: 50+ vehicles and bicycle storage (more than ample amount of parking)



PROPOSED TIMELINE

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EMPLOYEE POLICIES & RECORD KEEPING

EMPLOYEE POLICIES

East Coast Remedies will be held to the highest standards of conduct.

Prior to employment prospective employees must:

- Be of the age of 21 years/ or older
- Submit to background check

All apprentice employees will be given a compliance regulations and product knowledge company manual. During training period each new employee will be expected to learn the contents as well as attend and complete a responsible vendor program per 935 CMR 500.105(2). Included in company manual:

- Current compliance regulation procedures
- Product knowledge
- Employee conduct
- Workplace ethics
- Alcohol and drug free workplace
- Standard operating procedures
- Emergency procedures
- Equal opportunity employer policy
- Freedom from harassment and discrimination policy
- Sexual harassment prevention policy
- Open door policies
- American with disabilities act
- Health insurance portability and accountability act

RECORD KEEPING

- East Coast Remedies shall maintain all records in accordance with 935 CMR 500.000. These records are to include, but not limited to, standard operations procedures in compliance with 935 CMR 500.105. Records of a marijuana establishment shall be available for inspection by the Commission, upon request. The records of a Marijuana Establishment shall be maintained in accordance with generally accepted accounting principles. Written records that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the following:
- Record Keeping. Records of a Marijuana Establishment must be available for inspection
 - (a) Written operating procedures as required by 935 CMR 500.105(1)
 - (b) Inventory records as required by 935 CMR 500.105(8)
 - (c) Seed-to-Sale tracking records for all marijuana products as required by 935 CMR 500.105(8)
 - (d) The following personnel records:
 - Written operating procedures as required by 935 CMR 500.105(1); Inventory records as required by 935 CMR 500.105(8);
 - 1. Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions.
 - 2. A personnel record for each marijuana establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
 - a. All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - b. Documentation of verification of references;
 - c. The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision

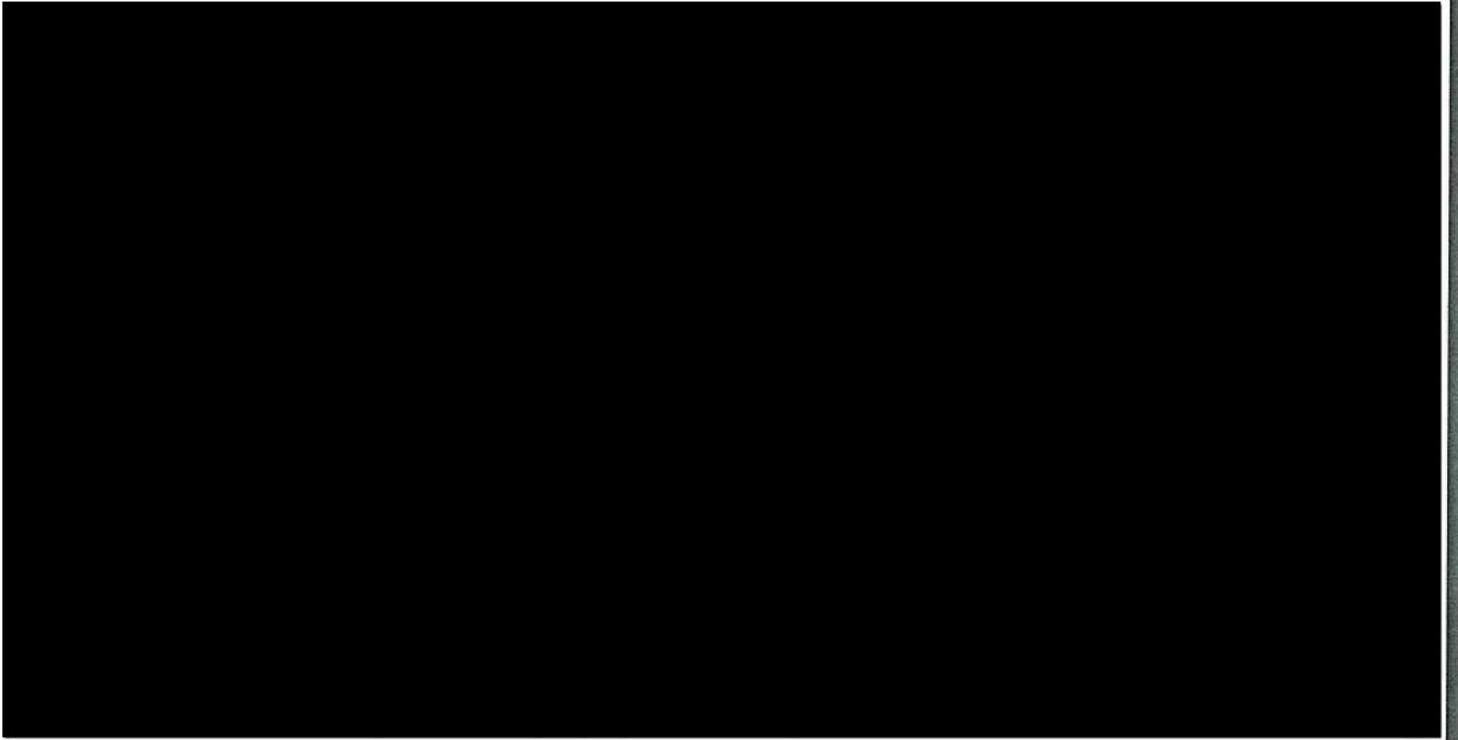
RECORD KEEPING

CONT.

- d. Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
- e. Documentation of periodic performance evaluations
- f. A record of disciplinary action taken: and
- g. Notice of completed responsible vendor and eight-hour related duty training.
- 3. A staffing plan that will demonstrate accessible business hours and safe working conditions;
- 4. Personnel policies and procedures: and
- 5. All background check reports obtained in accordance with 935 CMR 500.030
- (e) Business records, which shall include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products; and
 - Salary and wages paid to each employee, stipend paid to each board member, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a Marijuana Establishment, including members of the nonprofit corporation, if any.
- (f) Waste disposal records as required under 935 CMR 500.105(12): and
- (g) Following closure of a marijuana establishment, all records must be kept for at least two years at the expense of the marijuana establishment and in form and location acceptable to the commission.

ON/OFF-SITE SECURITY
PLANS/VISUALS

SECURITY PLANS



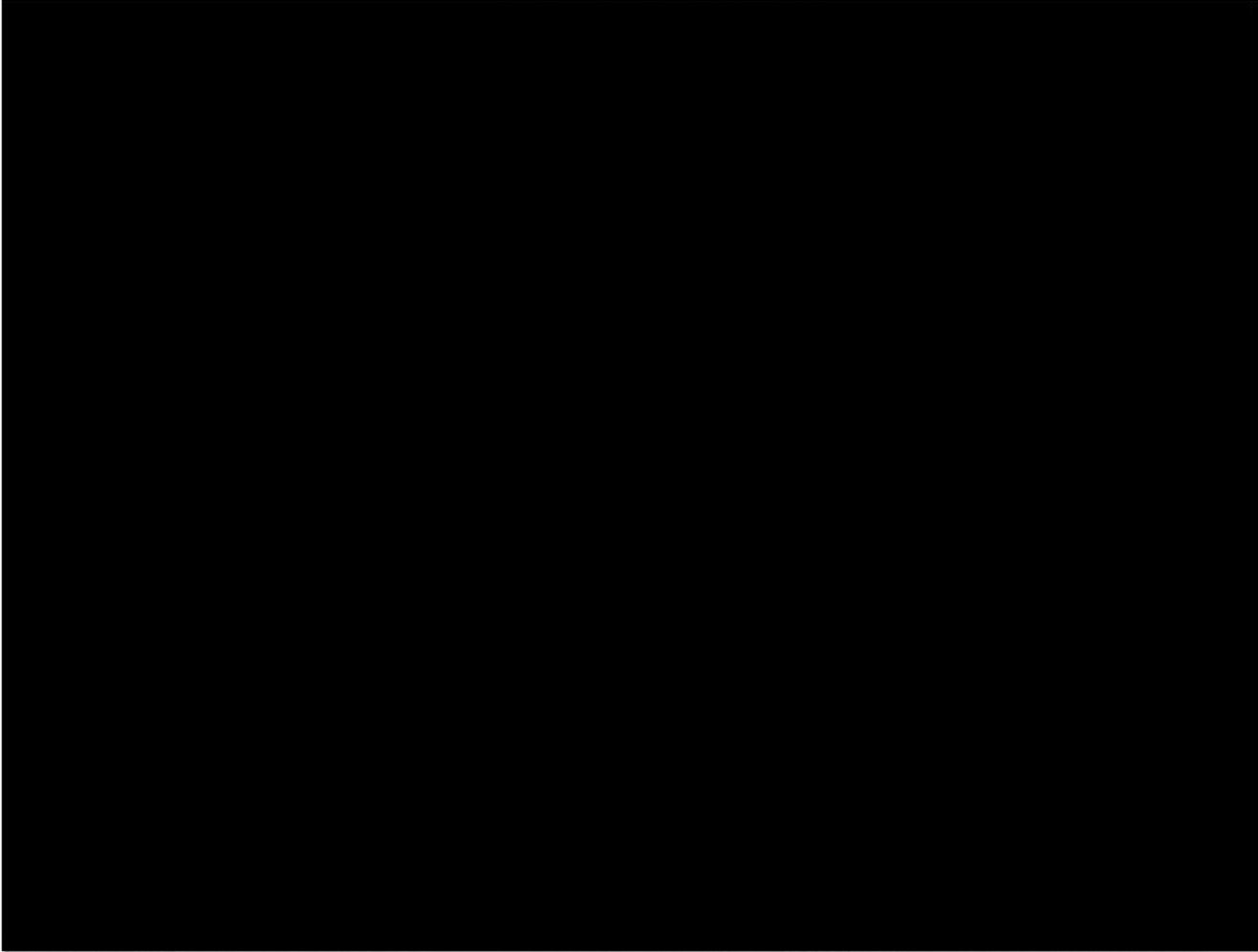
RESTRICTED ACCESS

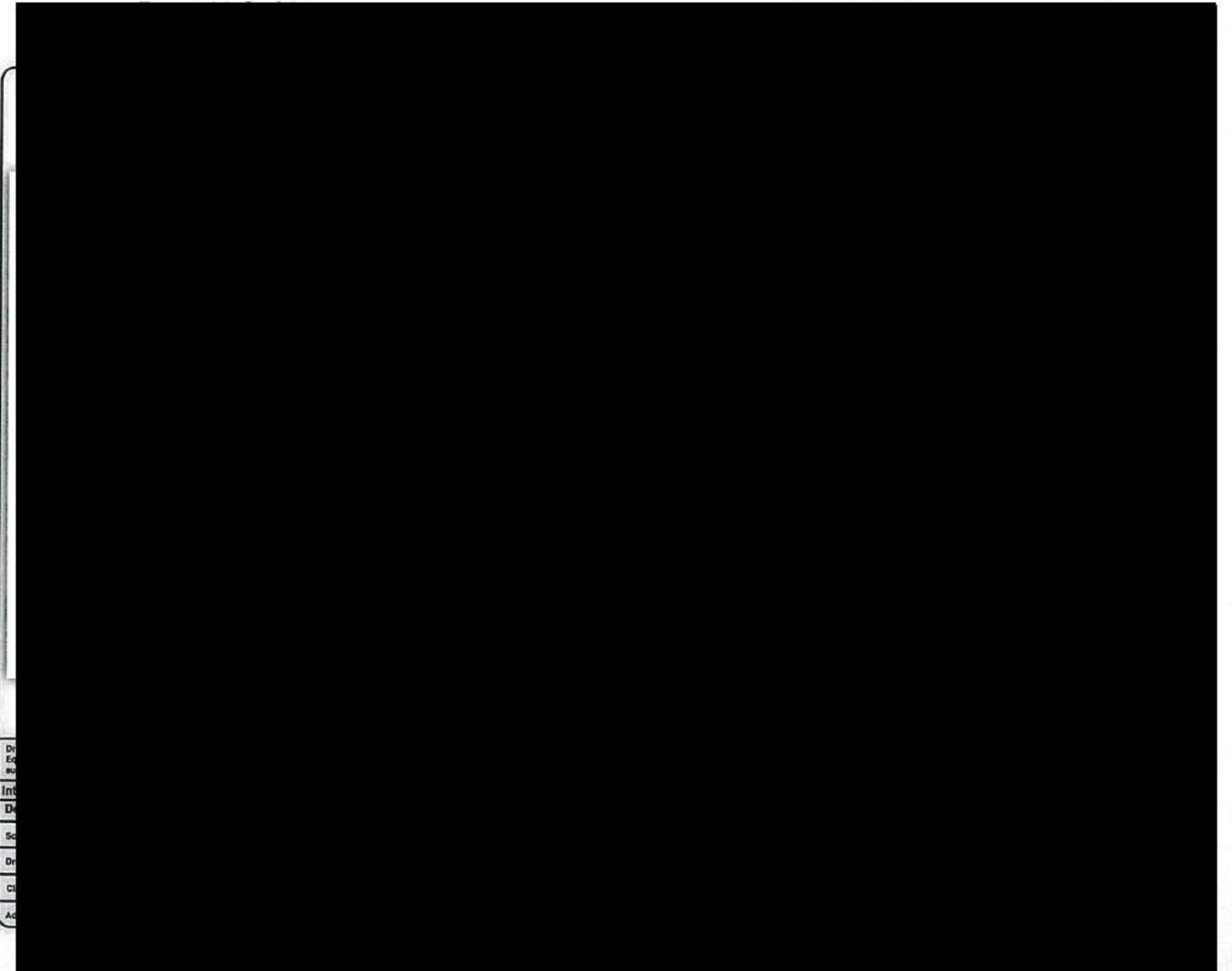
East Coast Remedies in compliance with 935 CMR 500.000 will not permit anyone under the age of 21 years to enter our establishment. All ECR boards member, employees and volunteers must be of the age of 21 year or older. Upon entry to vestibule an ECR security officer will immediately inspect individuals proof of identification and determine the legal age of that individual before granting access to enter.

EXTERIOR CAMERAS



INTERIOR CAMERAS

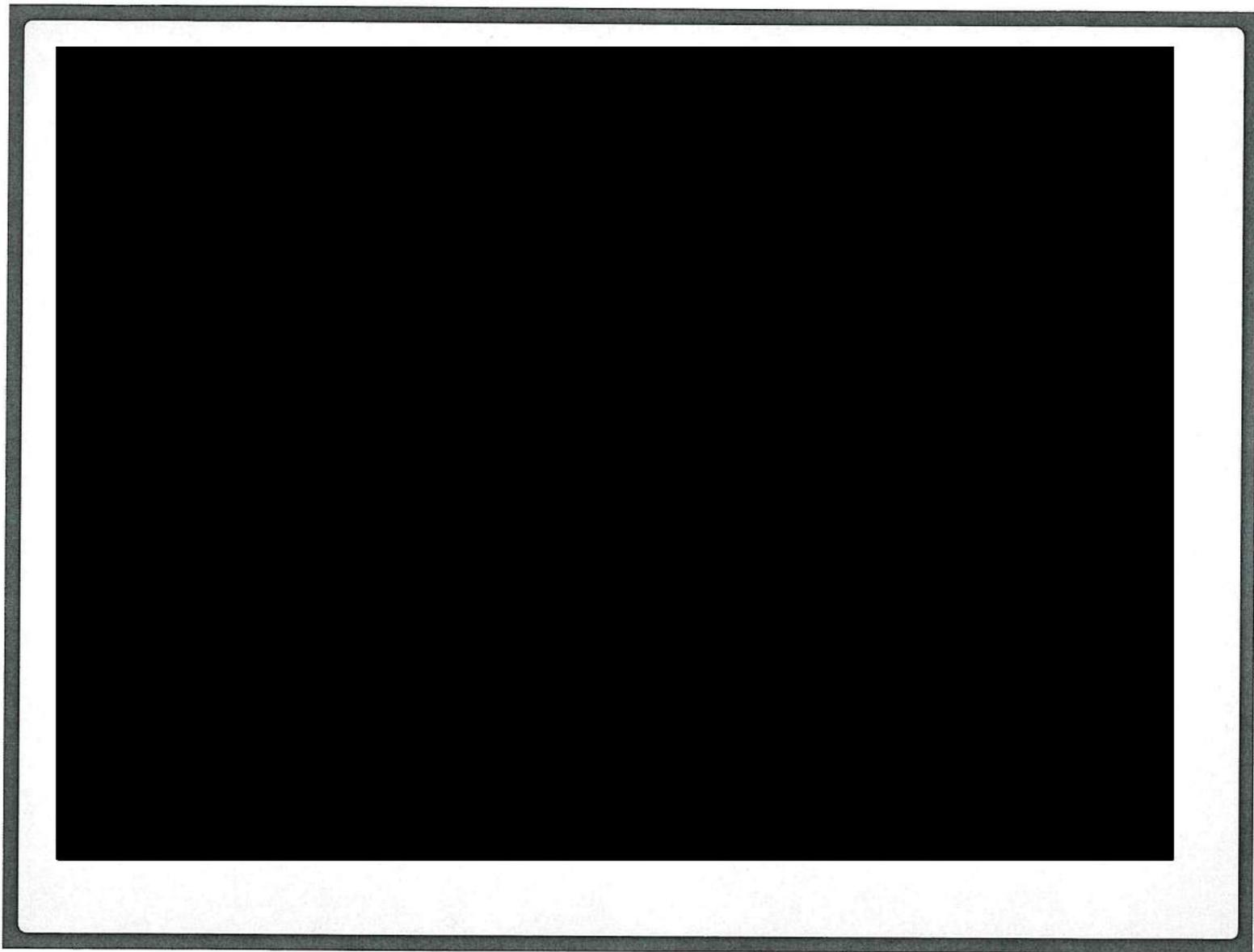


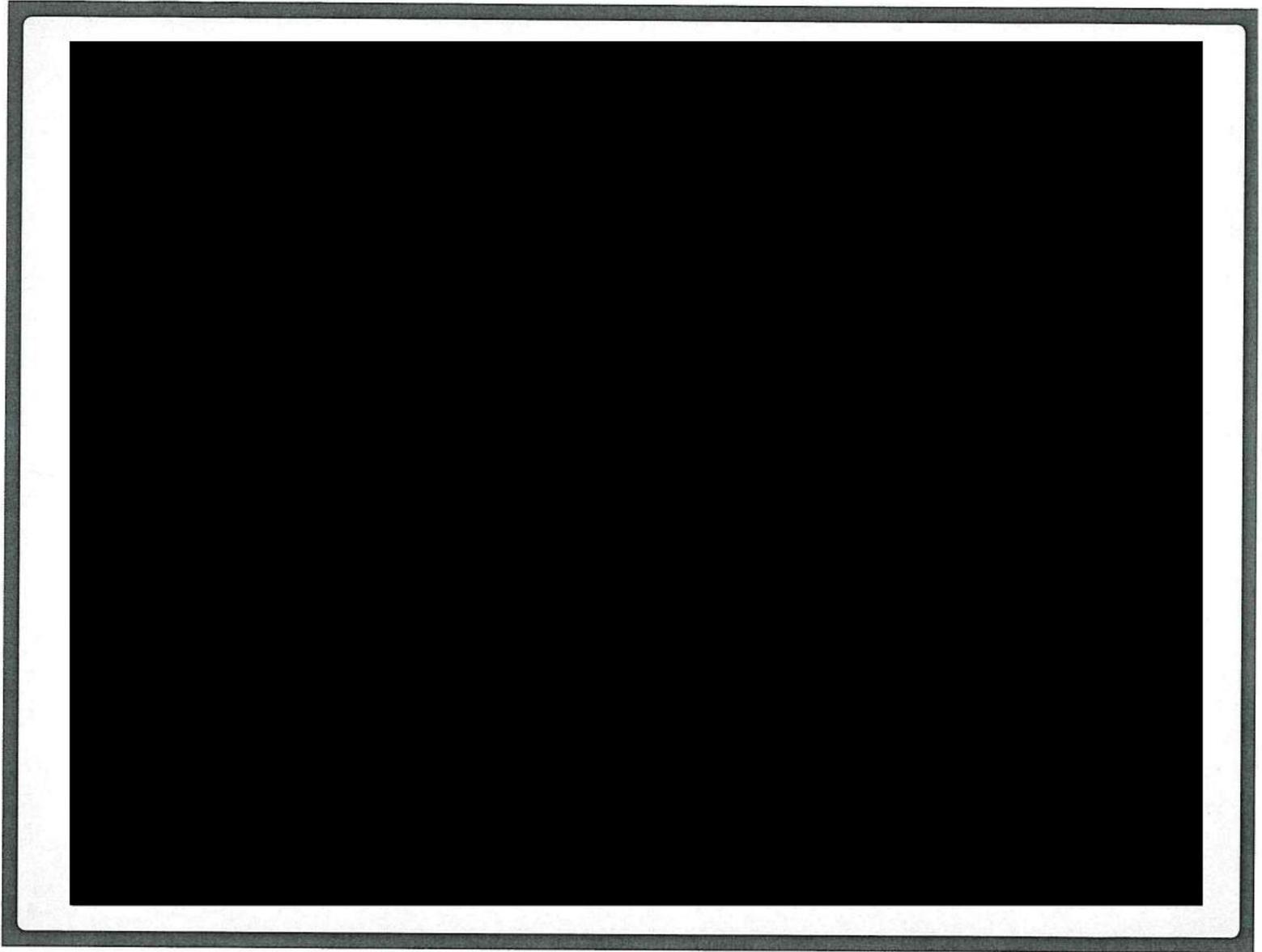


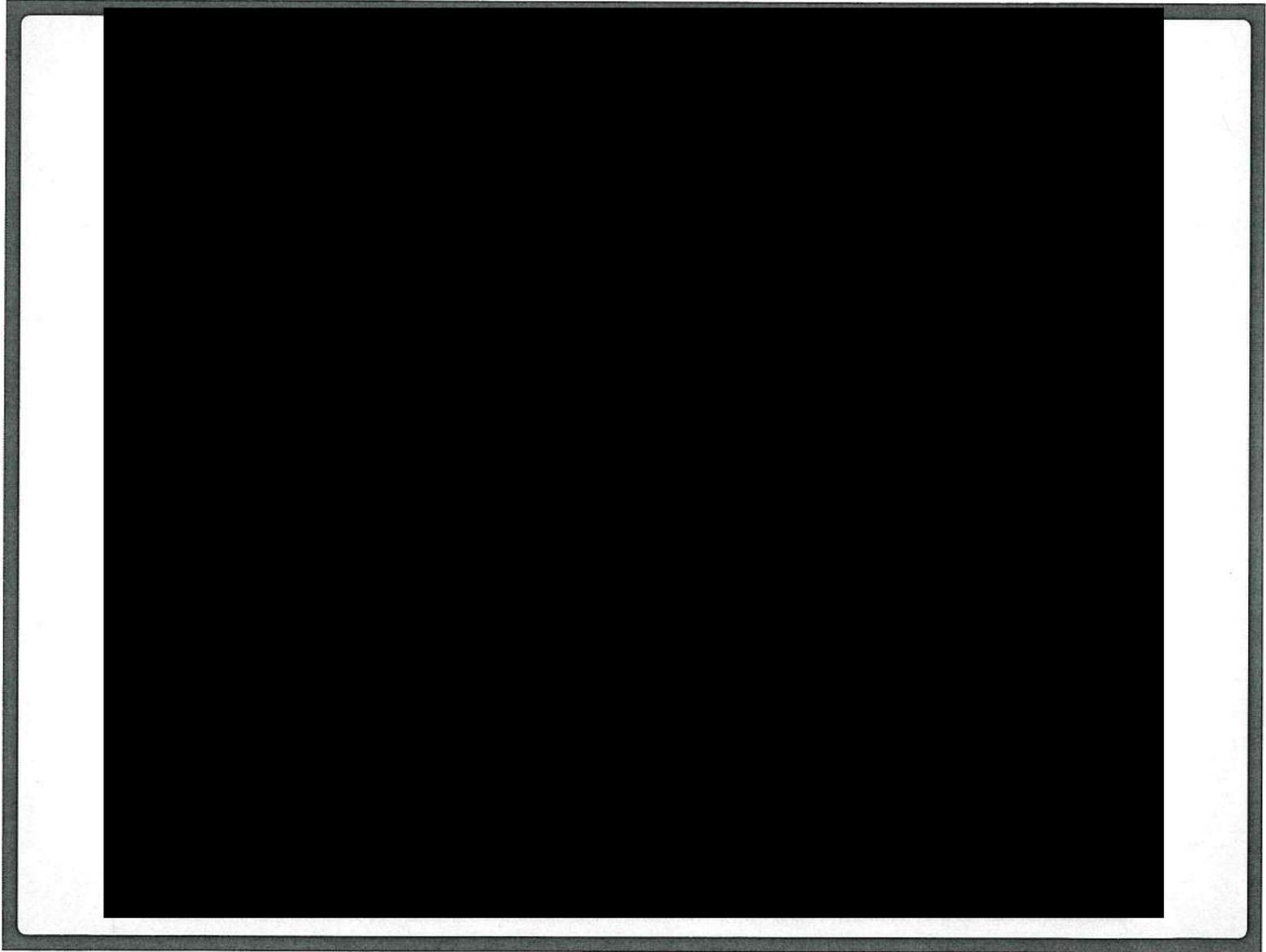
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QUALITY CONTROL & TESTING
| INVENTORY PROTOCOL |
STORAGE | TRANSPORTATION

QUALITY CONTROL AND TESTING

It is our goal at East Coast Remedies to provide only the best quality products to our clientele. It is for this reason we employ a full time quality control agent. All product must be tested by an independent state licensed laboratory per 935 CMR 500.160 before entering our inventory system. After product has been entered into our system it is monitored and inspected daily* until the time of sale.

INVENTORY PROTOCOLS

ECR shall maintain a real-time inventory as specified by commission and in compliance of 935 CMR 500.105(8). ECR shall comply with the following:

- 1. Establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of marijuana products in the process of cultivation, and finished, stored marijuana;
 - 2. Conduct a monthly inventory of marijuana in the process of cultivation and finished, stored marijuana;
 - 3. Conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and
 - 4. Promptly transcribe inventories if taken by use of an oral recording device.
- The record of each inventory shall include, at minimum, the date of the inventory, summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.
- A Marijuana Establishment shall tag and track all marijuana products, using a seed-to-sale methodology in a form and manner to be approved by the Commission.
- No marijuana product, including marijuana, may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

STORAGE OF CANNABIS

East Coast Remedies storage shall comply with the requirements set forth by the Commission in 935 CMR 500.105.

- All Product not displayed in dispensary area shall be stored in concrete reinforced storage vault.
- Storage vault will be equipped with temperature and humidity control for optimal storage environment in compliance with 935 CMR 500.105.
- Storage area will be kept clean and pest free at all times.
- Storage area will have ample space, lighting and ventilation
- All product inventory shall be inspected daily for deterioration, microbial/pest contamination and physical damage.
- Access to storage vault will be granted to shift managers only and will be secured in compliance with 935 CMR 500.110.
- Storage areas will be locked/secured and under 24 hour surveillance

TRANSPORTATION OF MARIJUANA

TRANSPORTATION PROCEDURES

- All marijuana product transportation shall be conducted by registered ECR agents only
- Transportation of all marijuana products must be conducted with ECR registered vehicles only.
- Each ECR transportation vehicle shall have real time GPS tracking
- ECR transportation agents must log departure and arrival times when traveling to and from ECR store and processing/cultivation facilities.
- Upon arrival for pick up at cultivation facility, agents must: communicate with dispatch, record weights of product and log seed-to-sale info before departure.
- Once delivered to ECR store all products must be weighed and accounted for before submitting into METRIC inventory system.

DIVERSION





CUSTOMER EXPERIENCE & PRODUCT CATEGORIES

CUSTOMER EXPERIENCE

Our goal at East Coast Remedies is to provide a relaxing and educational experience to our customers. For the first time in history adult-use marijuana consumers of Massachusetts will be able to safely walk into our store and purchase marijuana with confidence. Our team of skilled agents will have the ability to answer questions about effects, benefits, product contents and testing results, giving our customers the comfort of knowing exactly they're getting. Upon entry into East Coast Remedies:

- Security greeting/ Id check /introduction
- Customer agreement (for first time visitors)
- Identify customer needs
- Educate on origins, effects and benefits of various products
- Provide guidance for customers needs

PRODUCT CATEGORIES

East Coast remedies plans to offer a wide array of products to accommodate the specific needs of our customers. All ECR products shall be packaged in childproof packaging and labeled with serving sizes, testing results and product warnings. Products will be separate into various categories such as:

- Herb: Flower, Pre-rolls
- Concentrate: Live resin, Shatter, Distillate, Vape- cartridges
- Topicals/Oral: Salves, Lotions, Tinctures, etc.
- Edibles: Chocolates, Fruit chews, Cookies, Brownies, etc.

DIVERSITY &
POSITIVE IMPACT

DIVERSITY GOALS

East Coast Remedies is an equal opportunity employer. As an economic empowerment collaborative it is our mission to build a team of diverse individuals from various backgrounds, perspectives and identities. To accomplish this goal ECR shall provide employment opportunities for individuals of all races, religions, genders, colors, age, sexual preference or military practice, without discrimination.

- Form a hiring process recruiting team members from diverse backgrounds, perspectives and identities.
- Providing career building opportunities, training and education to minorities
- Offering employment opportunities including but not limited to, hiring, benefits, promotion, salary and other conditions of employment.
- Create a work environment that encourages those of all walks of life, a diverse team that feels valued in our company.
- Encourage management opportunities to above mentioned demographics
- Implement fair compensation practices for all employees

DIVERSITY PROGRAMS

- Provide the training needed for all new employees educating those on our values, culture and diversity within the workplace.
- Implement employee development programs and ongoing training to help build employees knowledge of the marijuana industry.
- Provide employees opportunities to participate in further education events such as conferences, courses and seminars.
- Offering various benefits to our employees including but not limited to product discounts, vacation time, daycare services and marijuana event travel opportunities.
- Provide the tools and education needed to assist employees interested in furthering their careers in the marijuana industry.

DIVERSITY EVALUATION

PLAN FOR EVALUATING DIVERSITY WITHIN THE WORKPLACE

- Research the percentage of minorities, women, disabled, veterans and individuals who identify as LGBT
- Diversity in the workplace: Assess the number of employees hired, trained and currently employed who are part of the demographics mentioned previously.
- Job retention and turn over rates of diverse employees.
- Evaluations of promotions and pay increases among employees.
- Employees questionnaire upon position exit to gather information about possible discrimination, opportunities provided and fair compensation.

POSITIVE IMPACT PROGRAMS

- Provide job training and community education to help assist and educate Somerville residents on adult-use in Massachusetts.
- Mentoring and professional services to individuals in disproportionate impact areas.
- Provide assets such as resources, time and financial assistance to these areas.
- Discounting products for those with chronic illnesses, financial hardships, veterans, senior citizens and Somerville residents.

5% OFF FOR SOMERVILLE RESIDENTS

10% OFF FOR SENIOR CITIZENS

10% OFF FOR VETERANS

10% OFF FOR THOSE WITH FINANCIAL HARDSHIP

15% OFF FOR THOSE WITH CHRONIC ILLNESS

(THE ABOVE DISCOUNTS ARE SUBJECT TO REGULATORY APPROVAL BY THE COMMISSION.)

MEASURING POSITIVE IMPACT

To properly assess the impact of our business on the community, the following information shall be gathered and evaluated annually. By compiling this information ECR can assess the success or downfall of our positive impact programs.

- Total gross dollar amount of discounts provided to our patients.
- Number of employees hired and trained from Somerville and areas of disproportionate impact.
- Number of jobs created in the marijuana industry to Somerville residents and individuals in areas of disproportionate impact.
- Financial information detailing total donations given to specific causes.
- Number of business and individuals participating in our programs.
- Number and jobs created within the marijuana industry in areas of disproportionate impact.

COMMUNITY OUTREACH

CC SERVICES

- Workers Center: Organizing and community education for workers' rights and economic justice; and
- Affordable housing and Tenancy Preservation Advocacy
- Youth Employment and Training Initiative
- Chelsea Voter Initiative: Outreach, education and organizing to increase voter education and engagement among diverse residents.
- Economic Justice Advocacy
- Immigration & Citizenship Support: Legal aid, case management, advocacy, citizenship classes & tutoring, ESOL classes, clinics, and more; and
- Workforce Development Pipeline for Adults: Work readiness training, career advising, case management and job placement support in expanding industries throughout the region.

The Applicant will donate annually to the Chelsea Collaborative to support its community initiatives in the city of Chelsea and its plans to expand into Somerville. Our funding will require the CC to also focus on the potential impacts of recreational marijuana on pre-teen youth and families. Together, we will develop community outreach and education initiatives to mitigate any negative impacts of recreational marijuana in the community, especially on pre-teen youth who at-risk of becoming addicted.

AWARENESS AND PREVENTION

Describe how the Applicant will prevent and educate youth and families about the dangers of underage exposure to, and the consumption of, recreational marijuana. Describe how the Applicant will sustain these efforts over time.

- The Applicant will coordinate with the Chelsea Collaborative to provide programming for substance abuse prevention for local youth and specifically pre-teens in newcomer communities. With this funding, the Chelsea Collaborative will hire a substance abuse youth prevention specialist who will work with local partners in Chelsea and Somerville. This proven strategy is a cultural competent curriculum that increases community readiness and engages communities in prevention activities and actions to reduce use of harmful legal products among youth. The program will focus on prevention among youth, ages 11-14 (middle schoolers), in Chelsea, Everett, Somerville, and Malden (communities where we expect the largest impact). The CC Specialist will create working partnerships with the public-school districts in each city to offer a school-based substance abuse and violence prevention program. Activities will be designed to educate youth about the dangers of underage exposure to, and the consumption of, recreational marijuana. Education will cover restrictions on public consumption and use of recreational marijuana, the risks of second-hand smoke, risks to minors, and the dangers of operating a motor vehicle while under the influence. The program will also encourage youth to communicate with their parents, develop resiliency and protective behaviors to prevent engagement in substance use and violence. By connecting youth to opportunities and career pathways, we also provide young people with meaningful incentives to avoid substances and risky behaviors. Classroom-based activities will support youth to build new skills, develop educational and career goals, form positive relationships with their parents, peers and adults, and participate in vocational field trips.

CHARLAS COMUNITARIAS

The Chelsea Collaborative will also provide a series of quarterly *Charlas* (workshops) for parents of children in grades 4-8, if needed an additional curriculum will be used for High School aged group. The *charlas* will provide parents of children and youth at a critical age with the skills needed to promote drug resistance. Skill areas of focus include developing behavioral expectations and increasing familial bonds. Recognizing the importance of positive parental involvement, the program is engaging and interactive to build skills that will support youth to avoid recreational marijuana and other substances. The curriculum educates parents about the dangers of underage exposure to, and the consumption of, recreational marijuana. Parents will receive a guide of suggested activities, topics, and exercises that they can do with their children to build relationships, trust, and resiliency.

Hiring practice:

The Chelsea Collaborative has over 30 years of experience as employers. We have develop a strong hiring strategy that reflects the community we work with, 80% of our workforce live in the city of Chelsea, most of the employees are bicultural-bilingual and for the past five years we have had a 85% retention rate.

Our goal has been to implement a productive and safe environment beyond implementing policies or forcing. We have Conducted employee cultural competence surveys that have given us great insight as to how organizational should promote, evaluate and train our team members.

Our personal handbook effectively contains policies to address workplace discrimination that include the diversity compliance policy, an anti-discrimination model, inform all team members of what behaviors are and are not allowed, outline the pay and benefits structure, and provide clear grounds for termination.

Describe how the applicant will inform customers about restrictions on public consumption and workplace use, the risks of second hand smoke, and dangers of operating a motor vehicle while impaired:

- All ECR customers are required to sign our “customer agreement” acknowledging understanding of: how to consume adult-use products responsibly, safe storage, responsible and lawful use, caution warnings and effects.
- All products shall include the appropriate information and warnings outlining the possible dangers of second hand smoke and impaired driving.
- Our customer are made aware of rules against public consumption, loitering, diversion or any other unauthorized behavior.
- Brochures, pamphlets and media images shall be displayed throughout waiting area with information on potential health risks, benefits and regulations.
- Upon check-out of ECR each customer shall receive literature on product safety, general information, and legal use of all products

Describe how applicant will market its products, including, but not limited to, broadcast, print, and online advertising, direct-response advertising, social media, and signage:

- All forms of ECR marketing shall be in compliance with the requirements set forth in 935 CMR 500.105 (4)
- ECR website shall allow access to 21+ only
- ECR shall not participate in any marketing or advertising of sports events, sponsorship of charitable event, or similar events; unless at least 85% of such event is reasonably expected to be 21 year of age or older.
- ECR shall only participate in reasonable marketing, advertising and branding not otherwise prohibited in 935 CMR 500.105(4) (b)
- All marketing, branding and advertising shall include the appropriate warnings and information outlined in 935 CMR 500.105(4) (a) (b)

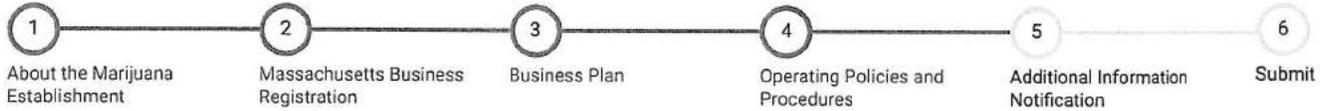
Describe the sources of the applicant's inventory and manufacturing materials:

- All adult-use products to be offered at ECR shall be from licensed Massachusetts marijuana manufacturing companies. All products purchased by ECR from manufacturers shall be tested and evaluated by an approved, state licensed laboratory.
- At this time ECR plan to purchase product and work closely with local manufacturers like *REV CLINICS*, as well as other suppliers like *BASK CANNABIS*.
- ECR plans to align ourselves with other like minded companies with strong focuses on consistent quality and 100% compliancy with state adult-use regulations.

Describe how the applicant will package and label products at point of sale:

- All ECR products shall be packaged and labeled in accordance with 935 CMR 500.105(5)
- All products shall be labeled with: manufacturer's name and registration number, quantity of usable marijuana contained, packaged on date, batch number, product weight, ingredients, cannabinoid levels, required warnings and all other information established in 935 CMR 500.105(5) part a, b, c and d.
- No packaging or labeling will contain cartoons, characters, or any other images that may be appealing to minors under the age of 21
- All adult-use products shall be packaged in commission approved tamper proof/Child resistant packaging. In compliance with 935 CMR 500.105(6)
- ECR shall submit all proposed packaging and labeling to the commission prior to use

Cannabis Control Commission > My Licenses > Marijuana Retailer



Application #: MRN282565

Operating Policies and Procedures

You are required to provide documentation describing the Marijuana Establishment's policies and procedures for each of the following areas:

- Plan for obtaining marijuana or marijuana products
- Separating recreational from medical operations, if applicable
- Restricting Access to age 21 and older
- Security plan
- Prevention of diversion
- Storage of marijuana
- Transportation of marijuana
- Inventory procedures
- Quality control and testing
- Dispensing procedures
- Personnel policies including background checks
- Record Keeping procedures
- Maintaining of financial records
- Diversity plan
- Qualifications and training

Please upload a separate document for each of the areas listed. When uploading, identify the document by selecting the appropriate document type. Each document uploaded should address only one of the areas with no overlap between documents. Uploading the same document for multiple areas or omitting a document for any of the areas may require resubmitting your documents and delay the processing of your application.

Policies and Procedures Documentation *

Upload documentation for each area listed above. Select the appropriate document type to identify the file.

	Document Name: East Coast Remedies - Plan for Obtaining Marijuana or Marijuana Products.pdf	
	Document Category: Plan for obtaining marijuana or marijuana products	
	Upload Date: 4/4/19	
	Document Name: East Coast Remedies - Plan for Separating Recreational from Medical Operations.pdf	
	Document Category: Separating recreational from medical operations, if applicable	
	Upload Date: 4/4/19	
	Document Name: East Coast Remedies - Plan for Restricting Access to Age 21 and Older.pdf	
	Document Category: Restricting Access to age 21 and older	
	Upload Date: 4/4/19	
	Document Name: East Coast Remedies - Security Plan.pdf	
	Document Category: Security plan	
	Upload Date: 4/4/19	
	Document Name: East Coast Remedies - Prevention of Diversion.pdf	

	<p>Document Category: Prevention or diversion</p> <p>Document Name: East Coast Remedies - Storage of Marijuana.pdf</p> <p>Document Category: Storage of marijuana</p> <p>Upload Date: 4/4/19</p>	
	<p>Document Name: East Coast Remedies - Transportation of Marijuana.pdf</p> <p>Document Category: Transportation of marijuana</p> <p>Upload Date: 4/4/19</p>	
	<p>Document Name: East Coast Remedies - Inventory Procedures.pdf</p> <p>Document Category: Inventory procedures</p> <p>Upload Date: 4/4/19</p>	
	<p>Document Name: East Coast Remedies - Quality Control and Testing.pdf</p> <p>Document Category: Quality control and testing</p> <p>Upload Date: 4/4/19</p>	
	<p>Document Name: East Coast Remedies - Dispensing Procedures.pdf</p> <p>Document Category: Dispensing procedures</p> <p>Upload Date: 4/4/19</p>	
	<p>Document Name: East Coast Remedies - Personnel Policies Including Background Checks.pdf</p> <p>Document Category: Personnel policies including background checks</p> <p>Upload Date: 4/4/19</p>	
	<p>Document Name: East Coast Remedies - Recordkeeping Procedures.pdf</p> <p>Document Category: Record Keeping procedures</p> <p>Upload Date: 4/4/19</p>	
	<p>Document Name: East Coast Remedies - Maintaining of Financial Records.pdf</p> <p>Document Category: Maintaining of financial records</p> <p>Upload Date: 4/4/19</p>	
	<p>Document Name: East Coast Remedies - Diversity Plan.pdf</p> <p>Document Category: Diversity plan</p> <p>Upload Date: 4/4/19</p>	
	<p>Document Name: East Coast Remedies - Qualifications and Training.pdf</p> <p>Document Category: Qualifications and training</p> <p>Upload Date: 4/4/19</p>	

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East Coast Remedies Corp.

PLAN FOR OBTAINING MARIJUANA OR MARIJUANA PRODUCTS

East Coast Remedies Corp. ("East Coast Remedies") is currently not affiliated with any entity holding a license to cultivate marijuana or manufacture marijuana products in the Commonwealth of Massachusetts pursuant to 935 CMR 500.000 et seq. As such, East Coast Remedies plans to purchase marijuana and marijuana products from those entities licensed to cultivate and manufacture marijuana and marijuana products under 935 CMR 500.000 et seq. East Coast Remedies will ensure that all marijuana and marijuana products purchased from licensed marijuana cultivators and product manufacturers are in compliance with 935 CMR 500.160(9), requiring marijuana and marijuana products be tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160 prior to the sale or marketing for adult use of any such marijuana or marijuana product.

East Coast Remedies Corp.

PLAN FOR SEPARATING RECREATIONAL FROM MEDICAL OPERATIONS

East Coast Remedies Corp. ("East Coast Remedies") is not a Registered Marijuana Dispensary (RMD) and does not intend to conduct medical marijuana operations at the proposed facility. Should East Coast Remedies plan to operate a RMD at the proposed location, East Coast Remedies will receive all necessary approvals from the Cannabis Control Commission and develop plans to ensure virtual and physical separation between medical and adult use marijuana operations in accordance with 935 CMR 500.101(2)(e)(4).

East Coast Remedies Corp.

PLAN FOR RESTRICTING ACCESS TO AGE 21 AND OLDER

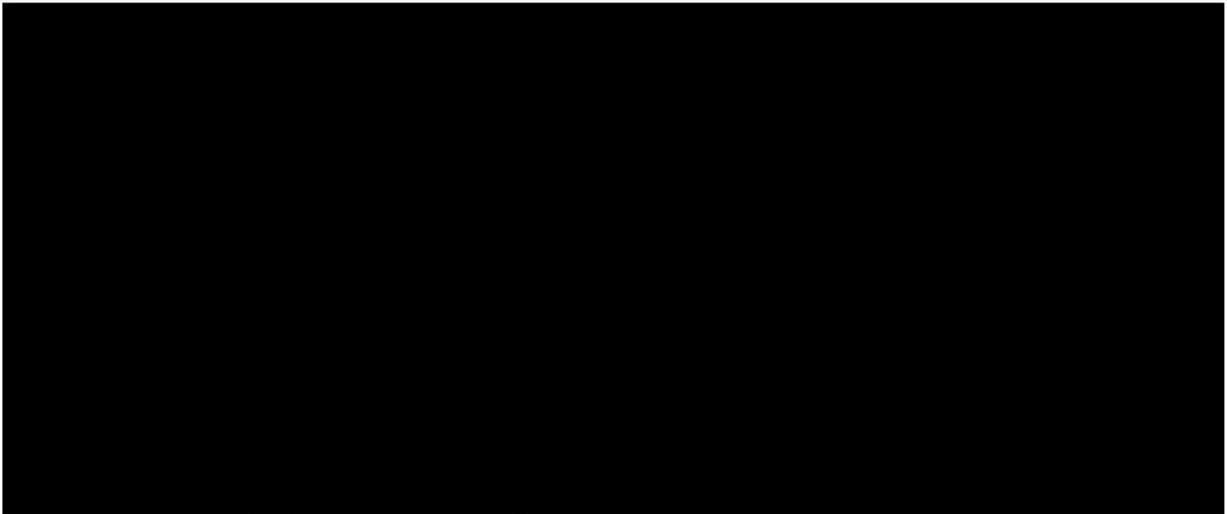
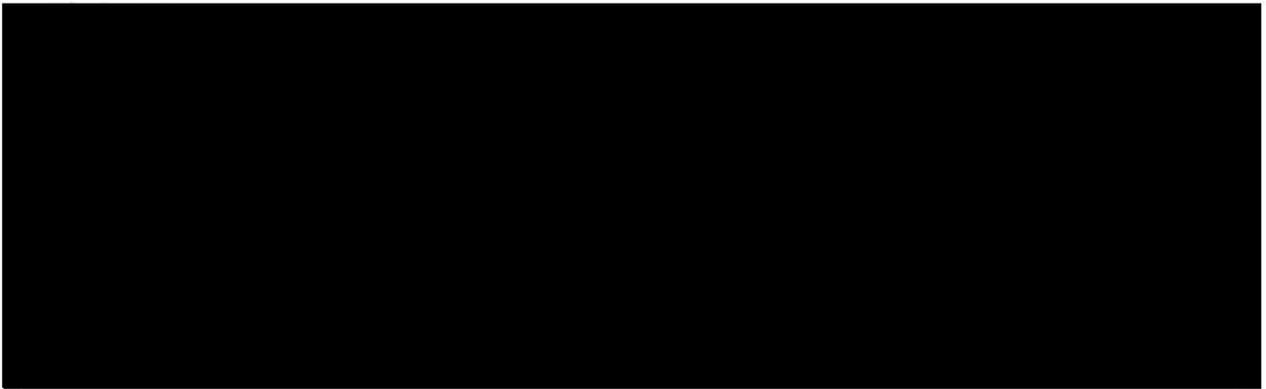
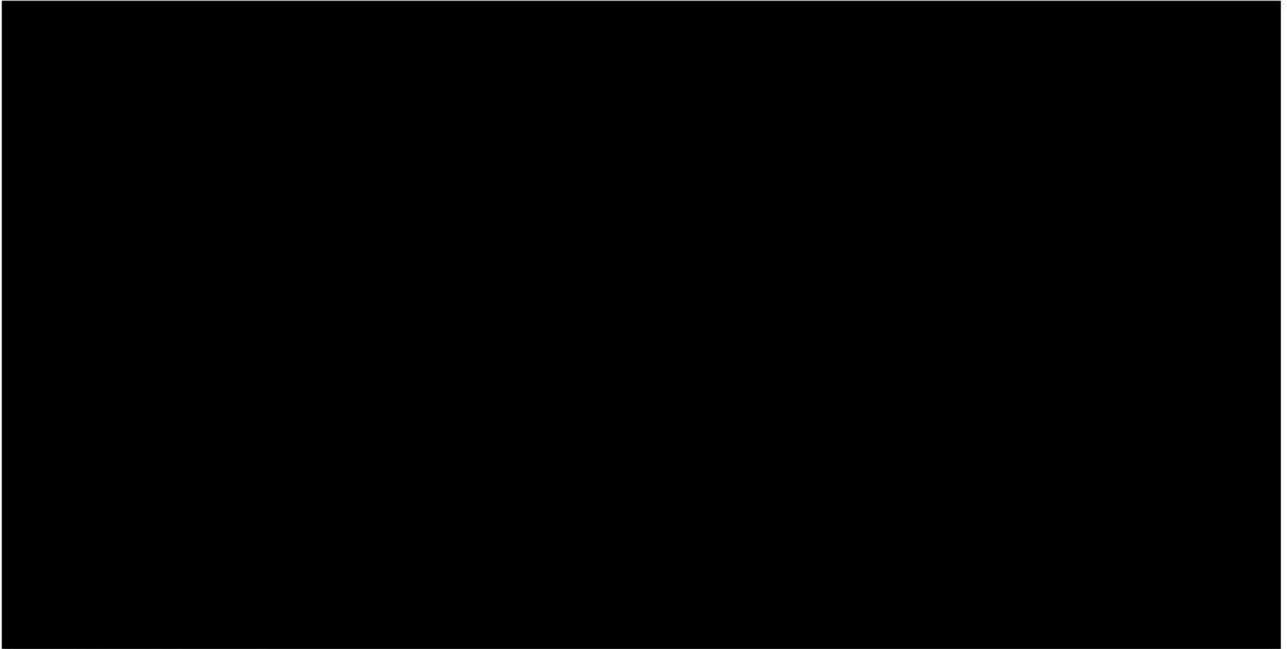
Pursuant to 935 CMR 500.050(5)(b), East Coast Remedies Corp. (“East Coast Remedies”) will only be accessible to consumers 21 years of age or older with a verified and valid, government-issued photo ID. Upon entry into the premises of the marijuana establishment by an individual, a East Coast Remedies agent will immediately inspect the individual’s proof of identification and determine the individual’s age, in accordance with 935 CMR 500.140(2).

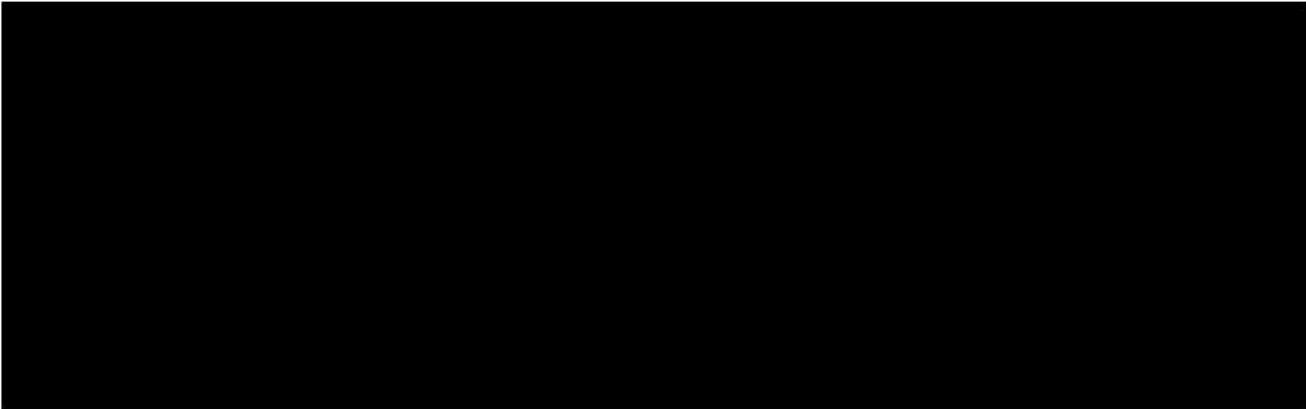
In the event East Coast Remedies discovers any of its agents intentionally or negligently sold marijuana to an individual under the age of 21, the agent will be immediately terminated, and the Commission will be promptly notified, pursuant to 935 CMR 500.105(1)(l). East Coast Remedies will not hire any individuals who are under the age of 21 or who have been convicted of distribution of controlled substances to minors, pursuant to 935 CMR 500.030(1).

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

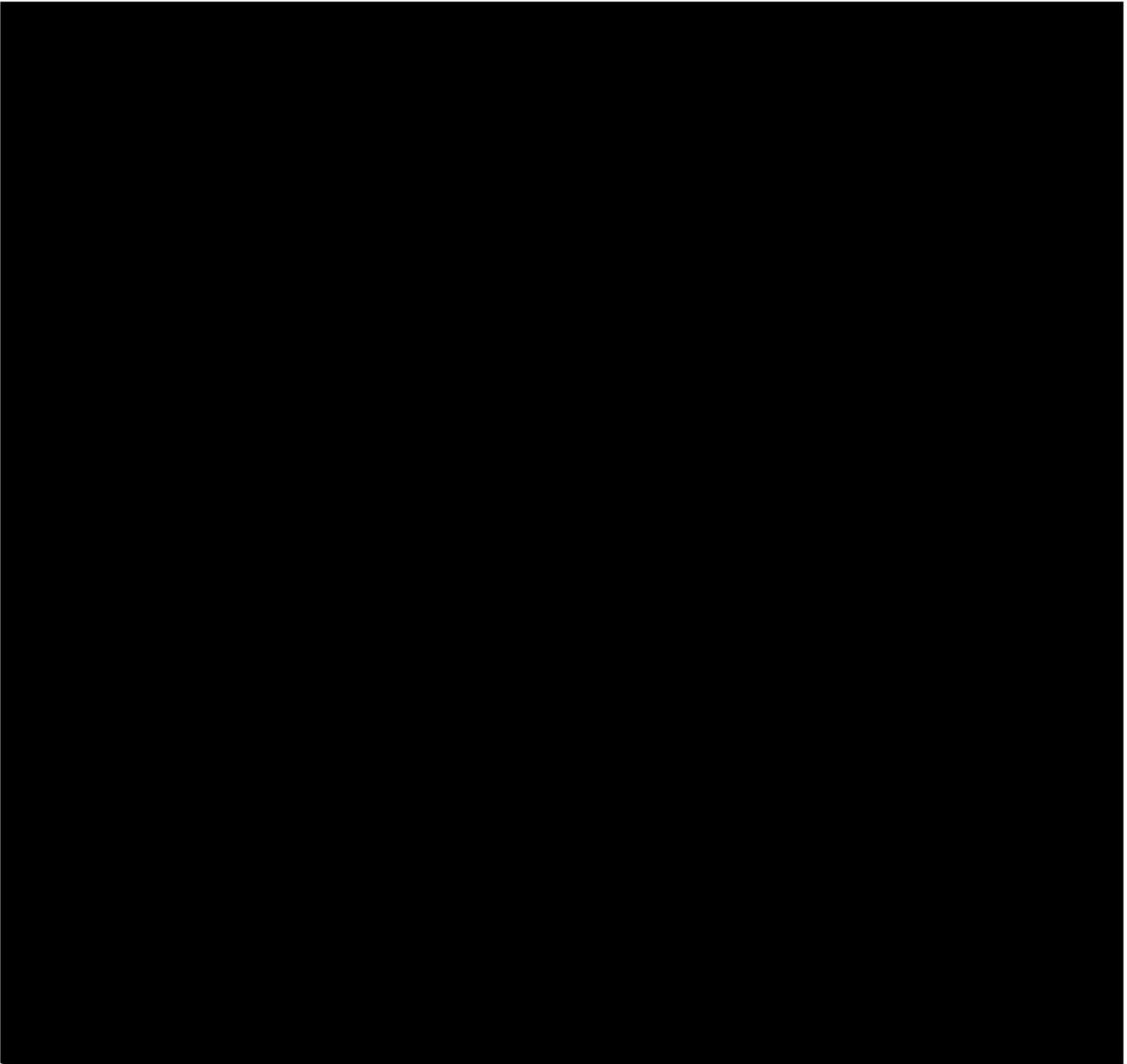
East Coast Remedies Corp.

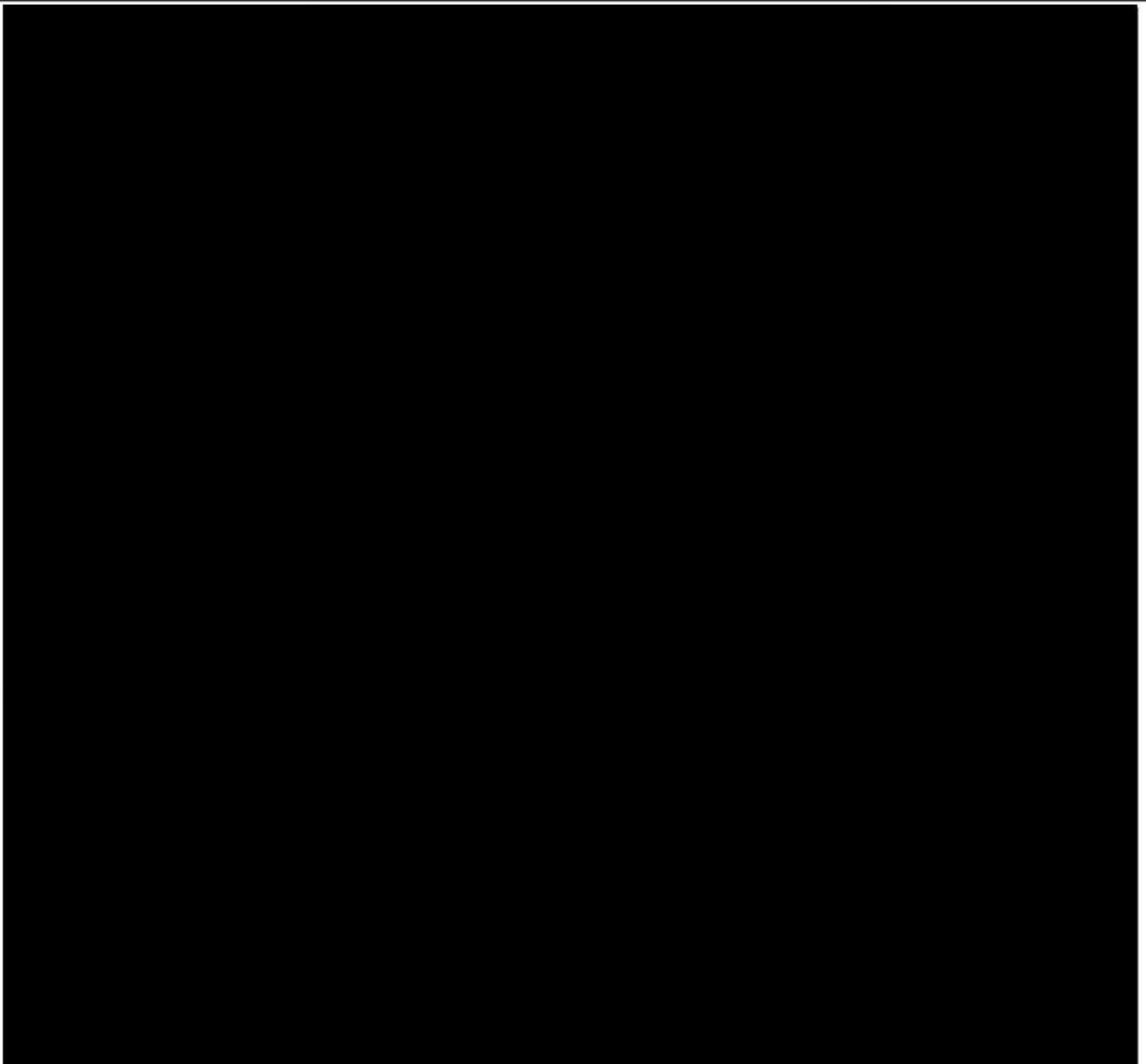
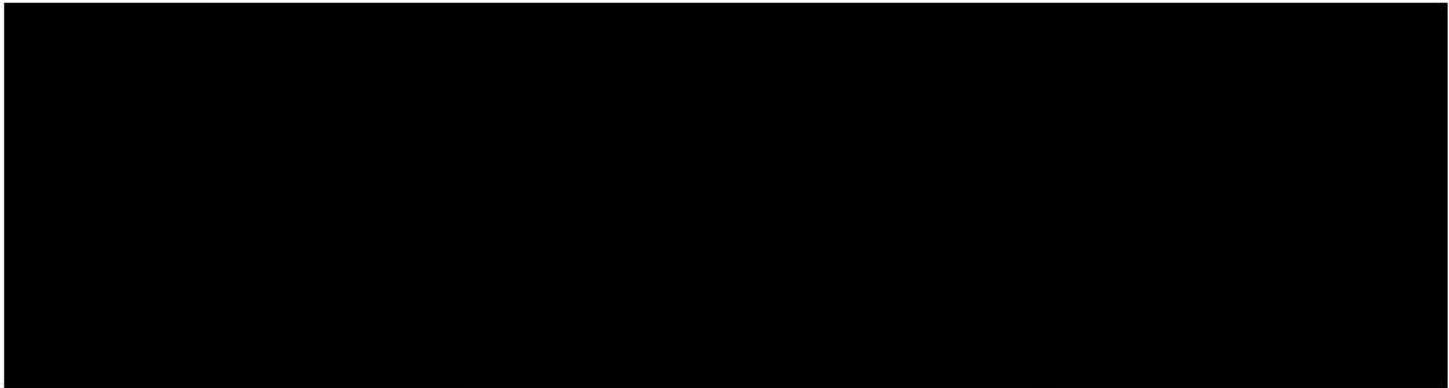
SECURITY PLAN





East Coast Remedies Corp.





East Coast Remedies Corp.

STORAGE OF MARIJUANA

East Coast Remedies Corp. (“East Coast Remedies”) will ensure that all marijuana and marijuana products are stored in compliance with 935 CMR 500.105(11). Specifically, East Coast Remedies will ensure the following:

- The facility will have adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110;
- The facility will have separate areas for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed, in accordance with applicable provision of 935 CMR 500.105(12);
- All storage areas will be maintained in a clean and orderly condition;
- All storage areas will be free from infestation by insects, rodents, birds, and pests of any kind; and
- All storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.

Per the requirements of 935 CMR 500.110, 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. Furthermore, all safes, vaults, and any other equipment or areas used for the storage of marijuana products will be securely locked and protected from entry, except for the actual time required to remove or replace marijuana.

The storage of finished products will be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers, per the requirements of 935 CMR 500.105(3)(b)(15).

In accordance with 935 CMR 500.105(3)(c), East Coast Remedies will comply with sanitary requirements. All edible products will be prepared, handled and stored in compliance with the sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*.

East Coast Remedies Corp.

TRANSPORTATION OF MARIJUANA

General Overview

East Coast Remedies Corp. ("East Coast Remedies") will ensure that all transported marijuana and products are properly tracked through seed-to-sale tracking software. East Coast Remedies will properly track and label all marijuana and marijuana products in the form and manner deemed acceptable by the Commission. East Coast Remedies will only transport marijuana from other licensed Marijuana Establishments as permitted by East Coast Remedies' license.

There will be no advertising, marketing or branding, including, but not limited to, vinyl-wrapped vehicles, signs, logos or markings, indicating that the vehicle is being used to transport marijuana on transportation vehicles or company cars.

In the event that any marijuana product is undeliverable or refused by the destination, East Coast Remedies will ensure that it will be transported back to the originating facility.

East Coast Remedies will staff all vehicles transporting marijuana and marijuana products with at least two East Coast Remedies agents, one of whom will remain in the vehicle at all times that the vehicle contains marijuana or marijuana products. Prior to departing the premises to transport marijuana products, East Coast Remedies will make a video record of weighing, inventorying, and accounting for all marijuana products to be transported.

When receiving transported marijuana, within eight hours after arrival, East Coast Remedies will re-weigh, re-inventory, and account for, on video, all marijuana and marijuana products received. When videotaping the weighing, inventorying, and accounting of marijuana and marijuana products before transportation or after receipt, East Coast Remedies will ensure that the video shows each product being weighed, the weight, and the manifest.

Prior to departure from its facility, East Coast Remedies will package marijuana and marijuana products in sealed, labeled, and tamper-resistant or child-resistant packaging, and ensure that marijuana and marijuana products remain as such during transportation.

All vehicles and transportation equipment used in the transportation of marijuana products requiring temperature control for safety must be designed, maintained, and equipped as necessary to provide adequate temperature control to prevent the marijuana or marijuana products from becoming unsafe during transportation, consistent with applicable requirements pursuant to 21 CFR 1.908(c). Any vehicle used to transport marijuana or marijuana products will be owned or leased by East Coast Remedies or a marijuana transporter, will be properly registered, inspected and insured in the Commonwealth, and equipped with an alarm system.

In the case of an emergency stop during the transportation of marijuana or marijuana products, East Coast Remedies will maintain a log describing the reason for the stop, the duration of the stop, the location of the stop, and any activities of its personnel exiting the vehicle.

East Coast Remedies will ensure that all routes used for the transportation of marijuana or marijuana products are randomized and remain within the Commonwealth.

Storage Requirements

East Coast Remedies will transport marijuana and marijuana products in secure, locked storage compartments that are a part of the vehicle transporting the marijuana products and cannot be easily removed. Storage and transportation of finished products will be under conditions that will protect them against physical, chemical, and microbial contamination, while also protecting against deterioration of finished products or their containers. Marijuana and marijuana products will not be visible from the outside of the vehicle. When transporting marijuana and marijuana products, no other products will be transported or stored in the vehicle nor will firearms be located in the vehicle or on transporting agents.

Communications

Any vehicle used by East Coast Remedies to transport marijuana and marijuana products will contain a global positioning system (GPS) monitoring device that is: 1) not a mobile device that is easily removable; 2) attached to the vehicle at all times that the vehicle contains marijuana and marijuana products; and 3) monitored by East Coast Remedies during transport of marijuana and marijuana products. East Coast Remedies will obtain an inspection from the Commission prior to initial transportation of marijuana and marijuana products and after any alteration to the locked storage compartment.

Each East Coast Remedies agent transporting marijuana products will have access to a secure form of communication with personnel at East Coast Remedies at all times that the vehicle contains marijuana and marijuana products. East Coast Remedies will utilize either two-way digital or analog radio, cellular phones, or satellite phones for these purposes dependent upon the transportation area, base capabilities, cellular signal coverage, antenna coverage, and frequency of transportation.

Prior to and immediately after leaving East Coast Remedies premises, East Coast Remedies agents will be required to use a secure form of communication to contact agents at the East Coast Remedies facility to test communications and GPS operability. In the event that communications or the GPS system fail while on route, the East Coast Remedies agents transporting marijuana or marijuana products must return to the originating East Coast Remedies location until the communication system or GPS system is once again operational.

Marijuana establishment agents transporting marijuana or marijuana products will be required to contact the East Coast Remedies facility when stopping at and leaving any scheduled location, and regularly throughout the trip, at least every 30 minutes.

East Coast Remedies will ensure that there is a East Coast Remedies agent assigned to monitoring the GPS unit and secure form of communication, who will be required to log all official communications with marijuana establishment agents transporting marijuana products. All manifests used in the transportation of marijuana will be filled out in triplicate, with the original manifest remaining with the originating facility, a second copy provided to the destination marijuana establishment upon arrival, and a copy to be kept with the agent during transportation and returned to the marijuana establishment or marijuana transporter upon completion of the transportation. The manifest will be securely transmitted to the destination marijuana establishment via facsimile or email prior to departure.

Upon arrival at the destination marijuana establishment, agents will compare the manifest and the copy transmitted by facsimile or email to the destination marijuana establishment. Each manifest will include, at a minimum, the originating marijuana establishment name, address, and registration number; the names and registration numbers of the agents who transported the marijuana products; the name and registration number of the marijuana establishment agent who prepared the manifest; the destination marijuana establishment name, address, and registration number; a description of the marijuana and marijuana products being transported, including the weight and form or type of the product; the mileage of the transporting vehicle at departure from East Coast Remedies and mileage upon arrival at destination marijuana establishment, as well as mileage upon return to East Coast Remedies; the date and time of departure from East Coast Remedies and arrival at destination marijuana establishment for each transportation; a signature line for the marijuana establishment agent who receives the marijuana products; the weight and inventory before departure and upon receipt; the date and time that the transported products were re-weighed and re-inventoried; the name of the marijuana establishment agent at the destination marijuana establishment who re-weighed and re-inventoried products; and the vehicle make, model, and license plate number.

East Coast Remedies will maintain the manifest inside of its vehicle throughout the entire transportation process until delivery is complete. All transportation manifests will be retained by East Coast Remedies for a minimum of one year and will be available for inspection by the Commission upon request.

Should any unusual discrepancy occur in weight or inventory, East Coast Remedies agents will document and report the discrepancy to the Commission and law enforcement authorities not more than 24 hours after the discovery of such a discrepancy. East Coast Remedies agents will report to the Commission and law enforcement authorities any vehicle accidents, diversions, losses, or other reportable incidents that occur during transport, not more than 24 hours after such accidents, diversions, losses, or other reportable incidents.

Each agent transporting or otherwise handling marijuana or marijuana products for East Coast Remedies will be registered as a marijuana establishment agent and have a driver's license in good standing issued by the Massachusetts Registry of Motor Vehicles for all classes of vehicle the marijuana establishment agent will operate for East Coast Remedies prior to transporting or otherwise handling East Coast Remedies' marijuana or marijuana products.

All East Coast Remedies agents will carry their registration cards at all times when transporting marijuana or marijuana products for East Coast Remedies and will produce their registration card to the Commission or law enforcement officials upon request. East Coast Remedies will use best management practices to reduce energy and water usage, engage in energy conservation, and mitigate other environmental impacts wherever possible.

Representatives of the Commission, other Commonwealth agencies, and emergency responders responding in the course of an emergency will have access to all East Coast Remedies transportation vehicles as necessary.

East Coast Remedies Corp.

INVENTORY PROCEDURES

East Coast Remedies Corp. ("East Coast Remedies") will maintain real-time inventory in compliance with 935 CMR 500.105(8), including maintaining inventory of marijuana and marijuana products, and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal. All marijuana and marijuana products will be tagged and tracked within East Coast Remedies' seed-to-sale tracking system.

East Coast Remedies will utilize a real-time seed-to-sale tracking system, which will provide the electronic tracking of marijuana and marijuana products and final. East Coast Remedies' tracking system will utilize unique batch identification numbers to accurately track inventory.

East Coast Remedies will:

- Establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of marijuana and marijuana products;
- Conduct a monthly inventory of marijuana and marijuana products;
- Conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and
- Promptly transcribe inventories if taken by use of an oral recording device.

The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory. All inventory records will be kept in accordance with East Coast Remedies' record keeping procedures. East Coast Remedies' agents will document and East Coast Remedies will report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours after the discovery of such a discrepancy.

East Coast Remedies will only sell and market inventory that is capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

East Coast Remedies Corp.

QUALITY CONTROL AND TESTING

Quality Control

East Coast Remedies Corp. ("East Coast Remedies") will comply with the following sanitary requirements:

1. Any East Coast Remedies agent whose job includes contact with marijuana or nonedible marijuana products is subject to the requirements for food handlers specified in 105 CMR 300.000, and all edible marijuana products will be handled and stored in compliance with the sanitation requirements in 105 CMR 500.000, and with the requirements for food handlers specified in 105 CMR 300.000.
2. Any East Coast Remedies agent working in direct contact with marijuana or nonedible marijuana products will conform to sanitary practices while on duty, including:
 - a. Maintaining adequate personal cleanliness; and
 - b. Washing hands thoroughly in an adequate hand-washing area before starting work, and at any other time when hands may have become soiled or contaminated.
3. East Coast Remedies' hand-washing facilities will be adequate and convenient and will be furnished with running water at a suitable temperature. Hand-washing facilities will be located in East Coast Remedies' production areas and where good sanitary practices require employees to wash and sanitize their hands, and will provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
4. East Coast Remedies' facility will have sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
5. East Coast Remedies will ensure that litter and waste is properly removed and disposed of so as to minimize the development of odor and minimize the potential for the waste attracting and harboring pests. The operating systems for waste disposal will be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
6. East Coast Remedies' floors, walls, and ceilings will be constructed in such a manner that they may be adequately kept clean and in good repair;
7. East Coast Remedies' facility will have adequate safety lighting in all storage areas;
8. East Coast Remedies' buildings, fixtures, and other physical facilities will be maintained in a sanitary condition;
9. East Coast Remedies will ensure that all contact surfaces will be maintained in a clean and sanitary condition. Such surfaces will be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions;
10. All toxic items will be identified, held, and stored in a manner that protects against contamination of marijuana products;
11. East Coast Remedies will ensure that its water supply is sufficient for necessary operations, and that such water supply is safe and potable;
12. East Coast Remedies' plumbing will be of adequate size and design, and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the marijuana establishment. Plumbing will properly convey sewage and liquid disposable waste from the marijuana establishment. There will be no cross-connections between the potable and waste water lines;

13. East Coast Remedies will provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
14. East Coast Remedies will hold all products that can support the rapid growth of undesirable microorganisms in a manner that prevents the growth of these microorganisms; and
15. East Coast Remedies will store and transport finished products under conditions that will protect them against physical, chemical, and microbial contamination, as well as against deterioration of finished products or their containers.

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

East Coast Remedies will ensure that East Coast Remedies' facility is always maintained in a sanitary fashion and will comply with all applicable sanitary requirements.

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

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

Testing

East Coast Remedies will not sell or otherwise market marijuana or marijuana products that are not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000. No marijuana product will be sold or otherwise marketed for adult use that has not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160. Testing of East Coast Remedies' marijuana products will be performed by an Independent Testing Laboratory in compliance with the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products, as amended in November 2016, published by the DPH.

East Coast Remedies' policy of responding to laboratory results that indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1) include notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. Such

notification will describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.

East Coast Remedies will maintain testing results in compliance with 935 CMR 500.000 *et seq* and the record keeping policies described herein and will maintain the results of all testing for no less than one year.

All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services will comply with 935 CMR 500.105(13). All storage of East Coast Remedies' marijuana at a laboratory providing marijuana testing services will comply with 935 CMR 500.105(11). All excess marijuana will be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to East Coast Remedies for disposal or by the Independent Testing Laboratory disposing of it directly.

East Coast Remedies Corp.

DISPENSING PROCEDURES

In accordance with 935 CMR 500.140(3), access to East Coast Remedies Corp.'s ("East Coast Remedies") facility is limited to individuals 21 years of age and older. Upon a customer's entry into East Coast Remedies' premises, a East Coast Remedies agent will immediately inspect the customer's proof of identification and determine the individual's age. An individual will not be admitted to the premises unless the retailer has verified that the individual is 21 years of age or older by an individual's proof of identification. At the door, a designated staff member will collect valid customer identification and confirm a minimum age of 21 years old, failing the confirmation of 21 years of age or older, an individual will be prohibited from entering the premises.

Once inside the retail area, customers will enter a queue to obtain individualized service where they may select any of the products available to them with the help of a East Coast Remedies agent. Upon checkout, customers will be required to confirm their identities and age a second time. Check out also activates the seed-to-sale tracking system that is compliant with 935 CMR 500.105(8).

Per M.G.L. c. 94G § 7, sales are limited to one ounce of marijuana flower or five grams of marijuana concentrate per transaction. All required taxes will be collected at the point of sale.

Once a customer has selected a product for purchase, a East Coast Remedies agent will collect the chosen items from the designated product storage area. A East Coast Remedies agent will then scan each product barcode into the point of sale system. In the event of a flower sale, staff will weigh the chosen amount of flower and then place it in a tamper-resistant/child-resistant, resealable package that is compliant with 935 CMR 500.105(5). A East Coast Remedies agent will affix a label, as generated by the point of sale system, indicating the date, strain name, cannabinoid profile, and all applicable warnings detailed in 935 CMR 500.105.

In the event a East Coast Remedies agent determines an individual would place themselves or the public at risk, the agent will refuse to sell any marijuana products to the consumer. East Coast Remedies will use the point of sale security system to accept payment and complete sales. The system can back up and securely cache each sale for inspection.

Pursuant to 935 CMR 500.140(6)(d), East Coast Remedies will conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data. If any such malware is found, East Coast Remedies will immediately report the occurrence to the Commission and assist in any subsequent investigation into the matter. East Coast Remedies will maintain a record of the monthly analyses and will make it available for inspection by the Commission upon request. Further, East Coast Remedies will cooperate with the Commission and the Department of Revenue to ensure compliance with any and all taxes in accordance with the laws of the Commonwealth and 935 CMR 500.000.

East Coast Remedies places a premium on cleanliness, hygiene, and proper product storage to achieve and maintain successful operation of the business. In addition to regularly sanitizing

surfaces with products kept separately and away from marijuana products, East Coast Remedies staff will ensure personal hygiene including washing hands throughout the day and before handling or dispensing any marijuana products. All products available for sale and consumption will be tested for impurities and subjected to East Coast Remedies' policies governing quality control per 935 CMR 500.105.

In compliance with 935 CMR 5001.140(8), East Coast Remedies will provide educational materials designed to help consumers make informed marijuana product purchases. East Coast Remedies' educational materials will describe the varying types of products available at East Coast Remedies, as well as the types and methods of consumption. The materials will offer education on cannabis titration: the method of using the smallest amount of a given marijuana product necessary to bring about the desired effect. Additional topics discussed in consumer materials will include potency; proper dosing; the delayed effects of edible marijuana products; and substance abuse and related treatment programs, marijuana tolerance, dependence, and withdrawal.

East Coast Remedies Corp.

PERSONNEL POLICIES INCLUDING BACKGROUND CHECKS

Overview

East Coast Remedies Corp. ("East Coast Remedies") will securely maintain personnel records, including registration status and background check records. East Coast Remedies will keep, at a minimum, the following personnel records:

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

Agent Personnel Records

Personnel records for each agent will be maintained for at least twelve (12) months after termination of the agent's affiliation with East Coast Remedies and will include, at a minimum, the following:

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

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

Agent Background Checks

- In addition to completing the Commission's agent registration process, all agents hired to work for East Coast Remedies will undergo a detailed background investigation prior to being granted access to a East Coast Remedies facility or beginning work duties.
- Background checks will be conducted on all agents in their capacity as employees or volunteers for East Coast Remedies pursuant to 935 CMR 500.100 and will be used by the Director of Security, who will be registered with the Department of Criminal Justice Information Systems pursuant to 803 CMR 2.04: iCORI Registration and the Commission for purposes of determining the suitability of individuals for registration as a marijuana establishment agent with the licensee.

- For purposes of determining suitability based on background checks performed in accordance with 935 CMR 500.101(1), East Coast Remedies will consider:
 - a. All conditions, offenses, and violations are construed to include Massachusetts law or like or similar law(s) of another state, the United States or foreign jurisdiction, a military, territorial or Native American tribal authority, or any other jurisdiction.
 - b. All criminal disqualifying conditions, offenses, and violations include the crimes of attempt, accessory, conspiracy, and solicitation. Juvenile dispositions will not be considered as a factor for determining suitability.
 - c. Where applicable, all look-back periods for criminal conditions, offenses, and violations included in 935 CMR 500.802 commence upon the date of disposition; provided, however, that if disposition results in incarceration in any institution, the look-back period will commence upon release from incarceration.
- Suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800. In addition to the requirements established in 935 CMR 500.800, East Coast Remedies will:
 - a. Comply with all guidance provided by the Commission and 935 CMR 500.802: Tables B through D to determine if the results of the background are grounds for Mandatory Disqualification or Presumptive Negative Suitability Determination.
 - b. Consider whether offense(s) or information that would result in a Presumptive Negative Suitability Determination under 935 CMR 500.802. In the event a Presumptive Negative Suitability Determination is made, East Coast Remedies will consider the following factors:
 - i. Time since the offense or incident;
 - ii. Age of the subject at the time of the offense or incident;
 - iii. Nature and specific circumstances of the offense or incident;
 - iv. Sentence imposed and length, if any, of incarceration, if criminal;
 - v. Penalty or discipline imposed, including damages awarded, if civil or administrative;
 - vi. Relationship of offense or incident to nature of work to be performed;
 - vii. Number of offenses or incidents;
 - viii. Whether offenses or incidents were committed in association with dependence on drugs or alcohol from which the subject has since recovered;
 - ix. If criminal, any relevant evidence of rehabilitation or lack thereof, such as information about compliance with conditions of parole or probation, including orders of no contact with victims and witnesses, and the subject's conduct and experience since the time of the offense including, but not limited to, professional or educational certifications obtained; and
 - x. Any other relevant information, including information submitted by the subject.
 - c. Consider appeals of determinations of unsuitability based on claims of erroneous information received as part of the background check during the application process in accordance with 803 CMR 2.17: Requirement to Maintain a Secondary

Dissemination Log and 2.18: Adverse Employment Decision Based on CORI or Other Types of Criminal History Information Received from a Source Other than the DCJIS.

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

East Coast Remedies Corp.

RECORDKEEPING PROCEDURES

General Overview

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

Recordkeeping

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

- Corporate Records: are defined as those records that require, at a minimum, annual reviews, updates, and renewals, including:
 - Insurance Coverage:
 - Directors & Officers Policy
 - Product Liability Policy
 - General Liability Policy
 - Umbrella Policy
 - Workers Compensation Policy
 - Employer Professional Liability Policy
 - Third-Party Laboratory Contracts
 - Commission Requirements:
 - Annual Agent Registration
 - Annual Marijuana Establishment Registration
 - Local Compliance:
 - Certificate of Occupancy
 - Special Permits
 - Variances
 - Site Plan Approvals
 - As-Built Drawings
 - Corporate Governance:
 - Annual Report
 - Secretary of State Filings
- Business Records: Records that require ongoing maintenance and updates. These records can be electronic or hard copy (preferably electronic) and at minimum include:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products;

- Salary and wages paid to each agent, and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with East Coast Remedies, including members, if any.
- Personnel Records: At a minimum will include:
 - Job descriptions for each agent and volunteer position, as well as organizational charts consistent with the job descriptions;
 - A personnel record for each marijuana establishment agent. Such records will be maintained for at least twelve (12) months after termination of the agent's affiliation with East Coast Remedies and will include, at a minimum, the following:
 - All materials submitted to the Commission pursuant to 935 CMR 500.030(2);
 - Documentation of verification of references;
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - Documentation of periodic performance evaluations; and
 - A record of any disciplinary action taken.
 - Notice of completed responsible vendor and eight-hour related duty training.
 - A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
 - Personnel policies and procedures; and
 - All background check reports obtained in accordance with 935 CMR 500.030.
- Handling and Testing of Marijuana Records
 - East Coast Remedies will maintain the results of all testing for a minimum of one (1) year.
- Inventory Records
 - The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the agents who conducted the inventory.
- Seed-to-Sale Tracking Records
 - East Coast Remedies will use seed-to-sale tracking software to maintain real-time inventory. The seed-to-sale tracking software inventory reporting will meet the requirements specified by the Commission and 935 CMR 500.105(8)(c) and (d), including, at a minimum, an inventory of marijuana and marijuana products, and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
 - Inventory records will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.
- Incident Reporting Records

- Within ten (10) calendar days, East Coast Remedies will provide written notice to the Commission of any incident described in 935 CMR 500.110(7)(a), by submitting an incident report, detailing the incident, the investigation, the findings, resolution (if any), confirmation that the Police Department and Commission were notified within twenty-four (24) hours of discovering the breach, and any other relevant information. Reports and supporting documents, including photos and surveillance video related to a reportable incident, will be maintained by East Coast Remedies for no less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities upon request.
- Visitor Records
 - A visitor sign-in and sign-out record will be maintained at the security office. The record will include the visitor's name, address, organization or firm, date, time in and out, and the name of the authorized agent who will be escorting the visitor.
- Waste Disposal Records
 - When marijuana or marijuana products are disposed of, East Coast Remedies will create and maintain a written record of the date, the type and quantity disposed of or handled, the manner of disposal or other handling, the location of disposal or other handling, and the names of the two East Coast Remedies agents present during the disposal or handling, with their signatures. East Coast Remedies will keep disposal records for at least three (3) years. This period will automatically be extended for the duration of any enforcement action and may be extended by an order of the Commission.
- Security Records
 - A current list of authorized agents and service personnel that have access to the surveillance room will be available to the Commission upon request.
 - Twenty-four (24) hour recordings from all video cameras that are available for immediate viewing by the Commission upon request and that are retained for at least ninety (90) calendar days.
- Transportation Records
 - East Coast Remedies will retain all shipping manifests for a minimum of one (1) year and make them available to the Commission upon request.
- Agent Training Records
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and a signed statement of the individual indicating the date, time, and place he or she received the training, the topics discussed and the name and title of the presenter(s).
- Closure
 - In the event East Coast Remedies closes, all records will be kept for at least two (2) years at East Coast Remedies' expense in a form (electronic, hard copies, etc.) and location acceptable to the Commission. In addition, East Coast Remedies will communicate with the Commission during the closure process and accommodate any additional requests the Commission or other agencies may have.
- Written Operating Policies and Procedures: Policies and Procedures related to East Coast Remedies' operations will be updated on an ongoing basis as needed and undergo a

review by the executive management team on an annual basis. Policies and Procedures will include the following:

- Security measures in compliance with 935 CMR 500.110;
- Agent security policies, including personal safety and crime prevention techniques;
- A description of East Coast Remedies' hours of operation and after-hours contact information, which will be provided to the Commission, made available to law enforcement officials upon request, and updated pursuant to 935 CMR 500.000.
- Storage of marijuana in compliance with 935 CMR 500.105(11);
- Description of the various strains of marijuana to be sold, and the form(s) in which marijuana will be dispensed;
- Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.160;
- Plans for quality control, including product testing for contaminants in compliance with 935 CMR 500.160;
- A staffing plan and staffing records in compliance with 935 CMR 500.105(9);
- Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;
- Alcohol, smoke, and drug-free workplace policies;
- A plan describing how confidential information will be maintained;
- Policy for the immediate dismissal of any dispensary agent who has:
 - Diverted marijuana, which will be reported to the Police Department and to the Commission;
 - Engaged in unsafe practices with regard to East Coast Remedies operations, which will be reported to the Commission; or
 - Been convicted or entered a guilty plea, plea of *nolo contendere*, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of another state, the United States or a foreign jurisdiction, or a military, territorial, or Native American tribal authority.
- A list of all executives of East Coast Remedies, and members, if any, of the licensee must be made available upon request by any individual. 935 CMR 500.105(1)(m) requirement may be fulfilled by placing this information on East Coast Remedies' website.
- Policies and procedures for the handling of cash on East Coast Remedies premises including but not limited to storage, collection frequency and transport to financial institution(s).
- Policies and procedures to prevent the diversion of marijuana to individuals younger than 21 years old.
- Policies and procedures for energy efficiency and conservation that will include:
 - Identification of potential energy use reduction opportunities (including but not limited to natural lighting, heat recovery ventilation and energy efficiency measures), and a plan for implementation of such opportunities;
 - Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy

generators could be placed on site, and an explanation of why the identified opportunities were not pursued, if applicable;

- Strategies to reduce electric demand (such as lighting schedules, active load management and energy storage); and
- Engagement with energy efficiency programs offered pursuant to M.G.L. c. 25 § 21, or through municipal lighting plants.

Record-Retention

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

East Coast Remedies Corp.

MAINTAINING OF FINANCIAL RECORDS

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

- Confidential information will be maintained in a secure location, kept separate from all other records, and will not be disclosed without the written consent of the individual to whom the information applies, or as required under law or pursuant to an order from a court of competent jurisdiction; provided however, the Commission may access this information to carry out its official duties.
- All recordkeeping requirements under 935 CMR 500.105(9) are followed, including:
 - Keeping written business records, available for inspection, and in accordance with generally accepted accounting principles, which will include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which will include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of marijuana products; and
 - Salary and wages paid to each employee and any executive compensation, bonus, benefit, or item of value paid to any individual affiliated with a marijuana establishment, including members, if any.
- All sales recording requirements under 935 CMR 500.140(6) are followed, including:
 - Utilizing a point-of-sale (POS) system approved by the Commission, in consultation with the DOR, and a sales recording module approved by DOR;
 - Conducting a monthly analysis of its sales data, and maintaining records, available to the Commission upon request, that the monthly analysis has been performed;
 - Complying with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements;
 - Adopting separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales; and
 - Maintaining such records that would allow for the Commission and the DOR to audit and examine the point-of-sale system used in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.
- Additional written business records will be kept, including, but not limited to, records of:
 - Compliance with liability insurance coverage or maintenance of escrow requirements under 935 CMR 500.105(10) and all bond or escrow requirements under 935 CMR 500.105(16);
 - Fees paid under 935 CMR 500.005 or any other section of the Commission's regulations; and
 - Fines or penalties, if any, paid under 935 CMR 500.550 or any other section of the Commission's regulations.

DIVERSITY GOALS

East Coast Remedies is an equal opportunity employer. As an economic empowerment collaborative it is our mission to build a team of diverse individuals from various backgrounds, perspectives and identities. To accomplish this goal ECR shall provide employment opportunities for individuals of all races, religions, genders, colors, age, sexual preference or military practice, without discrimination.

- Form a hiring process recruiting team members from diverse backgrounds, perspectives and identities.
- Providing career building opportunities, training and education to minorities
- Offering employment opportunities including but not limited to, hiring, benefits, promotion, salary and other conditions of employment.
- Create a work environment that encourages those of all walks of life, a diverse team that feels valued in our company.
- Encourage management opportunities to above mentioned demographics
- Implement fair compensation practices for all employees

DIVERSITY PROGRAMS

- Provide the training needed for all new employees educating those on our values, culture and diversity within the workplace.
- Implement employee development programs and ongoing training to help build employees knowledge of the marijuana industry.
- Provide employees opportunities to participate in further education events such as conferences, courses and seminars.
- Offering various benefits to our employees including but not limited to product discounts, vacation time, daycare services and marijuana event travel opportunities.
- Provide the tools and education needed to assist employees interested in furthering their careers in the marijuana industry.

East Coast Remedies Corp.

QUALIFICATIONS AND TRAINING

East Coast Remedies Corp. ("East Coast Remedies") will ensure that all employees hired to work at an East Coast Remedies facility will be qualified to work as a marijuana establishment agent and properly trained to serve in their respective roles in a compliant manner.

Qualifications

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

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

Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of East Coast Remedies' agents will successfully complete a comprehensive training program that is tailored to the roles and responsibilities of the agent's job function. Agent training will at least include the Responsible Vendor Program and eight (8) hours of on-going training annually.

On or after July 1, 2019, all of East Coast Remedies' current owners, managers, and employees will have attended and successfully completed a Responsible Vendor Program operated by an education provider accredited by the Commission to provide the annual minimum of two hours of responsible vendor training to marijuana establishment agents. East Coast Remedies' new, non-administrative employees will complete the Responsible Vendor Program within 90 days of the date they are hired. East Coast Remedies' owners, managers, and employees will then successfully complete the program once every year thereafter. East Coast Remedies will also encourage administrative employees who do not handle or sell marijuana to take the responsible vendor program on a voluntary basis to help ensure compliance. East Coast Remedies' records of responsible vendor training program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other state licensing authority upon request.

As part of the Responsible Vendor program, East Coast Remedies' agents will receive training on a variety of topics relevant to marijuana establishment operations, including but not limited to the following:

1. Marijuana's effect on the human body, including physical effects based on different types of marijuana products and methods of administration, and recognizing the visible signs of impairment;
2. Best practices for diversion prevention and prevention of sales to minors;
3. Compliance with tracking requirements;

4. Acceptable forms of identification, including verification of valid photo identification and confiscation of fraudulent identifications;
5. Such other areas of training determined by the Commission to be included; and
6. Other significant state laws and rules affecting operators, such as:
 - Local and state licensing and enforcement;
 - Incident and notification requirements;
 - Administrative and criminal liability and license sanctions and court sanctions;
 - Waste disposal and health and safety standards;
 - Patrons prohibited from bringing marijuana onto licensed premises;
 - Permitted hours of sale and conduct of establishment;
 - Permitting inspections by state and local licensing and enforcement authorities;
 - Licensee responsibilities for activities occurring within licensed premises;
 - Maintenance of records and privacy issues; and
 - Prohibited purchases and practices.