

Section 3: Responses to Application Questions

Revolutionary Clinics: Retail Adult-Use License Application for 67 Broadway, Somerville

1. Describe how the Applicant will help monitor the health impacts of recreational marijuana in their neighborhood and on local youth.

- a. There are many reasons why Revolutionary Clinics was voted the ***Best Medical Dispensary in New England*** at NECANN on March 22, 2019. Our operations are the best in the business. We have the amazing people, an outstanding customer experience, top-notch customer service, a full spectrum of premium products, a welcoming environment, dynamic educational offerings, tireless advocacy, generous affinity programs and a fervent passion for helping others. These are the reasons why RC is a great partner to the City of Somerville. We are committed to negating the negative impacts of recreational marijuana on the neighborhood and local youth.
- b. RC has created a Community Advisory Board (CAB) and donated \$10,000 to the CAB to support the local community and proactively address the health impacts of recreational marijuana in East Somerville, local youth and beyond. We will work closely with all groups to ensure we are fulfilling our mission of being a great neighbor and positively impacting the community. The CAB will be a conduit to the community to hear their concerns and address issues. CAB members include: East Somerville Main Streets (which we are also an annual sponsor), Teen Empowerment, The Welcome Project, Somerville Homeless Coalition (Project Soup), Groundwork Somerville, and other members are pending. A primary objective of the CAB is to monitor the health impacts of recreational marijuana in the neighborhood and on local youth and to proactively do all we can to mitigate any negative impacts on the community, especially youth and those at-risk of addiction.
- c. We will be available to work with the Somerville Department of Health and Human Services to assist in their efforts to help mitigate negative effects however we can.
- d. Rev Clinics has a detailed strategy to inform customers about restrictions on public consumption and workplace use, the risks of second-hand smoke, and dangers of operating a motor vehicle impaired.

2. 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.

- a. Rev Clinics has a detailed strategy to prevent abuse and diversion and to educate youth and families about the dangers of underage exposure to, and the consumption of, recreational marijuana. This strategy includes:
 - i. Educational events with partners and experts such as the Massachusetts Patients Advocacy Alliance, MCR Labs, C3RN, The Green Nurse Group, Alternative Treatment for Veterans and other veterans' organizations, and many

other groups. We make every effort to reach a large audience to address responsible use and the risks and warnings associated with cannabis use.

- ii. Rev Clinics works with these partners to hold off-site educational events to educate patients, consumers, and the general public about cannabis; including the dangers of underage exposure to, and the consumption of, recreational marijuana.
- iii. We provide educational materials to all that ask that provide strategies on:
 - 1. How to talk to you kids about marijuana
 - 2. Why minors must avoid marijuana
 - 3. The risks of marijuana use
 - 4. Safe storage of marijuana strategies
 - 5. What to do in case of accidental ingestion of marijuana
- b. RC's Community Advisory Board is another vehicle we use to educate the public through partner outreach and education through programs we fund. The CAB will allow us to proactively monitor and address the health impacts of recreational marijuana on local youth in East Somerville and beyond.
 - i. We work with nonprofits who are represented in our Community Advisory Board, including: East Somerville Main Streets, Teen Empowerment, Groundwork Somerville and The Welcome Project to help monitor the effects of cannabis on youth and the local community and to provide education and outreach to these groups in an effort to keep cannabis off the streets and away from kids.
- c. Our website, www.RevClinics.com has detailed warnings, legal info, safety and responsible use data. In the store, information will be posted to warn parents and families about the dangers of marijuana. This data is also contained in our patient handbook that is provided to all patients on their first visit.

3. 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.

- a. All patients and customers are provided with our website and patient handbook that both have important information that informs customers about restrictions on public consumption and workplace use, the risks of second-hand smoke, the dangers of operating a motor vehicle while impaired and the risks to minors. Both the website and patient handbook detail the risks and warnings of cannabis consumption as well as updates on how the new laws affect cannabis consumers.
- b. We have invested in two billboards on route 93 in Somerville with the Public Service Announcement message, "Don't Drive High" as a way to get this important message out and to let our customers and the community know that we take the law and public safety seriously. Public Service Announcements via billboards and other means will be an ongoing priority.
- c. RC has created an ongoing employment position called *Wellness Consultant*, whose primary role is to educate patients and customers. During a customer's first visit they meet with the Wellness Consultant who will discuss the various products and ingestion

methods, responsible use, dosage information, safe storage strategies, and appropriate warnings. Patients are free to schedule a consult with a Wellness Consultant at any time with various methods including: in-person, via phone, text, email, etc.

- d. We provide customers with data on product package labels that contains the CCC-mandated warnings, disclaimer language and product safety information. Product labels have a CCC-mandated symbol that shows the product contains THC and language that states the product contains THC as a warning to keep away from minors and prohibited persons, and that products containing THC should not be consumed while pregnant.
- e. We educate all customers that they can call our store, email us, or come in to visit to have their questions answered. Rev Clinics consistently updates our standard operating procedures to incorporate best practices addressing the latest safety data.
- f. Third-party addiction and support resources are made available to all customers both online and in-store.
- g. Our website, www.RevClinics.com has detailed warnings, legal info, safety and responsible use data.
- h. Patients and customers are warned that if they are caught violating the law and/or consuming cannabis on our property or in the neighborhood they will be banned from entering our facilities and reported to authorities as appropriate. We regularly monitor our property and the immediate neighborhood to ensure that no one is consuming cannabis products illegally.

4. **Describe how the Applicant will market its products, including, but not limited to, broadcast, print, and online advertising, direct-response advertising, social media, and signage.**

- a. Revolutionary Clinics will be compliant with all advertising, marketing, and sponsorship regulations of 935 CMR 500.000.
- b. All marketing activities will be prohibited from;
 - i. Advertising, marketing and branding by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, or print publication, 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;
 - ii. Advertising, marketing, and branding that utilizes statements, designs, representations, pictures or illustrations that portray anyone younger than 21 years old;
 - iii. Advertising, marketing, and branding including, but not limited to, mascots, cartoons, brand sponsorships and celebrity endorsements, that is deemed to appeal to a person younger than 21 years old;
 - iv. The use of vehicles equipped with radio or loud speakers for the advertising of marijuana;
 - v. Advertising, marketing, and branding at, or in connection with, a charitable, sporting or similar event, unless at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data;

- vi. Operating a website that fails to verify that the entrant is 21 years of age or older;
 - vii. Any advertising, marketing, and branding materials for marijuana products that fails to contain the standard health warning developed by the DPH or CCC;
 - viii. Any advertising of an improper or objectionable nature including, but not limited to, the use of recipe books or pamphlets for marijuana products which contain obscene or suggestive statements;
 - ix. Advertising, marketing or branding of marijuana products on clothing, cups, drink holders, apparel accessories, electronic equipment or accessories, sporting equipment, novelty items and similar portable promotional items;
 - x. Signs or other printed matter advertising any brand or kind of marijuana product that are displayed on the exterior or interior of any licensed premises wherein marijuana products are not regularly and usually kept for sale.
- c. Most of Revolutionary Clinics marketing focuses on brand and mission and not necessarily on products. Our products are primarily marketed via:
- i. Our website: www.revolutionaryclinics.org, and third-party websites such as Leafly and Weedmaps.
 - ii. Educational videos that can be found on our website.
 - iii. A brochure that we use specifically as a showcase for wholesale opportunities and as a reference tool at tradeshows and conferences.
 - iv. A newsletter to customers that have opted-in to be contacted twice a week as well as occasional text messages.
 - v. Social media including Instagram, Facebook and Twitter
 - vi. Educational events staged at our dispensary
 - vii. In-store signage and display
 - viii. Ads in various magazines that have a readership that is at least 85% over age 21.
- d. We will market the Revolutionary Clinics brand and mission in all of the above mediums (i-vii) along with a limited amount of:
- i. Print advertising
 - ii. Outdoor advertising (currently a public service announcement about not driving under the influence)
 - iii. Digital advertising
 - iv. Sponsorships
 - v. Podcasts
 - vi. Potentially on radio and TV as it becomes available
- e. In all cases our advertising mediums and messaging will comply with the published CCC guidelines and restrictions.
- f. We will not market to children or in places where children regularly congregate
- g. We will place advertisements only in publications where at least 85% of readers are over age 21.

5. Describe the sources of the Applicant's inventory or manufacturing materials.

- a. RC was awarded an Adult-Use Cultivation and Manufacturing license by the CCC on January 25, 2019. The bulk of our products, estimated to be at least 90% of our goods

sold, will come from our Fitchburg facility. In the event we cannot meet demand, we will wholesale products only from CCC-licensed Massachusetts operators.

- b. All RC products are manufactured at our CCC-approved Cultivation and Manufacturing facility at 1 Oak Hill Road, Fitchburg, MA. Products are shipped from Fitchburg in their final container and no processing or packaging is done at the retail facility, preventing odors from becoming an issue. This also minimizes the risk of diversion.
- c. Types of Products to be Sold: Revolutionary Clinics' experienced cultivation, production and culinary staff will use the latest and safest methods to grow and infuse medicine into delicious, health-conscious products in compliance with applicable provisions of 935 CMR 500.150. These products will include:
 - i. Flower products: a full spectrum of varied potency flower will be offered in indica, sativa, hybrid, and CBD-dominant strains to meet patient and consumer demand.
 - ii. Marijuana-infused Products (MIPs) will be sold in many varieties. Please note that all products are not designed or shaped in ways that attract children:
 - 1. Edibles: Candy, mints, chocolates, fruit chews, lozenges, baked goods and snacks, honey, peanut butter, hazelnut spread, cooking oils, etc.
 - 2. Topical products: salves, lotions, lip balms, patches, etc.
 - 3. Sublingually administrable products: tinctures, dissolvable strips, etc.
 - 4. Concentrate products: rosin, oil, wax, shatter, distillate, live resin, etc.
 - 5. Accessories and Implements of Usage: pipes, vaporizers, papers, grinders, etc.

6. **Describe how the Applicant will package and label products at the point of sale.**

- a. All products arrive at the retail facilities from RC's Cultivation and Manufacturing facility in Fitchburg, MA. These products arrive sealed, labeled with testing results in their final package. No package or processing is done at the retail facility. At the point of sale, a final sticker is added to the package that includes: the patient or customer's name, the selling dispensary name, RMD #, RMD address, RMD contact info, and date of sale.
- b. All products are not designed or shaped in ways that attract children.
- c. We provide customers with data on product package labels that contains the CCC-mandated warnings, disclaimer language and product safety information. Product labels have a CCC-mandated symbol that shows the product contains THC and language that states the product contains THC as a warning to keep away from minors and prohibited persons, and that products containing THC should not be consumed while pregnant.

7. **Describe who the Applicant will employ, and the wages and benefits that will be provided**

- a. Revolutionary Clinics is an Equal Opportunity Employer and does not tolerate unlawful discrimination in its employment practices. No question on our application is used for the purpose of limiting or excluding an applicant from consideration for employment on the basis of his or her race, religion, color, sex (including pregnancy), age, ancestry, national origin, disability, sexual orientation, gender identity, military status, genetic information, or any other protected status under applicable federal, state, or local law.

- b. Revolutionary Clinics will make reasonable accommodations for qualified individuals with known disabilities, unless doing so would result in an undue hardship. This policy governs all aspects of employment, including, but not limited to, selection, job assignment, compensation, discipline, termination, and access to benefits and training.
- c. We are committed to equal employment opportunity in all aspects of employment, including, but not limited to, hiring, promotion, salary, benefits, and other terms and conditions of employment and discharge.
- d. We make every effort to hire from within by giving promotions to qualified individuals.
- e. RC will make efforts to advertise job openings in the areas of Somerville more economically disadvantaged as well as ensure that advertisements are published in Spanish, Portuguese, and Creole. RC will hire individuals formally incarcerated for marijuana offences as well as commit to using best efforts and all available resources to employ at least 30% of their staff that fall under any of the following categories:
 - i. Somerville residents of African American decent
 - ii. Somerville residents of Latino decent
 - iii. Somerville resident veterans
 - iv. State-approved Economic Empowerment Applicants
 - v. Individuals formally incarcerated for a marijuana offence
- f. The medical dispensary at 67 Broadway currently employs 17 full-time employees. Four employees, or 24% of the total, are Somerville residents. Due to our hiring preference for Somerville residents we anticipate the number of City residents will grow as we expand into adult-use sales. Under our proposed plan we will have 40 employees total for both medical and adult-use operations. We will continue our hiring preference for Somerville residents.
- g. Revolutionary Clinics' Employment Statistics:
 - i. Total Employees: 88 (Includes all personnel in Somerville, Cambridge and Fitchburg)
 - ii. Total employees working in our Somerville store: 17
 - iii. Total Somerville residents working in our Somerville store: 4 of 17 (24%)
 - 1. Our goal is to increase this percentage to at least 30% within 90 days.
 - iv. Minority employees: 30 of 88 (34%)
 - v. Female employees: 31 of 88 (35%)
 - vi. Veterans: 5 (6%)
 - vii. LGBTQ+ employees: Numbers are not available for the number of LGBTQ+ employees but they are well represented at RC as we ensure our staff reflects the communities in which we serve.
 - viii. Employees living in *Areas of Disproportionate Impact*: 26 (30%)
 - 1. Boston: 7; Fitchburg: 7; Lynn: 2; Worcester: 3; Brockton: 2; Revere: 1; Haverhill: 1.
- h. Wages:
 - i. Minimum wages for RC's retail employees is \$15.00/hour for reception and \$19.23/hour for patient advocates and reception. This is based on expected earnings of \$40,000/year. All employees are expected to work 40 hours per week. Overtime is available on a limited basis as needed.

- ii. Starting salaries for Managers is \$65,000 per year and senior managers can earn \$85,000.
- i. Benefits:
 - i. RC pays 65% of health insurance premiums for all employees.
 - ii. RC also provides optional dental insurance.
 - iii. We have at least two employee appreciation events per year.
 - iv. Employee discounts of 30% are offered to all employees.
 - v. We provide training for upward mobility and make every effort to hire from within.

8. Describe how the Applicant will use sustainable green practices and renewable energy sources.

- a. Revolutionary Clinics boasts one of the greenest and most environmentally responsible cultivation and manufacturing facilities in the world. The Fitchburg facility is the only one in Massachusetts that uses LED lights for 100% of cultivation which saves electricity and capital. The facility also has 19 geothermal wells that each go from 1,600' – 2,000' into the ground to pull out cold water which is used to liquid-cool the LED lights. Heat exchangers capture the heat at the other end to use the now heated water that cooled the lights to heat the building and for hot water. We were recently awarded a \$470,000 check from our utility provider for being so environmentally efficient.
- b. Whenever possible, we carefully select packaging products that are either recyclable, biodegradable, or compostable.
- c. RC created the *RevReCycle* program where patients and customers are rewarded with a credit on their purchase for recycling their clean, used packages at the retail stores.

9. Describe how the Applicant will further each of these Somerville values:

- a. Celebrating the diversity of our people, cultures, housing and economy.
 - i. RC employs qualified staff that reflects the communities we serve. We are proud to have employees from all walks of life, cultures, races and orientations.
 - ii. RC has joined East Somerville Main Streets (ESMS) as an annual sponsor. We regularly join ESMS in celebrating Somerville's people, cultures, housing and economy by sponsoring and participating in local events such as Carnavalé, A Taste of Somerville, Spring and Fall cleanups, murals, and other events.
 - iii. Where the number-one contributing factor to patients avoiding medical cannabis is the affiliated price, we created the most generous affinity programs and discounts in the Commonwealth for patients and customers to ease the financial burden of purchasing our products when insurance will not cover the cost. Discounts include:
 - 1. 10% off for economically disadvantaged persons and people on MassHealth;
 - 2. 20% off for veterans and 40% off for 100%-disabled veterans;
 - 3. Special discounts for seniors and those with terminal illnesses such as cancer;

4. A rewards programs where you get a 5% back as credit towards future purchases. Double-rewards points Wednesdays have become our busiest day of sales.
 5. And many other specials and promotions.
- b. Fostering the unique character of our residents, neighborhoods, hills and squares, and the strength of our community spirit as expressed in our history, our cultural and social life, and our deep sense of civic engagement.
- i. RC hires staff that reflects the community in which we serve. Customers appreciate coming into the store to be helped by someone they can relate to.
 - ii. RC is poised to launch our “Rev Access” card that promotes discounts to local businesses like Vinny’s and Redbones BBQ to our customers.
 - iii. We offer regular events for customers and neighbors where we provide catered food from local Somerville eateries.
 - iv. We partner with local groups such as ESMS and the Welcome Project for culturally-specific programming made possible by our donations.
 - v. RC has joined East Somerville Main Streets (ESMS) as an annual sponsor. We regularly join ESMS in celebrating Somerville’s people, cultures, housing and economy by sponsoring and participating in local events such as Carnavale, A Taste of Somerville, Spring and Fall cleanups, murals, and other events.
 - vi. In the spirit of Somerville, we regularly host charity funding drives for local organizations that support people with epilepsy, cancer, homelessness and hunger.
 - vii. We love the neighborhood, its character and our neighbors. We are here to help those in need in any way we can. When we are able to sell under the adult-use designation and we become profitable, you can be certain that we will spread more wealth within the community. We love it here!
- c. Investing in the growth of a resilient economic base that is centered around transit, generates a wide variety of job opportunities, creates an active daytime population, supports independent local businesses, and secures fiscal self-sufficiency.
- i. Given that RC is open during the day, seven days per week, we create foot traffic in East Somerville that is much needed for local businesses.
 - ii. RC has created a partnership program called *Rev Access* in which we team-up with local business to drive our customers to their stores with incentive programs. Patients and customers can bring their receipts from our store to local restaurants and merchants for discounts and special promotions. Partners include Vinny’s Restaurant, Ola Café, Redbones, Taco Loco and others. Pending partners include Rincon Mexicano, Mudflat Pottery and others. This initiative helps us drive customers to local establishments for lunch and dinner and helps combat stagnant mid-day traffic by supporting independent local businesses.
 - iii. We will also offer training programs and job fairs to help Somerville residents find careers in the industry to gain meaningful and lasting employment options.

- iv. We give hiring preference to Somerville residents and our jobs range from unskilled to highly skilled with above market and above industry pay scales.
- d. Promoting a dynamic urban streetscape that embraces public transportation, reduces dependence on the automobile, and is accessible, inviting and safe for all pedestrians, bicyclists and transit riders.
 - i. At great expense, we have renovated the property to maintain its original neighborhood, homey character and to improve the overall neighborhood appearance. The maintenance of our newly renovated facade improves the local image as we are one of the first properties people see as they enter Somerville via Broadway.
 - ii. We encourage the use of public transportation and notify customers of public transportation options in our store and on our website.
 - iii. RC has made the investment to provide a handicap-accessible ramp to allow wheelchairs easy access to the facility. Many of our customers will only come to our store due to our customer service and ease of accessibility.
 - iv. We made every effort to select this location that is easily accessible without taking an automobile. We are within a 5-minute walk from the Sullivan Square MBTA station, there is a bus stop outside the front door and there are MBTA bus lines that connect in Sullivan Square. There are also four Blue Bike Stations within a 2-minute walk. The building is serviced by fifteen on-site parking spaces, on-street metered parking as well as additional municipal parking lots within walking distance. We have City bike racks outside the front door and we are also installing additional bike racks on our property for customers.
 - v. This site is located within the Medical Marijuana Overlay District; and is located within the Business BB Zoning District. RC secured this site after investing significant effort and resources to comply with the provisions of the Somerville Zoning Ordinance and Map.
- e. Building a sustainable future through strong environmental leadership, balanced transportation modes, engaging recreational and community spaces, exceptional schools and educational opportunities, improved community health, varied and affordable housing options, and effective stewardship of our natural resources.
 - i. Rev Clinics has the most environmentally responsible cultivation and manufacturing facility in MA with all-LED grow lights, geothermal wells to liquid-cool the LED grow lights; heat exchangers use the hot water at the other end to heat the building and for hot water before water is returned to the ground in this closed-loop system; water is conserved via automated feeding and fertigation systems that save resources including energy, water, labor and capital.
 - ii. As mentioned above, whenever possible, we carefully select packaging products that are either recyclable, biodegradable, or compostable.

- iii. RC created the *RevReCycle* program where patients and customers are rewarded with a credit on their purchase for recycling their clean, used packages at the retail stores.
 - iv. We will support CAB member Groundwork Somerville to help improve the neighborhood environment via charitable giving and volunteering.
 - v. We have sponsored mural projects to improve the beauty of the communities in which we serve.
 - vi. To help beautify the area, we have installed gardens in front of our building and on the Pennsylvania Avenue side of the property. We also maintain the sidewalks in front of and on the side of our property.
 - vii. We promote the use of public transportation to our customers and incentivize our staff to use public transportation by subsidizing MBTA passes by 50% to all staff.
 - viii. We have and will continue to offer programs that give a discount for people that ride their bicycles to our Somerville location. We will also help them park their bikes in a safe location and our security will keep a watchful eye on them while they visit our store.
- f. Committing to continued innovation and affirmation of our responsibility to current and future generations in all of our endeavors: business, technology, education, arts and government, including your neighbors (within 300 feet), City youth, and the City as a whole.
- i. Business: We support local business via our partnership program to drive business to local merchants. After working closely with the Director of East Somerville Main Streets, we understand that lunch-time traffic in East Somerville is limited so we created a partnership program to drive our patients and customers to support our neighbors. We regularly create promotions which incentivize our customers to support neighborhood restaurants and stores through discounts and other incentives such as customer loyalty points and other means. A vibrant business community is important to us and Somerville and we do what we can to help without having to be asked as a proactive organization.
 - ii. Technology: RC is an innovative company and we use the latest technology to ensure we maximize efficiency, maintain compliance, and employ the most environmentally responsible practices. Our investments in technology has prevented reporting errors to the DPH and CCC and help us to be compliant.
 - iii. Education: RC is constantly employing initiatives to help educate our customers and the community as a whole. Every week RC offers classes on health-related topics to customers and the community. Classes are led by our team and also by unaffiliated groups and nonprofits to educate patients, customers and the general public on improving health and healthy lifestyles. We also support education through donations to our Community Advisory Board. We also

produce and air regular educational videos which all can be found on our website.

- iv. Arts: RC is passionate about supporting the Arts. Every month RC hosts a local artist's works in our facility for "Artist of the Month". This allows us to support a local artist to help them expose their works to a wider audience. We give 100% of any art proceeds directly to the artist. We have also sponsored mural projects to beautify the community. We will continue to support the Arts via donations to our Community Advisory Board.
- v. Government: Bert Vining, Vice President of External Affairs regularly communicates with Ward 1 Alderman, Matt McLaughlin. Alderman McLaughlin has been helpful in keeping us up-to-date on Somerville's priorities, finding members for RC's Community Advisory Board (CAB), sharing neighborhood concerns, recommending candidates for employment, and ensuring that we are great neighbors by working closely with the CAB and fulfilling our mission to be a great neighbor.
- vi. Neighbors: RC has made great efforts to fulfill our mission to be the best neighbor possible. We listen to neighbors' concerns and make every effort to be responsive. All summer long we host customer appreciation events every Friday where we have a BBQ and neighbors are invited to attend these free events which are held in our parking lot. This has been a great way to meet the neighbors, make friends, share stories and make ourselves available to hear any issues that neighbors may have. We've made many friends in the community and they have learned that we can be trusted to live up to our word because we have proven that we listen and react appropriately.
- vii. City youth: We have a responsibility to prevent diversion of our products into the hands of minors. We print warnings in our patient handbooks and on our labels that remind patients and customers to keep marijuana away from minors and that it is a crime to provide cannabis to minors. We have also teamed up with Teen Empowerment and Groundwork Somerville to learn more about the issues facing minors and how we can help. We also support City youth via anonymous donations to Teen Empowerment and other civic groups that support youth populations.
- viii. The City as a whole:
 - 1. Our mission and our commitments are to be the best possible neighbor in the communities in which we serve. RC is proud to make positive contributions to the City; not only through our host community agreement but also through volunteer efforts, charitable giving and community outreach.

2. RC is pleased to dedicate 3% of gross profits to the City's Health and Human Services Department for drug education and treatment programs in Somerville.
3. RC has made a significant investment in the property and our business and we will never do anything to jeopardize our standing.
4. RC's Plan for Positive Impact will support the City as a whole. See the Plan for Positive Impact in the Section 3: Operating Information Narrative/Business Plan that follows this response.