

Community Outreach Meeting
Eddie's Flowers, Inc.
23 Rindge State Rd. Ashburnham MA
January 25, 2022

Meeting Materials

- The type(s) of Adult-use Marijuana Establishment to be located at the proposed address;
- Information adequate to demonstrate that the Adult-use Marijuana Establishment location will be maintained securely;
- Steps to be taken by the Adult-use Marijuana Establishment to prevent diversion to minors;
- A plan by the Marijuana Establishment to positively impact the community; and
- Information adequate to demonstrate that the location will not constitute a nuisance to the community by noise, odor, dust, glare, fumes, vibration, heat, or other conditions likely to cause nuisance.

Marijuana Review Team Application Cannabis Cultivation Facility 23 Rindge State Road, Ashburnham, MA



Submitted by:
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Introduction

Eddie's Flowers, Inc. ("Eddie's Flowers, Inc.") is a Massachusetts corporation requesting consideration to enter into a Host Community Agreement with the Town of Ashburnham, MA. Eddie's Flowers, Inc. desires to execute a Host Community Agreement for the development, construction and operation of a Marijuana Establishment within the Town, in accordance with applicable laws and regulations (935 CMR 500.101). Eddie's Flowers, Inc. will operate an establishment at 23 Rindge St. Rd., in Ashburnham, Massachusetts in a professional, efficient, and conscientious manner consistent with the stated goals of the town, and in full compliance with the regulations as promulgated by the Commonwealth of Massachusetts.

Eddie's Flowers, Inc. is proposing to create 25 new jobs for qualified Ashburnham residents as a result of its anticipated operation. Eddie's Flowers, Inc. is committed that our staff will be as diverse as our city. It is in the best interest of the town and the surrounding neighborhood to grant this license to secure the tax revenue remains local.

Eddie's Flowers, Inc. is a Springfield Massachusetts based company. Its officers and directors include minorities, and residents of disproportionately impacted neighborhoods.

As a local business, its shareholders strive to become leaders within the community and creating a positive impact. All those affiliated with Eddie's Flowers, Inc. are dedicated to creating a revolutionary, state of the art cannabis facility while striving to create a positive change to the neighborhood and the citizens of Ashburnham.

Eddie's Flowers, Inc. is proposing a fully integrated retail, manufacturing, and cultivation operation at one location. The location of this operation is adequate to accommodate such a facility in that it contains sufficient space for all operations without creating a detrimental impact to the immediate community. This proposal is an innovative approach to mitigate the epidemic of vacant storefronts and distressed properties.

Thank you for the opportunity to present this proposal and for your consideration in advance. Eddie's Flowers, Inc. looks forward to working with the Town of Ashburnham and its residents.

Sincerely,

/David A. Mech/

David A Mech, Esq

Project Description

The Property

This beautiful Post and Beam commercial building located is on the corner of Route 119 and Route 101 in Ashburnham, MA. This young building offers an open concept first floor creating endless opportunities for a modern and effective Retail Marijuana Establishment. There are two handicap bathrooms and a kitchen area, which will be used in our Manufacturing of Cannabis products.. The second floor is an expansive finished office area with separate heat source, full bathroom and separate storage area. We intend to use a portion of the second floor for our manufacturing operation, a separate application for Manufacturing is to be submitted, along with one for Cultivation. The property is equipped with public water supply, and the septic system has been overbuilt, allowing for more than enough capacity for all operations. Commercial zoning allows for the Adult Use Retail business at this location, which is close to the NH line. We intend to Cultivate approximately 7,500 sq. ft. of Canopy, in a 10,000 sq. ft. Greenhouse in the rear of the property.

Operations Plan

People

Iyad Jamal, President
576 Main St.
Somers, CT 06071

Iyad, “Eddie” Jamal, at 34, is the American success story. Eddie began with one gas station in Somers CT, and, through hard work, and “long, long, hours”, Eddie Jamal currently owns and operates 7 establishments in both Massachusetts (Holyoke), and Connecticut (Somers), (Plainville), (Manchester). In 2013, Jamal also started a successful Smoke Shop, in Somers, CT, “Bogeys” which also includes the sale of CBD products. The CBD industry is no different than the “Adult Use” Marijuana industry, in that, both are licensed through the Commonwealth of

Massachusetts through the Cannabis Control Commission, (Marijuana), and the Department of Agriculture (CBD). The main difference is the THC content in the “flower”. CBD contains less than .03 percent THC, and therefore is not **FEDERALLY** prohibited.

In Sum, under the direction of Eddie Jamal, Eddie’s Flowers will help make Ashburnham, MA, the Massachusetts “Success Story”.

David A. Mech, Esq., Secretary and General Counsel
1 Crescent Hill
Springfield, MA 01105

David Mech is a Massachusetts native, Springfield resident and Eddie’s Flowers, Inc. Secretary. He has been involved all aspects of the medical cannabis industry. In 2010-2011 Mech consulted with medical cannabis patients and assisted them in forming patient cooperatives in Lake County, California, while also gaining hands-on cultivation experience in “The Emerald Triangle”.

Mech was also involved in Arizona’s medical cannabis industry from its inception, co-founding and providing legal representation for various cannabis establishments, including Arizona’s Award winning “Level Up” Dispensary.

In 2012 David Mech founded one of the original medical cannabis certification facilities in Massachusetts’ Pioneer Valley, Community Health Clinics, PLLC, along with Dr. William Cristo, Jr., introducing the concept “Coordinated Care” to physicians and encouraging them to work in unison when addressing the needs of “ complex care” patients for whom medical cannabis is prescribed.

Mech and Cristo also developed Cannascan, a software application that included an online patient verification system linked with medical providers, which allowed law enforcement to verify a patient’s status, before the Department of Public Health issued actual Patient ID Cards.

David is the president and founder of First Aid for our Troops, which since 2005 has helped soldiers and their families upon returning from the Middle East at Walter Reed Medical Center. Mech will also direct Security, hiring professionally trained personnel to ensure the safety of the public.

In earlier years, Mech worked for Burns Security for over ten years as a “special operator”, working in whatever facility he was needed, including large corporations such as Connecticut Natural Gas, in Hartford. Mech has also litigated many establishment negligence cases, including liquor and other major safety violations, and is familiar with current premises security procedures.

Ruben Marques: Director of Manufacturing.

Ruben and his growing CBD company, Erva, is located in Boston's Jamaica Plain section. Jamaica Plain is a "disproportionately impacted" community, where, Marques and Erva have thrived, despite the many challenges faced. Erva's Mission Statement is as Follows:

Erva creates top-of-the-line wellness products from hemp, grown completely naturally and organically, utilizing the various cannabinoids available in the herb to address a wide variety of ailments that affect our society today. Erva stands for whole-plant, solvent free infusions, rather than extractions that utilize solvents. This is a unique approach to processing which aligns with Erva's philosophy of providing community access to the cleanest and purest possible healing hemp products, while keeping our body, soul and environment's health in mind.

Erva, which started its practice in early 2018, has from the beginning participated in community outreach and has helped organize and curate hundreds of small educational gatherings and events bringing like minded people together by providing a safe space for discourse and the sharing of holistic ideas.

Currently, during the Covid-19 pandemic, Erva has shifted its focus to helping the public and especially front-line workers at hospitals to fight the spread of the virus by providing CBD infused hand sanitizers to those who need it. To date Erva has donated over a thousand hand sanitizers. Erva believes in placing 'patients over profits' and is dedicated to continue to do the most important work for the betterment of society and to be the voice for those who are most vulnerable.

John Weiman, Director of Cultivation Operations

58 Primrose Street

Indian Orchard, MA 1161

John Weiman is a resident of Springfield with an extensive background in the legal cultivation of recreational and medical cannabis. John's experience dates back to the infancy stage of the cannabis industry. John's experience is practical in that he was involved with indoor and outdoor cultivation. John was a registered grower and license holder from the Oregon Health Authority. Within the industry John is considered an expert and recognized as a Master Gardener/Grower. John's experience from Oregon expanded to include management, identification and treatment for pest and disease. John's experience also includes industrial grow facility design and consultation to Retail Marijuana Establishments.

Operating Experience

Eddie's Flowers, Inc.'s Board of Directors and Officers are highly experienced non-profit, healthcare, marijuana, and business professionals. Most have developed and operate other cannabis projects within and outside of Massachusetts. The Directors and Officers are committed to operating a within the regulatory standards and to develop as a model within the community.

Location

23 Rindge State Road in Ashburnham, Massachusetts is an ideal location for a retail marijuana establishment. Located at the intersection of Mass. Rtes. 101 and 119, this high traffic location will service local residents along with travelers from all areas in Mass. Nearby Mt. Watatic State Reservation attracts tens of thousands of visitors per year as well.

Traffic

Routes 101 and 119 are designed to accommodate the increase in vehicle traffic that a retail establishment will bring.

Zoning

The site is zoned Commercial, and is in compliance with the zoning regulations for retail sale of cannabis set forth in Article 17, Sec. 5.20. It also complies with all buffer zone requirements as demonstrated below; there are no schools, or residences within 500 feet of the site, and Section 5.10 of the Ashburnham Zoning Bylaws.

Design & Construction

Eddie's Flowers, Inc. will be undertaking to remodel 5,000 square feet of the building interior, which is anticipated to cost \$300,000.00. The intent is to construct a retail space contain display counter where each bud-tender will have all of the facilities products available. The anticipated construction will be folded into Eddie's Flowers, Inc.'s development of the entire space, which includes its retail space, and a separate Manufacturing facility on the second level.

Fiscal Impact

The proposed use of the building will not create an increase to the fiscal impact upon town of Ashburnham. Eddie's Flowers, Inc. does not anticipate any disruption during construction phase or ultimate operation.

This proposed use is substantially equal to the demand on municipal services required by the former, Country Store's use of the property. While the operation may cause a mild increase in traffic to the facility, the location and infrastructure are more than adequate to accommodate what is anticipated. There are adequate water and sewer services at the location. (see letter/report from Northeast Engineering attached hereto as Exhibit "E".)

Rather than viewing this as a potential negative impact, there would seem to be a significant fiscal advantage in that this would help preserve the real property tax base by having Eddie's Flowers, Inc. as a long-term presence at the property. This facility is completely self-contained (water and septic), thus will not have any impact environmentally.

Eddie's Flowers, Inc. intends on hiring an independent contractor to evaluate and recommend improvements to the safe and sanitary condition of its facility. Eddie's Flowers, Inc. will comply with all permitting and sanitary requirements pursuant to 105 CMR 590.

Public Health and Safety

Eddie's Flowers, Inc. will utilize state of the art security measures inside and outside of the establishment including proper lighting inside and outside of the establishment, as well as proper alarms and video surveillance. The security team will physically monitor the premises 24/7 as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Lighting

Eddie's Flowers, Inc. will install photo cell controlled, directed diode LED pole lamp heads outside of the registered premises that adequately illuminate the facility and its immediate surrounding areas, including the parking and entry areas. In addition to the pole lamps, LED wall pack lighting will be installed on the exterior where needed. All lighting will meet the lighting requirement of the video surveillance devices, allowing for the identification of people, vehicles and license plates. The directed diodes are designed to deflect away from adjacent residential properties.

Exterior wall packs and interior lighting (including exit and emergency lighting) will be served by a backup generator in the event of a power outage.

Cameras

Eddie's Flowers, Inc. will employ a video surveillance system, combining high resolution megapixel Pan, Tilt and Zoom (PTZ) and still cameras, covering all points of entry, as well as the retail, storage, manufacturing and cultivation areas of the facility. This system will have the capability to record, archive and playback video feed for a minimum of ninety (90) days. The system will provide flexibility and multiple streams for efficient operations and prompt investigations. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area

with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities. Electronic locks, requiring keypad access codes, will be used to secure the security viewing area. A current list of authorized employees and service personnel that have access to the surveillance room will be available to law enforcement upon request.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Security Staff

Eddie's Flowers, Inc. will employ adequate security personnel with a focus on hiring officers with a history of military and law enforcement service. They will be equipped with the latest in communication devices and equipment. Eddie's Flowers, Inc. will provide training that also focuses on compassionate de-escalation techniques.

Security Plan

500.110: Security Requirements for Marijuana Establishments

Premises Security

Security measures in compliance with 935 CMR 500.110:

Eddie's Flowers, Inc. utilizes state of the art security measures inside and outside of the establishment. As demonstrated in the written plans for security at Eddie's Flowers, Inc., proper lighting will be installed outside of the establishment, as well as proper alarms and video surveillance. Eddie's Flowers, Inc. Security Team will physically monitor the premises as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Eddie's Flowers, Inc. will limit access to all areas of the establishment where marijuana will be cultivated, processed and stored to authorized agents. Eddie's Flowers, Inc. will control access to secure areas through the use of access control devices, including biometric locks (thumbprint access), which will ensure that access is limited to only authorized personnel.

In addition, all staff will be required to visibly wear their provided establishment agent registration card at all times while on-site and when making deliveries.

For added security, visitor access will be strictly controlled. All outside vendors, contractors, and visitors must obtain and wear a visitor identification badge prior to entering any limited access area. All visitors will be escorted by a security associate escort at all times inside the enclosed, locked facility where marijuana is stored and/or cultivated. All visitors must be logged in and out, and that log will be available for inspection by the Commission at all times. All visitor identification badges must be returned to the escort upon exit.

The outside of the premises will be well lit, and will have video (as described below in “Security Procedures”) and patrolling security personnel, outside the premises 24 hours per day.

Diversion Protection/Employee Theft

There shall be access areas accessible only to specifically authorized personnel. Access to secure areas will be controlled through the use of access control devices, including biometrics or access card locks, which will effectively limit access to only authorized personnel. MAC will post the following statement (at a minimum size of 12” x 12” with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify.

Limited-access areas: “Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only.”

Eddie’s Flowers, Inc. shall provide all establishment agents with varying levels of access to limited access areas depending on their position. For example, the officers will have access to all areas of the establishment facility, including all limited access areas. Associate level positions, on the other hand, will be limited to only those areas directly related to their department and position within their department.

All finished marijuana product shall be stored in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie’s Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will convert the storage space into a walk-in safe (“vault”). We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. Eddie’s Flowers, Inc. employees and

management shall keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. All equipment shall be kept in good working order.

The company shall use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel. All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

CMR 500.110

- Positively identifying individuals seeking access to the premises of the Marijuana Establishment or to whom or marijuana products are being transported pursuant to 935 CMR 500.105(14) to limit access solely to individuals 21 years of age or older;

- As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises.

- Adopting procedures to prevent loitering and ensure that only individuals engaging in activity expressly or by necessary implication permitted by these regulations and its enabling statute are allowed to remain on the premises;

- Prior to entering the establishment, all customers must present valid government identification for visual inspection by a member of our Security team, ensuring the customer is 21 or over. These forms of identification include:

- A valid, unexpired government-issued photo ID card with name, photograph, and date of birth, which matches the information on the Registration Card. This will be limited to one Passport

Once identification has been verified, by a member of our Security team, customers will enter the building through a secure vestibule area; this double-door system will serve as an additional measure to control access to the building. Once a customer's identity has

been verified, only then will they have been granted access to the building.
of the following:

- Driver's License
- Government-issued ID card
- Military ID card

Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc.'s agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain operational during a power outage.

Our comprehensive security plan has been designed to monitor and protect all areas where a compromise to the safety and All medicinal marijuana and Marijuana Infused Products (MIPS) will be stored in Limited Access Areas (LAA) in a secure, locked safe or vault to prevent diversion, theft, and loss. Any marijuana waste generated at the clinic will be stored in a dedicated, secure compartment within the facility, and will be transported back to MAC's cultivation facility for proper, secure disposal in accordance with CCC regulations.

The outside perimeter of the premises will be sufficiently lit to allow for surveillance, and foliage will be removed so as not to allow persons to conceal themselves from sight. Perimeter alarms will be placed on all entry points, and perimeter windows will have duress, panic, and holdup alarms that are connected to local law enforcement systems. The Establishment will have a redundancy alarm system that will ensure an active alarm in the event the primary alarm is compromised and a failure notification system will notify management and local law enforcement in the event of a surveillance system failure within five minutes.

Video cameras will be used in all areas that contain marijuana, all entrances and exits, and in the parking lot. Our surveillance security of the building might occur.

Particular emphasis has been placed on customer and staff safety, safeguarding storage, handling and distribution of marijuana. In addition, comprehensive operational policies and procedures have been detailed in the Security Department's Operations Manual.

Eddie's Flowers, Inc. has contracted with a qualified Massachusetts security contractor, Beacon Protection, which specializes in developing thorough security systems to develop and install a superior security system. Eddie's Flowers, Inc. will also use internal loss prevention methods, standard retail cash handling procedures, and track daily reimbursements and expenses. The security policies and procedures implemented

at Eddie's Flowers, Inc. have been proven successful in safeguarding marijuana establishments.

Exceeding the security requirements of Massachusetts law, Eddie's Flowers, Inc. will utilize a comprehensive security system designed to monitor and protect all potential areas of Eddie's Flowers, Inc.. The principal concept of securing the facility focuses on the following three areas:

- Safeguarding the storage of marijuana.
- Providing a safe and secure environment for Eddie's Flowers, Inc. staff, patients and visitors.
- Developing comprehensive audit procedures for the entire operation as related to the handling and distribution of the product.

The security system at Eddie's Flowers, Inc. features four (4) elements that will work together to ensure maximum protection of the facility. These features are described below and include:

- Access Control System
- Intrusion Detection
- Lighting
- Video Surveillance System

Access Control

As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises. Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc. agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain operational during a power outage.

Eddie's Flowers, Inc. will feature an alarm system on all entry points and windows. Motion detectors shall also be placed in all interior portions of the establishment.

Eddie's Flowers, Inc. will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

The establishment shall keep all safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel.

We will install a 'duress alarm' (silent alarm to signal alarm user being forced to turn off system), a 'holdup alarm' (robbery in progress), and a 'panic alarm' (life threatening or emergency situation). Alarms will be placed throughout the establishment at strategic locations coordinated with local public officials.

We will post the following statement (at a minimum size of 12" x 12" with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify limited-access areas: "Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only."

Eddie's Flowers, Inc. has included a floor plan of our facility with this application, to demonstrate the design scheme and security features to be used at Eddie's Flowers, Inc..

We will limit access to all areas of the establishment facility where marijuana will be processed and stored to authorized establishment agents. All outside vendors, contractors, and visitors must obtain a visitor identification badge prior to entering a limited access area; the visitor identification badge must be visibly displayed at all times while the visitor is in any limited access area. All visitors must be logged in and out, and that log shall be available for inspection by the Department at all times. All visitor identification badges shall be returned upon exit. For added security, we will require that Security accompany any non- establishment agent if a non-establishment agent needs to enter the enclosed, locked facility where marijuana is stored and/or cultivated.

Eddie's Flowers, Inc. will use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel. All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Trees, bushes and other foliage outside of the Marijuana Establishment shall be maintained so as to prevent a person or persons from concealing themselves from sight.

Intrusion Detection

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana, including the storage safe.

Lighting

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana including the storage safe

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

Electronic Surveillance System

The security system must thwart threats at all times, especially outside of store hours where no one will be present. The intrusion detection system must include an alarm system that detects unauthorized access or attempts (including tampering) of all secured entry points, our customer door and cannabis storage room. In case of a break-in or attempted break-in, we will have our intrusion detection system immediately repaired.

We will also install intrusion detection system with a law-enforcement response system. This includes a panic/help-button at the point-of-sale area for employees in case of a robbery or another threat. However, its best practice to ensure our alarm also triggers a response from the police, which will be our first-respondents during nighttime break-ins.

Eddie's Flowers, Inc. will maintain all security system equipment and recordings in a secure location so as to prevent theft, loss, destruction, and alterations. This will be a limited access area featuring electronic locks that allow restricted access to select authorized establishment agents, such as the Security Manager and CEO, as well as law enforcement authorities and the Department.

Eddie's Flowers, Inc. will have a back-up alarm system, with all capabilities of the primary system (this shall not be the same company as the primary security system).

The electronic monitoring system for Eddie's Flowers, Inc. includes a failure notification system that provides both an audio and visual notification should a

failure in the electronic monitoring system occur. Additionally, senior management will receive email/text notification of the system failure within five minutes after the failure.

Eddie's Flowers, Inc.'s video surveillance system will have the capability to record, archive and playback video feed for a minimum of 30 days. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities and the Department. A current list of authorized employees and service personnel that have access to the surveillance room will be available to the Department upon request. Electronic locks will be used to secure the security viewing area, access will only be granted to authorized establishment agents.

Our video recording will be operational 24 hours a day/7 days a week. Videos will be retained for a minimum of 90 days or unless requested longer by appropriate authority.

Eddie's Flowers, Inc. will embed a date and time stamp on all recordings. The date and time will be synchronized and set correctly and will not significantly obscure the picture.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Eddie's Flowers, Inc.'s surveillance system will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. All recordings will be erased or destroyed prior to disposal.

We will maintain a high-quality printer in the security viewing area that is capable of immediately producing a clear still photo from any video camera image.

Eddie's Flowers, Inc. will go to great lengths to protect the confidentiality of our security measures, such as combination numbers, passwords, and electronic lock activators, against threats from unauthorized personnel.

Public Safety Concerns

Contrary to initial concerns, the establishment of a marijuana facility has been shown to actually deter crime in the surrounding community due to the significant

investment in security personnel and infrastructure. Several studies have concluded that marijuana facilities do not lead to increased crime in their communities:

- In late 2010, the Denver Police Department analyzed crime rates in areas in and around dispensaries. The Department found that crime was down 8.2% in 2010 when compared with the same period in 2009, and as compared to an 8.8% drop in crime for the city overall.
- In a June 2011 Regent University study, researcher Maura Scherrer found that most crimes, including robbery, vandalism, and disorderly conduct increased in Denver from 2008 to 2009. However, in areas within 1,000 feet of a establishment, rates were down for most types of crime (including a 27.5% reduction in disorderly conduct citations). She concluded, “it appears that crime around the marijuana centers is considerably lower than citywide crime rates; a much different depiction than originally perceived.”
- A March 2014 study by researchers at the Program in Criminology at the University of Texas at Dallas analyzed the FBI’s Uniform Crime Report Data for states across the country between 1990 and 2006 and found that marijuana laws were not proven to have a crime exacerbating effect on any of the seven crime types they analyzed (homicide, forcible rape, robbery, aggravated assault, burglary, larceny, and auto theft). Additionally, they found that marijuana laws preceded reductions in homicide and assault.

The establishment of Eddie’s Flowers, Inc.’s Adult Use Marijuana Establishment will encourage visitors to the neighborhood, while the benefits of an increased security presence around the facility will have a significant positive impact on the entire neighborhood. Eddie’s Flowers, Inc. has a multi-tiered and sophisticated security system, with layers of surveillance cameras used both inside and outside the premises, and security guards employed to ensure safety. Eddie’s Flowers, Inc. presence will serve as a general deterrent to criminal activity and other problems on the street, thereby ensuring a safe environment not only for establishment members and staff but also for neighbors and businesses in the surrounding areas.

Abuse/Diversion Prevention Plan

Marijuana Possession and/or Use on Town Property

Eddie’s Flowers, Inc. will not allow any burning or consumption of any product containing marijuana or marijuana related products on the premises.

Eddie’s Flowers, Inc. will ensure that our customers and employees are educated on the prohibitions surrounding marijuana possession and/or use on city property. All

marijuana dispensing operations at Eddie’s Flowers, Inc. will take place on private property located within the required zoning district.

Eddie’s Flowers, Inc. will display signage, including the following language for restricted access areas.

“Do Not Enter—Limited Access Area—Access Limited to Authorized Personnel Only” in lettering no smaller than one inch in height.

Good Neighbor Policy

“As a member of this community, we ask that you be especially mindful of our neighbors. We have worked hard to establish a positive relationship with our neighbors, the town, and the police department. Please be respectful of our neighbors’ rights, privacy and property.

“We encourage you to help us keep our commitments to our neighbors by not creating a nuisance or lingering in the parking lot or sidewalk areas. Always be careful and courteous when entering or exiting the parking lot. These simple precautions will keep neighbor relationships in good standing and help prevent any legal interference with our operations. With your support, we plan to be here to serve you for years to come.”

Public Health Consequences

Eddie’s Flowers, Inc. is committed to instituting measures in an effort to prevent drugged driving and other adverse public health consequences associated with marijuana use. Eddie’s Flowers, Inc. will educate all customers on the use of marijuana. This is especially important if it is the first time the customer is using marijuana, or if the patient is using a different format for ingesting the medicine. Eddie’s Flowers, Inc. consultants will provide customers with a comprehensive understanding of our rules, special discount programs and library resources; various methods of cannabis administration and/or ingestion options, and related side effects; safety, effectiveness and techniques relating to edibles and drinks, and the safe consumption of cannabis; information comparing and contrasting Indica vis-à-vis Sativa; and recent scientific literature on clinical applications and health effects of marijuana.

While not every customer will want to ask questions, or discuss his or her medical condition, every customer will be encouraged to ask any questions of Eddie’s Flowers, Inc. consultants.

Eddie’s Flowers, Inc. believes that our best marketing efforts, and our best product, is the expertise and knowledge of our dispensing staff who can pass along to our patients their knowledge of the effects of different strains, various forms of ingestion, and the use of topical products. This one-on-one personalized service will enable our customers to choose the best and most effective cannabis for their individual needs.

All of the alternative dosage forms are laboratory tested for cannabinoid content, strength and consistency. They are provided to patients in sealed, tamper-proof packaging, and labeled with the name of product, nutritional information, cannabinoid content and other applicable information (i.e. strain, batch, quantity, etc., as appropriate), to be in compliance with the laws, rules and regulations of the Commonwealth of Massachusetts.

While always exceeding the state's specific standards for product labeling, additional labeling on all medical-cannabis products will include:

- "For Medicinal Use Only, Not For Resale;"
- "Keep Away From Children;"
- "WARNING: Marijuana use can impair an individual's ability to drive a motor vehicle or operate heavy machinery. Marijuana smoke contains carcinogens and can lead to an increased risk for cancer, tachycardia, hypertension, heart attack, and lung infection."

In terms of the public health impact of marijuana, various studies have indicated that the use of marijuana for medical purposes does not pose an immediate threat to public health. In addition, marijuana has been reported as an effective tool in treating opiate addiction. A 2013 study out of Wayne State University Medical School found that marijuana patients consistently reported using marijuana to substitute or wean off prescription narcotic drugs. All interviewed patients and producers reported having reduced their overall drug use, especially the use of opiates, by using marijuana. A 2012 Canadian study found that among marijuana patients from four dispensaries in British Columbia, 75.5% of respondents cited using cannabis as a substitute for another substance (41% reported using cannabis as a substitute for alcohol, 36.1% use cannabis as a substitute for illicit substances, and 67.8% use cannabis as a substitute for prescription drugs).

Preventing Violence, Diversion, and Illegal Activity (Including Trafficking)

In order to ensure our facility has adequate security coverage, we will employ onsite security guards 24 Hours per day, and employ routine patrols outside the Mall in the parking areas.

All security personnel will be required to complete an intensive department training and formal skills evaluation as a condition of employment. Training will include the proper use of security measures and controls that have been adopted by the establishment for the prevention of diversion, theft, or loss of marijuana; procedures and instructions for responding to an emergency; state and federal statutes and regulations regarding confidentiality of information related to medical use of

marijuana. All security personnel will also be required to complete an annual orientation and training seminar.

In addition, we have developed comprehensive security policies and procedures for employees regarding threats and acts of violence, and reporting security-related incidents such as theft, loss, vandalism, malicious or unauthorized use of company equipment or facilities, and allegations of employee misconduct. The Security Manager is responsible for ensuring this training occurs and for periodically quizzing establishment agents to ensure the knowledge is retained.

We have gone to great lengths to ensure our written policies are comprehensive, practical and suited for the industry. To achieve this, we've worked with leading experts to develop the comprehensive operational guides. All employees, including security personnel, will receive a copy of our Safety Handbook during Orientation Training. The Safety Handbook includes procedures for natural disasters (fire, earthquake, etc.), robbery, biological threats, evacuation plans, as well as safety and security prevention measures to ensure the safest environment possible and the ongoing well-being of members, staff, and the surrounding area.

We will also employ security guards during non-business hours along with our advanced security surveillance and alarm system, which will provide more than sufficient protection of our Establishment and the critical assets stored inside.

We will provide the Police Department, Fire Department, Building Commissioner, Board of Health, and Special Permit Granting Authority with the names, phone numbers and email addresses of all management staff and key holders whom one can provide notice if there are operating problems associated with the facility.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems. At least one security guard will be on duty anytime facility staff are in the facility.

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility. During the day-to-day operations and security manager supervisor will oversee these functions. In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security staff and performing the duties
- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design
- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and
- Using recognized best security practices, adhere all security related rules as described in the regulations.

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry (Not armed during duty at this time unless determined necessary due to threat)

-

Staffing

The Retail, Cultivation, and Manufacturing facilities will be staffed by security officers 24/7. This includes weekends holidays and evenings.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors
- Maintain the Security of the various interior sections of each facility, and ensure the security of the exterior areas through video surveillance and personal patrols.

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related

records are retained for a minimum of 10 years preference will be made for retired local police officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities
- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individuals shift and completed with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a

primary and secondary classification are established for incidents involving multiple issues.

- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Firearms and Weapons

Eddie's Flowers, Inc. will prohibit the presence of firearms and weaponry on all properties. This will be reiterated to our employees and patients during orientation as well as through our handbooks and Code of Conduct. Violations of this policy will result in immediate dismissal of the patient and/or employee.

Eddie's Flowers, Inc. does not intend to utilize armed guards for securing our RMD. Based on industry best practices and the professional experience of our industry advisors, we feel that the use of armed guards in our operations present several significant issues:

- The presence of an armed guard hasn't actually been shown to increase security;
- The range of security measures in our plan (including comprehensive intrusion detection, camera coverage, and limited access areas) work together to go above and beyond in terms of providing a very secure facility;
- The presence of armed guards disturbs the aesthetic of facilities designed to ensure a welcoming and inviting environment for patients; and
- The use of firearms causes tremendous legal issues at the State and Federal level, if a guard were to have to use force within the facility. Protections for the guard's behavior on-site do not exist, and the legal consequences for the use of a firearm in the presence of a controlled substance are unclear.

For these reasons, we will be firearm and weapon free.

Diversion

Eddie's Flowers, Inc.'s POS System, METRC, will be able to monitor inventory at all times. In addition proper training and constant video surveillance will prevent diversion.

Incident Reporting

We will utilize incident logs (referred to as Incident Reports) to document the occurrence of specific events. Security incidents should be reported in order to provide information to Management for decision-making, recovering lost or stolen property, obtaining restitution for losses, and aiding in the formulation of risk-reduction practices, policies and procedures. Each security Incident Report must be classified using one of the following:

- Any Security incident/law violation which may result in the dismissal or prosecution of employee(s)
- Alarm/False - Fire
- Alarm/False - Security
- Arrests by law enforcement
- Assault, attack, molestation or threats of/to employees while on company property or in the performance of their work
- Break & Enter - Building
- Burglary or attempted burglary of the building(s)
- Confrontations between staff and others
- Damaged Property - malicious or extensive
- Disturbance - Employee/Visitor/Contractor/Visitors
- Drug Abuse
- Fire
- Found Property
- Incidents which have a potential for receiving media coverage
- Injuries to staff, contractors, visitors, clients
- Incidents involving homicide, weapons, hostages, sabotage, explosions or hazardous chemicals

- Lost or stolen product [MUST BE REPORTED TO LOCAL LAW ENFORCEMENT. SEE SECTION BELOW ON REPORTING TO LAW ENFORCEMENT OFFICIALS.]
- Missing Property - Facility/Personal
- Misuse of company information and data processing where financial gain or damage to Eddie's Flowers, Inc. is involved
- Reports of substance abuse or sale of narcotics on property
- Robbery - Armed/Unarmed, or attempted robbery committed on Eddie's Flowers, Inc. property, or of a Eddie's Flowers, Inc. employee in the course of company business, regardless of whether anything was taken
- Sexual Incident - Harassment/Assault/Obscene Call/Other
- Suspicious Person - Contacted
- Suspicious Person - No Contact
- Suspicious Circumstances - General
- Theft or vandalism of property by an employee
- Theft or loss of credit cards
- Theft, forgery or alteration of checks
- Theft, unauthorized disclosure, loss, malicious destruction of proprietary information, or physical assets classified as sensitive, high-risk or confidential to include espionage, eavesdropping or other improper means of obtaining same
- Threat - Bomb
- Threat - Other, received by staff, visitors or contractors
- Trespass
- Vandalism - Facility/Personal/Vehicle
- Violation of any other law on company premises

In general, all thefts, damage, or loss over \$500 should be reported immediately. All security incidents listed above should be reported to the General Manager. Follow-up reports should be submitted concerning any significant developments relating to the incident. All incidents must be formally closed.

Reporting to Local Law Enforcement

In a non-emergency incident or when life/safety is not a concern, security personnel

are required to work with the General Manager prior to reporting a relevant security incident to the police.

Any incident involving lost or stolen product must be reported to the Department and to local law enforcement via a police report. All reports must be made within 12 hours of becoming aware of the theft or loss.

To notify authorities, staff will do one of the following:

- Call 911.
- File in-person with the Police Department.
- Submit a written report to the Police Department.

We will investigate all work-related accidents in a timely manner. The Security Manager is responsible for accident investigation, and other management personnel will be involved as needed.

All incidents are documented on individual Incident Reports, but they are also tracked by type, location, and number of incidents on a monthly Incident Summary.

There is one Incident Summary “By Type,” and one “By Location.” Incident Summaries are completed at each month’s end and submitted to the General Manager, along with a copy of all Incident Reports for that month. All Incident Reports shall be maintained indefinitely by the Security Department.

We will notify appropriate law enforcement authorities and the Commission of any breach of security immediately and, in no instance, more than 24 hours following discovery of the breach. Notification shall occur, but not be limited to, during the following occasions:

1. discovery of discrepancies identified during inventory;
2. diversion, theft or loss of any marijuana product;
3. any criminal action involving or occurring on or in the Marijuana Establishment premises;
4. any suspicious act involving the sale, cultivation, distribution, processing or production of marijuana by any person;
5. unauthorized destruction of marijuana;
6. any loss or unauthorized alteration of records related to marijuana;
7. an alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the Marijuana Establishment;
8. the failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours; or
9. any other breach of security.

Eddie’s Flowers, Inc. shall, within ten calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110(7)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any

corrective action taken, and confirmation that the appropriate law enforcement authorities were notified.

All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(7)(a) shall be maintained by a Marijuana Establishment for not less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities upon request.

Security Audits

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

Revenue

Eddie's Flowers, Inc. will implement policies and procedures to effectively prevent revenue from the sale of marijuana from supporting criminal enterprises, gangs, and cartels. Our chief financial officer will be responsible for managing all financial tasks for our organization including financial accounting and reporting, payroll preparation and administration, budget preparation, project management accounting, and risk management.

The METRC system is designed to collect data associated with business management including assets, liabilities, monetary transactions, and the like. METRC keeps a real-time record of all processes within the Establishment. Detailed, refined reports may easily be configured to produce the information required by management or upon inspection by state and local regulators. METRC features password protection and unique codes that will be used as electronic signatures. Records will be kept of all logins and records created or edited during that login time.

Our Operations and Management Practices Plan calls for the organized and secure retention of all business records including: assets and liabilities; monetary transactions; written or electronic accounts that include bank statements, journals, ledgers and supporting documents, agreements, checks, invoices and vouchers; and any other financial accounts reasonably related to the Establishment operations. Management will make frequent sweeps of cash drawers and place cash in the vault along with randomly scheduled cash pickups to deliver cash from the facility to our bank via armored car service.

Emergency Procedures

The establishment shall keep a First Aid kit on the premises at all times

All Agents shall be trained in basic First Aid, including CPR.

In the event of fire, the Vault and other areas shall be cleared, and staff shall escort customers out of the nearest exit, with each employee having specific duties to ensure the orderly evacuation of customers and staff.

A detailed evacuation route shall be posted, and included in the establishment's training manuals. One employee/agent shall be assigned the duty of conducting a head count upon evacuation of the premises.

In addition to any automatic alarms, the appropriate authorities shall be notified of the event, only after the premises are safely evacuated.

Management and Business Operations

Management Plan

Eddie's Flowers, Inc. is a corporation organized under the laws of the Commonwealth of Massachusetts. Eddie's Flowers, Inc. is submitting the following as (Exhibit "A")

1. Articles of Organization (Enclosed) Newly formed Corp.
2. Bylaws

Eddie's Flowers, Inc. anticipates receiving a timely and favorable response from the Town of Ashburnham. Eddie's Flowers, Inc. is prepared to submit its application for a Community Host Agreement/Special Permit. Upon approval from the Cannabis Control Commission it is anticipated that the initial build out will completed within four (4) months.

Eddie's Flowers, Inc. is obtaining a quote to satisfy its insurance requirements outlined within 935 CMR 500.105(10).

Eddie's Flowers, Inc.'s state of the art 10,000.00 square foot facility located at 23 Rindge State Road, will provide expert consultation, providing various forms of high quality cannabis in a safe, secure, welcoming environment. The project, if approved, would initially create at least 22 full time, and up to 4 part-time jobs, including at least

10 in the Cultivation process.

We are committed to providing a better quality of life for our customers, through alternative health resources in a professional and compassionate environment, while improving the community through charitable events and services. Aided by education, mutual respect and positive encouragement, “Eddie’s Flowers, Inc.”, will ensure that customers who enter our center will experience a feeling of security, belonging and well-being.

We will adhere to strict policies and procedures that ensure compliance and transparency in our operations, as well as safety for customers, employees, and community. We will provide only the safest, highest-quality products, featuring rigorous processing, testing, and secure and professional packaging. Our staff will be well trained in applying our care philosophy and we will strive to meet our customers’ needs with respect and compassion. We will add value to our community through acts of service, educational offerings, charitable donations, active civic participation and providing free and reduce cost medicine to veterans.

Our unique mix of experience and commitment will enable “Eddie’s Flowers, Inc.” to be a constant and consistent provider in meeting the needs of the patient community and improving the quality of life for these patients and those around them.

Service Area

The recreational marijuana industry is still in its infancy and is relatively undeveloped compared to most industries. The market is characterized by local culture, with entities taking form based on the social climate of the communities in which they are located.

Community Safety

The building and surrounding areas will be monitored at all times to prevent loitering and any other potential disturbances to the quiet enjoyment of the neighbors and surrounding businesses. Our operating plan carefully considers traffic management; we will always work diligently to ensure we minimize traffic congestion in the area.

We do not expect that we will experience any undue threats to the security of our facility, our product, our employees, or our prospective patrons. In fact, speculation that marijuana establishments lead to increased crime rates has been largely discredited by empirical and statistical analyses by research and law enforcement agencies.

We anticipate, given our commitment to being model community members and our world-class operating standards, our marijuana establishment will contribute positively to the safety and security of the area surrounding our facility.

In keeping with our commitment to community, we will implement “responsible neighbor” trainings for our staff emphasizing sensitivity to the concerns of neighbors, and will require our staff and patients to adhere to a code of neighborhood conduct. Violation of our good neighbor policies can result in discipline, up to and including termination of employment for a staff member or termination of a patient’s establishment access.

We will continue to work with community stakeholders, public safety agencies, health care professionals and city officials to ensure that the community is confident that we will be a responsible marijuana operator who can add social value and serve as a good neighbor.

Cultivation Process

We will use grow bags placed in side-rolling 4 x 8 Ft trays to minimize unproductive walkways thereby increasing the grow area. Soil mixes will be tested for nutrient analysis and safety at the UMass Soil and Plant Tissue Analysis lab. Assuming this analysis is okay then plants will initially be grown from seed in a nursery area as soon as authorized by the Cannabis Control Commission. Organic potting soil or similarly benign and tested potting soil constituted from compost and other commonly used ingredients such as “Promix” which is used to increase media porosity will be used for growing seedlings. The seedlings will be transplanted into the grow bags in each grow room. Later “mother plants” will be used to produce clones from superior plants grown from seed. These mother plants will be maintained in a vegetative growth state for clones to have the best producing genetics and to minimize the purchase of seed which can introduce variability in material grown.

The planned tasks of propagation, growing plants to maturity, and cloning will follow practices that are consistent with The Massachusetts Department of Agricultural Resource (MDAR) guidelines. Staff on site will be trained to adhere to the Cannabis Control Commission regulations as well as adhering to MDAR crop growing criteria. A cultivation plan adhering to the principles of MDAR guidelines will be followed in each cultivation cycle. All operations will be in full compliance with 935 CMR 500.101 (1) (c) for marijuana cultivation.

Before entering the secure cultivation area all workers will pass through a clean room to minimize and hopefully eliminate any pests and diseases. The cultivation area will be monitored daily for crop growth, nutrient and water need by the chief growers (DOC and COO). The plants will be irrigated with a trickle irrigation system designed to reduce water usage, and the system will allow automated fertilization with soluble nutrients. Irrigation water will be drawn from two deep wells on the proposed site. All and individual plants will be incorporated into a computer record complying with any Cannabis Control Commission guidelines from seed or transplant through to maturity and sale to end user Marijuana Establishments (retail and/or manufacturers).

At maturity marijuana plants will be cut and hung to dry then trimmed on two state of the art trimming machines each of different styles that simulate hand trimming with scissors. Once

dried, trimmed and cured the packaged marijuana will be delivered to the end retailer or manufacturer.

Policies and Procedures of Cultivation

The Cultivation wing is meticulously climate controlled differently for each room, determined by order of the Cultivation Director. Vegetative and bloom rooms are also use safe levels of supplemental CO₂; controlled in specific PPM to induce accelerated growth of the plants.

Beginning in our propagation rooms and cared for by our Propagation Teams our seeds will be germinated in either the industry standard of biodynamic grow plugs or Rockwool cubes. Clones will be rooted in Aeroponic cloning machines, which is a bin topped with neoprene discs that are cut to hold a plant cutting, which is sprayed on the cut end from the inside of the bin by drip irrigation sprayers.

Clones are also produced by our Tissue Culture Teams, which grow clones out of plant material in Petri dishes in a lab environment until rooted. The facility also has the option of transferring clones from outside the facility, in batches of a maximum of 100 clones per batch. Once sprouted seeds or rooted clones grow to a height of 8 inches, the plant is given a METRC tag containing a barcode and SKU number to be entered into the system. Any additives used in growing the plants are also entered into the METRC system. Tagged plants are grown to vegetative ready size, depending on the strain, and once at desired height, moved into the vegetative room for further growth.

As they are moved this transition is recorded into the METRC database. Now these clones are inserted into our normal growing systems. Here they are cared for by our Vegetative Teams until reaching the ideal height for flowering, depending on the strain. Plants are pruned as needed before moving into the flower rooms, with weight of waste recorded strain by strain in batches with Data being entered into METRC, Waste is then moved to our Waste Room, to be dealt with later according to state regulations. Once reaching strain appropriate height, our vegetative team records the transfer of the plants into the METRC Database, and the plants are ready to be moved with the net pot they have been grown in, and moved into a similar site in their desired section of the Bloom Room.

Under close care of our Bloom Cultivation Team, our plants are now ready to begin the flowering process. This is induced by adjusting our lighting to an equal split of twelve hours of light and darkness. Now our plants begin to flower for a period that lasts anywhere from roughly 7-12 weeks, (10 on average) depending on the strain before harvest.

Plants are pruned throughout harvest at the discretion/schedule of the Bloom Cultivation Team, and all waste is recorded into METRC and disposed of in the waste room, to again be dealt with according to state regulations. Once each grow supervisor determine that plants are ready for harvest, each plant is cut and weighed wet, with data entered into METRC.

Under supervision of our Dry/Cure team, the plants, separated into batches, can be cut apart, removing the largest stems and remaining fan leaves from small stems to be weighed, with data recorded in METRC to be taken as well to the waste room. The remaining small stems attached to us trimmed flowers are hung in climate-controlled cure/dry room vaults with the rest of their batch until dry enough to trim. Once dry the whole batch is weighed again with data entered into METRC.

The batches are moved to trim rooms and trimmed by our Trimmer Teams overseen by Dry/Cure Assistants, with flowers separated by hand and mechanical trim machines from the trim and remaining stems. Stems are weighed as waste and data put into METRC before going to waste rooms, and flower and trim are weighed and entered into the database as well before being stored separately in our Dry/Cure Vaults.

Batches are then separated into smaller batches to go out to testing. METRC requires that transport route be recorded exactly without deviation to and from the testing facility. Upon returning from the facility the product is now stored in vaults outside of the cultivation wing, to be recorded again into METRC, and is ready to be stored until transfer to retail or wholesale.

Personal Protective Gear (PPE)

All employees will be required to attend OSHA 10 certification classes in order to properly use PPE in our facility.

Based on industry recommendations, including OSHA, we plan on requiring appropriate eye, hand, hearing, respiratory, and ultraviolet radiation personal protective equipment.

Grow light exposure will also mandate use of UV protective glasses meeting requirements of ANSI Z87.1-1989. Protective goggles meeting the same requirements will be required for any nutrient or pesticide mixing, trim machine operators or concentrate extractors.

UV protection beanies, shirts, and facemasks for all Cultivation workers exposed to any grow lights. In areas with possible nutrient or chemical exposure, appropriate use of long sleeve laboratory coats, coveralls, or aprons will be required.

Hand protection will consist of appropriate length nitrile gloves for nutrient mixing, application of chemicals, pesticides, and fungicides. Nitrile gloves are also required for solvent use and any cleaning process. Cut resistant gloves are required for pruning, manual trimming, and automated trim machine operation.

Any personnel exposed to a decibel level deemed hazardous in the facility will be required to use OSHA approved hearing protection (earplugs or earmuffs)

If an exposure assessment determining the need for respiratory PPE beyond a paper face mask, a NOISH certified respirator will be used in context of a written respiratory protection program for medical clearance, fit testing, and proper use and storage.

Staffing plan and staffing records in compliance with 935 CMR 500.105(9);

Cultivation Personnel- In addition to the Cultivation Manager, the cultivation facility will employ sufficient personnel to maintain the growth process.

Security Associate - Works as a member of the security team to implement security policies and procedures to protect the property, confidentiality and assets from theft, damage or acts of vandalism; acts as a visible resource for the responsible and secure operation of the facility, interacting with customers and staff in a positive manner, while maintaining compliance with establishment rules of conduct and state laws and regulations.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems.

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility. During the day-to-day operations and security manager supervisor will oversee these functions. In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security staff and performing the duties
- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design
- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and
- Using recognized best security practices, adhere all security related rules as described in the regulations

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The licensee will contract with a licensed bonded and insured professional security agency to fill

the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry

Staffing

The facility will be staffed by security officer with the dispensaries open. This includes weekends holidays and evenings.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police officers.

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- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple issues.
- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Eddie's Flowers, Inc. will also coordinate its security efforts with local law enforcement.

Delivery Plan

Marijuana infused products are delivered in “ready for sale” packaging. All product deliveries will take place at varied times to deter predictability. Product delivery days will be randomly scheduled on a “just in time” basis to minimize product requiring storage on site. The vehicle will enter our secure, loading area in the rear of the facility. All deliveries are made in our secure Sally Port, and completed under the watchful eye of our video surveillance system and Security Associate.

Inventory Control

Eddie’s Flowers, Inc. has developed detailed Inventory policies and procedures based on best practices in the recreational marijuana industry.

Bulk packaged, inventoried marijuana flowers and preparations, will be stored in a vault within the Inventory department equipped with adequate lighting, ventilation, and temperature and humidity controls.

In addition to being guarded by biometrics locks, keypad access codes, and digital inventory logs, the vault will be monitored 24/7 by remote access camera monitors and by our security services provider and digitally recorded and indexed for review.

Marijuana and marijuana products in the vault will not be removed until needed for transfer or sale. Any marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or for which the containers or packaging have been opened or breached, will be stored in a separate, locked and enclosed “Destroy Box” within the vault until destruction.

Seed-to-Sale Tracking

For inventory management, among other things, Eddie’s Flowers, Inc. plans to utilize METRC. METRC is a fully integrated Point of Sale (POS), Inventory Control, Growhouse Tracking, and Patient/Customer Management system and is one of the only complete seed-to-sale systems available on the market today. This software has been specifically designed to serve registered marijuana dispensaries and is used in the recreational field as well.

From an inventory control perspective, METRC supports ordering, receiving, storing, sales, adjustments, labeling, disposal of unusable medicine, and audits. METRC fully supports the recording and tracking of the daily beginning inventory, daily ending inventory, acquisitions, harvests, sales, disbursements, and disposal of

unusable marijuana. Records are retained indefinitely. It is a true seed-to-sale POS solution.

Robust inventory reports in the POS system show current inventory levels. Each product has a unique transaction history that shows every sale and addition/removal from inventory, as well as a date/time stamp and the user ID of the establishment agent who executed the transaction.

The General Manager will conduct and document an audit of the establishment's inventory, using generally accepted accounting principles, at least once every 30-calendar days. At a minimum, per regulations, documentation will include the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory. (Our inventory counts will reflect a great deal more information.)

Should any material reduction in the amount of marijuana in the establishment's inventory occur, Eddie's Flowers, Inc. will determine where the loss has occurred and take and document corrective action. All losses and/or disappearances must be reported to the Security Manager to determine whether an Incident Report is required.

In addition to a Monthly Inventory Count, the General Manager conducts a Vault Count once a week. The Vault Count is a physical count of all inventory contained in the vault and helps maintain stricter controls and resolve potential problems more quickly.

Our staff will also perform a physical inventory count of all product on the inventory shelf reconciled by the General Manager with the Inventory Shelf Report. The Inventory Shelf Report is a custom POS report that takes the stocked amount – total amount moved from location A (the vault) to location B (the inventory shelf at the service counter) – and subtracts sales. (The Inventory Shelf Report does not include medicine in the vault, as that will be physically counted once a week and compared to the Inventory Vault Report.)

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for

staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and distribution policies and procedures, as required by 935 CMR 500.000 et seq.

Inventory records as required by

- Seed-to-sale tracking records for all marijuana and MIPs as required.
- Personnel records that include job descriptions, a personnel record for each agent that includes a copy of the agent application submitted to CCC, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all CORI reports obtained in accordance with 935 CMR 500.000 et seq.
- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information
- Waste disposal records as required by 935 CMR 500.000 et seq.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Employee Training

Eddie's Flowers, Inc. has a comprehensive training curriculum that instructs department managers how to train staff members, and ensure comprehension and performance levels by using a Final Performance Test for each employee. The Final Performance Tests are comprised of demonstrable and measurable skills and knowledge required to perform basic job functions as identified in job descriptions. All employees will be required to pass a Final Performance Test before being moved out of their probationary employment period.

The overall training curriculum is comprised of Leader's Guides, which provide scripts for teaching all of the policies and procedures contained in the Operations Manuals and Trainee Workbooks that serve as a resource for each new hire during his or her training period. The training tools reference our Operations Manuals and operational supplements so that all employees are consistently and properly trained.

These training references to official operational content reinforce employees' understanding that all policies and procedures are found in the Operations Manuals and operational supplements should they ever have questions.

The training curriculum also provides Quizzes and Daily Recaps to ensure the retention of detailed learning and performance objectives throughout the training process. All training is documented and filed in each employee's human resource file securely located in the GM's office.

All employees go through Orientation Training, Safety Training, and Medical Training, irrespective of department. Upon completion of those modules, employees then complete their respective departmental training programs that cover all of the policies, procedures, knowledge, and skills required to operate effectively and in full compliance within the respective departments.

Eddie's Flowers, Inc.'s Orientation training module will generally be conducted by the GM. The following is covered during Orientation:

- Welcoming of the new hire
- Completion of paperwork and administrative tasks such as assigning POS logins, email addresses, etc.
- Review of the Establishment Handbook
- Review of the Employee Handbook, detailed instruction, and quiz
- Review of the Safety Handbook
- Legal training, including all state and federal laws relating to marijuana and marijuana, legal obligations of licensed marijuana entities, rules and regulations of the establishment, sexual harassment (no tolerance), effective interaction with law enforcement personnel, and the rights and responsibilities of marijuana patients
- Tour of the facilities and introductions to fellow staff
- Injury & Illness Prevention Program

Safety training immediately follows Orientation Training and will be conducted by a member of the Security management team. In addition to its focus on safety, safety training will include acceptable currency identification and counterfeit detection, warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution techniques, and diversion detection techniques.

Medical Training will be conducted by Eddie's Flowers, Inc.'s Medical Director (William Cristo, Jr.) Medical Training may be conducted at any point in the employee's initial training period so long as it is completed before the employee's Final

Performance Test.

Medical Training topics will include:

- Rights of and sensitivity toward disabled individuals
- How to identify and interact with a customer having a medical emergency
- Marijuana Risks & Benefits Training
- Cannabis Use Patterns and the Detection of Dependence
- How to effectively refuse marijuana to patients who appear impaired or abusing marijuana

**Only authorized establishment agents who have been trained on privacy and recordkeeping policy and procedures will have access to Eddie's Flowers, Inc.'s records.

In addition to associate level training, all management level employees including members of the Executive Management Team are required to successfully complete a week-long, 8-hour a day, intensive management training course conducted by industry experts and other seasoned professionals with expertise in areas of management (HR, legal, financial, medical, etc.).

At a minimum staff will receive 8 hours of ongoing training each year, but generally much more.

Substance Abuse and Misuse Counseling/Training

We recognize the need to provide a safe environment that helps customers avoid substance abuse and misuse. Our employee-members will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependence and withdrawal. In our workshops, clinics and materials, we will emphasize personal responsibility for individual behavior. We will also provide information about the differing strengths of marijuana strains and products, as well as the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, nonprescription drugs, and supplements. Finally, working with our managers, customer education about the potential abuse of marijuana will be integrated in all patient visits, materials and outreach.

Diversion and Unsafe Practices

Any marijuana establishment agent who has:

Diverted marijuana shall be reported to law enforcement officials and to the Commission; or

Engaged in unsafe practices with regard to operation of the Marijuana Establishment, shall 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 shall be reported to the Commission.

Said employee shall be subject to immediate dismissal for any of the above infractions.

Storage of Marijuana in Compliance with 935 CMR 500.105(11);

Eddie's Flowers, Inc. will store all finished marijuana product in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie's Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will construct steel vaults. We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. We will keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. We will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;

Eddie's Flowers, Inc. will offer proprietary strains offering particular benefits for specific ailments. There are too many particular strains available to mention individually. However, marijuana consists of two basic strains, Sativa and Indica, with most marijuana being comprised of various combinations of Indica and Sativa, or hybrids.

Our products will be sold in flower form, and in various products using THC and CBD extracted from flower by Hydrocarbon, Distillate, and CO 2 Extraction.

Products and flowers with various combinations of THC and CBD are used to treat various conditions. We will provide a variety of products depending on a customer's needs and will even custom manufacture product to a customer's specifications.

Cancer

The traditional treatment of cancer has consisted of chemotherapy and radiation, which basically prolongs life by slowing down the progress of cancers, but does not control the progress.

Eddie's Flowers, Inc. will be offering programs for cancer patients including offering "Rick Simpson Oil" as a supplement or complete alternative to traditional cancer treatment. Cannabis flowers are soaked and distilled in alcohol, leaving a highly concentrated oil, of which the customer will take small daily doses. Rick Simpson Oil, or "RSO" is believed to actually stop the growth of cancer cells. While not totally eliminating cancer, RSO is believed to manage cancer, allowing patients to lead a normal life.

Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and distribution policies and procedures, as required by Inventory records as required by
- Seed-to-sale tracking records for all marijuana and MIPs as required in
- Personnel records that include job descriptions, a personnel record for each establishment agent that includes a copy of the establishment agent application submitted to DPH, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all

CORI reports obtained.

- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information
- Waste disposal records as required by the Commonwealth.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle

Quality control, including product testing for contaminants in compliance with 935 CMR 500.160;

Testing of Marijuana and Marijuana Products

The establishment shall have all marijuana products tested. Said testing performed by an Independent Testing Laboratory in compliance with the *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana-infused Products*, as amended in November, 2016, published by the DPH. Testing of environmental media (*e.g.*, soils, solid growing media, and water) shall be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Marijuana Dispensaries* published by the DPH.

In the event that laboratory results indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1), the establishment shall notify the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification must be from both Eddie's Flowers, Inc. and the Independent Testing Laboratory, separately and directly. The notification from the Marijuana Establishment will state that it has developed a detailed plan for disposing damaged or excess plants or products. All waste, including that containing in whole or part finished marijuana and MIPs, will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. We will store such

waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer than two establishment agents.
- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.
- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

- (1) The Marijuana Establishment shall maintain the results of all testing for no less than one year;
- (2) The sale of seeds is not subject to these testing provisions.

- (3) Clones are subject to these testing provisions, but are exempt from testing for metals.
- (4) All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13).
- (5) All storage of marijuana at a laboratory providing marijuana testing services shall comply with 935 CMR 500.105(11);
- (6) All excess marijuana must be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to the source Marijuana Establishment for disposal or by the Independent Testing Laboratory disposing of it directly; and
- (7) No marijuana product shall 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.

Record Keeping

Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions are listed above and will be kept in the usual course of business.

A personnel record for each marijuana establishment agent 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:

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

A staffing plan (see above) 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.

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.

Waste disposal records as required under 935 CMR 500.105(12); and

Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;

Following closure of the Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission. (A bond in the amount of the Establishment's license fee will be placed to ensure the proper destruction of marijuana and marijuana related products upon dissolution.)

Alcohol, smoke, and drug-free workplace

The workplace shall remain alcohol, smoke, and Drug Free. All employees are subject to random testing.

Confidential information

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Marijuana Establishment Agent Training

Eddie's Flowers, Inc. shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff shall receive eight hours of on-going training annually.

Requirements for the Handling of Marijuana

Eddie's Flowers, Inc. shall process the marijuana and related products in a safe and sanitary manner. Eddie's Flowers, Inc. shall process the leaves and flowers of the female marijuana plant only, which shall be:

- Well cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area.

All agents, including those that develop or process non-edible marijuana products, shall comply with the following sanitary requirements:

- Any marijuana establishment agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*;
- All agents working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including:
 - Maintaining adequate personal cleanliness; and
 - 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.
- Hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the Marijuana Establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
- There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
- Litter and waste shall be properly removed, 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 shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);

- Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
- There shall be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
- Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
- All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
- All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;
- The establishment's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;
- Plumbing shall 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 shall properly convey sewage and liquid disposable waste from the establishment. There shall be no cross-connections between the potable and waste water lines;
- Eddie's Flowers, Inc. shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
- Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and
- Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
- All 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).

Eddie's Flowers, Inc. shall comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*.

Energy Efficiency and Conservation

Eddie's Flowers, Inc. plans on implementing solar power to produce supplemental power and energy efficiency. We will be automating our lighting and heating/AC schedules in order to achieve maximum efficiency. Energy storage will be utilized from excess solar power generation. We are also speaking with our local power companies, exploring available demand reduction resources in compliance with M.G.L. c. 25 §21

Marketing and Advertising

Eddie's Flowers, Inc. has developed a logo that complies with 935 CMR 500.00 that will be used in labeling, signage, and other materials; there are no colloquial references to Marijuana in said logo.

We will not sponsor a charitable, sporting or similar event, except that advertising, marketing, and branding at or in connection with such an event is prohibited 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;

We will display, in secure, locked cases, samples of each product offered for sale and subject to the requirements of 935 CMR 500.110. These display cases will be transparent. We will also remove a sample of marijuana from the case and provide it to the consumer for inspection, provided the consumer may not consume or otherwise use the sample unless otherwise authorized herein.

The establishment will post prices in the store and may respond to questions about pricing on the phone.

The Establishment will engage in reasonable marketing, advertising and branding practices that are not otherwise prohibited in 935 CMR 500.105(4)(b) that do not jeopardize the public health, welfare or safety of the general public or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising and branding created for viewing by the public will include the statement "Please Consume Responsibly," in a

conspicuous manner on the face of the advertisement and shall include a minimum of two of the following warnings in their entirety in a conspicuous manner on the face of the advertisement:

“This product may cause impairment and may be habit forming.”

“Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of this drug.”

“There may be health risks associated with consumption of this product.”

“For use only by adults 21 years of age or older. Keep out of the reach of children.”

“Marijuana should not be used by women who are pregnant or breastfeeding.”

All marketing, advertising and branding produced by or on behalf of Eddie’s Flowers, Inc. will include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½)(xxvi): “This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA.”

The following advertising, marketing, and branding activities will not be conducted pursuant to 935 CMR 500.105:

- advertising, marketing, and branding in such a manner that is deemed to be deceptive, false, misleading, or untrue, or tends to deceive or create a misleading impression, whether directly, or by ambiguity or omission;
- 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; Eddie’s Flowers, Inc. will use media such as The Advocate, and radio that have proven audiences, 85% of which are 21 or older.
- advertising, marketing, and branding that utilizes statements, designs, representations, pictures or illustrations that portray anyone younger than 21 years old;
- 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;
- advertising, marketing, and branding, including statements by a licensee, that makes any false or misleading statements concerning other licensees and the conduct and products of such other licensees;

- advertising, marketing, and branding through certain identified promotional items as determined by the Commission including, but not limited to, gifts, giveaways, coupons, or “free” or “donated” marijuana;
- advertising, marketing, and branding by a licensee that asserts that its products are safe, or represent that its products have curative or therapeutic effects, other than labeling required pursuant to M.G.L. c. 94G, § 4(a½)(xxvi), unless supported by substantial evidence or substantial clinical data with reasonable scientific rigor as determined by the Commission;
- installation of any neon signage or any illuminated external signage which fails to comply with all local ordinances and requirements;
- installation of any external signage that is illuminated beyond the period of 30 minutes before sundown until closing;
- the use of vehicles equipped with radio or loud speakers for the advertising of marijuana;
- the use of radio or loud speaker equipment for the purpose of attracting attention to the sale of marijuana;
- 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;
- operation of any website that fails to verify that the entrant is 21 years of age or older;
- use of unsolicited pop-up advertisements on the internet;
- any advertising, marketing, and branding materials for marijuana products that fails to contain the standard health warning developed by the DPH;
- 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;
- 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;
- advertising, marketing or branding on or in public or private vehicles and at bus stops, taxi stands, transportation waiting areas, train stations, airports, or other similar transportation venues including, but not limited to, vinyl-wrapped vehicles or signs or logos on transportation vehicles or company cars;
- 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;
- advertising or marketing of the price of marijuana products, except that Eddie’s Flowers, Inc. shall provide a catalogue or a printed list of the prices and strains of marijuana available at the Establishment to consumers and may post the same catalogue or printed list on its website and in the retail store; and display of marijuana products so as to be clearly visible to a person from the exterior of the Marijuana Establishment.

Waste Disposal

All waste, including that containing in whole or part finished marijuana and MIPs, will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. Eddie's Flowers, Inc. will store such waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer than two establishment agents.
- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.
- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

Transportation of Marijuana and Marijuana Related Products

General Requirements.

1. A licensed Marijuana Establishment shall, as an element of its license, be licensed to transport its marijuana products to other licensed establishments, except as otherwise provided herein.
2. Marijuana products may only be transported between licensed Marijuana Establishments by registered marijuana establishment agents.
3. A licensed Marijuana Transporter may contract with a licensed Marijuana Establishment to transport that licensee's marijuana products to other licensed Marijuana Establishments.
4. The originating and receiving licensed Marijuana Establishments shall ensure that all transported marijuana products are linked to the seed-to-sale tracking program. For the purposes of tracking, seeds and clones will be properly tracked and labeled in a form and manner determined by the Commission.
5. Any marijuana product that is undeliverable or is refused by the destination Marijuana Establishment shall be transported back to the originating establishment.
6. All vehicles transporting marijuana products shall be staffed with a minimum of two marijuana establishment agents. At least one agent shall remain with the vehicle at all times that the vehicle contains marijuana or marijuana products.
7. Prior to leaving a Marijuana Establishment for the purpose of transporting marijuana products, the originating Marijuana Establishment must weigh, inventory, and account for, on video, all marijuana products to be transported.
8. Within eight hours after arrival at the destination Marijuana Establishment, the destination establishment must re-weigh, re-inventory, and account for, on video, all marijuana products transported.
9. When videotaping the weighing, inventorying, and accounting of marijuana products before transportation or after receipt, the video must show each product being weighed, the weight, and the manifest.
10. Marijuana products must be packaged in sealed, labeled, and tamper or child-resistant packaging prior to and during transportation.
11. In the case of an emergency stop during the transportation of marijuana products, a log must be maintained describing the reason for

the stop, the duration, the location, and any activities of personnel exiting the vehicle.

12. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transportation times and routes are randomized.

13. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transport routes remain within the Commonwealth.

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

(b) Reporting Requirements.

1. Marijuana establishment agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours of the discovery of such a discrepancy.

2. Marijuana establishment agents shall 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 of such accidents, diversions, losses, or other reportable incidents.

(c) Vehicles.

1. A vehicle used for transporting marijuana products must be:

a. owned or leased by the Marijuana Establishment or the Marijuana Transporter;

b. properly registered, inspected, and insured in the Commonwealth (documentation of such status shall be maintained as records of the Marijuana Establishment or the Marijuana Transporter, and shall be made available to the Commission upon request);

c. equipped with an alarm system approved by the Commission; and

d. equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana products.

2. Marijuana products must not be visible from outside the vehicle.

3. Any vehicle used to transport marijuana products shall not bear any markings indicating that the vehicle is being used to transport marijuana products, and any such vehicle shall not indicate the name of the Marijuana Establishment or the Marijuana Transporter.

4. When transporting marijuana products, no other products may be transported or stored in the same vehicle.

5. No firearms may be located within the vehicle or on a marijuana establishment agent

(d) Storage Requirements.

1. Marijuana products must be transported in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana

products.

2. The storage compartment must be sufficiently secure that it cannot be easily removed.

3. If a Marijuana Establishment, pursuant to a Marijuana Transporter License, or a Marijuana Transporter is transporting marijuana products for more than one Marijuana Establishment at a time, the marijuana products for each Marijuana Establishment shall be kept in a separate locked storage compartment during transportation and separate manifests shall be maintained for each Marijuana Establishment.

4. If a Marijuana Establishment is transporting marijuana products to multiple other establishments, it may seek the Commission's permission to adopt reasonable alternative safeguards.

(e) Communications.

1. Any vehicle used to transport marijuana products shall contain a global positioning system (GPS) monitoring device that is:

- a. not a mobile device that is easily removable;
- b. attached to the vehicle at all times that the vehicle contains marijuana products;
- c. monitored by the Marijuana Establishment or Marijuana Transporter during transport of marijuana products; and
- d. inspected by the Commission prior to initial transportation of marijuana products, and after any alteration to the locked storage compartment.

2. Each marijuana establishment agent transporting marijuana products shall have access to a secure form of communication with personnel at the originating location at all times that the vehicle contains marijuana and marijuana products.

3. Secure types of communication include, but are not limited to:

- a. two-way digital or analog radio (UHF or VHF);
- b. cellular phone; or
- c. satellite phone.

4. When choosing a type of secure communications, the following shall be taken into consideration:

- a. cellular signal coverage;
- b. transportation area;
- c. base capabilities;
- d. antenna coverage; and
- e. frequency of transportation.

5. Prior to, and immediately after leaving the originating location, the marijuana establishment agents shall use the secure form of communication to contact the originating location to test communications and GPS operability.

6. If communications or the GPS system fail while on route, the marijuana establishment agents transporting marijuana products must return to the originating location until the communication system or GPS system is operational.

7. The marijuana establishment agents transporting marijuana products shall contact the originating location when stopping at and leaving any scheduled location, and regularly throughout the trip, at least every 30 minutes.

8. The originating location must have a marijuana establishment agent assigned to monitoring the GPS unit and secure form of communication, who must log all official communications with marijuana establishment agents transporting marijuana products.

(f) Manifests.

1. A manifest shall be filled out in triplicate, with the original manifest remaining with the originating Marijuana Establishment, a second copy provide to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transportation.

2. Prior to transport, the manifest shall be securely transmitted to the destination Marijuana Establishment by facsimile or email.

3. Upon arrival at the destination Marijuana Establishment, a marijuana establishment agent at the destination Marijuana Establishment shall compare the manifest produced by the agents who transported the marijuana products to the copy transmitted by facsimile or email. This manifest must, at a minimum, include;

- a. the originating Marijuana Establishment name, address, and registration number;
- b. the names and registration numbers of the agents who transported the marijuana products;
- c. the name and registration number of the marijuana establishment agent who prepared the manifest;
- d. the destination Marijuana Establishment name, address, and registration number;
- e. a description of the marijuana products being transported, including the weight and form or type of product;
- f. the mileage of the transporting vehicle at departure from originating Marijuana Establishment and mileage upon arrival at destination Marijuana Establishment, as well as mileage upon return to originating Marijuana Establishment;
- g. the date and time of departure from originating Marijuana Establishment and arrival at destination Marijuana Establishment for each transportation;
- i. a signature line for the marijuana establishment agent who receives the marijuana products;
- j. the weight and inventory before departure and upon receipt;
- k. the date and time that the transported products were re-weighed and re- inventoried;
- l. the name of the marijuana establishment agent at the destination

Marijuana Establishment who re-weighed and re-inventoried products;
and

m. the vehicle make, model, and license plate number.

4. The manifest shall be maintained within the vehicle during the entire transportation process, until the delivery is completed.

5. A Marijuana Establishment shall retain all transportation manifests for no less than one year and make them available to the Commission upon request.

(g) Requirements for Agents.

1. Each employee or agent transporting or otherwise handling marijuana products for a Marijuana Transporter must 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 the Marijuana Transporter prior to transporting or otherwise handling marijuana products.

2. A marijuana establishment agent shall carry his or her registration card at all times when transporting marijuana products, and shall produce his or her registration card to the Commission or law enforcement officials upon request.

(h) Marijuana Transporters shall use best management practices to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts.

(2) Access to the Commission, Emergency Responders and Law Enforcement.

(a) The following individuals shall have access to a Marijuana Establishment or Marijuana Establishment transportation vehicle:

1. Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000;

2. Representatives of other state agencies of the Commonwealth; and

3. Emergency responders in the course of responding to an emergency.

(b) 935 CMR 500.000 shall not be construed to prohibit access to authorized law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.

(3) Energy Efficiency and Conservation. A marijuana establishment must demonstrate consideration of the following factors as part of its operating plan and application for licensure:

(a) Identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities;

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

- (c) Strategies to reduce electric demand (such as lighting schedules, active load)

Odor Control/Air Purification

One must constantly be conscious of the presence of mold spores within the facility in order to ensure the safety of both the employees and those who depend on product. Proper air purification is necessary to remove mold spores and strong odors from the air. Eddie's Flowers, Inc. will use a commercial air purification system. It is critical to choose one that can reduce VOCs/Vocarbs (Volatile Organic Compounds), and has a carbon filter or another equivalent filtration medium to reduce VOCs. Ours is triple tier.

There are two primary reasons that marijuana establishments need air purification systems. The first is simple grow/show room odor control, as the odor of a large number of cannabis plants, or loose, unsealed flower, together can become overpowering for those working in a establishment environment when left unchecked. The second, and even more important reason, is that grow rooms and marijuana establishments not equipped with air purifiers are likely to develop mold or mildew problems, which can spoil entire crops, and ruin product. Given these applications, an air purifier must be able to remove both odors and the tiny spores that spawn mold and mildew on the plants.

The odors will mainly result from marijuana flower exposed to the air. This will require use of the system on a continuous basis. The carbon filter will be changed as required by the unit manufacturer. The air will be periodically tested to detect mold and other contaminants at least once per week.

SPECIFIC ODOR CONTROL PLAN

1. **Each room in the facility will be fitted with activated carbon filters** sized for optimum performance according to manufacturing specifications. Using these filters is the industry standard of approved control when utilized in a sealed environment like we have in our facility. They use fans to pull air through metal casing packed with small pieces of activated carbon. Odor and contaminants are trapped in tiny pores across each piece of carbon leaving the air scrubbed clean.
2. **Each room will be fitted with an air neutralizer** designed for use in the NASA space program. This neutralizes negatively charged ions present in the air. This makes them attracted to particles such as odor bacteria, fungus, and other contaminants, and neutralizes them on contact. This effect also sanitizes every surface cracks and crevice in a room in which they are installed. This on its own cancels out odor, and by neutralizing

bacteria and fungus, is preventative control against mold, powdery mildew, and plant diseases. The extra sterilization also helps lab environments necessary for tissue culture and cloning.

3. **A 5 tier filtration system** will also be mounted in each room. The air flows through an activated carbon prefilter that filters out lint and large particles. The second filter is a heap filter that filters out particles down to .3 micron. The third is two UVC ultraviolet filters that kill all mold, bacteria, fungus, and allergens. That works with the fourth, a Photocatalytic Oxidation Filter(POF). The organic matter killed by the UVC (mold, bacteria, fungus, viruses, allergens) is transformed by the photocatalytic oxidation filter by a chemical reaction into carbon dioxide and water. The last filter is a potassium permanganate filter that filters any remaining gasses or traces of odor causing compounds from the air. This filter also is an amazing preventative measure against mold or powdery mildew contamination in the gardens and product.

4. **Our Cultivation building exterior is sealed with an airlock entry**, as well as our separate cultivation wing to keep in odor, and keep out pests, and any diseases or contamination. Each airlock contains an air shower that blows off any microscopic pests, mold or fungus that might travel in on the clothes of employees or float in the air. The second airlock in the cultivation room leads into a locker room where employees shower and change into company uniforms/protective this further insures that no contaminants, pests, or disease hitch a ride into our gardens. Each room inside the cultivation facility is also sealed with air curtains, a small air shower usually installed over doorways. This keeps air from either side from crossing each threshold and is an extra measure against contamination of any kind getting in or out.

It goes without saying that our above odor plan and three layers of sealed facility is also prevention against insect, powdery mildew, and mold infestation. In the unlikely event that any contamination happens in our facility, pest or otherwise, any pesticides or fungicides applied will be in compliance with M.G.L.c 132B, and regulations in 333 CMR 2.00 through CMR 14.00.

500.300: Inspections and Compliance

- (1) The Commission or its agents may inspect a Marijuana Establishment and affiliated vehicles at any time without prior notice in order to determine the Marijuana Establishment's compliance with St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000. All areas of a Marijuana Establishment, all marijuana establishment agents and activities, and all records are subject to such inspection. Acceptance of a license by a Marijuana Establishment constitutes consent for such inspection.
- (2) Eddie's Flowers, Inc. shall immediately upon request make available to the Commission all information that maybe relevant to a Commission inspection, or an investigation of any incident or complaint.

(3) Eddie's Flowers, Inc. shall make all reasonable efforts to facilitate the Commission's inspection, or investigation of any incident or complaint, including the taking of samples, photographs, video or other recordings by the Commission or its agents, and to facilitate the Commission's interviews of marijuana establishment agents.

(4) An inspection or other investigation may be made prior to the issuance of a license or renewal of registration. Additional inspections may be made whenever the Commission deems it necessary for the enforcement of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000.

(5) During an inspection, the Commission may direct a Marijuana Establishment to test marijuana for contaminants as specified by the Commission, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides not approved for use on marijuana by the Massachusetts Department of Agricultural Resources.

500.310: Deficiency Statements

After an inspection in which a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000, is observed or a violation is otherwise determined to have occurred, the Commission shall issue a deficiency statement citing every violation identified, a copy of which shall be left with or sent to the Marijuana Establishment.

500.320: Plans of Correction

(1) A Marijuana Establishment shall submit to the Commission a written plan of correction for any violations cited in the deficiency statement issued pursuant to 935 CMR 500.310 within ten business days after receipt of the statement.

(2) Every plan shall state, with respect to each deficiency, the specific corrective step(s) to be taken, a timetable for such steps, and the date by which compliance with 935 CMR 500.000 will be achieved. The timetable and the compliance dates shall be consistent with achievement of compliance in the most expeditious manner possible.

(3) The Commission shall review the plan of correction for compliance with the requirements of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000, and shall notify the Marijuana Establishment of either the acceptance or rejection of the plan.

(4) An unacceptable plan must be amended and resubmitted within five business days after receipt of such notice.

Timeline

We will be operational within 60-90 days of final approval by the state and the local licensing authorities.

Equity

Eddie's Flowers, Inc. is dedicated to addressing the disparate impact that cannabis enforcement has had on the community's minority, and less economically fortunate residents. Eddie's Flowers, Inc. shall focus heavily on hiring from those communities and will commit resources to training them in all aspects of the legal cannabis industry.

Eddie's Flowers, Inc. will not just educate, but empower the local community and our neighbors.

Employment

Eddie's Flowers, Inc.'s shareholders currently employ disabled persons, and have always ensured the proper framework was in place to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation, in the operation of our existing businesses.

Community Outreach

January 25, 2022 5:30 PM
Zoom

**Marijuana Review Team Application
Cannabis Manufacturing Facility
23 Rindge State Road, Ashburnham, MA**



Submitted by:
Eddie's Flowers, Inc.
David A Mech, Esq
1 Crescent Hill
Springfield, MA 01105
(413) 883-3471
Fax: (413) 732-4206
gignation@gmail.com

Introduction

Eddie's Flowers, Inc. ("Eddie's Flowers, Inc.") is a Massachusetts corporation requesting consideration to enter into a Host Community Agreement with the Town of Ashburnham, MA. Eddie's Flowers, Inc. desires to execute a Host Community Agreement for the development, construction and operation of a Marijuana Establishment within the Town, in accordance with applicable laws and regulations (935 CMR 500.101). Eddie's Flowers, Inc. will operate an establishment at 23 Rindge St. Rd., in Ashburnham, Massachusetts in a professional, efficient, and conscientious manner consistent with the stated goals of the town, and in full compliance with the regulations as promulgated by the Commonwealth of Massachusetts.

Eddie's Flowers, Inc. is proposing to create 25 new jobs for qualified Ashburnham residents as a result of its anticipated operation. Eddie's Flowers, Inc. is committed that our staff will be as diverse as our city. It is in the best interest of the town and the surrounding neighborhood to grant this license to secure the tax revenue remains local.

Eddie's Flowers, Inc. is a Springfield Massachusetts based company. Its officers and directors include minorities, and residents of disproportionately impacted neighborhoods.

As a local business, its shareholders strive to become leaders within the community and creating a positive impact. All those affiliated with Eddie's Flowers, Inc. are dedicated to creating a revolutionary, state of the art cannabis facility while striving to create a positive change to the neighborhood and the citizens of Ashburnham.

Eddie's Flowers, Inc. is proposing a fully integrated retail, manufacturing, and cultivation operation at one location. The location of this operation is adequate to accommodate such a facility in that it contains sufficient space for all operations without creating a detrimental impact to the immediate community. This proposal is an innovative approach to mitigate the epidemic of vacant storefronts and distressed properties.

Thank you for the opportunity to present this proposal and for your consideration in advance. Eddie's Flowers, Inc. looks forward to working with the Town of Ashburnham and its residents.

Sincerely,

/David A. Mech/

David A Mech, Esq.

Manufacturing Operations Plan

Operating Experience

Eddie's Flowers, Inc.'s Board of Directors and Officers are highly experienced non-profit, healthcare, marijuana, and business professionals. Most have developed and operate other cannabis projects within and outside of Massachusetts. The Directors and Officers are committed to operating within the regulatory standards and to develop as a model within the community.

People

Iyad Jamal, President
576 Main St.
Somers, CT 06071

Iyad, "Eddie" Jamal, at 34, is the American success story. Eddie began with one gas station in Somers CT, and, through hard work, and "long, long, hours", Eddie Jamal currently owns and operates 7 establishments in both Massachusetts (Holyoke), and Connecticut (Somers), (Plainville), (Manchester). In 2013, Jamal also started a successful Smoke Shop, in Somers, CT, "Bogeys" which also includes the sale of CBD products. The CBD industry is no different than the "Adult Use" Marijuana industry, in that, both are licensed through the Commonwealth of Massachusetts through the Cannabis Control Commission, (Marijuana), and the Department of Agriculture (CBD). The main difference is the THC content in the "flower". CBD contains less than .03 percent THC, and therefore is not FEDERALLY prohibited.

In Sum, under the direction of Eddie Jamal, Eddie's Flowers will help make Ashburnham, MA, the Massachusetts "Success Story".

David A. Mech, Esq., Secretary and General Counsel
1 Crescent Hill
Springfield, MA 01105

David Mech is a Massachusetts native, Springfield resident and Eddie's Flowers, Inc. Secretary. He has been involved all aspects of the medical cannabis industry. In 2010-2011, Mech consulted with medical cannabis patients and assisted them in forming patient cooperatives in Lake County, California, while also gaining hands-on cultivation experience in "The Emerald Triangle".

Mech was also involved in Arizona's medical cannabis industry from its inception, co-founding and providing legal representation for various cannabis establishments, including Arizona's Award winning "Level Up" Dispensary.

In 2012, David Mech founded one of the original medical cannabis certification facilities in Massachusetts' Pioneer Valley, Community Health Clinics, PLLC, along with Dr. William Cristo, Jr., introducing the concept "Coordinated Care" to physicians and encouraging them to work in unison when addressing the needs of "complex care" patients for whom medical cannabis is prescribed.

Mech and Cristo also developed Cannascan, a software application that included an online patient verification system linked with medical providers, which allowed law enforcement to verify a patient's status, before the Department of Public Health issued actual Patient ID Cards.

David is the president and founder of First Aid for our Troops, which since 2005 has helped soldiers and their families upon returning from the Middle East at Walter Reed Medical Center. Mech will also direct Security, hiring professionally trained personnel to ensure the safety of the public.

In earlier years, Mech worked for Burns Security for over ten years as a "special operator", working in whatever facility he was needed, including large corporations such as Connecticut Natural Gas, in Hartford. Mech has also litigated many establishment negligence cases, including liquor and other major safety violations, and is familiar with current premises security procedures.

Ruben Marques: Director of Manufacturing.

Ruben and his growing CBD company, Erva, is located in Boston's Jamaica Plain section. Jamaica Plain is a "disproportionately impacted" community, where, Marques and Erva have thrived, despite the many challenges faced. Erva's Mission Statement is as Follows:

Erva creates top-of-the-line wellness products from hemp, grown completely naturally and organically, utilizing the various cannabinoids available in the herb to address a wide variety of ailments that affect our society today. Erva stands for whole-plant, solvent free infusions, rather than extractions that utilize solvents. This is a unique approach to processing which aligns with Erva's philosophy of providing community access to the cleanest and purest possible healing hemp products, while keeping our body, soul and environment's health in mind.

Erva, which started its practice in early 2018, has from the beginning participated in community outreach and has helped organize and curate hundreds of small educational gatherings and events bringing like minded people together by providing a safe space for discourse and the sharing of holistic ideas.

Currently, during the Covid-19 pandemic, Erva has shifted its focus to helping the public and especially front-line workers at hospitals to fight the spread of the virus by providing CBD infused hand sanitizers to those who need it. To date Erva has donated over a thousand hand sanitizers. Erva believes in placing 'patients over profits' and is dedicated to continue to do the most important work for the betterment of society and to be the voice for those who are most vulnerable.

John Weiman, Cultivation Operations
58 Primrose Street
Indian Orchard, MA 1161

John Weiman is a resident of Springfield with an extensive background in the legal cultivation of recreational and medical cannabis. John's experience dates back to the infancy stage of the cannabis industry. John's experience is practical in that he was involved with indoor and outdoor cultivation. John was a registered grower and license holder from the Oregon Health Authority. Within the industry John is considered an expert and recognized as a Master Gardener/Grower. John's experience from Oregon expanded to include management, the identification and treatment for pest and disease. John's experience also includes industrial grow facility design and consultation to Retail Marijuana Establishments.

Location

23 Rindge State Road in Ashburnham, Massachusetts is an ideal location for a retail marijuana establishment. Located at the intersection of Mass. Rtes. 101 and 119, this high traffic location will service local residents along with travelers from all areas in Mass. Nearby Mt. Watatic State Reservation attracts tens of thousands of visitors per year as well.

Traffic

Routes 101 and 119 are designed to accommodate the increase in vehicle traffic that a retail establishment will bring.

Zoning

The site is zoned Commercial, and is in compliance with the zoning regulations for retail sale of cannabis, manufacturing, and cultivation, as set forth in Article 17, Sec. 5.20. et seq. It also complies with all buffer zone requirements as demonstrated below; there are no schools, or residences within 500 feet of the site, and Section 5.10 of the Ashburnham Zoning Bylaws.

Design & Construction

Eddie's Flowers, Inc. will be undertaking to remodel 5,000 square feet of the building interior, which is anticipated to cost \$300,000.00. The intent is to construct a retail space containing display counter where each bud-tender will have all of the facility's products available. The anticipated construction will be folded into Eddie's Flowers, Inc.'s development of the entire space, which includes its retail space, and a separate Manufacturing facility on the second level.

Fiscal Impact

The proposed use of the building will not create an increase to the fiscal impact upon town of Ashburnham. Eddie's Flowers, Inc. does not anticipate any disruption during construction phase or ultimate operation.

This proposed use is substantially equal to the demand on municipal services required by the former, Country Store's use of the property. While the operation may cause a mild increase in traffic to the facility, the location and infrastructure are more than adequate to accommodate what is anticipated. There are adequate water and sewer services at the location. (see letter/report from Northeast Engineering attached hereto as Exhibit "E".)

Rather than viewing this as a potential negative impact, there would seem to be a significant fiscal advantage in that this would help preserve the real property tax base by having Eddie's Flowers, Inc. as a long-term presence at the property. This facility is completely self-contained (water and septic), thus will not have any impact environmentally.

Eddie's Flowers, Inc. intends on hiring an independent contractor to evaluate and recommend improvements to the safe and sanitary condition of its facility. Eddie's Flowers, Inc. will comply with all permitting and sanitary requirements pursuant to 105 CMR 590.

Public Health and Safety

Eddie's Flowers, Inc. will utilize state of the art security measures inside and outside of the establishment including proper lighting inside and outside of the establishment, as well as proper alarms and video surveillance. The security team will physically monitor the premises 24/7 as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Lighting

Eddie's Flowers, Inc. will install photo cell controlled, directed diode LED pole lamp heads outside of the registered premises that adequately illuminate the facility and its immediate surrounding areas, including the parking and entry areas. In addition to the pole lamps, LED wall pack lighting will be installed on the exterior where needed. All lighting will meet the lighting requirement of the video surveillance devices, allowing for the identification of people, vehicles and license plates. The directed diodes are designed to deflect away from adjacent residential properties.

Exterior wall packs and interior lighting (including exit and emergency lighting) will be served by a backup generator in the event of a power outage.

Cameras

Eddie's Flowers, Inc. will employ a video surveillance system, combining high resolution megapixel Pan, Tilt and Zoom (PTZ) and still cameras, covering all points of entry, as well as the retail, storage, manufacturing and cultivation areas of the facility. This system will have the capability to record, archive and playback video feed for a minimum of ninety (90) days. The system will provide flexibility and multiple streams for efficient operations and prompt investigations. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities. Electronic locks, requiring keypad access codes, will be used to secure the security viewing area. A current list of authorized employees and service personnel that have access to the surveillance room will be available to law enforcement upon request.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Security Staff

Eddie's Flowers, Inc. will employ adequate security personnel with a focus on hiring officers with a history of military and law enforcement service. They will be equipped with the latest in communication devices and equipment. Eddie's Flowers, Inc. will provide training that also focuses on compassionate de-escalation techniques.

Security Plan

500.110: Security Requirements for Marijuana Establishments

Premises Security

Security measures in compliance with 935 CMR 500.110:

Eddie's Flowers, Inc. utilizes state of the art security measures inside and outside of the establishment. As demonstrated in the written plans for security at Eddie's Flowers, Inc., proper lighting will be installed outside of the establishment, as well as proper alarms and video surveillance. Eddie's Flowers, Inc. Security Team will physically monitor the premises as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Eddie's Flowers, Inc. will limit access to all areas of the establishment where marijuana will be cultivated, processed and stored to authorized agents. Eddie's Flowers, Inc. will

control access to secure areas through the use of access control devices, including biometric locks (thumbprint access), which will ensure that access is limited to only authorized personnel.

In addition, all staff will be required to visibly wear their provided establishment agent registration card at all times while on-site and when making deliveries.

For added security, visitor access will be strictly controlled. All outside vendors, contractors, and visitors must obtain and wear a visitor identification badge prior to entering any limited access area. All visitors will be escorted by a security associate escort at all times inside the enclosed, locked facility where marijuana is stored and/or cultivated. All visitors must be logged in and out, and that log will be available for inspection by the Commission at all times. All visitor identification badges must be returned to the escort upon exit.

The outside of the premises will be well lit, and will have video (as described below in “Security Procedures”) and patrolling security personnel, outside the premises 24 hours per day.

Diversion Protection/Employee Theft

There shall be access areas accessible only to specifically authorized personnel. Access to secure areas will be controlled through the use of access control devices, including biometrics or access card locks, which will effectively limit access to only authorized personnel. MAC will post the following statement (at a minimum size of 12” x 12” with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify.

Limited-access areas: “Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only.”

Eddie’s Flowers, Inc. shall provide all establishment agents with varying levels of access to limited access areas depending on their position. For example, the officers will have access to all areas of the establishment facility, including all limited access areas. Associate level positions, on the other hand, will be limited to only those areas directly related to their department and position within their department.

All finished marijuana product shall be stored in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie’s Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will convert the storage space into a walk-in safe (“vault”). We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash

and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. Eddie's Flowers, Inc. employees and management shall keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. All equipment shall be kept in good working order.

The company shall use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel. All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

CMR 500.110

○ Positively identifying individuals seeking access to the premises of the Marijuana Establishment or to whom or marijuana products are being transported pursuant to 935 CMR 500.105(14) to limit access solely to individuals 21 years of age or older;

• As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises.

○ Adopting procedures to prevent loitering and ensure that only individuals engaging in activity expressly or by necessary implication permitted by these regulations and its enabling statute are allowed to remain on the premises;

• Prior to entering the establishment, all customers must present valid government identification for visual inspection by a member of our Security team, ensuring the customer is 21 or over. These forms of identification include:

- A valid, unexpired government-issued photo ID card with name, photograph, and date of birth, which matches the information on the Registration Card. This will be limited to one Passport

Once identification has been verified, by a member of our Security team, customers will enter the building through a secure vestibule area; this double-door system will serve as an additional measure to control access to the building. Once a customer's identity has been verified, only then will they have been granted access to the building.

of the following:

- Driver's License
- Government-issued ID card
- Military ID card

Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc.'s agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain operational during a power outage.

Our comprehensive security plan has been designed to monitor and protect all areas where a compromise to the safety and All medicinal marijuana and Marijuana Infused Products (MIPS) will be stored in Limited Access Areas (LAA) in a secure, locked safe or vault to prevent diversion, theft, and loss. Any marijuana waste generated at the clinic will be stored in a dedicated, secure compartment within the facility, and will be transported back to MAC's cultivation facility for proper, secure disposal in accordance with CCC regulations.

The outside perimeter of the premises will be sufficiently lit to allow for surveillance, and foliage will be removed so as not to allow persons to conceal themselves from sight. Perimeter alarms will be placed on all entry points, and perimeter windows will have duress, panic, and holdup alarms that are connected to local law enforcement systems. The Establishment will have a redundancy alarm system that will ensure an active alarm in the event the primary alarm is compromised and a failure notification system will notify management and local law enforcement in the event of a surveillance system failure within five minutes.

Video cameras will be used in all areas that contain marijuana, all entrances and exits, and in the parking lot. Our surveillance security of the building might occur.

Particular emphasis has been placed on customer and staff safety, safeguarding storage, handling and distribution of marijuana. In addition, comprehensive operational policies and procedures have been detailed in the Security Department's

Operations Manual.

Eddie's Flowers, Inc. has contracted with a qualified Massachusetts security contractor, Beacon Protection, which specializes in developing thorough security systems to develop and install a superior security system. Eddie's Flowers, Inc. will also use internal loss prevention methods, standard retail cash handling procedures, and track daily reimbursements and expenses. The security policies and procedures implemented at Eddie's Flowers, Inc. have been proven successful in safeguarding marijuana establishments.

Exceeding the security requirements of Massachusetts law, Eddie's Flowers, Inc. will utilize a comprehensive security system designed to monitor and protect all potential areas of Eddie's Flowers, Inc.. The principal concept of securing the facility focuses on the following three areas:

- Safeguarding the storage of marijuana.
- Providing a safe and secure environment for Eddie's Flowers, Inc. staff, and visitors.
- Developing comprehensive audit procedures for the entire operation as related to the handling and distribution of the product.

The security system at Eddie's Flowers, Inc. features four (4) elements that will work together to ensure maximum protection of the facility. These features are described below and include:

- Access Control System
- Intrusion Detection
- Lighting
- Video Surveillance System

Access Control

As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises. Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc. agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain

operational during a power outage.

Eddie's Flowers, Inc. will feature an alarm system on all entry points and windows. Motion detectors shall also be placed in all interior portions of the establishment.

Eddie's Flowers, Inc. will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

The establishment shall keep all safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel.

We will install a 'duress alarm' (silent alarm to signal alarm user being forced to turn off system), a 'holdup alarm' (robbery in progress), and a 'panic alarm' (life threatening or emergency situation). Alarms will be placed throughout the establishment at strategic locations coordinated with local public officials.

We will post the following statement (at a minimum size of 12" x 12" with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify limited-access areas: "Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only."

Eddie's Flowers, Inc. has included a floor plan of our facility with this application, to demonstrate the design scheme and security features to be used at Eddie's Flowers, Inc..

We will limit access to all areas of the establishment facility where marijuana will be processed and stored to authorized establishment agents. All outside vendors, contractors, and visitors must obtain a visitor identification badge prior to entering a limited access area; the visitor identification badge must be visibly displayed at all times while the visitor is in any limited access area. All visitors must be logged in and out, and that log shall be available for inspection by the Department at all times. All visitor identification badges shall be returned upon exit. For added security, we will require that Security accompany any non- establishment agent if a non-establishment agent needs to enter the enclosed, locked facility where marijuana is stored and/or cultivated.

Eddie's Flowers, Inc. will use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel. All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Trees, bushes and other foliage outside of the Marijuana Establishment shall be maintained so as to prevent a person or persons from concealing themselves from sight.

Intrusion Detection

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana, including the storage safe.

Lighting

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana including the storage safe

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

Electronic Surveillance System

The security system must thwart threats at all times, especially outside of store hours where no one will be present. The intrusion detection system must include an alarm system that detects unauthorized access or attempts (including tampering) of all secured entry points, our customer door and cannabis storage room. In case of a break-in or attempted break-in, we will have our intrusion detection system immediately repaired.

We will also install intrusion detection system with a law-enforcement response system. This includes a panic/help-button at the point-of-sale area for employees in case of a robbery or another threat. However, its best practice to ensure our alarm also triggers a response from the police, which will be our first-respondents during nighttime break-ins.

Eddie's Flowers, Inc. will maintain all security system equipment and recordings in a secure location so as to prevent theft, loss, destruction, and alterations. This will be a limited access area featuring electronic locks that allow restricted access to select authorized establishment agents, such as the Security Manager and CEO, as well as law enforcement authorities and the Department.

Eddie's Flowers, Inc. will have a back-up alarm system, with all capabilities of the primary system (this shall not be the same company as the primary security system).

The electronic monitoring system for Eddie's Flowers, Inc. includes a failure notification system that provides both an audio and visual notification should a failure in the electronic monitoring system occur. Additionally, senior management will receive email/text notification of the system failure within five minutes after the failure.

Eddie's Flowers, Inc.'s video surveillance system will have the capability to record, archive and playback video feed for a minimum of 30 days. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities and the Department. A current list of authorized employees and service personnel that have access to the surveillance room will be available to the Department upon request. Electronic locks will be used to secure the security viewing area, access will only be granted to authorized establishment agents.

Our video recording will be operational 24 hours a day/7 days a week. Videos will be retained for a minimum of 90 days or unless requested longer by appropriate authority.

Eddie's Flowers, Inc. will embed a date and time stamp on all recordings. The date and time will be synchronized and set correctly and will not significantly obscure the picture.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Eddie's Flowers, Inc.'s surveillance system will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. All recordings will be erased or destroyed prior to disposal.

We will maintain a high-quality printer in the security viewing area that is capable of immediately producing a clear still photo from any video camera image.

Eddie's Flowers, Inc. will go to great lengths to protect the confidentiality of our security measures, such as combination numbers, passwords, and electronic lock activators, against threats from unauthorized personnel.

Public Safety Concerns

Contrary to initial concerns, the establishment of a marijuana facility has been shown to actually deter crime in the surrounding community due to the significant investment in security personnel and infrastructure. Several studies have concluded that marijuana facilities do not lead to increased crime in their communities:

- In late 2010, the Denver Police Department analyzed crime rates in areas in and around dispensaries. The Department found that crime was down 8.2% in 2010 when compared with the same period in 2009, and as compared to an 8.8% drop in crime for the city overall.
- In a June 2011 Regent University study, researcher Maura Scherrer found that most crimes, including robbery, vandalism, and disorderly conduct increased in Denver from 2008 to 2009. However, in areas within 1,000 feet of a establishment, rates were down for most types of crime (including a 27.5% reduction in disorderly conduct citations). She concluded, “it appears that crime around the marijuana centers is considerably lower than citywide crime rates; a much different depiction than originally perceived.”
- A March 2014 study by researchers at the Program in Criminology at the University of Texas at Dallas analyzed the FBI’s Uniform Crime Report Data for states across the country between 1990 and 2006 and found that marijuana laws were not proven to have a crime exacerbating effect on any of the seven crime types they analyzed (homicide, forcible rape, robbery, aggravated assault, burglary, larceny, and auto theft). Additionally, they found that marijuana laws preceded reductions in homicide and assault.

The establishment of Eddie’s Flowers, Inc.’s Adult Use Marijuana Establishment will encourage visitors to the neighborhood, while the benefits of an increased security presence around the facility will have a significant positive impact on the entire neighborhood. Eddie’s Flowers, Inc. has a multi-tiered and sophisticated security system, with layers of surveillance cameras used both inside and outside the premises, and security guards employed to ensure safety. Eddie’s Flowers, Inc. presence will serve as a general deterrent to criminal activity and other problems on the street, thereby ensuring a safe environment not only for establishment members and staff but also for neighbors and businesses in the surrounding areas.

Abuse/Diversion Prevention Plan

Marijuana Possession and/or Use on Town Property

Eddie's Flowers, Inc. will not allow any burning or consumption of any product containing marijuana or marijuana related products on the premises.

Eddie's Flowers, Inc. will ensure that our customers and employees are educated on the prohibitions surrounding marijuana possession and/or use on city property. All marijuana dispensing operations at Eddie's Flowers, Inc. will take place on private property located within the required zoning district.

Eddie's Flowers, Inc. will display signage, including the following language for restricted access areas.

"Do Not Enter—Limited Access Area—Access Limited to Authorized Personnel Only" in lettering no smaller than one inch in height.

Good Neighbor Policy

"As a member of this community, we ask that you be especially mindful of our neighbors. We have worked hard to establish a positive relationship with our neighbors, the town, and the police department. Please be respectful of our neighbors' rights, privacy and property.

"We encourage you to help us keep our commitments to our neighbors by not creating a nuisance or lingering in the parking lot or sidewalk areas. Always be careful and courteous when entering or exiting the parking lot. These simple precautions will keep neighbor relationships in good standing and help prevent any legal interference with our operations. With your support, we plan to be here to serve you for years to come."

Public Health Consequences

Eddie's Flowers, Inc. is committed to instituting measures in an effort to prevent drugged driving and other adverse public health consequences associated with marijuana use. Eddie's Flowers, Inc. will educate all customers on the use of marijuana. This is especially important if it is the first time the customer is using marijuana, or if the patient is using a different format for ingesting the medicine. Eddie's Flowers, Inc. consultants will provide customers with a comprehensive understanding of our rules, special discount programs and library resources; various methods of cannabis administration and/or ingestion options, and related side effects; safety, effectiveness and techniques relating to edibles and drinks, and the safe consumption of cannabis; information comparing and contrasting Indica vis-à-vis Sativa; and recent scientific literature on clinical applications and health effects of marijuana.

While not every customer will want to ask questions, or discuss his or her medical condition, every customer will be encouraged to ask any questions of Eddie's Flowers, Inc. consultants.

Eddie's Flowers, Inc. believes that our best marketing efforts, and our best product, is the expertise and knowledge of our dispensing staff who can pass along to our patients their knowledge of the effects of different strains, various forms of ingestion, and the use of topical products. This one-on-one personalized service will enable our customers to choose the best and most effective cannabis for their individual needs.

All of the alternative dosage forms are laboratory tested for cannabinoid content, strength and consistency. They are provided to patients in sealed, tamper-proof packaging, and labeled with the name of product, nutritional information, cannabinoid content and other applicable information (i.e. strain, batch, quantity, etc., as appropriate), to be in compliance with the laws, rules and regulations of the Commonwealth of Massachusetts.

While always exceeding the state's specific standards for product labeling, additional labeling on all medical-cannabis products will include:

- "For Medicinal Use Only, Not For Resale;"
- "Keep Away From Children;"
- "WARNING: Marijuana use can impair an individual's ability to drive a motor vehicle or operate heavy machinery. Marijuana smoke contains carcinogens and can lead to an increased risk for cancer, tachycardia, hypertension, heart attack, and lung infection."

In terms of the public health impact of marijuana, various studies have indicated that the use of marijuana for medical purposes does not pose an immediate threat to public health. In addition, marijuana has been reported as an effective tool in treating opiate addiction. A 2013 study out of Wayne State University Medical School found that

marijuana patients consistently reported using marijuana to substitute or wean off prescription narcotic drugs. All interviewed patients and producers reported having reduced their overall drug use, especially the use of opiates, by using marijuana. A 2012 Canadian study found that among marijuana patients from four dispensaries in British Columbia, 75.5% of respondents cited using cannabis as a substitute for another substance (41% reported using cannabis as a substitute for alcohol, 36.1% use cannabis as a substitute for illicit substances, and 67.8% use cannabis as a substitute for prescription drugs).

Preventing Violence, Diversion, and Illegal Activity (Including Trafficking)

In order to ensure our facility has adequate security coverage, we will employ onsite security guards 24 Hours per day, and employ routine patrols outside the Mall in the parking areas.

All security personnel will be required to complete an intensive department training and formal skills evaluation as a condition of employment. Training will include the proper use of security measures and controls that have been adopted by the establishment for the prevention of diversion, theft, or loss of marijuana; procedures and instructions for responding to an emergency; state and federal statutes and regulations regarding confidentiality of information related to medical use of marijuana. All security personnel will also be required to complete an annual orientation and training seminar.

In addition, we have developed comprehensive security policies and procedures for employees regarding threats and acts of violence, and reporting security-related incidents such as theft, loss, vandalism, malicious or unauthorized use of company equipment or facilities, and allegations of employee misconduct. The Security Manager is responsible for ensuring this training occurs and for periodically quizzing establishment agents to ensure the knowledge is retained.

We have gone to great lengths to ensure our written policies are comprehensive, practical and suited for the industry. To achieve this, we've worked with leading experts to develop the comprehensive operational guides. All employees, including security personnel, will receive a copy of our Safety Handbook during Orientation Training. The Safety Handbook includes procedures for natural disasters (fire, earthquake, etc.), robbery, biological threats, evacuation plans, as well as safety and security prevention measures to ensure the safest environment possible and the ongoing well-being of members, staff, and the surrounding area.

We will also employ security guards during non-business hours along with our advanced security surveillance and alarm system, which will provide more than sufficient protection of our Establishment and the critical assets stored inside.

We will provide the Police Department, Fire Department, Building Commissioner, Board of Health, and Special Permit Granting Authority with the names, phone numbers and email addresses of all management staff and key holders whom one can provide notice if there are operating problems associated with the facility.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems. At least one security guard will be on duty anytime facility staff are in the facility.

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility.

During the day-to-day operations and security manager supervisor will oversee these functions.

In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security staff and performing the duties
- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design
- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and
- Using recognized best security practices, adhere all security related rules as described in the regulations.

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry (Not armed during duty at this time unless determined necessary due to

threat)

-

Staffing

The Retail, Cultivation, and Manufacturing facilities will be staffed by security officers 24/7. This includes weekends holidays and evenings.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors
- Maintain the Security of the various interior sections of each facility, and ensure the security of the exterior areas through video surveillance and personal patrols.

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities
- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individuals shift and completed

with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple issues.
- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Firearms and Weapons

Eddie's Flowers, Inc. will prohibit the presence of firearms and weaponry on all properties. This will be reiterated to our employees and patients during orientation as well as through our handbooks and Code of Conduct. Violations of this policy will result in immediate dismissal of the patient and/or employee.

Eddie's Flowers, Inc. does not intend to utilize armed guards for securing our RMD. Based on industry best practices and the professional experience of our industry advisors, we feel that the use of armed guards in our operations present several significant issues:

- The presence of an armed guard hasn't actually been shown to increase security;
- The range of security measures in our plan (including comprehensive intrusion detection, camera coverage, and limited access areas) work together to go above and beyond in terms of providing a very secure facility;
- The presence of armed guards disturbs the aesthetic of facilities designed to ensure a welcoming and inviting environment for patients; and
- The use of firearms causes tremendous legal issues at the State and Federal level, if a guard were to have to use force within the facility. Protections for the guard's behavior on-site do not exist, and the legal consequences for the use of a firearm in the presence of a controlled substance are unclear.

For these reasons, we will be firearm and weapon free.

Diversion

Eddie's Flowers, Inc.'s POS System, METRC, will be able to monitor inventory at all times. In addition proper training and constant video surveillance will prevent diversion.

Incident Reporting

We will utilize incident logs (referred to as Incident Reports) to document the occurrence of specific events. Security incidents should be reported in order to provide information to Management for decision-making, recovering lost or stolen property, obtaining restitution for losses, and aiding in the formulation of risk-reduction practices, policies and procedures. Each security Incident Report must be classified using one of the following:

- Any Security incident/law violation which may result in the dismissal or prosecution of employee(s)
- Alarm/False - Fire
- Alarm/False - Security
- Arrests by law enforcement

- Assault, attack, molestation or threats of/to employees while on company property or in the performance of their work
- Break & Enter - Building
- Burglary or attempted burglary of the building(s)
- Confrontations between staff and others
- Damaged Property - malicious or extensive
- Disturbance - Employee/Visitor/Contractor/Visitors
- Drug Abuse
- Fire
- Found Property
- Incidents which have a potential for receiving media coverage
- Injuries to staff, contractors, visitors, clients
- Incidents involving homicide, weapons, hostages, sabotage, explosions or hazardous chemicals
- Lost or stolen product [MUST BE REPORTED TO LOCAL LAW ENFORCEMENT. SEE SECTION BELOW ON REPORTING TO LAW ENFORCEMENT OFFICIALS.]
- Missing Property - Facility/Personal
- Misuse of company information and data processing where financial gain or damage to Eddie's Flowers, Inc. is involved
- Reports of substance abuse or sale of narcotics on property
- Robbery - Armed/Unarmed, or attempted robbery committed on Eddie's Flowers, Inc. property, or of a Eddie's Flowers, Inc. employee in the course of company business, regardless of whether anything was taken
- Sexual Incident - Harassment/Assault/Obscene Call/Other
- Suspicious Person - Contacted
- Suspicious Person - No Contact
- Suspicious Circumstances - General
- Theft or vandalism of property by an employee
- Theft or loss of credit cards
- Theft, forgery or alteration of checks

- Theft, unauthorized disclosure, loss, malicious destruction of proprietary information, or physical assets classified as sensitive, high-risk or confidential to include espionage, eavesdropping or other improper means of obtaining same
- Threat - Bomb
- Threat - Other, received by staff, visitors or contractors
- Trespass
- Vandalism - Facility/Personal/Vehicle
- Violation of any other law on company premises

In general, all thefts, damage, or loss over \$500 should be reported immediately. All security incidents listed above should be reported to the General Manager. Follow-up reports should be submitted concerning any significant developments relating to the incident. All incidents must be formally closed.

Reporting to Local Law Enforcement

In a non-emergency incident or when life/safety is not a concern, security personnel are required to work with the General Manager prior to reporting a relevant security incident to the police.

Any incident involving lost or stolen product must be reported to the Department and to local law enforcement via a police report. All reports must be made within 12 hours of becoming aware of the theft or loss.

To notify authorities, staff will do one of the following:

- Call 911.
- File in-person with the Police Department.
- Submit a written report to the Police Department.

We will investigate all work-related accidents in a timely manner. The Security Manager is responsible for accident investigation, and other management personnel will be involved as needed.

All incidents are documented on individual Incident Reports, but they are also tracked by type, location, and number of incidents on a monthly Incident Summary.

There is one Incident Summary “By Type,” and one “By Location.” Incident Summaries are completed at each month’s end and submitted to the General Manager, along with a copy of all Incident Reports for that month. All Incident Reports shall be maintained indefinitely by the Security Department.

We will notify appropriate law enforcement authorities and the Commission of any breach of security immediately and, in no instance, more than 24 hours following discovery of the breach. Notification shall occur, but not be limited to, during the following occasions:

10. discovery of discrepancies identified during inventory;
11. diversion, theft or loss of any marijuana product;
12. any criminal action involving or occurring on or in the Marijuana Establishment premises;
13. any suspicious act involving the sale, cultivation, distribution, processing or production of marijuana by any person;
14. unauthorized destruction of marijuana;
15. any loss or unauthorized alteration of records related to marijuana;
16. an alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the Marijuana Establishment;
17. the failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours; or
18. any other breach of security.

Eddie's Flowers, Inc. shall, within ten calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110(7)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified.

All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(7)(a) shall be maintained by a Marijuana Establishment for not less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities upon request.

Security Audits

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

Revenue

Eddie's Flowers, Inc. will implement policies and procedures to effectively prevent revenue from the sale of marijuana from supporting criminal enterprises, gangs, and cartels. Our chief financial officer will be responsible for managing all financial tasks for our organization including financial accounting and reporting, payroll preparation and administration, budget preparation, project management accounting, and risk management.

The METRC system is designed to collect data associated with business management including assets, liabilities, monetary transactions, and the like. METRC keeps a real-time record of all processes within the Establishment. Detailed, refined reports may easily be configured to produce the information required by management or upon inspection by state and local regulators. METRC features password protection and unique codes that will be used as electronic signatures. Records will be kept of all logins and records created or edited during that login time.

Our Operations and Management Practices Plan calls for the organized and secure retention of all business records including: assets and liabilities; monetary transactions; written or electronic accounts that include bank statements, journals, ledgers and supporting documents, agreements, checks, invoices and vouchers; and any other financial accounts reasonably related to the Establishment operations. Management will make frequent sweeps of cash drawers and place cash in the vault along with randomly scheduled cash pickups to deliver cash from the facility to our bank via armored car service.

Emergency Procedures

The establishment shall keep a First Aid kit on the premises at all times

All Agents shall be trained in basic First Aid, including CPR.

In the event of fire, the Vault and other areas shall be cleared, and staff shall escort customers out of the nearest exit, with each employee having specific duties to ensure the orderly evacuation of customers and staff.

A detailed evacuation route shall be posted, and included in the establishment's training manuals. One employee/agent shall be assigned the duty of conducting a head count upon evacuation of the premises.

In addition to any automatic alarms, the appropriate authorities shall be notified of the event, only after the premises are safely evacuated.

Management and Business Operations

Management Plan

Eddie's Flowers, Inc. is a corporation organized under the laws of the Commonwealth of Massachusetts. Eddie's Flowers, Inc. is submitting the following as **Exhibit "A"**:

3. Articles of Organization (attached with Bylaws) others to follow,

newly formed corporation.

Eddie's Flowers, Inc. anticipates receiving a timely and favorable response from the Town of Ashburnham. Eddie's Flowers, Inc. is prepared to submit its application for a Community Host Agreement/Special Permit. Upon approval from the Cannabis Control Commission it is anticipated that the initial build out will be completed within four (4) months.

Eddie's Flowers, Inc. is obtaining a quote to satisfy its insurance requirements outlined within 935 CMR 500.105(10).

Eddie's Flowers, Inc.'s state of the art 2500 square foot facility located at 23 Rindge State Road, will provide expert consultation, providing various forms of high quality cannabis in a safe, secure, welcoming environment. The project, if approved, would initially create at least 22 full time and up to 4 part-time jobs, including at least 8 in the Manufacturing process.

We are committed to providing a better quality of life for our customers, through alternative health resources in a professional and compassionate environment, while improving the community through charitable events and services. Aided by education, mutual respect and positive encouragement, "Eddie's Flowers, Inc.", will ensure that customers who enter our center will experience a feeling of security, belonging and well-being.

We will adhere to strict policies and procedures that ensure compliance and transparency in our operations, as well as safety for customers, employees, and community. We will provide only the safest, highest-quality products, featuring rigorous processing, testing, and secure and professional packaging. Our staff will be well trained in applying our care philosophy and we will strive to meet our customers' needs with respect and compassion. We will add value to our community through acts of service, educational offerings, charitable donations, active civic participation and providing free and reduce cost medicine to veterans.

Our unique mix of experience and commitment will enable "Eddie's Flowers, Inc." to be a constant and consistent provider in meeting the needs of the patient community and improving the quality of life for these patients and those around them.

Service Area

The recreational marijuana industry is still in its infancy and is relatively undeveloped compared to most industries. The market is characterized by local culture, with entities taking form based on the social climate of the communities in which they are located.

Community Safety

The building and surrounding areas will be monitored at all times to prevent loitering and any other potential disturbances to the quiet enjoyment of the neighbors and surrounding businesses. Our operating plan carefully considers traffic management; we will always work diligently to ensure we minimize traffic congestion in the area.

We do not expect that we will experience any undue threats to the security of our facility, our product, our employees, or our prospective patrons. In fact, speculation that marijuana establishments lead to increased crime rates has been largely discredited by empirical and statistical analyses by research and law enforcement agencies.

We anticipate, given our commitment to being model community members and our world-class operating standards, our marijuana establishment will contribute positively to the safety and security of the area surrounding our facility.

In keeping with our commitment to community, we will implement “responsible neighbor” trainings for our staff emphasizing sensitivity to the concerns of neighbors, and will require our staff and patients to adhere to a code of neighborhood conduct. Violation of our good neighbor policies can result in discipline, up to and including termination of employment for a staff member or termination of a patient’s establishment access.

We will continue to work with community stakeholders, public safety agencies, health care professionals and city officials to ensure that the community is confident that we will be a responsible marijuana operator who can add social value and serve as a good neighbor.

Staffing plan and staffing records in compliance with 935 CMR 500.105(9);

Employees

Our manufacturing facility's employees will consist of one Extraction Supervisor, one Extraction Assistant, one Edible Supervisor and two Edible Assistants

The Extraction Supervisor - oversees all operations in the manufacturing lab to ensure total compliance with all regulations and procedures set forth by the state of Massachusetts and METRC tracking system. Trained in operation of all Extraction equipment in the lab they the manufacturers specifications, the Supervisor will also maintain up to date knowledge on any and all Extraction methods in the industry. Oversees Extraction Assistant in machine operation, METRC tracking, and compliance with any and all state regulations. Works with Quality Control Supervisor to make sure no biomass is contaminated with mold or mildew. Also chooses all state approved packaging for concentrates packages in facility according to company policy and standards of the state.

Extraction Assistant- Assists Supervisor in Extraction Supervisor in operating Extraction equipment and METRC tracking, as well as making sure lab is in compliance with state regulations at all time. Maintains organized sterile laboratory environment in the Extraction lab. Helps Cure/Dry team properly package concentrates before labeling.

Kitchen Supervisor

Oversees edible kitchen and all equipment, products, and all procedures to ensure superior product and total compliance with state regulations and METRC tracking. Designs all cannabis edible products to be produced in kitchen in compliance with sanitation requirements stated in CMR 500.000: "Good Manufacturing Practices for Food, Diseases, Surveillance and Quarantine Requirements" Ensures that no edibles are shaped in any form prohibited by 935 CMR 500.150(1) Also makes sure all edibles produced are packaged in compliance with M.G.L.c 94G, § 4(a1/2)(xxvi) and 935 CMR 500.105(5) and (6). Also ensures compliance with labeling, dosing, and sanitary regulations.

Kitchen Assistants:

Assists Kitchen Manager in ensuring compliance with state regulations and METRC, as well as maintaining a sterile environment in the Kitchen. Works in coordination with DRY/Cure Team to package all products produced in kitchen.

Operations profile: Cannabis trim in our vaults is moved, after cataloging the move into METRC, and brought into the Extraction facility. biomass of cannabis or cbd that may be transferred from any other facility in compliance with state regulations on transfer, testing, and METRC in compliance with 935 CMR 500.105(13), and 935 CMR 50.160.

Once entered into METRC, batches are run loaded into Extraction machines according to manufacturers specifications. Different industry leading extraction machines (distillation, and hydrocarbon extraction) process material into Raw concentrates. Raw concentrates are then refined with vacuum purging in an oven at certain temperature that pulls out remaining

hydrocarbon, a distillation machine and rotary evaporator that separates different cannabinoids and terpenes from any contaminants. Now terpenes and cannabinoids are recombined to specifications determined by Extraction Supervisor for optimum effect and flavor.

Once processed, used biomass is weighed and data entered into METRC before being sent to waste room to be stored before disposal according to state regulations. Concentrates extracted by individual machines will be weighed out with data entered into METRC, to then go out for testing following state approved transfer procedures to a state regulated testing facility. Once tested, the product is returned to the facility to be packaged by our Dry/Cure team, entered into METRC, and stored before going out to retail or wholesale, or moving over to the Manufacturing department. kitchen.

Extracts transferred into the kitchen are entered into metric, and added according to state requirements to different products designed by the Kitchen Supervisor per regulations set by the state on dosing, shape, sanitary requirements. Once products are produced they are again recorded into METRC and sent to the packaging room to be packaged by the Dry/Cure team in coordination with the Kitchen Assistants to ensure compliance.

Security Associate – Works as a member of the security team to implement security policies and procedures to protect the property, confidentiality and assets from theft, damage or acts of vandalism; acts as a visible resource for the responsible and secure operation of the facility, interacting with customers and staff in a positive manner, while maintaining compliance with establishment rules of conduct and state laws and regulations.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems.

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility. During the day-to-day operations and security manager supervisor will oversee these functions. In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security staff and performing the duties
- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design

- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and
- Using recognized best security practices, adhere all security related rules as described in the regulations

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry

Staffing

The facility will be staffed by security officer with the dispensaries open. This includes weekends holidays and evenings.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific

training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities
- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individuals shift and completed with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple issues.
- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident

- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Eddie's Flowers, Inc. will also coordinate its security efforts with local law enforcement.

Manufacturing CBD and THC Products

Step I

(Flower is trimmed and ground to a fine dust)



Step II (Extraction)

The ground flower is then loaded into a Super Critical CO₂ Extraction machine. Which uses high pressure and low temperature to keep the product pure.

Each vessel is set at a different pressure, which allows various compounds to be extracted including cannabinoids and terpenoids, allowing maximum extraction of all useful substances. CO₂ Extraction is the safest way to Extract Flower, unlike methods using Butane, which are generally illegal due to combustion issues, and the Butane also contributes to an impure product.



Step III (Sonication)

The extracted “resin” is then loaded into a Sonicator, at which point the resin is “agitated” to further facilitate separation of the impurities. Alcohol has been added to facilitate same.



Step IV (Winterization)

The extracted resin is then “Winterized” where it is exposed to sub-zero temperatures to further separate the waxes and chlorophyll.



Step V (Filtration)

The resin is then filtered to remove the waxes and Chlorophyll. What results is beautiful amber oil, which just needs the Ethanol removed.



Step VI (Ethanol Removal)

The Ethanol is removed through a vacuum process, which allows the Ethanol to be reclaimed and re-used.



Step VII (Decarboxylation)

This final step removes a carboxyl group and releases Carbon Dioxide, allowing the human body to absorb the active substances such as THC and CBD.



The finished product can be used as is in by mixing with various oils such as MCT (Coconut Oil, Olive Oil, etc.), or can be mixed into other food products such as “gummies”.

Delivery Plan

Marijuana infused products are delivered in “ready for sale” packaging. All product deliveries will take place at varied times to deter predictability. Product delivery days will be randomly scheduled on a “just in time” basis to minimize product requiring storage on site. The vehicle will enter our secure, loading area in the rear of the facility. All deliveries are made in our secure Sally Port, and completed under the watchful eye of our video surveillance system and Security Associate.

Inventory Control

Eddie’s Flowers, Inc. has developed detailed Inventory policies and procedures based on best practices in the recreational marijuana industry.

Bulk packaged, inventoried marijuana flowers and preparations, will be stored in a vault within the Inventory department equipped with adequate lighting, ventilation, and temperature and humidity controls.

In addition to being guarded by biometrics locks, keypad access codes, and digital inventory logs, the vault will be monitored 24/7 by remote access camera monitors and by our security services provider and digitally recorded and indexed for review.

Marijuana and marijuana products in the vault will not be removed until needed for transfer or sale. Any marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or for which the containers or packaging have been opened or breached, will be stored in a separate, locked and enclosed “Destroy Box” within the vault until destruction.

Seed-to-Sale Tracking

For inventory management, among other things, Eddie’s Flowers, Inc. plans to utilize METRC. METRC is a fully integrated Point of Sale (POS), Inventory Control, Growhouse Tracking, and Patient/Customer Management system and is one of the only complete seed-to-sale systems available on the market today. This software has been specifically designed to serve registered marijuana dispensaries and is used in the recreational field as well.

From an inventory control perspective, METRC supports ordering, receiving, storing, sales, adjustments, labeling, disposal of unusable medicine, and audits. METRC fully supports the recording and tracking of the daily beginning inventory, daily ending inventory, acquisitions, harvests, sales, disbursements, and disposal of unusable marijuana. Records are retained indefinitely. It is a true seed-to-sale POS solution.

Robust inventory reports in the POS system show current inventory levels. Each product has a unique transaction history that shows every sale and addition/removal from inventory, as well as a date/time stamp and the user ID of the establishment agent who executed the transaction.

The General Manager will conduct and document an audit of the establishment's inventory, using generally accepted accounting principles, at least once every 30-calendar days. At a minimum, per regulations, documentation will include the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory. (Our inventory counts will reflect a great deal more information.)

Should any material reduction in the amount of marijuana in the establishment's inventory occur, Eddie's Flowers, Inc. will determine where the loss has occurred and take and document corrective action. All losses and/or disappearances must be reported to the Security Manager to determine whether an Incident Report is required.

In addition to a Monthly Inventory Count, the General Manager conducts a Vault Count once a week. The Vault Count is a physical count of all inventory contained in the vault and helps maintain stricter controls and resolve potential problems more quickly.

Our staff will also perform a physical inventory count of all product on the inventory shelf reconciled by the General Manager with the Inventory Shelf Report. The Inventory Shelf Report is a custom POS report that takes the stocked amount – total amount moved from location A (the vault) to location B (the inventory shelf at the service counter) – and subtracts sales. (The Inventory Shelf Report does not include medicine in the vault, as that will be physically counted once a week and compared to the Inventory Vault Report.)

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and

distribution policies and procedures, as required by 935 CMR 500.000 et seq.
Inventory records as required by

- Seed-to-sale tracking records for all marijuana and MIPs as required.
- Personnel records that include job descriptions, a personnel record for each agent that includes a copy of the agent application submitted to CCC, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all CORI reports obtained in accordance with 935 CMR 500.000 et seq.
- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information
- Waste disposal records as required by 935 CMR 500.000 et seq.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Employee Training

Eddie's Flowers, Inc. has a comprehensive training curriculum that instructs department managers how to train staff members, and ensure comprehension and performance levels by using a Final Performance Test for each employee. The Final Performance Tests are comprised of demonstrable and measurable skills and knowledge required to perform basic job functions as identified in job descriptions. All employees will be required to pass a Final Performance Test before being moved out of their probationary employment period.

The overall training curriculum is comprised of Leader's Guides, which provide scripts for teaching all of the policies and procedures contained in the Operations Manuals and Trainee Workbooks that serve as a resource for each new hire during his or her training period. The training tools reference our Operations Manuals and operational supplements so that all employees are consistently and properly trained. These training references to official operational content reinforce employees' understanding that all policies and procedures are found in the Operations Manuals

and operational supplements should they ever have questions.

The training curriculum also provides Quizzes and Daily Recaps to ensure the retention of detailed learning and performance objectives throughout the training process. All training is documented and filed in each employee's human resource file securely located in the GM's office.

All employees go through Orientation Training, Safety Training, and Medical Training, irrespective of department. Upon completion of those modules, employees then complete their respective departmental training programs that cover all of the policies, procedures, knowledge, and skills required to operate effectively and in full compliance within the respective departments.

Eddie's Flowers, Inc.'s Orientation training module will generally be conducted by the GM. The following is covered during Orientation:

- Welcoming of the new hire
- Completion of paperwork and administrative tasks such as assigning POS logins, email addresses, etc.
- Review of the Establishment Handbook
- Review of the Employee Handbook, detailed instruction, and quiz
- Review of the Safety Handbook
- Legal training, including all state and federal laws relating to marijuana and marijuana, legal obligations of licensed marijuana entities, rules and regulations of the establishment, sexual harassment (no tolerance), effective interaction with law enforcement personnel, and the rights and responsibilities of marijuana patients
- Tour of the facilities and introductions to fellow staff
- Injury & Illness Prevention Program

Safety training immediately follows Orientation Training and will be conducted by a member of the Security management team. In addition to its focus on safety, safety training will include acceptable currency identification and counterfeit detection, warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution techniques, and diversion detection techniques.

Medical Training will be conducted by Eddie's Flowers, Inc.'s Medical Director (William Cristo, Jr.) Medical Training may be conducted at any point in the employee's initial training period so long as it is completed before the employee's Final Performance Test.

Medical Training topics will include:

- Rights of and sensitivity toward disabled individuals
- How to identify and interact with a customer having a medical emergency
- Marijuana Risks & Benefits Training
- Cannabis Use Patterns and the Detection of Dependence
- How to effectively refuse marijuana to patients who appear impaired or abusing marijuana

**Only authorized establishment agents who have been trained on privacy and recordkeeping policy and procedures will have access to Eddie's Flowers, Inc.'s records.

In addition to associate level training, all management level employees including members of the Executive Management Team are required to successfully complete a week-long, 8-hour a day, intensive management training course conducted by industry experts and other seasoned professionals with expertise in areas of management (HR, legal, financial, medical, etc.).

At a minimum staff will receive 8 hours of ongoing training each year, but generally much more.

Substance Abuse and Misuse Counseling/Training

We recognize the need to provide a safe environment that helps customers avoid substance abuse and misuse. Our employee-members will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependence and withdrawal. In our workshops, clinics and materials, we will emphasize personal responsibility for individual behavior. We will also provide information about the differing strengths of marijuana strains and products, as well as the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, nonprescription drugs, and supplements. Finally, working with our managers, customer education about the potential abuse of marijuana will be integrated in all patient visits, materials and outreach.

Diversion and Unsafe Practices

Any marijuana establishment agent who has:

Diverted marijuana shall be reported to law enforcement officials and to the Commission; or
 Engaged in unsafe practices with regard to operation of the Marijuana Establishment, shall 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 shall be reported to the Commission. Said employee shall be subject to immediate dismissal for any of the above infractions.

Storage of Marijuana in Compliance with 935 CMR 500.105(11);

Eddie's Flowers, Inc. will store all finished marijuana product in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie's Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will construct steel vaults. We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. We will keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. We will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;

Eddie's Flowers, Inc. will offer proprietary strains offering particular benefits for specific ailments. There are too many particular strains available to mention individually. However, marijuana consists of two basic strains, Sativa and Indica, with most marijuana being comprised of various combinations of Indica and Sativa, or hybrids. Our products will be sold in flower form, and in various products using THC and CBD extracted from flower by Hydrocarbon, Distillate, and CO 2 Extraction.

Products and flowers with various combinations of THC and CBD are used to treat various conditions. We will provide a variety of products depending on a customer's needs and will even custom manufacture product to a customer's specifications.

Cancer

The traditional treatment of cancer has consisted of chemotherapy and radiation, which basically prolongs life by slowing down the progress of cancers, but does not control the progress.

Eddie's Flowers, Inc. will be offering programs for cancer patients including offering "Rick Simpson Oil" as a supplement or complete alternative to traditional cancer treatment. Cannabis flowers are soaked and distilled in alcohol, leaving a highly concentrated oil, of which the customer will take small daily doses. Rick Simpson Oil, or "RSO" is believed to actually stop the growth of cancer cells. While not totally eliminating cancer, RSO is believed to manage cancer, allowing patients to lead a normal life.

Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and distribution policies and procedures, as required by Inventory records as required by
- Seed-to-sale tracking records for all marijuana and MIPs as required in
- Personnel records that include job descriptions, a personnel record for each establishment agent that includes a copy of the establishment agent application submitted to DPH, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all CORI reports obtained.
- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information

- Waste disposal records as required by the Commonwealth.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle

Quality control, including product testing for contaminants in compliance with 935 CMR 500.160;

Testing of Marijuana and Marijuana Products

The establishment shall have all marijuana products tested. Said testing performed by an Independent Testing Laboratory in compliance with the *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana-infused Products*, as amended in November, 2016, published by the DPH. Testing of environmental media (*e.g.*, soils, solid growing media, and water) shall be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Marijuana Dispensaries* published by the DPH.

In the event that laboratory results indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1), the establishment shall notify the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification must be from both Eddie's Flowers, Inc. and the Independent Testing Laboratory, separately and directly. The notification from the Marijuana Establishment will state that it has developed a detailed plan for disposing damaged or excess plants or products. All waste, including that containing in whole or part finished marijuana and MIPs, will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. We will store such waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access

control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer than two establishment agents.
- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.
- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

- (8) The Marijuana Establishment shall maintain the results of all testing for no less than one year;
- (9) The sale of seeds is not subject to these testing provisions.
- (10) Clones are subject to these testing provisions, but are exempt from testing for metals.
- (11) All transportation of marijuana to and from Independent Testing

Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13).

(12) All storage of marijuana at a laboratory providing marijuana testing services shall comply with 935 CMR 500.105(11);

(13) All excess marijuana must be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to the source Marijuana Establishment for disposal or by the Independent Testing Laboratory disposing of it directly; and

(14) No marijuana product shall 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.

Record Keeping

Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions are listed above and will be kept in the usual course of business.

A personnel record for each marijuana establishment agent 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:

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

A staffing plan (see above) 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.

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.
Waste disposal records as required under 935 CMR 500.105(12); and

Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;

Following closure of the Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission. (A bond in the amount of the Establishment's license fee will be placed to ensure the proper destruction of marijuana and marijuana related products upon dissolution.)

Alcohol, smoke, and drug-free workplace

The workplace shall remain alcohol, smoke, and Drug Free. All employees are subject to random testing.

Confidential information

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Marijuana Establishment Agent Training

Eddie's Flowers, Inc. shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff shall receive eight hours of on-going training annually.

Requirements for the Handling of Marijuana

Eddie's Flowers, Inc. shall process the marijuana and related products in a safe and sanitary manner. Eddie's Flowers, Inc. shall process the leaves and flowers of the female marijuana plant only, which shall be:

- Well cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area.

All agents, including those that develop or process non-edible marijuana products, shall comply with the following sanitary requirements:

- Any marijuana establishment agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*;
- All agents working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including:
 - Maintaining adequate personal cleanliness; and
 - 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.
- Hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the Marijuana Establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
- There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
- Litter and waste shall be properly removed, 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 shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);
- Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
- There shall be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;

- Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
- All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
- All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;
- The establishment's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;
- Plumbing shall 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 shall properly convey sewage and liquid disposable waste from the establishment. There shall be no cross-connections between the potable and waste water lines;
- Eddie's Flowers, Inc. shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
- Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and
- Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
- All 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).

Eddie's Flowers, Inc. shall comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*.

Energy Efficiency and Conservation

Eddie's Flowers, Inc. plans on implementing solar power to produce supplemental power and energy efficiency. We will be automating our lighting and heating/AC schedules in order to achieve maximum efficiency. Energy storage will be utilized from excess solar power generation. We are also speaking with our local power companies, exploring available demand reduction resources in compliance with M.G.L. c. 25 §21

Marketing and Advertising

Eddie's Flowers, Inc. has developed a logo that complies with 935 CMR 500.00 that will be used in labeling, signage, and other materials; there are no colloquial references to Marijuana in said logo.

We will not sponsor a charitable, sporting or similar event, except that advertising, marketing, and branding at or in connection with such an event is prohibited 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;

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

"This product may cause impairment and may be habit forming."

"Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of this drug."

"There may be health risks associated with consumption of this product."

"For use only by adults 21 years of age or older. Keep out of the reach of children."

"Marijuana should not be used by women who are pregnant or breastfeeding."

All marketing, advertising and branding produced by or on behalf of Eddie's Flowers, Inc. will include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½)(xxvi): "This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two

hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA.”

The following advertising, marketing, and branding activities will not be conducted pursuant to 935 CMR 500.105:

- advertising, marketing, and branding in such a manner that is deemed to be deceptive, false, misleading, or untrue, or tends to deceive or create a misleading impression, whether directly, or by ambiguity or omission;
- 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; Eddie’s Flowers, Inc. will use media such as The Advocate, and radio that have proven audiences, 85% of which are 21 or older.
- advertising, marketing, and branding that utilizes statements, designs, representations, pictures or illustrations that portray anyone younger than 21 years old;
- 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;
- advertising, marketing, and branding, including statements by a licensee, that makes any false or misleading statements concerning other licensees and the conduct and products of such other licensees;
- advertising, marketing, and branding through certain identified promotional items as determined by the Commission including, but not limited to, gifts, giveaways, coupons, or “free” or “donated” marijuana;
- advertising, marketing, and branding by a licensee that asserts that its products are safe, or represent that its products have curative or therapeutic effects, other than labeling required pursuant to M.G.L. c. 94G, § 4(a½)(xxvi), unless supported by substantial evidence or substantial clinical data with reasonable scientific rigor as determined by the Commission;
- installation of any neon signage or any illuminated external signage which fails to comply with all local ordinances and requirements;
- installation of any external signage that is illuminated beyond the period of 30 minutes before sundown until closing;
- the use of vehicles equipped with radio or loud speakers for the advertising of marijuana;
- the use of radio or loud speaker equipment for the purpose of attracting attention to the sale of marijuana;
- 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;
- operation of any website that fails to verify that the entrant is 21 years of age or older;
- use of unsolicited pop-up advertisements on the internet;

- any advertising, marketing, and branding materials for marijuana products that fails to contain the standard health warning developed by the DPH;
- 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;
- 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;
- advertising, marketing or branding on or in public or private vehicles and at bus stops, taxi stands, transportation waiting areas, train stations, airports, or other similar transportation venues including, but not limited to, vinyl-wrapped vehicles or signs or logos on transportation vehicles or company cars;
- 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;
- advertising or marketing of the price of marijuana products, except that Eddie's Flowers, Inc. shall provide a catalogue or a printed list of the prices and strains of marijuana available at the Establishment to consumers and may post the same catalogue or printed list on its website and in the retail store; and display of marijuana products so as to be clearly visible to a person from the exterior of the Marijuana Establishment.

Waste Disposal

All waste, including that containing in whole or part finished marijuana and MIPs, will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. Eddie's Flowers, Inc. will store such waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer

than two establishment agents.

- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.
- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

Transportation of Marijuana and Marijuana Related Products

General Requirements.

A licensed Marijuana Establishment shall, as an element of its license, be licensed to transport its marijuana products to other licensed establishments, except as otherwise provided herein.

1. Marijuana products may only be transported between licensed Marijuana Establishments by registered marijuana establishment agents.
2. A licensed Marijuana Transporter may contract with a licensed Marijuana Establishment to transport that licensee's marijuana products to other licensed Marijuana Establishments.
3. The originating and receiving licensed Marijuana Establishments shall ensure that all transported marijuana products are linked to the seed-to-sale tracking program. For the purposes of tracking, seeds and clones will be

properly tracked and labeled in a form and manner determined by the Commission.

4. Any marijuana product that is undeliverable or is refused by the destination Marijuana Establishment shall be transported back to the originating establishment.

5. All vehicles transporting marijuana products shall be staffed with a minimum of two marijuana establishment agents. At least one agent shall remain with the vehicle at all times that the vehicle contains marijuana or marijuana products.

6. Prior to leaving a Marijuana Establishment for the purpose of transporting marijuana products, the originating Marijuana Establishment must weigh, inventory, and account for, on video, all marijuana products to be transported.

7. Within eight hours after arrival at the destination Marijuana Establishment, the destination establishment must re-weigh, re-inventory, and account for, on video, all marijuana products transported.

8. When videotaping the weighing, inventorying, and accounting of marijuana products before transportation or after receipt, the video must show each product being weighed, the weight, and the manifest.

9. Marijuana products must be packaged in sealed, labeled, and tamper or child-resistant packaging prior to and during transportation.

10. In the case of an emergency stop during the transportation of marijuana products, a log must be maintained describing the reason for the stop, the duration, the location, and any activities of personnel exiting the vehicle.

11. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transportation times and routes are randomized.

12. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transport routes remain within the Commonwealth.

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

(d) Reporting Requirements.

1. Marijuana establishment agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours of the discovery of such a discrepancy.

2. Marijuana establishment agents shall 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 of such accidents, diversions, losses, or other reportable incidents.

(e) Vehicles.

1. A vehicle used for transporting marijuana products must be:
 - a. owned or leased by the Marijuana Establishment or the Marijuana Transporter;
 - b. properly registered, inspected, and insured in the Commonwealth (documentation of such status shall be maintained as records of the Marijuana Establishment or the Marijuana Transporter, and shall be made available to the Commission upon request);
 - c. equipped with an alarm system approved by the Commission; and
 - d. equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana products.
2. Marijuana products must not be visible from outside the vehicle.
3. Any vehicle used to transport marijuana products shall not bear any markings indicating that the vehicle is being used to transport marijuana products, and any such vehicle shall not indicate the name of the Marijuana Establishment or the Marijuana Transporter.
4. When transporting marijuana products, no other products may be transported or stored in the same vehicle.
5. No firearms may be located within the vehicle or on a marijuana establishment agent

(f) Storage Requirements.

1. Marijuana products must be transported in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products.
2. The storage compartment must be sufficiently secure that it cannot be easily removed.
3. If a Marijuana Establishment, pursuant to a Marijuana Transporter License, or a Marijuana Transporter is transporting marijuana products for more than one Marijuana Establishment at a time, the marijuana products for each Marijuana Establishment shall be kept in a separate locked storage compartment during transportation and separate manifests shall be maintained for each Marijuana Establishment.
4. If a Marijuana Establishment is transporting marijuana products to multiple other establishments, it may seek the Commission's permission to adopt reasonable alternative safeguards.

(g) Communications.

1. Any vehicle used to transport marijuana products shall contain a global positioning system (GPS) monitoring device that is:
 - a. not a mobile device that is easily removable;
 - b. attached to the vehicle at all times that the vehicle contains marijuana products;
 - c. monitored by the Marijuana Establishment or Marijuana Transporter during transport of marijuana products; and
 - d. inspected by the Commission prior to initial transportation of marijuana products, and after any alteration to the locked storage compartment.

2. Each marijuana establishment agent transporting marijuana products shall have access to a secure form of communication with personnel at the originating location at all times that the vehicle contains marijuana and marijuana products.
3. Secure types of communication include, but are not limited to:
 - a. two-way digital or analog radio (UHF or VHF);
 - b. cellular phone; or
 - c. satellite phone.
4. When choosing a type of secure communications, the following shall be taken into consideration:
 - a. cellular signal coverage;
 - b. transportation area;
 - c. base capabilities;
 - d. antenna coverage; and
 - e. frequency of transportation.
5. Prior to, and immediately after leaving the originating location, the marijuana establishment agents shall use the secure form of communication to contact the originating location to test communications and GPS operability.
6. If communications or the GPS system fail while on route, the marijuana establishment agents transporting marijuana products must return to the originating location until the communication system or GPS system is operational.
7. The marijuana establishment agents transporting marijuana products shall contact the originating location when stopping at and leaving any scheduled location, and regularly throughout the trip, at least every 30 minutes.
8. The originating location must have a marijuana establishment agent assigned to monitoring the GPS unit and secure form of communication, who must log all official communications with marijuana establishment agents transporting marijuana products.

(h) Manifests.

1. A manifest shall be filled out in triplicate, with the original manifest remaining with the originating Marijuana Establishment, a second copy provide to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transportation.
2. Prior to transport, the manifest shall be securely transmitted to the destination Marijuana Establishment by facsimile or email.
3. Upon arrival at the destination Marijuana Establishment, a marijuana establishment agent at the destination Marijuana Establishment shall compare the manifest produced by the agents who transported the marijuana products to the copy transmitted by facsimile or email. This manifest must, at a minimum, include;

- h. the originating Marijuana Establishment name, address, and registration number;
 - i. the names and registration numbers of the agents who transported the marijuana products;
 - j. the name and registration number of the marijuana establishment agent who prepared the manifest;
 - k. the destination Marijuana Establishment name, address, and registration number;
 - l. a description of the marijuana products being transported, including the weight and form or type of product;
 - m. the mileage of the transporting vehicle at departure from originating Marijuana Establishment and mileage upon arrival at destination Marijuana Establishment, as well as mileage upon return to originating Marijuana Establishment;
 - n. the date and time of departure from originating Marijuana Establishment and arrival at destination Marijuana Establishment for each transportation;
 - i. a signature line for the marijuana establishment agent who receives the marijuana products;
 - n. the weight and inventory before departure and upon receipt;
 - o. the date and time that the transported products were re-weighed and re-inventoried;
 - p. the name of the marijuana establishment agent at the destination Marijuana Establishment who re-weighed and re-inventoried products; and
 - q. the vehicle make, model, and license plate number.
4. The manifest shall be maintained within the vehicle during the entire transportation process, until the delivery is completed.
5. A Marijuana Establishment shall retain all transportation manifests for no less than one year and make them available to the Commission upon request.

(i) Requirements for Agents.

- 1. Each employee or agent transporting or otherwise handling marijuana products for a Marijuana Transporter must 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 the Marijuana Transporter prior to transporting or otherwise handling marijuana products.
 - 2. A marijuana establishment agent shall carry his or her registration card at all times when transporting marijuana products, and shall produce his or her registration card to the Commission or law enforcement officials upon request.
- (j) Marijuana Transporters shall use best management practices to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts.

- (4) Access to the Commission, Emergency Responders and Law Enforcement.
- (a) The following individuals shall have access to a Marijuana Establishment or Marijuana Establishment transportation vehicle:
1. Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000;
 2. Representatives of other state agencies of the Commonwealth; and
 3. Emergency responders in the course of responding to an emergency.
- (b) 935 CMR 500.000 shall not be construed to prohibit access to authorized law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.
- (5) Energy Efficiency and Conservation. A marijuana establishment must demonstrate consideration of the following factors as part of its operating plan and application for licensure:
- (a) Identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities;
 - (b) Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
 - (c) Strategies to reduce electric demand (such as lighting schedules, active load

Odor Control/Air Purification

One must constantly be conscious of the presence of mold spores within the facility in order to ensure the safety of both the employees and those who depend on product. Proper air purification is necessary to remove mold spores and strong odors from the air. Eddie's Flowers, Inc. will use a commercial air purification system. It is critical to choose one that can reduce VOCs/Vocarbs (Volatile Organic Compounds), and has a carbon filter or another equivalent filtration medium to reduce VOCs. Ours is triple tier.

There are two primary reasons that marijuana establishments need air purification systems. The first is simple grow/show room odor control, as the odor of a large number of cannabis plants, or loose, unsealed flower, together can become overpowering for those working in a establishment environment when left unchecked. The second, and even more important reason, is that grow rooms and marijuana establishments not equipped with air purifiers are likely to develop mold or mildew problems, which can spoil entire crops, and ruin product. Given these applications, an air purifier must be able to remove both odors and the tiny spores that spawn mold and mildew on the plants.

The odors will mainly result from marijuana flower exposed to the air. This will require use of the system on a continuous basis. The carbon filter will be changed as required by the unit manufacturer. The air will be periodically tested to detect mold and other contaminants at least once per week.

SPECIFIC ODOR CONTROL PLAN

4. **Each room in the facility will be fitted with activated carbon filters** sized for optimum performance according to manufacturing specifications. Using these filters is the industry standard of approved control when utilized in a sealed environment like we have in our facility. They use fans to pull air through metal casing packed with small pieces of activated carbon. Odor and contaminants are trapped in tiny pores across each piece of carbon leaving the air scrubbed clean.
 5. **Each room will be fitted with an air neutralizer** designed for use in the NASA space program. This neutralizes negatively charged ions present in the air. This makes them attracted to particles such as odor bacteria, fungus, and other contaminants, and neutralizes them on contact. This effect also sanitizes every surface cracks and crevice in a room in which they are installed. This on its own cancels out odor, and by neutralizing bacteria and fungus, is preventative control against mold, powdery mildew, and plant diseases. The extra sterilization also helps lab environments necessary for tissue culture and cloning.
 6. **A 5 tier filtration system** will also be mounted in each room. The air flows through an activated carbon prefilter that filters out lint and large particles. The second filter is a heap filter that filters out particles down to .3 micron. The third is two UVC ultraviolet filters that kill all mold, bacteria, fungus, and allergens. That works with the fourth, a Photocatalytic Oxidation Filter(POF). The organic matter killed by the UVC (mold, bacteria, fungus, viruses, allergens) is transformed by the photocatalytic oxidation filter by a chemical reaction into carbon dioxide and water. The last filter is a potassium permanganate filter that filters any remaining gasses or traces of odor causing compounds from the air. This filter also is an amazing preventative measure against mold or powdery mildew contamination in the gardens and product.
4. **Our Cultivation building exterior is sealed with an airlock entry**, as well as our separate cultivation wing to keep in odor, and keep out pests, and any diseases or contamination. Each airlock contains an air shower that blows off any microscopic pests, mold or fungus that might travel in on the clothes of employees or float in the air. The second airlock in the cultivation room leads into a locker room where employees shower and change into company uniforms/protective this further insures that no contaminants, pests, or disease hitch a ride into our gardens. Each room inside the cultivation facility is also sealed with air curtains, a small air shower usually installed over doorways. This keeps air from either side from crossing each threshold and is an extra measure against contamination of any kind getting in or out.

It goes without saying that our above odor plan and three layers of sealed facility is also prevention against insect, powdery mildew, and mold infestation. In the unlikely event that any contamination happens in our facility, pest or otherwise, any pesticides or fungicides applied will be in compliance with M.G.L.c 132B, and regulations in 333 CMR 2.00 through CMR 14.00.

500.300: Inspections and Compliance

(6) The Commission or its agents may inspect a Marijuana Establishment and affiliated vehicles at any time without prior notice in order to determine the Marijuana Establishment's compliance with St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000. All areas of a Marijuana Establishment, all marijuana establishment agents and activities, and all records are subject to such inspection. Acceptance of a license by a Marijuana Establishment constitutes consent for such inspection.

(7) Eddie's Flowers, Inc. shall immediately upon request make available to the Commission all information that maybe relevant to a Commission inspection, or an investigation of any incident or complaint.

(8) Eddie's Flowers, Inc. shall make all reasonable efforts to facilitate the Commission's inspection, or investigation of any incident or complaint, including the taking of samples, photographs, video or other recordings by the Commission or its agents, and to facilitate the Commission's interviews of marijuana establishment agents.

(9) An inspection or other investigation may be made prior to the issuance of a license or renewal of registration. Additional inspections may be made whenever the Commission deems it necessary for the enforcement of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000.

(10) During an inspection, the Commission may direct a Marijuana Establishment to test marijuana for contaminants as specified by the Commission, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides not approved for use on marijuana by the Massachusetts Department of Agricultural Resources.

500.310: Deficiency Statements

After an inspection in which a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000, is observed or a violation is otherwise determined to have occurred, the Commission shall issue a deficiency statement citing every violation identified, a copy of which shall be left with or sent to the Marijuana Establishment.

500.320: Plans of Correction

- (5) A Marijuana Establishment shall submit to the Commission a written plan of correction for any violations cited in the deficiency statement issued pursuant to 935 CMR 500.310 within ten business days after receipt of the statement.
- (6) Every plan shall state, with respect to each deficiency, the specific corrective step(s) to be taken, a timetable for such steps, and the date by which compliance with 935 CMR 500.000 will be achieved. The timetable and the compliance dates shall be consistent with achievement of compliance in the most expeditious manner possible.
- (7) The Commission shall review the plan of correction for compliance with the requirements of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000, and shall notify the Marijuana Establishment of either the acceptance or rejection of the plan.
- (8) An unacceptable plan must be amended and resubmitted within five business days after receipt of such notice.

Labeling of Marijuana and Marijuana Products

Labeling of Marijuana Not Sold as a Marijuana Product Prior to marijuana being sold or transferred a Marijuana Cultivator shall ensure the placement of a legible, firmly affixed label on which the wording is no less than 1/16 inch in size on each package of marijuana that it makes available for retail sale, containing at a minimum the following information:

- The name and registration number of the Marijuana Cultivator that produced the marijuana, together with the retail licensee's business telephone number, electronic mail address, and website information, if any;
- The quantity of usable marijuana contained within the package;
- The date that the Marijuana Retailer or Marijuana Cultivator packaged the contents and a statement of which licensee performed the packaging;
- A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and processing;
- The full cannabinoid profile of the marijuana contained within the package, including THC and other cannabinoid level;
- A statement and a seal certifying that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
- This statement, including capitalization: "This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.";
- The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:

- The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:

935 CMR 500.105(5)(a) shall not apply to marijuana packaged by a Marijuana Cultivator for transport to a Marijuana Retailer in compliance with 935 CMR 500.105(13) provided however that the retailer is responsible for compliance with 935 CMR 500.105(5) for all marijuana products sold or displayed for consumers.

Labeling of Edible Marijuana Infused Products

Prior to edible marijuana products being sold or transferred, the Marijuana Product Manufacturer shall place a legible, firmly affixed label on which the wording is no less than $\frac{1}{16}$ inch in size on each edible marijuana product that it prepares for retail sale or wholesale, containing at a minimum the following information:

- The name and registration number of the product manufacturer that produced the marijuana product, together with the product manufacturer's business telephone number, e-mail address, and website information, if any;
- The name of the marijuana product;
- Refrigeration of the product is required, as applicable;
- Net weight or volume in US customary and metric units;
- The quantity of usable marijuana contained within the product as measured in ounces;
- The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;
- A list of ingredients, including the full cannabinoid profile of the marijuana contained within the Marijuana Product, including the amount of delta-nine-tetrahydrocannabinol (9-THC) and other cannabinoids in the package and in each serving of a marijuana product as expressed in absolute terms and as a percentage of volume;
- The serving size of the marijuana product in milligrams if the package is a multiple-serving package;
- The number of serving sizes within the marijuana product based on the limits provided in 935 CMR 500.150;
- The amount, in grams, of sodium, sugar, carbohydrates and total fat per serving;
- The date of creation and the recommended "use by" or expiration date which shall not be altered or changed;
- A batch number, sequential serial number and bar codes when used, to identify the batch associated with manufacturing and processing;
- Directions for use of the marijuana product if relevant;
- A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
- A warning if nuts or other known allergens are contained in the product;
- This statement, including capitalization: "The impairment effects of edible products may be delayed by two hours or more. This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose

potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN”;

- The following symbol or easily recognizable mark issued by the Commission that indicates: the package contains marijuana product



1. The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



935 CMR 500.105(5)(b) shall apply to edible marijuana products produced by a Marijuana Product Manufacturer for transport to a Marijuana Retailer in compliance with 935 CMR 500.105(13) and shall be in addition to any regulation regarding the appearance of edible marijuana products under 935 CMR 500.150.

Labeling of Marijuana Concentrates and Extracts

Prior to marijuana concentrates or extracts being sold or transferred, the Marijuana Product Manufacturer shall place a legible, firmly affixed label on which the wording is no less than $\frac{1}{16}$ inch in size on each marijuana concentrate container that it prepares for retail sale or wholesale, containing at a minimum the following information:

Pursuant to 935 CMR: CANNABIS CONTROL COMMISSION 500.105 labeling will be as

follows.

- The name and registration number of the product manufacturer that produced the marijuana product, together with the product manufacturer's business telephone number, e-mail address, and website information, if any;
 - The name of the marijuana product;
 - Product identity including the word "concentrate" or "extract" as applicable;
 - Net weight of volume expressed in US customary units and metric units;
 - The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;
 - A list of ingredients, including the full *Cannabinoid* profile of the marijuana contained within the Marijuana Product, including the amount of delta-ninetetrahydrocannabinol (9-THC) and other cannabinoids in the package and in each serving of a Marijuana Product as expressed in absolute terms and as a percentage of volume;
 - A statement of the serving size and number of servings per container or amount suggested for use based on the limits provided in 935 CMR 500.150;
 - The date of creation and the recommended "use by" or expiration date;
 - A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and processing;
 - Directions for use of the marijuana product if relevant;
 - A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
 - A warning if nuts or other known allergens are contained in the product;
 - This statement, including capitalization: "This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.";
 - The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:
 - The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:
-
- 935 CMR 500.105(5)(c) shall apply to marijuana concentrates and extracts produced by a Marijuana Product Manufacturer for transport to a Marijuana Retailer in compliance with 935 CMR 500.105(13).

Labeling of Marijuana Infused Tinctures and Topicals

Prior to marijuana infused tinctures or topicals being sold or transferred the Marijuana Product Manufacturer shall place a legible, firmly affixed label on which the wording is no less than $\frac{1}{16}$ inch in size on each container of marijuana infused tincture or topical that it prepares for retail sale or wholesale, containing at a minimum the following information:

- The name and registration number of the product manufacturer that produced the marijuana product, together with the product manufacturer's business telephone number, e-mail address, and website information, if any;

- The marijuana product’s identity;
- The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;
- A list of ingredients, including the full Cannabinoid profile of the marijuana contained within the Marijuana Product, including the amount of delta-nine tetrahydrocannabinol (9-THC) and other cannabinoids in the package and in each serving of a Marijuana Product as expressed in absolute terms and as a percentage of volume;
- Net weight or volume as expressed in US customary units or metric units;
- The date of product creation;
- A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and processing;
- Directions for use of the marijuana product if relevant;
- A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
- A warning if nuts or other known allergens are contained in the product;
- This statement, including capitalization: “This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.”;
- The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:
- The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:

935 CMR 500.105(5)(d) shall apply to marijuana-infused tinctures and topicals produced by a Marijuana Product Manufacturer for transport to a Marijuana Retailer in compliance with 935 CMR 500.105(13).

- (d) In circumstances where the labeling of the marijuana product is unreasonable or impractical, the Marijuana Establishment may include the labeling information on a peel-back label or may place the product in a sealed bag with an insert or additional, easily readable label firmly affixed to that bag.

Packaging

Packaging of Marijuana and Marijuana Products

Tamper or Child-resistant Packaging Licensees licensed subject to 935 CMR 500.050(5) shall ensure that all marijuana products, other than those offered at wholesale by a Marijuana Cultivator, that are provided for sale to consumers by a licensee shall be sold in tamper or child-resistant packaging. To be in compliance with 935 CMR 500.105(6), licensees shall ensure:

1. That to the extent it is not unreasonably impracticable for the specific type of product, marijuana products are packaged in containers that are 935 CMR: CANNABIS

CONTROL COMMISSION:

- opaque or plain in design;
- resealable for any marijuana product intended for more than a single use or containing multiple servings; and
- certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700; or

2. That where compliance with the requirements of tamper or child-resistant packaging is deemed to be unreasonably impracticable, marijuana products shall be placed in an exit package that is:

- capable of being resealed and made tamper or child-resistant resistant again after it has been opened;
- includes the following statement, including capitalization, in at least ten-point Times New Roman, Helvetica or Arial font: KEEP OUT OF REACH OF CHILDREN; and
- is certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging is in compliance with the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700.

Limits on Packaging Design

Packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, shall not be attractive minors. Packaging is explicitly prohibited from:

- using bright colors, defined as colors that are “neon” in appearance;
- imitating or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain marijuana;
- featuring cartoons;
- featuring a design, brand or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors;
- featuring symbols or celebrities that are commonly used to market products to minors;
- featuring images of minors; or
- featuring words that refer to products that are commonly associated with minors or marketed to minors.

▪

Packaging of Multiple Servings.

- 1. Packaging for marijuana products sold or displayed for consumers in multiple servings shall include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica or Arial, including capitalization: “INCLUDES MULTIPLE SERVINGS.”
- 2. Packaging for marijuana products in solid form sold or displayed for consumers in multiple servings shall allow a consumer to easily perform the division into single servings.
 - a. Edible marijuana products in a solid form shall be easily and permanently scored to identify individual servings.

- b. Notwithstanding 935 CMR 500.105(6)(c)2.a., where a product is unable, because of its form, to be easily and permanently scored to identify individual servings, the product shall be packaged in a single serving size. The determination of whether a product is able to be easily and permanently scored shall be decided by the Commission consistent with sub-regulatory guidelines established by the Commission and provided to licensees.
- 3. Packaging for marijuana product beverages shall be packages solely in a single serving size. Multiple serving beverages are strictly prohibited for sale.
- (d) Each single serving of an edible marijuana product contained in a multiple-serving package shall be marked, stamped or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product.
- (e) Serving size shall be determined by the processor but in no instance shall an individual serving size of any marijuana product contain more than five milligrams of delta-nine tetrahydrocannabinol (9-THC).

Production of edible marijuana products shall take place in compliance with the following:

- All edible marijuana products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 500.000: *Good Manufacturing Practices for Food*, and with the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*; and
- Any marijuana product that is made to resemble a typical food or beverage product must be packaged and labeled as required by 935 CMR 500.105(5) and 500.105(6)
- Eddie's Flowers shall satisfy minimum energy efficiency and equipment standards established by the Commission and meet all applicable environmental laws, regulations, permits and other applicable approvals, including those related to water quality and solid waste disposal, and to use additional best management practices as determined by the Commission in consultation with the working group established under St. 2017, c. 55, § 78(b) to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts. If minimum standards or best management practices are not established by the time of an application for initial licensure, a Marijuana Product Manufacturer shall satisfy such standards or best management practices as a condition of license renewal, in addition to any the terms and conditions of any environmental permit regulating the licensed activity.
- Eddie's Flowers, selling or otherwise transferring marijuana to another Marijuana Establishment shall provide documentation of its compliance, or lack thereof, with the testing requirements of 935 CMR 500.160.

Timeline

We will be operational within 60-90 days of final approval by the state and the local licensing authorities.

Equity

Eddie's Flowers, Inc. is dedicated to addressing the disparate impact that cannabis enforcement has had on the community's minority, and less economically fortunate residents. Eddie's Flowers, Inc. shall focus heavily on hiring from those communities and will commit resources to training them in all aspects of the legal cannabis industry.

Eddie's Flowers, Inc. will not just educate, but empower the local community and our neighbors.

Employment

Eddie's Flowers, Inc.'s shareholders currently employ disabled persons, and have always ensured the proper framework was in place to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation, in the operation of our existing businesses.

Community Outreach

Meeting January 25, 2022 on Zoom 5:30 P.M.

**Marijuana Review Team Application
Retail Cannabis Facility
23 Rindge State Road, Ashburnham, MA**



Submitted by:
Eddie's Flowers, Inc.
David A Mech, Esq
1 Crescent Hill
Springfield, MA 01105
(413) 883-3471
Fax: (413) 732-4206
gignation@gmail.com

Retail Operations Plan

Operating Experience

Eddie's Flowers, Inc.'s Board of Directors and Officers are highly experienced non-profit, healthcare, marijuana, and business professionals. Most have developed and operate other cannabis projects within and outside of Massachusetts. The Directors and Officers are committed to operating a within the regulatory standards and to develop as a model within the community.

People

Iyad Jamal, President
576 Main St.

Somers, CT 06071

Iyad, “Eddie” Jamal, at 34, is the American success story. Eddie began with one gas station in Somers CT, and, through hard work, and “long, long, hours”, Eddie Jamal currently owns and operates 7 establishments in both Massachusetts (Holyoke), and Connecticut (Somers), (Plainville), (Manchester). In 2013, Jamal also started a successful Smoke Shop, in Somers, CT, “Bogeys” which also includes the sale of CBD products. The CBD industry is no different than the “Adult Use” Marijuana industry, in that, both are licensed through the Commonwealth of Massachusetts through the Cannabis Control Commission, (Marijuana), and the Department of Agriculture (CBD). The main difference is the THC content in the “flower”. CBD contains less than .03 percent THC, and therefore is not FEDERALLY prohibited.

In Sum, under the direction of Eddie Jamal, Eddie’s Flowers will help make Ashburnham, MA, the Massachusetts “Success Story”.

David A. Mech, Esq., Secretary and General Counsel 1 Crescent Hill Springfield, MA 01105

David Mech is a Massachusetts native, Springfield resident and Eddie’s Flowers, Inc. Secretary. He has been involved all aspects of the medical cannabis industry. In 2010-2011 Mech consulted with medical cannabis patients and assisted them in forming patient cooperatives in Lake County, California, while also gaining hands-on cultivation experience in “The Emerald Triangle”.

Mech was also involved in Arizona’s medical cannabis industry from its inception, co-founding and providing legal representation for various cannabis establishments, including Arizona’s Award winning “Level Up” Dispensary.

In 2012 David Mech founded one of the original medical cannabis certification facilities in Massachusetts’ Pioneer Valley, Community Health Clinics, PLLC, along with Dr. William Cristo, Jr., introducing the concept “Coordinated Care” to physicians and encouraging them to work in unison when addressing the needs of “ complex care” patients for whom medical cannabis is prescribed.

Mech and Cristo also developed Cannascan, a software application that included an online patient verification system linked with medical providers, which allowed law enforcement to verify a patient’s status, before the Department of Public Health issued actual Patient ID Cards.

David is the president and founder of First Aid for our Troops, which since 2005 has helped soldiers and their families upon returning from the Middle East at Walter Reed Medical Center. Mech will also direct Security, hiring professionally trained personnel to ensure the safety of the public. Mech worked for Burns Security for over ten years as a “special operator”. Mech

worked at a moment's notice, in whatever facility he was needed, including large corporations such as Connecticut Natural Gas, in Hartford.

Ruben Marques

Ruben and his growing CBD company Erva, is located in Boston's Jamaica Plain section, a "disproportionately impacted" community, where, Marques and Erva have thrived, despite the many challenges faced. Erva's Mission Statement is as follows:

Erva creates top-of-the-line wellness products from hemp, grown completely naturally and organically, utilizing the various cannabinoids available in the herb to address a wide variety of ailments that affect our society today. Erva stands for whole-plant, solvent free infusions, rather than extractions that utilize solvents. This is a unique approach to processing which aligns with Erva's philosophy of providing community access to the cleanest and purest possible healing hemp products, while keeping our body, soul and environment's health in mind.

Erva, which started its practice in early 2018, has from the beginning participated in community outreach and has helped organize and curate hundreds of small educational gatherings and events bringing like minded people together by providing a safe space for discourse and the sharing of holistic ideas.

Currently, during the Covid-19 pandemic, Erva has shifted its focus to helping the public and especially front-line workers at hospitals to fight the spread of the virus by providing CBD infused hand sanitizers to those who need it. To date Erva has donated over a thousand hand sanitizers. Erva believes in placing 'patients over profits' and is dedicated to continue to do the most important work for the betterment of society and to be the voice for those who are most vulnerable.

John Weiman, Cultivation 58 Primrose Street Indian Orchard, MA 1161

John Weiman is a resident of Springfield with an extensive background in the legal cultivation of recreational and medical cannabis. John's experience dates back to the infancy stage of the cannabis industry. John's experience is practical in that he was involved with indoor and outdoor cultivation. John was a registered grower and license holder from the Oregon Health Authority. Within the industry John is considered an expert and recognized as a Master Gardener/Grower. John's experience from Oregon expanded to include management, identification and treatment for pest and disease. John's experience also includes industrial grow facility design and consultation to Retail Marijuana Establishments.

Location

23 Rindge State Road in Ashburnham, Massachusetts is an ideal location for a retail marijuana establishment. Located at the intersection of Mass. Rtes. 101 and 119, this high traffic location will service local residents along with travelers from all areas in Mass. Nearby Mt. Watatic State Reservation attracts tens of thousands of visitors per year as well.

Traffic

Routes 101 and 119 are designed to accommodate the increase in vehicle traffic that a retail establishment will bring.

Zoning

The site is zoned Commercial, and is in compliance with the zoning regulations for retail sale of cannabis set forth in Article 17, Sec. 5.20. It also complies with all buffer zone requirements as demonstrated below; there are no schools, or residences within 500 feet of the site, and Section 5.10 of the Ashburnham Zoning Bylaws.

Design & Construction

Eddie's Flowers, Inc. will be undertaking to remodel 5,000 square feet of the building interior and a which is anticipated to cost \$300,000.00. The intent is to construct a retail space contain display counter where each bud-tender will have all of the facilities products available. The anticipated construction will be folded into Eddie's Flowers, Inc.'s development of the entire space which includes its retail space.

Fiscal Impact

The proposed use of the building will not create an increase to the fiscal impact upon town of Ashburnham. Eddie's Flowers, Inc. does not anticipate any disruption during construction phase or ultimate operation.

This proposed use is substantially equal to the demand on municipal services required by the former, Country Store's use of the property. While the operation may cause a mild increase in traffic to the facility, the location and infrastructure are more than adequate to accommodate what is anticipated. There are adequate water and sewer services at the location. (see letter/report from Northeast Engineering attached hereto as **Exhibit "F"**.)

Rather than viewing this as a potential negative impact, there would seem to be a significant fiscal advantage in that this would help preserve the real property tax base by having Eddie's Flowers, Inc. as a long-term presence at the property. This facility is completely self-contained (water and septic), thus will not have any impact environmentally.

Eddie's Flowers, Inc. intends on hiring an independent contractor to evaluate and recommend improvements to the safe and sanitary condition of its facility. Eddie's Flowers, Inc. will comply with all permitting and sanitary requirements pursuant to 105 CMR 590.

Public Health and Safety

Eddie's Flowers, Inc. will utilize state of the art security measures inside and outside of the establishment including proper lighting inside and outside of the establishment, as well as proper alarms and video surveillance. The security team will physically monitor the premises 24/7 as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Lighting

Eddie's Flowers, Inc. will install photo cell controlled, directed diode LED pole lamp heads outside of the registered premises that adequately illuminate the facility and its immediate surrounding areas, including the parking and entry areas. In addition to the pole lamps, LED wall pack lighting will be installed on the exterior where needed. All lighting will meet the lighting requirement of the video surveillance devices, allowing for the identification of people, vehicles and license plates. The directed diodes are designed to deflect away from adjacent residential properties.

Exterior wall packs and interior lighting (including exit and emergency lighting) will be served by a backup generator in the event of a power outage.

Cameras

Eddie's Flowers, Inc. will employ a video surveillance system, combining high resolution megapixel Pan, Tilt and Zoom (PTZ) and still cameras, covering all points of entry, as well as the retail, storage, manufacturing and cultivation areas of the facility. This system will have the capability to record, archive and playback video feed for a minimum of ninety (90) days. The system will provide flexibility and multiple streams for efficient operations and prompt investigations. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities. Electronic locks, requiring keypad access codes, will be used to secure the security viewing area. A current list of authorized

employees and service personnel that have access to the surveillance room will be available to law enforcement upon request.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Security Staff

Eddie's Flowers, Inc. will employ adequate security personnel with a focus on hiring officers with a history of military and law enforcement service. They will be equipped with the latest in communication devices and equipment. Eddie's Flowers, Inc. will provide training that also focuses on compassionate de-escalation techniques.

Security Plan

500.110: Security Requirements for Marijuana Establishments

Premises Security

Security measures in compliance with 935 CMR 500.110:

Eddie's Flowers, Inc. utilizes state of the art security measures inside and outside of the establishment. As demonstrated in the written plans for security at Eddie's Flowers, Inc., proper lighting will be installed outside of the establishment, as well as proper alarms and video surveillance. Eddie's Flowers, Inc. Security Team will physically monitor the premises as well. These measures, and proper employee training, will ensure our customers a safe and enjoyable experience.

Eddie's Flowers, Inc. will limit access to all areas of the establishment where marijuana will be cultivated, processed and stored to authorized agents. Eddie's Flowers, Inc. will control access to secure areas through the use of access control devices, including biometric locks (thumbprint access), which will ensure that access is limited to only authorized personnel.

In addition, all staff will be required to visibly wear their provided establishment agent registration card at all times while on-site and when making deliveries.

For added security, visitor access will be strictly controlled. All outside vendors, contractors, and visitors must obtain and wear a visitor identification badge prior to

entering any limited access area. All visitors will be escorted by a security associate escort at all times inside the enclosed, locked facility where marijuana is stored and/or cultivated. All visitors must be logged in and out, and that log will be available for inspection by the Commission at all times. All visitor identification badges must be returned to the escort upon exit.

The outside of the premises will be well lit, and will have video (as described below in “Security Procedures”) and patrolling security personnel, outside the premises 24 hours per day.

Diversion Protection/Employee Theft

There shall be access areas accessible only to specifically authorized personnel. Access to secure areas will be controlled through the use of access control devices, including biometrics or access card locks, which will effectively limit access to only authorized personnel. MAC will post the following statement (at a minimum size of 12” x 12” with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify.

Limited-access areas: “Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only.”

Eddie’s Flowers, Inc. shall provide all establishment agents with varying levels of access to limited access areas depending on their position. For example, the officers will have access to all areas of the establishment facility, including all limited access areas. Associate level positions, on the other hand, will be limited to only those areas directly related to their department and position within their department.

All finished marijuana product shall be stored in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie’s Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will convert the storage space into a walk-in safe (“vault”). We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. Eddie’s Flowers, Inc. employees and

management shall keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. All equipment shall be kept in good working order.

The company shall use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel. All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

CMR 500.110

- Positively identifying individuals seeking access to the premises of the Marijuana Establishment or to whom or marijuana products are being transported pursuant to 935 CMR 500.105(14) to limit access solely to individuals 21 years of age or older;

- As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises.

- Adopting procedures to prevent loitering and ensure that only individuals engaging in activity expressly or by necessary implication permitted by these regulations and its enabling statute are allowed to remain on the premises;

- Prior to entering the establishment, all customers must present valid government identification for visual inspection by a member of our Security team, ensuring the customer is 21 or over. These forms of identification include:

- A valid, unexpired government-issued photo ID card with name, photograph, and date of birth, which matches the information on the Registration Card. This will be limited to one Passport

Once identification has been verified, by a member of our Security team, customers will enter the building through a secure vestibule area; this double-door system will serve as an additional measure to control access to the building. Once a customer's identity has

been verified, only then will they have been granted access to the building.
of the following:

- Driver's License
- Government-issued ID card
- Military ID card

Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc.'s agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain operational during a power outage.

Our comprehensive security plan has been designed to monitor and protect all areas where a compromise to the safety and All medicinal marijuana and Marijuana Infused Products (MIPS) will be stored in Limited Access Areas (LAA) in a secure, locked safe or vault to prevent diversion, theft, and loss. Any marijuana waste generated at the clinic will be stored in a dedicated, secure compartment within the facility, and will be transported back to MAC's cultivation facility for proper, secure disposal in accordance with CCC regulations.

The outside perimeter of the premises will be sufficiently lit to allow for surveillance, and foliage will be removed so as not to allow persons to conceal themselves from sight. Perimeter alarms will be placed on all entry points, and perimeter windows will have duress, panic, and holdup alarms that are connected to local law enforcement systems. The Establishment will have a redundancy alarm system that will ensure an active alarm in the event the primary alarm is compromised and a failure notification system will notify management and local law enforcement in the event of a surveillance system failure within five minutes.

Video cameras will be used in all areas that contain marijuana, all entrances and exits, and in the parking lot. Our surveillance security of the building might occur. Particular emphasis has been placed on customer and staff safety, safeguarding storage, handling and distribution of marijuana. In addition, comprehensive operational policies and procedures have been detailed in the Security Department's Operations Manual.

Eddie's Flowers, Inc. has contracted with a qualified Massachusetts security contractor, Beacon Protection, which specializes in developing thorough security systems to develop and install a superior security system. Eddie's Flowers, Inc. will also use internal loss prevention methods, standard retail cash handling procedures, and track

daily reimbursements and expenses. The security policies and procedures implemented at Eddie's Flowers, Inc. have been proven successful in safeguarding marijuana establishments.

Exceeding the security requirements of Massachusetts law, Eddie's Flowers, Inc. will utilize a comprehensive security system designed to monitor and protect all potential areas of Eddie's Flowers, Inc.. The principal concept of securing the facility focuses on the following three areas:

- Safeguarding the storage of marijuana.
- Providing a safe and secure environment for Eddie's Flowers, Inc. staff, patients and visitors.
- Developing comprehensive audit procedures for the entire operation as related to the handling and distribution of the product.

The security system at Eddie's Flowers, Inc. features four (4) elements that will work together to ensure maximum protection of the facility. These features are described below and include:

- Access Control System
- Intrusion Detection
- Lighting
- Video Surveillance System

Access Control

As part of its security plan, Eddie's Flowers, Inc. will ensure that only Adults over 21 that possess a valid State issue Identification card will have access to its facilities. Individuals not engaged in authorized activity will not be permitted on the premises. Employees must undergo state-mandated criminal history background checks as a condition of their employment. Eddie's Flowers, Inc. agents will be required to visibly display their identification badges at all times. All contractors, vendors, and visitors will be required to log in and out with security, visibly display identification badges, and be escorted by a Eddie's Flowers, Inc. agent.

Cameras will be angled to clearly capture all persons entering and exiting the facility entrances, and will be equipped with backup power sources to ensure that they remain operational during a power outage.

Eddie's Flowers, Inc. will feature an alarm system on all entry points and windows. Motion detectors shall also be placed in all interior portions of the establishment.

Eddie's Flowers, Inc. will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

The establishment shall keep all safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel.

We will install a 'duress alarm' (silent alarm to signal alarm user being forced to turn off system), a 'holdup alarm' (robbery in progress), and a 'panic alarm' (life threatening or emergency situation). Alarms will be placed throughout the establishment at strategic locations coordinated with local public officials.

We will post the following statement (at a minimum size of 12" x 12" with lettering no smaller than 1 inch in height) at all areas of ingress or egress to identify limited-access areas: "Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only."

Eddie's Flowers, Inc. has included a floor plan of our facility with this application, to demonstrate the design scheme and security features to be used at Eddie's Flowers, Inc..

We will limit access to all areas of the establishment facility where marijuana will be processed and stored to authorized establishment agents. All outside vendors, contractors, and visitors must obtain a visitor identification badge prior to entering a limited access area; the visitor identification badge must be visibly displayed at all times while the visitor is in any limited access area. All visitors must be logged in and out, and that log shall be available for inspection by the Department at all times. All visitor identification badges shall be returned upon exit. For added security, we will require that Security accompany any non- establishment agent if a non-establishment agent needs to enter the enclosed, locked facility where marijuana is stored and/or cultivated.

Eddie's Flowers, Inc. will use electric locks with associated card readers to manage exit and entry into limited access areas. We will restrict the availability of access cards only to authorized personnel, which will reduce the risk of access by unauthorized personnel. All access cards must be returned to security personnel at the end of each shift to ensure proper and safe storage.

Trees, bushes and other foliage outside of the Marijuana Establishment shall be maintained so as to prevent a person or persons from concealing themselves from sight.

Intrusion Detection

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana, including the storage safe.

Lighting

Buildings will be well illuminated and video cameras will be at all entry and exit points as well as the parking lot, so as to allow for the capture of clear and certain identification of any person entering or exiting the Establishment or area. Also, video cameras will be positioned in all areas that contain marijuana including the storage safe

Eddie's Flowers, Inc. will install sufficient lighting outside of the registered premises for use each day between sunset and sunrise that adequately illuminates the facility and its immediate surrounding areas, including the parking and entry areas. Exterior lighting will be installed near video surveillance devices to ensure proper illumination for the identification of people, vehicles and license plates. The outdoor lighting will be hooded to deflect light away from adjacent properties. Sufficient exterior lighting will serve as a deterrent for robbery and burglary.

Electronic Surveillance System

The security system must thwart threats at all times, especially outside of store hours where no one will be present. The intrusion detection system must include an alarm system that detects unauthorized access or attempts (including tampering) of all secured entry points, our customer door and cannabis storage room. In case of a break-in or attempted break-in, we will have our intrusion detection system immediately repaired.

We will also install intrusion detection system with a law-enforcement response system. This includes a panic/help-button at the point-of-sale area for employees in case of a robbery or another threat. However, its best practice to ensure our alarm also triggers a response from the police, which will be our first-respondents during nighttime break-ins.

Eddie's Flowers, Inc. will maintain all security system equipment and recordings in a secure location so as to prevent theft, loss, destruction, and alterations. This will be a limited access area featuring electronic locks that allow restricted access to select authorized establishment agents, such as the Security Manager and CEO, as well as law enforcement authorities and the Department.

Eddie's Flowers, Inc. will have a back-up alarm system, with all capabilities of the primary system (this shall not be the same company as the primary security system).

The electronic monitoring system for Eddie's Flowers, Inc. includes a failure notification system that provides both an audio and visual notification should a failure in the electronic monitoring system occur. Additionally, senior management will receive email/text notification of the system failure within five minutes after the failure.

Eddie's Flowers, Inc.'s video surveillance system will have the capability to record, archive and playback video feed for a minimum of 30 days. The electronic recording system hub and all recordings will be stored in a locked, tamper-proof compartment within the security viewing area. This will be a limited access area with entry restricted only to select authorized establishment agents, such as the Security Manager and Executive Director, as well as law enforcement authorities and the Department. A current list of authorized employees and service personnel that have access to the surveillance room will be available to the Department upon request. Electronic locks will be used to secure the security viewing area, access will only be granted to authorized establishment agents.

Our video recording will be operational 24 hours a day/7 days a week. Videos will be retained for a minimum of 90 days or unless requested longer by appropriate authority.

Eddie's Flowers, Inc. will embed a date and time stamp on all recordings. The date and time will be synchronized and set correctly and will not significantly obscure the picture.

Our video cameras will be supported by a backup power supply, ensuring their ability to remain operational during a power outage.

Eddie's Flowers, Inc.'s surveillance system will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. All recordings will be erased or destroyed prior to disposal.

We will maintain a high-quality printer in the security viewing area that is capable of immediately producing a clear still photo from any video camera image.

Eddie's Flowers, Inc. will go to great lengths to protect the confidentiality of our security measures, such as combination numbers, passwords, and electronic lock activators, against threats from unauthorized personnel.

Public Safety Concerns

Contrary to initial concerns, the establishment of a marijuana facility has been shown to actually deter crime in the surrounding community due to the significant investment in security personnel and infrastructure. Several studies have concluded that marijuana facilities do not lead to increased crime in their communities:

- In late 2010, the Denver Police Department analyzed crime rates in areas in and around dispensaries. The Department found that crime was down 8.2% in 2010 when compared with the same period in 2009, and as compared to an 8.8% drop in crime for the city overall.
- In a June 2011 Regent University study, researcher Maura Scherrer found that most crimes, including robbery, vandalism, and disorderly conduct increased in Denver from 2008 to 2009. However, in areas within 1,000 feet of a establishment, rates were down for most types of crime (including a 27.5% reduction in disorderly conduct citations). She concluded, “it appears that crime around the marijuana centers is considerably lower than citywide crime rates; a much different depiction than originally perceived.”
- A March 2014 study by researchers at the Program in Criminology at the University of Texas at Dallas analyzed the FBI’s Uniform Crime Report Data for states across the country between 1990 and 2006 and found that marijuana laws were not proven to have a crime exacerbating effect on any of the seven crime types they analyzed (homicide, forcible rape, robbery, aggravated assault, burglary, larceny, and auto theft). Additionally, they found that marijuana laws preceded reductions in homicide and assault.

The establishment of Eddie’s Flowers, Inc.’s Adult Use Marijuana Establishment will encourage visitors to the neighborhood, while the benefits of an increased security presence around the facility will have a significant positive impact on the entire neighborhood. Eddie’s Flowers, Inc. has a multi-tiered and sophisticated security system, with layers of surveillance cameras used both inside and outside the premises, and security guards employed to ensure safety. Eddie’s Flowers, Inc.’s presence will serve as a general deterrent to criminal activity and other problems on the street, thereby ensuring a safe environment not only for establishment members and staff but also for neighbors and businesses in the surrounding areas.

Abuse/Diversion Prevention Plan

Marijuana Possession and/or Use on Town Property

Eddie's Flowers, Inc. will not allow any burning or consumption of any product containing marijuana or marijuana related products on the premises.

Eddie's Flowers, Inc. will ensure that our customers and employees are educated on the prohibitions surrounding marijuana possession and/or use on city property. All marijuana dispensing operations at Eddie's Flowers, Inc. will take place on private property located within the required zoning district.

Eddie's Flowers, Inc. will display signage, including the following language for restricted access areas.

“Do Not Enter—Limited Access Area—Access Limited to Authorized Personnel Only” in lettering no smaller than one inch in height.

Good Neighbor Policy

“As a member of this community, we ask that you be especially mindful of our neighbors. We have worked hard to establish a positive relationship with our neighbors, the town, and the police department. Please be respectful of our neighbors' rights, privacy and property.

“We encourage you to help us keep our commitments to our neighbors by not creating a nuisance or lingering in the parking lot or sidewalk areas. Always be careful and courteous when entering or exiting the parking lot. These simple precautions will keep neighbor relationships in good standing and help prevent any legal interference with our operations. With your support, we plan to be here to serve you for years to come.”

Code of Conduct

Customers must abide by the following rules and regulations.

All customers must participate in a brief orientation, and provide verified identification.

- State regulations prohibit customers from receiving more than 1 ounce of marijuana and 5 grams of Extracted product per transaction.
- No ingestion of marijuana is allowed on the premises and the smoking of marijuana is not allowed in any public place or on public transportation in the state of

Massachusetts.

- No loud music, unattended barking dogs, or other noise disturbances to the neighborhood are permitted on establishment grounds or nearby premises
- Re-sale of marijuana is prohibited. By state law, all re-sales of medicine will result in immediate suspension of services.
- Loitering and/or littering in our neighborhood is prohibited.
- Posting Eddie's Flowers, Inc. material, including stickers and labels, in public places is prohibited.
- To prevent contamination, customers should never touch the medicine.
- No weapons are allowed at the establishment.
- No littering in the parking lot. All trash must be properly deposited in the trash cans provided.
- All problems and complaints must be directed to Patient Services personnel.

Public Health Consequences

Eddie's Flowers, Inc. is committed to instituting measures in an effort to prevent drugged driving and other adverse public health consequences associated with marijuana use. Eddie's Flowers, Inc. will educate all customers on the use of marijuana. This is especially important if it is the first time the customer is using marijuana, or if the patient is using a different format for ingesting the medicine. Eddie's Flowers, Inc. consultants will provide customers with a comprehensive understanding of our rules, special discount programs and library resources; various methods of cannabis administration and/or ingestion options, and related side effects; safety, effectiveness and techniques relating to edibles and drinks, and the safe consumption of cannabis; information comparing and contrasting Indica vis-à-vis Sativa; and recent scientific literature on clinical applications and health effects of marijuana.

While not every customer will want to ask questions, or discuss his or her medical condition, every customer will be encouraged to ask any questions of Eddie's Flowers, Inc. consultants.

Eddie's Flowers, Inc. believes that our best marketing efforts, and our best product, is the expertise and knowledge of our dispensing staff who can pass along to our patients their knowledge of the effects of different strains, various forms of ingestion, and the use of topical products. This one-on-one personalized service will enable our customers to choose the best and most effective cannabis for their individual needs.

All of the alternative dosage forms are laboratory tested for cannabinoid content, strength and consistency. They are provided to patients in sealed, tamper-proof packaging, and labeled with the name of product, nutritional information, cannabinoid content and other applicable information (i.e. strain, batch, quantity, etc., as

appropriate), to be in compliance with the laws, rules and regulations of the Commonwealth of Massachusetts.

While always exceeding the state's specific standards for product labeling, additional labeling on all medical-cannabis products will include:

- "For Medicinal Use Only, Not For Resale;"
- "Keep Away From Children;"
- "WARNING: Marijuana use can impair an individual's ability to drive a motor vehicle or operate heavy machinery. Marijuana smoke contains carcinogens and can lead to an increased risk for cancer, tachycardia, hypertension, heart attack, and lung infection."

In terms of the public health impact of marijuana, various studies have indicated that the use of marijuana for medical purposes does not pose an immediate threat to public health. In addition, marijuana has been reported as an effective tool in treating opiate addiction. A 2013 study out of Wayne State University Medical School found that marijuana patients consistently reported using marijuana to substitute or wean off prescription narcotic drugs. All interviewed patients and producers reported having reduced their overall drug use, especially the use of opiates, by using marijuana. A 2012 Canadian study found that among marijuana patients from four dispensaries in British Columbia, 75.5% of respondents cited using cannabis as a substitute for another substance (41% reported using cannabis as a substitute for alcohol, 36.1% use cannabis as a substitute for illicit substances, and 67.8% use cannabis as a substitute for prescription drugs).

Preventing Violence, Diversion, and Illegal Activity (Including Trafficking)

In order to ensure our facility has adequate security coverage, we will employ onsite security guards 24 Hours per day, and employ routine patrols outside the Establishment in the parking areas.

All security personnel will be required to complete an intensive department training and formal skills evaluation as a condition of employment. Training will include the proper use of security measures and controls that have been adopted by the establishment for the prevention of diversion, theft, or loss of marijuana; procedures and instructions for responding to an emergency; state and federal statutes and regulations regarding confidentiality of information related to medical use of marijuana. All security personnel will also be required to complete an annual orientation and training seminar.

In addition, we have developed comprehensive security policies and procedures for

employees regarding threats and acts of violence, and reporting security-related incidents such as theft, loss, vandalism, malicious or unauthorized use of company equipment or facilities, and allegations of employee misconduct. The Security Manager is responsible for ensuring this training occurs and for periodically quizzing establishment agents to ensure the knowledge is retained.

We have gone to great lengths to ensure our written policies are comprehensive, practical and suited for the industry. To achieve this, we've worked with leading experts to develop the comprehensive operational guides. All employees, including security personnel, will receive a copy of our Safety Handbook during Orientation Training. The Safety Handbook includes procedures for natural disasters (fire, earthquake, etc.), robbery, biological threats, evacuation plans, as well as safety and security prevention measures to ensure the safest environment possible and the ongoing well-being of members, staff, and the surrounding area.

We will also employ security guards during non-business hours along with our advanced security surveillance and alarm system, which will provide more than sufficient protection of our Establishment and the critical assets stored inside.

We will provide the Police Department, Fire Department, Building Commissioner, Board of Health, and Special Permit Granting Authority with the names, phone numbers and email addresses of all management staff and key holders whom one can provide notice if there are operating problems associated with the facility.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems. At least one contracted guard will be on duty anytime facility staff are in the facility.

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility. During the day-to-day operations and security manager supervisor will oversee these functions. In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security staff and performing the duties

- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design
- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and
- Using recognized best security practices, adhere all security related rules as described in the regulations

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry (Not armed during duty at this time unless determined necessary due to threat)

Staffing

The Retail, Cultivation, and Manufacturing facilities will be staffed by security officers 24/7. This includes weekends holidays and evenings.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors
- Maintain the Security of the various interior sections of each facility, and ensure the security of the exterior areas through video surveillance and personal patrols.

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police

officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities
- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individuals shift and completed with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple issues.
- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Firearms and Weapons

Eddie's Flowers, Inc. will prohibit the presence of firearms and weaponry on all properties. This will be reiterated to our employees and patients during orientation as well as through our handbooks and Code of Conduct. Violations of this policy will result in immediate dismissal of the patient and/or employee.

Eddie's Flowers, Inc. does not intend to utilize armed guards for securing our RMD. Based on industry best practices and the professional experience of our industry advisors, we feel that the use of armed guards in our operations present several significant issues:

- The presence of an armed guard hasn't actually been shown to increase security;
- The range of security measures in our plan (including comprehensive intrusion detection, camera coverage, and limited access areas) work together to go above and beyond in terms of providing a very secure facility;
- The presence of armed guards disturbs the aesthetic of facilities designed to ensure a welcoming and inviting environment for patients; and
- The use of firearms causes tremendous legal issues at the State and Federal level, if a guard were to have to use force within the facility. Protections for the guard's behavior on-site do not exist, and the legal consequences for the use of a firearm in the presence of a controlled substance are unclear.

For these reasons, we will be strictly firearm and weapon free.

Diversions

Eddie's Flowers, Inc.'s POS System, METRC, will be able to identify patterns in customer purchases that may suggest product diversion and/or excess customer possession. Eddie's Flowers, Inc. will prominently post and educate customers on possession limits and reserves the right to refuse sales to a customer who exhibits suspicious purchasing patterns. This system will also prevent and deter employee diversion.

In addition to identifying patterns of abuse, Eddie's Flowers, Inc. will intentionally set product pricing at or above the midpoint of the scale locally to discourage diversion and because of the higher quality of medicine that we will sell. To be conservative, we project a 3-5% annual decline in price for the first four years of operations to remain competitive as more establishments come on-line; however, we will actively monitor our pricing to discourage diversion.

Incident Reporting

We will utilize incident logs (referred to as Incident Reports) to document the occurrence of specific events. Security incidents should be reported in order to provide information to Management for decision-making, recovering lost or stolen property, obtaining restitution for losses, and aiding in the formulation of risk-reduction practices, policies and procedures. Each security Incident Report must be classified using one of the following:

- Any Security incident/law violation which may result in the dismissal or prosecution of employee(s)
- Alarm/False - Fire
- Alarm/False - Security
- Arrests by law enforcement
- Assault, attack, molestation or threats of/to employees while on company property or in the performance of their work
- Break & Enter - Building
- Burglary or attempted burglary of the building(s)
- Confrontations between staff and others
- Damaged Property - malicious or extensive

- Disturbance - Employee/Visitor/Contractor/Visitors
- Drug Abuse
- Fire
- Found Property
- Incidents which have a potential for receiving media coverage
- Injuries to staff, contractors, visitors, clients
- Incidents involving homicide, weapons, hostages, sabotage, explosions or hazardous chemicals
- Lost or stolen product [MUST BE REPORTED TO LOCAL LAW ENFORCEMENT. SEE SECTION BELOW ON REPORTING TO LAW ENFORCEMENT OFFICIALS.]
- Missing Property - Facility/Personal
- Misuse of company information and data processing where financial gain or damage to Eddie's Flowers, Inc. is involved
- Reports of substance abuse or sale of narcotics on property
- Robbery - Armed/Unarmed, or attempted robbery committed on Eddie's Flowers, Inc. property, or of a Eddie's Flowers, Inc. employee in the course of company business, regardless of whether anything was taken
- Sexual Incident - Harassment/Assault/Obscene Call/Other
- Suspicious Person - Contacted
- Suspicious Person - No Contact
- Suspicious Circumstances - General
- Theft or vandalism of property by an employee
- Theft or loss of credit cards
- Theft, forgery or alteration of checks
- Theft, unauthorized disclosure, loss, malicious destruction of proprietary information, or physical assets classified as sensitive, high-risk or confidential to include espionage, eavesdropping or other improper means of obtaining same
- Threat - Bomb
- Threat - Other, received by staff, visitors or contractors
- Trespass

- Vandalism - Facility/Personal/Vehicle
- Violation of any other law on company premises

In general, all thefts, damage, or loss over \$500 should be reported immediately. All security incidents listed above should be reported to the General Manager. Follow-up reports should be submitted concerning any significant developments relating to the incident. All incidents must be formally closed.

Reporting to Local Law Enforcement

In a non-emergency incident or when life/safety is not a concern, security personnel are required to work with the General Manager prior to reporting a relevant security incident to the police.

Any incident involving lost or stolen product must be reported to the Department and to local law enforcement via a police report. All reports must be made within 12 hours of becoming aware of the theft or loss.

To notify authorities, staff will do one of the following:

- Call 911.
- File in-person with the Police Department.
- Submit a written report to the Police Department.

We will investigate all work-related accidents in a timely manner. The Security Manager is responsible for accident investigation, and other management personnel will be involved as needed.

All incidents are documented on individual Incident Reports, but they are also tracked by type, location, and number of incidents on a monthly Incident Summary.

There is one Incident Summary “By Type,” and one “By Location.” Incident Summaries are completed at each month’s end and submitted to the General Manager, along with a copy of all Incident Reports for that month. All Incident Reports shall be maintained indefinitely by the Security Department.

We will notify appropriate law enforcement authorities and the Commission of any breach of security immediately and, in no instance, more than 24 hours following discovery of the breach. Notification shall occur, but not be limited to, during the following occasions:

19. discovery of discrepancies identified during inventory;
20. diversion, theft or loss of any marijuana product;
21. any criminal action involving or occurring on or in the Marijuana Establishment premises;
22. any suspicious act involving the sale, cultivation, distribution, processing or production

of marijuana by any person;

23. unauthorized destruction of marijuana;
24. any loss or unauthorized alteration of records related to marijuana;
25. an alarm activation or other event that requires response by public safety personnel or security personnel privately engaged by the Marijuana Establishment;
26. the failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last more than eight hours; or
27. any other breach of security.

Eddie's Flowers, Inc. shall, within ten calendar days, provide notice to the Commission of any incident described in 935 CMR 500.110(7)(a) by submitting an incident report in the form and manner determined by the Commission which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement authorities were notified.

All documentation related to an incident that is reportable pursuant to 935 CMR 500.110(7)(a) shall be maintained by a Marijuana Establishment for not less than one year or the duration of an open investigation, whichever is longer, and made available to the Commission and law enforcement authorities upon request.

Security Audits

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

Revenue

Eddie's Flowers, Inc. will implement policies and procedures to effectively prevent revenue from the sale of marijuana from supporting criminal enterprises, gangs, and cartels. Our chief financial officer will be responsible for managing all financial tasks for our organization including financial accounting and reporting, payroll preparation and administration, budget preparation, project management accounting, and risk management.

The METRC system is designed to collect data associated with business management including assets, liabilities, monetary transactions, and the like. METRC keeps a real-time record of all processes within the Establishment. Detailed, refined reports may easily be configured to produce the information required by management or upon inspection by state and local regulators. METRC features password protection and unique codes that will be used as electronic signatures. Records will be kept of all logins

and records created or edited during that login time.

Our Operations and Management Practices Plan calls for the organized and secure retention of all business records including: assets and liabilities; monetary transactions; written or electronic accounts that include bank statements, journals, ledgers and supporting documents, agreements, checks, invoices and vouchers; and any other financial accounts reasonably related to the Establishment operations. Management will make frequent sweeps of cash drawers and place cash in the vault along with randomly scheduled cash pickups to deliver cash from the facility to our bank via armored car service.

Emergency Procedures

The establishment shall keep a First Aid kit on the premises at all times

All Agents shall be trained in basic First Aid, including CPR.

In the event of fire, the Vault and other areas shall be cleared, and staff shall escort customers out of the nearest exit, with each employee having specific duties to ensure the orderly evacuation of customers and staff.

A detailed evacuation route shall be posted, and included in the establishment's training manuals. One employee/agent shall be assigned the duty of conducting a head count upon evacuation of the premises.

In addition to any automatic alarms, the appropriate authorities shall be notified of the event, only after the premises are safely evacuated.

Management and Business Operations

Management Plan

Eddie's Flowers, Inc. is a corporation organized under the laws of the Commonwealth of Massachusetts. Eddie's Flowers, Inc. will submit the following (**Exhibit "A"**) when Application is filed:

4. Articles of Organization (attached presently)
5. Bylaws;

Eddie's Flowers, Inc. anticipates receiving a timely and favorable response from the Town of Ashburnham. Eddie's Flowers, Inc. is prepared to submit its application for a Community Host Agreement/Special Permit. Upon approval from the Cannabis

Control Commission it is anticipated that the initial build out will completed within four (4) months.

Eddie's Flowers, Inc. is obtaining a quote to satisfy its insurance requirements outlined within 935 CMR 500.105(10).

Eddie's Flowers, Inc.'s state of the art 2500 square foot facility located at 23 Rindge State Road, will provide expert consultation, providing various forms of high quality cannabis in a safe, secure, welcoming environment. The project, if approved, would initially create at least 22 full time and up to 4 part-time jobs.

We are committed to providing a better quality of life for our customers, through alternative health resources in a professional and compassionate environment, while improving the community through charitable events and services. Aided by education, mutual respect and positive encouragement, "Eddie's Flowers, Inc.", will ensure that customers who enter our center will experience a feeling of security, belonging and well-being.

We will adhere to strict policies and procedures that ensure compliance and transparency in our operations, as well as safety for customers, employees, and community. We will provide only the safest, highest-quality products, featuring rigorous processing, testing, and secure and professional packaging. Our staff will be well trained in applying our care philosophy and we will strive to meet our customers' needs with respect and compassion. We will add value to our community through acts of service, educational offerings, charitable donations, active civic participation and providing free and reduce cost medicine to veterans.

Our unique mix of experience and commitment will enable "Eddie's Flowers, Inc." to be a constant and consistent provider in meeting the needs of the patient community and improving the quality of life for these patients and those around them.

Service Area

The recreational marijuana industry is still in its infancy and is relatively undeveloped compared to most industries. The market is characterized by local culture, with entities taking form based on the social climate of the communities in which they are located.

Community Safety

The building and surrounding areas will be monitored at all times to prevent loitering and any other potential disturbances to the quiet enjoyment of the neighbors and surrounding businesses. Our operating plan carefully considers traffic management;

we will always work diligently to ensure we minimize traffic congestion in the area.

We do not expect that we will experience any undue threats to the security of our facility, our product, our employees, or our prospective patrons. In fact, speculation that marijuana establishments lead to increased crime rates has been largely discredited by empirical and statistical analyses by research and law enforcement agencies.

We anticipate, given our commitment to being model community members and our world-class operating standards, our marijuana establishment will contribute positively to the safety and security of the area surrounding our facility.

In keeping with our commitment to community, we will implement “responsible neighbor” trainings for our staff emphasizing sensitivity to the concerns of neighbors, and will require our staff and patients to adhere to a code of neighborhood conduct. Violation of our good neighbor policies can result in discipline, up to and including termination of employment for a staff member or termination of a patient’s establishment access.

We will continue to work with community stakeholders, public safety agencies, health care professionals and city officials to ensure that the community is confident that we will be a responsible marijuana operator who can add social value and serve as a good neighbor.

Employees

Eddie’s Flowers, Inc. will initially staff its facilities with 15-20 on-site employees for efficient and smooth operations. The staff will include the Retail Establishment General Manager (1), Customer Services Associates (3), Budtenders (13), and Security Associates (3).

Establishment General Manager – Closely supervises the facility in providing customer reception, education and support, customer orientation, and a positive experience overall; ensures the establishment is in strict compliance with all state regulations; ensures educational materials are available to customers; receives and resolves any customer issues; supervises the daily operation of the facility in providing excellent customer service; oversees retail package handling, product display, proper floor storage of medicine, and accurate sales transactions and reporting; ensure full compliance in sales of product; ensures staff provides outstanding customer service by providing absolute accuracy in the sales process; monitors and analyzes sales reports, addresses customer concerns when necessary; oversees inventory and cash controls; orders and receives product; ensures storage, labeling, tracking and reporting of all product and cash, and enforces quality control standards.

Customer Services Associate – Greets customers upon entrance to the establishment,

verifies ID, and checks in customers, conducts new customer orientation and education, orients customers as to their legal rights and responsibilities, addresses questions and resolves complaints, addresses special needs, and assists the Security team in monitoring the establishment's security status.

Sales Associate (Budtender) – Provides outstanding customer service by efficiently providing product, with absolute accuracy in the sales process; ensures product is sold only to adults over the age of 21, or current registered patients over 18, carrying a valid registration card, and that all sales are accurately and comprehensively tracked in the POS system.

Security Associate – Works as a member of the security team to implement security policies and procedures to protect the property, confidentiality and assets from theft, damage or acts of vandalism; acts as a visible resource for the responsible and secure operation of the facility, interacting with customers and staff in a positive manner, while maintaining compliance with establishment rules of conduct and state laws and regulations.

Security Staffing

The licensee will oversee the protection of the facility to protect the facility, products, patients, employees and visitors from identified and identified threats. The facility security will utilize technology and recognize best practices regarding access control, detection of unauthorized intrusions, product theft and diversion prevention, property employee protection, emergency preparedness and incident response to provide this service.

During hours of operation security staff will be working at the facility to monitor the interior perimeter of parking lot of the facility, to create an assist customers, employees and individuals attempting to gain access to the facility. Security agents will greet customers, employees and other individuals at the main entrance of the facility and monitored electronically security systems

The section training supervision of the security staff will be managed by licensee or are their designee. The security staff will be selected, trained and managed using the strict criteria detailed in the Director of Security will oversee the overall security functions of the facility. During the day-to-day operations and security manager supervisor will oversee these functions. In addition to other duties the premises the security supervisor will perform the following:

- Assist and direct all other security staff and performing the duties
- Be responsible for ensuring that all electronic security systems are functioning in accordance with their specifications and design
- Monitor activity to ensure customers, employees, visitor and contractor safety and security
- Protect all marijuana products from theft and diversion of harm from internal external sources
- Assist with the receipt in the audit of all marijuana products
- Provide escort for authorized visitors and contractors and

- Using recognized best security practices, adhere all security related rules as described in the regulations

Security Officer Qualifications

The licensee will contract with a licensed bonded and insured professional security agency to fill the security agent position these contracted employees must meet the following qualifications:

- Former law-enforcement or former resident with military experience preferred
- Good computer and technical skill familiarity with electronic security system is preferred
- Submit to and pass the requirements of the required background checks
- Capable of successfully completing at least two separate employment interviews
- Willingness and desire to work at a high security environment and
- Licensed to carry

Staffing

The facility will be staffed by security officer with the dispensaries open. This includes weekends holidays and evenings. This will include at least one armed guard.

Security officer will perform before of the following duties:

- Assist arriving customers and employees entering the facility
- Act as a deterrent for criminal activity including theft and or diversion of product
- Direct visitors and contractors to the check-in window
- Verify the individuals enter the dispensary are authorized and arrange escort for visitors

Security Staff Credentials and Records

All security related credentials license and is in agreement and training records will be retained and kept on file accordance with the human resource policies and procedures. These records will be available for inspection by authorized government officials. All employee related records are retained for a minimum of 10 years preference will be made for retired local police officers.

Training

All security officers assigned to the facility will have completed and/or participate in the following training:

- A minimum of 16 hours of OTJ (on the job) to be conducted by the security supervisor
- A minimal of 16 hours annually of continuing general security and facility specific training topics

Post orders and procedures will be developed to provide a set of clear concise instructions guidance of expectations for all security personnel the orders will include the following:

- Overview duties and responsibilities
- Emergency contact information specific to the type of incident to report
- Procedures regarding common administrative items
- Emergency procedures
- Outline of duties with specific details

Daily Activity Report

Security staff will maintain a completed Daily Activity Report. This report will detail activities during their shift. The report is started at the beginning of the individual's shift and completed with signatures at the end of the shift. This report details:

All pass down information received from the previous shift.

- All equipment keys, key tabs, etc. received from the previous shift
- A timeline and description of all activities completed
- A communication log with any transportation vehicle
- Any incidents with reference to the Incident Report created
- Confirmation of pass down of information and equipment provided to the relieving officer/supervisor
- Signature of officer/supervisor

Activity reports will be filled in chronological manner, on site for a period of not less than 10 years.

Incident Report

Incident Report will be completed by the officer(s) with direct and indirect involvement regarding security or safety related incidents that may occur on the property. Incident Report will be completed prior to the departure of the officer/supervisor from their shift. This report details:

- A classification of the incident – criminal, safety, medical, property damage, etc.. Both a primary and secondary classification are established for incidents involving multiple issues.
- Date and time of incident and report
- Reporting officer(s) information
- Witnesses and their contact information
- A detailed narrative of the incident
- Reporting officer's role and response to incident
- What, if any, public first responder or law enforcement, responded and their contact information
- Any conclusion, if applicable and available

Incident Reports are viewed by the Director of Security and the security account manager. Additional review and follow-up may be required, depending on the nature and seriousness of the incident. This includes reporting the incidents to local law enforcement.

Eddie's Flowers, Inc. will also coordinate its security efforts with local law enforcement.

Customer Experience

Prior to entering the establishment, all customers must present valid government identification for visual inspection by a member of our Security team, ensuring the customer is 21 or over. These forms of identification include:

- A valid, unexpired government-issued photo ID card with name, photograph, and date of birth, which matches the information on the Registration Card. This will be limited to one of the following:
 - Driver's License
 - Government-issued ID card
 - Military ID card
 - Passport

Once identification has been verified by a member of our Security team, customers will be signed into a text message notification system which will allow the customer to attend to other business at the facility until they are messaged.

The customer will enter the building through a secure vestibule area/mantrap. This double-door system will serve as an additional measure to control access to the building. Once a customer's identity has been verified, and they have been granted access to the building, one of our Customer Services Associates will attend to the customer's product and educational needs.

The establishment floor will consist of a long service counter containing multiple POS stations spaced a minimum of 4' apart from each other. Product will be on display in the counter and secured under glass; the display will be used to help educate customers as to the amount of THC, CBD, Terpenes, and other compounds, and which combination would best suit the customer's needs. However, the displayed medicine will not be accessible to them.

A Customer Care Associate is assigned to each register. The number of registers open at any given time will be based on customer volume.

Customers will wait in a designated line until the next Customer Care Associate is ready to assist the customer. The customer then will present his or her ID Card.

The Customer Care Associate then assists the patient with selecting product, including determining the type of medicine and/or products needed, quantity needed, and price point. Sales Consultants will be extensively and repeatedly trained and evaluated to ensure they have the skills and knowledge to effectively educate customers about types and effects of each product offering and methods of consumption.

Once medicine and products are selected, the Customer Care Associate rings up the customer, receives payment, bags the order, and ensures the customer's purchase data is immediately updated in the establishment's electronic database. Once the transaction is complete, the PCA calls over the next customer from the line cue.

At the conclusion of the sales process, customers will leave the sales floor and exit the building.

Our POS will be capable of debit card and credit card transactions to reduce cash-on-hand with its potential security threats.

To ensure security, a member of the Security team will monitor a live feed of the establishment floor and another member of the Security team will conduct regular walking inspections of all public areas.

Delivery Plan

Marijuana infused products are delivered in "ready for sale" packaging. All product deliveries will take place at varied times to deter predictability. Product delivery days will be randomly scheduled on a "just in time" basis to minimize product requiring storage on site. The vehicle will enter our secure, loading area in the rear of the facility. All deliveries are made in our secure Sally Port, and completed under the watchful eye of our video surveillance system and Security Associate.

Inventory Control

Eddie's Flowers, Inc. has developed detailed Inventory policies and procedures based on best practices in the recreational marijuana industry.

Bulk packaged, inventoried marijuana flowers and preparations, will be stored in a vault within the Inventory department equipped with adequate lighting, ventilation, and temperature and humidity controls.

In addition to being guarded by biometrics locks, keypad access codes, and digital inventory logs, the vault will be monitored 24/7 by remote access camera monitors and

by our security services provider and digitally recorded and indexed for review. Marijuana and marijuana products in the vault will not be removed until needed for transfer or sale. Any marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or for which the containers or packaging have been opened or breached, will be stored in a separate, locked and enclosed “Destroy Box” within the vault until destruction.

Seed-to-Sale Tracking

For inventory management, among other things, Eddie’s Flowers, Inc. plans to utilize METRC. METRC is a fully integrated Point of Sale (POS), Inventory Control, Growhouse Tracking, and Patient/Customer Management system and is one of the only complete seed-to-sale systems available on the market today. This software has been specifically designed to serve registered marijuana dispensaries and is used in the recreational field as well.

From an inventory control perspective, METRC supports ordering, receiving, storing, sales, adjustments, labeling, disposal of unusable medicine, and audits. METRC fully supports the recording and tracking of the daily beginning inventory, daily ending inventory, acquisitions, harvests, sales, disbursements, and disposal of unusable marijuana. Records are retained indefinitely. It is a true seed-to-sale POS solution.

Robust inventory reports in the POS system show current inventory levels. Each product has a unique transaction history that shows every sale and addition/removal from inventory, as well as a date/time stamp and the user ID of the establishment agent who executed the transaction.

The General Manager will conduct and document an audit of the establishment's inventory, using generally accepted accounting principles, at least once every 30-calendar days. At a minimum, per regulations, documentation will include the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory. (Our inventory counts will reflect a great deal more information.)

Should any material reduction in the amount of marijuana in the establishment's inventory occur, Eddie’s Flowers, Inc. will determine where the loss has occurred and take and document corrective action. All losses and/or disappearances must be reported to the Security Manager to determine whether an Incident Report is required.

In addition to a Monthly Inventory Count, the General Manager conducts a Vault Count once a week. The Vault Count is a physical count of all inventory contained in the vault and helps maintain stricter controls and resolve potential problems more quickly.

Our staff will also perform a physical inventory count of all product on the inventory shelf reconciled by the General Manager with the Inventory Shelf Report. The Inventory Shelf Report is a custom POS report that takes the stocked amount – total amount moved from location A (the vault) to location B (the inventory shelf at the service counter) – and subtracts sales. (The Inventory Shelf Report does not include medicine in the vault, as that will be physically counted once a week and compared to the Inventory Vault Report.)

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and distribution policies and procedures, as required by 935 CMR 500.000 et seq.
- Inventory records as required by
- Seed-to-sale tracking records for all marijuana and MIPs as required.
- Personnel records that include job descriptions, a personnel record for each agent that includes a copy of the agent application submitted to CCC, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all CORI reports obtained in accordance with 935 CMR 500.000 et seq.
- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information
- Waste disposal records as required by 935 CMR 500.000 et seq.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a

locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Customer Education

Eddie's Flowers, Inc. will ensure the availability of an adequate supply of up-to-date educational materials. Whenever possible these materials will be available in languages accessible to all patients we serve, as well as for the visually and hearing impaired. These materials will be made available for inspection upon request.

Each customer will receive his or her own copy of our Customer Handbook. The contents of the Handbook contain a wide variety of topics to educate customers about marijuana and Eddie's Flowers, Inc., including:

- Rules and regulations to abide by from state and local laws;
- Research studies on health effects;
- A warning that marijuana has not been analyzed or approved by FDA, that there is limited information on side effects, that there may be health risks associated with using marijuana, and that it should be kept away from children;
- A warning that when under the influence of marijuana, driving is prohibited by M.G.L. c.90, s. 24, and machinery should not be operated;
- Information to assist in the selection of marijuana, describing the potential differing effects of various strains of marijuana, as well as various forms and routes of administration;
- Tools for tracking the strains used by (patients and their caregivers) and their associated effects;
- Information describing the impact of potency and its role in determining proper dosages and titrations for different routes of administration;
- A discussion of tolerance, dependence, and withdrawal;
- Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs;

Service Offerings

Eddie's Flowers, Inc. places a high emphasis on education—we will provide ample information to help customers choose products appropriately and understand how to use them effectively.

Other than services directly related to customers and sales, Eddie's Flowers, Inc. also plans to provide a wide range of other services designed to help customers maintain a healthy lifestyle. Many programs and services will be available at no charge. The list will include workshops, support groups, and other programs, including:

- Modules on marijuana compliance;
- Counseling focusing on proper medication practices and avoiding substance misuse;
- Educational support for those new to the use of marijuana;
- Resource services (referrals for a wide variety of essential life, social and economic services), with an emphasis on the unique needs of our veterans.
- Reading and video materials, providing patient information on marijuana, holistic healing, legality issues, and advocacy/activism;
- Select workshops.

All of these services will be available to customers, free of charge. The retention of services will depend on customer demand and what we learn through our evaluation of community needs.

Additional services, including one or more of those set forth in the list of potential expansion services may be added based upon patient and community feedback.

Customer education will be taking place in the context of virtually every service we offer. As part of our education and counseling, we will offer a library that will include information on general holistic healing, marijuana use, and research. Understanding that patients will have different education levels and reading skills, we plan to offer our material in a variety of formats, including DVD, video, online, and tape formats. We also plan to offer directly and through partner collaborations patient advocate or licensed, clinical, social work services. We will have a full-time staffing position dedicated to:

- Providing one-on-one counseling,
- Managing our referral network to ensure that we have working and trusted alliances with a wide variety of other health care related groups and health care providers, and
- Working with other team members to set up and oversee our slate of customer activities.

To remove barriers to access for certain populations, we plan to offer the following free or reduced-cost services:

- Advocate Referrals. Critical to enabling access to health care will be

providing customers with expert assistance in locating providers and getting necessary referrals. This service will be offered by our center to all customers free of charge.

- Substance Abuse and Misuse Counseling

We recognize the need to provide a safe environment that helps customers avoid substance abuse and misuse. Our employee-members will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependence and withdrawal. In our workshops, clinics and materials, we will emphasize personal responsibility for individual behavior. We will also provide information about the differing strengths of marijuana strains and products, as well as the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, nonprescription drugs, and supplements. Finally, working with our managers, customer education about the potential abuse of marijuana will be integrated in all patient visits, materials and outreach.

Employee Training

Eddie's Flowers, Inc. has a comprehensive training curriculum that instructs department managers how to train staff members, and ensure comprehension and performance levels by using a Final Performance Test for each employee. The Final Performance Tests are comprised of demonstrable and measurable skills and knowledge required to perform basic job functions as identified in job descriptions. All employees will be required to pass a Final Performance Test before being moved out of their probationary employment period.

The overall training curriculum is comprised of Leader's Guides, which provide scripts for teaching all of the policies and procedures contained in the Operations Manuals and Trainee Workbooks that serve as a resource for each new hire during his or her training period. The training tools reference our Operations Manuals and operational supplements so that all employees are consistently and properly trained. These training references to official operational content reinforce employees' understanding that all policies and procedures are found in the Operations Manuals and operational supplements should they ever have questions.

The training curriculum also provides Quizzes and Daily Recaps to ensure the retention of detailed learning and performance objectives throughout the training process. All training is documented and filed in each employee's human resource file securely located in the GM's office.

All employees go through Orientation Training, Safety Training, and Medical Training, irrespective of department. Upon completion of those modules, employees then complete their respective departmental training programs that cover all of the policies, procedures, knowledge, and skills required to operate effectively and in full compliance

within the respective departments.

Eddie's Flowers, Inc.'s Orientation training module will generally be conducted by the GM. The following is covered during Orientation:

- Welcoming of the new hire
- Completion of paperwork and administrative tasks such as assigning POS logins, email addresses, etc.
- Review of the Establishment Handbook
- Review of the Employee Handbook, detailed instruction, and quiz
- Review of the Safety Handbook
- Legal training, including all state and federal laws relating to marijuana and marijuana, legal obligations of licensed marijuana entities, rules and regulations of the establishment, sexual harassment (no tolerance), effective interaction with law enforcement personnel, and the rights and responsibilities of marijuana patients
- Tour of the facilities and introductions to fellow staff
- Injury & Illness Prevention Program

Safety training immediately follows Orientation Training and will be conducted by a member of the Security management team. In addition to its focus on safety, safety training will include acceptable currency identification and counterfeit detection, warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution techniques, and diversion detection techniques.

Medical Training will be conducted by Eddie's Flowers, Inc.'s Medical Director (William Cristo, Jr.) Medical Training may be conducted at any point in the employee's initial training period so long as it is completed before the employee's Final Performance Test.

Medical Training topics will include:

- Rights of and sensitivity toward disabled individuals
- How to identify and interact with a customer having a medical emergency
- Marijuana Risks & Benefits Training
- Cannabis Use Patterns and the Detection of Dependence
- How to effectively refuse marijuana to patients who appear impaired or abusing marijuana

****Only authorized establishment agents who have been trained on privacy and recordkeeping policy and procedures will have access to Eddie's Flowers, Inc.'s records.**

In addition to associate level training, all management level employees including members of the Executive Management Team are required to successfully complete a week-long, 8-hour a day, intensive management training course conducted by industry experts and other seasoned professionals with expertise in areas of management (HR, legal, financial, medical, etc.).

At a minimum staff will receive 8 hours of ongoing training each year, but generally much more.

Substance Abuse and Misuse Counseling/Training

We recognize the need to provide a safe environment that helps customers avoid substance abuse and misuse. Our employee-members will be trained to recognize the signs and symptoms of substance abuse, including tolerance, dependence and withdrawal. In our workshops, clinics and materials, we will emphasize personal responsibility for individual behavior. We will also provide information about the differing strengths of marijuana strains and products, as well as the potential drug-to-drug interactions, including interactions with alcohol, prescription drugs, nonprescription drugs, and supplements. Finally, working with our managers, customer education about the potential abuse of marijuana will be integrated in all patient visits, materials and outreach.

Diversion and Unsafe Practices

Any marijuana establishment agent who has:

Diverted marijuana shall be reported to law enforcement officials and to the Commission; or
Engaged in unsafe practices with regard to operation of the Marijuana Establishment, shall 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 shall be reported to the Commission.

Said employee shall be subject to immediate dismissal for any of the above infractions.

Marijuana Establishment's hours of operation and after-hours contact information.

Hours of Operation: Monday -Sunday 8:00 a.m.- 9:00 p.m.

Contact Info: David Mech 1 Crescent Hill Springfield, MA 01105 413-883-3471

Storage of Marijuana in Compliance with 935 CMR 500.105(11);

Eddie's Flowers, Inc. will store all finished marijuana product in a private, secured vault room that is climate-controlled and monitored 24-hours a day, for both security and Eddie's Flowers, Inc. in environment (temperature and humidity). Rather than using a traditional safe, we will construct steel vaults. We will need to store a large amount of processed product, along with a secure freezer and refrigerator to store marijuana infused products (MIPs), requiring the conversion of the storage space into a vault room rather than a single, stand-alone safe. We will store cash and other valuables in a secure safe located inside the vault room.

Access to the secure storage area will be heavily restricted and monitored through the use of electronic locks. For example, only select employees who have been authorized by management will have access to the secured storage area. This will be monitored through staff credentials. We will keep our safes and vaults securely locked and protected from entry via electronic locks, except for the actual time required to remove or replace marijuana, as conducted by authorized personnel. We will keep all locks and security equipment in good working order, via regular inspections and testing, not to exceed 30 calendar days from the previous - inspection and test.

Description of the various strains of marijuana to be cultivated, processed or sold, as applicable, and the form(s) in which marijuana will be sold;

Eddie's Flowers, Inc. will offer proprietary strains offering particular benefits for specific ailments. There are too many particular strains available to mention individually. However, marijuana consists of two basic strains, Sativa and Indica, with most marijuana being comprised of various combinations of Indica and Sativa, or hybrids. Our products will be sold in flower form, and in various products using THC and CBD extracted from flower by Hydrocarbon, Distillate, and CO 2 Extraction.

Products and flowers with various combinations of THC and CBD are used to treat various conditions. We will provide a variety of products depending on a customer's needs and will even custom manufacture product to a customer's specifications.

Cancer

The traditional treatment of cancer has consisted of chemotherapy and radiation, which basically prolongs life by slowing down the progress of cancers, but does not control the progress.

Eddie's Flowers, Inc. will be offering programs for cancer patients including offering "Rick Simpson Oil" as a supplement or complete alternative to traditional cancer treatment. Cannabis flowers are soaked and distilled in alcohol, leaving a highly concentrated oil, of which the customer will take small daily doses. Rick Simpson Oil, or "RSO" is believed to actually stop the growth of cancer cells. While not totally eliminating cancer, RSO is believed to manage cancer, allowing patients to lead a normal life.

Procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) and (9);

Recordkeeping

Eddie's Flowers, Inc. will implement recordkeeping policies and procedures, including the tracking of customer records, including purchases, denials of sale, any delivery options, confidentiality and retention. In addition, Eddie's Flowers, Inc. will implement recordkeeping policies and procedures to ensure that records are maintained as required in any section of 935 CMR 500.000 et seq. Specifically, Eddie's Flowers, Inc. will maintain the following records:

- Operating procedures including security measures, employee security policies, storage of marijuana, recordkeeping and inventory protocols, plans for staffing and quality control, emergency procedures, drug-free workplace policies, customer education description, pricing standards and procedures, production and distribution policies and procedures, as required by Inventory records as required by
- Seed-to-sale tracking records for all marijuana and MIPs as required in
- Personnel records that include job descriptions, a personnel record for each establishment agent that includes a copy of the establishment agent application submitted to DPH, performance evaluations, documentation of all required training and verification of reference, a staffing plan, personnel policies and procedures, and all

CORI reports obtained.

- Business records including assets and liabilities, monetary transactions, books of account, sales records, and salary and wage information
- Waste disposal records as required by the Commonwealth.

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle

Quality control, including product testing for contaminants in compliance with 935 CMR 500.160;

Testing of Marijuana and Marijuana Products

(15) The establishment shall have all marijuana products tested. Said testing performed by an Independent Testing Laboratory in compliance with the *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana-infused Products*, as amended in November, 2016, published by the DPH. Testing of environmental media (*e.g.*, soils, solid growing media, and water) shall be performed in compliance with the *Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Marijuana Dispensaries* published by the DPH.

In the event that laboratory results indicate contaminant levels are above acceptable limits established in the DPH protocols identified in 935 CMR 500.160(1), the establishment shall notify the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the production batch. The notification must be from both Eddie's Flowers, Inc. and the Independent Testing Laboratory, separately and directly. The notification from the Marijuana Establishment will state that it has developed a detailed plan for disposing damaged or excess plants or products. All waste, including that containing in whole or part finished marijuana and MIPs, will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. We will store such

waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer than two establishment agents.
- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.
- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

(16) The Marijuana Establishment shall maintain the results of all testing for no less than one year;

(17) The sale of seeds is not subject to these testing provisions.

(18) Clones are subject to these testing provisions, but are exempt from testing for metals.

(19) All transportation of marijuana to and from Independent Testing Laboratories providing marijuana testing services shall comply with 935 CMR 500.105(13).

(20) All storage of marijuana at a laboratory providing marijuana testing services shall comply with 935 CMR 500.105(11);

(21) All excess marijuana must be disposed in compliance with 935 CMR 500.105(12), either by the Independent Testing Laboratory returning excess marijuana to the source Marijuana Establishment for disposal or by the Independent Testing Laboratory disposing of it directly; and

(22) No marijuana product shall 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.

Staffing plan and staffing records in compliance with 935 CMR 500.105(9);

Employees

Eddie's Flowers, Inc. will initially staff its facility with approximately twenty on-site employees for efficient and smooth operations. The staff will include the Retail Establishment General Manager (1), a Customer Services Associate (4), Budtenders (13), and Security Associates (2).

Establishment General Manager – Closely supervises the facility in providing customer reception, education and support, customer orientation, and a positive experience overall; ensures the establishment is in strict compliance with all state regulations; ensures educational materials are available to customers; receives and resolves any customer issues; supervises the daily operation of the facility in providing excellent customer service; oversees retail package handling, product display, proper floor storage of medicine, and accurate sales transactions and reporting; ensure full compliance in sales of product; ensures staff provides outstanding customer service by providing absolute accuracy in the sales process; monitors and analyzes sales reports, addresses customer concerns when necessary; oversees inventory and cash controls; orders and receives product; ensures storage, labeling, tracking and reporting of all

product and cash, and enforces quality control standards.

Customer Services Associate – Greets customers upon entrance to the establishment, verifies ID, and checks in customers, conducts new customer orientation and education, orients customers as to their legal rights and responsibilities, addresses questions and resolves complaints, addresses special needs, and assists the Security team in monitoring the establishment's security status.

Sales Associate (Budtender) – Provides outstanding customer service by efficiently providing product, with absolute accuracy in the sales process; ensures product is sold only to adults over the age of 21 and that all sales are accurately and comprehensively tracked in the POS system.

Security Associate – Works as a member of the security team to implement security policies and procedures to protect the property, confidentiality and assets from theft, damage or acts of vandalism; acts as a visible resource for the responsible and secure operation of the facility, interacting with customers and staff in a positive manner, while maintaining compliance with establishment rules of conduct and state laws and regulations.

Record Keeping

Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions are listed above and will be kept in the usual course of business.

A personnel record for each marijuana establishment agent 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:

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

A staffing plan (see above) 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.

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.

Waste disposal records as required under 935 CMR 500.105(12); and

Emergency procedures, including a disaster plan with procedures to be followed in case of fire or other emergencies;

Following closure of the Marijuana Establishment, all records must be kept for at least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission. (A bond in the amount of the Establishment's license fee will be placed to ensure the proper destruction of marijuana and marijuana related products upon dissolution.)

Alcohol, smoke, and drug-free workplace

The workplace shall remain alcohol, smoke, and Drug Free. All employees are subject to random testing.

Confidential information

Eddie's Flowers, Inc. will utilize METRC – an encrypted, secure electronic marijuana industry database that is strictly controlled and continually backed up to store required records.

All systems accessed by establishment agents will be password protected. In addition, each authorized agent will be assigned a unique code, that will be used as their electronic signature. A record will be kept of all logins and records created or edited during that login time. Any paper documents that require retention will be stored in a locked cabinet with access limited to the Patient Services Manager and General Manager. Any hard-copy information not stored will be shredded and disposed of in a secure receptacle.

Marijuana Establishment Agent Training

Eddie's Flowers, Inc. shall ensure that all marijuana establishment agents complete training prior to performing job functions. Training shall be tailored to the roles and responsibilities of the job function of each marijuana establishment agent, and at a minimum must include a Responsible Vendor Program under 935 CMR 500.105(2)(b). At a minimum, staff shall receive eight hours of on-going training annually.

Requirements for the Handling of Marijuana

Eddie's Flowers, Inc. shall process the marijuana and related products in a safe and sanitary manner. Eddie's Flowers, Inc. shall process the leaves and flowers of the female marijuana plant only, which shall be:

- Well cured and generally free of seeds and stems;
- Free of dirt, sand, debris, and other foreign matter;
- Free of contamination by mold, rot, other fungus, and bacterial diseases;
- Prepared and handled on food-grade stainless steel tables; and
- Packaged in a secure area.

All agents, including those that develop or process non-edible marijuana products, shall comply with the following sanitary requirements:

- Any marijuana establishment agent whose job includes contact with marijuana or nonedible marijuana products, including cultivation, production, or packaging, is subject to the requirements for food handlers specified in 105 CMR 300.000: *Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements*;
- All agents working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including:
 - Maintaining adequate personal cleanliness; and
 - 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.
- Hand-washing facilities shall be adequate and convenient and shall be furnished with running water at a suitable temperature. Hand-washing facilities shall be located in the Marijuana Establishment in production areas and where good sanitary practices require employees to wash and sanitize their hands, and shall provide effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices;
- There shall be sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations;
- Litter and waste shall be properly removed, 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 shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12);

- Floors, walls, and ceilings shall be constructed in such a manner that they may be adequately kept clean and in good repair;
- There shall be adequate safety lighting in all processing and storage areas, as well as areas where equipment or utensils are cleaned;
- Buildings, fixtures, and other physical facilities shall be maintained in a sanitary condition;
- All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition. Such surfaces shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the US Environmental Protection Agency (EPA), in accordance with labeled instructions. Equipment and utensils shall be so designed and of such material and workmanship as to be adequately cleanable;
- All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products;
- The establishment's water supply shall be sufficient for necessary operations. Any private water source shall be capable of providing a safe, potable, and adequate supply of water to meet the Marijuana Establishment's needs;
- Plumbing shall 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 shall properly convey sewage and liquid disposable waste from the establishment. There shall be no cross-connections between the potable and waste water lines;
- Eddie's Flowers, Inc. shall provide its employees with adequate, readily accessible toilet facilities that are maintained in a sanitary condition and in good repair;
- Products that can support the rapid growth of undesirable microorganisms shall be held in a manner that prevents the growth of these microorganisms; and
- Storage and transportation of finished products shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or their containers.
- All 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).

Eddie's Flowers, Inc. shall comply with sanitary requirements. All edible products shall be prepared, handled, and stored in compliance with the sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*.

Energy Efficiency and Conservation

Eddie's Flowers, Inc. plans on implementing solar power to produce supplemental power and energy efficiency. We will be automating our lighting and heating/AC schedules in order to achieve maximum efficiency. Energy storage will be utilized from excess solar power generation. We are also speaking with our local power companies, exploring available demand reduction resources in compliance with M.G.L. c. 25 §21. Additionally we may build a power plant if demand requires.

Marketing and Advertising

Eddie's Flowers, Inc. has developed a logo that complies with 935 CMR 500.00 that will be used in labeling, signage, and other materials; there are no colloquial references to Marijuana in said logo.

We will not sponsor a charitable, sporting or similar event, except that advertising, marketing, and branding at or in connection with such an event is prohibited 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;

We will display, in secure, locked cases, samples of each product offered for sale and subject to the requirements of 935 CMR 500.110. These display cases will be transparent. We will also remove a sample of marijuana from the case and provide it to the consumer for inspection, provided the consumer may not consume or otherwise use the sample unless otherwise authorized herein.

The establishment will post prices in the store and may respond to questions about pricing on the phone.

The Establishment will engage in reasonable marketing, advertising and branding practices that are not otherwise prohibited in 935 CMR 500.105(4)(b) that do not jeopardize the public health, welfare or safety of the general public or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising and branding created for viewing by the public will include the statement "Please Consume Responsibly," in a

conspicuous manner on the face of the advertisement and shall include a minimum of two of the following warnings in their entirety in a conspicuous manner on the face of the advertisement:

“This product may cause impairment and may be habit forming.”

“Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of this drug.”

“There may be health risks associated with consumption of this product.”

“For use only by adults 21 years of age or older. Keep out of the reach of children.”

“Marijuana should not be used by women who are pregnant or breastfeeding.”

All marketing, advertising and branding produced by or on behalf of Eddie’s Flowers, Inc. will include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½)(xxvi): “This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN. There may be health risks associated with consumption of this product. Marijuana can impair concentration, coordination, and judgment. The impairment effects of edible marijuana may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA.”

The following advertising, marketing, and branding activities will not be conducted pursuant to 935 CMR 500.105:

- advertising, marketing, and branding in such a manner that is deemed to be deceptive, false, misleading, or untrue, or tends to deceive or create a misleading impression, whether directly, or by ambiguity or omission;
- 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; Eddie’s Flowers, Inc. will use media such as The Advocate, and radio that have proven audiences, 85% of which are 21 or older.
- advertising, marketing, and branding that utilizes statements, designs, representations, pictures or illustrations that portray anyone younger than 21 years old;
- 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;
- advertising, marketing, and branding, including statements by a licensee, that makes any false or misleading statements concerning other licensees and the conduct and products of such other licensees;
- advertising, marketing, and branding through certain identified promotional items as

determined by the Commission including, but not limited to, gifts, giveaways, coupons, or “free” or “donated” marijuana;

- advertising, marketing, and branding by a licensee that asserts that its products are safe, or represent that its products have curative or therapeutic effects, other than labeling required pursuant to M.G.L. c. 94G, § 4(a½)(xxvi), unless supported by substantial evidence or substantial clinical data with reasonable scientific rigor as determined by the Commission;
- installation of any neon signage or any illuminated external signage which fails to comply with all local ordinances and requirements;
- installation of any external signage that is illuminated beyond the period of 30 minutes before sundown until closing;
- the use of vehicles equipped with radio or loud speakers for the advertising of marijuana;
- the use of radio or loud speaker equipment for the purpose of attracting attention to the sale of marijuana;
- 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;
- operation of any website that fails to verify that the entrant is 21 years of age or older;
- use of unsolicited pop-up advertisements on the internet;
- any advertising, marketing, and branding materials for marijuana products that fails to contain the standard health warning developed by the DPH;
- 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;
- 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;
- advertising, marketing or branding on or in public or private vehicles and at bus stops, taxi stands, transportation waiting areas, train stations, airports, or other similar transportation venues including, but not limited to, vinyl-wrapped vehicles or signs or logos on transportation vehicles or company cars;
- 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;
- advertising or marketing of the price of marijuana products, except that Eddie’s Flowers, Inc. shall provide a catalogue or a printed list of the prices and strains of marijuana available at the Establishment to consumers and may post the same catalogue or printed list on its website and in the retail store; and display of marijuana products so as to be clearly visible to a person from the exterior of the Marijuana Establishment.

Waste Disposal

All waste, including that containing in whole or part finished marijuana and MIPs,

will be secured, managed, and secured in accordance with applicable state and local statutes, ordinances and regulations. Eddie's Flowers, Inc. will store such waste inside locked, odor-limiting receptacles. These will be located within the vault equipped with video surveillance and bioMETRC locks.

Entry to and exit from the vault will be monitored through use of a sophisticated access control system.

Damaged plants will be disposed of in the same manner as solid waste. A detailed log will be maintained of all damaged and/or unusable product scheduled for destruction, and will include the date, type and quantity disposed of, the manner of disposal and the name and signature of establishment agent authorized to conduct the destruction.

As required by MA law, solid waste will be disposed of in the following ways:

- Through incineration in a commercial or municipal waste combustor in Massachusetts holding a valid permit issued by the Department of Environmental Protection (DEP), witnessed and documented by no fewer than two establishment agents.
- Disposal in a landfill holding a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located, witnessed and documented by no fewer than two establishment agents.
- Grinding and incorporating the marijuana waste with solid wastes such that the resulting mixture renders the marijuana waste unusable. Once such marijuana waste has been rendered unusable, it will be either disposed of in a solid waste management facility that holds a valid permit issued by the DEP or by the appropriate state agency in the state in which the facility is located or, if the material mixed with the marijuana waste is organic material as defined in 310 CMR 16.02, the mixture will be composted at an operation that is in compliance with the requirements of 310 CMR 16.00.

Any liquid waste resulting from the MIP production process will be disposed of in compliance with requirements for discharge into surface water, groundwater and sewers, or disposed of in an industrial wastewater holding tank in accordance with 314 CMR 18.00.

When marijuana or MIPs are disposed of, Eddie's Flowers, Inc. will create and maintain a written record of the date, the type and quantity disposed of, the manner of disposal, and the name and signature of persons present during disposal. Disposal records will be kept for at least two years.

Transportation of Marijuana and Marijuana Related Products

General Requirements.

1. A licensed Marijuana Establishment shall, as an element of its license, be licensed to transport its marijuana products to other licensed establishments, except as otherwise provided herein.
2. Marijuana products may only be transported between licensed Marijuana Establishments by registered marijuana establishment agents.
3. A licensed Marijuana Transporter may contract with a licensed Marijuana Establishment to transport that licensee's marijuana products to other licensed Marijuana Establishments.
4. The originating and receiving licensed Marijuana Establishments shall ensure that all transported marijuana products are linked to the seed-to-sale tracking program. For the purposes of tracking, seeds and clones will be properly tracked and labeled in a form and manner determined by the Commission.
5. Any marijuana product that is undeliverable or is refused by the destination Marijuana Establishment shall be transported back to the originating establishment.
6. All vehicles transporting marijuana products shall be staffed with a minimum of two marijuana establishment agents. At least one agent shall remain with the vehicle at all times that the vehicle contains marijuana or marijuana products.
7. Prior to leaving a Marijuana Establishment for the purpose of transporting marijuana products, the originating Marijuana Establishment must weigh, inventory, and account for, on video, all marijuana products to be transported.
8. Within eight hours after arrival at the destination Marijuana Establishment, the destination establishment must re-weigh, re-inventory, and account for, on video, all marijuana products transported.
9. When videotaping the weighing, inventorying, and accounting of marijuana products before transportation or after receipt, the video must show each product being weighed, the weight, and the manifest.
10. Marijuana products must be packaged in sealed, labeled, and tamper or child-resistant packaging prior to and during transportation.
11. In the case of an emergency stop during the transportation of marijuana products, a log must be maintained describing the reason for the stop, the duration, the location, and any activities of personnel exiting the vehicle.
12. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transportation times and routes are randomized.

13. A Marijuana Establishment or a Marijuana Transporter transporting marijuana products shall ensure that all transport routes remain within the Commonwealth.

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

(e) Reporting Requirements.

1. Marijuana establishment agents must document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours of the discovery of such a discrepancy.

2. Marijuana establishment agents shall 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 of such accidents, diversions, losses, or other reportable incidents.

(f) Vehicles.

1. A vehicle used for transporting marijuana products must be:

a. owned or leased by the Marijuana Establishment or the Marijuana Transporter;

b. properly registered, inspected, and insured in the Commonwealth (documentation of such status shall be maintained as records of the Marijuana Establishment or the Marijuana Transporter, and shall be made available to the Commission upon request);

c. equipped with an alarm system approved by the Commission; and

d. equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana products.

2. Marijuana products must not be visible from outside the vehicle.

3. Any vehicle used to transport marijuana products shall not bear any markings indicating that the vehicle is being used to transport marijuana products, and any such vehicle shall not indicate the name of the Marijuana Establishment or the Marijuana Transporter.

4. When transporting marijuana products, no other products may be transported or stored in the same vehicle.

5. No firearms may be located within the vehicle or on a marijuana establishment agent

(g) Storage Requirements.

1. Marijuana products must be transported in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products.

2. The storage compartment must be sufficiently secure that it cannot be easily removed.

3. If a Marijuana Establishment, pursuant to a Marijuana Transporter License, or a Marijuana Transporter is transporting marijuana products for

more than one Marijuana Establishment at a time, the marijuana products for each Marijuana Establishment shall be kept in a separate locked storage compartment during transportation and separate manifests shall be maintained for each Marijuana Establishment.

4. If a Marijuana Establishment is transporting marijuana products to multiple other establishments, it may seek the Commission's permission to adopt reasonable alternative safeguards.

(h) Communications.

1. Any vehicle used to transport marijuana products shall contain a global positioning system (GPS) monitoring device that is:
 - a. not a mobile device that is easily removable;
 - b. attached to the vehicle at all times that the vehicle contains marijuana products;
 - c. monitored by the Marijuana Establishment or Marijuana Transporter during transport of marijuana products; and
 - d. inspected by the Commission prior to initial transportation of marijuana products, and after any alteration to the locked storage compartment.
2. Each marijuana establishment agent transporting marijuana products shall have access to a secure form of communication with personnel at the originating location at all times that the vehicle contains marijuana and marijuana products.
3. Secure types of communication include, but are not limited to:
 - a. two-way digital or analog radio (UHF or VHF);
 - b. cellular phone; or
 - c. satellite phone.
4. When choosing a type of secure communications, the following shall be taken into consideration:
 - a. cellular signal coverage;
 - b. transportation area;
 - c. base capabilities;
 - d. antenna coverage; and
 - e. frequency of transportation.
5. Prior to, and immediately after leaving the originating location, the marijuana establishment agents shall use the secure form of communication to contact the originating location to test communications and GPS operability.
6. If communications or the GPS system fail while on route, the marijuana establishment agents transporting marijuana products must return to the originating location until the communication system or GPS system is operational.
7. The marijuana establishment agents transporting marijuana products shall contact the originating location when stopping at and leaving any scheduled location, and regularly throughout the trip, at least every 30 minutes.
8. The originating location must have a marijuana establishment agent

assigned to monitoring the GPS unit and secure form of communication, who must log all official communications with marijuana establishment agents transporting marijuana products.

(i) Manifests.

1. A manifest shall be filled out in triplicate, with the original manifest remaining with the originating Marijuana Establishment, a second copy provide to the destination Marijuana Establishment upon arrival, and a copy to be kept with the licensed marijuana establishment agent during transportation and returned to the Marijuana Establishment or Marijuana Transporter upon completion of the transportation.

2. Prior to transport, the manifest shall be securely transmitted to the destination Marijuana Establishment by facsimile or email.

3. Upon arrival at the destination Marijuana Establishment, a marijuana establishment agent at the destination Marijuana Establishment shall compare the manifest produced by the agents who transported the marijuana products to the copy transmitted by facsimile or email. This manifest must, at a minimum, include;

o. the originating Marijuana Establishment name, address, and registration number;

p. the names and registration numbers of the agents who transported the marijuana products;

q. the name and registration number of the marijuana establishment agent who prepared the manifest;

r. the destination Marijuana Establishment name, address, and registration number;

s. a description of the marijuana products being transported, including the weight and form or type of product;

t. the mileage of the transporting vehicle at departure from originating Marijuana Establishment and mileage upon arrival at destination Marijuana Establishment, as well as mileage upon return to originating Marijuana Establishment;

u. the date and time of departure from originating Marijuana Establishment and arrival at destination Marijuana Establishment for each transportation;

i. a signature line for the marijuana establishment agent who receives the marijuana products;

r. the weight and inventory before departure and upon receipt;

s. the date and time that the transported products were re-weighed and re-inventoried;

t. the name of the marijuana establishment agent at the destination Marijuana Establishment who re-weighed and re-inventoried products; and

u. the vehicle make, model, and license plate number.

4. The manifest shall be maintained within the vehicle during the entire transportation process, until the delivery is completed.

5. A Marijuana Establishment shall retain all transportation manifests for no less than one year and make them available to the Commission upon request.

(j) Requirements for Agents.

1. Each employee or agent transporting or otherwise handling marijuana products for a Marijuana Transporter must 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 the Marijuana Transporter prior to transporting or otherwise handling marijuana products.

2. A marijuana establishment agent shall carry his or her registration card at all times when transporting marijuana products, and shall produce his or her registration card to the Commission or law enforcement officials upon request.

(k) Marijuana Transporters shall use best management practices to reduce energy and water usage, engage in energy conservation and mitigate other environmental impacts.

(6) Access to the Commission, Emergency Responders and Law Enforcement.

(a) The following individuals shall have access to a Marijuana Establishment or Marijuana Establishment transportation vehicle:

1. Representatives of the Commission in the course of responsibilities authorized by St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000;
2. Representatives of other state agencies of the Commonwealth; and
3. Emergency responders in the course of responding to an emergency.

(b) 935 CMR 500.000 shall not be construed to prohibit access to authorized law enforcement personnel or local public health, inspectional services, or other permit-granting agents acting within their lawful jurisdiction.

(7) Energy Efficiency and Conservation. A marijuana establishment must demonstrate consideration of the following factors as part of its operating plan and application for licensure:

- (a) Identification of potential energy use reduction opportunities (such as natural lighting and energy efficiency measures), and a plan for implementation of such opportunities;
- (b) Consideration of opportunities for renewable energy generation, including, where applicable, submission of building plans showing where energy generators could be placed on the site, and an explanation of why the identified opportunities were not pursued, if applicable;
- (c) Strategies to reduce electric demand (such as lighting schedules, active load

Odor Control/Air Purification

One must constantly be conscious of the presence of mold spores within the facility in order to ensure the safety of both the employees and those who depend on product. Proper air purification is necessary to remove mold spores and strong odors from the air. Eddie's Flowers, Inc. will use a commercial air purification system. It is critical to choose one that can reduce VOCs/Vocarbs (Volitile Orgornic Compounds), and has a carbon filter or another equivalent filtration medium to reduce VOCs. Ours is triple tier.

There are two primary reasons that marijuana establishments need air purification systems. The first is simple grow/show room odor control, as the odor of a large number of cannabis plants, or loose, unsealed flower, together can become overpowering for those working in a establishment environment when left unchecked. The second, and even more important reason, is that grow rooms and marijuana establishments not equipped with air purifiers are likely to develop mold or mildew problems, which can spoil entire crops, and ruin product. Given these applications, an air purifier must be able to remove both odors and the tiny spores that spawn mold and mildew on the plants.

The odors will mainly result from marijuana flower exposed to the air. This will require use of the system on a continuous basis. The carbon filter will be changed as required by the unit manufacturer. The air will be periodically tested to detect mold and other contaminants at least once per week.

SPECIFIC ODOR CONTROL PLAN

7. **Each room in the facility will be fitted with activated carbon filters** sized for optimum performance according to manufacturing specifications. Using these filters is the industry standard of approved control when utilized in a sealed environment like we have in our facility. They use fans to pull air through metal casing packed with small pieces of activated carbon. Odor and contaminants are trapped in tiny pores across each piece of carbon leaving the air scrubbed clean.
8. **Each room will be fitted with an air neutralizer** designed for use in the NASA space program. This neutralizes negatively charged ions present in the air. This makes them attracted to particles such as odor bacteria, fungus, and other contaminants, and neutralizes them on contact. This effect also sanitizes every surface cracks and crevice in a room in which they are installed. This on its own cancels out odor, and by neutralizing bacteria and fungus, is preventative control against mold, powdery mildew, and plant diseases. The extra sterilization also helps lab environments necessary for tissue culture and cloning.
9. **A 5 tier filtration system** will also be mounted in each room. The air flows through an activated carbon prefilter that filters out lint and large particles. The second filter is a heap filter that filters out particles down to .3 micron. The third is two UVC ultraviolet filters that kill all mold, bacteria, fungus, and allergens. That works with the fourth, a

Photocatalytic Oxidation Filter(POF). The organic matter killed by the UVC (mold, bacteria, fungus, viruses, allergens) is transformed by the photocatalytic oxidation filter by a chemical reaction into carbon dioxide and water. The last filter is a potassium permanganate filter that filters any remaining gasses or traces of odor causing compounds from the air. This filter also is an amazing preventative measure against mold or powdery mildew contamination in the gardens and product.

4. Our Cultivation building exterior is sealed with an airlock entry, as well as our separate cultivation wing to keep in odor, and keep out pests, and any diseases or contamination. Each airlock contains an air shower that blows off any microscopic pests, mold or fungus that might travel in on the clothes of employees or float in the air. The second airlock in the cultivation room leads into a locker room where employees shower and change into company uniforms/protective this further insures that no contaminants, pests, or disease hitch a ride into our gardens. Each room inside the cultivation facility is also sealed with air curtains, a small air shower usually installed over doorways. This keeps air from either side from crossing each threshold and is an extra measure against contamination of any kind getting in or out.

It goes without saying that our above odor plan and three layers of sealed facility is also prevention against insect, powdery mildew, and mold infestation. In the unlikely event that any contamination happens in our facility, pest or otherwise, any pesticides or fungicides applied will be in compliance with M.G.L.c 132B, and regulations in 333 CMR 2.00 through CMR 14.00.

500.300: Inspections and Compliance

(11) The Commission or its agents may inspect a Marijuana Establishment and affiliated vehicles at any time without prior notice in order to determine the Marijuana Establishment's compliance with St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000. All areas of a Marijuana Establishment, all marijuana establishment agents and activities, and all records are subject to such inspection. Acceptance of a license by a Marijuana Establishment constitutes consent for such inspection.

(12) Eddie's Flowers, Inc. shall immediately upon request make available to the Commission all information that maybe relevant to a Commission inspection, or an investigation of any incident or complaint.

(13) Eddie's Flowers, Inc. shall make all reasonable efforts to facilitate the Commission's inspection, or investigation of any incident or complaint, including the taking of samples, photographs, video or other recordings by the Commission or its agents, and to facilitate the Commission's interviews of marijuana establishment agents.

(14) An inspection or other investigation may be made prior to the issuance of a license or renewal of registration. Additional inspections may be made whenever the Commission deems it necessary for the enforcement of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000.

(15) During an inspection, the Commission may direct a Marijuana Establishment to test marijuana for contaminants as specified by the Commission, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides not approved for use on marijuana by the Massachusetts Department of Agricultural Resources.

500.310: Deficiency Statements

After an inspection in which a violation of St. 2016, c. 334, as amended by St. 2017, c. 55 or 935 CMR 500.000, is observed or a violation is otherwise determined to have occurred, the Commission shall issue a deficiency statement citing every violation identified, a copy of which shall be left with or sent to the Marijuana Establishment.

500.320: Plans of Correction

(9) A Marijuana Establishment shall submit to the Commission a written plan of correction for any violations cited in the deficiency statement issued pursuant to 935 CMR 500.310 within ten business days after receipt of the statement.

(10) Every plan shall state, with respect to each deficiency, the specific corrective step(s) to be taken, a timetable for such steps, and the date by which compliance with 935 CMR 500.000 will be achieved. The timetable and the compliance dates shall be consistent with achievement of compliance in the most expeditious manner possible.

(11) The Commission shall review the plan of correction for compliance with the requirements of St. 2016, c. 334, as amended by St. 2017, c. 55 and 935 CMR 500.000, and shall notify the Marijuana Establishment of either the acceptance or rejection of the plan.

(12) An unacceptable plan must be amended and resubmitted within five business days after receipt of such notice.

500.140: Additional Operational procedures for Retail Sale

(1) Limitation on Sales. In accordance with M.G.L. c. 94G, § 7, a Marijuana Retailer may not sell more than one ounce of marijuana or five grams of marijuana

concentrate to a consumer per transaction.

(2) Unauthorized Sales and Right to Refuse Sales.

- (a) Eddie's Flowers, Inc. agents shall refuse to sell marijuana to any consumer who is unable to produce valid proof of identification.
- (b) Eddie's Flowers, Inc. agents may refuse to sell marijuana products to a consumer if, in the opinion of the marijuana establishment agent based on the information available to the agent at that time, the consumer or the public would be placed at risk.
- (c) Eddie's Flowers, Inc. Agents shall not sell to an individual more than one ounce of marijuana or five grams of marijuana concentrate per transaction.
- (d) Eddie's Flowers, Inc. and its agents is prohibited from selling marijuana products containing nicotine.
- (e) Eddie's Flowers, Inc. is prohibited from selling marijuana products containing alcohol, if sales of such alcohol would require licensure pursuant to M.G.L. c. 138.

(3) Recording Sales.

- (a) Eddie's Flowers, Inc. is using METRC.
- (b) Eddie's Flowers, Inc. is prohibited from utilizing software or other methods to manipulate or alter sales data.
- (c) Eddie's Flowers, Inc. shall 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. A Marijuana Retailer shall maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If a retailer determines that software has been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data:
 - 1. it shall immediately disclose the information to the Commission;
 - 2. it shall cooperate with the Commission in any investigation regarding manipulation or alteration of sales data; and
 - 3. take such other action directed by the Commission to comply with 935 CMR 500.105.
- (d) Eddie's Flowers, Inc. shall comply with 830 CMR 62C.25.1: *Record Retention* and DOR Directive 16-1 regarding recordkeeping requirements.
- (e) A retailer shall adopt separate accounting practices at the point-of-sale for marijuana and marijuana product sales, and non-marijuana sales.

(4) Consumer Education. A Marijuana Retailer shall make available educational materials about marijuana products to consumers. A retailer must have an adequate supply of current educational material available for distribution. Educational materials must be available in commonly spoken languages designated by the Commission, which will include, but not be limited to appropriate materials for the visually- and hearing-impaired. Such materials shall be made available for inspection by the Commission upon request. The Commission will establish fines or other civil penalties for a

Marijuana Establishment's failure to provide these materials. The educational material must include at least the following:

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

(23) Testing. No marijuana product, including marijuana, may be sold by Eddie's Flowers, Inc., 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. The product must be deemed to comply with the standards required under 935 CMR 500.160.

Timeline

Eddie's Flowers, Inc. is negotiating relationships with several cultivation and manufacturing establishments to obtain product at wholesale prices, until their facilities are constructed and licensed. We will be operational within 60-90 days of final approval by the state and the local licensing authorities.

Equity

Eddie's Flowers, Inc. is dedicated to addressing the disparate impact that cannabis enforcement has had on the community's minority, and less economically fortunate residents. Eddie's Flowers, Inc. shall focus heavily on hiring from those communities and will commit resources to training them in all aspects of the legal cannabis industry.

Eddie's Flowers, Inc. will not just educate, but empower the local community and our neighbors.

Employment

Eddie's Flowers, Inc.'s shareholders currently employ disabled persons, and have always ensured the proper framework was in place to promote equity among minorities, women, veterans, people with disabilities, and people of all gender identities and sexual orientation, in the operation of our existing businesses.

Community Outreach

Meeting January 25, 2022 5:30 P.m. on zoom