



**Local History.
Local Ownership.
Local First.**

June 8th
2020



Town of Natick

ADULT USE MARIJUANA ESTABLISHMENT RFI RESPONSE

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Cover Letter

James Freas, Director
Department of Community & Economic Development
13 East Central Street
Natick, MA 01760

June 8, 2020

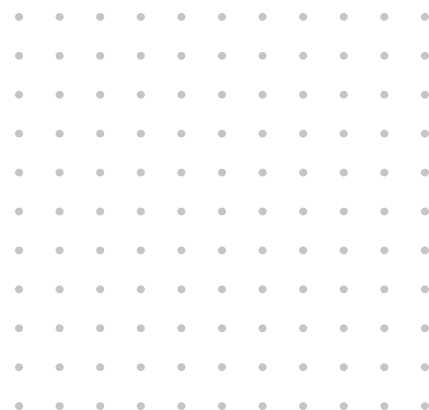
Dear Director Freas,

With over 60 years of history in the Town of Natick, the owners of Redi dispensaries, Cypress Tree Management Natick, Inc., (“CTM”) are pleased to submit this Request for Information (RFI) response for an Adult Use Marijuana Establishment in support of our proposed retail cannabis facility located in the Cloverleaf Mall at 321 Speen Street. CTM is our license applicant entity for both Natick and the Massachusetts Cannabis Control Commission (“CCC”), while Redi (pronounced like “ready”) is our proposed retail name.

In just a few short years of adult-use cannabis in Massachusetts, residents have seen large, multi-state, publicly traded companies start to take over our local marketplace. Unfortunately, we are also seeing well-funded cannabis conglomerates tying up licenses and blocking local ownership in the communities we consider to be our home.

CTM represents a different path. The cornerstone of our company is community. We have always placed a high value on maintaining our local roots through a long and productive relationship with the Town of Natick that spans over a half-century. Our leadership team was born and raised in this area and Natick’s commercial businesses are woven into our daily lives. One of our founding partners, Todd Finard, owns and operates the 9/27 Shopping Plaza and is a well-established partner in Natick, serving this community along with his family throughout his life.

CTM has the experience and ability to finance, construct, and operate a first-rate retail establishment. Natick can take pride in selecting a locally owned company that will operate in an area that is best suited for adult-use cannabis. Redi, our proposed facility in the Cloverleaf Mall, was chosen as an ideal location within an existing shopping center to minimize any potential disruption to the surrounding area, easily accommodate traffic and parking, and is purposely designed to be modest, inconspicuous, and secure. With 645 available parking spaces, cameras monitoring the property 24/7, and a retail staff led by the talented Lisa Burke who, for the last 5 years, has been responsible for the operations at New England’s busiest co-located recreational and medical marijuana dispensary, we are confident in our ability to deliver an exceptional retail experience at Redi.



We judge the effectiveness of our business by how well we serve our community partners. Our adult-use application represents our strong commitment to who we are at CTM. Our company's history in the Town of Natick is a particular point of pride for our team, but we are also proud of the work in Massachusetts as leaders in the cannabis industry. CTM was the first company in the Commonwealth to propose selling cannabis pre-roll items in packages of three (3) or more in order to curb youth access and we are making that same strong public health commitment at Redi in Natick. We are also focused on creating local job opportunities and we are unwavering in our dedication to hire locally first.

Our founding partners have prioritized the need for transparency as well as personally serving Natick as part of the retail team. We have included detailed summaries and descriptions of each of the sections contained in this RFI - including in-depth and specifically identified submissions for the Cannabis Control Commission for even greater transparency - in order for the review committee, as well as the general public, to get a full understanding of our company's policies, procedures, and dedication to best-in-class community partnerships. Moreover, all of our founding partners still live within just a few miles of Natick and we have dedicated ourselves to responding to the needs of residents, neighbors, and town's leadership 24 hours a day, 7 days a week.

No application for a business establishment in Natick would be complete without a strong recognition that our economy, and perhaps even our society, have been profoundly changed by the recent COVID-19 crisis. The cannabis market is not exempt from this economic downturn and recent data show that national cannabis companies have been hit hard by this crisis. However, our local business is as strong as ever. Our company's strength and longevity are grounded in a range of diversified interests and, unlike national cannabis companies, far less dependent on cannabis alone.

Throughout this crisis, we have not only weathered this economic storm, but been more productive as a result. For example, Todd Finard worked with the ownership at Stop & Shop at the 9/27 Plaza to formulate the idea for "Seniors Only" shopping hours, which ultimately led to Stop & Shop introducing these hours from 7:00 AM- 8:30 AM each day throughout all of their stores. CTM's founding partners share a deep commitment to evolving our business operations to serve all of our guests, while also maintaining a strong balance sheet to help create these innovative solutions well into the future.

We fundamentally believe that adult-use retail in Natick should be safe, ideally located, and serve to benefit this community for years come. Our goal is to continue to improve the dimensions of our long partnership with the Town of Natick and we welcome the hard work and diligent service it will require to further deepen our roots in this community.

Thank you for the opportunity to submit this proposal.

Sincerely,



Victor Chiang, CEO
Cypress Tree Management Natick

Proof of Business Registration

CTM is a proud local business founded on the principle that communities come first.

We look forward to working closely with the Town of Natick to create the highest quality and safest retail experience in the cannabis industry. Our business doesn't just serve our guests; we serve our neighbors and the residents of this community with the same level of care and concern for their health and well-being.

As more opportunities to grow our relationship with the Town of Natick develop, CTM is committed to working with community leaders, residents, and local organizations to tightly align our values and fully participate in future efforts that serve and complement the community.

We offer the following document as certification of our business and our purposeful commitment to the Town of Natick as a dedicated partner with a long history of service to the town and its residents.

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF INCORPORATION OF "CYPRESS TREE MANAGEMENT NATICK, INC.", FILED IN THIS OFFICE ON THE THIRTEENTH DAY OF APRIL, A.D. 2020, AT 12:49 O`CLOCK P.M.

A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE KENT COUNTY RECORDER OF DEEDS.



Jeffrey W. Bullock, Secretary of State

7933687 8100
SR# 20202766563

Authentication: 202762228
Date: 04-14-20

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

CERTIFICATE OF INCORPORATION

OF

CYPRESS TREE MANAGEMENT NATICK, INC.

FIRST: The name of the Corporation is: Cypress Tree Management Natick, Inc.

SECOND: The address of its registered office in the State of Delaware is 850 New Burton Road, Suite 201, in the City of Dover, County of Kent, 19904. The name of its registered agent at such address is COGENCY GLOBAL, INC.

THIRD: The nature of the business or purposes to be conducted or promoted by the Corporation is as follows:

To engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware.

FOURTH: The total number of shares of all classes of stock which the Corporation shall have authority to issue is One Thousand (1,000) shares of Common Stock, \$0.001 par value per share ("Common Stock").

1. Voting. The holders of the Common Stock are entitled to one vote for each share held at all meetings of stockholders (and written actions in lieu of meetings). There shall be no cumulative voting.

The number of authorized shares of Common Stock may be increased or decreased (but not below the number of shares thereof then outstanding) by the affirmative vote of the holders of a majority of the stock of the Corporation entitled to vote, irrespective of the provisions of Section 242(b)(2) of the General Corporation Law of Delaware.

2. Dividends. Dividends may be declared and paid on the Common Stock from funds lawfully available therefor as and when determined by the Board of Directors.

3. Liquidation. Upon the dissolution or liquidation of the Corporation, whether voluntary or involuntary, holders of Common Stock will be entitled to receive all assets of the Corporation available for distribution to its stockholders.

FIFTH: The name and mailing address of the sole incorporator is as follows:

Name

Mailing Address

Victor Chiang

419 Boylston Street, Suite 300
Boston, MA 02116

SIXTH: In furtherance of and not in limitation of powers conferred by statute, it is further provided:

1. Election of directors need not be by written ballot.
2. The Board of Directors is expressly authorized to adopt, amend or repeal the Bylaws of the Corporation.

SEVENTH: Except to the extent that the General Corporation Law of Delaware prohibits the elimination or limitation of liability of directors for breaches of fiduciary duty, no director of the Corporation shall be personally liable to the Corporation or its stockholders for monetary damages for any breach of fiduciary duty as a director, notwithstanding any provision of law imposing such liability. No amendment to or repeal of this provision shall apply to or have any effect on the liability or alleged liability of any director of the Corporation for or with respect to any acts or omissions of such director occurring prior to such amendment.

EIGHTH: The Corporation shall, to the fullest extent permitted by Section 145 of the General Corporation Law of Delaware, as the same may be amended from time to time, indemnify each person who was or is a party or is threatened to be made a party to any threatened, pending or completed action, suit or proceeding, whether civil, criminal, administrative or investigative, by reason of the fact that he is or was, or has agreed to become, a director or officer of the Corporation, or is or was serving, or has agreed to serve, at the request of the Corporation, as a director, officer or trustee of, or in a similar capacity with, another corporation, partnership, joint venture, trust or other enterprise, including any employee benefit plan (all such persons being referred to hereafter as an "Indemnitee"), or by reason of any action alleged to have been taken or omitted in such capacity, against all expenses (including attorneys' fees), judgments, fines and amounts paid in settlement actually and reasonably incurred by or on behalf of an Indemnitee in connection with such action, suit or proceeding and any appeal therefrom.

As a condition precedent to his right to be indemnified, the Indemnitee must notify the Corporation in writing as soon as practicable of any action, suit, proceeding or investigation for which indemnity will or could be sought. With respect to any action, suit, proceeding or investigation of which the Corporation is so notified, the Corporation will be entitled to participate therein at its own expense and/or to assume the defense thereof at its own expense, with legal counsel reasonably acceptable to the Indemnitee.

In the event that the Corporation does not assume the defense of any action, suit, proceeding or investigation of which the Corporation receives notice under this Article, the Corporation shall pay in advance of the final disposition of such matter any expenses (including attorneys' fees) incurred by an Indemnitee in defending a civil or criminal action, suit, proceeding or investigation or any appeal therefrom; provided, however, that the payment of such expenses incurred by an Indemnitee in advance of the final disposition of such matter shall be made only upon receipt of an undertaking by or on behalf of the Indemnitee to repay all amounts so advanced in the event that it shall ultimately be determined that the Indemnitee is not entitled to be indemnified by the Corporation as authorized in this Article, which undertaking shall be accepted without reference to the financial ability of the Indemnitee to make such repayment; and further provided that no such advancement of expenses shall be made if it is

{W11889450.1}

determined that (i) the Indemnatee did not act in good faith and in a manner he reasonably believed to be in, or not opposed to, the best interests of the Corporation, or (ii) with respect to any criminal action or proceeding, the Indemnatee had reasonable cause to believe his conduct was unlawful.

The Corporation shall not indemnify an Indemnatee seeking indemnification in connection with a proceeding (or part thereof) initiated by such Indemnatee unless the initiation thereof was approved by the Board of Directors of the Corporation. In addition, the Corporation shall not indemnify an Indemnatee to the extent such Indemnatee is reimbursed from the proceeds of insurance, and in the event the Corporation makes any indemnification payments to an Indemnatee and such Indemnatee is subsequently reimbursed from the proceeds of insurance, such Indemnatee shall promptly refund such indemnification payments to the Corporation to the extent of such insurance reimbursement.

All determinations hereunder as to the entitlement of an Indemnatee to indemnification or advancement of expenses shall be made in each instance by (a) a majority vote of the directors of the Corporation consisting of persons who are not at that time parties to the action, suit or proceeding in question ("disinterested directors"), whether or not a quorum, (b) a majority vote of a quorum of the outstanding shares of stock of all classes entitled to vote for directors, voting as a single class, which quorum shall consist of stockholders who are not at that time parties to the action, suit or proceeding in question, (c) independent legal counsel (who may, to the extent permitted by law, be the Corporation's regular legal counsel), or (d) a court of competent jurisdiction.

The indemnification rights provided in this Article (i) shall not be deemed exclusive of any other rights to which an Indemnatee may be entitled under any law, agreement or vote of stockholders or disinterested directors or otherwise, and (ii) shall inure to the benefit of the heirs, executors and administrators of the Indemnitees. The Corporation may, to the extent authorized from time to time by its Board of Directors, grant indemnification rights to other employees or agents of the Corporation or other persons serving the Corporation and such rights may be equivalent to, or greater or less than, those set forth in this Article.

NINTH: The Corporation reserves the right to amend, alter, change or repeal any provision contained in this Certificate of Incorporation, in the manner now or hereafter prescribed by statute and this Certificate of Incorporation, and all rights conferred upon stockholders herein are granted subject to this reservation.

EXECUTED by the undersigned on this 31st day of March, 2020.

/s/ Victor Chiang

Victor Chiang

Incorporator

**F
FPC**

The Commonwealth of Massachusetts

William Francis Galvin
Secretary of the Commonwealth
One Ashburton Place, Boston, Massachusetts 02108-1512

FORM MUST BE TYPED

Foreign Corporation

FORM MUST BE TYPED

Certificate of Registration

(General Laws, Chapter 156D, Section 15.03; 950 CMR 113.48)

- (1) Exact name of the corporation, including any words or abbreviations indicating incorporation:

Cypress Tree Management Natick, Inc.

- (2) Name under which the corporation will transact business in the commonwealth that satisfies the requirements of G.L. Chapter 156D, Section 15.06:

Cypress Tree Management Natick, Inc.

If applicable, please attach:

- an agreement to refrain from use of the unavailable name in the commonwealth; and
- a copy of the doing business certificate filed in the city or town where it maintains its registered office; and
- a copy of the resolution of the corporation's board of directors, certified by its secretary, the name under which the corporation will transact business in the commonwealth pursuant to 950 CMR 113.50(4).

- (3) Jurisdiction of incorporation: Delaware

Date of incorporation: April 13, 2020 Duration if not perpetual: _____
(month, day, year)

- (4) Street address of principal office: 419 Boylston Street, Ste 300, Boston, MA 02116

(number, street, city or town, state, zip code)

- (5) Street address of registered office in the commonwealth: 100 Summer Street, 22nd Floor, Boston, MA 02110

(number, street, city or town, state, zip code)

Name of registered agent in the commonwealth at the above address: Scott E. Pueschel, Esq.

I, Scott E. Pueschel, Esq.

registered agent of the above corporation consent to my appointment as registered agent pursuant to G. L. Chapter 156D, Section 5.02.*

* Or attach registered agent's consent hereto.

(6) Fiscal year end: December 31
(month, day)

(7) Brief description of the corporation's activities to be conducted in the commonwealth:

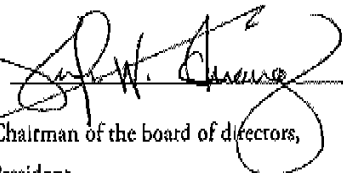
Investment in privately held companies

(8) Names and business addresses of its current officers and directors:

NAME	BUSINESS ADDRESS
President: Victor Chiang	419 Boylston Street, Ste 300, Boston, MA 02116
Vice-president:	
Treasurer: Victor Chiang	419 Boylston Street, Ste 300, Boston, MA 02116
Secretary: Victor Chiang	419 Boylston Street, Ste 300, Boston, MA 02116
Assistant secretary:	
Director(s): Victor Chiang	419 Boylston Street, Ste 300, Boston, MA 02116

Attach certificate of legal existence or a certificate of good standing issued by an officer or agency properly authorized in the jurisdiction of organization. If the certificate is in a foreign language, a translation thereof under oath of the translator shall be attached.

This certificate is effective at the time and on the date approved by the Division, unless a later effective date not more than 90 days from the date of filing is specified: _____

Signed by:  _____
(signature of authorized individual)

☒ Chairman of the board of directors,
☒ President,
☐ Other officer,
☐ Court-appointed fiduciary,

on this 17th day of April, 2020

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "CYPRESS TREE MANAGEMENT NATICK, INC." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE SEVENTEENTH DAY OF APRIL, A.D. 2020.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "CYPRESS TREE MANAGEMENT NATICK, INC." WAS INCORPORATED ON THE THIRTEENTH DAY OF APRIL, A.D. 2020.

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



7933687 8300

SR# 20202946766

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

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

Authentication: 202787921

Date: 04-17-20

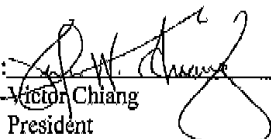
CONSENT TO USE OF SIMILAR NAME

TO: Secretary of Commonwealth of Massachusetts
McCormack Building
One Ashburton Place, 17th Floor
Boston, MA 02108

The undersigned, **Cypress Tree Management, Inc.**, a Massachusetts corporation, hereby consents to the filing by Cypress Tree Management Natick, Inc. of a Foreign Corporation Certificate of Registration of "Cypress Tree Management Natick, Inc." with the Secretary of the Commonwealth of Massachusetts.

Dated: April 21, 2020

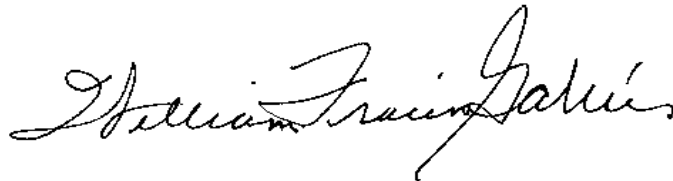
Cypress Tree Management, Inc.

By: 
Victor Chiang
President

THE COMMONWEALTH OF MASSACHUSETTS

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

April 22, 2020 11:19 AM

A handwritten signature in black ink, reading "William Francis Galvin". The signature is written in a cursive, flowing style with a large initial 'W'.

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth

Certificate of Good Standing

We believe that our company’s reputation and deep local history are what set us apart in the Town of Natick and in the Massachusetts cannabis industry. CTM is a locally owned and operated business and our mission in every community in the Commonwealth is to develop a close working relationship with residents, neighbors, and local leaders that creates an outstanding public partnership for years to come.

The following document reflects our conscious, daily efforts as a reliable business partner to do our part in maintaining a healthy balance sheet and remaining steadfast in our obligations to the Commonwealth of Massachusetts – a place that our founding partners have called home throughout their lives.

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "CYPRESS TREE MANAGEMENT NATICK, INC." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTY-SEVENTH DAY OF APRIL, A.D. 2020.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "CYPRESS TREE MANAGEMENT NATICK, INC." WAS INCORPORATED ON THE THIRTEENTH DAY OF APRIL, A.D. 2020.

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



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

7933687 8300

SR# 20203166783

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

Authentication: 202830823

Date: 04-27-20

Who We Are

Documentation of all Persons or Entities having Direct or Indirect Control of the Proposed Marijuana Establishment

CTM is a locally owned and operated company proudly focused on our local roots and investing in the communities that have made us who we are today.

Our founders are natives of neighboring Weston and nearby Brookline, Massachusetts, and their history with the Town of Natick stretches back nearly 60 years. All three partners have maintained thriving businesses and possess the skill sets that every community looks for in a long and successful relationship with a retail partner.

Todd Finard is one of the top placemaking and hospitality developers in New England. Victor Chiang is a successful financial entrepreneur who has worked at the highest levels on Wall Street. Eric Liebman is a driving force behind the movement of healthy fast food restaurants. Taken together, our backgrounds create an extraordinary team with the vision, talent, and resources to support a project of this caliber.

Our entire founding team is dedicated to being responsive to the needs of Natick and its residents, and we believe strongly in our ability to weave our business, once again, into the fabric of this community.

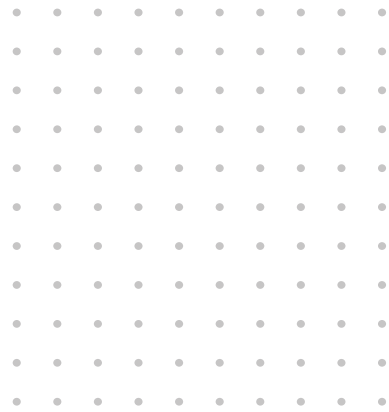


VICTOR CHIANG

(Board of Directors and CEO)

Born & Raised: Weston, MA

Hometown: Wellesley, MA



Victor began his career by spending 12 years at Andersen Consulting/Accenture's Boston office where he was focused on management and IT consulting in the Financial Services practice. During his tenure Victor's major clients included Fidelity Investments, John Hancock, Royal Bank of Canada, American Express, Ameriprise, and Barclay's Capital. Victor then spent 11 years as a co-founder, Chief Operating Officer, Chief Compliance Officer and Investment Committee Member of Balter Capital Management, a Boston based hedge fund boutique that had several hedge funds and mutual fund products, and a hedge fund advisory service, with peak assets of \$1.4B. As the Chief Operating Officer, he was responsible for the firm's product manufacturing, managing all third-party vendors, investor relations, and managing all of the non-fund raising and investment operations and HR for the firm. Victor held one of the three investment committee votes with the only voting right to unilaterally reject an investment for operational risks. Victor left BCM in 2016 to co-found Cypress Tree Management. Victor has been its full-time CEO since then, and has fully immersed himself in the MA cannabis market. Victor is a board member of the MA Cannabis Business Association, an organization dedicated to the responsible growth of the cannabis industry in Massachusetts. Outside of work, Victor volunteers with the Dana-Farber where he co-chairs an annual golf tournament and has helped raised over \$1.3MM in total giving. Victor grew up in Weston, MA and currently lives in Wellesley, MA with his family.

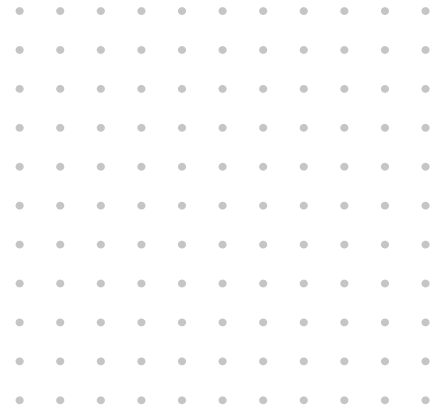


TODD FINANRD

(Board of Directors)

Born & Raised: Weston, MA

Hometown: Weston, MA



Todd is Chief Executive Officer of Finard Properties. In the 25 years that Todd has been involved in the world of real estate development, he has become an active leader in the communities in which the company is present. Most recently, Todd worked in his capacity as a Board Member at Hebrew SeniorLife to support the COVID-19 Senior Response Fund, which has raised over \$1,000,000 since the pandemic began. Hebrew SeniorLife is the largest geriatric care provider in New England and a Harvard Medical School affiliate with seven senior care centers throughout MA, and is a charity Todd is passionate about having served as a past Chairman of the Board. Separately, as a founder of the Combined Jewish Philanthropies Next Generation Housing Corporation and worked with several close friends to create a housing platform for adults with disabilities in the Boston area. Currently, Todd serves as the Chairman of the Board of Advisors for the School at the Museum of Fine Arts at Tufts University, his alma mater. Additionally, Todd is the Chairman of the PBCC Scholars Foundation, a 501C3 which makes educational grants and supports local community partners in the Weston area. Professionally, Todd has worked on the development of shopping centers, hotels and office properties in Massachusetts, Maine, Rhode Island, Vermont and Tennessee. Todd grew up in, and continues to reside in Weston, MA with his family.



ERIC LIEBMAN

(Board of Directors)

Born & Raised: Brookline, MA

Hometown: Somerville, MA

Eric has spent over 20 years working in real estate both in the Boston area and New York. Eric spent 8 years working in manufacturing and retail for a family run business with offices in Boston, Hong Kong and China, where their customers were major big-box retailers. Prior to that, Eric was involved in the initial launch of the Boloco restaurant group as an equity holder and instrumental in opening the first store in Fenway (steps from our proposed Fenway retail site). Eric grew up in Brookline, MA and currently lives in Somerville, MA.

Amounts and Sources of Capital Resources

Summary

Our founding partners have committed their own personal capital to open a facility in Natick, just as they have with licensing CTM's Newton dispensary. CTM has established a single source of capital to draw from during the permitting, licensing, construction, hiring, and training phases of our Natick location prior to opening our doors to guests. CTM has included a bank statement from Finard Holdings, LLC, as a reflection of the personal funds that will be committed to the buildout and initial opening of the Cloverleaf Mall location. These funds are also available for the purchase of needed liability insurance such as Worker's Compensation, as well as professional and commercial insurance coverage.

The following document demonstrates the financial stability of our local company and ensures CTM's financial solvency throughout the construction, outfitting, and initial operations of our proposed retail establishment in Natick.

INVESTMENT REPORT
January 1, 2020 - January 31, 2020

[Redacted]

Envelope # BHZWTTBBBFPH

BOSTON PRIVATE
ONE FEDERAL ST 30TH FLOOR
BOSTON MA 02110

BOSTON PRIVATE
WEALTH ■ TRUST ■ PRIVATE BANKING

Brokerage FINARD HOLDINGS LLC (P)

► Account Number: [Redacted]

Your Account Value:

Change from Last Period:

[Redacted]

	This Period	Year-to-Date
Beginning Account Value	[Redacted]	[Redacted]
Subtractions	[Redacted]	[Redacted]
Change in Investment Value *	[Redacted]	[Redacted]
Ending Account Value **	[Redacted]	[Redacted]
Accrued Interest (AI)	[Redacted]	[Redacted]
Ending Account Value Incl. AI	[Redacted]	[Redacted]

* Reflects appreciation or depreciation of your holdings due to price changes, transactions from Other Activity In or Out and Multi-currency transactions, plus any distribution and income earned during the statement period.

** Excludes unpriced securities.

Your Client

FINARD HOLDINGS LLC (P)
419 BOYLSTON ST STE 300
BOSTON MA 02116-3335

Contact Your Advisor/Agent

Phone: (800) 422-6172
www.bostonprivate.com

Marijuana Establishment: Property Interest and Supporting Details

CTM's founders have been long-standing partners with the Town of Natick for over a half-century, and it is a privilege to present our proposed facility as an exceptional location for adult-use cannabis in Natick.

We believe that an adult-use cannabis facility in Natick must be able to easily accommodate traffic and parking, while offering the highest quality guest and community experience. The Cloverleaf Mall at 321 Speen Street offers an ideal location within an existing shopping center. We intend to minimize any potential disruption to the surrounding areas while providing a comfortable and secure experience for guests and neighbors.

Fundamentally, the exterior of our proposed facility is designed to be understated. Our team believes that adult-use cannabis facilities must not only be accessible, but the exterior features must also be muted, minimally obtrusive, and secure. In strict accordance with the Cannabis Control Commission's ("CCC") guidelines, as well as our own experience in developing retail facilities in the Town of Natick, we believe that our location offers a particularly unique opportunity to feature adult-use cannabis in a modest, inconspicuous setting that does not disrupt the normal flow of commerce in the area.

We are genuinely pleased to present the concept that we've developed for our facility to the Town of Natick, as well as to the residents, local organizations, and fellow businesses that we look forward to serving as an important and enduring partner in this community.

The following documentation includes exterior renderings, a suggested floor plan, as well as a binding letter of intent evidencing the legal authorization to use the premises at 321 Speen Street within the Cloverleaf Mall under a lease agreement between CTM and Elson Cloverleaf, LP.



PROPOSED DISPENSARY STORE

CLOVERLEAF MALL

321 SPEEN STREET, NATICK, MASSACHUSETTS 01760

ARCHITECT
HABEEB & ASSOCIATES
ARCHITECTS
150 LONGWATER DRIVE
NORWELL, MA 02061
100 GROVE STREET #304
WORCESTER, MA 01605
781.871.9804
habeebarch.com

OWNER
FINARD PROPERTIES, LLC
419 BOYLSTON STREET, SUITE 300
BOSTON, MA 02116

DRAFT

DRAWING LIST
GENERAL
G-001 TITLE SHEET
ARCHITECTURAL
A-101 DISPENSARY FLOOR PLAN





HABEEB & ASSOCIATES
ARCHITECTS

150 LONGWATER DR.
NORWELL, MA 02061
100 GROVE STREET #304
WORCESTER, MA 01605
781.871.9804
habeebarch.com

STAMP

CONSULTANT

PROPOSED DISPENSARY STORE

CLOVERLEAF MALL

321 SPEEN STREET NATICK, MA

REVISIONS	
MARK	DATE DESCRIPTION

PROJECT NO. 100336

DATE 04-20-2020

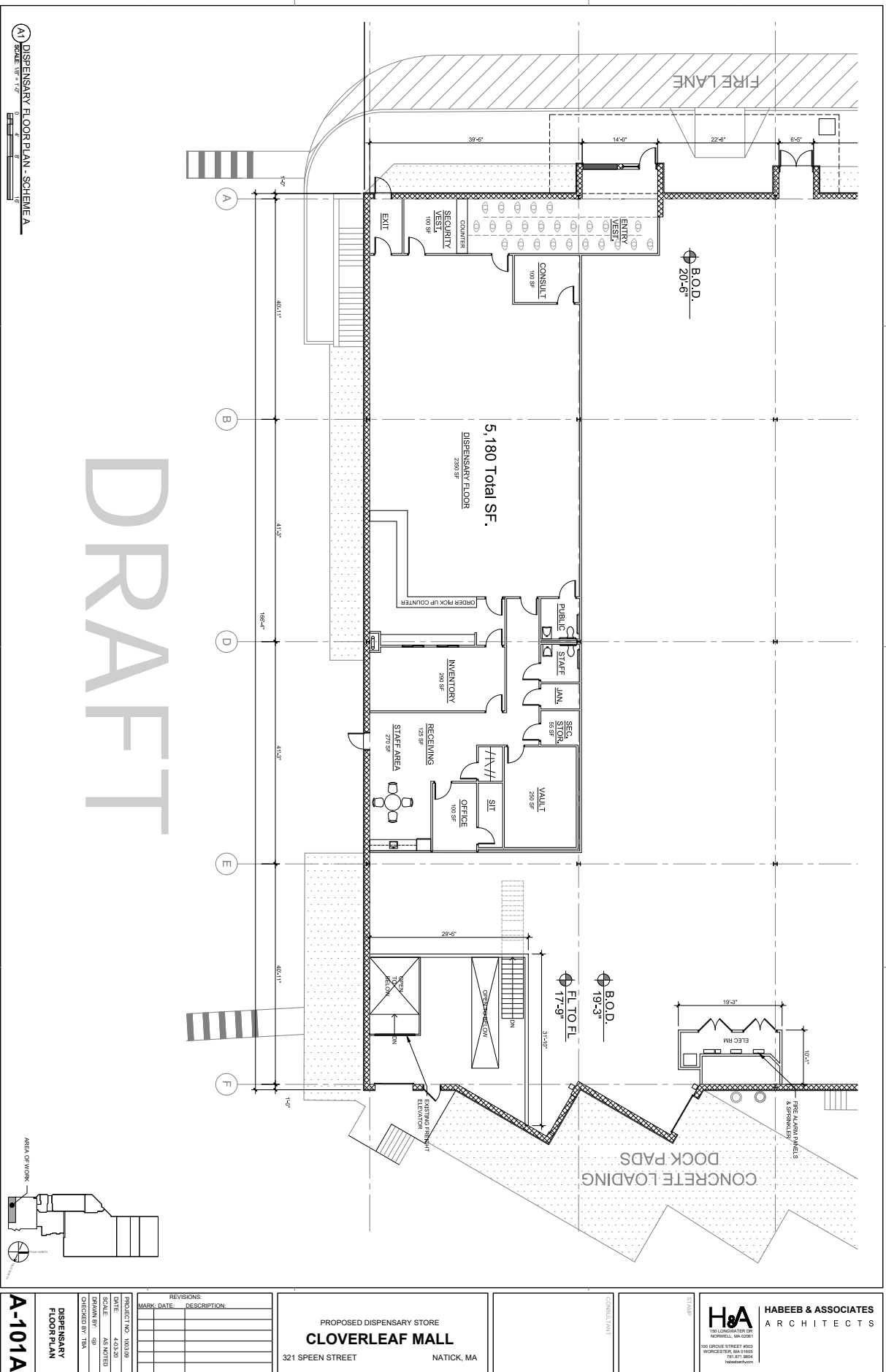
SCALE AS SHOWN

DRAWN BY: TBA

CHECKED BY: TBA

TITLE SHEET AND CODE SUMMARY

G-001



LEASE PROPOSAL

CLOVERLEAF MALL, NATICK, MA

April 13, 2020

The following is a proposal for a lease at Cloverleaf Center, 321 Speen St, Natick, MA, between the below-identified Landlord and Tenant.

<u>Landlord:</u>	Elson Cloverleaf LP
<u>Tenant:</u>	Cypress Tree Management Natick, Inc. or an affiliate
<u>Use:</u>	Licensed marijuana retailer as defined and regulated by MGL and CMR for the sale of marijuana/cannabis related products. Tenant will have the exclusive right to this use.
<u>Premises:</u>	Approximately 5,000 square feet at Cloverleaf Center as shown on the attached plan
<u>Term:</u>	10 years with 2 options of 5 years each
<u>Rent:</u>	Initial term: [REDACTED] First option period [REDACTED] Second option period [REDACTED]
<u>Operating Expenses and Real Estate Taxes:</u>	Rent will be gross, which is to say that the rent will include all common area operating costs and real estate taxes. If, however, the real estate taxes for the shopping center are increased over the FY 2020 level, Tenant will pay its pro rata share of the increase. Tenant will be responsible for paying the costs of utilities used in the Premises.
<u>Option Payments:</u>	\$10,000 per month, commencing on the due date for license applications established by the Town of Natick
<u>Lease Commencement Date :</u>	Upon Landlord's Delivery (as defined below)
<u>Rent Commencement Date:</u>	The latter of (i) 90 days following Landlord's Delivery, and (ii) Tenant's receipt of approval by the MA CCC to operate as a marijuana dispensary. If such CCC approval has not been obtained by March 1, 2021, either party can terminate.
<u>Security Deposit:</u>	\$40,000, payable upon Landlord's Delivery, to be held by Landlord and applied against the last month's rent under the Lease.
<u>Landlord's Delivery</u>	Landlord will deliver the Premises to Tenant demised off from the adjacent space, sprinkler system to code for unfinished space, utilities to the perimeter, an additional egress door on the east side of the Premises, and otherwise in as-is condition. Tenant

recognizes that the Premises lack, among other things, both hvac and bathrooms.

Transfer of Tenant's Business:

If Tenant transfers its business at any time from the date hereof through the date that is 24 months after the Rent Commencement Date, or at any time thereafter to a party with whom Tenant was negotiating during the aforesaid period, then Landlord shall be entitled to 50% of the total compensation to be received by Tenant on account of such transfer.

Signage:

Tenant will not be entitled to place its sign on the shopping center pylon or at any other location along Speen Street. All of Tenant's signage will be subject to prior approval by Landlord.

Repairs/Maintenance:

Landlord will repair and maintain the roof of the Premises and all exterior and structural elements of the Premises, as well as the common areas of the shopping center. Landlord will also repair and maintain any utility systems not located in the Premises or serving the Premises exclusively.

Tenant will be responsible for all other maintenance and repairs with respect to the Premises, including all utility systems exclusively serving the Premises, the façade and entrance to the Premises and all exterior glass.

Tenant's Buildout

Promptly following the Lease Commencement Date, Tenant will build out the Premises for the operation of Tenant's business. Tenant will submit its construction plans to Landlord for its reasonable approval prior to commencing construction.

Alterations:

Tenant may, from time to time during the term of the Lease, make interior, non-structural alterations to the Premises without Landlord's consent, so long as the value of the Premises is not impaired thereby.

Assignment and Sublet:

Allowed to another licensed marijuana dispensary, with Landlord's consent not to be unreasonably withheld or delayed, and subject to the above provisions relative to Transfer of Tenant's Business..

Termination:

Tenant may terminate the Lease upon 30 days notice if Tenant is unable to secure permission from the Town of Natick to operate its business in the Premises.

Brokers:

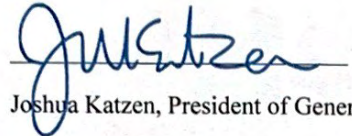
The parties will warrant and represent that no brokers other than Ben Starr of Atlantic Retail Properties were involved in this transaction. Landlord will be responsible for payment of a commission to Ben Starr.

Nothing contained herein is intended to bind either Landlord or Tenant unless and until a lease has been fully executed and delivered by both parties, it being understood that neither Landlord nor Tenant shall have any obligations, nor shall

any be imputed, on account hereof.

ELSON CLOVERLEAF LP

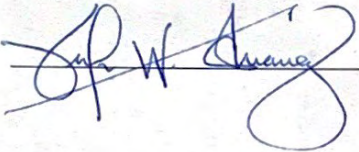
(Landlord)

A handwritten signature in blue ink, appearing to read "J. Katzen", written over a horizontal line.

Joshua Katzen, President of General Partner

CYPRESS TREE NATICK MANAGEMENT, INC.

(Tenant)

A handwritten signature in blue ink, appearing to read "Jeffrey W. Chung", written over a horizontal line.

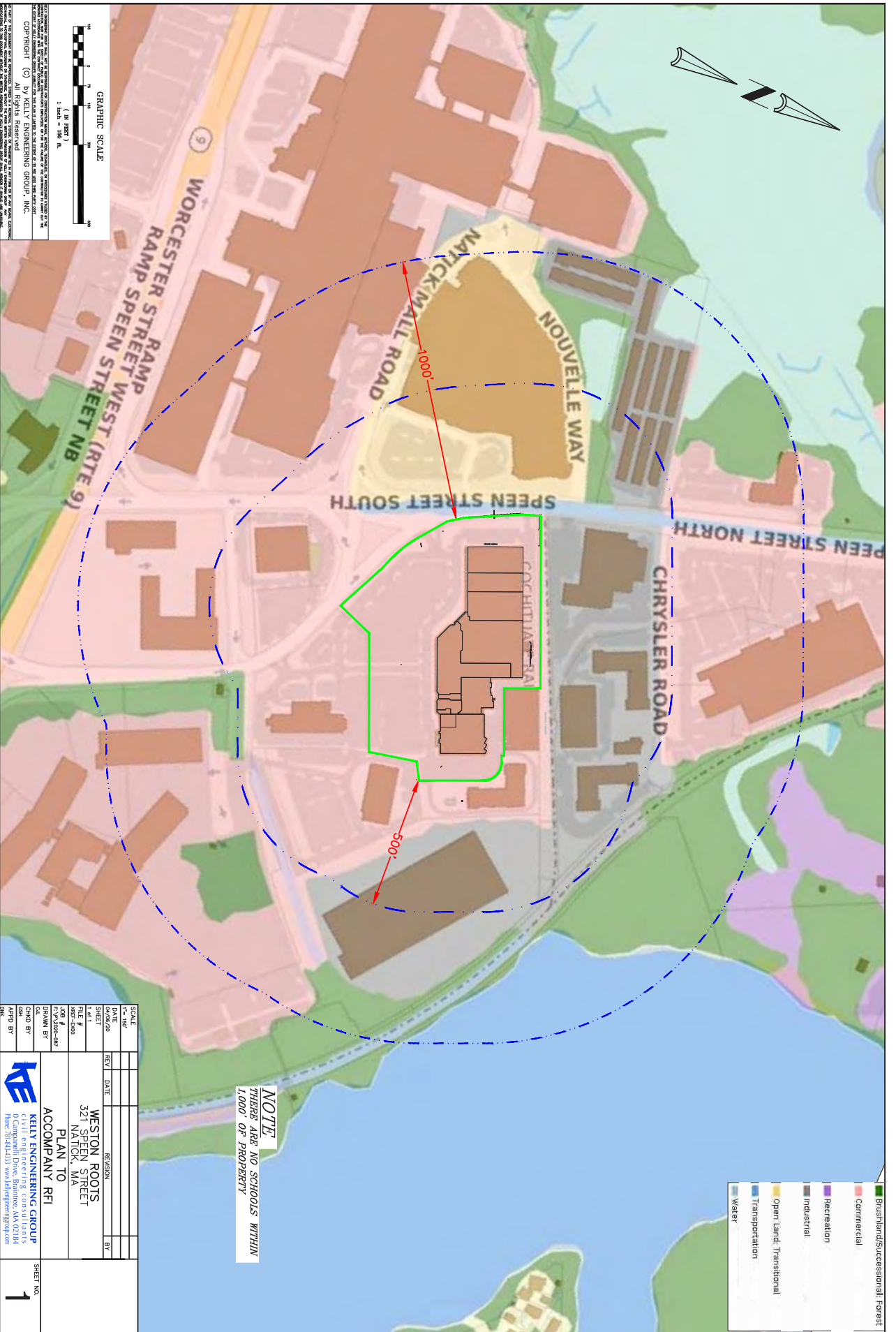
Compliance with Applicable Buffer Zone and Zoning Requirements

We believe that our proposed facility is the ideal location for a Marijuana Retail Establishment in the town of Natick.

CTM will be leasing a 5,000 square foot ground floor retail space at 321 Speen Street at the east end cap of the Cloverleaf Shops, between Route 30 and Route 9. Our proposed facility falls within Natick's Marijuana Retail Overlay District, and thus the proposed Marijuana Retail use would be allowed by Special Permit at this location.

There are no schools within 1,000 feet of the property and no other Marijuana Retail Establishments within 1,000 feet. We believe that the appropriateness of this site, as well as CTM's history and commitment to the Natick community, make our proposed facility and our company a uniquely capable partner in the adult-use marketplace.

The following GIS map prepared by our surveyor illustrates our proposed facility at 321 Speen Street as well as all properties and uses that surround our facility within applicable buffers as set forth in the Town's Zoning Bylaw.



Build Out & Operations Timeline

CTM believes that every partnership we engage in with our host communities must be firmly grounded in the values and goals of residents, neighbors, and local leaders.

We understand that our goal of building a safe, secure, and minimally disruptive retail presence directly aligns with the goals of the Town of Natick as well as our business and community partners surrounding our location at 321 Speen Street. The plans we have developed for our facility at the Cloverleaf Mall are distinctly designed to protect public health and safety, while the location significantly decreases the impacts of any traffic congestion that may result with the arrival of a new adult-use cannabis retailer in the area. Furthermore, CTM has significant development and construction experience in the Town of Natick and has successfully navigated the CCC's lengthy application and approval process.

Our team is also privileged to have extensive knowledge and experience, through our founding partner Todd Finard and Finard Properties, in developing safe, welcoming places that create positive public interactions with retail establishments. We are determined, as a locally owned business and as a team that values our local roots in this area, to create a retail facility that is warm, comfortable, minimally disruptive, and respectful of our community partners. This type of placemaking finds opportunities, such as the location at 321 Speen Street, to create a valuable retail presence that coordinates well with existing businesses nearby while maintaining its own identity, accessibility, and security features.

If CTM is awarded one of Natick's Adult Use Marijuana Retailer licenses, our team is focused on developing this exceptional space, and will employ the expertise of our entire staff to expedite the construction, state approval, and final opening process for our proposed facility.

A summary of the proposed milestones for CTM's build out and operations is outlined on the following pages. However, given the unpredictable nature of construction schedules and the recent Stay at Home Advisory issued in the Commonwealth as a result of the COVID-19 health crisis, CTM provides the proposed timeline as a draft. We are very open and willing to discuss each detail with the Town of Natick as the community begins to emerge from this crisis but would like to be conscious of the potential need to adjust our timeline as town leaders determine the best ways to move ahead in the coming weeks and months. We would welcome the opportunity to work with the Town's administrative team and Board of Selectmen to expediate the timeline by adjusting the dependency milestones to work on various tasks concurrently rather than serially. For example, CTM is willing to commence the retail buildout as soon as possible to help expediate the schedule to get to opening sooner.

Buildout

CTM is committed to building a retail space that is warm and inviting to our guests. With an open concept and welcoming, modern features, we've designed our facility to make guests feel comfortable to venture in, meet with our staff for personal consultations, and be educated on the various cannabis products we offer as well as safe consumption practices. Given the high ceilings at 321 Speen Street, our team envisions a "Park" theme buildout to create an airy and natural space. With the use of greenery and LED lights we can accentuate the high ceiling height space to create an environment that feels comfortable relaxed and encourages a sense of freedom for guests to come, and stay, to learn, and discover from our knowledgeable staff.

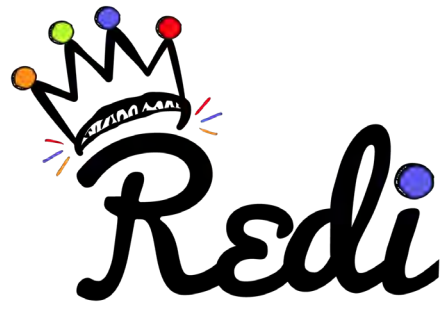
The design also provides natural elements to allow easy queuing, supports creative social distancing, and utilizes repurposed wood for a more sustainable solution. For example, we can utilize artificial grass (pictured) intermixed with the sustainable wood flooring in six-foot intervals to easily indicate to guests where to queue.

Buildout and Operations Timeline Summary

CTM's timeline for constructing and commencing operations at its proposed facility in Natick will be constrained by two permitting tracks: the necessary milestones set forth by the Natick entitlement process and the CCC's licensing milestones. There is some overlap and dependences between these processes that create an extended timeline to opening. For example, Natick asks for a Deemed Complete application from the CCC in order to begin the special permit process, and then asks for a building permit, may cause extended delays for commencing construction. CTM would welcome the opportunity to commence construction sooner to achieve an early opening date.

Having reviewed the timelines contained in both of these processes, the proposed timelines in the summary below is what CTM projects based on meeting completed application from the CCC.

However, since there is some variation in the timing between the CCC and the Town of Natick's processes, we would like to make clear to the RFI Review Committee that we would like help to pursue opportunities to accelerate this schedule wherever possible. CTM is ready to fund, build, and begin operations at a faster schedule and the Town of Natick should feel confident that CTM has the available capital and talent to move forward as fast as the community will allow. CTM's proposed store at 321 Speen Street is a new retail space, therefore requiring relatively limited construction to be ready to open. CTM would not need to renovate an older retail establishment and would simply buildout the interior retail space and security measures.





PICK UP

ORDER

Redi



For clarity, the Natick permitting milestones are provided in bold, the CCC licensing milestones are in italics, and CTM's construction milestones are underlined:

June 9, 2020

Submit RFI Response for HCA with Town of Natick

June, 2020

CTM is notified of selection for meeting with municipal staff review group, meeting is scheduled and held

July, 2020

CTM holds Community Outreach Meeting

August, 2020

CTM is notified of recommendation to Board of Selectmen as preferred applicant

August – September 2020

HCA negotiations with Board of Selectmen

September 15, 2020

HCA is executed

September 16, 2020

CTM submits complete Application to the CCC

November, 2020

CTM receives notification that CCC application has been deemed complete

(It may take longer than six weeks for the CCC to deem the application complete, which would delay CTM's ability to file its special permit pursuant to Section III-K.8.4 of Natick's Zoning By-Law.)

November, 2020 CTM files Special Permit Application

November, 2020

CCC Receives Confirmation from Natick of CTM Compliance with Zoning Bylaws

December, 2020

Planning Board Public Hearing(s) on CTM Special Permit Application

January, 2020

CTM receives Provisional License (this milestone is achieved within 90 days of CCC deeming application complete.

January, 2021

CTM receives Special Permit from Planning Board at its meeting subsequent to CTM's receipt of Provisional License

January, 2021

Special Permit filed with Town Clerk's Office

February, 2021

Expiration of 20 -day appeal period for Special Permit; CTM records Special Permit

February, 2021

CTM applies for Building Permit

February, 2021

CTM receives Building Permit, commences construction

February 2021

CTM files for Architectural Review with CCC.

March and April, 2021

Ongoing inspections by Natick Building Department during buildout

CTM hiring process

May, 2021

CTM receives Certificate of Occupancy for facility

CTM begins training employees

May, 2021

CCC inspection of facility

June, 2021

CCC issues Final License

June, 2021

CTM applies for license from Board of Selectmen as soon as receives Final License from CCC

June, 2021

CCC provides commence operations authorization

July, 2021

Board of Selectmen Hearing on CTM license

July, 2021

CTM receives license from Board of Selectmen

August 1, 2021

CTM opens for business

The proposed timeline to opening is greatly dependent on the CCC's review and approval process, and the interplay between this process and the Natick milestones. The CCC application process can only begin with the execution of an HCA. The CCC is not bound by regulations for a given or predictable timeline for their review and approval, however, CTM has recently completed the CCC process for its Newton, Massachusetts, retail dispensary. It is our experience that the CCC is taking six months to issue a "deemed complete" notification on its applications. We are hopeful that CCC is moving faster as they have added additional staff, but they are not bound to a predetermined schedule. Unless this process is shortened substantially, CTM will not be able to begin the public hearings with the Planning Board until the second quarter of 2021.

Finally, CTM is committed to a strong community outreach program throughout the development process and will be core to our operations. We understand that, by working with neighboring community groups and participating in area events, we can effectively build awareness, relationships, and cooperation within the community that will lead to a positive groundbreaking for CTM's Natick facility.

Plan to Obtain Liability Insurance Policy

Summary

CTM will obtain and maintain the required General Liability and Product Liability insurance coverage as required pursuant to 935 CMR 500.105(10), or otherwise comply with this requirement, as evidenced by the attached letter confirming CTM's engagement with Amplified Insurance Partners (A Telamon Company).

Plan to Obtain Liability Insurance Policy

CTM has engaged with multiple insurance providers offering General and Product Liability Insurance coverage in the amounts required in 935 CMR 500.105(10). We have elected to purchase insurance through Amplified Insurance Partners (A Telamon Company), an established insurance provider in the legal marijuana industry, as evidenced by the attached letter confirming CTMs engagement. We are continuing discussions with Amplified Insurance Partners and will engage with them for a full purchase of the required liabilities, including Workers Compensation, General Liability, Product Liability, Environmental Liability, Umbrella Liability, Cyber Liability, Directors & Officers Liability including additional Management Liability Coverage, as well as Property Coverage including Builder's Risk & Course of Construction, once CTM receives a Provisional License.

PLAN DETAILS

Once CTM receives its Provisional Marijuana Establishment License from the CCC, we will engage with Amplified Insurance Partners (A Telamon Company) to purchase and maintain the following insurance coverage, as required by 935 CMR 500.105(10), or any other requirement pursuant to the Town of Natick, or CTMs lease agreement:

- a. CTM will obtain and maintain general liability insurance coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually, and product liability insurance
- b. coverage for no less than \$1,000,000 per occurrence and \$2,000,000 in aggregate, annually.
- c. The deductible for each policy will be no higher than \$5,000 per occurrence.
 - Workers Compensation
 - Environmental Liability
 - Property Coverage including
 - » Builder's Risk
 - » Course of Construction
 - Umbrella Liability
 - Directors & Officers Liability including Additional Management Liability Coverage
 - Cyber Liability

In the event that CTM cannot obtain the required insurance coverage, CTM will place a minimum of \$250,000 in an escrow account. These funds will be used solely for the coverage of liabilities. CTM will replenish this account within ten business days of any expenditure.



04/07/2020

Natick Cannabis Review Group
Town of Natick
13 East Central Street
Natick, MA 01760

Re: Cypress Tree Management Natick, Inc.
419 Boylston Street
Suite 300
Boston, MA 02116

Natick Cannabis Review Group:

I have been asked to confirm with you that Cypress Tree Management Natick, Inc. once provided with a Provisional Marijuana Establishment License will purchase the necessary lines of insurance required by the Town of Natick and the landlord to maintain a fully insured business operation. These coverages are:

- Workers Compensation
- General Liability
- Product Liability
- Environmental Liability
- Property Coverage including
 - Builder's Risk
 - Course of Construction
- Umbrella Liability
- Directors & Officers liability including additional Management Liability coverage
- Cyber Liability

Amplified Insurance Partners-A Telamon Company has been insuring dispensaries and other cannabis partners for many years and are the exclusive Insurance Broker and Agent to many of the largest cannabis companies in Massachusetts.

Sincerely,

Bryan Dank

Bryan Dank

Vice President

Amplified Insurance Partners | A Telamon Company

30 Southwest Park, Westwood, MA 02090

(Direct Phone) 617-614-1211

(Direct Fax) 617-243-7511

(Cell) 508-864-6474

Email: bdank@amplifiedinsurance.com

www.amplifiedinsurance.com

Certificates of Insurance: retailcerts@amplifiedinsurance.com

Operating Policies and Procedures

Security

Summary

CTM takes the security of our neighbors, customers, and products very seriously. The success of our retail establishment depends on creating a welcoming and safe environment for all who interact with our business. We value our strong partnership with the Town of Natick, and it is important to the CTM owners, management, and staff to foster that partnership by being a great neighbor. The founders of CTM all live, work, and are raising their children in the local area and would never do anything to jeopardize their community – and therefore make security a top priority.

Under the regulations established by the CCC, the security measures at CTM’s facility require our company to meet or exceed those currently in use by banks and financial institutions. Our location will be one of the most secure retail facilities within the Town of Natick.

Under the skilled direction of Rick Nagle, our local security consultant with over 30 years of law enforcement experience (please see Rick’s summary resume in the Qualifications section), our security personnel adhere to the highest standards of excellence and safety. In strict accordance with state laws and regulations, CTM will provide security with a meticulous focus on both the outside and inside of its proposed facility.

[Redacted text block containing approximately 10 lines of blacked-out content]

CTM's Security Plan as well as the Security Operating Policies and Procedures (included below) shall serve as the standard operating procedures for the proposed facility's operations and personnel, in accordance with 935 CMR 500.110.

Security Plan

[REDACTED]

EXTERIOR SECURITY

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

INTERIOR SECURITY

[REDACTED]

[REDACTED]

SECURITY PERSONNEL

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CASH MANAGEMENT

[REDACTED]

[REDACTED]

[REDACTED]

Security Operating Policies and Procedures

FOR CANNABIS CONTROL COMMISSION SUBMISSION
935 CMR 500.110

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Personnel Policies

Summary

CTM is an equal opportunity employer and a proud, local business of experienced cannabis professionals whose diverse backgrounds are a cornerstone to our success.

We want to create careers in the cannabis industry for our community partners. As employers of local talent, we understand that our hiring and personnel policies are a crucial part of attracting, retaining, and promoting the most qualified individuals with a variety of life experiences. For CTM, this means that our fundamental belief in equal opportunity for all plays a prominent role in our operations.

Aside from our policy to hire, retain, and promote outstanding individuals from different racial, cultural, economic, and ethnic backgrounds - regardless of sexual orientation or disability status - CTM actively recruits individuals from the community that meet any of the following backgrounds as well:

- A Diversity of Age
- Part-time Stay at Home Parent Hours
- Veterans
- A Diversity of Life Experience

Furthermore, we believe that our preference for promoting from within our organization gives our company the distinct advantage of maintaining high career satisfaction and an important opportunity to grow and succeed in the cannabis industry. CTM will create an environment for our employees to have careers rather than just a job.

Our personnel policies are also designed to provide employees an understanding of what is expected of them, and to ensure the consistent, fair, and uniform treatment of every individual. The cannabis industry is subject to strict regulatory standards and CTM is careful to ensure that every employee, at every level of company, is in compliance with existing employment, safety, and training laws and regulations. All employees are subject to a background check, initial and ongoing training, and are aware of CTMs zero tolerance policy for any instances of harassment, victimization or discrimination.

Personnel Operating Policies and Procedures

FOR CANNABIS CONTROL COMMISSION SUBMISSION 935 CMR 500.105

It is CTM's policy to provide equal opportunity in all areas of employment, including recruitment, hiring, training and development, promotions, transfers, termination, layoff, compensation, benefits, social and recreational programs, and all other conditions and privileges of employment, in accordance with applicable federal, state, and local laws. CTM will make reasonable accommodations for qualified individuals with known disabilities, in accordance with applicable law.

CTM is an equal opportunity employer and all qualified applicants will receive consideration for employment without regard to race, color, religion, gender, sexual orientation, gender identity, or national origin, age, disability status, Family & Medical Leave, protected veteran status, or any other characteristic protected by law.

Management is primarily responsible for seeing that equal employment opportunity policies are implemented, but all members of the staff share the responsibility for ensuring that, by their personal actions, the policies are effective and apply uniformly to everyone. Any employee, including managers, determined by CTM to be involved in discriminatory practices are subject to disciplinary action and may be terminated. CTM strives to maintain a work environment that is free from discrimination, intimidation, hostility, or other offenses that might interfere with work performance. In keeping with this desire, we will not tolerate any unlawful harassment, victimization, and discrimination of employees by anyone, including any manager, co-worker, vendor or clients.

In accordance with 935 CMR 500.105(2), all current owners, managers and employees of CTM that are involved in the handling and sale of marijuana will successfully complete Responsible Vendor Training Program, and once designated a "responsible vendor" require all new employees involved in the handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually and those not selling or handling marijuana may participate voluntarily. CTM will maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussions concerning the effect of marijuana on the human body; diversion prevention; compliance with tracking requirements; identifying acceptable forms of ID, including medical patient cards; and key state and local laws.

All CTM policies will include a staffing plan and corresponding records in compliance with 935 CMR 500.105(1)(h) and ensure that all employees are aware of the alcohol, smoke, and drug-free workplace policies in accordance with 935 CMR 500.105(1)(j). CTM will also implement policies to ensure the maintenance of confidential information pursuant to 935 CMR 500.105(1)(k). CTM will enforce a policy for the dismissal of agents for prohibited offenses according to 935 CMR 105(1)(l).

All CTM employees will be duly registered as marijuana establishment agents and have to complete a background check in accordance with 935 CMR 500.030(1). All marijuana establishment agents will complete a training course administered by CTM and complete a Responsible Vendor Program in compliance with 935 CMR 500.105(2)(b). Employees will be required to receive a minimum of eight hours of on-going training annually pursuant to 935 CMR 500.105(2)(a).

Prevention of Diversion of Marijuana to Minors or the Illicit Market

Summary

As a local company with a strong history in the Town of Natick, one of CTM's paramount concerns is the safety and security of our neighbors, employees, and guests. Our security personnel, as well as our employees, are all trained in the proper methods to identify and deter fraudulent activity and to protect the health and safety of every individual that interacts with our retail facility.

From ensuring that our potential guests produce the proper identification, to the 24/7 monitoring of our location, CTM provides comprehensive security to deter any diversion of products throughout every stage of the delivery, storage, and sales cycle. We use the latest active and passive technology to detect fraud, record and track all of our products, and protect our facility from theft or other potential diversion activity.

We are committed to maintaining the highest standards in safety and security, and continuously revise our operating procedures to ensure additional resources and safeguards are immediately put in place based on current best practices.

Prevention of Diversion Plan

PRODUCT SAFETY

All products will be strictly controlled, and access will be limited to the minimum number of specifically authorized dispensary agents essential for efficient operation. Any product that is delivered, displayed, or removed for sanitation or sales purposes, will be returned to the separate, securely monitored and locked storage vault immediately. During non-business hours, all products will be secured in the same separate, secure vault and monitored by 24/7 security cameras and alarms.

CTM utilizes LeafLogix's "seed to sale" software that is specifically designed for inventory control and tracks the location and weight of all cannabis products. By using this type of program, we will be able to quickly identify discrepancies in our inventory and begin an investigation should one become necessary. Furthermore, LeafLogix's seed to sale program has the ability not to over dispense cannabis products to any guest, in accordance with Cannabis Control Commission regulations under 935 CMR 140 (c).

Our dispensary agents and CTM staff will educate guests about minors coming into contact with the products sold at our retail location. Guest education will include the safe storing and securing

of cannabis products, as well as the requirements under Massachusetts law. The focus of our guest education will be to reinforce the dangers of distribution to and use by minors, along with proper notifications through product packaging and signage.

In the instance of a potential diversion event, proper investigation of incidents or discrepancies identified during inventory or loss audit will be reported immediately to the local law enforcement authorities, and the Cannabis Control Commission within 24 hours. Following any instance of diversion, theft, or loss, CTM will secure all products and conduct a risk assessment to determine whether additional safeguards or resources are necessary.

SECURITY

All CTM security personnel and dispensary agents will be trained on how to identify valid identification (Photo ID) presented by our guests. Security personnel will be the first to greet customers upon entering the facility and CTM will properly identify individuals entering the establishment to limit access to those 21 years or older. At the discretion of our security personnel, CTM employees will refuse entry of any guest that presents questionable identification credentials or who may be deemed to put other guests, employees, or the public, at risk.

Upon entering the facility, guests will be in a secure vestibule where they will be required to present proof of identification and age (e.g., driver's license, passport, green card, or international ID). CTM utilizes the latest technology to securely read not just the identification's barcode, but also the microprint, infrared, and any holograms that verify age and expiration. CTM will utilize IDScience technology for secure ID confirmation. This technology includes pass back features that will notify security personnel if the ID presented was scanned before, or if the individual or ID appears on any ban list – the same technology in use by MassPort at Logan Airport for domestic and international travelers.

Prior to any purchase being made with CTM customer service representatives, customers will again show their identification to purchase products. Upon completion of a purchase, security will facilitate a safe exit from the building for customers, in order to reduce any disruption of service. CTM will institute a separate entrance and exit from the building to prevent congestion. Security personnel, managers and employees will have access to a duress alarm.

Prevention of Diversion of Marijuana to Minors or the Illicit Market Operating Policies and Procedures

FOR CANNABIS CONTROL COMMISSION SUBMISSION **935 CMR 500.105**

CTM anti-diversion procedures includes methods for identifying, recording, and reporting diversion, theft, or loss and for correcting all errors and inaccuracies in inventories. The integrity of the supply chain in every stage from seed to sale shall be protected through anti-diversion methods using a comprehensive security system, LeafLogix software tracking, as well as strict and numerous inventory counts. All employees shall receive anti-diversion training as part of their initial and subsequent training. CTM has established a work environment that values employees and that fosters a culture of responsibility to mitigate risk and create a safe work environment. Pursuant to 935 CMR 500.105(1)(l), CTM'S Written Operating Procedures will include a policy for the immediate dismissal of any marijuana establishment agent who has diverted marijuana.

Continual supply chain risk assessments will be performed to reduce vulnerability and ensure continuity. Any discrepancies identified in inventory shall immediately be recorded and investigated to the cause. Pursuant to 935 CMR 105(13)(b), any incidents of diversion that occur during transport between marijuana establishments shall be duly reported to the Commission and law enforcement authorities. In addition, discrepancies shall be recorded and reported according to CTM'S incident response plan.

In accordance with 935 CMR 500.140(4), all on site transactions are limited to one ounce of marijuana or five grams of marijuana concentrate to a customer per transaction. Random and routine monitoring and surveillance cameras shall be performed by security personnel. In accordance with 500.140(3)(c) all sales of marijuana and marijuana products will not exceed the potency levels as proscribed by 935 CMR 500.150(4). CTM will also incorporate a Point-of-sale System that does not allow for a transaction in excess of the limit for marijuana or marijuana product purchases by any customer established by 935 CMR 935.140(3)(a) or the potency levels established in 935 CMR 935.140(3)(b).

Inventories will be highly restricted, secured, and surveilled areas with posted limited access area signs. Only managers shall have security designations to access stored inventory. Monthly inventory checks in compliance with 935 CMR 105(8)(c)(2) will be conducted. A dispensary agent's inventory shall remain locked and accessible only to that agent and a manager. The manager shall

conduct routine and random auditing of dispensary agents' inventory. CTM's retail design of a centralized fulfillment area in each of its stores creates easier ways to conduct inventory counts and further limits the number of employees who have direct access to products. Sales shall be documented, recorded and stored using seed-to-sale inventory tracking. Surveillance cameras shall record and store all transactions in compliance with 935 CMR 500.110(5)(a)(4).

A copy of the shipping manifest shall be transmitted to the receiving dispensary prior to transport. All dispensary deliveries shall be processed prior to leaving a marijuana establishment in accordance with 935 CMR 500.105(13)(a)(7). Pursuant to 935 CMR 500.105(13)(a)(6) all vehicles transporting marijuana products will be staffed with a minimum of two marijuana establishment agents and one agent shall remain with the transportation vehicle at all time. Delivery routes and times will be randomized as required by 935 CMR 500.105(13)(a)(12). Once the delivered product is accounted for, it shall be stored in the locked and secured and monitored safe room.

In case of loss inventory discrepancies discovered by any employee shall be reported to the department manager upon discovery. The manager shall report all unresolved inventory discrepancies to the Cannabis Control Commission and law enforcement authorities in accordance 935 CMR 500.105(13)(b). An internal investigation to determine the outcome of the inventory discrepancy will also be conducted.

Marijuana Storage

Summary

Since we started our locally-owned business, we have heard from countless residents across the Commonwealth and we understand the concerns that stem from the presence of cannabis products in each community.

As we like to say, the security measures at CTM facilities allow our company to meet or exceed the security that is currently in place at local banks and financial institutions. Under the regulations established by the Cannabis Control Commission, our location will be one of the most secure retail facilities within the Town of Natick.

The foundation of our business in Natick will be built upon a secure, safe facility for the storage of all cannabis products. All of our dispensary agents, as well as our security personnel, are trained in the appropriate methods to safely secure and store CTM's products on-site.

According to our strict procedures and protocols, all cannabis products will be placed in a securely monitored and locked storage vault with limited access, and further monitored by 24/7 security cameras and alarms. Access to storage areas will be restricted to employees only, via keypad, and there will be tiered access among employees, in order to further restrict access to, and ensure the safety of CTM's products.

During our daily operations in Natick, all products will be strictly controlled, and access will be limited to the minimum number of specifically authorized dispensary agents essential for efficient operation. This will include multiple inventory counts throughout each day's operation. Management will ensure that the storage vault has adequate space, lighting, ventilation, temperature control, humidity control, and storage equipment present and maintained to preserve the quality and safety of all of our products. Any product that is delivered, displayed, or removed for sanitation or sales purposes, will be returned to the separate, securely monitored and locked storage vault immediately. During non-business hours, all products will be secured in the same separate, secure vault and monitored by 24/7 security cameras and alarms.

CTM uses LeafLogix's "seed to sale" inventory control software that is designed for the marijuana industry to track the location and weight of all cannabis products. If there is a potential diversion event, the seed to sale program will be able to quickly identify discrepancies in our inventory and allow security personnel begin an investigation.

CTM has a zero-tolerance policy for the security of our storage vaults. If any dispensary agent is present in the secure vault without authorization, or good reason, will be immediately terminated.

Marijuana Storage Operating Policies and Procedures

FOR CANNABIS CONTROL COMMISSION SUBMISSION 935 CMR 500.105

Pursuant to 935 CMR 500.105(11)(a)-(e), CTM will provide adequate lighting, ventilation, temperature, humidity, space and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110. CTM will have a separate area for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, unless such products are destroyed. CTM storage areas will be kept in a clean and orderly condition, free from infestations by insects, rodents, birds and any other type of pest. The CTM storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.

CTM storage policy dictates that product may only be stored in areas under video surveillance. Only authorized marijuana establishment agents have access to product storage areas, product storage keys, and or access cards. Storage rooms must remain locked at all times except times needed to transfer product. Dispensary agents in storage rooms without authorization, or good reason, will be terminated. All product must be returned to storage at the end of processing work orders, or at the end of the business.

Pursuant to 935 CMR 500.105(13)(d), CTM will transport marijuana products in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products and the storage compartment will be sufficiently secure that it cannot be easily removed. If CTM plans to transport marijuana products to multiple other establishments in the future, it will seek the Commission's permission to adopt reasonable alternative safeguards. access to products. Sales shall be documented, recorded and stored using seed-to-sale inventory tracking. Surveillance cameras shall record and store all transactions in compliance with 935 CMR 500.110(5)(a)(4).

A copy of the shipping manifest shall be transmitted to the receiving dispensary prior to transport. All dispensary deliveries shall be processed prior to leaving a marijuana establishment in accordance with 935 CMR 500.105(13)(a)(7). Pursuant to 935 CMR 500.105(13)(a)(6) all vehicles transporting marijuana products will be staffed with a minimum of two marijuana establishment agents and one agent shall remain with the transportation vehicle at all time. Delivery routes and times will be randomized as required by 935 CMR 500.105(13)(a)(12). Once the delivered product is accounted for, it shall be stored in the locked and secured and monitored safe room.

In case of loss inventory discrepancies discovered by any employee shall be reported to the department manager upon discovery. The manager shall report all unresolved inventory discrepancies to the Cannabis Control Commission and law enforcement authorities in accordance 935 CMR 500.105(13)(b). An internal investigation to determine the outcome of the inventory discrepancy will also be conducted.

Transportation and Onsite Deliveries both to and from the Marijuana Establishment

Summary

Our responsibility for the safety of our neighbors, guests, and employees extends far beyond the walls of our facility. The transportation, delivery and receipt of cannabis products is yet another aspect of maintaining safe, reliable, and high-quality cannabis products and CTM will conduct all of these operations in strict accordance with applicable laws and regulations.

All transportation vehicles will be staffed by a minimum of two dispensary agents, with one dispensary agent remaining in the vehicle at all times. Dispensary agents must weigh all products prior to the departure and after the arrival of the delivery vehicle, and every item will be logged and monitored in CTM's LeafLogix seed-to-sale tracking software.

Any vehicle that transports cannabis products for CTM will be unmarked and will randomize their routes to CTMs facilities. All dispensary agents engaged in transportation will have secure communication with all of CTMs facilities and will check-in every 30 minutes during their delivery. All dispensary agents engaged in transportation will also have their own mobile telephones present and available at all times during delivery as well as a global positioning system monitoring device that CTM management and compliance officers can monitor during any transportation activity.

CTM will grant the Cannabis Control Commission, local emergency responders, and state and local law enforcement access to the transportation vehicles in order to prevent diversion, theft, or loss of contents.

Furthermore, CTM transportation vehicles will be equipped with:

- GPS Monitoring
- Separate Locked Safe for Storage of All Cannabis Products
- Alarm Systems
- Temperature Controls to Maintain the Quality & Safety of CTMs Cannabis Products

CTM values constant compliance in our communication, security, and safety protocols. Each delivery made to or from the Natick facility shall follow the same procedures and will be closely coordinated between CTMs security personnel, transportation supervisors, and inventory managers. For any delivery of cannabis products, the transportation supervisor will receive a shipping manifest and will choose a driving route for the transportation agents. The transferring facility will assemble the product order and the transport team will notify the receiving facility the approximate time of the delivery. The receiving inventory manager will be sent a delivery manifest and will confirm receipt with the transportation team. CTMs security team will be notified that the transportation vehicle is being loading for delivery and once complete, will direct the transportation team to

commence the delivery.

Each delivery is closely monitored by security personnel and will be notified when or if the transportation vehicle makes any unscheduled stops. Any unscheduled stops that must be made along the route will be in areas that the dispensary agents can reasonably expect video cameras to be present. Prior to the transport team leaving the premises, or during a delivery, the team will test each communication device to ensure they are in proper working order. If for any reason this fails, they will return to their originating location, or will not leave until communication devices are in full working order.

Once underway, the transportation team will alert the receiving inventory manager 30 minutes prior to arrival. Upon arriving at the receiving facility, the inventory manager and security personnel will escort the delivery team and any products into a secure location inside facility through an employee-only entrance. One of the transporting dispensary agents will remain with the vehicle until the product is fully off loaded. Once management confirms that the manifest matches the physical count, the delivery team may return.

At this point, the receiving inventory manager along with their team will be responsible for re-confirming the delivery. The dispensary agent team will re-weigh, measure, and count all inventory received. CTMs policy is to re-confirm all deliveries within an 8-hour period, within the facilities secure storage areas, and under the 24/7 security camera monitoring. After completion, the inventory manager will sign, date, time stamp, and log the manifest and will log all other actions in the seed to sale software. All logs will include the mileage from departure to arrival, as well as the make, model, and license plate number of the vehicle used for transport.

We believe that the best way to ensure security is through preparation. We offer a careful and meticulous training program covering all aspects of safety and regularly retrain our security personnel and dispensary agents throughout their careers at CTM. As a local company, we are proud of the extensive efforts we take to create a safe and enjoyable retail experience in the communities we serve and will continue to offer the most extensive training for our dispensary agents to ensure our high standards are met in every aspect of our service to the Town of Natick.

Transportation Operating Policies and Procedures

FOR CANNABIS CONTROL COMMISSION SUBMISSION

935 CMR 500.105

Pursuant to 935 CMR 500.105(13)(a), CTM will only transport marijuana between its licensed Marijuana Establishments and by its registered marijuana establishment agents. All Marijuana Establishments involved in the transportation will ensure that the products are linked to CTM's LeafLogix seed-to-sale tracking software and any undeliverable product will be taken back to its place of origin. All vehicles will be staffed by a minimum of two agents, with at least one remaining in the vehicle at all times. The product will be weighed and inventoried upon both departure and arrival and a log will be maintained describing any vehicle stops. All routes will be randomized and will be within the Commonwealth of Massachusetts.

All CTM agents involved in transportation of marijuana products will have a driver's license in good standing issued by the Massachusetts Registry of Motor Vehicles and will carry their agent registration card at all times in compliance with 935 CMR 500.105.(13)(g).

In accordance with 935 CMR 500.105(13)(b), CTM agents will document and report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities within 24 hours of the discovery of the discrepancy. All vehicles accidents, diversions, losses or other incidents deemed reportable that occur during transport shall be reported within 24 hours.

All vehicles that are used for transport shall comply with 935 CMR 500.105(13)(c). The vehicle used for transportation will be owned or leased by CTM, properly registered, inspected and insured with the Commonwealth, equipped with a Commission-approved alarm system and have heating and cooling systems appropriate for marijuana products. The vehicle will not have any markings that indicate the content and marijuana products will not be visible from outside the vehicle. 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).

Pursuant to 935 CMR 500.105(13)(d), CTM will transport marijuana products in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products and the storage compartment will be sufficiently secure

that it cannot be easily removed. If CTM plans to transport marijuana products to multiple other establishments in the future, it will seek the Commission's permission to adopt reasonable alternative safeguards. As stated in 935 CMR 500.105(3)(b)(16)

CTM will ensure that each vehicle transporting marijuana products will have a GPS monitoring device that complies with 935 CMR 500.105(13)(e). Each CTM agent transporting marijuana will have access to a secure form of communication and will test said devices prior to and immediately after leaving the originating location. Contact will be made with the originating location every 30 minutes throughout the trip.

Manifests will be completed in accordance with 935 CMR 500.105(13)(f).

Delivery to Customers

CTM is ineligible to obtain a license to deliver to customers for a period of 2 years, according to recently approved Cannabis Control Commission regulations under 935 CMR 500.050(10).

A delivery-only license type is available exclusively for certified Economic Empowerment Priority Applicants, Social Equity Program Participants, and Microbusinesses with a Delivery Endorsement from the Commission, for an initial period of two years from January 2020. CTM is not an approved Economic Empowerment, Social Equity, or Microbusiness with the Cannabis Control Commission.

COVID-19 Response

Due to the extraordinary circumstances surrounding the COVID-19 public health crisis, the Cannabis Control Commission has recently issued regulations that allow for medical marijuana retailers to deliver to customers given social distancing protocols put in place during the state of emergency. While it is difficult to predict how long such protocols will be put in place, CTM will design our operations around social distancing in the event that these precautions may carry over in time for opening our retail location.

For instance, many retail locations are operating curbside pickup options to minimize queueing and allow for social distancing to be maintained. CTM has reviewed our retail plans for our Natick facility and, if circumstances allow for curbside pickup to be in place once our operations are underway, we believe we can safely implement the following proposed procedures:

DRAFT CURBSIDE PICKUP PROCEDURES

For Discussion Purposes Only

- Guests will place their orders through CTMs website, live chat, or by calling dispensary agents at the number provided
- If guests are ordering through CTMs website, CTM will require a mobile number and ask each guest to include any additional relevant information for their order
- Once the order has been filled, CTM will send an order confirmation text. Guest will be instructed to proceed to the dispensary and park in an available parking space labeled “CURBSIDE PICKUP ONLY”
- Upon arrival, guests will reply “Curbside” to the order confirmation text they received when their order was filled. This text message will notify our dispensary agents to prepare and complete the transaction
- Dispensary agents will call the mobile number provided by the guests to confirm the order, method of payment, as well as the make, model and color of the vehicle of the guest
- Our dispensary agent will then bring the order to the guest’s vehicle using proper social distancing and Personal Protective Equipment (PPE), as necessary, to complete the transaction

- CTM will strongly recommend that our guests use a debit card to reduce physical interaction. However, if guests elect to use cash, dispensary agents will provide change
- For those guests who do not have a mobile phone, CTM allows online orders to be placed without a confirmed mobile number. A dispensary agent will be assigned to monitor the curbside pick-up locations and will, at a safe distance and according to established social distancing protocols, confirm an online order with the arriving guest and assist in completing the order
- Orders not picked up within one hour of closing will be cancelled and proper inventory procedures shall be followed for adding the products back into inventory
- Standard message and data rates may apply

CTM is committed to coordinating any response to COVID-19 with the Town of Natick throughout this public health crisis to determine our best options for keeping guests, employees, and the community healthy and safe. The proposed curbside pickup procedures are intended to demonstrate the extent to which CTM is prepared to offer the safest possible interaction with our guests and is included here for discussions purposes only.

See: Cannabis Control Commission's Administrative Order No. 1 Allowing Curbside Operations (M.G.L. c. 941, M.G.L. c. 94G, and 935 CMR 501.105, 501.110, and 501.140) issued March 27, 2020 and effective March 28, 2020.

Cultivation Process and Procedures

Summary

CTM is not seeking a cultivation license in the Town of Natick and therefore, this section of the Natick RFI does not apply to CTMs proposed operations in the community.

As a Massachusetts-based, locally owned and operated company, CTM believes in working with the communities in the Commonwealth to create the highest and best value business opportunities for our neighboring communities. The cultivation of cannabis products for sale at our proposed Natick retail location will occur at our cultivation and manufacturing facility scheduled for opening in the Town of Franklin. We believe that creating relationships with our own retail locations, as well as other locations in the state through wholesale agreements, we can provide successful enterprises that can serve and benefit the host communities where we house our operations.

While cultivation will not occur on-site in our Natick facility, we have included our internal guidelines and standard operating procedures in order to demonstrate our full compliance in, and application of the laws and regulations of the Commonwealth and Cannabis Control Commission (CCC).

Cultivation Operating Policies and Procedures

FOR CANNABIS CONTROL COMMISSION SUBMISSION 935 CMR 500.105

Prior to approval of its cultivation facility license by the CCC and pursuant to 935 CMR 500.105(8)(a), CTM will sell marijuana products in its possession at the time it receives approval from the Commission subject to the limitation in 935 CMR 500.140(10). CTM will maintain a 35% reserve of their marijuana products for registered patients pursuant to 935 CMR 500.140(10)(a). In accordance with 935 CMR 500.140(10)(f), CTM may transfer marijuana products reserved for medical use to adult use within a reasonable time prior to the date of expiration.

CTM has its Marijuana Cultivator and Marijuana Product Manufacturer Provisional license from the CCC and is compliant with all applicable laws and regulations pursuant to 105 CMR 725.000. As CTM will be cultivating, processing and selling marijuana products for both medical and adult use, CTM will create virtual separation of the products, pursuant to 935 CMR 500.105(8)(g). At the point of sale, CTM will designate whether the marijuana products are intended for sale for adult use or medical use through tracking methodology approved by the Commission under 935 CMR 500.000. All sales of marijuana in the Town of Natick will be designated for adult use.

Product Manufacturing Process and Procedures

CTM is not seeking a production license in the Town of Natick and therefore, this section of the Natick RFI does not apply to CTMs proposed operations in the community. While production will not occur in Natick, the health and well-being of our guests, employees, and neighbors is critical to CTM. Our leadership team expects and requires that only the highest-quality cannabis products would be available at our retail locations.

Subsequently, every product that CTM offers for sale to our guests at our proposed Natick facility will be authenticated by rigorous testing procedures and the highest manufacturing standards. Our products must meet these strict standards in accordance with the Cannabis Control Commission and we also include numerous product manufacturing standards for safety, environmental stewardship, and product security.

Our mission at CTM is to focus on educating our guests on the safest treatment methods and we ensure that we safeguard that mission by providing a best-in-class cannabis product that is held to the most demanding standards in the industry.

Retail Dispensing Procedures

Summary

Our primary goal at CTM is to create a genuinely welcome experience for our guests. We know that for anyone entering an adult-use facility for the first time, it can be a bit intimidating. Our proposed facility in Natick is intended to benefit our guests, neighbors, and community with a truly outstanding retail experience – one that is far better than any other industry.

A notable team member for CTM is our Director of Retail, Lisa Burke, who oversees all of CTM's retail operations and who, for the last 5 years, has been responsible for the operations at New England's busiest co-located recreational and medical marijuana dispensary, NETA, located in Brookline, Massachusetts. Lisa is an extremely talented and experienced professional, and CTM is especially proud to have someone of her skill level to lead our retail staff.

CTM will achieve our retail goals with a multi-layered staffing approach that is focused on educating our guests through every step of their interaction within our facility. From the moment they encounter a greeter to direct them to the front entrance, all the way to their final decision on a suitable product for their needs, our guests will be met with a warm greeting and an employee who can answer any questions they have. These best practices have been formed by learning the market – what works – and what needs to evolve.

Throughout our experience in the cannabis industry, we have discovered there is widely held belief that the legalization of cannabis can be compared to the end of Prohibition. We believe there is a significant difference. At the end of Prohibition, the vast majority of adults knew what it was like to have alcohol and how it might impair them. That is not the case with today's cannabis products and the potency has dramatically increased over time. Therefore, our mission is to educate guests and the public on the proper use of cannabis products to ensure their experience meets their expectations. Through thoughtful, detailed training with each of our employees, every guest will be met with a dispensary agent that knows the many uses, potency, and dose of each available strain of cannabis so that guests may have all information needed to make the best product decision for themselves.

In fact, the idea of micro-dosing truly resonates with us. Many patients and guests are unaware that dosages are an important factor in their treatment, and ultimately, to their experience of cannabis. We believe we must help to further dispel the negative connotation that can revolve around cannabis and educate our guests and neighbors that they do not need a psychoactive product to find relief. Our dispensary agents are trained to recognize critical factors and ask important, detailed questions to ensure that every guest has a tailored solution that fits each of their needs.

Retail Dispensing Plan

GUEST SAFETY

CTM is committed to safety of all of our guests. Our on-site security is the first to greet any guest and check for a valid photo identification, and each of our dispensary agents is trained in identification procedures in order to reconfirm valid photo ID credentials prior to completing any transaction.

Should a guest not have the proper identification, they will be turned away and CTM will distribute educational materials on the acceptable forms of ID, so that guests may be prepared for their next visit. We will also have Frequently Asked Questions (FAQ's) available, for instance, in the case a patient needs to gain access but not have the proper ID. The number and email for the CCC will be prominently featured and will contain information on how to become a patient in Massachusetts.

Aside from these initial, physical security measures, CTM understands that it is extremely important that our dispensary agents fully understand best safety practices for product dispensing. These safety practices include but are not limited to: sharing medicine and the differences between medical and adult use cannabis; mixing alcohol with cannabis; rules governing out of state; duration of effects on all medicine; child-resistant packaging; public consumption; driving and transporting cannabis. Each dispensary agent will be fully versed and trained in each of these areas of concern and will advise or answer any questions on these best practices, in order for each guest and patient to be fully safe and compliant with applicable laws.

GUEST ENGAGEMENT

Upon entering the retail area of our facility, CTM's Natick location will be an open concept, in order to enhance guest flow throughout the store. When a guest arrives, there will always be a CTM dispensary agent present to immediately greet and direct them to their desired product or retail counter. Dispensary agents will ask each guest about their needs (for example: if they have a reserve order, if they need a private consultation, or if they need to see a menu of available items) and will inform each guest about the options for purchasing, with the aim of keeping a safe, even flow of traffic throughout the location.

Our guests can expect a warm, friendly environment, with dispensary agents ready to answer any product questions. CTM's priority to educate our guests will continue throughout the visit, and our dispensary agents will distribute a standard menu with the names, definitions, and the effects of each strain. We will ensure that every guest understands that effects may vary from person to person and that we offer private consultations for any further questions or educational materials.

CTM will offer our guests competitive pricing. CTM may provide in-store promotions to our medical patients (when applicable). In compliance with 935 CMR 500.105 4 (b) 6 CTM is restricted from promotional sales for adult-use guests. Any social postings for promotions are directed to medical

patients only, and we will gather that information from the database created when a medical patient completes our patient profile forms. In strict compliance with our Sustainability Plan, we will employ video screens or social media postings, or use in-store, reusable signage (such as school chalkboards) to inform guests of our menu of options.

FULL SERVICE

Our full-service options for guests include consultations, in-depth dosage guidance, advise on how to safely consume or medicate using cannabis, as well as a demonstration and tutorials on the use of all non-medical devices. Dispensary agents will ask for proper photo identification prior to engaging in any full-service activity, will ask each guest to describe their past experience with cannabis, and if they have preference for flower, edible, or other product types.

CTM firmly believes in our micro-dosing philosophy, and throughout any interaction with a guest, we will ask about their previous cannabis consumption in order to recommend the proper dosage. As a baseline standard, CTM considers a low and slow exposure to be the best option for a great deal of our guests. We realize that a bad experience with any cannabis product can impact the treatment or recreation that guests are seeking. We also realize that, with lasting effects of up to 6 to 8 hours when consuming an edible product, cannabis can offer an extended period of relief from negative symptoms. CTM dispensary agents are trained to find this balance for our guests in a way that is both nonintrusive and instructive, such as micro-dosing.

EXPRESS CHECK OUT

Online ordering is available to our guests, but each guest must arrive at the retail location to complete the purchase and enter the same security protocols as any other guest. However, after those guests reach the retail floor, our dispensary agents will direct them to the pick-up area – creating a quick and seamless process. Once at the express check-out counter, dispensary agents will reconfirm the proper photo identification, confirm the product order, receive payment, and distribute receipts. In each of the exit bags for CTM products, educational materials will be included, just as it would be throughout a full-service experience. Furthermore, CTM will have laptops or other electronic devices available for guests to place their online order in-store if they wish and have the opportunity to browse our gallery of educational tools throughout the store.

CONTINUING EDUCATION & CUSTOMER CARE

As part of our ongoing efforts to support our guests through in-depth customer care, CTM is offering continuing education to every guest with a follow-up online appointments program. This is a unique approach that we have developed based on the extensive experience of our core retail team and is an opportunity for CTM to provide our guests with an additional level of compassionate service that defines our company.

Follow-up online appointments are a free service offered to any guest that would like to connect

with a consult specialist to review their treatment regimen, assess any recent reactions or changes in treatment indications, ensure proper dosing and consumption techniques, and assist in revising their treatment if necessary. Our specialists are fully versed in each of these areas and we firmly believe in providing additional guidance outside a retail setting to any guest who makes a purchase at our location.

In our experience, many guests do not wish to discuss their cannabis treatment options while they are in our retail facility. Even though CTM does everything we can to make our guests comfortable by offering private consultations, we find that some guests are still wary of openly discussing treatments. With our online consultations, guests can discuss their care from the privacy of their own home and CTM can offer yet another safe and confidential method to counsel guests on the most appropriate treatment.

All of our dispensary agents are well-trained and CTM takes care to identify employees that display a passion for private consultative care. All of our staff are trained on various uses of cannabis as well as safe dosing practices, and we realize that consultation is a more in-depth, personal, and engaging part of our guest services. We comprehensively train our consult staff based on the extensive feedback that we have received from our patients and guests on their experience with cannabis products. CTM staff also understands that there are no absolutes when recommending cannabis treatment and we will always educate our guests that cannabis therapy can often be a process of trial and error. Should a guest come in with advice from their doctor, a CTM employee will always adhere to the advice of the medical professionals. Our role is to facilitate the best treatment and CTM is dedicated to educating our guests whenever they have questions or concerns.

Furthermore, our treatment philosophy is based on the importance of titrating - which is nothing more than slowly moving up or down a dosing scale. CTM is well-versed in advising guests on the benefits of 'low and slow' dosing to achieve the appropriate therapeutic range. Our strong belief in titrating extends throughout our retail operations, where all of our dispensary agents are trained to encourage the purchase of small amounts of cannabis to ensure that guests are able to accurately determine the correct dose, as well as the best product for their treatment.

RETURNS

While CTM takes every precaution to ensure that we provide the right product for our guests and patients, we realize that some products just don't work for everyone. Even with the best of intentions, results may vary from person to person. At CTM, we will always do the right thing for our guests. Along with the original receipt, we will exchange any marijuana product for an adult use guest. Since personal information is not stored for adult use, we are unable to offer a credit and therefore, exchanges will only take place the same day a product is returned. If there is an opportunity for CTM to serve registered patients, they may exchange any product that did not have the expected results. However, should the patient choose to use their credit at another time, CTM will place the credit amount in the notes section on the patient's personal profile.

For non-medicated returns, for instance, batteries that are defective, CTM will exchange that item for a new one. For all other accessories, our return policy states that we will ensure that each dispensary agent verbally communicates the return policy for these items, and the customer will be given the manufacturers contact and warranty information along with their receipt.

As part of our policies and procedures, at the final point of sale for any transaction, CTM's dispensary agents will confirm all items ordered are in the exit bag(s). Once payment is received, receipts will be given directly to the guest. Additionally, CTM will have our return policy printed on the back of the receipt, however, we are fully aware that this does not replace printed return policies that we will place throughout the store.

CTM does not give cash back but will provide several options for a replacement, and at no point will our guests ever feel uncomfortable making an exchange.

ODOR MITIGATION

We understand that product odor can occasionally be a concern for residents, neighbors, and surrounding businesses. While odor is typically an issue surrounding cannabis cultivation sites, CTM is proactive in addressing any potential odor concerns to ensure we do not create any adverse impact. For our retail operations, nearly every product is stored in airtight pre-packages and CTM utilizes child-resistant odor-proof exit bags to minimize any risk of odor as guests exit our facility. Additionally, as we are creating a newly constructed retail location, our site will have a brand new and independent HVAC system; allowing us to manage our own air filtration to eliminate odor. CTM will also display signage and remind all guests that state regulations require that customers and patients exit the facility and travel with cannabis products in sealed containers and are not accessible by the driver while driving.

LINES, QUEUING AND CROWD CONTROL

Our proposed 5,180 square foot dispensary, alongside an ever-growing number of dispensaries serving the state, allows for a more than sufficient area to accommodate guests inside our store, even during peak hours. Nevertheless, we do appreciate that special occasions and seasonal retail events require adequate contingency plans to handle additional crowds and lines. For example, grand openings and holiday seasons will typically increase foot traffic for retail establishments. As a result, CTM has developed operations and procedures to handle increased guests during these events, in order to avoid any lines gathering outside of our facility.

First, we will expedite security ID checks to remove bottlenecks within the secure vestibule at the entrance to the facility. During peak periods we will assign a minimum of three agents with ID check scanners to be able to expedite the check-in for pre-order guests, versus our full-service guests, thereby maximizing our occupancy of the retail space and avoid guests waiting outside (CTM will modify this approach based on social-distancing concerns. See below). As guests are checking in or queuing inside waiting to be serviced, we will encourage them to utilize our online order ahead services for future visits. As part of our commitment to educate customers, we intend to distribute

literature and will have dispensary agents present to answer any questions that arise – thereby creating a faster process when customers are making any final decisions or purchases at the final point of sale.

CTM has also developed location-specific policies for communications between our inside and outside team members using two way radios. This increased communication will assist the inside dispensary agents to be better prepared to service each guest and thereby improve the time required to expedite sales. By moving customers through more efficiently, our staff can minimize the amount of people waiting during these peak periods and reduce or eliminate any lines.

During high traffic events, such as a grand opening, CTM recognizes our efforts to expedite service may not be sufficient to completely avoid outside queuing. At no point in time will the manager on duty, along with security, be unaware of store capacity. Management and security will determine when to establish outside queuing if they believe that retail floor will reach capacity. Utilizing the benefit of our corner space of the Cloverleaf Mall, and by using the sidewalk along the east side of the mall, we will establish an orderly and non-disruptive outside queue if necessary. CTM will also utilize technology to encourage guests to virtually queue by asking guests for their mobile phone numbers and texting them when there is availability to enter the store. We will encourage guests to visit the other retail options at the Coverleaf Mall during their wait time.

CTM is committed to avoiding any disruption to our neighbors. In the unlikely event that a crowd becomes unmanageable, our security staff will be instructed to simply turn away guests by informing them that we are at capacity and asking them to return at a less busy period. CTM is working with local vendors to provide our Natick retail facility with specialty pieces of non-medicated chocolates or other non-infused treats that we can give to guests we have to temporarily turn away.

We will also coordinate with the Cloverleaf Mall landlord on high traffic event dates to arrange a designated waiting space in the southeast corner of the parking lot. Once there is room to accommodate more people, CTM's security would bring those guests over in small groups. We believe that these occasions may truly be once per year - such as April 20th or during our grand opening - but CTM will have strict policies and procedures in place to avoid any crowd interruptions. Over many years Finard Properties has worked closely with Brian Lauzon from the Natick Police Department on public safety related matters. CTM would continue this working relationship when preparing for any of these types of high traffic event dates.

Finally, another benefit of our proposed site is the availability of 645 total parking spaces. CTM cannot envision any event where there would be insufficient parking or an opportunity for our staff to mitigate any potential traffic issues, should they arise.

COVID-19 RESPONSE

CTM realizes that social distancing is currently the new norm in all retail operations. While we do not know how this will impact us in the coming months or years, we are actively preparing for

long-term enforcement of these procedures. For guests inside our location, we are planning a unique and creative way to delineate the floor at distances of 6' apart, such as the artificial grass from our park theme, in all of our queuing areas (i.e., full-service, express, and in our gallery of educational displays). This will provide an appealing and welcoming experience while ensuring that guests and patients are properly distanced. In addition, the greeters and floor staff will encourage separation amongst our guests while inside the retail space. Given the size of the proposed store, CTM is confident there is enough physical space to maintain social distancing while providing the exceptional retail and educational experience we offer to all of our guests.

Recently, the CCC has authorized the use of curbside pickup as a way to ensure the safety of guests and employees of medical and adult-use dispensaries. For any potential curbside pickup, CTM will process orders online and guests will provide a one-hour window of available pick up times. The order will be prepared in advance, and when the guest arrives, a parking lot attendant will notify (via radio or other electronic method) a dispensary agent. Once appropriately greeted at a safe, social distance, the guests photo identification will be scanned and confirmed, a debit card will be taken for payment, and using proper PPE, an employee will hand the order and receipt to the guest. The dispensary agent will utilize our employee only entrance to help minimize social distancing concerns with guests entering the front door.

These procedures are subject to change with the ever-evolving COVID-19 crisis, but CTM is actively preparing our facility to quickly respond to public health regulations and guest concerns. In fact, CTM has created preliminary guidelines for continued social distancing procedures and will update these as further public health priorities are identified throughout the build-out and opening of our facility.

CTM is committed to the following social distancing procedures:

- Our facility will utilize available methods to denote 6-foot separation spacing between guests and will assign dedicated staff to maintain safe distancing
- CTM will only use 40% of the allowed occupancy in-store during the crisis
- CTM will restrict sales to in-state customers only
- CTM will direct customers to curbside and online ordering with assigned time slots for pick up to minimize in-store occupancy
- All guests will be required to wear masks and gloves inside the facility
- CTM will provide and direct staff to wear PPE to minimize exposure
- CTM will clean all high traffic service areas every 30 mins
- CTM staff will closely monitored for wellness including daily check-ins and temperature checks
- CTM employees will be directed to stay home if they feel sick or are displaying symptoms. Employees that stay home due to illness will be paid their regular rate

VISITORS

As the cannabis business grows in popularity, we must recognize that our facility will need to accommodate visitors without obstructing daily retail activities. All visitors, such as vendors, media, or public officials, must have management approval in advance, must have scheduled appointments for their visit so that security is aware of their presence in advance, and each individual in attendance must produce a valid photo identification to be scanned or copied and retained in a separate log book. The log will contain the name of the visitor, the date they arrived, their employer, the reason for their visit, their signature, a record of which CTM employee is escorting during their visit, as well as the time they arrived and exited the premises. Visitors will be required to wear a Visitors Badge during the entire duration of their visit. Visitors will be strictly prohibited from entering all limited access zones unless previously authorized by retail management. Upon exiting, CTM security will collect the visitor badge and record the time that the visitor exited the facility. CTM's visitor log will contain no less than 30-days of records and will remain at the designated check-in desk. Our Director of Security will audit the logs to ensure employees responsible for maintaining the log are adhering to this policy and procedure. All hard copy logs over 30-days will be considered archived and be kept in the security office for 3 years, while soft copies will be stored on our secure server for management and security access only.

Retail Dispensing Operating Policies and Procedures

FOR CANNABIS CONTROL COMMISSION SUBMISSION

935 CMR 500.140

CTM is experienced in operating collocated adult use and medical use locations, and pursuant to 935 CMR 500.140(3), upon entry into the premise of CTM by an individual, a CTM agent shall immediately inspect the individual's proof of identification. An individual shall not be admitted to the premise unless the retailer has verified that the individual is 21 years of age or older by offering proof of identification. Acceptable proof of identification is limited to:

- Massachusetts Issued driver's license
- Government Issued Identification Card (with photo)
- Passport
- U.S. Military I.D.
- A Massachusetts License to Carry a Firearm card
- A patient registration card is not sufficient proof of age
- All ID's must contain the following: Name, Photograph, Date of Birth & Expiration Date

If the patient, caregiver or customer does not have a valid ID or for any reason the identity of the patient, caregiver or consumer, or the validity of the ID is in question, they will not be allowed to enter the facility.

CTM reserves the right to refuse to sell marijuana products to a consumer if, in the opinion of the CTM agent based on the information available to said agent at that time, the consumer or the public would be placed at risk, in accordance with 935 CMR 500.140(5)(b). In accordance with M.G.L. c. 94G, §7, and 935 CMR 500.140(5)(c), CTM will not sell more than one ounce of marijuana or five grams of marijuana concentrate to a consumer per day. Or the combination of flower and MIP's (marijuana infused product). Additionally, CTM understands the prohibition on selling marijuana products containing nicotine and the prohibition on selling marijuana products containing alcohol, if sales of such alcohol would require licensure pursuant to M.G.L. c. 138.

All products sold to customers will meet the requirements of 935 CMR 500.105(5) (a)-(d) addressing labeling of marijuana, marijuana products, edible marijuana infused products, marijuana concentrates and extracts, and marijuana infused tinctures and topicals. Each label will include, but not be limited to: name and registration of marijuana cultivator and/or product manufacturer; the name of the product; quantity of usable marijuana; type of marijuana used in the product; directions for use of the marijuana if relevant; and a symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana

product. All adult-use edible products have a 5mg dosing limit per serving, clearly marked and includes insignia. Maximum of 20 servings per package. Any product that does not meet these requirements are not available for adult-use sales.

A separate point of sale system will be in place for patients (non-taxed) and adult use patrons (taxed). CTM will only use a point-of-sale system that has been approved by the Commission, in consultation with the DOR. Pursuant to 935 CMR 500.140(7) CTM shall provide for physical separation between medical and adult use sales areas. Separation will be provided by a temporary or semi- permanent physical barrier, such as a stanchion, that, in the opinion of the Commission, adequately separates sales areas of marijuana products for medical use from sales areas of marijuana products for adult use. CTM shall provide for separate lines for sales of marijuana products for medical use from marijuana products for adult use within the sales area, provided, however, that the holder of a medical registration card may use either line and shall not be limited only to the medical use line. CTM will provide an area that is separate from the sales floor to allow for confidential consultation. Pursuant to 935 CMR 500.140(10), CTM will maintain a 35% patient supply reserve of the RMD's marijuana products, exclusively for patients registered under 105 CMR 725.000 if the retail location is licensed prior to CTM receiving its adult-use cultivation and processing and manufacturing license from the Commission.

At the point of sales, consumers will again present their proof of identification to the Sales Agent to verify the consumers age before the transaction is processed. Additionally, patients and caregivers must present their patient/caregiver Commission issued ID card and 2nd form of identification. The sales Agent will process the transaction through the POS system and also the Commissions interoperable database (MASSCIportal).

CTM will not utilize software or other methods to manipulate or alter sales data in compliance with 935 CMR 500.140(5)(c). CTM will conduct a monthly analysis of its equipment and sales data to determine that no software has been installed that could be utilized to manipulate or alter sales data and that no other methodology has been employed to manipulate or alter sales data.

CTM will maintain records that it has performed the monthly analysis and produce it upon request to the Commission. If CTM determines that software had been installed for the purpose of manipulation or alteration of sales data or other methods have been utilized to manipulate or alter sales data we will: disclose the information to the Commission; cooperate with the Commission in an investigation relative to data manipulation; and take other action as directed by the Commission to comply with the applicable regulations.

CTM will employ separate accounting practices at the point-of-sale for marijuana and marijuana products sales, and non-marijuana sales, in accordance with 935 CMR 500.140(6)(f). CTM understands that the Commission and the Department of Revenue may audit and examine the point-of-sale system used by CTM in order to ensure compliance with Massachusetts tax laws and 935 CMR 500.000. Pursuant to 935 CMR 500.140(5)(b), CTM may utilize a sales recording module that has been approved by the Department of Revenue. As a collocated retailer CTM will maintain and provide to the Commission on a biannual basis accurate sales data collected by the

licensee during the 6 months immediately preceding this application for the purpose of ensuring an adequate supply of marijuana and marijuana products under 935 CMR 50.140(10).

Pursuant to 935 CMR 500.140(8) CTM will make available educational materials about marijuana products to consumers. CTM will ensure an adequate supply is available and offered in commonly utilized languages, including appropriate materials for the visually and hearing impaired. CTM will have these materials available to the Commission for inspection upon request. The educational material, at a minimum, will include: 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, emphasizing the use of the smallest amount and explaining potency of the products; A discussion of tolerance, dependence, and withdrawal; (g) 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.

LABELING OF MARIJUANA/ MARIJUANA PRODUCTS

All marijuana flower and marijuana infused products (MIP) will have a legible label affixed to every package. All marijuana flower labels will be the same size and all (MIP) labels will be the same size with a recognized symbol that states: KEEP THIS PRODUCT AWAY FROM CHILDREN. Child resistant packaging, capable of being resealed and made child resistant, will be used and certified by an independent third party.

In strict accordance with the provisions of 935 CMR 500.105 (11) CTM shall label all marijuana or marijuana infused products with a firmly affixed label on which the wording is no less than 1/16 inch in size on each container of the product that CTM prepares for retail sale, containing at a minimum the following information:

1. The name and registration number of the Marijuana Product Manufacturer that produced the Marijuana Product, together with the Marijuana Product Manufacturer's business telephone number, e-mail address, and website information, if any;
2. The Marijuana Product's identity;
3. The type of Marijuana used to produce the product, including what, if any, processing technique or solvents were used;

4. A list of ingredients, including the full Cannabinoid Profile of the Marijuana contained within the Marijuana Product, including the amount of delta-nine-tetrahydrocannabinol (Δ 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;
5. Net weight or volume as expressed in US customary units or metric units;
6. The date of product creation;
7. A batch number, sequential serial number, and bar code when used, to identify the batch associated with manufacturing and processing;
8. Directions for use of the Marijuana Product;
9. 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;
10. A warning if nuts or other Known Allergens are contained in the product; and
11. 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 harm. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN."

Research Process and Procedures

CTM is not seeking to obtain a Marijuana Research Facility license as defined by CMR 500.050(11) and will not conduct research related to marijuana products at our proposed Natick facility.

While this section of the RFI does not specifically apply to CTM, we believe that the cornerstone of any successful relationship with the Town of Natick is rooted in the public commitments that we make to the community. Although we do not seek this type of cannabis license and will not conduct this activity, CTM is committed to sourcing all of our cannabis products with the utmost care by relying on the most up to date medical science and research.

Our guests, neighbors, and the entire Natick community can be assured that our team is dedicated to maintaining the highest levels of quality and safety, and CTMs products are rooted in the most recent and cutting-edge medical science available in the cannabis industry.

Testing Process and Procedures

Summary

CTM is not seeking a testing license in the Town of Natick. However, all products sold by CTM will be fully compliant and tested product as required by 934 CMR 500.160. CTM's first priority is the safety of our guests, employees, and communities. We will never sell or market any product that has not been tested by an independent laboratory, and we will never accept any product that could be in violation of health and safety protocols.

CTM's rigorous review of tested products and storage procedures are in place to ensure that our guests receive the high-quality product at the exact specifications that they desire. We know from our experience in the industry that the existing stigma around cannabis has forced many potential patients, especially veterans, to forgo the relief offered by medicinal marijuana treatment. As a result, many guests are driven to the adult-use market as a way to avoid stigma and to purchase cannabis as a therapeutic solution, instead of registering for a medical treatment card.

Adult-use retailers thus become the market of last resort for guests that require care and we must be supremely diligent in how we perform quality control, testing, and certification of our products.

The products we provide are free of any contaminants and are stored in separate, sanitary storage area to maintain their safety. Providing a sanitary environment for our products is a paramount concern for CTM dispensary agents given that the vast majority of our inventory is flower or flower-based cannabis, and therefore must be maintained in a controlled, clean, and regularly sanitized environment for optimal storage and quality.

All of CTMs products are subject to a thorough third-party testing procedure and all edible cannabis items are produced under good manufacturing practices and safe practices for food handling. We understand that nothing else is more important to the experience of our guests than the safety and accuracy of the products they obtain from our retail facilities, and we require that all of our dispensary agents be trained in the exacting standards we have in place to ensure our guest expectations are being met in every instance.

Testing Operating Policies and Procedures

FOR CANNABIS CONTROL COMMISSION SUBMISSION 935 CMR 500.160

Pursuant to 935 CMR 500.160, CTM will not sell or market any marijuana product that is not capable of being tested by Independent Testing Laboratories, including testing of marijuana products and environmental media. CTM will implement a written policy for responding to laboratory results that indicate contaminant levels that are above acceptable levels established in Massachusetts Department of Public Health protocols identified in 935 CMR 500.160(1) and subsequent notification to the Cannabis Control Commission of such results. Results of any tests will be maintained by CTM for at least one year. All transportation of marijuana to or from testing facilities shall comply with 935 CMR 500.105(13) and any marijuana product returned to CTM by the testing facility will be disposed of in accordance with 935 CMR 500.105(12). CTM will never sell or market adult use marijuana products that have not first been tested by an Independent Testing Laboratory and deemed to comply with the standards required under 935 CMR 500.160.

In accordance with 935 CMR 500.130(2), CTM will prepare, handle and store all edible marijuana products 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. In addition, CTM'S policies include requirements for handling of marijuana, pursuant to 935 CMR 500.105(3), including sanitary measures that include, but are not limited to: hand washing stations; sufficient space for storage of materials; removal of waste; clean floors, walls and ceilings; sanitary building fixtures; sufficient water supply and plumbing; and storage facilities that prevent contamination.

Pursuant to 935 CMR 500.105(11)(a)-(e), CTM will provide adequate lighting, ventilation, temperature, humidity, space and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110. CTM will have a separate area for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, unless such products are destroyed. CTM storage areas will be kept in a clean and orderly condition, free from infestations by insects, rodents, birds and any other types of pests. The CTM storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.

CTM has a Quality Manager who will oversee the manufacturing at the CTM facility to maintain strict compliance with DPH regulations and protocols for quality control and analytical testing. In accordance with 935 CMR 500.160 CTM

grow areas are monitored for temperature, humidity, and CO2 levels. This monitoring helps reduce the risk of crop failure. Ethical pest management procedures are utilized to naturally maintain a pest free environment alongside our True Living Organics (‘TLO’) growing method.

All Marijuana Infused Products (“MIPs”) are produced using good manufacturing practices and safe practices for food handling to ensure quality and prevention of contamination.

All CTM agents whose job includes contact with marijuana or nonedible marijuana products is subject to the requirements for food handlers specified in 105 CMR 300.000: Reportable Diseases, Surveillance, and Isolation and Quarantine Requirements. All CTM agents working in direct contact with preparation of marijuana or nonedible marijuana products shall conform to sanitary practices while on duty, including personal cleanliness and thorough hand-washing.

The hand-washing facilities will be adequate and convenient with running water at a suitable temperature and conform with all requirements of 935 CMR 500.105(3)(b)(3). CTM will provide sufficient space for placement of equipment and storage of materials as is necessary for the maintenance of sanitary operations, in accordance with 935 CMR 500.105(3)(b)(4). Litter and waste will be properly removed and disposed of and the operating systems for waste disposal shall be maintained in an adequate manner pursuant to 935 CMR 500.105(12). The floors, ceilings and walls will be constructed in a way that allows them to be adequately cleaned and in good repair. All contact surfaces, including utensils and equipment, shall be maintained in a clean and sanitary condition in compliance with 935 CMR 500.105(3)(b)(9). All toxic items shall be identified, held, and stored in a manner that protects against contamination of marijuana products.

Pursuant to 935 CMR 500.105(3)(b)(11), CTM’s water supply will be sufficient for necessary operations to meet our needs. The plumbing requirements of 935 CMR 500.105(3)(b)(12) will be met through adequate size and design and adequately installed and maintained to carry sufficient quantities of water to required locations throughout the CTM facility. CTM will also provide our employees with adequate, readily accessible toilet facilities that are maintained in sanitary condition and in good repair. All products that can support the rapid growth of undesirable microorganisms will be held in a manner that prevents the growth of these microorganisms.

Our quality assurance manager will ensure all batches of Marijuana and MIPs will be tested, by an independent testing laboratory pursuant to 935 CMR 500.160. All products shall be tested for the cannabinoid profile and for contaminants as specified by the Department, including but not limited to mold, mildew, heavy metals, plant-growth regulators, and the presence of pesticides.

Environmental media will be tested in compliance with the Protocol for Sampling and Analysis of Environmental Media for Massachusetts Registered Medical Marijuana Dispensaries published by the Department of Public Health pursuant to 935 CMR 500.160(1). All testing results will be maintained by CTM for no less than one year in accordance with 935

CMR 500.160(3).

Samples that pass testing will be packaged for use or utilized in MIPs.

Samples that fail testing will be reported and destroyed. Pursuant to 935 CMR 500.160(9), no marijuana product shall be sold or marketed for sale that has not first been tested and deemed to comply with the Independent Testing Laboratory standards.

Record Keeping and Maintenance of Financial Records Procedures

Summary

CTM recognizes the importance of closely monitoring all aspects of our cannabis products, including the current inventory as well as all financial, personnel, and disposal records associated with our proposed Natick location.

In order to preserve the safe operation of our facility and the health and safety of our employees, guests, and neighbors, CTM will employ real-time tracking systems for the delivery, receipt, and storage of all cannabis products. We will also ensure that all personnel records and financial records are accurately recorded, well-maintained, and safely protected for review in the event that local, state or regulatory entities may need access to such records.

We believe that our business depends on the accuracy of our records and we place an extremely high value on the competent management and execution of regulatory compliance. Our management, staff, and employees are trained and retrained with the intention of keeping their knowledge and awareness of regulatory requirements up to date and their execution of those requirements are established and ingrained in our local company culture.

Record Keeping and Maintenance of Financial Records Operating Policies and Procedures

FOR CANNABIS CONTROL COMMISSION SUBMISSION 935 CMR 500.105

CTM records will be available to the CCC upon request pursuant to 935 CMR 500.105(9). The records will be maintained in accordance with generally accepted accounting principles. All written records required in any section of 935 CMR 500.000 are subject to inspection, in addition to written operating procedures as required by 935 CMR 500.105(1), inventory records as required by 935 CMR 500.105(8) and seed-to-sale tracking records for all marijuana products are required by 935 CMR 500.105(8)(e).

Personnel records will also be maintained, in accordance with 935 CMR 500.105(9)(d), including but not limited to, job descriptions for each employee, organizational charts, staffing plans, personnel policies and procedures and background checks obtained in accordance with 935 CMR 500.030. Personnel records will be maintained for at least 12 months after termination of the individual's affiliation with CTM, in accordance with 935 CMR 500.105(9)(d)(2). Additionally, business will be maintained in accordance with 935 CMR 500.104(9)(e) as well as waste disposal records pursuant to 935 CMR 500.104(9)(f), as required under 935 CMR 500.105(12).

Following the closure of the Marijuana Establishment, all records will be kept for at least two years at the expense of CTM and in a form and location acceptable to the Commission, pursuant to 935 CMR 500.105(9)(g).

Inventory Policies and Procedures

Real time inventory will be maintained as specified by the Cannabis Control Commission and in accordance with 935 CMR 500.105(8). Inventory will be taken daily, and any time products are moved from their pre-existing location, CTM will maintain real-time inventory and tracking procedures in compliance with 935 CMR 500.105. Any discrepancies discovered when conducting inventory will be reported to the inventory manager on the same day.

Pursuant to 935 CMR 500.105(8)(f), no marijuana product, including marijuana, will be sold by CTM or marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

Marijuana infused products and flower inventory will be tracked and managed in the seed-to-sale tracking system and all product will be stored in the vault. Product will be listed on a manifest for transport, and upon arrival at the dispensary, inventory will be managed through the seed-to-sale tracking system utilizing the virtual separation of products required under 935 CMR 500.105(8)(g).

CTM will also keep all waste disposal records as required by 500.105(12), including record keeping procedures. CTM will ensure that at least 2 Marijuana Establishment Agents witness and document how the marijuana waste is disposed or otherwise handled in accordance with 935 CMR 500.105(12). When the marijuana products or waste is disposed or handled, CTM will create and maintain a written or electronic record of the date, the type, and quantity disposed or handled, the manner of disposal or other handling, the location of the disposal or other handling, and the names of the Agents present during the disposal or handling, with their signatures. CTM will keep these records for at least 3 years.

Qualifications of All Close Associates with Managerial or Operational Control

CTM is a local company with a straightforward vision to invest in the communities of Massachusetts, maintain strong local ties, and create meaningful partnerships with municipalities, local organizations, and community members.

We understand that many of the Commonwealth's municipalities have seen large, multi-national cannabis companies attempt to corner the market in their neighborhoods and commercial areas. Our founders and our employees take a very different approach to our relationships with cities and towns.

CTM puts communities first.

We are natives to this area, and we are very proud of the deep history we have with the Town of Natick. We believe in making direct investments in the cities and towns that we partner with. We believe in hiring locally and promoting from within. We believe in providing the best-in-class service not just for our guests, but for every member of the Natick community. And we believe in continuously improving our local partnerships in order to respond directly to the needs of the community.

CTM is driven by these values and we have assembled an exceptional team with the experience and knowledge to fully implement our vision while also delivering the outstanding service that distinguishes our company. CTM is proud to present a brief summary of each our team member's qualifications as well as the attached resumes to help provide a full picture of our individual credentials.



Victor Chiang (Board of Directors and CEO) began his career by spending 12 years at Andersen Consulting/Accenture's Boston office where he was focused on management and IT consulting in the Financial Services practice. During his tenure Victor's major clients included Fidelity Investments, John Hancock, Royal Bank of Canada, American Express, Ameriprise, and Barclay's Capital. Victor then spent 11 years as a co-founder, Chief Operating Officer, Chief Compliance Officer and Investment Committee Member of Balter Capital Management, a Boston based hedge fund boutique that had several hedge funds and mutual fund products, and a hedge fund advisory service, with peak assets of \$1.4B. As the Chief Operating Officer, he was responsible for the firm's product manufacturing, managing all third-party vendors, investor relations, and managing all of the non-fund raising and investment operations and HR for the firm. Victor held one of the three investment committee votes with the only voting right to unilaterally reject an investment for operational risks. Victor left BCM in 2016 to co-found Cypress Tree Management. Victor has been its full-time CEO since then, and has fully immersed himself in the MA cannabis market. Victor is a board member of the MA Cannabis Business Association, an organization dedicated to the responsible growth of the cannabis industry in Massachusetts. Outside of work, Victor volunteers with the Dana-Farber where he co-chairs an annual golf tournament and has helped raised over \$1.3MM in total giving. Victor grew up in Weston, MA and currently lives in Wellesley, MA with his family.



Todd Finard (Board of Directors) is Chief Executive Officer of Finard Properties. In the 25 years that Todd has been involved in the world of real estate development, he has become an active leader in the communities in which the company is present. Most recently, Todd worked in his capacity as a Board Member at Hebrew SeniorLife to support the COVID-19 Senior Response Fund, which has raised over \$1,000,000 since the pandemic began. Hebrew SeniorLife is the largest geriatric care provider in New England and a Harvard Medical School affiliate with seven senior care centers throughout MA, and is a charity Todd is passionate about having served as a past Chairmen of the Board. Separately, as a founder of the Combined Jewish Philanthropies Next Generation Housing Corporation and worked with several close friends to create a housing platform for adults with disabilities in the Boston area. Currently, Todd serves as the Chairman of the Board of Advisors for the School at the Museum of Fine Arts at Tufts University, his alma mater. Additionally, Todd is the Chairman of the PBCC Scholars Foundation, a 501C3 which makes educational grants and supports local community partners in the Weston area. Professionally, Todd has worked on the development of shopping centers, hotels and office properties in Massachusetts, Maine, Rhode Island, Vermont and Tennessee. Todd grew up in, and continues to reside in Weston, MA with his family.



Eric Liebman (Board of Directors) has spent over 20 years working in real estate both in the Boston area and New York. Eric spent 8 years working in manufacturing and retail for a family run business with offices in Boston, Hong Kong and China, where their customers were major big-box retailers. Prior to that, Eric was involved in the initial launch of the Boloco restaurant group as an equity holder and was instrumental in open the first store in Fenway (steps from our proposed Fenway retail site). Eric grew up in Brookline, MA and currently lives in Somerville, MA.



Lisa Burke (Director of Retail) has been a part of the regulated cannabis market in Massachusetts since its legalization in 2015. She was one of the retail managers at New England Treatment Access' adult-use and medical dispensary in Brookline, MA, overseeing 190 staff members. She was a part of NETA's retail organization since its inception and was an integral part of its growth as the premier operator in the MA cannabis market. The Brookline dispensary is by far the largest revenue generating dispensary in MA which currently services between 2,500-3,200 customers per day. In her role she helped develop and implement all aspects of their retail operations and designed tools to coach and educate staff on regulatory compliance. She brings a deep cannabis knowledge and experience in educating and servicing both experienced and new cannabis users. Lisa also recognizes the importance of diversity and being part of a neighborhood that embraces retail cannabis for community outreach. Lisa spent several years being a big sister to Vickie, a special needs individual through the Jewish Big Brothers, Big Sisters Friend to Friend Program. She has two children and lives in Newton MA.



Adelheid Teutsch (Chief Compliance Officer) was the Acting Director of Compliance and Investigations for the MA Medical Use of Marijuana Program. There she played an integral role in building the marijuana industry for MA through her regulatory oversight position. Through this experience Adelheid brings exceptional knowledge on all state regulations and the direct expertise of building and operating fully compliant organizations. Prior to her role as Acting Director of Compliance and Investigations, Adelheid had specialized training in firefighting, including but not limited to; fire suppression, rescue operations, hazmat operations and infectious control. She has over a decade of experience and training in law enforcement, of which she was part of a specialized multi-jurisdictional unit for narcotic's investigations. She is currently the CEO of T420 Consulting, where they specialize in all phases of build out for hemp and marijuana companies to ensure compliance in both the recreational and medical marijuana fields. She has an undergraduate degree in Sociology with a concentration in Anthropology (physical and cultural) from MCLA, a master's degree in criminal justice from Westfield State University and is currently enrolled at Massachusetts School of Law.



Becky Dempsey (Director of Education and Wellness) is a single mom of three children. Becky started researching alternative therapies after her oldest son was diagnosed with autism, and she with lupus back in 2007. Becky's commitment to finding non-toxic solutions to medications, and their significant side effects, led her to cannabis. Diving into educational courses about cannabis and its benefits, she learned how to manage her lupus symptoms, and help support her son's anxiety. She started a "special moms" support group as a way to stay connected to those with the same needs as her son. The mothers who have children with special needs share resources and information during their time together. Becky is certified in Patient Services, with a focus on cannabis education, dispensing, and wellness. Becky grew up and continues to reside in Weston, MA with her 3 children.



Rick Nagle (Director of Security) worked in Massachusetts law enforcement for over 30 years. He spent 10 years as an investigator for both the Norfolk County and Plymouth County District Attorneys’ offices, before being assigned to the Commonwealth’s Cold Case Unit. He then became a supervisor in the State Police’s Crisis Management office, and then was promoted to Narcotics Inspector with the Massachusetts State Police. His duties included being responsible for all narcotic evidence seized by the Massachusetts State Police. Rick was also in charge of reviewing and developing security policies and procedures for the State Police. At CTM, Rick will be developing policies and procedures relative to interior and exterior security of the CTM facilities. Rick will also be actively involved in hiring and training all security personnel.

Suitability Certification

Our local roots are what makes CTM unique in the Massachusetts cannabis industry.

For each of our founding partners, having grown up just a few minutes away, the Town of Natick is an important part of our lives, our family histories, as well as the daily lives of our family members.

As a company, we are singularly focused on investing in the communities that are important to us, to our employees, and to the cannabis industry. With a nearly sixty-year history in Natick, we are eager to build this new partnership with an even deeper commitment to the town and its residents.

To that end, we believe that any partnership must be built, first and foremost, with integrity. Much like the cooperative relationship established between our founding partner, Todd Finard, the 9/27 Shopping Plaza and the Town of Natick, we see the dimensions of CTM's partnership with Natick stretching far beyond the four walls of our facility. We aim to be not only a reliable and contributing member of this community, but also one that is responsive and respectful of the town's needs.

In fact, all of our founding partners still live within just few miles of Natick and we consider ourselves an indispensable part of the retail team – available to the Town of Natick at a moment's notice. Our facility will have a phone number that will connect town leaders, neighbors, emergency services, and residents to our CTM team 24 hours a day, 7 days a week.

As cannabis legalization has rolled out over the Commonwealth, we understand that some residents may still have questions about this new and emerging industry. We are confident that the best way to address and alleviate these concerns is for every community to know who they are partnering with and know that their partner will continue to work with community members to address any concerns that may arise. CTM is uniquely positioned to build upon its existing history with Natick and our founding partners know the extraordinary value of making an investment in the town, along with the importance of a deep working relationship with its residents and community leaders.

Furthermore, the Town of Natick will have the direct contact information for our founding partners, who can show up within minutes to address any concerns. We offer this as service that we understand is far beyond the capabilities of other larger companies. Our business is personal to us and we want the Town of Natick to fully understand our commitment to making this a successful partnership for years to come.


To the extent that we can be of further service to the Town of Natick and its residents, we welcome the opportunity to partner and continue our long and productive relationship with the integrity we have demonstrated throughout our company's history. CTM's founding members have voluntarily submitted to extensive background checks and submitted those for verification with the Cannabis Control Commission (CCC) when applying for medical and adult use provisional licenses in Newton, Massachusetts. The CCC has not returned any comments on those background checks. We understand that the integrity of our business, and those who work in it, is critical to our relationship with the town of Natick and to the ongoing trust we are establishing with our neighbors. We recognize this as a cornerstone to building our business and for those reasons, we have attached the following attestations to further certify that each of our founding partners have not committed any offense(s) that would result in a presumptive negative suitability determination under 935 CMR 500.802 Tables B-D.

AFFIRMATION

I, Victor Chiang, Chief Executive Officer of Cypress Tree Management, Inc., and Cypress Tree Management Natick, Inc., acknowledge, understand, and affirm that the following information is accurate to the extent that I am aware upon my knowledge, information, and belief:

As a person having direct or indirect control of the proposed marijuana establishment in the Town of Natick, I have not committed any offense(s) that would result in a presumptive negative suitability determination under 935 CMR 500.802 Tables B-D

Signed under the pains and penalties of perjury on
this 15th day of April, 2020

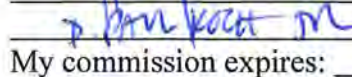


Victor Chiang
Chief Executive Officer
Cypress Tree Management, Inc.
Cypress Tree Management Natick, Inc.

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

On this 15 day of April, 2020, before me, the undersigned notary public, personally appeared Victor Chiang, proved to me through satisfactory evidence of identification, which was MADL or Known to Me, to be the person whose name is signed on the preceding or attached document, and acknowledged to me that he signed it voluntarily for its stated purposes.



_____, Notary Public
My commission expires: 25 JUL 25



AFFIRMATION

I, Todd Finard, Member of the Board of Directors of Cypress Tree Management, Inc., and Cypress Tree Management Natick, Inc., acknowledge, understand, and affirm that the following information is accurate to the extent that I am aware upon my knowledge, information, and belief:

As a person having direct or indirect control of the proposed marijuana establishment in the Town of Natick, I have not committed any offense(s) that would result in a presumptive negative suitability determination under 935 CMR 500.802 Tables B-D

Signed under the pains and penalties of perjury on this 15th day of April, 2020



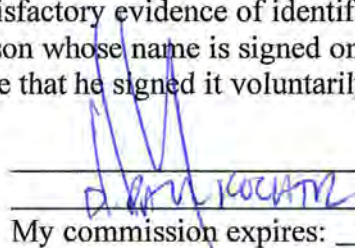
Todd Finard
Board of Directors
Cypress Tree Management, Inc.
Cypress Tree Management Natick, Inc

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

On this 15 day of April, 2020, before me, the undersigned notary public, personally appeared Todd Finard, proved to me through satisfactory evidence of identification, which was MADL or Known to Me, to be the person whose name is signed on the preceding or attached document, and acknowledged to me that he signed it voluntarily for its stated purposes.



 , Notary Public
My commission expires: 25 JUL 25

AFFIRMATION

I, Eric Liebman, Member of the Board of Directors of Cypress Tree Management, Inc., and Cypress Tree Management Natick, Inc., acknowledge, understand, and affirm that the following information is accurate to the extent that I am aware upon my knowledge, information, and belief:

As a person having direct or indirect control of the proposed marijuana establishment in the Town of Natick, I have not committed any offense(s) that would result in a presumptive negative suitability determination under 935 CMR 500.802 Tables B-D

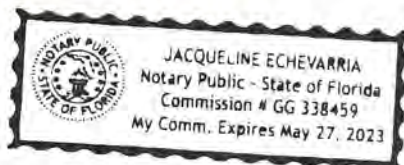
Signed under the pains and penalties of perjury on this

28 day of APRIL, 2020



Eric Liebman
Board of Directors
Cypress Tree Management, Inc.
Cypress Tree Management Natick, Inc.

State of Florida
County of Miami Dade
The foregoing instrument was acknowledged before me this 28 day of April (month), 2020 (year), by Eric M. Liebman (name of person acknowledging).
Personally Known _____ OR Produced Identification ☒
Type of Identification Produced: U.S. Passport
Jacqueline Echevarria Notary's Signature
Jacqueline Echevarria Notary's Name (printed, typed, or stamped) (Seal)



Disclosure of Ownership Interest

Victor Chiang, Todd Finard, and Eric Liebman are the majority owners of CTM.

Cypress Tree Management, Inc. has a licensed dispensary at 24-26 Elliot Street in the City of Newton with all of the required approvals from the City, as well as the Provisional Certificate of Registration from CCC. We anticipate opening the Newton facility in the late Fall of 2020 dependent on understandable delays due to the ongoing COVID-19 health crisis.

Victor Chiang, Todd Finard, and Eric Liebman are also the majority owners of Cypress Tree Management Fenway, Inc., which has a pending application with the City of Boston for a dispensary at 1114 Boylston Street in the Fenway ward of Boston. Cypress Tree Management Fenway has not yet been awarded a Host Community Agreement or a Special Permit from the City of Boston and as a result, has not submitted an application to the CCC. Cypress Tree Management Fenway also anticipates some understandable delay in the decision-making process in the City of Boston due to the ongoing COVID-19 health crisis.

Training Plans for Employees

Summary

CTM is dedicated to nurturing the skills of our employees through ongoing training programs designed to inspire meaningful learning experiences for our diverse and changing workforce. Maintaining an exceptional local business requires that we offer our employees high-quality training that meets our strict standards for a safe and compliant working environment while also providing an outstanding guest experience.

Upon hiring any member of our staff, CTM requires every employee to become a Registered Agent with the CCC. Along with the mandated state CORI and national background checks, we ensure that each team member is properly onboarded through our extensive and value-driven personnel policies to ensure the consistent, fair, and uniform treatment and training of every individual.

As a local company dedicated to recruiting local employees, CTM understands that our dispensary agents are key personnel in our story of success. We conduct comprehensive training programs with all of our dispensary agents in order to bring them the experience they need in customer service, safety, sanitation, and best practices for proper handling.

Among the many training modules that we offer, CTM is particularly proud of the unique emphasis we place on the ideas of empathy and empowerment with our current and future dispensary agents. We know and understand from our years in the cannabis industry that many medical cannabis patients do not register for a medical treatment card (especially veterans) and thus rely on the adult-use market for their medicine.

As a result, many of these individuals arrive at our facilities seeking cannabis treatment as a last resort and are in need of customized care. We recognize that this is a critically important moment in our responsibility as a cannabis provider to offer care, compassion, and access to the best treatment. CTM meticulously trains our dispensary agents to carefully listen, research, and educate our guests on the proper dosage and category of cannabis product they may need to achieve therapeutic results.

We make sure to provide the best training for our dispensary agents with the full understanding that this need for care goes beyond Medicinal-only locations. Our training covers private consultations, educational materials and tools, and a deep focus on educating our guests so they may easily understand their treatment options. All of CTMs dispensary agents receive an employee handbook, both printed and electronic, outlining these and other policies.

Our training will also include, but not be limited to, the following topics:

- Humanitarian Use of Medical Marijuana Act/105 CMR 725.000
- Agent Registration & Self-Reporting
- Cultural diversity, Competency & Interpreter Services
- Compliance
 - » Laws & Regulations
 - » Privacy/Confidentiality
 - » HIPAA
 - » Patients with Disabilities/ADA Compliance
- Medical Marijuana Science
- Community, Patient & Guest Relations
- Law Enforcement Interaction
- Cash Safety Provisions
- Building Security/Diversion Prevention
- Cultivation/Processing Safety & Security
- Manufacturing/Processing MIPs Safety & Security
- Dispensary Safety & Security Protocols (ID Requirements, Purchase Limits, etc.)
- Reasonable Consumption Practices & Consultation Education for Patients & Guests
- Inventory Management and Best Practices on Storage & Protection
- Emergency Protocols, Incident Management & Reporting
- Product Handling/Sanitation, Packaging, Labeling, Testing & Internal audits
- Record Keeping/Reporting, Transportation, Waste disposal

Each agent training is authenticated by signed attestations containing the date, time, and location of the training, as well as those individuals who conducted the training. We recognize that the cannabis industry is a career choice that many individuals want.

In addition, we believe that the strength of our success is the result of our ongoing employee education that stretches beyond the 8 hours of annually mandated training. CTM monitors the progress of our employees through individual observations, group observations, offering real-time feedback, along with testing to ensure accuracy. We role play with each dispensary agent in an engaging and light-hearted way, so they are prepared for various guest scenarios. We believe that the better we train our staff, the greater the retail experience will be for our guests. Retail management also conducts daily check-ins with all of our dispensary agents to ensure they are all completely up to date with any pertinent procedures or policy changes.

An important keystone of any good training program is to recognize that dispensary agents must be able to respond quickly and knowledgeably to changing conditions. CTM's team has a proven track record of developing and implementing new policies and procedures to respond, in real-time, to the changes that come our way. For example, Lisa Burke, CTM's Director of Retail, while leading the largest Adult-Use and Medical dispensary in MA, assisted in designing, developing, and implementing all new procedures and floor workflow as the dispensary transitioned from a medical-only store to serving both adult-use and medical customers. Even the simplest of

workflow of how customers queue had to be redesigned from a single queue to 4 individual lines of Medical, Adult-Use, Medical Reserve Ahead, and Adult-Use Reserve Ahead. This required new procedures to be developed on how staff assist customers and patients, and most importantly, how cannabis inventory is moved from one queue to the other (since Medical patients can purchase Adult-Use and Medical product, while Adult-Use customers cannot purchase Medical products). Lisa was instrumental in developing these needed procedures in real-time and overseeing, as well as training all of the staff to help ensure a smooth retail experience.

Finally, CTM is actively researching and adding policies and procedures to safely respond to the recent coronavirus outbreak and carefully plan for a post-COVID19 environment. We are committed to implementing the most up-to-date information from the Cannabis Control Commission, the Massachusetts Department of Public Health, and the Centers for Disease Control, with the full knowledge and expectation that at any moment we may need to adjust our operations and implement additional safety practices. For example, the development of policies and procedures for curbside pick-up and/or drive through services once Federal and state laws permit such services and the Cannabis Control Commission issues regulatory guidance. Additional training modules will be developed and put into place before any new services are provided to our guests.

Employee Training Operating Policies and Procedures

FOR CANNABIS CONTROL COMMISSION SUBMISSION 935 CMR 500.105

Pursuant to 935 CMR 500.105(2)(a) CTM will ensure all dispensary agents complete training prior to performing job functions. Training will be tailored to the role and responsibilities of the job function. Dispensary agents will be trained for two weeks, and if deemed ready to serve customers, their attestations will be signed and they may be permitted to assume an official role. At a minimum, staff shall receive eight hours of on-going training annually. New dispensary agents will receive employee orientation prior to beginning work with CTM. Each department managed will provide orientation for dispensary agents assigned to their department. Orientation will include a summary overview of all the training modules.

In accordance with 935 CMR 500.105(2), all current owners, managers and employees of CTM that are involved in the handling and sale of marijuana will successfully complete Responsible Vendor Training Program, and once designated a “responsible vendor” require all new employees involved in handling and sale of marijuana to complete this program within 90 days of hire. This program shall then be completed annually and those not selling or handling marijuana may participate voluntarily. CTM will maintain records of responsible vendor training compliance, pursuant to 935 CMR 500.105(2)(b). Responsible vendor training shall include: discussions concerning the effects of marijuana on the human body; diversion prevention; compliance with tracking requirements; identifying acceptable forms of ID, including medical patient cards; and key state and local laws.

All employees will be registered as agents, in accordance with 935 CMR 500.030. All CTM employees will be duly registered as marijuana establishment agents and have to complete a background check in accordance with 935 CMR 500.030(1). All registered agents of CTM shall meet suitability standards of 935 CMR 500.800.

Training will be recorded and retained in dispensary agents file. Training records will be retained by CTM for at least one year after agents’ termination. Dispensary agents will have continuous quality training and a minimum of 8 hours annual on-going training.

Proposed Hours of Operation

In accordance with the recent Draft Rules and Regulations for Adult Use Marijuana Establishment Licenses (Section 8.0), currently being considered by the Natick Board of Selectmen, the hours of operation of any Retail Marijuana Establishment are limited to 9 AM to 9 PM, Sunday through Saturday.

CTM is a locally owned and locally-operated business. Our mission is to hire local talent and help develop long-term, successful careers for our employees in a family-oriented environment.

We believe that the culture of our retail establishments should reflect the culture of those communities that we serve. To that end, we would like to offer alternative hours of operation in our proposed facility that complement Natick’s unique business ecosystem and the nature of our locally-run company.

CTM is proposing the following hours of operations for our facility:

- Monday – Saturday:****9 AM to 9 PM**
- Sunday:****Noon to 6 PM**

Ensuring the Protection of Public Health

CTM founding partners Todd Finard and Victor Chiang grew up in neighboring Weston, Massachusetts, and Eric Liebman grew up in Brookline, Massachusetts. We are lifelong residents of this area and Massachusetts remains our home. Todd lives in Weston, Victor lives in Wellesley, and Eric lives in Somerville. The Town of Natick is an integral part of our lives. Todd owns and operates the 9/27 Shopping Plaza, and his children have been taking golf lessons for years at Kohr Golf. Victor's children learned to swim at Little Flippers, are taking karate at Revolutionary Martial Fitness and golf lessons at Kohr Golf.

Our local roots and our personal commitment to the town have a strong influence on how we approach the health and well-being of every resident, neighbor, and guest of our proposed Natick facility.

As a partner in the community, we believe that it is our job to listen, learn, and act on the recommendations that help us achieve the town's public health priorities. While CTM does have our own companywide values and goals for ensuring the health of the public, as a policy, we are always willing to respond to the identified needs and to follow the leadership of Natick's public health officials.

CTM's efforts must complement those of local experts. As a way to contribute a lasting impact in the Town of Natick, CTM will focus on reducing youth access, educating the public on substance abuse prevention, educating seniors on safe usage, and supporting local charitable efforts to ensure that our company makes meaningful contributions to the health and welfare of the town.

Additionally, it is our sincere hope that town leaders, residents, and other members of the Natick community recognize that we are just beginning our conversation around public health priorities. As the impacts of COVID-19 become more widely understood and retail procedures evolve to a new normal, CTM stands ready to work alongside the Natick community to deliver healthy, safe, and conscientious service to our neighbors, residents, and guests. Natick's commercial businesses are woven into our daily lives and we are personally invested in Natick's continued success.

REDUCING YOUTH ACCESS

In order to curb diversion of cannabis products to youth and young adults, CTM will only sell our pre-rolled cannabis products in packages of three (3), or more. We believe we are the only licensed operator in Massachusetts who has made this commitment.

CTM has chosen to model our program after the success of tobacco cessation programs to markedly reduce youth acquisition rates over the past two decades. Policymakers successfully curtailed youth acquisition of cigarettes by requiring the sale of cigarettes in packs of 20, and by placing higher and higher taxes on those packs.

CTM will replicate this tobacco cessation example in its proposed Natick location as a way to further reduce the diversion of cannabis products to youth. With a higher price point and an increased amount of product, diversion to youth and young adults will be materially constrained and our sincere hope is that we set the example for cannabis retailers statewide to implement these same principles.

Moreover, the sale of pre-rolled cannabis in packages of three or more also discourages public consumption and will reduce incidences of driving under the influence. Much like the ongoing movement in some municipalities to ban miniature bottles of alcohol (or ‘nip’ bottles), the sale of a larger amount of cannabis at a higher price point discourages a single-purchaser from consuming the product either in public or soon after the sale. In fact, many communities who have banned the sale of small bottles of alcohol report fewer instances of public intoxication and fewer arrests for driving under the influence. CTM believes strongly that constraining pre-roll sales can further protect public health and public safety by similarly reducing these negative outcomes in the communities we serve.

CTM also uses child resistant packaging on all products containing marijuana in accordance with state regulations and we will ensure that all labeling of our cannabis products complies with state and local requirements. At the point of sale, we will provide educational materials to patients and guests in an effort to further prevent diversion to youth even after our interaction is complete. In particular, CTM’s literature will highlight the state regulation that consumption is only legal for individuals 21 and older and only in a private residence, and if CTM dispensary agents or security personnel identify any guests providing product to minors, we will ban them from our retail facility.

Our educational materials will also include information on the safe storage of cannabis products to help prevent accidental consumption by minors and will educate our guests on the potential risks of consumption by minors on brain development.

EDUCATING THE COMMUNITY

CTM is fully committed to working with Natick’s Health Department and will establish a significant effort to educate the public that includes, but is not limited to, collaborating on or funding programming related to substance abuse education and prevention, as well as cancer treatment.

In order to establish a meaningful partnership with the Town of Natick, it is our responsibility to address any existing or future health impacts to the surrounding neighborhoods as well as the entire town community. CTM proposes to do so by underwriting further educational programming and workshops within the Town on such topics as promoting safe consumption and the proper dosage of cannabis, as well as the dangers of driving under the influence.

CTM welcomes the opportunity to work with the Town of Natick in offering education for positive impact in the community. For instance, we stand ready to lead programs for educating seniors, veterans, parents and those new to cannabis. CTM has built a team that specifically engages neighborhoods and can answer any question that is raised about the cannabis industry. We also plan to attend town meetings to address areas of impact for residents, but we will focus our efforts

on youth diversion in the town. CTM will partner with the Natick Police Department to hire an officer dedicated to educating students about the consequences of youth consumption.

Furthermore, CTM will distribute educational materials to every guest in our proposed Natick facility to promote public health and well-being. We will offer information on cannabis tolerance, dependence and withdrawal, the dangers of driving under the influence, facts regarding substance abuse signs and symptoms, and information about proper dosage and potency (or micro-dosing). We believe this is a critical and important step to educating consumers about cannabis and we are dedicated to promoting safe consumption in every aspect of our interaction with our guests and within the community.

COMMUNITY CONTRIBUTIONS

CTM will actively schedule meetings with Natick nonprofit groups, local councils and neighborhood organizations, as well as the Natick Police Department, the Natick Health Department, and others to engage them in CTM's companywide public health and outreach programs. This outreach will be intended to ensure that CTM's efforts in Natick are authentic, well-informed, and in line with the priorities of the town's residents and leadership.

Although our long history with the Town of Natick affords CTM the opportunity to more deeply understand the needs of the community, we take nothing for granted. We know that in order to create a culture of trust and a solid working relationship with any community, it requires that we make significant investments in the local community-based organizations and nonprofits that reflect the spirit of the town. Our door is always open to collaborate with and invest in the Town of Natick and its residents, and we welcome the opportunity to work hard to assist the town's efforts in the most meaningful way possible.

COVID-19 RESPONSE

We have entered an unprecedented time in history - a time that requires every retailer to be especially diligent and attentive to the manner and quality of their interactions with the public. As a company that provides health care solutions for medically vulnerable patients and guests, we recognize that our responsibility to protect the health and safety of the public will be elevated each and every day that the COVID-19 crisis continues.

We are carefully scrutinizing our operations and our first priority during this crisis is, of course, the health, safety, and welfare of our guests, employees, and communities. A critical component of community welfare is to adapt to the COVID-19 social distancing initiatives. Aside from implementing social distancing into the design of our facility, we have also considered some fundamental changes to our business to ensure that community members continue to be safe, should this crisis continue.

Out of an abundance of caution, CTM has expanded and enhanced our protocols for all of our facilities. These protocols, while still subject to review and approval include, but are not limited to, customer pick up options, home delivery service, and online ordering.

While we genuinely hope that this crisis will be a distant memory by the time CTM opens its doors in Natick, we believe the most prudent course of action is to consider these enhanced protocols to protect the public in the event we must continue social distancing. In these extraordinary times, we must be prepared to respond at a moment's notice to preserve the safety of our communities. However, no action will be taken on these enhanced protocols until a thorough review and discussion has taken place with the Town of Natick.

Full and Part Time Employment & Benefits

Summary

At CTM our team is who we are. As a locally owned company, we believe in hiring locally first and we are committed to supporting the diverse employment needs of the Natick community.

Our mission is to create careers for our team members, not just jobs. CTM's success is built upon a culture that both highly values and generously rewards our employees. We do this by proudly providing competitive living wages and benefits, and by encouraging every possible avenue for career growth and promotion opportunities in the organization.

Our dispensary agent compensation strategy includes living wages, health, vision and dental insurance, paid vacation, and sick time for full-time and part-time employees. We believe strongly that we must offer a competitive matrix of benefits, salaries, and flexible hours to accommodate the lifestyles and preferences of all potential hires. As an equal opportunity employer, we welcome a diverse set of employees throughout our organization and actively hire, retain, and promote outstanding individuals from different racial, cultural, economic, and ethnic backgrounds, regardless of sexual orientation or disability status.

In addition to full-time placement, CTM offers part-time employment to those individuals that can only work while their children are at school, retirees looking for part-time opportunities, and individuals looking for supplemental income opportunities. We also recognize the importance of higher education and we encourage students (ages 21 and older) to apply for the positions we have available. Management actively works with these students to accommodate their class schedules in order to give them the valuable experience they need in a competitive job market.

Our hiring practices are deeply informed by our own retail experience. We have observed throughout the past five years that, whether guests are first-time or long-time patrons, they express a conscious preference to be served by employees in the same age cohort as themselves. This age preference is an important factor in the experience of our guests and just one of the many reasons that CTM actively seeks to include every age range and every life experience in our dispensary agent roster. Our intention is to employ a very diverse staff so that guests are immediately put at ease and can naturally gravitate towards those staff members they feel may best serve their needs.

CTM has designed a workplace that welcomes our employees and encourages the freedom to collaborate. Our management team, senior leadership, and founding partners listen to and encourage ideas from every dispensary agent. This approach is invaluable to the development of a culture of excellence and the openness it creates among employees allows for our team members to develop strong careers at CTM. Our responsibility is to encourage our staff to evolve and grow with us.

Full and Part Time Employment

In the weeks prior to opening our Natick facility, CTM is committed to hiring a minimum of thirty-one (31) people to initiate store operations. As our sales increase, we anticipate that our employment numbers will grow in response to sales demand throughout our first year and into the future.

We expect that our initial thirty-one (31) employees will be hired under the following classifications:

- 15 Full-Time Sales Associates
- 4 Part-Time Sales Associates
- 3 Inventory Specialists
- 1 Lead Inventory Specialist
- 1 Manager
- 1 Assistant Manager
- 1 Floor Lead
- 5 Security Personnel

Once again, CTM is dedicated to hiring locally. For every open employment opportunity, we will give preference to local residents and prioritize our diversity plan to recruit minority, LGBTQ+, and veterans, as well as a diversity of age, life experience and part-time stay at home parents.

CTM will provide equal employment opportunities to every applicant without regard to race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, amnesty or status as a covered veteran in accordance with applicable federal, state and local laws. CTM complies with all state and local laws governing nondiscrimination in employment in every one of our facilities. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

Employment Benefits

At CTM, we have a number of employee classifications in order to accommodate the shifting landscape of individual's work needs.

- **Regular full-time employees** are regularly scheduled to work full-time shifts of a minimum of 30 hours per week in order to make them eligible for benefits.
- **Regular part-time employees** who are scheduled regularly for 20 hours per week may be eligible for some benefits subject to the terms, conditions and limitations of each offered benefits program.

- **Temporary full-time employees** are those individuals hired for a specific project, or to assist in filling hours left open by our regular full-time staff base. These individuals are typically ineligible for benefits unless specifically made eligible under company policy or deemed eligible according to plan documents.
- **Temporary part-time employees** are similarly hired for specific projects or can fill-in scheduling needs. These individuals are typically ineligible for benefits unless specifically made eligible under company policy or deemed eligible according to plan documents.

CTM offers health insurance benefits which, if elected, also includes vision and dental to all regular employees working a minimum of 30 hours per week on the 1st of the month following 60 days of employment. CTM will additionally offer Accidental Death and Dismemberment Insurance (AD&D) included as part of a basic group Life Insurance Policy.

VACATION, PAID TIME OFF & HOLIDAYS

We believe in providing vacation and paid time off immediately upon hiring - without the typical accumulation delay many other businesses apply to new employees. CTM employees will begin to accrue vacation hours the moment they begin their first day of employment with us. Vacation time is accrued and awarded per pay period and balances are adjusted per pay period if employees elect to exercise vacation time upon accrual. The rate at which vacation time is accrued is dependent upon the employees' position and length of service.

CTM understands that our services are intended for the betterment of the Natick community and we further recognize the need for a balance between work and family life. Should an employee need to take a leave of absence, it will be as simple as speaking to their manager and being directed to our HR specialists. We have a zero-tolerance policy at CTM that extends to retaliatory action and no employee will feel pressured or discriminated against if they need to exercise their right to time off.

CTM also offers its employees the following paid holidays: New Year's Day, Memorial Day, Labor Day, Thanksgiving and Christmas Day.

SICK TIME

We are very proud to offer a competitive package of sick time. All employees will receive 80 hours of sick time per year – irrespective of their status as either full-time and part-time employee.

EMPLOYEE COMPENSATION

Although specific managerial salary rates will be determined upon hiring, all entry level employees will start at an hourly wage of \$15/hour. After a standard 90-day probationary period, each

individual will be monitored for specific benchmarks of growth including customer care through our comprehensive ongoing training programs. We believe that the highest quality service to our guests and neighbors is the most important aspect of a dispensary agents' job, and CTM is fully committed to carefully training and retraining our employees throughout their careers.

CTM believes in being fully transparent about the opportunities to advance within our organization. Our policy is to continuously promote from within and encourage every employee to take advantage of the opportunities to progress. For entry-level employees, we make sure to review their progress after 6 months from their start date. For those individuals who show substantive growth in their position, they will be automatically offered the top tier of our pay increases.

Every employee is eligible for a further discretionary pay increase throughout the year though performance assessments are conducted on a yearly cycle (after the initial 6-month review). Each employee will receive an evaluation form with an assessment of their performance as well as a one-on-one assessment session with their immediate supervisor. CTM acknowledges that we cannot have an expectation for exceptional work without providing clear direction, constructive feedback, and further training opportunities. We recognize and understand that we are responsible for the performance of each of our employees, and if we are successful, we can truly promote and develop our staff to be real leaders in the community. Additionally, our performance evaluation system ensures that each employee is given an opportunity to provide their own feedback for companywide improvement while also receiving very clear goals for their own improvement in order to be successful in their career.

We also understand that employee compensation, rewards, and benefits can be non-traditional. From time to time, employees will be eligible to attend cannabis conventions, lectures, and other events as part of a CTM employee reward program. We will offer those employees who exhibit exemplary performance the opportunity to attend these events at no charge and without deducting any accrued paid time off.

Municipal Benefits Package

The founding partners of CTM are committed to meeting or exceeding the Town of Natick's expectations for a fair and equitable benefits package and, through the submission of our response to this RFI, would like to preemptively offer further negotiation should the Town of Natick wish to advance our RFI response and ultimately engage with our local company. We welcome the opportunity to establish a dialogue with the town about areas of possible contribution on our part.

In short, we would like to clearly communicate that we believe that what is set forth below is only the beginning of a conversation about the economic benefits that we can provide to the Town of Natick.

As part of a Proposed Host Community Agreement, CTM is prepared to offer the following minimum contributions and benefits to the Town of Natick.

- Payment of 3% of CTM's gross revenues from the sales of adult use marijuana from our proposed Natick retail location
- Contribution of not less than \$2,500 annually to public charities or private nonprofits in the Town of Natick. The amount of the contribution shall escalate by 5% every year
- CTM will pay all applicable real and personal property taxes to the Town of Natick

EMPLOYMENT

CTM will use its best efforts to hire qualified employees who are residents of the Town of Natick. Our initial hiring counts are estimated below, although we anticipate these numbers to grow as our adult-use sales increase over time.

- 15 Full-Time Sales Associates
- 4 Part-Time Sales Associates
- 3 Inventory Specialists
- 1 Lead Inventory Specialist
- 1 Manager
- 1 Assistant Manager
- 1 Floor Lead
- 5 Security Personnel

We proudly provide competitive living wages, benefits, and generous employee reward programs, as well as encourage every possible avenue for career growth and promotion opportunities within the organization. Our dispensary agent benefits include health, vision and dental insurance, paid vacation, and sick time for full-time and part-time employees.

We firmly believe that we must offer flexible hours to accommodate the lifestyles and preferences of all potential hires. In addition to full-time placement, CTM offers part-time employment to those individuals that can only work while their children are at school, retirees looking for part-time opportunities, and individuals looking for supplemental income opportunities.

PARTNERING WITH LOCAL BUSINESSES

As a locally owned business with founders from the Natick area, our mission is to put our local partners first in order to help strengthen the local economy. We have already begun our outreach and are proud to report that Redi has found a partner in Chocolate Therapy – located at 60 Worcester Road in Framingham. Our relationship with Chocolate Therapy’s owners is built on the premise that creating a strong local business is only achieved by mutual support and the strength of our neighboring businesses. Chocolate Therapy produces award-winning artisan confections and will provide non-infused gifts for our guests during our grand opening. Redi will also partner with Chocolate Therapy on an ongoing basis so that non-infused chocolate from their local business is available to our guests.

We believe that we can find numerous other local businesses to partner with throughout the area and are fully committed to helping rebuild the retail economy after the devastating effects of COVID-19.

Diversity Plan

Summary

CTM is dedicated to the values of mutual respect, equity, parity, and inclusion. Achieving an exceptional local business requires nothing less.

We firmly believe in hiring, retaining, and promoting outstanding individuals from different racial, cultural, economic and ethnic backgrounds regardless of their sexual orientation or disability status. CTM strives to recruit members of groups that have been traditionally underrepresented in American businesses and who may have been negatively affected by the War on Drugs. Our mission is to create a climate of respect that supports their success while fully recognizing that such an effort requires our sustained commitment, concerted effort, and complete attention.

In order for any diversity plan to achieve its desired outcomes, our entire team must work together and maintain a focus on accountability. The responsibility for equity, diversity, and inclusion lies at every level of our organization and these values are fully supported by CTM's leadership, management, and staff.

Furthermore, establishing clear and common expectations ensure that everyone understands their role in building and sustaining a diverse and inclusive workplace. This means that every member of our staff feels included, valued, supported, and heard. Our team is also committed to recognizing and addressing any biases and we will seek, accept, and encourage a diversity of people and thought. We know that we are all better together. By setting this example, the entire CTM team discovers how diversity and inclusion benefits our community, our company, and ourselves.

CTM's Diversity Plan outlines our goals in promoting equity and inclusion in our current and ongoing operations, and specifies the actions we will take to promote a healthy, respectful, and productive workplace environment.

Diversity Plan for Positive Community Impacts

INTENT

The intent of CTM's Diversity Plan is to install policies and procedures to promote a diverse workforce. CTM is committed to promote racial and gender equity and include veterans, LGBTQ, people with disabilities and other communities in the makeup of the workforce.

PURPOSE

CTM's Diversity Plan serves as a summary of the company's plan to ensure that we are a diverse and inclusive company, promoting a discrimination-free workplace and to encourage all employees to use their individual background and talents to support the growth of the company. Accepting, understanding and valuing the differences amongst our employees gives our company ideas and innovations from a variety of backgrounds and cultures.

CTM's Diversity Plan is meant to be a living document designed to promote strategies as our company grows, guide decisions and practices that impact equal opportunity and promote the principles of diversity management.

The Diversity Plan represents the initial approach to establish a comprehensive plan with goals and measures. The Plan will be reevaluated annually or as needed.

While no specific organizations have been identified as a recipient of a financial donation, which may help in furthering CTM's goals within this Diversity Plan, we will contact and receive approval that a donation can be accepted prior to making any donation, financial or otherwise. CTM will adhere to the requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, branding, marking, and sponsorship practices of every marijuana establishment. Furthermore, any actions taken, or program instituted, by CTM will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

GOALS

CTM's goals will be measured and tracked at all levels of the company at least annually as follows:

Goal 1: Recruit diverse employees at all levels.

Outcome Measure: Diversity of new hires at CTM compares favorably to the local community our operations serve. We will compare new hires to the most recent available census data for Boston, MA to ensure that our workforce reflects the demographics of Boston, one of the most diverse areas in the Commonwealth of Massachusetts.

As an example, the 2010 census data for Boston reports the following demographics:

- White: 53.9% (non-Hispanic: 47%)
- Black or African American: 24.4%
- Native American: 0.4%
- Asian: 8.9%
- Native Hawaiian and Pacific Islander: 0.0%
- Two or more: 3.9%
- Hispanic or Latino of any race: 17.5%

Measurement Frequency and Metrics: CTM will assess the demographic percentages of its workforce annually to see if it is meeting its goal of recruiting diverse employees. The first review will take place within six months of meeting our minimum staffing goals and then annually after that time. Based upon this annual review, CTM will assess its plan within one month of completing its review and be able to demonstrate proof of success or progress to the Cannabis Control

Commission (CCC) upon the yearly renewal of a license.

Goal 2: Develop, retain and promote diverse employees by fostering a culture that values differences.

Outcome Measure: CTM will administer surveys to all employees once annually to measure employee satisfaction and elicit feedback on how we can improve our company's culture. Any worker leaving the employment of CTM will be asked to participate in an exit interview with management to gauge from the employee whether or not the company fostered a culture that values differences.

Management staff will elicit feedback from the departing employee on how they can improve their retention rates among demographic groups. We will measure the retention rate by demographic group as it compares favorably to external retention rates.

Furthermore, CTM is determined to establish a baseline of demographics from the current roster of employees (based on employment records, include the number and race of employees drawn from EEO-1 surveys, and agent registration forms) one year after opening in the Town of Natick. We will track statistics to assess our growth towards meeting our goals.

CTM is committed to hiring a third-party training firm that will offer our staff a comprehensive training solely focused on diversity, inclusion and exceptional communication in the workplace.

Measurement Frequency and Metrics: CTM will administer its employee satisfaction surveys semi-annually and conduct a review of these surveys within a month of administering them. CTM will identify ways to improve its development, retention, and promotion of diverse employees and identify any aspects of its company culture that needs to be changed to meet this goal. Exit interviews and feedback from departing employees will be assessed as they take place and CTM will annually review its plan, the statistics gathered from the above outcome measures, and the results of our comprehensive diversity training to demonstrate proof of success or progress upon the yearly renewal of a license.

Goal 3: Ensure that all participants in our supply chain and ancillary services are committed to the same goals of promoting equity and diversity in the adult-use marijuana industry.

Outcome Measure: To accomplish this goal, CTM will prioritize working with businesses in our supply chain and required ancillary services that are owned and/or managed by minority groups; women, veterans, people with disabilities, and/or people of all gender identities and sexual orientations.

Measurement Frequency and Metrics: CTM will measure how many of its ancillary services and participants in its supply chain are owned and/or managed by minorities, women, veterans, people with disabilities and/or people of all gender identities and sexual orientations and will calculate the percentage of services and members of its supply chain who meet this requirement. CTM will ask suppliers and ancillary services if they would identify themselves as a business that is owned or managed by one of the targeted groups and give priority to these businesses. CTM's goal will be to work with at least 25% of businesses who identify as one of the target groups throughout

its supply chain and services. CTM will assess these percentages annually and will be able to demonstrate to the Commission the success of its progress upon the renewal of its license each year.

CONCLUSION

CTM will conduct continuous and regular evaluations of the implementation of its goals and at any point will retool its policies and procedures in order to better accomplish the goals set out in this Diversity Plan.

While no specific organizations have been contacted relative to the Diversity Plan, CTM will contact and receive written approval from any named organization who may receive a donation or work with CTM in furtherance of its diversity goals. CTM will adhere to all requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, brand, marketing, and sponsorship practices of marijuana establishments. Any actions taken, or programs instituted by CTM will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.

Sustainability

Summary

CTM was founded on the principle that a strong commitment to our neighbors must include an equally strong commitment to the natural environment that surrounds our facilities.

As a cannabis company one of our core competencies is being an agricultural company. While we will are not seeking a cultivation license in Natick, we are sharing our role as environmental stewards in cultivation as an example of how we take sustainability very seriously. Our cultivation facility in Franklin, Massachusetts, requires recycling and reusing water, heat and CO2 dissipation, and being as energy efficient as possible in order to be successful. Similarly, we are committed to maximizing sustainability in every facet of our Natick facility's construction – utilizing locally-sourced materials, hiring local vendors, installing energy efficient HVAC, lighting and plumbing fixtures, interior design elements and furniture, as well as deploying sustainable local recycling services to recycle construction and demolition debris. We also understand that the cannabis retail industry requires more packaging than traditional retail given the regulatory requirements for child resistant and odor free packages. We are committed to sourcing packaging vendors who utilize as much recycled content as possible and investing in reusable packaging wherever possible.

During our operations, CTM's sustainability policies and procedures require team members to reuse or recycle waste, minimize paper use, implement energy efficient practices for electronic equipment, and use natural, non-toxic cleaning products to help protect the health of the company, employees, and community and reduce environmental impact.

As our retail practices evolve, our sustainability goals and plans will also evolve to respond to any new environmental or health conditions. A particular example of this real-time evolution of our sustainable practices is CTM's response to the recent COVID-19 public health emergency. We recognize that our retail policies have to quickly adjust to help lower or eliminate viral transmission and by temporarily suspending the use of reusable shopping bags and making accommodations for potential in-store or curbside pickup, CTM has shown that we can swiftly alter and fine-tune sustainability plans to meet emerging needs.

Our flexibility during this time of crisis, coupled with the high value we place on environmental stewardship, is just one of the exceptional qualities of our team that we are excited to bring to the Town of Natick and to its residents.

Through our founding partner, Todd Finard, we also have a proven track record of implementing sustainable construction practices as we partner with the Town of Natick, as demonstrated in the recent 9/27 Shopping Plaza redevelopment. During the construction period, Todd installed and will maintain electrical charging stations for electric vehicles, implementing energy efficient HVAC and insulation, and utilizing all LED lights. All of these efforts not only beautified the retail

experience by making it significantly more usable for the community, but also greatly reduced the carbon footprint of the site.

Sustainability Plan

We believe that we must lead by example to protect local ecosystems. Sustainability will be a primary concern during the build-out, opening, and maintenance of the CTM Natick facility as well as our ongoing operations.

According to CTM's company policy and our Sustainability Operating Policies and Procedures, our team has developed internal sustainability obligations that follow specifications and best practices designed to maximize our positive environmental impact and minimize our environmental footprint. CTM's facility plans currently meet or exceed energy codes for all facets of our design. For the remodeling of our proposed facilities, CTM is committed to:

- Prefer local contractors and vendors
- Prefer vendors who source materials locally
- Install energy efficient HVAC systems, insulation, lighting, and plumbing fixtures
- Utilize local recycling services for demolition debris

Furthermore, our directors, managers and retail operations professionals shall implement the following sustainable practices at the CTM Natick facility where, safe, practicable and allowed under current or future lease agreements:

- Implement strict policies to reduce, reuse, and recycle all eligible retail supplies
- Utilize local recycling services
- Prefer recycled content materials or those with the lowest life-cycle cost for retail use
- Acquire sustainable, nontoxic, or biodegradable cleaning supplies for employee use
- Incorporate bicycle storage for employees
- Incorporate electric vehicle charging stations

We understand sustainability is not just implemented once during construction, rather it is a continued focus that requires measurement and ongoing improvements. To that end, CTM is committed to working closely with the utility provider to create and execute an ongoing energy savings plan, including:

- Understanding of how CTM's facility consumes energy through analysis generation
- Compare our operation with similar businesses and act accordingly
- Solicit customized energy improvement recommendations from professionals and determine how and if such recommendations can be incorporated into our operations

- Identify cost incentives through utility energy programs, such as Mass Save programs to explore financial incentives for energy efficiency and demand reduction measures

We believe that in order to make a difference for our global climate, our company culture must reflect our best efforts to produce a locally-focused sustainable environment at each of our facilities.

Sustainability Plan for Positive Community Impacts

CTM's sustainability plan shall be the policy of CTM, its employees, and contractors to reduce the consumption of materials, energy, and water used in the normal course of business; procure locally sourced materials, vendors, and contractors; and to further recycle or repurpose materials that CTM shall use. Materials, procedures, and equipment shall be selected first to benefit residents, local businesses, and the environment surrounding the area of CTM's facilities; second, to improve the condition of the built and natural environment and improve employee health; and third, to reduce environmental harm and minimize employee and environmental exposure to potentially harmful substances.

These practices shall apply, but not be limited to, construction and remodeling projects; purchase of interior furnishings, HVAC, insulation, lighting, and plumbing fixtures; purchase and distribution of materials used in a point of sale transaction; janitorial services; and landscape development and maintenance services. Any contracts accepted to perform these and other services shall be required to meet the intent of this policy.

It shall be the practice of CTM to prefer locally sourced materials and services, local vendors, and local contractors in the construction, remodeling, or renovation of its facilities. CTM shall prefer local services, local vendors, and local contractors that use resources in the most sustainable manner when procuring services for other business purposes. CTM shall procure, where safe and practicable, materials to be used in the normal and the unique business of CTM that further its sustainability goals such as reusable shopping bags and sustainable, nontoxic, or biodegradable materials for employees to clean and maintain CTM facilities.

CTM shall make necessary accommodations for, where safe, practicable and allowed by lease agreements, the use of alternative transportation modes for employees, such as bicycle storage or electric vehicle charging stations.

CTM shall, where safe and practicable, prefer recycled-content products or those meeting the lowest life cycle cost when purchasing products. CTM shall, where safe and practicable, prefer vendors utilizing recycled-content products or products meeting the lowest life cycle cost. CTM shall, where safe and practicable, prefer vendors providing a service with the lowest life cycle cost.

CTM shall implement a comprehensive, coordinated solid waste, recycling and reuse program within its facilities and shall eliminate, whenever practicable, the use of products requiring specialized waste handling. For those solid waste items not subject to the provisions of 935 CMR 500.105(11) (a)-(e) CTM shall, in the interest of the public health and in order to conserve energy and natural

resources, establish a comprehensive program for each of its facilities to manage solid waste in the following manner: reduce the amount of solid waste generated; reuse material for its original purpose; recycle material not suited for reuse; recover energy from solid waste that cannot be reused or recycled so long as the energy recovery facility preserves the quality of air, water and land resources; and dispose of solid waste that cannot be reused, recycled, or from which energy cannot be recovered by land filling or other methods approved by the Massachusetts Department of Environmental Protection.

Notwithstanding the foregoing, CTM shall implement plans to further monitor workplace practices, procedures and material use, and promote those providing the greatest reduction of energy and materials; educate CTM staff in the use of sustainable purchasing/procurement procedures; review building maintenance contracts, remodeling and new building construction proposals, and internal work plans and revise as appropriate to ensure CTM conserves resources and uses environmentally sound materials, where applicable; reduce or eliminate unnecessary use of supplies and other resources; and provide information and assistance necessary to meet the goals and objectives of this policy to all employees.

Status as Economic Empowerment or Social Equity Applicant

CTM is not eligible for either the Economic Empowerment or Social Equity Programs pursuant to, and as defined by, CMR 500.002.

Letters of Support

Our vision for our local company, and for the Natick community, are proudly shared by some of the most prominent businesses in the Town of Natick. CTM and our founding team have been long-standing partners with many of the diverse businesses and organizations in the community for over a half-century, and it is a privilege that our proposed facility would be considered an exceptional location for adult-use cannabis in Natick.

We are especially grateful for the confidence that these individuals and businesses have expressed in our ability to easily accommodate traffic, parking, and guest experience at our proposed location. Our facility at 321 Speen Street in the Cloverleaf Mall was chosen as an ideal location within an existing shopping center that would minimize any potential disruption to the surrounding areas.

Our team is honored by this support and humbled to present it to the Town of Natick as evidence of our genuine dedication to the neighbors, residents, and guests that we look forward to serving through a deep and meaningful partnership with the community for years come.

ELSON CLOVERLEAF LP

625 MT AUBURN ST
CAMBRIDGE MA 02138

617/650-5552
JOSHKATZEN@GMAIL.COM

April 27, 2020

James Freas
Department of Community & Economic Development
13 East Central Street
Natick, MA 01760

Dear Director Freas and the Adult Use Marijuana Establishment Review Committee:

I would like to express my support for Cypress Tree Management's (CTM) application for an Adult Use Marijuana Establishment in the Town of Natick.

As the general partner of the landlord of the Cloverleaf Mall, a well-established and busy retail center in Natick where CTM's proposed establishment will be located, I would like to say how well-qualified and uniquely positioned CTM is for success in Natick.

I have discussed the proposed operation with CTM over the past few months, and I have found them to be committed to providing a safe and secure establishment that fits in with the community. The property's over 600 parking spots available for use will provide more than adequate parking, and the dispensary's location at the rear of the center will not disturb the neighboring businesses at Cloverleaf. Furthermore, CTM's site is not near a school, church, or playground.

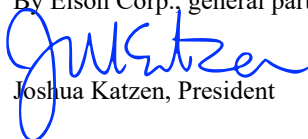
I have received many calls as well as multiple offers for this location from businesses intending to apply for an adult-use marijuana license in Natick, and having examined those many proposals and proposers, I have chosen to proceed with CTM. I like their track record of success, the diversified nature of their business, and the exceptional qualifications and longtime contributions to Natick of their founding partners.

The fact that CTM's principals are local and have nurtured, in the case of the Finard family, over 50 years, strong relationships with the Town, demonstrates that CTM will have the best interests of Natick in mind.

In short, there is no better team, no better location, and no better opportunity for success than with CTM. I respectfully submit my strongest possible recommendation for CTM to be awarded an adult use marijuana establishment license in the Town of Natick.

Very truly yours,

Elson Cloverleaf LP
By Elson Corp., general partner



Joshua Katzen, President



To Whom it May Concern:

I am writing this letter in support of Cypress Tree Management and their application to operate a dispensary in the Cloverleaf Mall on Speen Street in Natick.

The two primary reasons I support their application are focused on the location and the operator.

The Cloverleaf Mall has seemingly an endless amount of parking to service the location. There are already a number of businesses in this shopping center selling items that range from home improvements to industrial tools to all variations of alcohol within the Total Wine & More. A marijuana dispensary may, in fact, prove to be the perfect compliment to the bustling businesses already in operation at the shopping center. Furthermore, this location is truly removed from any true residential neighborhood. Those living within the residential development adjacent to the shopping center had already chosen to live proximate to an active shopping center and there are no schools, playgrounds or dense neighborhoods that this location will disrupt.

The second primary reason I support this application is that the operators are local business people that have already been doing business in the Town of Natick for more than 60 years. The Finard Family is a respected member of the business community and we have seen how they operate the businesses that they own. The shopping center at the corner of Routes 9 and 27 has been operated in a first class manner for many years and the family is involved in many charitable and philanthropic causes. Finard's business partners in this venture are also both local and have been successful business people in their own right.

Thank you for taking the time to consider my recommendation.

Sincerely,

Wheel DYNAMIX
135 WEST CENTRAL STREET
NATICK, MA
01760
Tel: (508) 647.6999
Fax: (508) 647.6222

Pierce Collision center Inc.
135 W. Central ST
Natick, Ma. 01760

To Whom it May Concern:

I am writing this letter to indicate my support for Cypress Tree Management's application to open a dispensary at the Cloverleaf Mall on Speen Street.

As a business owner in Natick, I feel strongly that we need to locate this use in a commercial area that can accommodate the parking demands – and insure the greatest chance for a successful rollout. My business is located in close proximity to the Speen Street location and I am feel strongly that the concentration of energy with Total Wines and other retail tenants will be most appropriate for this use.

I also feel strongly that Natick should choose an operator that is "local" and Cypress Tree is owned by a group of people that I personally know to be upstanding and honorable.

Thank you for taking the time to consider my letter of support,

Sincerely,

A handwritten signature in dark ink, appearing to read "David R. Spingarn", is written over a horizontal line.

April 13, 2020

Dear Natick Cannabis Advisory Board,

Please accept this letter in support of the application of Cypress Tree Management to open a dispensary in the Cloverleaf Mall. As a resident of Natick who is personally acquainted with the prospective ownership group, I offer my full endorsement.

While I have little knowledge of the details of all the other applications, I am confident that this proposed site offers the precise sort of accessibility, parking, and general surroundings to allow the Town to successfully host such a business while simultaneously offering a setting that will allow the operation to flourish.

It seems to me that in making its decision, the Town of Natick should consider not only the location of the proposed dispensary, but the character and business acumen of the proponents. In the case of Cypress Tree's proposal, the Town can take comfort not only in the great siting, but the high character of the ownership group. These are the exact type of individuals we want conducting business in our great Town. Ideal location and strong ownership will help ensure the delivery of all the desired financial benefits to the Town, and also go a long way to mitigating the negatives, real and perceived, that come along with any such operation.

Thank you for considering my recommendation.

Very truly yours,

/s/ Todd M. Grossman

39 E. Evergreen Road

JOSHUA JACOBY

33 Liberty Street, Natick, Massachusetts 01760 • 508-653-8182

March 16, 2020

James Freas
Department of Community & Economic Development
13 East Central Street
Natick, MA 01760

Dear Mr. Freas and Adult Use Marijuana Establishment Review Committee:

I would like to offer my recommendation for you and the Committee to move forward with the application of Cypress Tree Management to open a dispensary in the Cloverleaf Mall.

While I do not know of every application submitted to the Committee for approval, I feel highly confident in saying there is not another site in Natick with better accessibility, ample parking and a collection of tenants whose businesses will likely be positively impacted by the opening of a dispensary. As a long-time resident of Natick and a parent of two teenagers, we need to have the best team in place operating the dispensary safely, securely, and in a high-volume location where it can do the most help for the community.

It is in the best interest of the Town of Natick to locate our dispensary licenses in places that have the highest likelihood to drive strong sales. Our Town is in this to drive revenue, and we need to make the strength of the location and the quality of the ownership team the two most important attributes considered when the Committee makes its approval recommendations for the Board of Selectmen to consider.

In the case of the Chiang-Liebman-Finard Trio from Cypress Tree, and the strength of the Cloverleaf Mall as a location, I think we can all agree that this should be one of the two locations chosen.

Sincerely,

Joshua M. Jacoby

BRYAN DANK

16 Mark Street, Natick, MA 01760 | bryandeb@me.com

03/11/2020

Dear Natick Cannabis Advisory Board:

My name is Bryan Dank, and I am a lifelong resident of Natick. I grew up in a family that has always been heavily involved in town politics. Whether it was my mother on the School Committee, father on different Finance Committees, and both being Town Meeting members, being involved in town decisions is very important to me. I have grown up and worked with Todd Finard on many different projects including his location at 9/27 Shopping Center and the recent renovation to the former Building #19 site. My family and I would like to offer our recommendation to move forward with the application of Cypress Tree Management to open a dispensary in the Cloverleaf Mall.

While I don't know of every application being submitted, I am certain that there is not another site with better accessibility, ample parking and a collection of tenants whose business will likely be positively impacted by the opening of a dispensary. It is in the best interest of the Town to locate these two dispensary licenses in places that have the highest likelihood to drive strong sales. Our Town is in this to drive revenue and we need to make the strength of the location (along with the quality of the ownership team) as the most important attributes being considered.

I hope this letter of support for Cypress Tree and Cloverleaf helps them to be considered seriously for one of the two licenses. Should you have an interest in speaking with me directly please feel free.

Sincerely,


Bryan Dank

16 Mark Street, Natick MA 01760

Office: 617-614-1211 | Home: 508-651-1517

Town of Natick
March 11, 2020
To Whom it May Concern,

I am writing this letter of recommendation in behalf of Todd Finard and Cypress Tree Management Co. in their application for a license to open a dispensary in the Cloverleaf Mall.

I have been a resident of Natick for over 50 years. My late husband, Michael (Mickey) Dank and I have served on various Town Boards both volunteer and elected positions. We were both Town Meeting members for over Thirty years. Michael served on the Finance Committee for several years and was instrumental in the development of the Sassamon Trace Golf Course. I was elected and served on the School Committee for twelve years. We both were always involved in Natick's government and concerned about the growth and development of this town.

Todd is a wonderful person with a truly upstanding character. He and his family have been business owners in Natick for many years, including the 9/27 Exchange and other properties. I believe the location of his proposed dispensary is perfect. It is not in a family centered neighborhood, there is currently traffic that goes to that shopping center, and Total Wines with residents buying alcohol without any incidents has been located there for many years.

It is with absolute confidence that I am recommending Todd and Cypress Tree Management to receive one of the dispensary licenses. Please feel free to contact me with any questions.

Sincerely yours,
Phyllis Dank
27 East Evergreen Rd
Natick, Ma. 01760

04/23/2020

Adult Use Marijuana Establishment Committee

13 East Central Street
Natick, MA 01760

Dear Natick Cannabis Advisory Board:

My name is Melissa Noone and I am a proud resident of Natick since 2015 and my husband since 2011.

I am writing this letter to recommend that you award Cypress Tree Management a license to open a dispensary at the Cloverleaf Mall on Speen Street.

The site selected by Cypress Tree Management is one of the most ideal locations for a dispensary due to its numerous accessible routes and ample parking for customers.

The Town of Natick will benefit significantly by placing these retailers in areas that will have the greatest possibility for continued success. This site at Cloverleaf Mall must be one of them.

Thank you for taking the time to consider all of these applicants as well as reviewing my support for the applicant and for the location listed above.

Best,



Melissa Noone
mdesingco@gmail.com

David Margil
23 Curve Street
Natick, MA 0170
617-388-4538
dmargil@gmail.com

May 8, 2020

Mr. James Freas
Director of Economic Development
Town of Natick
13 E. Central St.
Natick, MA 01760

To the Office of Community and Economic Development:

My name is David Margil and I am a lifelong resident of Natick. I have served in various roles in town government and – in the spirit of full disclosure – I am “sort of related” to Todd Finard, one of the owners of Cypress Tree Management, an applicant who has filed an application to open a dispensary in the Cloverleaf Mall on Speen Street.

Todd’s first cousin, Bryan Dank (who also lives in Natick) happens to also be my first cousin – which make Todd and I “unofficial” cousins.

The Finard Family has been an active participant in the Natick business community for many years. They were involved in the first stage of the Natick Mall redevelopment – and they have owned and operated the 9/27 Shopping Center in a first-class manner for as long as I can remember.

The Town of Natick should seek operators who will be accountable. An “out of town” multi-state operator or publicly traded sponsorship group will seek profits as their primary motive. A local family like the Finards – and Cypress Tree Management – will be far more present and accountable as this industry takes shape in the coming years. Additionally, I believe that the Cloverleaf Mall is the ideal location for this use. It does not impact any neighborhood in a negative manner as many are concerned will happen in the general areas in which we located these two licenses.

Please accept this letter as my strong recommendation in favor of Cypress Tree Management and their proposed location.

Sincerely,

David Margil

Natick Cannabis Advisory Board
Attn: James Freas
Department of Community & Economic Development
13 East Central Street
Natick, MA 01760

Dear Mr. Freas,

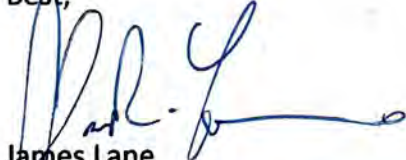
My name is James Lane and I am a resident of Natick, living at the Cloverleaf Apartments. I have now been a tenant at this location for 5 years, having moved here in May of 2015.

I am writing this letter to recommend that you award Cypress Tree Management Natick a license to open a dispensary at the Cloverleaf Mall on Speen Street. While I don't know of every application being submitted, I am certain that there is not another site with better traffic accessibility, ample parking and a collection of commercial tenants whose business will likely be positively impacted by their opening. Indeed, having witnessed the recent traffic issues that arose with the Starbucks drive-through during the pandemic, I must say I am especially leery of dispensary being allowed to open on Route 9.

I also believe the quality of the ownership team is critical to ensure an operation that will be a strong corporate citizen of Natick. In the case of Cypress Tree, their strong local ties and proven business track records makes them an ideal awardee. I think this point is especially important as a father of two daughters and a strong proponent of a well regulated recreational use system. Candidly I am not even a recreational user myself, so the import of the corporate responsibility that a firm like Cypress Tree brings to the table is paramount to the comfort level of parents and citizens like me. As we move forward with this process we want to insure we do so with commercial operators we trust and who take their partnership with the community seriously. I know you join me in this sentiment.

Thank you for taking the time to consider all of these applicants – and thank you further for understanding the strength of the location and Cypress Tree as an applicant.

Best,



James Lane
325 Speen St
Apt. 202
Natick, MA 01760

