MANAGEMENT AND OPERATIONS PROFILE
Request for a Certificate to Registration to
Operate a Registered Marijuana Dispensary

INSTRUCTIONS

This application form is to be completed by a non-profit corporation that wishes to apply for a Certificate of Registration to operate a Registered Marijuana Dispensary ("RMD") in Massachusetts, and has been invited by the Department of Public Health (the "Department") to submit a Management and Operations Profile.

Once invited by the Department to submit a Management and Operations Profile, the applicant must submit the Management and Operations Profile within 45 days from the date of the invitation letter, or the applicant must submit a new Application of Intent and fee.

If invited by the Department to submit a Management and Operations Profile for more than one proposed RMD, you must submit a separate Management and Operations Profile, attachments, and application fee for each proposed RMD. Please identify each application of multiple applications by designating it as Application 1, 2 or 3 in the header of each application page. Please note that no executive, member, or any entity owned or controlled by such an executive or member, may directly or indirectly control more than three RMDs.

However, even if submitting a Management and Operations Profile for more than one RMD, an applicant need only submit one background check packet, including authorization forms for all required individuals, and fee associated with the background checks.

Unless indicated otherwise, all responses must be typed into the application forms. Handwritten responses will not be accepted. Please note that character limits include spaces.

Attachments should be labelled or marked so as to identify the question to which it relates.

Each submitted application must be a complete, collated response, printed single-sided, and secured with a binder clip (no ring binders, spiral binding, staples, or folders).
Mail or hand-deliver the Management and Operations Profile, with all required attachments, the $30,000 application fee, and completed Remittance Form to:

Department of Public Health
Medical Use of Marijuana Program
RMD Applications
99 Chauncy Street, 11th Floor
Boston, MA 02111

All fees are non-refundable and non-transferable.

REVIEW

Applications are reviewed in the order they are received.

After a completed application packet and fee is received by the Department, the Department will review the information and will contact the applicant if clarifications/updates to the submitted application materials are needed. The Department will notify the applicant whether they have met the standards necessary to be invited to submit a Siting Profile.

PROVISIONAL CERTIFICATE OF REGISTRATION

Applicants have one year from the date of the submission of the Management and Operations Profile to receive a Provisional Certificate of Registration. If an applicant does not receive a Provisional of Certificate of Registration after one year, the applicant must submit a new Application of Intent and fee.

REGULATIONS

For complete information regarding registration of an RMD, please refer to 105 CMR 725.100.

It is the applicant’s responsibility to ensure that all responses are consistent with the requirements of 105 CMR 725.000, et seq., and any requirements specified by the Department, as applicable.

PUBLIC RECORDS

Please note that all application responses, including all attachments, will be subject to release pursuant to a public records request, as redacted pursuant to the requirements at M.G.L. c. 4, § 7(26).

QUESTIONS

If additional information is needed regarding the RMD application process, please contact the Medical Use of Marijuana Program at 617-660-5370 or RMDapplication@state.ma.us.
CHECKLIST

The forms and documents listed below must accompany each application, and be submitted as outlined above:

☐ A fully and properly completed Management and Operations Profile, signed by an authorized signatory of the applicant non-profit corporation (the “Corporation”)

☐ A copy of the Corporation’s Articles of Incorporation

☐ A copy of the Corporation’s Certificate of Good Standing from the Massachusetts Secretary of State

☐ A copy of the Corporation’s bylaws

☐ An Employment and Education form (use template provided) for each of the following individuals: The Corporation’s Chief Executive Officer, Chief Operations Officer, Chief Financial Officer, individual/entity responsible for marijuana for medical use cultivation operations, and individual/entity responsible for the RMD security plan and security operations

☐ A bank or cashier’s check made payable to the Commonwealth of Massachusetts for $30,000

☐ A completed Remittance Form (use template provided)

☐ A sealed envelope with the name of the Corporation and marked “authorization forms,” that contains the background check authorization forms (use forms provided) and fee, for each of the following actors:

- Chief Executive Officer; Chief Operating Officer; Chief Financial Officer; individual/entity responsible for marijuana for medical use cultivation operations; individual/entity responsible for the RMD security plan and security operations; each member of the Board of Directors; each Member of the Corporation, if any; and each person and entity known to date that is committed to contributing 5% or more of initial capital to operate the proposed RMD. For entities contributing initial capital to operate the proposed RMD, authorizations forms must be completed and signed by the entity’s Chief Executive Officer/Executive Director and President/Chair of the Board of Directors.

Information on this page has been reviewed by the applicant, and where provided by the applicant, is accurate and complete, as indicated by the initials of the authorized signatory here:  

Management and Operations Profile – Page 3
SECTION A. APPLICANT INFORMATION

1. Medicinal Alternatives, Inc.
   ____________________________
   Legal name of Corporation

2. Michael DeCaro
   ____________________________
   Name of Corporation's Chief Executive Officer

3. 120 Gilboa Street, Douglas, Massachusetts 01516
   ____________________________
   Address of Corporation (Street, City/Town, Zip Code)

4. Michael DeCaro
   ____________________________
   Applicant point of contact (name of person Department of Public Health should contact regarding this application)

5. (508) 887-5719
   ____________________________
   Applicant point of contact's telephone number

6. mdecaro@gilboaproperties.com
   ____________________________
   Applicant point of contact's e-mail address

7. Number of applications: How many Management and Operations Profiles do you intend to submit?
   1

SECTION B. INCORPORATION

8. Attach a copy of the corporation's Articles of Incorporation, documenting that the applicant is a non-profit entity incorporated in Massachusetts.

9. Attach a copy of the corporation's Certificate of Good Standing from the Massachusetts Secretary of State.

10. Attach a copy of the corporation's bylaws.
SECTION C. NON-PROFIT COMPLIANCE

Answer each of the questions below to explain how the Corporation will remain in compliance with the non-profit requirements of Ch. 369 of the Acts of 2012, the regulations at 105 CMR 725.000, and “Guidance for Registered Marijuana Dispensaries Regarding Non-Profit Compliance.” Please refer to the “Guidance for Registered Marijuana Dispensaries Regarding Non-Profit Compliance” document in completing this form.

11. Please identify any management company that the applicant intends to utilize and summarize the terms of any agreement or contract, executed or proposed, with the management company.

Medicinal Alternatives, Inc. does not intend to utilize a management company at this time.

Information on this page has been reviewed by the applicant, and where provided by the applicant, is accurate and complete, as indicated by the initials of the authorized signatory here: [Signature]
12. Please identify any agreements or contracts, executed or proposed, in which the applicant will engage in a Related Party Transaction and summarize the terms of each such agreement.

At the present time, Michael DeCaro (CEO) and Patricia DeCaro (CFO) have committed capital to Medicinal Alternatives, Inc. In the event DPH approves the registration, MAI will negotiate and enter into an agreement with these capital contributors. Such agreement will be vetted with the DPH before execution.
13. Please identify whether any members of the Board of Directors are also serving as employees of the proposed RMD and, if so, their title and role with the proposed RMD.

No members of the Board of Directors are serving as employees of Medicinal Alternatives, Inc.
14. Please identify whether any members of the Board of Directors are serving as officials, executives, corporate members or board members for any management company, investor or other third party proposed to contract or otherwise conduct business with the proposed RMD.

No members of the Medicinal Alternatives, Inc. Board of Directors are serving as officials, executives, corporate members or board members for any management company, investor or third party proposed to contract or otherwise conduct business with the proposed RMD.
15. Please identify any contract or agreement, executed or proposed, under which a percentage or portion of the applicant's revenue will be distributed to a third party and summarize the terms of any such agreement or contract.

Medicinal Alternatives, Inc. does not have any contract or agreement, executed or proposed, under which a percentage or portion of the applicant's revenue will be distributed to a third party.

The applicant agrees and attests that it will operate in compliance with all applicable state laws and regulations, including, but not limited to, laws regarding child support and taxation, as well as the "Guidance for Registered Marijuana Dispensaries Regarding Non-Profit Compliance."

Signature of Authorized Signatory

Patti Jean Hebert

Date Signed

26 October 2015

Print Name of Authorized Signatory

Title of Authorized Signatory

President of the Board of Directors,
Medicinal Alternatives, Inc.

Information on this page has been reviewed by the applicant, and where provided by the applicant, is accurate and complete, as indicated by the initials of the authorized signatory here:
SECTION D. EXPERIENCE

16. Attach an Employment and Education form (use template provided) for each of the following individuals: The Corporation’s Chief Executive Officer, Chief Operations Officer, Chief Financial Officer, individual/entity responsible for marijuana for medical use cultivation operations, and individual/entity responsible for the RMD security plan and security operations.

17. Describe the experience, and length of experience, of the Corporation’s Chief Executive Officer, Chief Operations Officer, and Chief Financial Officer with running a non-profit organization or business.

Michael DeCaro (CEO) has over 25 years of experience running a business. In 1988, Michael founded Classic Envelope, Inc. using personal savings, bank financing, and outside investments. The operation was capital intensive and the marketplace was highly competitive due to envelope manufacturing being a commodity business. The company began with 4 employees and grew to over 100 employees by 2015. As Founder and President, Michael has performed nearly every function within the organization including sales, marketing, customer service, operations, packaging, shipping, maintenance, and anything else that was required to ensure the success and growth of the business. In 1994, with revenues rapidly increasing, the company expanded from a 20,000 sq. ft. facility to a 30,000 sq. ft. facility and later to a 90,000 sq. ft. facility with operations 24 hours per day, 5 days per week. In 2012, with revenues in excess of $10 million dollars per year, the company moved to a 160,000 sq. ft. facility where operations continued 24 hours per day, 5 days a week. Under Michael’s ownership, at its peak, Classic Envelope had annual revenues of approximately $14 million dollars. Michael sold Classic Envelope in 2015. Michael is highly skilled in the areas of business management, manufacturing, plant/facility design/buildout, financial management, product development, branding, packaging, distribution, supply chain management, human resources, and industry leadership. In 2014, Classic Envelope was recognized as the Worcester Business Development Council’s Small Business of the Year.

Patricia DeCaro (CFO) has over 25 years of experience running a business. As the second employee of Classic Envelope, Patricia performed every necessary business function to help the company from start up through the sale. Most recently, Patricia served as the company’s Controller and Vice President. As Vice President and Controller, she established relationships with the banks, managed the company through a stock buyback, and performed the daily financial management responsibilities for a company with approximately $14 million in revenue. In addition, she led a team of five employees who were responsible for tax filings, reconciliations, balance sheets, accounts payable, accounts receivable, purchasing, and billing.

Christopher Sands (COO) has approximately 2 years of experience running a business. Since 2014, he has been Managing Partner of Medical Cannabis Consultants in Rhode Island where he oversees marketing, patient education, accounting, and compliance. Previously, Chris was the Director of Operations for Summit Medical Compassion Center a Rhode Island dispensary where he managed 18 employees and had oversight of quality control, compliance, patient education, security and cultivation. In addition, Chris managed product pricing by balancing the best interests of the Center while keeping patient access and compassion a top priority.
18. Describe the experience, and length of experience, of the Corporation's Chief Executive Officer, Chief Operations Officer, and Chief Financial Officer with providing health care services.

Michael DeCaro (Chief Executive Officer) does not have experience providing health care services.

Patricia DeCaro (Chief Financial Officer) does not have experience providing health care services.

Christopher Sands (Chief Operations Officer) has over 15 years of experience providing health care services. After graduating from the Paramedic Program at Northeastern University, Chris received his Masters of Health Sciences (Physician Assistant) at Quinnipiac University in 2002. He is certified in adult and pediatric advanced life support and has an active DEA license allowing him to prescribe controlled substances. He has worked as a Physician Assistant in many different settings, including emergency rooms, surgical floors, hospice rooms, urgent care centers and private practice settings. In his current position, Chris is responsible for interviewing patients, conducting physical exams, ordering and interpreting diagnostic tests, suturing, and dictating if a patient requires a higher level of care whether through admission or transfer to a hospital. Chris has experience assessing patients as part of a team in order to expedite patient access to healthcare by utilizing urgent care centers rather than traditional primary care doctor offices or emergency rooms. In addition, Chris has worked with staff at an internal hospital pharmacy to develop medical marijuana protocols such as storage, dosing, frequency and side effects when using medical marijuana as a treatment option. Through his work with emergency room patients, cancer patients and Hospice patients, Chris has a tremendous amount of clinical knowledge and has witnessed firsthand how medical cannabis can help patients with a variety of ailments including substance abuse and pain management. Chris will be a key member of the executive management team of Medicinal Alternatives, Inc.
19. Describe the experience, and length of experience, of the Corporation’s Chief Executive Officer, Chief Operations Officer, and Chief Financial Officer with providing services for marijuana for medical purposes.

Michael DeCaro (Chief Executive Officer) does not have experience providing services for marijuana for medical purposes.

Patricin DeCaro (Chief Financial Officer) does not have experience providing services for marijuana for medical purposes.

Christopher Sands (Chief Operations Officer) has been providing services for marijuana for medical purposes since 2005. In 2005, Chris became a licensed caregiver in Rhode Island and was permitted to cultivate medical cannabis for patients. Chris handpicked patients based on different ailments in order examine how certain strains would affect them, including neurologically impaired patients who benefited from genetics rich in Cannabidiol (CBD). He has made CBD medicated breath strips to treat autism, Tetrahydrocannabinol (THC) rich tinctures for cancer victims and is now working with patients suffering from Crohn’s Disease by making coconut THC suppositories. He is currently working with medical groups from Rhode Island Hospital and Hasbro Children’s Hospital to discuss possible medical trials in Massachusetts involving cannabis efficacy. Since 2013, Chris has served as Managing Partner of Medical Cannabis Consultants in Rhode Island where he oversees marketing, patient education, accounting and compliance. Previously, Chris was the Director of Operations of Summit Medical Compassion Center a Rhode Island dispensary where he managed 18 employees and had oversight of quality control, compliance, patient education, product menus, security and cultivation. In addition, Chris managed product pricing by balancing the best interests of the Center while keeping patient access and compassion a top priority. As a licensed Physician Assistant since 2002, Chris is able to draw from his medical knowledge when working with prospective and current patients to implement a treatment plan that addresses a patient’s individual healthcare needs. Chris has worked with staff at an internal hospital pharmacy to develop medical marijuana protocols such as storage, dosing, frequency and side effects when using medical marijuana as a treatment option. Given his passion for helping patients, Chris strives to remain current with the industry by attending conferences for medical professionals, including the International Cannabinoid Medicine Conference and is a member of NORML, Patients Out of Time and Americans for Safe Access.
20. Describe the experience, and length of experience, of the Corporation’s individual/entity responsible for marijuana for medical use cultivation operations and individual/entity responsible for the RMD security plan and security operations with providing services for marijuana for medical purposes.

Christopher Jardin (Head of Cultivation) has been cultivating and providing services for marijuana for medical purposes on a professional basis for over 7 years. Chris has been a reliable provider of medicine to Rhode Island’s licensed compassion centers since their inception. He has extensive knowledge and experience in all aspects of cultivation from seed or cutting through harvest. Chris has grown over 100 different cannabis strains and has a strong background in CBD rich strains. He is also a skilled producer of numerous extractions including hash oil, BHO, tinctures, and topicals. Chris has a thorough understanding of grow room design, allowing him to properly oversee product production in order to ensure consistent and timely harvests. He has broad experience with multiple nutrient lines and grow mediums. In addition, he has expertise in soil growing methods including micronutrients, beneficial bacteria, and nutrient implementation as well as propagation from both clone and seed. His horticultural skills have been developed throughout his life and he has extensive experience growing vegetables, flowers, and fruit trees as well as treating plants for diseases, insects, and fungus using a variety of treatment methods.

Although The Monahan Group, Inc. (MGI) (Entity Responsible for RMD Security) has no direct experience providing services for marijuana for medical purposes, the entity has been providing alarm and security services since incorporating in 1988. MGI currently provides consulting and security management services, and installs and services security systems. MGI was responsible for designing the security plan for the 850,000 sq. ft. Worcester Medical Center and was responsible for the installation of all of the center’s security systems. MGI also managed the St. Vincent Hospital Department of Public Safety and Hospital Police Department for 22 years.

Although John J. Monahan (Individual from MGI responsible for RMD security) has no direct experience providing services for marijuana for medical purposes, he has over 50 years of investigative, security, and alarm experience. John began his career in 1964 as a Constable and founded Monahan & Associates to provide constable services throughout Massachusetts. In 1970, John co-founded City Detective Agency, Inc., a corporation that provided investigative and guard services. In 1973, John shifted his career to focus on electronic security and established CDA Burglar and Fire Alarm Company, Inc. (CDA), an entity that installed, maintained, and managed security systems. CDA’s clients included a medical practice with approximately 35 ambulatory clinic sites, many of which had pharmacies. John co-founded MGI in 1988, where he has served as Treasurer and Security Advisor, overseeing the company’s daily operations. He is a member of the Central Station Alarm Association, the Massachusetts Security Contractors Association, and the National Burglar and Fire Alarm Association.

Information on this page has been reviewed by the applicant, and where provided by the applicant, is accurate and complete, as indicated by the initials of the authorized signatory here: ___________________
SECTION E. OPERATIONS

21. Provide a summary of the RMD’s operating procedures for the cultivation of marijuana for medical use.

Medicinal Alternatives' (MAI) marijuana cultivation SOPs are intended to ensure agent, product & public safety; produce consistent, predictable yields based on accepted science; and create transparent, compliant & efficient operations. Our extensive SOPs address cultivation topics and include, but are not limited to: CO2 Systems; Crop/Supply Management; Disease Management; Environmental Controls; Pest Management; Fertilizer/Soil/Media Management; Spray/Feeding Protocols; Nutrient Prep Form; Hygiene/Sanitation; Infected Handler Guidelines; Security/Limited Access Areas; Monitoring/Record keeping; Inventory Management/Storage; Procedure Variance; Quality Assurance; & Water Quality.

No non-organic pesticides will be used and cultivation will be consistent with DPH guidance on U.S. DOA 7 CFR, Part 205 organic requirements. Our cultivation process will use best practices to prevent contamination, including, but not limited to mold, fungus, bacterial diseases, rot, pests, nonorganic pesticides, mildew, & other contaminants identified as posing potential harm. The soil used for cultivation will meet the U.S. Agency for Toxic Substances & Disease Registry's Environmental Media Evaluation Guidelines for residential soil levels. Waste disposed of to minimize odor/pests.

Pursuant to 725.105(B)(1)(e)-(f), all phases of cultivation (strain selection, seed germination, grow mediums and organic nutrient selection, establishment of lighting grow cycle, harvesting, drying, & curing) will take place in designated, locked, limited access areas that are monitored by a surveillance system compliant with 725.110(D)(1)(d)-(i).

All of our soil/solids will be sampled/analyzed prior to use, when new soils/solids are received from a different source, & annually.

Proper sampling collection steps will be followed including use of disposable gloves, clean sampling area, appropriate tools & containers, no cross contamination & time records kept for each sample. Representative samples will be collected and maintained for DPH review with duplicate samples collected at least annually & 1 for every 20 samples. All logbooks & chain of custody forms will be available for DPH review. We will create & maintain cultivation and sampling diagrams for review. We will have a sufficient plumbing system & water supply & our water will be derived from a public source & public records of analysis will be maintained & available for DPH review.

Best Management Practice, Good Agricultural Practice, & Good Handling Practice will be used. MAI has adopted marijuana cultivation standards from the American Herbal Pharmacopoeia & the American Herbal Products Association & adapted USDA Organic Standards & FDA standards to create a holistic medical marijuana crop management system. We also have adopted or adapted the use of the HACCP Principles & Application Guidelines (National Advisory Committee on Microbiological Criteria for Foods).
22. Describe the types and forms of Marijuana Infused Products ("MIPs") that the RMD intends to produce, if any.

Medicinal Alternatives (MAI) will produce high-quality MIPs & comply with DPH Regs. MIPs will be medicinal in nature, lab tested & packaged in dosage levels allowing patients to self-titrate. At minimum, product line will include: transdermal/topical salve and patches, creams/lotions, oral mucosal/sublingual dissolving tablets, tinctures, sprays, inhalation-ready-to-use CO2 extracted hash oils, pre-dosed oil vaporizers, ingestion-capsules, food/oil/beverages.

MIPs will have a legible, affixed label w/ letters at least 1/16" in size and info required by 725.105(E)(3), will not resemble commercially available candy & be packaged in plain/opaque tamper/child-proof containers w/o images except MAI logo. Accidental ingestion of edibles/beverages to be avoided via proper packaging & labeling. MIPs produced are not considered a food/drug per M.G.L. c94, s.1.

Marijuana (excluding MIPs) products will be properly, legibly and firmly labeled per 725.105(E)(2).

All products will be weighed with a certified Class II NTEP Balance.

Ingredients, THC/CBD concentration profiles will be on labels and may include: Tetrahydrocannabinol acid; Tetrahydrocannabivarins; Cannabinadiolic acid; Cannabidivarin; Cannabinol; Cannabigerol; Cannabichromene; and other cannabinoids. Food additives will be approved/properly used. 3rd party sample results to calculate extract addition quantities for exact dosage & consistent results.
23. Provide a summary of the RMD’s methods of producing MIPs, if the RMD intends to produce MIPs.

Medicinal Alternatives (MAI) will create MIPs with consistent cannabinoid profiles to treat a range of debilitating conditions.

Ingredients from DPH approved source will be safe, unadulterated & labeled. Agents wear gloves & utilize ware-washing facilities in kitchen w/o pests. Surfaces, utensils, equipment & linens properly sanitized, stored, dried & handled to prevent contamination during preparation, storage & display.

Proper cooling methods to prevent microorganism growth; approved thawing methods & accurate thermometers. Per DPH Regs, prepared on food-grade stainless steel tables & packaged in secure area with security cameras. MIPs tested pursuant to 725.105(C)(2) & HACCP compliant. TPHC used if appropriate.

Leaves & flowers of female plants processed in safe/sanitary manner, well cured & free of seeds, stems, dirt, sand, debris & other foreign matter; and free of contamination by mold, rot, fungus & bacterial disease.

Extraction/Refining: prep w/ lab quality grinder; oil (butter/olive oil), ethanol and/or supercritical C02 extraction; external testing for cannabinoid profile & potency; decarboxylation. If practicable fractioning to produce pure active cannabinoids; fracture, separate & purify to produce concentrates that are high in specific, single cannabinoids using HPLC.
24. Provide a summary of the RMD’s operating procedures for the provision for security at the RMD.
25. Provide a summary of the RMD's operating procedures for the prevention of the diversion of marijuana.
26. Provide a summary of the RMD's operating procedures for the storage of marijuana for medical use.
27. Provide a summary of the RMD’s operating procedures for the transportation of marijuana for medical use.
28. Provide a summary of the RMD's operating procedures for inventory management.
29. Provide a summary of the RMD's operating procedures for quality control and testing of product for potential contaminants.

MAI SOPs comply with DPH Regs and protocols for quality control/testing.

All sampling:
• Decontaminated area
• Proper tools & disposable gloves
• Separate & store in appropriate container; no cross contamination
• Use Chain of Custody form
• Records kept > 1yr

Finished MJ:
• Sample from 5% of finished MJ
• Collection plan for each product type produced
• Log-collection date/time; agent IDs; product type & procedure (grinding, mixing); sample ID'd by batch#, ID#, batch impacted
• Labels-batch/sample ID# + date/time of collection & agent ID

Grow Media:
• Source soils & solids prior to use, when changed, not less than 1X/6 mo. w/ duplicates every 20X
• Media lots tracked to plants used with and logged per DPH Regs.
• Non-PWS: sampled prior to use & quarterly; PWS: records maintained & avail.

Testing:
Completed post sampling by DPH approved independent ISO 17025 lab. Tested for cannabinoid profile and contaminants (mold, mildew, heavy metals, plant-growth regulators, non-organic pesticides, & info DPH requires). Excess MJ from lab destroyed by MAI. Lab to provide signed narrative detailing:
• Sample
• Analysis
• Methods
• Chain of custody docs
• Info sought
• Summary & detail of results incl. units of measure, date/time

Results kept >1yr, how destruction of product, investigation of source of contamination & mitigation steps. No MAI agent will have financial interest in lab. No lab employee will get compensation from MAI. Lab employees to be registered MAI agents.
30. Provide a summary of the RMD’s operating procedures for maintaining confidentiality of registered qualifying patients, personal caregivers, and dispensary agents, as required by law.

In compliance with 105 CMR 725.200, 725.105(H)&(I), patients, caregivers, & agent info is confidential & shall not be disclosed without the written consent of the individual to whom the information applies, or as required under court order. DPH may access this information to carry out official duties. Hard copies of records stored in secure locked area, w/ limited access. Any loss/alteration of records related to MJ/MIPS, patients, caregivers, or agents reported to DPH, law enforcement & protected party.

Agents will have documented mandatory confidentiality training.

Patient tracking software will be in accordance with HIPAA principles & encrypted. Network servers will be protected by SSL, firewall, biometric locks in a secure area with 24hr surveillance. Software & infrastructure will be updated regularly, including relevant security patches. Software will be compliant & compatible with DPH’s electronic system. Access to database limited to key agents.

Data security strategies incl. frequent password changes, length & character diversity requirements for passwords, restrictions of personal flash/thumb drives on computers, marking software for each system and securing when not in use. Emails to patients will say "Confidential" & be sent on secure servers, either individually, using BCC, or using secure bulk email and will not provide patient info or refer to MJ in subject line.

Depending on siting & balanced with security, parking, entrance & exit will be discreet.
31. Provide a summary of the RMD's personnel policies.

MAI will comply with 105 CMR 725.105(1)(4) & committed to safety, professional development, compliance, equitable compensation & healthcare benefits. MAI to register in the MMJ Online System. BOD/agents/EMTs/volunteers will be RMD agents & remain compliant per 725.030(A)-(C) & (E). Personnel records will be kept for at least 1yr following termination. MAI to notify DPH no more than 1 business day after termination.

To strengthen the local community, recruiting locally is a priority. Agents will receive training on confidentiality, internal security policies, emergency procedures and will complete training specific to their job function. Agents will receive, at minimum, 8hrs of on-going training annually.

Any agent who diverts MJ or engages in unsafe practices will be dismissed and such activities will be reported to law enforcement & DPH.

Agents in contact with MJ or non-edible MIPs, will be subject to the requirements for food handlers specified in 105 CMR 300.000 & shall conform to sanitary & good hygienic practices.

MAI provides equal opportunities regardless of race, religion, ethnicity, sexual orientation or other factors resulting in discrimination. Policies include: safety, harassment, work hours, job reviews, maintaining alcohol, tobacco, & drug free workplace, compensation, benefits, vacation/holidays/leaves, training/professional development, record keeping, agent registration, compliance, security, standards of conduct, confidentiality.
32. Provide a summary of the RMD's operating procedures for dispensing of marijuana for medical use.
33. Provide a summary of the RMD’s operating procedures for record keeping.

MAI SOPs will ensure records are accurate & compliant with 105 CMR 725.103(G)-(1). Records maintained & avail. upon request include, but not limited to:

- Inventory
- Sales/Seed-to-Sale Tracking/Cultivation Records- incl. ID of buyer, quantity, form, price & inventory records per DPH Regs
- Personnel Records-incl. staffing plan/roster charts/job descriptions/training materials; list of non-profit BOD&EMT; records for agents kept for >1 yr. after termination incl. agent registration/de-registration notification, age, crim. history incl. CORI (separate from others); agents' written acknowledgment of limitations on cultivate/harvest/prepare/package/transport/dispense authority; attestation that agent will not divert; DPH ID card; agent application fee; yearly renewal of DPH ID; changes to submitted info;
- Salaries/wages/stipends/compensation/bonuses/benefits to anyone associated with MAI
- Business Records-assets & liabilities; monetary transactions; account info incl. journals/ledgers/ supporting documents/agreements/checks/invoices/vouchers; 3rd party financial audits
- Training Records
- Patient Ed. Materials
- Waste Disposal
- Transportation
- Product Testing
- Recalls/Withdrawals/Complaints
- Security
- Incident Reports-immediately notify PD & DPH w/in 24hrs of discovering loss/authorized alteration of records
- SOPs/Changes to SOPs
- DPH correspondence

Records kept in secure location per DPH Regs. After closure, records kept min of 2yrs at MAI's expense in form/location acceptable to DPH.
34. Provide a summary of the RMD’s plans for providing patient education.

Pursuant to 725.105(K), Medicinal Alternatives (MAI) will have an adequate supply of up-to-date educational materials for patients & caregivers. Materials will be available in languages accessible to all patients & caregivers and the visual/hearing impaired.

In addition to patient consultation/education, MAI will hold educational meetings. Education materials include, but are not limited to:

- Warnings: FDA has not analyzed or approved marijuana; there is limited information on side effects; potential health risks; marijuana should be kept away from children; driving under the influence of marijuana is prohibited by M.G.L. c. 90, s. 24; machinery should not be operated
- Info to assist in selection, descriptions of the differing effects of strains, as well as the various forms & routes of administration
- Patient Log: to track the strains used & their associated effects
- Dosage Guidelines: proper dosage & titration for each route of administration; emphasis on using the smallest amount possible to achieve the desired effect; impact of potency explained
- Info regarding tolerance, dependence & withdrawal
- Substance abuse signs & symptoms & referral info for treatment programs
- Statement that patients may not distribute marijuana to other individuals & that unused, excess, or contaminated product must be returned to RMD for disposal
- Patient rights
- Condition-specific booklets
- Any other info required by DPH

All materials will be made available to DPH upon request.
35. Provide a summary of the RMD’s operating procedures for patient or personal caregiver home-delivery, if the RMD plans to provide home-delivery services.
36. Provide a summary of the RMD’s policies and procedures for the provision of marijuana for medical use to registered qualifying patients with verified financial hardship without charge or at less than the market price.

Medicinal Alternatives (MAI) is committed to assisting those with verified financial hardships. Applicants who have a Verified Financial Hardship, i.e. are recipients of MassHealth, or Supplemental Security Income, or their income does not exceed 300% of the federal poverty level, adjusted for family size, shall qualify for MAI’s financial hardship program. MAI will provide patients with a financial affidavit form modeled after the form provided by the Supreme Judicial Council for use in the Courts to determine whether a patient qualifies for a Verified Financial Hardship per 105 CMR 725.004 and 105 CMR 725.100(A)(6).

All patients with a documented Verified Financial Hardship as defined by 105 CMR 725.004 will be provided reduced cost or free marijuana.

Based on current projections, MAI plans to provide free and low cost medicine at the following levels to patients with a Verified Financial Hardship:
• ≤100% of FPL: free up to 2 gram/week, 50% discount thereafter up to .25 ounce/month. Paraphernalia at cost;
• >100% but ≤200% of FPL: free up to 1 gram/week, 35% discount thereafter up to .25 ounce/month. Paraphernalia at cost + 10%; and
• >200% but ≤300% of FPL: free up to .5 gram/week, 20% discount thereafter up to .25 ounce/month. Paraphernalia at cost + 20%.

Information on this page has been reviewed by the applicant and where provided by the applicant, is accurate and complete, as indicated by the initials of the authorized signatory here: [Signature]

Management and Operations Profile – Page 29
37. Provide a summary of the training(s) that the RMD intends to provide to Dispensary Agents.

Medicinal Alternatives (MAI) agents will complete mandatory training that will be tailored to the roles and responsibilities of the job functions of each dispensary agent. MAI agents must complete training prior to performing job functions. At a minimum, 8 hours of on-going training will be required annually. All training records will include a signed statement of the agent indicating the date, time, and place they received training and the topics discussed, including the name and title of presenters.

Training, depending on agent position, will include:
- New agent orientation; Overview of the Act for Humanitarian Use of Medical Marijuana & 105 CMR 725.000
- Smoke, alcohol & drug free workplace
- Storage
- Patient & caregiver identification
- Compliance, regulation, & law
- Privacy & Confidentiality
- Cultivation & MLPs processing, safety, & security
- Dispensary safety & security & LAAs
- Emergency & incident management
- Inventory management & diversion prevention
- Manufacturing safety & security
- Waste disposal
- Community & patient interaction
- Record keeping & reporting
- Product handling & sanitation
- Transportation
- Advertising restrictions
- Whistleblowing
- Law enforcement interaction
- Internal audits
- Patients w/disabilities
- Testing/sampling
- Dispensing limits
- Packaging/labeling

Our SOPs also detail training evaluations & performance reviews.

Information on this page has been reviewed by the applicant and where provided by the applicant, is accurate and complete, as indicated by the initials of the authorized signatory here: 

Management and Operations Profile – Page 30
38. Will the Corporation provide worker's compensation coverage to the RMD's Dispensary Agents?
   Yes ☐  No ☑

39. Will the Corporation obtain professional and commercial insurance coverage?
   Yes ☐  No ☑

40. Describe the Corporation's plan to obtain liability insurance or place in escrow the required amount to be expended for coverage of liabilities.

MAI will contract with an insurance provider to maintain general liability insurance coverage for no less than $1,000,000 per occurrence & $2,000,000 in aggregate annually & product liability coverage for no less than $1,000,000 per occurrence & $2,000,000 in aggregate annually. The deductible for this policy will be no higher than $5,000 per occurrence.

If adequate coverage is unavailable in the marketplace at a reasonable rate, MAI will place in escrow at least $250,000 to be expended for coverage of liabilities. Any withdrawal from escrow will be replenished within 10 business days.

MAI will carry automobile coverage, as well as property and casualty coverage. Coverage to include business interruption protection. Replacement cost will be used to value all property ensuring a full recovery in event of a catastrophe. Business interruption coverage will allow MAI to continue paying employees, vendors, taxes, & fees during reconstruction, if necessary. It will also provide capital for any necessary emergency inventory purchases from another RMD.

MAI will also carry personal & advertising injury insurance, as well as employment practice liability coverage for directors & officers. Staff that transports cash or medical marijuana/MIPs will be bonded. RMD will consider additional coverage based on availability & a cost-benefit analysis.

MAI will keep reports documenting compliance with 725.105(Q) made in a manner & form determined by the DPH pursuant to 725.105(M).
SECTION F. CAPITAL CONTRIBUTORS

List all persons and entities known to date that are committed to contributing 5% or more of initial capital to operate the proposed RMD. For entities contributing initial capital to operate the proposed RMD, list the entity’s Chief Executive Officer/Executive Director and President/Chair of the Board of Directors.

Attach additional tables if needed.

<table>
<thead>
<tr>
<th>Individual Name</th>
<th>Amount of Initial Capital Committed</th>
<th>Percentage of Initial Capital Committed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Patricia K. DeCaro</td>
<td>$234,404.65</td>
<td>32.9%</td>
</tr>
<tr>
<td>Patricia K. DeCaro &amp; Michael G. DeCaro</td>
<td>$378,691.02</td>
<td>53.1%</td>
</tr>
<tr>
<td>David Goodman</td>
<td>$100,000.00</td>
<td>14%</td>
</tr>
<tr>
<td></td>
<td>$</td>
<td></td>
</tr>
<tr>
<td></td>
<td>$</td>
<td></td>
</tr>
</tbody>
</table>

Information on this page has been reviewed by the applicant, and where provided by the applicant, is accurate and complete, as indicated by the initials of the authorized signatory here: [Signature]
<table>
<thead>
<tr>
<th>Entity Name</th>
<th>Leadership Names</th>
<th>Amount of Initial Capital Committed</th>
<th>Percentage of Initial Capital Committed</th>
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<tr>
<td>N/A</td>
<td>Entity CEO/ED:</td>
<td>$</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Entity President/Chair:</td>
<td>$</td>
<td></td>
</tr>
<tr>
<td>N/A</td>
<td>Entity CEO/ED:</td>
<td>$</td>
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<tr>
<td></td>
<td>Entity President/Chair:</td>
<td>$</td>
<td></td>
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<td>Entity CEO/ED:</td>
<td>$</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Entity President/Chair:</td>
<td>$</td>
<td></td>
</tr>
</tbody>
</table>

Information on this page has been reviewed by the applicant, and where provided by the applicant, is accurate and complete, as indicated by the initials of the authorized signatory here: 

Management and Operations Profile – Page 33
ATTESTATIONS

Signed under the pains and penalties of perjury, I, the authorized signatory of the non-profit applicant corporation, agree and attest that all information included in this application is complete and accurate and that I have an ongoing obligation to submit updated information to the Department if the information presented within this application has changed.

[Signature]
Signature of Authorized Signatory

[Date]
Date Signed

Patsi Jean Hebert
Print Name of Authorized Signatory

President of the Board of Directors, Medicinal Alternatives, Inc.

Title of Authorized Signatory

I hereby attest that if the corporation is allowed to proceed to submit a Siting Profile, the corporation is prepared to comply with all Siting Profile requirements.

[Signature]
Signature of Authorized Signatory

[Date]
Date Signed

Patsi Jean Hebert
Print Name of Authorized Signatory

President of the Board of Directors, Medicinal Alternatives, Inc.

Title of Authorized Signatory

Information on this page has been reviewed by the applicant, and where provided by the applicant, is accurate and complete, as indicated by the initials of the authorized signatory here:
The Commonwealth of Massachusetts
William Francis Galvin
Secretary of the Commonwealth, Corporations Division
One Ashburton Place, 17th floor
Boston, MA 02108-1512
Telephone: (617) 727-9640

Articles of Organization
(General Laws, Chapter 180)

Identification Number: 001179410

ARTICLE I

The exact name of the corporation is:

MEDICINAL ALTERNATIVES, INC.

ARTICLE II

The purpose of the corporation is to engage in the following business activities:

A. To promote and provide natural and holistic medicine and education to registered patients and to the public for benevolent and medical purposes; and
B. To engage in any and all other purposes permitted to a corporation formed under Massachusetts General Laws, C. 180. B. notwithstanding any other provision of these articles. The corporation is organized exclusively for scientific and educational purposes as specified in section 501(c)(3) of the Internal Revenue Code of 1986, as amended, and shall not carry on any activities not permitted to be carried on by a corporation exempt from Federal Income Tax under section 501(c)(3) of the Internal Revenue Code of 1986, as amended. C. No part of the activities of activities of the corporation shall be carried on propaganda, or otherwise attempting, to influence legislation except as otherwise provided by internal revenue code section 501(h), or participating in, or intervening in (including the publication or distribution of statements), any political campaign on behalf of any candidate for public office. It is intended that the corporation shall be entitled to exemption from Federal Income Tax under section 501(c)(3) of the Internal Revenue Code and shall not be a private foundation under section 509(a) of the Internal Revenue Code. D. No part of the net earnings of the corporation shall inure to the benefit of any member, trustee, director, officer, of the corporation, or any private individual (except that reasonable compensation may be paid for services rendered to or for the corporation), and no member, trustee, officer shall be entitled to share in the distribution of any of the corporate assets upon dissolution of the corporation. E. The corporation may conduct business, carry on its operations, do all things lawful under and consistent with, and exercise all of the powers granted by, Massachusetts General Laws, Chapter 180, as now in force or as hereafter amended, and have offices in any jurisdiction within or without the United States. Although the corporation shall not be operated for the primary purpose of carrying on for profit a trade or business unrelated to its tax exempt purposes. F. The corporation may have and exercise all powers necessary or convenient to effect any or all of the purposes for which the corporation is formed; provided that no s
UCH POWER SHALL BE EXERCISED IN A MANNER INCONSISTENT WITH MASSACHUSETTS
GENERAL LAWS, CHAPTER 180 OR ANY OTHER CHAPTER OF THE GENERAL LAWS OF THE COMONWEALTH OR SECTION 501(C)(3) OF THE INTERNAL REVENUE CODE.

ARTICLE III

A corporation may have one or more classes of members. If it does, the designation of such classes, the manner of election or appointments, the duration of membership and the qualifications and rights, including voting rights, of the members of each class, may be set forth in the by-laws of the corporation or may be set forth below:

ARTICLE IV

Other lawful provisions, if any, for the conduct and regulation of the business and affairs of the corporation, for its voluntary dissolution, or for limiting, defining, or regulating the powers of the corporation, or of its directors or members, or of any class of members, are as follows:

(If there are no provisions state "NONE")

A. THE CORPORATION SHALL HAVE THE FOLLOWING POWERS IN FURTHERANCE OF ITS CORPORATE PURPOSES. (1) THE CORPORATION SHALL HAVE PERPETUAL SUCCESSION IN ITS CORPORATE NAME. (2) THE CORPORATION MAY SUCE AND BE SUED. (3) THE CORPORATION MAY HAVE A CORPORATE SEAL WHICH IT MAY ALTER AT THE PLEASE OF THE BOARD OF DIRECTORS. (4) THE CORPORATION MAY ELECT OR APPOINT DIRECTORS, OFFICERS, EMPLOYEES AND OTHER AGENTS, FIX THEIR COMPENSATION AND DEFINE THEIR DUTIES AND OBLIGATIONS. (5) THE CORPORATION MAY PURCHASE, RECEIVE, TAKE BY GRANT, GIFT, DEVISE, BEQUEST OR OTHERWISE ACQUIRE, OWN, HOLD, IMPROVE, EMPLOY, USE AND OTHERWISE DEAL IN AND WITH REAL OR PERSONAL PROPERTY, OR ANY INTEREST THEREIN, WHEREVER SITUATED, IN AN UNLIMITED MANNER, AND ALSO CONSTRUCT, MAINTAIN AND OPERATE IMPROVEMENTS THEREON. (6) THE CORPORATION MAY SOLICIT AND RECEIVE CONTRIBUTIONS FROM ANY AND ALL SOURCES, MAY ASSESS MEMBERSHIP DUES, AND MAY RECEIVE AND HOLD, IN TRUST OR OTHERWISE, FUNDS RECEIVED BY GIFTS OR BEQUESTS. (7) THE CORPORATION MAY SELL, ASSIGN, CONVEY, LEASE, EXCHANGE, TRANSFER OR OTHERWISE DISPOSE OF, OR MORTGAGE, PLEDGE, ENCUMBER, OR CREATE A SECURITY INTEREST IN, ALL OR ANY OF ITS PROPERTY, OR ANY INTEREST THEREIN, WHEREVER SITUATED. (8) THE CORPORATION MAY PURCHASE, TAKE, RECEIVE, SUBSCRIBE FOR, OR OTHERWISE ACQUIRE, OWN, HOLD, VOTE, EMPLOY, SELL, LEND, LEASE, EXCHANGE, TRANSFER, OR OTHERWISE DISPOSE OF, MORTGAGE, PLEDGE, USE AND OTHERWISE DEAL IN AND WITH, BONDS AND OTHER OBLIGATIONS, SHARES, OR OTHER SECURITIES OR INTERESTS ISSUED BY OTHERS, WHETHER ENGAGED IN SIMILAR OR DIFFERENT BUSINESS, GOVERNMENTAL, OR OTHER ACTIVITIES. (9) THE CORPORATION MAY MAKE CONTRACTS, GIVE GUARANTEES AND INCUR LIABILITIES, BORROW MONEY AT SUCH RATES OF INTEREST AS THE CORPORATION MAY DETERMINE, ISSUE ITS NOTES, BONDS, AND OTHER OBLIGATIONS, AND SECURE ANY OF ITS OBLIGATIONS BY MORTGAGE, PLEDGE OR ENCUMBRANCE OF, OR SECURITY INTEREST IN, ALL OR ANY OF ITS PROPERTY OR ANY INTEREST THEREIN, WHEREVER SITUATED. (10) THE CORPORATION MAY LEND MONEY, INVEST AND RE-INVEST ITS FUNDS, AND TAKE AND HOLD REAL AND PERSONAL PROPERTY AS SECURITY FOR THE PAYMENT OF FUNDS SO LOANED OR INVESTED. (11) THE CORPORATION MAY PAY PENSIONS, ESTABLISH AND CARRY OUT PENSION, SAVINGS, THRIFT AND OTHER RETIREMENT, INCENTIVE AND BENEFIT PLANS, TRUSTS AND PROVISIONS FOR ANY OR ALL OF ITS DIRECTORS, OFFICERS AND EMPLOYEES. (12) THE CORPORATION MAY PARTICIPATE AS A SUBSCRIBER IN THE EXCHANGE OF INSURANCE CONTRACTS SPECIFIED IN MASSACHUSETTS GENERAL LAWS, CHAPTER 175, SECTION 94B AS NOW IN FORCE OR AS HERE AFTER AMENDED. (13) THE CORPORATION MAY MAKE DONATIONS IN SUCH AMOUNTS AS THE MEMBERS OR DIRECTORS SHALL DETERMINE, IRRESPECTIVE OF CORPORATE BENEFIT, FOR THE PUBLIC WELFARE OR FOR THE COMMUNITY FUND, HOSPITAL, CHARITABLE, RE
LIGIOUS, EDUCATIONAL, SCIENTIFIC, CIVIC, OR SIMILAR PURPOSES, AND IN TIME OF WAR OR OTHER NATIONAL EMERGENCY IN AID THEREOF; PROVIDED, HOWEVER, THAT AS LONG AS THE CORPORATION IS ENTITLED TO EXEMPTION FROM FEDERAL INCOME TAX UNDER SECTION 501(C)(3) OF THE INTERNAL REVENUE CODE, IT SHALL MAKE NO CONTRIBUTION FOR OTHER THAN RELIGIOUS, CHARITABLE, SCIENTIFIC, TESTING FOR PUBLIC SAFETY, LITERARY OR EDUCATIONAL PURPOSES, OR FOR THE PREVENTION OF CRUELTY TO CHILDREN OR ANIMALS. (14) THE CORPORATION MAY BE AN INCORPORATOR OF OTHER CORPORATIONS OF ANY TYPE OR KIND. (15) THE CORPORATION MAY BE A PARTNER IN ANY BUSINESS ENTERPRISE WHICH IT WOULD HAVE POWER TO CONDUCT BY ITSSELF. (16) THE DIRECTORS MAY MAKE, AMEND OR REPEAL THE BY-LAWS, IN WHOLE OR IN PART, EXCEPT WITH RESPECT TO ANY PROVISION THEREOF WHICH BY LAW OR THE BY-LAWS REQUIRES ACTION BY THE MEMBERS. (B) ADDITIONAL OTHER LAWFUL PROVISIONS FOR THE CONDUCT AND REGULATION OF THE BUSINESS AND AFFAIRS OF THE CORPORATION, INCLUDING ITSELF VOLUNTARY DISSOLUTION: (1) MEETINGS OF THE MEMBERS AND DIRECTORS MAY BE HELD ANYWHERE IN THE UNITED STATES, (2) THE CORPORATION MAY, TO THE EXTENT LEGALLY PERMISSIBLE, AND ONLY TO THE EXTENT THAT THE STATUS OF THE CORPORATION AS AN ORGANIZATION EXEMPT UNDER SECTION 501(C)(3) OF THE INTERNAL REVENUE CODE IS NOT AFFECTED THEREBY, INDEMNIFY EACH OF ITS DIRECTORS, OFFICERS, EMPLOYEES AND OTHER AGENTS (INCLUDING PERSONS WHO SERVE AT ITS REQUEST AS DIRECTORS, OFFICERS, EMPLOYEES OR OTHER AGENTS OF ANOTHER ORGANIZATION IN WHICH IT HAS AN INTEREST) AGAINST ALL LIABILITIES AND EXPENSES, INCLUDING AMOUNTS PAID IN SATISFACTION OF JUDGMENTS, IN COMPROMISE OR AS FINES AND PENALTIES, AND GOURSES REASONABLY INCURRED BY HIM HER IN CONNECTION WITH THE DEFENSE OR DISPOSITION OF ANY ACTION, SUIT OR OTHER PROCEEDINGS, WHETHER CIVIL OR CRIMINAL, IN WHICH HE SHE MAY BE INVOLVED OR WITH WHICH HE SHE MAY BE THREATENED, WHILE IN OFFICE OR THEREAFTER, BY REASON OF HIS HER BEING OR HAVING BEEN SUCH A DIRECTOR, OFFICER, EMPLOYEE OR AGENT, EXCEPT WITH RESPECT TO ANY MATTER AS TO WHICH HE SHE SHALL HAVE BEEN ADJUDICATED IN ANY PROCEEDING NOT TO HAVE ACTED IN GOOD FAITH IN THE REASONABLE BELIEF THAT HIS HER ACTION WAS IN THE BEST INTERESTS OF THE CORPORATION; PROVIDED, HOWEVER, THAT AS TO ANY MATTER DISPOSED OF BY A COMPROMISE PAYMENT BY SUCH DIRECTOR, OFFICER, EMPLOYEE OR AGENT, PURSUANT TO A Consent DECREE OR OTHERWISE, NO INDEMNIFICATION EITHER FOR SAID PAYMENT OR FOR ANY OTHER EXPENSES SHALL BE PROVIDED UNLESS SUCH COMPROMISE SHALL BE APPROVED AS IN THE BEST INTERESTS OF THE CORPORATION. AFTER NOTICE THAT IT INVOLVES SUCH INDEMNIFICATION, BY A MAJORITY OF THE DISINTERESTED DIRECTORS THEN IN OFFICE, EXPENSES, INCLUDING COUNSEL FEES, REASONABLY INCURRED BY ANY SUCH DIRECTOR, OFFICER, TRUSTEE, EMPLOYEE OR AGENT IN CONNECTION WITH THE DEFENSE OR DISPOSITION OF ANY SUCH ACTION, SUIT OR OTHER PROCEEDING MAY BE PAID FROM TIME TO TIME BY THE CORPORATION IN ADVANCE OF THE FINAL DISPOSITION THEREOF UPON RECEIPT OF AN undertaking BY SUCH INDIVIDUAL TO REPAY THE AMOUNTS SO PAID TO THE CORPORATION IF HE SHE SHALL BE ADJUDICATED TO BE NOT ENTITLED TO INDEMNIFICATION UNDER MASSACHUSETTS GENERAL LAWS, CHAPTER 180, SECTION 6, THE RIGHT OF INDEMNIFICATION HEREBY PROVIDED SHALL NOT BE EXCLUSIVE OR AFFECT ANY OTHER RIGHTS TO WHICH ANY DIRECTOR, OFFICER, EMPLOYEE OR AGENT MAY BE ENTITLED, NOTHING CONTAINED HEREIN SHALL AFFECT ANY RIGHTS TO INDEMNIFICATION TO WHICH CORPORATE PERSONNEL MAY BE ENTITLED BY CONTRACT OR OTHERWISE UNDER LAW. AS USED IN THIS PARAGRAPH, THE TERMS "DIRECTORS", "OFFICER", "EMPLOYEE", AND "AGENT" INCLUDE THEIR RESPECTIVE HEIRS, EXECUTORS AND ADMINISTRATORS, AND AN "INTERESTED" DIRECTOR IS ONE AGAINST WHOM IN SUCH CAPACITY THE PROCEEDINGS IN QUESTION OR ANOTHER PROCEEDING ON THE SAME OR SIMILAR GROUNDS IS THEN PENDING. (3) UPON THE LIQUIDATION OR DISSOLUTION OF THE CORPORATION, AFTER PAYMENT OF ALL OF THE LIABILITIES OF THE CORPORATION, OR DUE PROVISION THEREOF, ALL OF THE ASSETS OF THE CORPORATION SHALL BE DISTRIBUTED TO ONE OR MORE ORGANIZATIONS CREATED AND OPERATED SOLELY
FOR ONE OR MORE EXEMPT PURPOSES WITHIN THE MEANING OF SECTION 501(C)(3) OF THE INTERNAL REVENUE CODE OR CORRESPONDING SECTION OF ANY FUTURE FEDERAL TAX CODE, OR SHALL BE DISTRIBUTED TO THE UNITED STATES GOVERNMENT, OR TO A STATE OR LOCAL GOVERNMENT, FOR A PUBLIC PURPOSE.

Notes: The preceding four (4) articles are considered to be permanent and may only be changed by filing appropriate Articles of Amendment.

ARTICLE V
The by-laws of the corporation have been duly adopted and the initial directors, president, treasurer and clerk or other presiding, financial or recording officers, whose names are set out on the following page, have been duly elected.

ARTICLE VI
The effective date of organization of the corporation shall be the date approved and filed by the Secretary of the Commonwealth. If a later effective date is desired, specify such date which shall not be more than thirty days after the date of filing.

ARTICLE VII
The information contained in Article VII is not a permanent part of the Articles of Organization.

a. The street address (post office boxes are not acceptable) of the principal office of the corporation in Massachusetts is:

| No. and Street: | 120 GILBOA STREET |
| City or Town:    | DOUGLAS         |
| State:           | MA              |
| Zip:             | 01516           |
| Country:         | USA             |

b. The name, residential street address and post office address of each director and officer of the corporation is as follows:

<table>
<thead>
<tr>
<th>Title</th>
<th>Individual Name</th>
<th>Address (no PO Box)</th>
<th>Expiration of Term</th>
</tr>
</thead>
<tbody>
<tr>
<td>PRESIDENT</td>
<td>MICHAEL DECARO</td>
<td></td>
<td>Next Annual Meeting</td>
</tr>
<tr>
<td>TREASURER</td>
<td>PATRICIA DECARO</td>
<td></td>
<td>Next Annual Meeting</td>
</tr>
<tr>
<td>CLERK</td>
<td>PETER DECARO</td>
<td></td>
<td>Next Annual Meeting</td>
</tr>
<tr>
<td>DIRECTOR</td>
<td>MICHAEL DECARO</td>
<td></td>
<td>Next Annual Meeting</td>
</tr>
<tr>
<td>DIRECTOR</td>
<td>PATRICIA DECARO</td>
<td></td>
<td>Next Annual Meeting</td>
</tr>
<tr>
<td>DIRECTOR</td>
<td>PETER DECARO</td>
<td></td>
<td>Next Annual Meeting</td>
</tr>
<tr>
<td>DIRECTOR</td>
<td>FREDERICK J. JACCARINO</td>
<td></td>
<td>Next Annual Meeting</td>
</tr>
</tbody>
</table>
c. The fiscal year (i.e., tax year) of the business entity shall end on the last day of the month of: May

d. The name and business address of the resident agent, if any, of the business entity is:

Name: SAMANTHA P. MCDONALD, ESQ
No. and Street: FLETCHER TILTON PC
370 MAIN STREET
City or Town: WORCESTER State: MA Zip: 01608 Country: USA

I/We, the below signed incorporator(s), do hereby certify under the pains and penalties of perjury that I/we have not been convicted of any crimes relating to alcohol or gaming within the past ten years. I/We do hereby further certify that to the best of my/our knowledge the above-named officers have not been similarly convicted. If so convicted, explain:

IN WITNESS WHEREOF AND UNDER THE PAINS AND PENALTIES OF PERJURY, I/we, whose signature(s) appear below as incorporator(s) and whose name(s) and business or residential address (es) beneath each signature do hereby associate with the intention of forming this business entity under the provisions of General Law, Chapter 180 and do hereby sign these Articles of Organization as incorporator(s) this 29 Day of June, 2015. (If an existing corporation is acting as incorporator, type in the exact name of the business entity, the state or other jurisdiction where it was incorporated, the name of the person signing on behalf of said business entity and the title he/she holds or other authority by which such action is taken.)

PETER DECARO
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:

June 29, 2015 10:27 AM

[Signature]

WILLIAM FRANCIS GALVIN

Secretary of the Commonwealth
The Commonwealth of Massachusetts
William Francis Galvin

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

Certificate of Change of Directors or Officers of Non-Profit Corporations
(General Laws, Chapter 180, Section 6D)

Identification Number: 001179410

I, PATCI JEAN HEBERT, Clerk, Assistant Clerk, of MEDICINAL ALTERNATIVES, INC., having a principal office at: 120 GILBOA STREET, DOUGLAS, MA 01516 USA

certify that pursuant to General Laws, Chapter 180, Section 6D, a change in the directors and/or the president, treasurer and/or clerk of said corporation has been made and that the name, residential street address, and expiration of term of the president, treasurer, clerk and each director are as follows: (Please provide the name and residential street address of the assistant clerk if he/she is executing this certificate of change. Also, include the names of any additional officers of the corporation.)

<table>
<thead>
<tr>
<th>Title</th>
<th>Individual Name</th>
<th>Address (no PO Box)</th>
<th>Expiration of Term</th>
</tr>
</thead>
<tbody>
<tr>
<td>PRESIDENT</td>
<td>PATCI JEAN HEBERT</td>
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<td>Next Annual Meeting</td>
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<tr>
<td>TREASURER</td>
<td>PATCI JEAN HEBERT</td>
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</tr>
<tr>
<td>CLERK</td>
<td>PATCI JEAN HEBERT</td>
<td></td>
<td>Next Annual Meeting</td>
</tr>
<tr>
<td>DIRECTOR</td>
<td>WILFRED J. BARD JR</td>
<td></td>
<td>Next Annual Meeting</td>
</tr>
<tr>
<td>DIRECTOR</td>
<td>PATCI JEAN HEBERT</td>
<td></td>
<td>Next Annual Meeting</td>
</tr>
<tr>
<td>DIRECTOR</td>
<td>DENIS LATOUR</td>
<td></td>
<td>Next Annual Meeting</td>
</tr>
<tr>
<td>DIRECTOR</td>
<td>JAMES JOSEPH SULLIVAN</td>
<td></td>
<td>Next Annual Meeting</td>
</tr>
</tbody>
</table>

SIGNED UNDER THE PENALTIES OF PERJURY, this 26 Day of October, 2015, PATCI JEAN HEBERT, Signature of Applicant.
The Commonwealth of Massachusetts
William Francis Galvin
Secretary of the Commonwealth, Corporations Division
One Ashburton Place, 17th floor
Boston, MA 02108-1512
Telephone: (617) 727-9640

Certificate of Change of Directors or Officers of Non-Profit Corporations
(General Laws, Chapter 180, Section 6D)

Identification Number: 001179410

I. PATCI JEAN HEBERT  X  Clerk  ___ Assistant Clerk ,
of MEDICINAL ALTERNATIVES, INC.,
having a principal office at: 120 GILBOA STREET DOUGLAS, MA 01516 USA

certify that pursuant to General Laws, Chapter 180, Section 6D, a change in the directors and/or the president, treasurer and/or clerk of said corporation has been made and that the name, residential street address, and expiration of term of the president, treasurer, clerk and each director are as follows: (Please provide the name and residential street address of the assistant clerk if he/she is executing this certificate of change. Also, include the names of any additional officers of the corporation.)

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<th>Address (no PO Box)</th>
<th>Expiration of Term</th>
</tr>
</thead>
<tbody>
<tr>
<td>PRESIDENT</td>
<td>PATCI JEAN HEBERT</td>
<td>Address, City or Town, State, Zip Code</td>
<td>Next Annual Meeting</td>
</tr>
<tr>
<td>TREASURER</td>
<td>PATCI JEAN HEBERT</td>
<td></td>
<td>Next Annual Meeting</td>
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<tr>
<td>DIRECTOR</td>
<td>PATCI JEAN HEBERT</td>
<td></td>
<td>Next Annual Meeting</td>
</tr>
</tbody>
</table>

SIGNED UNDER THE PENALTIES OF PERJURY, this 30 Day of June, 2015,
PATCI JEAN HEBERT, Signature of Applicant.
To Whom It May Concern:

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

MEDICINAL ALTERNATIVES, INC.

is a domestic corporation organized on June 29, 2015

I further certify that there are no proceedings presently pending under the Massachusetts General Laws Chapter 180 section 26 A, for revocation of the charter of said corporation; that the State Secretary has not received notice of dissolution of the corporation pursuant to Massachusetts General Laws. Chapter 180, Section 11. 11A. or 11B; that said corporation has filed all annual reports, and paid all fees with respect to such reports, and so far as appears of record said corporation has legal existence and is in good standing with this office.

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

William Francis Galvin
Secretary of the Commonwealth

Certificate Number: 15105608310
Verify this Certificate at: http://corp.sec.state.ma.us/CorpWeb/Certificates/Verify.aspx
Processed by: nmc
BY-LAWS OF MEDICINAL ALTERNATIVES, INC.
A MASSACHUSETTS NON-PROFIT CORPORATION

ARTICLE I
General Provisions

Section 1.1 Name. The name of this Non-Profit corporation is Medicinal Alternatives, Inc. and shall herein be referred to as the "Non-Profit."

Section 1.2 Offices. The principal business office of the Non-Profit shall be at 109 State Street, Suite 404, Boston, Massachusetts 02109. The Non-Profit may also have offices at such other places as the Non-Profit may require.

Section 1.3 Fiscal Year. The fiscal year of the Non-Profit shall begin on January 1 and end on the following December 31 of each year.

Section 1.4 No Voting Members. The Non-Profit shall have no voting members. All powers of the Non-Profit shall be held by the board of directors. Any action or vote required or permitted by any law, rule, or regulation to be taken by members shall be taken by action or vote of the same percentage of the board of directors of the Non-Profit. No person now or hereafter designated by the Non-Profit as a "member" for fundraising or other purposes shall be or be deemed to be a member for purposes of the Articles of Organization or By-Laws of the Non-Profit nor shall such person have any voting or fiduciary rights or responsibilities of the Non-Profit.

ARTICLE II
Statement of Purposes

The Non-Profit is organized for non-profit purposes including, but not limited to, providing patients with knowledgeable, dedicated, compassionate herbal medicine expertise, and high quality, affordable medicine. As permitted by law, the Non-Profit may engage in any and all activities in furtherance of, related to, or incidental to these purposes, the activities being lawful for a non-profit formed under Chapter 180 of the General Laws of Massachusetts. Any revenue from the Non-Profit shall be used solely in furtherance of the Non-Profit's purposes.

ARTICLE III
Board of Directors

Section 3.1 Authority. The business and affairs of the Non-Profit shall be controlled and governed by the board of directors, which shall have the right to exercise all powers of the Non-Profit as permitted by law.

Section 3.2 Composition. The number of directors and the manner by which new directors are nominated and appointed shall be determined by the directors.

Section 3.3 Terms of Office. The board of directors shall determine the length and number of terms to be served by directors.

Medicinal Alternatives, Inc.
Corporate By-Laws
**Section 3.4 Meetings.** The board of directors shall hold annual meetings each year and may select the time and place for annual and other meetings of the board. The board of directors must meet a minimum of once per quarter at the principal place of business. Other meetings of the board of directors may be called by the president or by a majority of the directors then in office by delivering notice in writing, of the date, time, place, and purpose of such meeting, to all directors at least three (3) days in advance of such meeting.

**Section 3.5 Quorum and Voting.** A majority of the board of directors shall constitute a quorum for the transaction of business at any meeting of the board. At any meeting of the board of directors at which a quorum is present, a majority of those directors present shall decide any matter, unless a different vote is specified by law, the Articles of Organization, or these By-Laws. A tie vote shall result in the motion or action being defeated.

**Section 3.6 Meetings by Remote Communication.** One or more directors may attend any annual, regular, special, or committee meeting of the board through telephonic, electronic, or other means of communication by which all directors have the ability to fully and equally participate in all discussions and voting on a substantially simultaneous basis. Such participation shall constitute presence in person at such meeting.

**Section 3.7 Action Without a Meeting.** Any action required or permitted to be taken at any board meeting may be taken without a meeting if a consent in writing, setting forth the action to be taken, shall be signed by all of the directors with respect to such subject matter. Such consent, which may be signed in counterparts, shall have the same force and effect as a vote of the board of directors.

**Section 3.8 Waiver of Notice for Meetings.** Whenever any notice of a meeting is required to be given to any director under the Articles of Organization, these By-Laws, or the laws of the Commonwealth of Massachusetts, a waiver of notice in writing signed by the director, whether before or after the time of the meeting, shall be equivalent to the giving of such notice.

**Section 3.9 Committees.** By majority vote, the board of directors may create such standing and special committees as it determines to be in the best interest of the Non-Profit. The board of directors shall determine the duties, powers, and composition of such committees, except that the board shall not delegate to such committees those powers which by law may not be delegated. Each such committee shall submit to the board of directors at such meetings as the board may designate, a report of the actions and recommendations of such committees for consideration and approval by the board of directors. Any committee may be terminated at any time by the board of directors.

**Section 3.10 Compensation.** Directors, as such, shall not receive any salaries for their services on the board, but directors shall not be precluded from serving the Non-Profit in any other capacity and receiving reasonable compensation.
Section 3.11  Resignation. Any director may resign by delivering a written resignation to the Non-Profit at its principal office or to the president or clerk. Such resignation shall be effective upon receipt unless it is specified to be effective at some later time.

Section 3.12  Removal. Any director may be removed with or without cause, by a vote of a majority of the entire board of directors at any meeting of the board of directors.

Section 3.13  Vacancies. Any vacancy occurring in the board of directors shall be filled by the board of directors. A director elected to fill a vacancy shall be elected for the unexpired term of his or her predecessor in office.

ARTICLE IV  
Officers

Section 4.1  Officers. The officers of the Non-Profit shall be a president, a treasurer and a clerk, and such other officers as may be elected in accordance with the provisions of this Article IV.

Section 4.2  Appointment. The officers of the Non-Profit shall be appointed by the board of directors at least one time every two years. Each officer shall hold office until a successor shall have been elected and qualified.

Section 4.3  Vacancies. A vacancy in any office because of death, resignation, disqualification, or otherwise may be filled by the board of directors for the unexpired portion of the term.

Section 4.4  Removal. Any officer may be removed with or without cause, by a vote of a majority of the entire board of directors at any meeting of the board of directors.

Section 4.5  President. The president shall preside at all meetings of the board of directors. The president, or other proper officer or agent of the Non-Profit authorized by the board of directors, may sign any deeds, mortgages, bonds, contracts, or other instruments which the board of directors has authorized to be executed. The president shall perform all duties incident to the office of president and such other duties as may be prescribed by the board of directors from time to time.

Section 4.6  Treasurer. The treasurer, or other proper officer or agent of the Non-Profit authorized by the board of directors, shall have charge and custody of and be responsible for all funds and securities of the Non-Profit; receive and give receipt for moneys due and payable to the Non-Profit from any source whatsoever, and deposit all such moneys in the name of the Non-Profit in such banks, trust companies, or other depositories as shall be selected by the board of directors; and in general perform all of the duties incident to the office of treasurer and such others as may from time to time be assigned by the board of directors.

Section 4.7  Clerk. The clerk shall keep the minutes of the meetings of the board of directors in one or more books provided for that purpose; ensure that all notices are given in
accordance with the provisions of these By-Laws; be custodian of the corporate records; and in
general perform all such duties as may from time to time be assigned by the board of directors.

ARTICLE V
Corporate Transactions

Section 5.1 Contracts. The board of directors may authorize any officer or officers, agent or agents of the Non-Profit in addition to the officers so authorized by these By-Laws, to enter into any contract or execute and deliver any instrument in the name of and on behalf of the Non-Profit, and such authority may be general or confined by specific instances.

Section 5.2 Indebtedness. All checks, drafts, or orders for the payment of money, notes, or other evidence of indebtedness issued in the name of the Non-Profit, shall be signed by the president or treasurer, or such other officer or agent of the Non-Profit as from time to time may be determined by the board of directors. In the absence of such determination of the board, such instruments shall be signed by the president or treasurer of the Non-Profit.

Section 5.3 Deposits. All funds of the Non-Profit shall be deposited from time to time to the credit of the Non-Profit in such banks, trust companies, brokerages, or other depositories as the board of directors shall select.

ARTICLE VI
Books and Records

The Non-Profit shall keep at the principal office of the Non-Profit correct and complete books and records of account; minutes of the proceedings of board of directors; and a register of the names and addresses of the directors of the Non-Profit. All books, and records of the Non-Profit may be inspected by any director, or agent or attorney thereof, for any proper purpose at any reasonable time.

ARTICLE VII
Restrictions on Activities

The Non-Profit shall operate on a non-profit basis for the benefit of registered qualifying patients. Such corporation must ensure that revenue of the Non-Profit is used solely in furtherance of its nonprofit purpose. Any contract with the Non-Profit that requires the aggregate expenditure by Non-Profit to a third party in excess of one hundred fifty thousand ($150,000.00) dollars shall be approved by a majority vote of the disinterested directors.

ARTICLE VIII
Dissolution

In the event of dissolution of the Non-Profit, the board of directors shall, after paying or making provisions for the payment of all of the liabilities of the Non-Profit, dispose of all the assets of the Non-Profit exclusively for the purposes of the Non-Profit, as the board of directors shall determine, in accordance with the statutes of the Commonwealth of Massachusetts.

Medicinal Alternatives, Inc.
Corporate By-Laws
ARTICLE IX
Conflicts of Interest

Whenever a director or officer has a financial or personal interest in any matter coming before the board of directors, the affected person shall: (a) fully disclose the nature of the interest and (b) withdraw from discussion, lobbying, and voting on the matter. Any transaction or vote involving a potential conflict of interest shall be approved only when a majority of disinterested directors determine that it is in the best interest of the Non-Profit to do so. The minutes of meetings at which such votes are taken shall record such disclosure, abstention and rationale for approval. This Article IX may be further defined in applicable policy adopted by the board or directors.

ARTICLE X
Personal Liability

No officer or director of the Non-Profit shall be personally liable to the Non-Profit for monetary damages for, or arising out of, a breach of fiduciary duty as an officer or director notwithstanding any provision of law imposing such liability; provided, however, that the foregoing shall not eliminate or limit the liability of an officer or director to the extent that such liability is imposed by applicable law (a) for a breach of the officer’s or director’s duty of loyalty to the Non-Profit or its members, (b) for acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of applicable state or local law, or (c) for any transaction from which the officer or director derived an improper personal benefit.

ARTICLE XI
Indemnification

The Non-Profit shall, to the extent legally permissible, indemnify each person who may serve or who has served at any time as an officer or director of the Non-Profit against all expenses and liabilities, including, without limitation, counsel fees, judgments, fines, excise taxes, penalties and settlement payments, reasonably incurred by or imposed upon such person in connection with any threatened, pending or completed action, suit or proceeding in which he or she may become involved by reason of his or her service in such capacity; provided that no indemnification shall be provided for any such person with respect to any matter as to which he or she shall have been finally adjudicated in any proceeding not to have acted in good faith in the reasonable belief that such action was in the best interests of the Non-Profit; and further provided that any compromise or settlement payment shall be approved by a majority vote of a quorum of directors who are not at that time parties to the proceeding.

The indemnification provided hereunder shall inure to the benefit of the heirs, executors and administrators of persons entitled to indemnification hereunder. The right of indemnification under this Article XI shall be in addition to and not exclusive of all other rights to which any person may be entitled.
This Article XI constitutes a contract between the Non-Profit and the indemnified officers and directors. No amendment or repeal of the provisions of this Article XI which adversely affects the right of an indemnified officer or director under this Article XI shall apply to such officer or director with respect to those acts or omissions which occurred at any time prior to such amendment or repeal.

ARTICLE XII
Amendments to By-Laws

These By-Laws may be amended or repealed by a majority vote of the entire board of directors.

ARTICLE XIII
Policies

The board of directors may adopt policies that shall be incorporated into these By-Laws. The following policies have been adopted and incorporated herein:

Appendix 1: Conflict of Interest Policy
Appendix 2: Whistleblower Policy
Appendix 3: Document Retention and Destruction Policy
Appendix 4: Compensation Setting Policy
Appendix 5: Comprehensive Information Security Policy
Appendix 6: Antitrust Policy

I, Patci Jean Hebert, the Clerk of the Board of Directors attest that these By-Laws with the incorporated Appendices were adopted by Medicinal Alternatives, Inc. on October 25, 2015, by a duly authorized vote of the Board.

Patci Jean Hebert
Clerk of the Board
Appendix 1

MEDICINAL ALTERNATIVES, INC.
CONFLICT OF INTEREST POLICY

I. Definitions

For purposes of this policy, the term "interest" shall include any personal connection or connection as a director, officer, member, stockholder, shareholder, partner, manager, trustee, beneficiary, employee or consultant of any concern on the part of a director, officer or key employee of Medicinal Alternatives, Inc. ("Non-Profit"), or his/her immediate family member.

The term "concern" shall mean any corporation, association, trust, partnership, limited liability group, firm, person or entity other than the Non-Profit.

II. Policy

No director, officer or key employee of the Non-Profit shall be disqualified from holding any office or post in the Non-Profit by reason of any interest in any concern. A director, officer or key employee of the Non-Profit shall not be disqualified from engaging, either as vendor, purchaser or otherwise, or contracting or entering into any transaction with the Non-Profit or with any entity of which the Non-Profit is an affiliate, provided, however, that the following precautions are undertaken:

1. The interest of such director, officer or key employee is fully disclosed to the board of directors prior to its entering into the transaction.

2. No interested director, officer or key employee may vote or lobby (lobbying shall not include presenting to the board or a director the benefits of the transaction) on the matter or be counted in determining the existence of a quorum at the meeting of the board of directors at which such matter is voted upon.

3. Any transaction in which a director, officer or key employee has an interest shall be duly approved by the disinterested directors as being in the best interest of the Non-Profit. The disinterested directors shall seek and examine comparison data, showing the availability and price of alternative transactions, in making such determination.

4. Payments to the interested director, officer, or key employee shall be reasonable and shall not exceed fair market value.

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5. The minutes of the meeting at which the disinterested directors vote on the transaction shall reflect that disclosure of the potential conflict was made, that the interested director(s) abstained from voting, the rationale for approval, and how each disinterested director voted. The minutes shall be prepared and finalized within thirty (30) days of such meeting.

Directors, officers and key employees are required to disclose interests that could give rise to conflicts at least annually.


Acici Jean Hebert, Clerk,
Medicinal Alternatives, Inc.
Appendix 2

MEDICINAL ALTERNATIVES, INC.
WHISTLEBLOWER POLICY

I. Expectation

Medicinal Alternatives, Inc. (the “Non-Profit”) expects directors, officers and employees to observe high ethical standards in carrying out their responsibilities and to comply with all applicable laws and regulations.

II. Open Door Policy

If any director, officer or employee has complaints, concerns, or questions as to the ethics or legality of a particular action taken by another director, officer or employee, he/she is encouraged to raise such complaints, concerns or questions with the relevant individual. With respect to directors, the relevant individual is the president of the board of directors or any other director. With respect to officers and employees, the relevant individual is the Chief Executive Officer, if there is one in office, and if not, any member of the board. In the event the director, officer or employee believes there may have been a legal transgression, and that it is not reasonable to raise the issue with a board member or the Chief Executive Officer, he/she should contact an outside attorney. Anyone filing a complaint concerning a violation or suspected violation of a law, regulation or ethical requirement must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Individuals making baseless or malicious accusations will be disciplined up to and including termination.

III. Requirement of Investigation

Within a reasonable time of receiving a complaint, concern or question regarding compliance with a law, regulation or ethics requirement, the Chief Executive Officer and/or board member shall open an investigation into the matter and pursue it to resolution. Should the Chief Executive Officer or board member find that a law, regulation or ethics requirement has been violated, appropriate action should be taken.

IV. Confidentiality

To the degree possible, the names of the individuals reporting under this Whistleblower Policy shall be kept confidential.

V. Protection from Retaliatory Action

Neither the Non-Profit nor its directors, officers, or employees may take any negative employment or other retaliatory action against any director, officer or employee who in good faith reports a violation of a law or regulatory requirement. A director, officer, or employee who retaliates against
someone who has reported a violation in good faith is subject to discipline including, but not limited to, termination of employment.

VI. General Policy

This general policy is not a contract and it may be rescinded or amended at any time by the Non-Profit. It is not intended to and does not create any legally enforceable rights whatsoever for any employee.


Patti Jean Hebert, Clerk,
Medicinal Alternatives, Inc.
Appendix 3

MEDICINAL ALTERNATIVES, INC.
DOCUMENT RETENTION AND DESTRUCTION POLICY

I. Retention Policy

Medicinal Alternatives, Inc. (the “Non-Profit”) takes seriously its obligations to preserve information relating to litigation, audits, and investigations. The information listed in the retention schedule below is intended as a guideline and may not contain all the records the Non-Profit may be required to keep in the future, and may include records that the Non-Profit is not required to keep.

From time to time, the Non-Profit may suspend the destruction of records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, government investigations, or similar proceedings.

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<tr>
<th>File Category</th>
<th>Item</th>
<th>Retention Period</th>
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<tr>
<td>Corporate Records</td>
<td>By-Laws and Articles of Organization</td>
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<td>Board resolutions</td>
<td>Permanent</td>
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<td>Board and committee meeting agendas and minutes</td>
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<td>Conflict-of-interest disclosure forms</td>
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<td>Finance and Administration</td>
<td>Financial statements (audited)</td>
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<td>Auditor management letters</td>
<td>7 years</td>
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<td>Payroll records</td>
<td>7 years</td>
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<td></td>
<td>Check register and checks</td>
<td>7 years</td>
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<td></td>
<td>Bank deposits and statements</td>
<td>7 years</td>
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<td>Chart of accounts</td>
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<td>General ledgers and journals (includes bank reconciliations)</td>
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<td>Investment performance reports</td>
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<td>Equipment files and maintenance records</td>
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<td>Contracts and agreements</td>
<td>7 years after all obligations end</td>
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<td>Correspondence — general</td>
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<td>Insurance Records</td>
<td>Policies — occurrence type</td>
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<td>Policies — claims-made type</td>
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<td>Accident reports</td>
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<td>Claims (after settlement)</td>
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<td>Group disability records</td>
<td>7 years after end of benefits</td>
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<td>Deeds</td>
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<td>Leases (expired)</td>
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<td>Mortgages, security agreements</td>
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<td>Workers comp claims (after</td>
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<td>Employee orientation and training</td>
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<td>Employment applications</td>
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<td>Withholding tax statements</td>
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<td>Technology</td>
<td>Software licenses and support</td>
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<td>agreements</td>
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II. Electronic Documents and Records

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an “archive” computer file folder. Backup and recovery methods should be tested on a regular basis.

III. Emergency Planning

The Non-Profit’s records should be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping the Non-Profit operating in an emergency will, if possible, be duplicated or backed up at least weekly and maintained off-site.

IV. Document Destruction

Documents should be eliminated at the end of the relevant retention period. Destruction of financial and personnel-related documents should be accomplished by shredding.

Document destruction with respect to relevant documents will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation or lawsuit.

V. Compliance

The Non-Profit’s will periodically review these procedures with legal counsel or the Non-Profit’s certified public accountant to ensure that they are in compliance with new or revised regulations.

Adopted \[25\text{th} \text{of July, 2015}\]

Faitci Jea[1][2] Hebert, Clerk,
Medicinal Alternatives, Inc.
Appendix 4

MEDICINAL ALTERNATIVES, INC.
COMPENSATION SETTING POLICY

I. Introduction

This policy codifies the procedures by which the board of directors of Medicinal Alternatives, Inc. (the “Non-Profit”) sets the compensation of directors, top management officials, officers and key employees (“Executive Compensation”). These procedures are designed to comply with the “safe harbor” requirements set forth in the tax regulations on intermediate sanctions to create a rebuttable presumption of reasonableness in compensation levels.

II. Policy

The board of directors shall oversee the setting of Executive Compensation and shall (1) determine compensation of all directors, top management officials, officers and key employees, and (2) review, assess and approve the reasonableness of such compensation on a regular basis. In order to be approved as reasonable, compensation must be an amount that would ordinarily be paid for comparable work by similarly situated organizations under like circumstances. The particular education, experience and skill of the compensated individual may also be taken into account.

III. Guidelines

Compensation determinations made by the directors will be made in accordance with the following guidelines:

i. In setting and determining the reasonableness of Executive Compensation, the board shall obtain and rely upon compensation information for comparable work by similarly situated organizations under like circumstances, as defined in Section II above.

ii. Board directors involved in setting and approving Executive Compensation, as well as any third parties providing professional advice to the board of directors in connection with setting and approving Executive Compensation shall be independent and have no conflicts of interest as to the executive whose compensation is being reviewed. Board directors shall have no conflict of interest for these purposes if they (1) will not economically benefit from the compensation arrangement, (2) are not family members of a person who will economically benefit, (3) have no material financial interest affected by the compensation arrangement, and (4) are not family members of a person who has a material financial interest affected by the compensation arrangement.

iii. Timely and accurate minutes of all final actions by the board regarding the setting and approval of Executive Compensation will be recorded and held with board records. Such minutes will include (1) the terms of the approved compensation arrangement and the date approved, (2) a list of the directors present during discussion, showing those who approved the arrangement, those who rejected it and those who recused themselves due to conflicts of interest, (3) the comparability data relied upon
and how such data was obtained, and (4) the rationale for determining that the arrangement was reasonable if it exceeded the range of the comparability data.


Patci Jean Hebert, Clerk,
Medicinal Alternatives, Inc.
Appendix 5

MEDICINAL ALTERNATIVES, INC.
COMPREHENSIVE INFORMATION SECURITY POLICY

I. Objective

It is the objective of Medicinal Alternatives, Inc. (the "Non-Profit") in the development and implementation of this comprehensive information security program ("CISP") to create effective administrative, technical and physical safeguards for the protection of personal information, and to comply with obligations under 201 CMR 17.00. This CISP sets forth our procedure for evaluating our electronic and physical methods of accessing, collecting, storing, using, transmitting, and protecting personal information. For purposes of this CISP, "personal information" means an individual's first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such resident: (1) Social Security number; (2) driver's license number or state-issued identification card number; or (3) financial account number, or credit or debit card number, with or without any required security code, access code, personal identification number or password, that would permit access to an individual's financial account; provided, however, that "personal information" shall not include information that is lawfully obtained from publicly available information, or from federal, state or local government records lawfully made available to the general public. The Non-Profit generally acquires personal information in connection with hiring employees and payroll, and in connection with sales to the public.

II. Purpose

The purpose of the CISP is to:

- Ensure the security and confidentiality of personal information;

- Protect against any anticipated threats or hazards to the security or integrity of such information; and

- Protect against unauthorized access to or use of such information in a manner that creates a substantial risk of identity theft or fraud.

III. Data Security Coordinator

The Non-Profit appoints the Treasurer to be its Data Security Coordinator. The Data Security Coordinator will be responsible for:

- Initial implementation of the CISP;

- Regular testing of the CISP’s safeguards;
• Evaluating the ability of each of the Non-Profit’s third party service providers to implement and maintain appropriate security measures for the personal information to which the Non-Profit permits them access, and requiring such third party service providers to implement and maintain appropriate security measures;

• Reviewing the scope of the security measures in the CISP at least annually, or whenever there is a material change in the Non-Profit’s business practices that may implicate the security or integrity of records containing personal information; and

• Conducting an annual training session for all directors, officers, employees, volunteers and independent contractors, including temporary and contract employees who have access to personal information on the elements of the CISP.

IV. Handling Personal Information

A. Paper Records

All paper records containing personal information shall be kept in a locked file cabinet with restricted access. Paper records will be destroyed regularly in accordance with the Non-Profit’s document destruction policy using an office-grade shredder. Records containing personal information may not be taken out of the office and may be accessed only by personnel with a business necessity. Checks that need to be transported from the dispensary to the bank may be sent by US mail or hand delivered by the responsible employee, and if hand delivered, will not be left unattended at any point in the transition.

Checks. When the Non-Profit receives checks from members of the public, it will make only one hard copy and keep it in a locked file cabinet with restricted access. The checks themselves will also be kept under lock and key until they are deposited.

Paper employment records. Paper employment records must be kept under lock and key and accessed only by staff members responsible for employment issues and/or by the Chief Executive Officer.

B. Electronically Held Records

The Non-Profit requires the following security systems with respect to the maintenance of personal information on its computers:

Authentication Protocols. The Data Security Coordinator shall secure user authentication protocols including:

• Control of user IDs and other identifiers;

• A reasonably secure method of assigning and selecting passwords, or use of unique identifier technologies, such as biometrics or token devices;
• Control of data security passwords to ensure that such passwords are kept in a location and/or format that does not compromise the security of the data they protect;

• Restricting access to active users and active user accounts only; and

• Blocking access to user identification after multiple unsuccessful attempts to gain access.

**Access Protocols.** The Data Security Coordinator shall implement the following secure access control measures:

- Restrict access to records and files containing personal information to those who need such information to perform their job duties; and

- Assign unique identifications plus passwords, which are not vendor supplied default passwords, to each person with computer access that is reasonably designed to maintain the integrity of the security of the access controls.

**Restriction on E-mailing Personal Information.** The Non-Profit will not, as a general rule, send or accept personal information by e-mail. To the extent exceptions must be made, the security measures described in this CISP shall be taken.

**Encryption.** Should any records and files containing personal information be transmitted across public networks or wirelessly, such records or files shall be encrypted. Personal information stored on laptops and other portable devices shall also be encrypted.

**Monitoring.** The Non-Profit shall take all steps necessary to reasonably monitor its computer network for unauthorized use of or access to personal information.

**Firewalls.** All files containing personal information on a system that is connected to the Internet shall be protected by a reasonably up-to-date firewall protection and operating system security patches designed to maintain the integrity of the personal information.

**Virus protection.** All computers containing personal information shall be protected by reasonably up-to-date versions of system security agent software, including malware protection and reasonably up-to-date patches and virus definitions, or a version of such software that can still be supported with up-to-date patches and virus definitions, and is set to receive the most current security updates on a regular basis.

**C. Vendors**

The Non-Profit may share personal and financial information with its payroll service, its CPA firm, legal counsel, credit/debit card vendors and Pay Pal. The Non-Profit requires each of these organizations to send written evidence, signed by an authorized person, confirming that they follow a security plan that fully complies with 201 CMR 17.
V. Training

The Data Security Coordinator shall ensure that all employees, whether full-time, part-time, seasonal or temporary, and independent contractors, consultants and volunteers who have access to personal information are trained on the data security requirements provided in this CISP.

VI. Persons Separating from the Non-Profit

All employees, whether full-time, part-time, seasonal or temporary, and independent contractors, consultants and volunteers upon termination or resignation shall immediately be denied access to physical and electronic records containing personal information and will be required to return or destroy all records and files containing personal information in any form that may at the time of such termination or resignation be in their possession or control, including all such information stored on laptops, portable devices, or other media, or in files, records, notes, or papers.

VII. Security Breach and Notification

All employees, whether full-time, part-time, seasonal or temporary, and independent contractors, consultants and volunteers, shall as soon as practicable and without unreasonable delay notify the Data Security Coordinator when such person knows or has reason to know of a security breach or when the person knows or has reason to know that personal information was acquired or used by an unauthorized person or used for an unauthorized purpose.

A “security breach” is any unauthorized acquisition or unauthorized use of unencrypted data or, encrypted electronic data and the confidential process or key that is capable of compromising the security, confidentiality, or integrity of personal information that creates a substantial risk of identity theft or fraud. A good faith but unauthorized acquisition of personal information by a person or agency, or employee or agent thereof, for lawful purposes, is not a breach of security unless the personal information is used in an unauthorized manner or subject to further unauthorized disclosure.

When the Data Security Coordinator is informed of a security breach, he/she will (1) notify the individual whose information was compromised, and (2) notify the Massachusetts Attorney General and the Office of Consumer Affairs and Business Regulation.

The notice to the individual will be in writing, possibly by electronic mail, and will include the following information:

- A general description of the incident;
- Identification of the personal information that may be at risk;
- A description of the security program;
- A phone number to call for further information;
• Suggestion of extra caution, to review account statements, and to obtain a credit report; and

• Phone numbers and addresses of the Federal Trade Commission, state agencies that may be of assistance, and major consumer reporting agencies. The notice will not be provided if law enforcement personnel advise against it.

The notice to the Office of Consumer Affairs and Business Regulation and to the Attorney General will include the following:

• A detailed description of the nature and circumstances of the breach of security;

• The number of people affected as of the time of notification;

• The steps already taken relative to the incident;

• Any steps intended to be taken relative to the incident subsequent to notification; and

• Information regarding whether law enforcement is engaged investigating the incident.

Non-Retaliation. The Non-Profit will not retaliate against anyone who reports a security breach or non-compliance with CISP, or who cooperates in an investigation regarding such breach or non-compliance. Any such retaliation will result in disciplinary action by the responsible parties up to and including suspension or termination.

Documentation. The Non-Profit shall document all responsive actions taken in connection with any incident involving a security breach.

Adopted 25 Oct 2015

Patci Jean Hebert, Clerk,
Medicinal Alternatives, Inc.
Appendix 6

MEDICINAL ALTERNATIVES, INC.
ANTITRUST POLICY

It is the policy of Medicinal Alternatives, Inc. (the “Non-Profit”) to comply fully with all federal and state antitrust laws, which prohibit companies from working together to restrict competition. It is also the policy of the Non-Profit that it and its directors and officers are informed about antitrust laws and recognize possible antitrust issues or questions.

It is legal for competitors within the medical use of marijuana industry to work together, unless such work unlawfully restricts competition within the industry. Although the Non-Profit’s activities generally do not present antitrust issues, to ensure against inadvertent violations of federal and state antitrust laws, directors, except to ensure that prices are reasonable and affordable for the Non-Profit’s patients, and to prevent diversion for non-medical purposes, directors, officers and employees shall not discuss with competitors the following: increasing, decreasing, or stabilizing prices for medical marijuana or related products and services; and establishing market monopolies for products or services.

Furthermore, directors, officers, and employees shall not engage in any actions in the context of the Non-Profit’s activities which appear to be anti-competitive in purpose or inconsistent with this policy.

Any questions regarding antitrust issues and the Non-Profit’s activities shall be directed to the President, if any, and referred to counsel if deemed necessary.

Pursuant to 105 CMR 725.100(A)(2), no executive, member, director or any entity owned or controlled by such executive, member or director may directly or indirectly control more than three (3) registered marijuana dispensaries in the Commonwealth of Massachusetts.

Adopted 8/5/2015

[Signature]

Lucy Jean Hebert, Clerk,
Medicinal Alternatives, Inc.
SECTION D. EMPLOYMENT AND EDUCATION FORM

This Employment and Education form must be completed and signed by each of the following individuals: The Corporation’s Chief Executive Officer, Chief Operations Officer, Chief Financial Officer, individual/entity responsible for marijuana for medical use cultivation operations, and individual/entity responsible for the RMD security plan and security operations. Submit one Employment and Education form for each of the above individuals when submitting a Management and Operations Profile to the Department of Public Health.

Name

Michael DeCaro

Residential Address

[Address redacted]

Title (at applicant non-profit corporation)

Chief Executive Officer, Medicinal Alternatives, Inc.

Name of Applicant Non-Profit Corporation

Medicinal Alternatives, Inc.

Highest Education Attained – Institution, Degree, and Year

Becker College, Associates Degree, Business, 1978
Past 10 Years of Employment by Employer, Title and Time Period. List chronologically, beginning with most recent employment. Add more forms if space is needed for additional employment history entries.

<table>
<thead>
<tr>
<th>Employer</th>
<th>Title</th>
<th>Time Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Classic Envelope, Inc.</td>
<td>President</td>
<td>07/05/1988 - 10/8/2015</td>
</tr>
</tbody>
</table>

Signed under the pains and penalties of perjury, I agree and attest that all information included in this form is complete and accurate.

Signature of the Individual

10/13/2015

Date Signed
SECTION D. EMPLOYMENT AND EDUCATION FORM

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Name
Christopher Sands

Residential Address

Title (at applicant non-profit corporation)
Chief Operations Officer, Medicinal Alternatives

Name of Applicant Non-Profit Corporation
Medicinal Alternatives, Inc.

Highest Education Attained – Institution, Degree, and Year
Quinnipiac University, Masters Degree Health, 2002
**Past 10 Years of Employment by Employer, Title and Time Period. List chronologically, beginning with most recent employment. Add more forms if space is needed for additional employment history entries.**

<table>
<thead>
<tr>
<th>Employer</th>
<th>Title</th>
<th>Time Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medical Cannabis Consultants</td>
<td>Managing Partner</td>
<td>2014-Present</td>
</tr>
<tr>
<td>Family Doctor (previously named Wakefield Walk-In and Primary Care)</td>
<td>Physician Assistant - Urgent Care</td>
<td>2013-Present</td>
</tr>
<tr>
<td>Summit Medical Compassion Center</td>
<td>Director of Operations</td>
<td>2014-2015</td>
</tr>
<tr>
<td>Team Health (previously named South County Hospital)</td>
<td>Physician Assistant - Emergency Room</td>
<td>2011-Present</td>
</tr>
<tr>
<td>Ocean State Urgent Care of Westerly (previously named Westerly Urgent Care)</td>
<td>Physician Assistant - Urgent Care</td>
<td>2011-2014</td>
</tr>
<tr>
<td>Pawtuxet Valley Medical and Surgical</td>
<td>Physician Assistant - Urgent Care</td>
<td>2013</td>
</tr>
</tbody>
</table>

Signed under the pains and penalties of perjury, I agree and attest that all information included in this form is complete and accurate.

Signature of the Individual:  

Date Signed: 10/7/15
**Past 10 Years of Employment by Employer, Title and Time Period. List chronologically, beginning with most recent employment. Add more forms if space is needed for additional employment history entries.**

<table>
<thead>
<tr>
<th>Employer</th>
<th>Title</th>
<th>Time Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Atlantic Medical Group</td>
<td>Physician Assistant - Emergency Room</td>
<td>2003-2011</td>
</tr>
<tr>
<td>(previously named Westerly Hospital)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>IPC Hospitals of New England</td>
<td>Physician Assistant - Hospice, Intensive Care, Medical Floors</td>
<td>2008-2010</td>
</tr>
<tr>
<td>(previously named Hospital Internists)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stat Care/Urgent Medical Center</td>
<td>Physician Assistant - Urgent Care</td>
<td>2003-2007</td>
</tr>
<tr>
<td>(previously named Warwick Urgent Care Partners)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>University Emergency Medicine Foundation</td>
<td>Physician Assistant - Emergency Room</td>
<td>2004-2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Signed under the pains and penalties of perjury, I agree and attest that all information included in this form is complete and accurate.

[Signature of the Individual]

[Date Signed]
SECTION D. EMPLOYMENT AND EDUCATION FORM

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Name
Patricia K. DeCaro

Residential Address

Title (at applicant non-profit corporation)
Chief Financial Officer, Medicinal Alternatives, Inc.

Name of Applicant Non-Profit Corporation
Medicinal Alternatives, Inc.

Highest Education Attained – Institution, Degree, and Year
Millbury High School, High School Diploma, 1971
Past 10 Years of Employment by Employer, Title and Time Period. List chronologically, beginning with most recent employment. Add more forms if space is needed for additional employment history entries.

<table>
<thead>
<tr>
<th>Employer</th>
<th>Title</th>
<th>Time Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Classic Envelope, Inc.</td>
<td>Vice President</td>
<td>1988-2015</td>
</tr>
</tbody>
</table>

Signed under the pains and penalties of perjury, I agree and attest that all information included in this form is complete and accurate.

Signature of the Individual: [Signature]

Date Signed: 10/15/15
SECTION D. EMPLOYMENT AND EDUCATION FORM

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<table>
<thead>
<tr>
<th>Name</th>
<th>John J. Monahan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential Address</td>
<td></td>
</tr>
<tr>
<td>Title (at applicant non-profit corporation)</td>
<td>Head of Security, Medicinal Alternatives, Inc.</td>
</tr>
<tr>
<td>Name of Applicant Non-Profit Corporation</td>
<td>Medicinal Alternatives, Inc.</td>
</tr>
<tr>
<td>Highest Education Attained – Institution, Degree, and Year</td>
<td>St. John's High School, High School Diploma, 1961</td>
</tr>
</tbody>
</table>
Past 10 Years of Employment by Employer, Title and Time Period. List chronologically, beginning with most recent employment. Add more forms if space is needed for additional employment history entries.

<table>
<thead>
<tr>
<th>Employer</th>
<th>Title</th>
<th>Time Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Monahan Group, Inc.</td>
<td>Senior Advisor &amp; Treasurer</td>
<td>2005-Present</td>
</tr>
</tbody>
</table>

Signed under the pains and penalties of perjury, I agree and attest that all information included in this form is complete and accurate.

[Signature]

Signature of the Individual

[Date]

Date Signed
SECTION D. EMPLOYMENT AND EDUCATION FORM

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Name

Christopher Jardin

Residential Address

[Redacted]

Title (at applicant non-profit corporation)

Head of Cultivation, Medicinal Alternatives, Inc.

Name of Applicant Non-Profit Corporation

Medicinal Alternatives, Inc.

Highest Education Attained – Institution, Degree, and Year

Boston University, Bachelor of Science (Management Studies), 1998
Past 10 Years of Employment by Employer, Title and Time Period. List chronologically, beginning with most recent employment. Add more forms if space is needed for additional employment history entries.

<table>
<thead>
<tr>
<th>Employer</th>
<th>Title</th>
<th>Time Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Self-Employed</td>
<td>Farmer/Grower of Medical Marijuana</td>
<td>July 2008-Present</td>
</tr>
<tr>
<td>Loyaltec, LLC</td>
<td>Co-Founder/VP - Client Relations</td>
<td>May 2003 - December 2007</td>
</tr>
</tbody>
</table>

Signed under the pains and penalties of perjury, I agree and attest that all information included in this form is complete and accurate.

[Signature of the Individual]  
10/14/15  
Date Signed