March 5, 2018

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

Re: Request for Information

Dear Mr. Sheehan,

This letter is to supply the Department with the required information requested on February 15, 2018 which is necessary for the Department to complete its evaluation of the applicants Management and Operations Profile (Application 1 of 1). The following is an explanation of completed responses, clarifications, and changes required.

1. Bylaws have been updated to reflect the conflict of interest policy requirements. Enclosed is a vote of the board of directors as well as the bylaws to show the updates.

2. Complete response to Question C.12 included

3. Complete response to Question D.20 included

4. Complete response to Question E.24 included

5. Complete response to Question E.32 that is compliance with 105 CMR 725.010 included

6. Resubmitted response to Question E.35
7. Resubmitted response to Question E.35

8. Resubmitted a completed response to Question E.36 that identifies the correct section of the Regulations.

9. Resubmitted a completed response to Question E.36 that complies with the definition of Verified Financial Hardship.

10. Resubmitted a response to Question E.37 that removes the word “smoke” and inserts the words “product line”. The word “smoke” was not intended to be in the response to the question.

Additionally, The Leonard J. Irving Center has enclosed the cooperate conversion documents provided by the Secretary of State’s office so that the Department can certify them that the registrant is a registrant with the Department or the applicant has an application pending before the Department. The applicant requests that the Department, after determining eligibility of the applicant, certify the conversion documents and return them so that they can be filed with the Secretary of State. Upon completion of the conversion process, the applicant will obtain a Certificate of Good Standing that reflects its status as a domestic business and file it with the Department.

Sincerely,

Ashley L Driscoll
President/CEO
The Leonard J. Irving Center, Inc.
THE LEONARD J. IRVING CENTER, INC.

SPECIAL CONSENT MEETING OF THE BOARD OF DIRECTORS

The undersigned, being the Directors of THE LEONARD J. IRVING CENTER, INC., hereby consent to the adoption of the following vote effective as of the date set forth below, and hereby direct that this consent be filed with the records of the Corporation:

VOTED:

That this Corporation amend its By-laws by adding the following language to the end of the last sentence of ARTICLE IV, SECTION 14:

"and further, only upon an affirmative finding by such disinterested majority that the contract or transaction is fair to the Corporation."

Date: February 16, 2018

Ashley Driskell, Director

John Irving, Director

Roy Lambert, Director

Robert P. Irving
BY-LAWS

THE LEONARD J. IRVING CENTER, INC.

ARTICLE I
NAME AND LOCATION

SECTION 1. Name.

The name of this non-profit organization shall be known as:

The Leonard J. Irving Center, Inc.

SECTION 2. Location.

The Corporation shall have such offices in addition to the principal office set forth in the Articles of Organization as the Board of Directors may from time to time designate.

ARTICLE II
PURPOSE

The purposes for which the Corporation is organized are as follows:

1. To grow, process, and distribute medical cannabis.

2. To have and to exercise all rights, powers and privileges which may now, or hereafter be conferred by the laws of the Commonwealth of Massachusetts upon Corporations formed under Chapter 180 of the Massachusetts General Laws, as amended.

ARTICLE III
MEMBERS

The corporation shall have no members. Any action or vote required or permitted by law to be taken by members of the corporation shall be taken by action or vote of the same percentage of the directors.
ARTICLE IV
BOARD OF DIRECTORS

SECTION 1. Powers.

The affairs of the corporation shall be managed by the Directors, who shall serve without compensation, and who may exercise all the powers of the corporation. The Board of Directors shall have, without express or implied limitations of the generality of the foregoing, shall have the following expressed powers:

1. To contract, make investments, receive bequests, lease, purchase or acquire any real estate or other property, rights, licenses or privileges, necessary, or convenient for, the purpose of this Corporation so far as is permitted by law and at such price and consideration and generally under such terms and conditions as they think fit;

2. To borrow money on the credit of the Corporation, to incur such indebtedness on the notes of the Corporation, or otherwise, as they deem necessary, to secure any indebtedness by pledge, mortgage or other collateral;

3. To engage and appoint all Employees or Agents of the Corporation on terms they think advisable and to fix reasonable salaries of the same, and to remove same at any time by a vote of the Board of Directors;

4. To make rules and regulations for the guidance of the Officers, Employees, and Agents of the Corporation;

5. To designate, in an emergency and otherwise, what Person, Officers or Agents may sign Corporation checks in addition to, or in substitution for, any Officer or Officers empowered to do so in these Bylaws; and

6. To raise funds on behalf of the Corporation whether by securing loans or soliciting donations from private persons, Corporations or Foundations, or from any source whatsoever and by any method whatsoever.
SECTION 2. Number and Election.

The corporation shall have a Board of not less than two (2) nor more than eleven (11) Directors. The initial Directors shall be those persons named as Directors in the Articles of Organization. Thereafter, Directors shall be elected at the annual meeting by vote of a majority of Directors then in office, to hold office until the next annual meeting or until a successor is elected and qualified. The number of Directors may be changed by amendment of the by-laws.

SECTION 3. Selection and Replacement of Directors.

Any additional Director or replacement for a current Director, shall be selected and approved by a majority vote of the Board of Directors. The Board of Directors is authorized to fill vacancies or to add members to the Board up to the maximum of eleven (11) at any regular or called meeting of the Board of Directors. Continuing Directors may act despite a vacancy or vacancies on the Board and continuing Directors shall be deemed to constitute the full Board, even if this means that the total number of Directors has dropped below the required minimum of two (2). An election to fill any vacancy shall become effective upon delivery of written notice to the Clerk of the actions of the Board of Directors, signed on behalf of a majority of the members of the Board of Directors. The person elected to fill a vacancy shall serve the remainder of the unexpired term, or until his or her successor is duly elected and qualified.

SECTION 4. Removals.

Any Director may be removed from the Board of Directors of the Corporation, with or without cause, and from any office which he or she holds at any time by a two-thirds (2/3) vote of all the Directors then in office, which vacancy to be filled as provided herein.

SECTION 5. Resignations.

Any Director or other Officer, may resign at any time by delivering a written statement of resignation to Corporation at its principal office or to the Clerk.
SECTION 6. Committees.

The Directors may elect or appoint one or more committees and may delegate to any such committee or committees any or all of their powers, provided that any committee to which the powers of the Directors are delegated shall consist solely of Directors. Unless the Directors otherwise determined, committees shall conduct their affairs in the same manner as is provided in these bylaws for the Directors. The members of any committee shall remain in office at the pleasure of the Directors.

SECTION 7. Annual Meeting.

The annual meeting of Directors shall be held within six months after the end of the fiscal year of the corporation on such date and at such hour and place as the Directors or an Officer designated by the Directors shall determine. In the event that no date for the annual meeting is established or such meeting has not been held on the date so determined, a special meeting in lieu of the annual meeting may be held with all of the force and effect of an annual meeting.

SECTION 8. Regular and Special Meetings.

Regular meetings of the Directors may be held at such places and at such times as the Directors may determine. Special meetings of the Directors may be held at any time and at any place when called by the chairman of the Board of Directors, if any, the president, or a majority of the Directors.


Forty-eight hours' notice by mail, telecopier, telephone or word of mouth shall be given for an annual or special meeting unless shorter notice is adequate under the circumstances. No notice need be given for a regular meeting. Whenever notice of a meeting is required, such notice need not be given to any Director if a written waiver of notice, executed before or after the meeting, is filed with the records of the meeting, or to any Director who attends the meeting without protesting prior thereto or at its commencement the lack of notice to such Director. Neither such notice nor waiver of notice need specify the purposes of the meeting, unless otherwise required by law, the articles of organization or the by-laws.
SECTION 10. Quorum.

At any meeting of the Directors a majority of the Directors then in office shall constitute a quorum. Any meeting may be adjourned by a majority of the votes cast upon the question, whether or not a quorum is present, and the meeting may be held as adjourned without further notice.

SECTION 11. Action by Vote.

When a quorum is present at any meeting, a majority of the Directors present and voting shall decide any question, including election of Officers, unless otherwise provided by law, the articles of organization or the by-laws.

SECTION 12. Action by Writing.

Any action required or permitted to be taken at any meeting of the Directors may be taken without a meeting if all the Directors consent to the action in writing and the written consents are filed with the records of the meetings of the Directors. Such consents shall be treated for all purposes as a vote at a meeting.

SECTION 13. Presence Through Communications Equipment.

Unless otherwise provided by law or the articles of organization, Directors may participate in a meeting of the Board of Directors by means of a conference telephone or similar communications equipment by means of which all persons participating in the meeting can hear each other at the same time, and participation by such means shall constitute presence in person at a meeting.

SECTION 14. Vote of Interested Director.

A Director who is a member, stockholder, trustee, Director, Officer or employee of any firm, corporation or association with which the corporation contemplates contracting or transacting business shall disclose his or her relationship or interest to the other Directors acting upon or in reference to such contract or transaction. No Director so interested shall vote on such contract or transaction, but he or she may be counted for purpose of determining a quorum, and further, only upon an affirmative finding by such disinterested majority that the contract or transaction is fair to the Corporation.
In case the corporation enters into a contract or transacts business with any firm, corporation or association of which one or more of its Directors is a member, stockholder, trustee, Director, Officer, or employee, such contract or transaction shall not be invalidated or in any way affected by the fact that such Director or Directors have or may have interests therein which are or might be adverse to the interests of the corporation. No Director or Directors having disclosed such adverse interest shall be liable to the corporation or to any creditor of the corporation or to any other person for any loss incurred by it under or by reason of any such contract or transaction, nor shall any such Director or Directors be accountable for any gains or profits to be realized thereon.

ARTICLE V
EXECUTIVE OFFICERS

SECTION 1. Number and Qualification.

The Officers of the corporation shall be a President, Treasurer, Clerk and such other Officers, if any, as the Directors may determine. An Officer may but need not be a Director. The clerk shall be a resident of Massachusetts unless the Corporation has a resident agent duly appointed for the purpose of service of process. A person may hold more than one office at the same time.

SECTION 2. Election.

The initial Officers shall be those persons named as Officers in the Articles of Organization. Thereafter, the President, Treasurer and Secretary shall be elected annually by the Directors at the annual meeting. Other Officers, if any, may be elected by the Directors at any time.

SECTION 3. Tenure.

The President, Treasurer and Secretary shall each hold office until the next annual meeting of the Directors and until a successor is elected and qualified, and other Officers shall serve at the pleasure of the Directors.
SECTION 4. Chairman of the Board of Directors.

If a chairman of the Board of Directors is elected, he or she shall preside at all meetings of the Directors except as the Directors shall otherwise determine, and shall have such other powers and duties as may be determined by the Directors.

SECTION 5. President and Vice President.

Unless otherwise determined by the Directors, the president shall be the Chief Executive Officer of the corporation and, subject to the control of the Directors, shall have general charge and supervision of the affairs of the corporation. If no Chairman of the Board of Directors is elected, the President shall preside at all meetings of the Directors, except as the Directors otherwise determine. The President shall have such other duties and powers as the Directors shall determine. Any Vice President shall have such powers and shall perform such duties as the Board of Directors may, from time to time, designate.

SECTION 6. Treasurer.

The Treasurer shall be the Chief Financial Officer of the Corporation. He or she shall be in charge of its financial affairs, funds, securities and valuable papers and shall keep full and accurate records thereof. He or she shall have such other duties and powers as designated by the Directors or the President.

SECTION 7. Secretary.

The Secretary shall record and maintain records of all proceedings of the Directors in a book or books kept for that purpose and shall have custody of the seal of the Corporation. If the Secretary is absent from any meeting of Directors, a Temporary Secretary chosen at the meeting shall exercise the duties of the Secretary at the meeting.

SECTION 8. Other Powers and Duties.

Each Executive Officer shall, subject to these Bylaws, have, in addition to the duties and powers specifically set forth in these Bylaws, such duties and powers as are customarily incident to his/her office, and such duties and powers as the Board of Directors may, from time to time, designate.
SECTION 9. Other Officers.

Other Officers shall have such duties and powers as may be designated from time to time the Directors.

SECTION 10. Resignation.

Any Officer may resign at any time by delivering his or her resignation in writing to the chairman of the Board, if any, the president or the clerk or to the corporation at its principal office. Such resignation shall be effective upon receipt unless specified to be effective at some other time.

SECTION 11. Removal.

Any Officer may be removed, at any time, with or without cause, by the vote of a majority of the Directors then in office.

SECTION 12. Vacancies.

Any vacancy in any office may be filled by vote of a majority of the Directors then in office.

ARTICLE VI
COMPENSATION

SECTION 1. Directors and Officers.

No Director or Officer shall receive pecuniary compensation for serving as such. Directors and Officers may be reimbursed for reasonable expenses incurred in connection with the affairs of the Corporation.

SECTION 2. Employees.

Employees and other agents shall receive such compensation as the Board of Directors may determine. The Board may delegate the power to fix the salary or other compensation of any employee or agent not appointed by resolution of the Board of Directors.
ARTICLE VII
INDEMNIFICATION

The corporation shall, to the extent legally permissible, indemnify each person who may serve or who has served at any time as a trustee, Director or Officer of the corporation or of any of its subsidiaries, or who at the request of the corporation may serve or at any time has served as a trustee, Director or Officer of, or in a similar capacity with, another organization or an employee benefit plan, against all expenses and liabilities (including counsel fees, judgments, fines, excise taxes, penalties and amounts payable in settlements) reasonably incurred by or imposed upon such person in connection with any threatened, pending or completed action, suit or other proceeding, whether civil, criminal, administrative or investigative, in which such person may become involved by reason of serving or having served in such capacity (other than a proceeding voluntarily initiated by such person unless he or she is successful on the merits, the proceeding was authorized by the corporation, or the proceeding seeks a declaratory judgment regarding his or her own conduct); 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 his or her action was in the best interests of the corporation or, to the extent such matter relates to service with respect to any employee benefit plan, in the best interests of the participants or beneficiaries of such employee benefit plan; and provided, further, that as to any matter disposed of by a compromise payment by such person, pursuant to a consent decree or otherwise, the payment and indemnification thereof have been approved by the corporation, which approval shall not unreasonably be withheld, or by a court of competent jurisdiction. Such indemnification shall include payment by the corporation of expenses incurred in defending a civil or criminal action or proceeding in advance of the final disposition of such action or proceeding, upon receipt of an undertaking by the person indemnified to repay such payment if he or she shall be adjudicated to be not entitled to indemnification under this section, which undertaking may be accepted without regard to the financial ability of such person to make repayment.

A person entitled to indemnification herunder whose duties include service or responsibilities as a fiduciary with respect to a subsidiary or other organization shall be deemed to have acted in good faith in the reasonable belief that his
or her action was in the best interests of the corporation if such person acted in good faith in the reasonable belief that his or her action was in the best interests of such subsidiary or organization or of the participants or beneficiaries of, or other persons with interests in, such subsidiary or organization to whom he or she had a fiduciary duty.

Where indemnification hereunder requires authorization or approval by the corporation, such authorization or approval shall be conclusively deemed to have been obtained, and in any case where a Director of the corporation approves the payment of indemnification, such Director shall be wholly protected, if:

(i) the payment has been approved or ratified (1) by a majority vote of a quorum of the Directors consisting of persons who are not at that time parties to the proceeding, or (2) by a majority vote of a committee of one or more Directors who are not at that time parties to the proceeding and are selected for this purpose by the full Board (in which selection Directors who are parties may participate); or

(ii) the action is taken in reliance upon the opinion of independent legal counsel (who may be counsel to the corporation) appointed for the purpose by vote of the Directors or in the manner specified in clauses (1) or (2) of subparagraph (i); or

(iii) the payment is approved by a court of competent jurisdiction; or

(iv) the Directors have otherwise acted in accordance with the applicable legal standard of conduct.

Any indemnification or advance of expenses under this section shall be paid promptly, and in any event within thirty days, after the receipt by the corporation of a written request therefor from the person to be indemnified, unless with respect to a claim for indemnification the corporation shall have determined that the person is not entitled to indemnification. If the corporation denies the request or if payment is not made within such thirty-day period, the person seeking to be indemnified may at any time thereafter seek to enforce his or her rights hereunder in a court of competent jurisdiction and, if successful in whole or in part, he or she shall be entitled
also to indemnification for the expenses of prosecuting such action. Unless otherwise provided by law, the burden of proving that the person is not entitled to indemnification shall be on the corporation.

The right of indemnification under this section shall be a contract right inuring to the benefit of the Directors, Officers and other persons entitled to be indemnified hereunder and no amendment or repeal of this section shall adversely affect any right of such Director, Officer or other person existing at the time of such amendment or repeal.

The indemnification provided hereunder shall inure to the benefit of the heirs, executors and administrators of a Director, Officer or other person entitled to indemnification hereunder. The indemnification provided hereunder may, to the extent authorized by the corporation, apply to the trustees, Directors, Officers and other persons associated with constituent corporations that have been merged into or consolidated with the corporation who would have been entitled to indemnification hereunder had they served in such capacity with or at the request of the corporation.

The right of indemnification under this section shall be in addition to and not exclusive of all other rights to which such Director, Officer or other persons may be entitled. Nothing contained in this section shall affect any rights to indemnification to which corporation employees or agents, other than Directors, Officers and other persons entitled to indemnification hereunder, may be entitled by contract or otherwise by law.

ARTICLE VIII
SEAL AND FISCAL YEAR

SECTION 1. Seal.

The Corporation shall have a seal in such form to be decided, from time to time, by the Board of Directors.

SECTION 2. Fiscal Year.

The fiscal year of the Corporation shall coincide with the calendar year.
ARTICLE IX
MISCELLANEOUS PROVISIONS

SECTION 1. Execution of Instruments.

Unless otherwise determined by the Board of Directors, all deeds, leases, contracts, assignments, instruments of transfer, proxies, and other instruments, whether or not under seal, and all checks, acceptances, promissory notes, bills of exchange and other orders for the payment of money, shall be signed by the Treasurer or by the President.

SECTION 2. Governing Law.

All matters not specifically mentioned herein shall be governed and controlled by applicable laws of The Commonwealth of Massachusetts.

SECTION 3. Amendments.

These Bylaws may be amended by a majority vote of the Directors present and qualified to vote at any meeting of the Directors, provided that written notice of the time and place of such meeting, and the substance of the proposed amendment, shall be mailed to each Director at their last known address at least seven (7) days in advance of such meeting.

Dated: October ____, 2017
SECTION C. NON-PROFIT COMPLIANCE

If the applicant is a non-profit corporation, answer each of the questions in Section C 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 Section.

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.

No management company is being utilized by the applicant at this time.

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.

Automated Finishing Co. Inc. is an entity committed to contributing 5% or more of initial capital to operate the proposed RMD. The applicant is in the process of converting the corporation from a non-profit corporation to a domestic business corporation. There are no other Related Party Transactions 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: [Initials].
20. Describe the experience, and length of experience, of the applicant'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.

James Michael Figara will be the acting Security Director for The Leonard J Irving Center. James has no professional security experience in providing services for marijuana for medical purposes.

However, James served in the Rhode Island Army National Guard for 6 years as a staff sergeant. During his service James had a top secret clearance and was a weapons expert for chemical, biological and radiological weapons.

Mr. Figara also was responsible for physical security for all four facilities at Pierce Chevrolet, Buick and Truck Centers.

James was employed for 10 years at the Bristol County Sheriff's Office as a Sargent in the Law Enforcement Division and worked for an additional 20 years as a certified firearms instructor for MA Criminal justice Training Council.

With his vast array of knowledge as to how security systems and physical security protocols operate, James will be an eminent part of The Leonard J Irving Centers security. James will have an explicit understanding of the rules and regulations set forth by the state of Massachusetts for registered medical marijuana facilities. The required training for individuals in specified job roles will go through an extensive training in order to understand the rules and regulations set forth by the state of Massachusetts.

John Irving, the acting COO/Director of Cultivation does not have any experience with marijuana for medical use cultivation operations. However, he has vast experience with agricultural cultivations operations that he has gained over the last five years owning and operating one of the largest indoor agriculture companies in New England, 2 Friends Farm Inc., a certified organic microgreen producer which operates year round.
33. Provide a summary of the applicant’s operating procedures for record keeping.

As per 105 CMR 725.105 (1) a record-keeping program such as Quick Books will be implemented. This added record-keeping program will aid the business with billing for the facility such as rent, electric, gas, phone, Internet, insurance and any other bills due for the physical facility. The record-keeping program will also contain expenditures and receipts for end of quarter and tax information. An accountant will be hired to reconcile the company's books monthly or deemed necessary to catch any mistakes. These reports from the accountant will also be kept on file for easy access to the DPH as requested. The same accountant/tax attorney will file business reports and taxes as needed to the Federal or State Government. The tracking system can also balance out the cash drawers for each employee at the end of each working shift, or an additional system will be established by the accountant and Operations Manager. Each employee will be trained on the accounting procedures to minimize errors.

The Leonard J. Irving Center will work with a payroll company to correctly compile hours worked and submit payroll taxes. The payroll company will also keep track of benefits, vacation time, if the company desires. The payroll taxes will automatically be paid out to the state agencies as required by law. Payroll services include a Human Resource portal that provide Employee Handbooks, W-4's, I-9's and other documents necessary to operate a successful business.
As mandated by the rules and regulations set forth by the state of Massachusetts, 105 CMR 725.105 (K), a RMD shall provide educational materials regarding marijuana to registered qualifying patients and their personal caregivers. The Leonard J Irving Center will have a designated educational center that will allow patient access to materials such as print materials, videos and I-pads with programmed materials regarding products in the dispensary and how each product can benefit an array of ailments. Not only will the patient/caregiver be able to research the benefits of cannabis, but warnings as required by the DPH will be listed and any other requirements. These materials will be kept up to date as to stay in front of the ever-changing market of cannabis and its benefits. The educational center will also give free classes to any patient that is looking for continued education. Such materials shall be made available for inspection by the Department upon request. The RMD shall make available qualified registered agents in order to answer any questions in regards to cannabis and the discussed ailment.
36. Provide a summary of the applicant'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.

105 CMR 725.100(A)(6) states an RMD must have a program to provide reduced cost or free marijuana to patients with documented verified financial hardship. The applicant will provide medical marijuana without charge or at less than the market price to registered qualifying patients with verified financial hardships. Pursuant to 105 CMR 725.004, to qualify the individual must be a recipient of MassHealth, or Supplemental Security Income, or the individual's income does not exceed 300% of the federal poverty level, adjusted for family size.

Patients who demonstrate verified financial hardship will fill out an application and be marked in the RMD's patient database as eligible for reduced cost or free medical marijuana. The application will be used to determine the degree of discount for qualified patients. It is the applicant's intention in most cases to have the discounted product sold at cost. In cases of exceptional need, marijuana for medical use will be provided without charge. All dispensary agents will be trained to provide the discounts in accordance with the applicant's policies and procedures.

37. Provide a summary of the training(s) that the applicant intends to provide to Dispensary Agents.

The Leonard J Irving Center will require that all dispensary agents complete training prior to performing job functions. The training will be tailored to the roles and responsibilities of the job function of each agent, and at a minimum must include training on confidentiality, and other topics as specified by the DPH and its updates. The Leonard J Irving Center will use Medical Marijuana 411's website educational learning portal to perform ongoing education to employees. Most employees will receive a much more intensive training for the job duties hired for. Medical Cannabis is an ever-changing market with new strains and products that patients must be educated on. The staff will receive the required minimum of 8 hours of on-going training. The training, depending on the agent's position, will include, but not limited to, Privacy and Confidentiality requirements, Overview of the Act for Humanitarian Use of Medical Marijuana and its enabling legislation 105 CMR 725.000. Some other education that will be available will be policies directed to proper identification of patients and caregivers, product line, emergency protocols and incident management, waste disposal, product handling and sanitation, product testing, whistle-blowing and sexual harassment. Each employee will be issued an Employee Handbook and have easy access to the companies Standard Operating Procedures and Safety Manual. Agents will sign a statement indicating date, time and place of the trainings.