

COPY

EXHIBIT 4

RECEIVED

JAN - 2 RECD

ADDENDUM TO SPECIAL PERMIT APPLICATION
RESINATE INC.
135 WESTBOROUGH ROAD, GRAFTON, MA

PLANNING BOARD
GRAFTON, MA

SPECIAL PERMIT FINDINGS OF FACT

- I. Social, economic, or community needs that are served by the proposal:
 - a. The Town of Grafton has determined that the establishment of Licensed Marijuana retail outlet would be in the best interest of its residents.
 - b. Resinate will offer adult marijuana retail options at its location on Westborough Road.
 - c. Resinate will allow qualified consumers in the Commonwealth to have access to consistent, high-quality marijuana and marijuana products that are regulated and tested for cannabinoid content and contaminants.
 - d. Resinate will hire over 10 full and part time employees from the Town and/or surrounding communities to support and distribution operations.

- II. Traffic flow and safety, including access, parking and loading areas:
 - a. Conveniently located on Route 30 near the interchange of Westborough Road and Centech Boulevard.
 - b. A Traffic Impact Statement has been prepared and is included in this narrative and is included.
 - c. All parking is on site. 54 parking spaces plus areas for loading have been provided.

- III. Adequacy of utilities and other public services:
 - a. The building existed as a Retail and Light Industrial operation. Resinate is renovating the building in accordance with regulations governing the sale of marijuana.
 - b. It is serviced by municipal water and will soon be serviced by municipal sewer. Installation to the municipal sewer system will be completed once the sewer line being installed along Westborough Road is complete.

- IV. Neighborhood character and social structure:
 - a. Resinate is located in a Office/Light Industrial zone along Millbury Street located next to a multi-tenant residential building and a commercial building serving a pet care business with residential tenancy flanking the property.
 - b. Its operation will have a negligible impact on the surrounding neighborhood.

- V. Impacts on the natural environment:
 - a. The proposed use will not alter the site or increase impervious area. Parking and drainage are both existing.

- VI. Potential fiscal impact, including town services needed, tax base, and employment.
- a. Resinate will hire over 10 full and part time employees from the Town to support retail and distribution operations.
 - b. A Host Community Agreement provides Grafton with additional financial benefits beyond local property taxes to support any programs, services, or organizations.
 - c. Resinate will not create any additional demand on town services.

SUPPLEMENTARY SPECIAL PERMIT FINDINGS OF FACT

- I. The Marijuana Establishment does not derogate from the purposes and intent of this Section and the Zoning Ordinance:

The purpose of the Marijuana ordinance is to provide for adult use marijuana establishments in the Town of Grafton and to minimize any adverse impacts these establishments may have on adjacent properties and to provide standards for the placement, design, siting, safety, security, monitoring, modification and discontinuance of adult use marijuana establishments subject to reasonable conditions that will protect the public health, safety and welfare.

Resinate's location, building layout, siting, safety, security, odor control and monitoring are collectively designed to protect the public health, safety and welfare of the public.

- II. The application information submitted is adequate to consider approving the special permit request:

- a. The applicant has submitted all of the required documents listed in the Zoning Ordinance including the required Requests for Waivers.
- b. Distances from parks, schools, daycares and other similar retail outlets
 1. Parks - There are no Parks within 1 mile of the site
 2. Schools - No schools are located within 1 mile of the site
 3. Daycare - No Daycares are located within 1 mile of the site
 4. Marijuana Retail Outlet - There are no marijuana retail establishments within 500 feet of the site
 5. Public Library – There are no libraries within 500 feet of the site.

- III. The proposed establishment is designed to minimize any adverse impacts on abutting properties.

- a. On the west side, there is a multi-tenant residential building.

- b. On the east side, there is a commercial/residential building providing pet care services and apartment rental.
 - c. The abutters are located at 131 and 1377 Westboro Road.
 - d. All parking is on-site with no street parking available.
- IV. The security plan provides sufficient assurance that adequate security controls have been implemented to ensure the protection of the public health and safety during hours of operation and that any marijuana or marijuana related products are adequately secured on-site or via delivery.

Project Narrative and Management Plan

- A. Resinate, Inc. is a Massachusetts for-profit Corporation incorporated on April 20, 2018. Resinate is a vertically integrated Cannabis Company.

The 135 Westborough Road site has recently been purchased by JKRP Holdings, LLC which is owned and operated by Resinate CEO, Peter DeCaro. The site is 1.08 Acres in size. The facility has approximately 10,000 square feet of space to which approximately 7,000 sqf is currently occupied. Tenants include:

- i. Pecorino's Wine and Cheese – approx. 1,000 sqf
 - ii. Wicked Twisted Pretzel – approx. 3,000 sqf
 - iii. Resinate, Inc. – approx. 3,000 sqf
 - iv. Available Retail Unoccupied Space – 3,000 sqf
- B. Proof of application submission and status with the CCC has been provided.
- C. Resinate currently has a Provisional Certificate of Registration (PCR) which includes Priority Status from the Cannabis Control Commission. Resinate's Marijuana Cultivation site in Douglas as well as the Medical Marijuana Retail site in Worcester has passed all inspections and is awaiting final approval which should take place at the next Public Meeting in January of 2020.

Pertaining to the site located at 135 Westborough Road in Grafton, Resinate is seeking approval of our Special Permit which would allow us to open an Adult Use Marijuana Retail Storefront. Our full application for the Grafton site has been submitted to the CCC and accepted.

Resinate has been approved to open an Adult Use Marijuana Retail Establishment by the Board of Selectman in Grafton and awarded a Host Community Agreement.

Regarding the site improvements, currently we are planning to do the following:

- 1. South (frontage) exterior
 - a. Replace Anzio's sign with Resinate signage
 - b. Repair retaining wall and reduce footprint
- 2. West exterior (Pecorino)
 - a. Repair back deck

3. North exterior
 - a. Repair back stairwell
 - b. Repair gutters
4. Parking Lot
 - a. Re-stripe lot to allow for 54 parking spots to meet zoning requirements
 - b. Identify a Reserve Parking Area for future expansion
5. Sewer
 - a. Connect with incoming town sewer system

Regarding interior improvements, we are currently:

1. Demolishing the previous Anzio's site.
2. Removing outdated equipment
3. Removing outdated wiring
4. Removing unused mechanical, plumbing equipment

We will not change the structural integrity of the site.

Improvements to the site will include:

- Updated electrical systems
- Updated plumbing and mechanical systems
- Installation of a new Fire Suppression and Sprinkler System

Anticipated hours of operation for retail sales are as follows:

- Mon-Sun: 10 am – 10 pm

We expect to employ up to 10-15 employees at the site.

General Security Overview

Resinate, Inc. ("Resinate") will implement policies and procedures to maintain a secure facility and to prevent diversion or other loss of marijuana products in accordance with 935 CMR 500.110 as set out by the Commission. These policies are intended to protect the general public, employees, and consumers.

- a. Resinate will identify each individual seeking entrance into the marijuana establishment to ensure that only individuals who are 21 years or older are allowed access.
- b. These policies will also provide for the proper storage and disposal of marijuana products. Resinate will ensure that all excess marijuana is disposed of safely and will have in place the necessary storage areas and equipment for proper storage of marijuana, including established limited access areas
- c. This equipment will include but is not limited to locked safes or vaults, keys, alarms, and cameras.
- d. In addition to these measures, Resinate will ensure that all marijuana products are kept out of plain sight of public places outside of the marijuana establishment.
- e. Resinate will also implement policies and procedures for situations following inadvertent diversion or loss of marijuana products.

- f. Resinate also will work cooperatively with law enforcement authorities and fire services and will share Resinate' security plans, policies, and procedures with those authorities.

Limited Access Areas

- a. Resinate will designate limited access areas by posting clearly visible signs, no smaller than 12" x 12" and which state: "Do Not Enter-Limited Access Area-Access Limited to Authorized Personnel Only" in lettering no smaller than one inch in height.
- b. Resinate will limit individuals allowed access to these areas to employees, agents, law enforcement, and others authorized by the Commission.
- c. Resinate will require all employees to wear employee identification badges at all times while inside the marijuana establishment.
- d. Employees of Resinate will escort all visitors, including vendors and contractors, into limited access areas. These visitors will be logged in and out, and Resinate will maintain this log and make it available to the Commission for periodic inspection. Resinate will ensure that all visitor identification badges are collected before visitors leave the premises.

Security and Alarm Requirements

- a. Resinate will implement alarms and other security equipment to prevent and detect potential loss and diversion of marijuana. This equipment will include perimeter alarms at all entrances and exits of Resinate' facility, a failure notification system, a panic alarm connected to local law enforcement, video cameras in all areas that contain marijuana, and 24-hour recordings of all video surveillance to be made available to the Commission upon request.
- b. Resinate will ensure that all video footage has a clear date and time stamp, clear still photos can be produced in color, and that the footage can be exported into standard image formats including .jpg, .gif, and .bmp formats.
- c. Resinate will store the video footage in a way that precludes loss or alteration of the footage.
- d. In addition to the primary alarm systems, Resinate will maintain a backup alarm system provided by a different company from the primary system.
- e. Resinate will have this security equipment inspected monthly.
- f. Access to all surveillance areas will be limited to employees who are essential to Resinate' security operations, including local law enforcement.

Incident Reporting

- a. Resinate will immediately notify law enforcement authorities of any security breach including, but not limited to, discovery of discrepancies identified during inventory, diversion or loss of marijuana products, any loss or unauthorized alteration of records related to marijuana, suspicious actions within the marijuana establishment, failure of an alarm system, activation of an alarm system, or any criminal acts.

- b. Resinate will provide written notice to the Commission within ten (10) calendar days of any incident that occurs on the premises.
- c. Resinate will maintain records and documentation of any security incident for at least one year.

Prevention of Diversion

Resinate, Inc. 's ("Resinate") operating policies and procedures ensure prevention of diversion, theft, and illegal or unauthorized conduct pursuant to the Commission's Adult Use of Marijuana regulations codified in 935 CMR 500. Considerations regarding diversion prevention measures include, but are not limited to, marijuana establishment agent and consumer accountability, and identifying, recording, and reporting diversion, theft, or loss. Marijuana in the process of transport, analysis, or retail sale is to be stored and tracked in a manner that prevents diversion, theft, or loss.

More specifically, diversion measures include policies and procedures requiring that:

- a. Identification is verified on the premises to ensure that only individuals 21 years or older are permitted in Resinate's adult-use marijuana establishment.
- b. Providing samples or giving away marijuana to consumers is prohibited.
- c. Employees are made aware of crime prevention techniques pursuant to 935 CMR 500.105(1)(b).
- d. Any marijuana establishment agent who has diverted marijuana is immediately dismissed, and this is reported to law enforcement and to the Commission pursuant to 935 CMR 500.105(1)(l).
- e. All employees involved in the handling and sale of marijuana for adult use complete a responsible vendor training program with a curriculum covering diversion prevention and prevention of sales to minors and comply with all other marijuana establishment agent training requirements under 935 CMR 500.105(2).
- f. Display samples of each product offered for sale are displayed in secure, locked cases, subject to the requirements of 935 CMR 500.110.
- g. Resinate only engages in reasonable marketing, advertising, and branding practices that do not promote the diversion of marijuana and comply with all other marketing and advertising requirements under 935 CMR 500.105(4).
- h. Warning statements required by the Commission's regulations are affixed to all applicable products, and that Resinate's labels comply with all other labeling of marijuana and marijuana products requirements under 935 CMR 500.105(5).
- i. Tamper or child-resistant packaging is used for applicable marijuana products, and that Resinate's products comply with all other packaging of marijuana and marijuana products requirements under 935 CMR 500.105(6).
- j. Resinate maintain real-time inventory, and tracking and tagging all marijuana products, using a seed-to-sale methodology in a form and manner to be approved by the Commission.
- k. Records are kept for inventory, seed-to-sale tracking for all marijuana products, personnel (including documentation of the completion of required training), and

waste disposal, and that Resinate comply with all other record keeping requirements under 935 CMR 500.105(9).

- l. Marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, is stored in a separate area, until such products are destroyed; and that Resinate comply with all other storage requirements under 935 CMR 500.105(11).
- m. Two or more marijuana establishment agents witness and document how the marijuana waste is disposed or otherwise handled, and that Resinate comply with all other waste disposal requirements under 935 CMR 500.105(12).
- n. All transported marijuana products that are accepted by the Marijuana Retail facility are linked to the seed-to-sale tracking program, that all vehicles transporting marijuana to the Marijuana Retail facility are staffed with a minimum of two marijuana establishment agents, and that any vehicle accidents, diversions, or other reportable incidents that occur during transport are reported to the Commission and law enforcement within 24 hours, and that Resinate only accept transported marijuana product shipments that comply with all other transportation requirements under 935 CMR 500.105(13).

Storage of Marijuana and Odor Control

Resinate, Inc. ("Resinate") will ensure that all marijuana and marijuana products are stored in compliance with 935 CMR 500.105(11). Specifically, Resinate will ensure the following:

- a. The facility will have adequate lighting, ventilation, temperature, humidity, space, and equipment, in accordance with applicable provisions of 935 CMR 500.105 and 500.110;
- b. The facility will have separate areas for storage of marijuana that is outdated, damaged, deteriorated, mislabeled, or contaminated, or whose containers or packaging have been opened or breached, until such products are destroyed, in accordance with applicable provision of 935 CMR 500.105(12);
- c. All storage areas will be maintained in a clean and orderly condition;
- d. All storage areas will be free from infestation by insects, rodents, birds, and pests of any kind; and
- e. All storage areas will be maintained in accordance with the security requirements of 935 CMR 500.110.
- f. The facility is equipped with air handling equipment that will filter the air for odor. Over 90% of all goods sold will be pre-packaged to prevent a robust odor in the store.

Per the requirements of 935 CMR 500.110, all finished marijuana products will be stored in a secure, locked safe or vault in such a manner as to prevent diversion, theft, odor, and loss. Furthermore, all safes, vaults, and any other equipment or areas used for the storage of marijuana products will be securely locked and protected from entry, except for the actual time required to remove or replace marijuana.

The storage of finished products will be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of finished products or

their containers, per the requirements of 935 CMR 500.105(3)(b)(15). In accordance with 935 CMR 500.105(3)(c), Resinate will comply with sanitary requirements. All edible products will be prepared, handled and stored in compliance with the sanitation requirements in 105 CMR 590.000: *Minimum Sanitation Standards for Food Establishments*.

Inventory Procedures

Resinate, Inc. ("Resinate") will maintain real-time inventory in compliance with 935 CMR 500.105(8), including maintaining inventory of marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal. All marijuana plants and marijuana products will be tagged and tracked within Resinate's seed-to-sale tracking system.

Resinate utilizes a real-time seed-to-sale tracking system, ERP SAP system, which will provide the electronic tracking of individual marijuana plants, including during final sale. Resinate's tracking system will utilize unique batch identification numbers to accurately track inventory.

Resinate will:

- Establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of finished and stored marijuana products;
- Conduct a monthly inventory of finished and stored marijuana;
- Conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and
- Promptly transcribe inventories if taken by use of an oral recording device.

The record of each inventory will include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory. All inventory records will be kept in accordance with Resinate's record keeping procedures. Resinate's agents will document and Resinate will report any unusual discrepancy in weight or inventory to the Commission and law enforcement authorities not more than 24 hours after the discovery of such a discrepancy.

Resinate will only sell and market inventory that is capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

Transportation and Delivery

Resinate will receive all goods for sale on the North side of the building. Goods will shipped to Resinate using UPS, Fed Ex, and a ¼ Ton Van owned by Resinate.

Deliveries will be scheduled at miscellaneous hours of the day in order to prevent tracking and diversion.

All deliveries containing Cannabis deliveries will be tracked via GPS by the Resinate security office.

Training

As required by 935 CMR 500.105(2), and prior to performing job functions, each of Resinate's agents will successfully complete a comprehensive training program that is tailored to the roles

and responsibilities of the agent's job function. Agent training will at least include the Responsible Vendor Program and eight (8) hours of on-going training annually.

On or after January 1, 2020, Resinate managers, and/or employees will have attended and successfully completed a Responsible Vendor Program operated by an education provider accredited by the Commission to provide the annual minimum of two hours of responsible vendor training to marijuana establishment agents. Resinate new, non-administrative employees will complete the Responsible Vendor Program within 90 days of the date they are hired. Resinate managers and employees will then successfully complete the program once every year thereafter.

Resinate will also encourage administrative employees who do not handle or sell marijuana to take the responsible vendor program on a voluntary basis to help ensure compliance. Resinate's records of responsible vendor training program compliance will be maintained for at least four (4) years and made available during normal business hours for inspection by the Commission and any other state licensing authority upon request.

As part of the Responsible Vendor program, Resinate's agents will receive training on a variety of topics relevant to marijuana establishment operations, including but not limited to the following:

1. Marijuana's effect on the human body, including physical effects based on different types of marijuana products and methods of administration, and recognizing the visible signs of impairment;
2. Best practices for diversion prevention and prevention of sales to minors;
3. Compliance with tracking requirements;
4. Acceptable forms of identification, including verification of valid photo identification and medical marijuana registration and confiscation of fraudulent identifications;
5. Such other areas of training determined by the Commission to be included; and
6. Other significant state laws and rules affecting operators, such as:
 - Local and state licensing and enforcement;
 - Incident and notification requirements;
 - Administrative and criminal liability and license sanctions and court sanctions;
 - Waste disposal and health and safety standards;
 - Patrons prohibited from bringing marijuana onto licensed premises;
 - Permitted hours of sale and conduct of establishment;
 - Permitting inspections by state and local licensing and enforcement authorities;
 - Licensee responsibilities for activities occurring within licensed premises;
 - Maintenance of records and privacy issues; and
 - Prohibited purchases and practices.

STATEMENT

In accordance with Section 5.10.3.b. (4) of the Special Permit application requirements set forth by the Planning Board, I hereby swear that the under the pains and penalties of perjury that all funds invested in Resinate were lawfully obtained. In accordance with the application requirements, the Shareholders and Officers are included below.

12/26/19
Date

Peter DeCaro
Peter DeCaro, CEO, Resinate, Inc.

Board of Directors of Resinate:

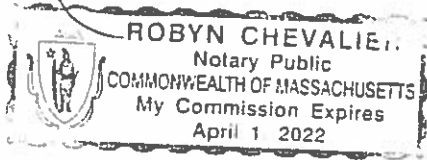
- Executive Chairman James Ross, 6 Chatham Trace, Wilbraham, MA 01095
- CEO Peter DeCaro, 2 Taft Circle, Millbury, MA 01527
- Board Member Lisa Kirby Gibbs, 46 Westwood Drive, Worcester, MA 01609
- Board Member Mark Cutting, 40 Briarwood Drive, Holyoke, MA 01040
- Board Member Rocco Falcone, 195 Twin Hills Drive, Longmeadow, MA 01106

Officer

- CFO Diane Frydrych, 7 Chartwell Circle, Shrewsbury, MA 01545

A complete list of Shareholders is attached.

Robyn Chevalier Date 12-26-19



Resinate Shareholders

Stockholder	Managing Director/Name	Address	City	State	Zip	Phone	Phone Type	Email
Polman Investments, LLC	David Goodman	89 Guion Street	Springfield	MA	01104	(413) 530-9912	Mobile	dgoodman@northstarpp.com
Michael and Patricia DeCaro	Michael DeCaro	4949 N Highway A1A	Fort Pierce	FL	34949	(508) 887-5719	Mobile	mdecaro@gilboaproperties.com
	Patricia DeCaro	4949 N Highway A1A	Fort Pierce	FL	34949	(508) 887-5718	Mobile	pdecaro@gilboaproperties.com
Zane L. Mirkin Family Trust	Zane Mirkin	153 Jupiter Key Road	Jupiter	FL	33477	(413) 886-8363	Work	zanezm@comcast.net
MM Interests LLC	Mike Mahoney	10 North Main Street, PH1	West Hartford	CT	06107	(860) 983-3563	Mobile	mike@rlmco.com
Brochu Chase Family LLC	Michael Chase	16 Spring Lane	Farmington	CT	06032	(860) 697-7442	Work	chase.michaelj@gmail.com
YWC, LLC	Peter Herman	306 Main Street	Worcester	MA	01608	(508) 277-8218	Mobile	phh@maagency.com
Everard, LLC	Michael Goss	89 Fallview Drive	Glastonbury	CT	06033	(860) 697-7411	Work	Oakwood05@gmail.com
Mass Flower Power, LLC	Peter Gibbs	46 Westwood Drive	Worcester	MA	01609	(508) 612-8534	Mobile	peter@yourworkcentral.com
Corey Cutler	Corey Cutler	33 Maple Avenue	West Orange	NJ	07052	(973) 493-1981	Mobile	ccutler@gmail.com
Peter DeCaro	Peter DeCaro	2 Taft Circle	Millbury	MA	01527	(508) 864-8150	Mobile	pdecaro@resinate.com
Kim Henwood	Kim Henwood	29 Monument Drive	Oxford	MA	01540	(508) 353-5349	Mobile	kimhenwood1@outlook.com
SpringfieldIG LLC c/o Hanmerross	James Ross	317 Meadow Street, Suite 1	Chicopee	MA	01103	(413) 364-5729	Mobile	jross@hollenbach.co
Total								

Statement

In accordance with Section 5.10.3.b. (3) of the Special Permit application requirements set forth by the Planning Board, I hereby swear that the under the pains and penalties of perjury that Resinate has executed a lease with JKRP Holdings, LLC for the purpose of operating an Adult Use Marijuana Retail Establishment.

12/26/19
Date

Peter DeCaro
Peter DeCaro, Managing Director, JKRP Holdings, LLC

Robyn Chevalier

Date 12-26-19

