

THEORY WELLNESS, INC.
MC281928

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Theory Wellness, Inc.
237 Bow Wow Road, Sheffield, MA 01257

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

Cultivation, Tier 6 / Outdoor (40,001 to 50,000 sq. ft.)

3. The licensee is a licensee or applicant for other Marijuana Establishment or Medical Marijuana Treatment Center (“MTC”) license(s):

Cultivation – Tier 1 / Indoor (up to 5,000 sq. ft) (Final License for Bridgewater)
Product Manufacturing (Final License for Bridgewater)
Retail (Final License for Great Barrington)
Retail (Provisional License for Chicopee)
MTC (Commenced operations for the dispensary in Bridgewater)
MTC (Commenced operations for the dispensary in Great Barrington)

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license types on April 4, 2019.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensee or the individuals and entities previously disclosed since the issuance of the provisional license(s).



INSPECTION OVERVIEW

8. The initial inspection took place at the facility on May 16, 2019.
9. The licensee's Marijuana Establishment(s) were inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment(s) were not in compliance with all applicable state and local codes, bylaws, laws, ordinances, and regulations.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

- b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.

- c. Cultivation Operation

Enforcement staff verified that all cultivation operations were in compliance with the Commission's regulations. Some of the requirements verified include the following:

- i. Seed-to-sale tracking;
- ii. Compliance with applicable pesticide laws and regulations; and
- iii. Best practices to limit contamination.

No canopy grid was calculated as there were no plants at the time of inspection. The licensee confirmed that it will operate within its approved tier. The canopy will be confirmed prior to commencing operations.



d. Transportation

The licensee will not be performing transportation operations from this location.

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

1. The licensee may cultivate, harvest, possess, and otherwise acquire marijuana, but shall not sell, or otherwise transport marijuana to other Marijuana Establishments, until upon inspection, receiving permission from the Commission to commence full operations;
2. The licensee is subject to inspection to ascertain compliance with Commission regulations;
3. The licensee remains suitable for licensure;
4. The licensee shall cooperate with and provide information to Commission staff; and
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105 (1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.

