

## NS AJO HOLDINGS, LLC RMDA3535

### **BACKGROUND & APPLICATION REVIEW**

1. Name and location of the proposed Medical Marijuana Treatment Center:

NS AJO Holdings, Inc.

Cultivation: 20 Authority Drive, Fitchburg, MA 01420

Product Manufacturing: 20 Authority Drive, Fitchburg, MA 01420

Dispensary: 20 Authority Drive, Fitchburg, MA 01420

2. The applicant is a licensee or applicant for other Marijuana Establishment and/or Medical Marijuana Treatment Center license(s):

Type	Status	Location
Cultivation, Tier 1/Indoor (up to 5,001 sq. ft.)	Final License	Fitchburg
Product Manufacturing	Provisional License	Fitchburg
Retail	Commence Operations	Fitchburg
Retail	Commence Operations	Watertown
MTC	Commence Operations	Fitchburg-Watertown
MTC	Commence Operations	Fitchburg-Dorchester

3. List of all required individuals and their business roles in the Medical Marijuana Treatment Center:

Individual	Role
David Clapper	Person Having Direct/Indirect Control
William Landman	Person Having Direct/Indirect Control
Alex Chadwick	Person Having Direct/Indirect Control
Alex Hardy	Person Having Direct/Indirect Control
Robert Gorovitz	Person Having Direct/Indirect Control
Morey Goldberg	Person Having Direct/Indirect Control
James Aresty	Person Having Direct/Indirect Control
Marjorie Honickman	Person Having Direct/Indirect Control
ShirleyHahn	Person Having Direct/Indirect Control
Patrick LaRose	Person Having Direct/Indirect Control

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Juan Briz	Person Having Direct/Indirect Control
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4. List of all required entities and their roles in the Medical Marijuana Treatment Center:

Entity	Role
Natural Selections MA, Inc.	Entity Having Direct/Indirect Control
MLH Holdings, LLC	Entity Having Direct/Indirect Control
Linaria Investments, LLC	Entity Having Direct/Indirect Control
Lobelia Holdings, LLC	Entity Having Direct/Indirect Control
The Lavatera Trust	Entity Having Direct/Indirect Control
MLIP MLH Investments, LLC	Entity Having Direct/Indirect Control
The James Aresty 2008 Irrevocable Trust	Entity Having Direct/Indirect Control
L2015H, LLC	Entity Having Direct/Indirect Control
MLH MSO Holdco, Inc.	Entity Having Direct/Indirect Control

5. The applicant executed a Host Community Agreement with Fitchburg on May 2, 2017, and June 20, 2018.
6. The applicant conducted a community outreach meeting on April 28, 2021, and provided documentation demonstrating compliance with Commission regulations.
7. The Commission sent a municipal notice with a copy of the application to the City/Town of Fitchburg on July 9, 2021. The Commission did not receive a response within 60 days pursuant to 935 CMR 501.102(3)(4)(c).
8. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Recruit 25% of its employees from areas of disproportionate impact, specifically Fitchburg and parts of Boston and Massachusetts residents who have, or have parents or spouses who have, past drug convictions.
2	Contribute a minimum of \$10,000, annually, to local charities which may include, but not limited to, Making Opportunity Count f/k/a Montachusett Opportunity Council.
3	Host semi-annual company volunteer outings with a goal of having a minimum of ten (10) employees per event.

## **SUITABILITY REVIEW**

9. There were disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions. None of the disclosures raised suitability issues.



10. There were no concerns arising from background checks on the individuals or entities associated with the application.

### **MANAGEMENT AND OPERATIONS REVIEW**

11. The applicant states that it can be operational once receiving the provisional license(s).
12. The applicant's proposed hours of operation are the following:

#### **Cultivation and Product Manufacturing**

<b>Day(s)</b>	<b>Hours of Operation</b>
Monday-Sunday	24 Hours

#### **Retail**

<b>Day(s)</b>	<b>Hours of Operation</b>
Monday-Sunday	8:00 a.m. – 8:00 p.m.

13. The applicant submitted all applicable and required summaries of procedures for the operation of the proposed Medical Marijuana Treatment Center. The summaries were determined to be substantially compliant with the Commission's regulations.
14. The applicant disclosed that it plans to perform home deliveries to registered patients. The summary of the applicant's plan is consistent with the Commission regulations and guidance documents.
15. The applicant proposed the following goals for its Diversity Plan:

<b>#</b>	<b>Goal</b>
1	Recruit 48.8% Women, 20.7% Minorities, 12% Persons with Disabilities, 3.5% Veterans and 10% L.G.B.T.Q. + for its hiring initiatives.
2	Offer 100% of the Company's opportunities for advancement to management and executive positions internally, thereby providing opportunities to its diverse workforce, to the extent its workforce has been filled by diverse individuals for advancement.
3	Ensure 100% of its employees receive training on diversity and sensitivity.

16. Summary of cultivation plan:

The applicant submitted a summary of a cultivation plan that demonstrated the ability to comply with the regulations of the Commission.

17. Summary of products to be produced and/or sold (if applicable):

<b>#</b>	<b>Product</b>
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1	Chocolate Bars (Dark and Milk)
2	Gummies (Watermelon, Pomegranate, Raspberry, Blueberry, Mango and Tangerine)
3	Lozenges (Lemon)
4	Topicals
5	Lotions
6	Salves
7	Oils
8	Sprays
9	Waxes
10	Shatter
11	Vape Oil
12	Tinctures
13	Keif
14	Pre-rolled Cannabis Joints

## **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws.
3. Final licensure is subject to the applicant providing Commission staff, upon inspection, with a detailed list of all proposed products to be produced with specific information as to types, forms, shapes, colors, and flavors.
4. The applicant shall cooperate with and provide information to Commission staff.
5. Provisional licensure is subject to the payment of the appropriate license fee.
6. Final license is subject to the applicant providing a letter confirming support and acceptance of financial contributions from Montachusett Opportunity Council.
7. Final license is subject to the applicant reviewing its diversity hiring goals based on statistics of community and region and not just based on overall state statistics.
8. Final license is subject to the applicant clarifying and limit Plan to Positively Impact Disproportionately Harmed People goals for its Host Community of Fitchburg and pending provisional application for Fitchburg operations.

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

