Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

CANNABIS CONTROL COMMISSION

December 11, 2025
10:00 AM

In-Person at Cannabis Control Commission, Second Floor Public Meeting Room, Worcester Union Station, 2 Washington Square, Worcester and with Remote Access via Microsoft Teams Live*

PUBLIC MEETING MINUTES

Documents:

- Application Materials associated with:
  - Staff Recommendations on Changes of Ownership
  - Staff Recommendations on Renewal Licenses
  - Staff Recommendations on Provisional Licenses
  - Staff Recommendations on Final Licenses
  - Staff Recommendations on Responsible Vendor Training Renewals
- Meeting Packet
- December 11, 2025, email from Scott Murphy to Commissioner Roy.
- Wall Street Journal Article.

In Attendance:

- Chair Shannon O'Brien
- Commissioner Carrie Benedon
- Commissioner Kimberly Roy
- Commissioner Bruce Stebbins

Minutes:

I. Call to Order
- The Chair recognized a quorum and called the meeting to order.
- The Chair gave notice that the meeting is being recorded.
- The Chair gave an overview of the agenda.

II. Commissioners' Comments & Updates – 00:02:11
- Commissioner Roy applauded the work done to bring Social Consumption (SC) to fruition. She delineated three areas where the Commission should take action to advance public health in testing, particularly to address potency inflation and lab shopping in this framework: (1) an internal reference laboratory/confirmatory lab, (2)

a secret shopper program, and (3) de-anatomized and open data. Commissioner Stebbins noted visits to Gardner and an operation in Fitchburg. He also noted a meeting where himself, the ED and the Department of Government Affairs and Policy (DGAP) virtually presented before Director Anne Gobi, covering topics of SC, hemp, the status of Cannabis as Commonwealth's top crop and developments in respect to delivery. He thanked everyone who brought SC to fruition and expressed his desire to focus on badging and Independent Testing Labs (ITLs) and thanked Megan Dobro. The Chair thanked Commissioner Benedon for her help on SC. The Chair concluded by mentioning that restrictions were removed in the final iteration of SC regulations and stated she was taking the agenda out of order throughout the whole meeting.

III. Staff Recommendations on Provisional Licenses – 00:10:26

- Licensing Manager Tsuko Defoe (Manager Defoe) presented on behalf of the Licensing department the Staff Recommendations for Changes of Ownership, Renewals, Provisionals, Final Licenses and Responsible Vendor Training Renewal Licenses.

1. Capeway Cannabis, LLC (#MRN285074), Marijuana Retailer
   - Commissioner Roy moved to approve the Provisional License.
   - Commissioner Benedon seconded the motion.
   - The Chair took a roll call vote:
     - Commissioner Benedon – Yes
     - Commissioner Roy – Yes
     - Commissioner Stebbins – Yes
     - Chair O'Brien – Yes
   - The Commission unanimously approved the Provisional License.

2. CloudNine Visions, LLC (#MRN283505), Marijuana Retailer
   - Commissioner Stebbins moved to approve the Provisional License.
   - Commissioner Benedon seconded the motion.
   - The Chair took a roll call vote:
     - Commissioner Benedon – Yes
     - Commissioner Roy – Yes
     - Commissioner Stebbins – Yes
     - Chair O'Brien – Yes
   - The Commission unanimously approved the Provisional License.

3. Chief Cannabis, LLC (#MRN285404), Marijuana Retailer
   - Commissioner Benedon moved to approve the Provisional License.
   - Commissioner Stebbins seconded the motion.
   - The Chair took a roll call vote:
     - Commissioner Benedon – Yes

    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
  - The Commission unanimously approved the Provisional License.

4. DMS Trinity, LLC (#MRN284810), Marijuana Retailer
  - Commissioner Roy moved to approve the Provisional License.
  - Commissioner Stebbins seconded the motion.
  - The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
  - The Commission unanimously approved the Provisional License.

5. Just Creatives, LLC (#DOA100195), Marijuana Courier
  - Commissioner Benedon moved to approve the Provisional License.
  - Commissioner Roy seconded the motion.
  - The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
  - The Commission unanimously approved the Provisional License.

6. Melting Pot Manufacturing (#MPN282356), Marijuana Product Manufacturer
  - Commissioner Roy moved to approve the Provisional License.
  - Commissioner Stebbins seconded the motion.
  - The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
  - The Commission unanimously approved the Provisional License.

7. Paper Crane Provisions, LLC (#MPN282365), Marijuana Product Manufacturer
  - Commissioner Stebbins moved to approve the Provisional License.
  - Commissioner Roy seconded the motion.
  - The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes

- The Commission unanimously approved the Provisional License.

8. TMAP1 LLC (#MPN282344), Marijuana Product Manufacturer
    - Commissioner Roy moved to approve the Provisional License.
    - Commissioner Stebbins seconded the motion.
    - The Chair took a roll call vote:
        - Commissioner Benedon – Yes
        - Commissioner Roy – Yes
        - Commissioner Stebbins – Yes
        - Chair O'Brien – Yes
    - The Commission unanimously approved the Provisional License.

IV. Staff Recommendations on Renewal Licenses – 00:18:17

- Commissioner Stebbins noted that no condition attached was necessary but commented that Diem Orange LLC made a goal for their Positive Impact Plan (PIP) to contribute to the Social Equity Trust Fund. He added that the fund is not something the Commission ran but noted that the Executive Office of Economic Development (EOED) had now set it up so Licensees could make contributions. Commissioner Stebbins noted Chapter 180 and the changes to the regulations where you can now meet your efforts of your PIP by contributing to the Social Equity Trust Fund.
- Commissioner Stebbins moved to approve the renewal of items numbered 1 – 20 as indicated on the agenda.
- Commissioner Benedon seconded the motion.
- The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
- The Commission unanimously approved the renewal of items numbered 1 – 20 as indicated on the agenda.

- The Chair noted her mistake of stating 20 Licenses instead of 30 in the previous motion.
- The Chair moved to amend the previous motion to the renewal of items numbered 1 – 30 as indicated on the agenda.
- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes

- The Commission unanimously approved the motion as amended to the renewal of items numbered 1 – 30 as indicated on the agenda.

V. Staff Recommendations on Final Licenses – 00:24:58

1. Healing Greene Massachusetts, LLC (#MR284583), Marijuana Retailer
2. Hometown Harvest, LLC (#MR285387), Marijuana Retailer
3. New England Regional Dispensary, LLC (#MR285281), Marijuana Retailer
4. SAWF Estate, LLC (#MR284312), Marijuana Retailer

- Commissioner Roy moved to approve the Final Licenses.
- Commissioner Benedon seconded the motion.
- The Chair took a roll call vote:
  - Commissioner Benedon – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Chair O'Brien – Yes
- The Commission unanimously approved the Final Licenses.

VI. Staff Recommendations on Responsible Vendor Training Renewals – 00:25:48

1. Bud Education (#RVR453164)
   - Commissioner Roy moved to approve the Responsible Vendor Training License Renewal.
   - Commissioner Stebbins seconded the motion.
   - The Chair took a roll call vote:
     - Commissioner Benedon – Yes
     - Commissioner Roy – Yes
     - Commissioner Stebbins – Yes
     - Chair O'Brien – Yes
   - The Commission unanimously approved the Responsible Vendor Training License Renewal.

VII. Staff Recommendations on Changes of Ownership – 00:27:34

- Commissioner Roy noted that Theory Wellness was one of four ESOPs operating in the Commonwealth and commented that Employee Stock Ownership Plans (ESOPs) had been positively received in terms of employee morale and productivity. She also shared that she wanted Change of Ownerships covered in a future meeting due to the increase in receiverships. Commissioner Stebbins noted that he thought ESOPs were also effective in transitioning people out of the Cannabis industry.

1. Coastal Cultivars, Inc. – add two individuals and one entity.
   - Commissioner Roy moved to approve the Change of Ownership.

- Commissioner Benedon seconded the motion.
- The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
- The Commission unanimously approved the Change of Ownership.

2. Seven Leaf Sisters, Inc. – add four individuals and one entity.
    - Commissioner Benedon moved to approve the Change of Ownership.
    - Commissioner Stebbins seconded the motion.
    - The Chair took a roll call vote:
        - Commissioner Benedon – Yes
        - Commissioner Roy – Yes
        - Commissioner Stebbins – Yes
        - Chair O'Brien – Yes
    - The Commission unanimously approved the Change of Ownership.

3. Slang, Inc. – add three individuals and three entities.
    - Commissioner Roy moved to approve the Change of Ownership.
    - Commissioner Stebbins seconded the motion.
    - The Chair took a roll call vote:
        - Commissioner Benedon – Yes
        - Commissioner Roy – Yes
        - Commissioner Stebbins – Yes
        - Chair O'Brien – Yes
    - The Commission unanimously approved the Change of Ownership.

4. Theory Wellness Inc. – add one entity.
    - Commissioner Stebbins moved to approve the Change of Ownership.
    - Commissioner Roy seconded the motion.
    - The Chair took a roll call vote:
        - Commissioner Benedon – Yes
        - Commissioner Roy – Yes
        - Commissioner Stebbins – Yes
        - Chair O'Brien – Yes
    - The Commission unanimously approved the Change of Ownership.

VIII. Minutes for Approval – 00:35:28

- October 1, 2025
- Commissioner Roy moved to approve the October 1, 2025, Commission Public Meeting minutes.
- Commissioner Stebbins seconded the motion.

- The Chair took a roll call vote:
    - Commissioner Benedon – Abstained
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
- The Commission approved the October 1, 2025, Commission Public Meeting minutes by a vote of three in favor and one abstention.

- October 9, 2025 a.m.
- Commissioner Roy moved to approve the October 9, 2025 a.m., Commission Public Meeting minutes.
- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
    - Commissioner Benedon – Abstained
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
- The Commission approved the October 9, 2025 a.m., Commission Public Meeting minutes by a vote of three in favor and one abstention.

- October 9, 2025 p.m.
- Commissioner Roy moved to approve the October 9, 2025 p.m., Commission Public Meeting minutes.
- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
    - Commissioner Benedon – Abstained
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
- The Commission approved the October 9, 2025 p.m., Commission Public Meeting minutes by a vote of three in favor and one abstention.

- October 15, 2025
- Commissioner Roy moved to approve the October 15, 2025, Commission Public Meeting minutes.
- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
- The Commission unanimously approved the October 15, 2025, Commission Public Meeting minutes.

- Commissioner Roy asked where the public could access the Executive Session meeting minutes. The ED noted that they could be found in the meeting packet where the minutes were approved. He added he would look into making them more accessible. The Chair asked whether Executive Sessions were recorded and the ED responded that they were recorded for a period of time but had not been during his tenure.

IX. Commission Discussion and Votes – 00:45:23

- Commissioner Stebbins noted that the information on how to contribute to the Social Equity Fund was on the EOED website. The Chair thanked staff for providing the information.

- Commissioner Roy moved to take a recess returning at 11:10 AM.
- Commissioner Benedon seconded the motion.
- The Chair took a roll call vote:
  - Commissioner Benedon – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Chair O'Brien – Yes
- The Commission unanimously approved the motion.
- The Commission took a brief recess. (Returned at 00:59:12.)

9. Final Vote of Draft Social Consumption Regulations
   - The Chair and Commissioner Roy praised the work on SC. AGC Bruno advised on next steps. Commissioner Benedon expressed how thankful she was for everyone catching her up to speed so quickly. Commissioner Stebbins thanked everyone and briefly discussed looking forward to implementation. Commissioner Roy asked Deputy General Counsel Michael Baker (DGC Baker) for the timeline on promulgation and DGC Baker stated that January 2, 2025 was anticipated as the date for full promulgation. The ED added context around an additional 6-month period after the regulations were promulgated and stated that working groups with Commissioners would continue to work on public awareness and dissemination of information, with external assistance from other state agencies and Commissions. Commissioner Roy thanked her colleagues, particularly those participating in working groups.

   - Commissioner Stebbins moved to approve the final draft of revisions to 935 Code Mass. Regs. § 500.00 and 935 Code Mass. Regs. § 501.00, regarding Social Consumption.
   - Commissioner Roy seconded the motion.
   - The Chair took a roll call vote:
     - Commissioner Benedon – Yes

    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
- The Commission unanimously approved the motion.

- Commissioner Roy moved to take a recess returning at 12:10 PM.
- Commissioner Benedon seconded the motion.
- The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
- The Commission unanimously approved the motion.
- The Commission took a brief recess. (Returned at 02:39:06.)

- The Chair noted they spoke with members of the media about the SC regulations during the break. The Chair stated they needed to take another vote regarding SC to include language to authorize staff and the Legal department to make any ministerial edits and to send to the Secretary of State's Office (SOS). The Chair noted the need to reconsider the previous vote with the added amendment, and she read the motion language: to approve 935 Code Mass. Regs. § 500.00 and 935 Code Mass. Regs. § 501.00 as final including all amendments related to Social Consumption Establishments and all other amendments resulting from Commission deliberations. Further, to authorize staff and the Legal department to finalize these regulations, to make any ministerial edits necessary and consistent with Commission deliberations and votes and the Commission's governing laws and the Secretary of the Commonwealth's requirements, and to take any additional steps necessary to file the final regulations with the Secretary of the Commonwealth.

- Commissioner Roy moved to reconsider the last vote the Commissioner's took with the further amended language.
- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
- The Commission unanimously approved the motion as amended.

5. New Metrc Product Catalog with COAs
    - Chief Technology and Innovation Officer Paul Clark (CTIO Clark) introduced Jessica Painter and Brent Doherty from Metrc. Commissioner Roy stated that the system needed to be user-friendly for the Consumer. Jessica Painter presented and

demonstrated how the system worked in Nevada. She explained how a Certificate of Analysis (COA) made information available and mentioned that Massachusetts currently kept records for seven years, while Nevada only retained records for 180 days. CTIO Clark advocated reducing the period from seven years and to a 18-24 month retention period, tied to one-year after an item was last sold. He also clarified that Metrc would capture the time limits. Commissioner Stebbins requested informational updates to keep the public updated and Jessica Painter affirmed that it could be accomplished. Topics and deadlines before taking the vote on the new Metrc catalog were discussed. The ED observed that Connecticut was experiencing problems with the system. The Chair, the ED and Commissioner Roy discussed why opt-outs should or should not exist. The Chair stated she did not favor ITLs to have an opt-out option. Commissioner Roy compared it to the SC vote not containing an opt-out. The ED agreed to follow up on the concerns and affirmed that the laboratory identification would be de-anonymized. Commissioner Benedon advocated for clarity and questioned if the Commission potentially making the data public, clashed with its need to keep some information confidential and be in line with its own regulatory language. Commissioners Stebbins and Roy discussed slight COA variations, with Connecticut currently attempting to provide uniformity. The ED stated that the goal for aggregate data was set for the spring of 2026 and then broke down what the waivers would address. The Chair asked if Commissioner Roy wanted to re-state her motion. General Counsel Kajal Chattopadhyay (GC Chattopadhyay) stated that the Commission could potentially be exposed to a lawsuit. The Chair stated that the Commission was exposed to potential liability due to lack of oversight over testing. GC Chattopadhyay stated that Commission must protect proprietary information and the Chair stated that the Commission was not publishing customer lists, just laboratory names. GC Chattopadhyay raised the concern of protecting the Commission, and the Chair shared she was more concerned with liability by withholding information. Commissioner Roy mentioned the Wall Street Journal and CBS News having cited the Commission for past failures, comparing it to Consumer fraud. Commissioner Stebbins mentioned the issue of making laboratory names more available and the need for the Commission to periodically update testing data. GC Chattopadhyay expressed wanting regulations for keeping confidential information private. The ED stated that waivers and other issues were continually being developed. GC Chattopadhyay stated that both disclosures and protecting the Commission and protected information could both be ensured. Commissioner Stebbins expressed being increasingly reassured that private laboratory information would not be released in the COA.

- Commissioner Roy moved to direct the Executive Director and Chief of Technology Innovation Officer to adopt the new METRC catalog which will also contain Certificates of Analysis for each product, to be published by March 2026, subject to a proposed retention period by Executive Director and Chief Technology Innovation Officer.
- Commissioner Benedon seconded the motion.

- The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
- The Commission unanimously approved the motion.

6. Updates to the Testing Data on the Commission Open Data Website
    - CTIO Clark reported that the IT department and Data Analytics team were preparing to update the data testing data on the Commission open data website with a two year look back, with a publish date of March 2026. He mentioned looking for guidance on content and expressed that it would be updated on a quarterly basis. Commissioner Roy applauded everyone for protecting public health. Commissioner Stebbins asked about timeline and the ED clarified. Commissioner Stebbins noted he was not comfortable voting on it then and requested it be on an agenda in January. Commissioner Roy read the suggested motion language.

    - Commissioner Roy moved to take a recess returning at 2:45 PM.
    - Commissioner Stebbins seconded the motion.
        - Commissioner Benedon – Yes
        - Commissioner Roy – Yes
        - Commissioner Stebbins – Yes
        - Chair O'Brien – Yes
    - The Commission unanimously approved the motion.
    - The Commission took a brief recess. (Returned at 04:42:22.)

X. Executive Director and Commission Staff Report

2. Licensing Updates
    - The ED opened the floor to Manager Defoe and Licensing Analyst Jaime Wakefield (Analyst Wakefield). Analyst Wakefield presented the licensing updates as of December 11, 2025, regarding Cultivators and Host Community Agreement (HCA) data. Regarding Cultivator total canopy, Analyst Wakefield explained that the total canopy is not the total square feet that is currently in use but rather that could be in use if every Cultivator produced up to the maximum of their tier. The Chair asked for an overview of canopy tiers and relegation if a Cultivator does not produce to the limits of their tier. Commissioner Roy explained that the Board had voted and as of January 1, pursuant to 935 Code Mass. Regs. § 500.050, the Commission may reduce a Licensee's maximum canopy to a lower tier if the licensee did not sell 70% of production during the prior six months for indoor or harvest season for outdoor. Licensing Analyst Wakefield also stated that there were currently four businesses in receivership that the Legal department was tracking. Commissioner Roy expressed interest in following up on receiverships.

1. 2025 Goals Review
    - The ED stated he had just returned from Cannabis Regulators Association (CANNRA) and wanted to share his notes in the future. The ED stated that pursuant to prior delegated authority he authorized Enforcement Counsel to extend the payment due date for Assured's second payment per the stipulated agreement, to not extend beyond the payment due date for the third payment. The Chair noted that this authority has been delegated and also advocated for a review of 73 matters that were previously delegated to staff to ensure Commissioner awareness and accountability. The Chair stated the need to balance public health and safety issues with requirements and protections under M.G.L c. 30A.
    - The ED delineated the 2025 interim goals. The ED reported the short-term goals substantially completed as including: governance charter finalization; 2026 budget; establishment of medical program working group; hold Cannabis Advisory Board meeting; and complete implementation of Chapter 180. Regarding progress on full-year goals, the ED noted progress on lab testing guidelines, with recommendations anticipated in December/January; working on create a working group regarding Center for Cannabis Research & Policy; and Delivery Exclusivity Report anticipated from the Donohue Institute shortly. He added that the Red Tape Removal Working Group was in formation and the strategic plan discussion for EquityWorks will be scheduled. He expressed that Social Consumption Regulations would be checked off today and noted that there were nine employees currently out on leave.

XI. Commission Discussion and Votes (Cont.) – 05:21:40

1. Job Description: Director of Testing
    - The Chair noted that there had not been a Director of Testing remaining in the position for a long amount of time. The ED advocated reposting the position with adjustments to the job description and incentives for potential candidates, with a focus on compliance. The ED stated if he were to repost the same position with minor changes to the description he could go ahead and do that and would ask the Board to vote on a title change or more substantial change to the position. Chief People Officer Debra Hilton-Creek (CPO Hilton-Creek) added her comments, noting the large compliance component of the position. The Chair noted the urgency of the role. Commissioner Stebbins advocated that the position be re-titled Director of Testing Compliance and the description of the position clarified so there is no confusion about the intention of the job, especially as regard to overseeing the ITLs. Commissioner Benedon expressed that she felt the filling of the position was very necessary and thought it was appropriate to change the title of the position during that meeting. Commissioner Roy felt that increasing available data would help the next Director to succeed in this position.
    - Commissioner Stebbins moved to approve a change in title from Director of Testing to Director of Testing Compliance with associated minimal changes to the job description and posting.
    - Commissioner Benedon seconded the motion.

- The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
- The Commission unanimously approved the motion.

- The Chair requested that the topic of Procedure of Legal Intervention be moved to the January 2026 Public Meeting. Commissioner Roy read into record an email from Scott Murphy from Parallel regarding issues with deficiencies and corrective actions. The Chair referenced Alcoholic Beverage Control Commission (ABCC) and mentioned regular meetings with Licensees potentially to help reduce violations. Commissioner Roy mentioned many questions from Licensees and stakeholders regarding the most commonly issued Notice of Deficiencies (NODs) to help with keeping them in compliance and expressed how information regarding NODs should be made public.

- Commissioner Roy moved to take a recess returning at 4:15 PM.
- Commissioner Benedon seconded the motion.
- The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
- The Commission unanimously approved the motion.
- The Commission took a brief recess. (Returned at 06:03:10.)

8. Notices of Deficiency Process Discussion
    - Chief of Investigations and Enforcement Nomxolisi Jones (Chief Jones) presented the NOD process, while advocating for training of Licensees. She shared that NODs are the most common regarding some issues like inventory discrepancies, signage, storage, and advertising. The ED remarked about how the red tape committee would be utilized to streamline the NOD process. Commissioner Roy asked why NODs were not appealable and Chief Jones stated that currently, NODs were not fined, like other states. Commissioner Benedon asked clarifying questions and Chief Jones stated that there was one NOD per date, with citation to regulations and NODs were not considered factors in renewals if there were corrections of the deficiencies. Chief Jones stated that NODs are rarely overturned but could be rescinded if there was a mistake or a mis-cited provision. Director of Enforcement Training Armond Enos (Director Enos) stressed the educatory function in NODs. Commissioner Stebbins questioned why so many inspectors showed up for one inspection. Director Enos replied that the number of inspectors was not necessarily tied to potential severity of violations, but with a number of additional factors such as the need for training of inspectors and the size of the facility being inspected. Commissioner Roy asked if

there were checks and balances, where a superior reviewed the content of a NOD and it was answered that peer reviews were ongoing. Commissioner Roy asked about compiling for the Commission's site, the most commonly issued NODs per License type and Chief Jones advocated for the tailoring of information for the training of inspectors.

7. Vote for Commission Treasurer and Secretary CY2026

- Commissioner Stebbins moved to nominate Commissioner Benedon to serve as the Commission's Secretary for CY2026.
- Commissioner Roy seconded the motion.
- The Chair took a roll call vote:
  - Commissioner Benedon – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Chair O'Brien – Yes
- The Commission unanimously approved the motion.

- The Chair moved to nominate Commissioner Roy to continue as Treasurer for CY2026.
- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
  - Commissioner Benedon – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Chair O'Brien – Yes
- The Commission unanimously approved the motion.

3. Discussion and Vote on Omitted Data from 2025 Industry Report Regarding Public Health and Safety
   - Commissioner Roy asked why information was redacted or removed from the Research department's report by the Legal department and wanted to address the process. The Chair stressed the need for a state-wide testing division to ensure that the current temptation to alter data for the lab's fiscal incentives was not permitted. Commissioner Roy read a Wall Street Journal article's contents into the record, and she then remarked that the removal of data to the legislature thereby concerning Testing Consideration #5. Commissioner Stebbins asked if the whole paragraph should not have been removed and Commissioner Roy thought a citation to the WSJ or other source should have been included. The ED and the Chair discussed what constituted data and information, noting that "data" includes information. The Chair expressed that information was changed, sacrificing public safety for concerns about potential liability exposure to the Commission. Commissioner Stebbins stressed the demand for accuracy and honesty. Commissioner Roy mentioned comments from the Legal department on Consideration #6 and questioned the meaning of the edit from

Legal. The ED observed that other departments also participated along with the Legal department in suggesting edits. GC Chattopadhyay clarified that privilege had been lifted so he is authorized to speak and stated that in general Legal aimed to harmonize comments from various departments and stated that beyond that general approach he had no further comments at the time. Commissioner Roy enquired why the GC removed "economic pressure" as a driving force and GC Chattopadhyay cited potential Commission exposure to liability as the primary factor for making the recommendation. The Chair asked if the GC considered Commission liability for hiding information. The Chair opined that the Commission was potentially liable for not following through on testing issues. GC Chattopadhyay stated he did not know what actions the Enforcement Counsel (EC) was undertaking regarding the potentially violative testing laboratory at that former time. The GC stood by the edit and did not see the need to include the WSJ article in the report because the article was publicly available. The ED clarified some issues which were currently under consideration, namely that the considerations in the report were improved for clarity through the editing process, and that if the Board is looking to update the considerations it can do so and otherwise can implement new procedures for future reports. Commissioner Roy noted that it was agreed in discussion with Commissioner Benedon and the Research team that Commissioners should see and approve track changes. Commissioner Benedon confirmed the discussion was to view track changes in previous drafts of the reports from all departments, not only proposed edits from Legal. The Chair believed that the Standard Operating Procedure (SOP) did not allow for last-minute changes. Commissioner Roy stated that the two-year delay in producing the report was inappropriate. The ED stressed the need to support the Research department and thought that moving forward, information should be shared with other departments too. The ED noted that the discussion on November 18 suggested data sets had been removed from the report and emphasized that did not occur. Commissioner Roy and the ED discussed how data can assist with future improvements. Commissioner Roy proposed a motion regarding SOPs for future reports and Commissioner approval of track changes. Commissioner Stebbins and ED made minor suggested changes to the motion. The Chair presented the tentative schedule of 2026 meeting dates.

XII. New Business Not Anticipated at the Time of Posting – 07:01:40

- The Chair stated that there was no new business which was not anticipated at the time of posting.

XIII. Next Meeting Date – 07:01:50

- The Chair stated that the next meeting was scheduled for January 15, 2026.

XIV. Commission Discussion and Votes (Cont.) – 07:04:35

- The ED noted that they tabled discussions of Procedure of Legal Intervention and FY2027 Budget Discussion.

3. Discussion and Vote on Omitted Data from 2025 Industry Report Regarding Public Health and Safety (Cont.)
    - Commissioner Roy proposed draft language. Commissioner Stebbins asked why the Director of Communications was included and Commissioner Roy clarified they would be involved in any public facing document. Commissioner Benedon pointed out that per the SOP and process for Chiefs review, the Research department retains final ownership and independence over the report and could ultimately reject track changes and expressed it was clear from odiscussion that staff felt the changes to the report from Legal and other departments strengthened the report. The ED confirmed the Research Department had discretion whether to accept proposed edits. Commissioner Stebbins expressed reservations about Commissioners reviewing track changes and stressed the necessity to adhere to the SOP. Commissioner Benedon recommended tweaking the language for clarity around Commissioners reviewing all track changes in research reports. Commissioner Stebbins agreed. The ED reiterated his role in the process.
    - Commissioner Benedon moved that the Executive Director, Chief of Technology and Innovation Officer, Chief of Investigations and Enforcement and Director of Communications will work collaboratively and in a timely fashion to assist the Research department in gathering needed information to complete all reporting which the Cannabis Control Commission is required to complete on an annual basis under G. L. c. 94G, § 17. This will be done in a collaborative and timely fashion once the Research Department has communicated the information and timeline needed to do this statutory reporting. Further, staff will adhere to all Research Department SOPs.
    - Commissioner Roy seconded the motion.
    - The Chair took a roll call vote:
        - Commissioner Benedon – Yes
        - Commissioner Roy – Yes
        - Commissioner Stebbins – Yes
        - Chair O'Brien – Yes
    - The Commission unanimously approved the motion.

XV. Adjournment – 07:20:13

- Commissioner Stebbins moved to adjourn.
- Commissioner Roy seconded the motion.
- The Chair took a roll call vote:
    - Commissioner Benedon – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Chair O'Brien – Yes
- The Commission unanimously approved the motion.