

CANNABIS CONTROL COMMISSION

October 29, 2025

10:30 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:

- [Meeting Packet](#)
- October 9, 2025, 935 Code Mass. Regs. § 500.00 Draft Social Consumption Regulations.
- October 17, 2025, 935 Code Mass. Regs. § 501.00 Draft Social Consumption Regulations.
- Cannabis Control Commission Enhanced Code of Ethics.
- Office of the Comptroller letter opposing the appointment of an AED.

In Attendance:

- Chair Shannon O'Brien
- 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 – 00:37:44

- Commissioner Roy shared that she had attended three Cannabis-related conferences with intoxicating hemp, compliance and banking, and the state of the Cannabis industry as topics. Commissioner Stebbins noted a meeting with a doctor who sat on the Cannabis Advisory Board (CAB), primarily to speak about the cooling down period. The Chair mentioned that she also spoke to Dr. Jordan Tischler and emphasized that the Commission needed to focus on ethics, particularly addressing disparate treatment issues. The Chair addressed the need for everyone to adhere to



ethical and disclosure rules and then read appropriate sections from the Commission's Enhanced Code of Ethics.

III. Commission Discussion and Votes – 00:44:37

1. September 2023 – September 2025 Public Meeting Votes Discussion

- The Chair opined that during her absence from the Commission, a Chair was not properly designated before she returned as Chair. She also mentioned her aim to validate votes taken in her absence. Commissioner Roy asked the Chair if it would provide protection for Licensees, and the Chair responded that by doing so, Licensees were protected, and the Commission was also protected against potential lawsuits. The Chair mentioned that there were a handful of votes taken in her absence which were improper and called upon Associate General Counsel Steven Laduzinski (AGC Laduzinski) to identify six votes in question. Commissioner Roy asked AGC Laduzinski to specify the dates of the votes and the nature of the subject matter. AGC Laduzinski identified (1) a vote on September 18, 2023 to designate Commissioner Concepcion as Acting Chair (AC), (2) two discrete votes on September 21, 2023 to appoint Commissioner Concepcion as AC during the regulations review period and one to appoint her as AC through November 11-9-23, (3) a vote to re-appoint Commissioner Concepcion as AC into December 2023, (4) a vote on December 14, 2023 approving Commissioner Concepcion as AC until a permanent Executive Director (ED) was appointed and began their tenure, and (5) a vote on June 13, 2024 which concerned directing the Acting Executive Director (AED) to focus on personnel matters and hiring new personnel and to devolve her powers as AED to departments heads. Commissioner Roy read into the record M.G.L. c. 10, 76(j). The issue of the impact of a Commissioner voting in favor of their appointment as AC, in light of c. 268A prohibitions regarding one's financial self-interest, was raised. The Chair provided an analogy pertaining to a past AED appointment being at odds with the Commonwealth Comptroller's opinion, when former ED Shawn Collins appointed Chief Operating Officer Alisa Stack (COO Stack) as AED. Commissioner Roy read a letter from the Comptroller opposing the appointment of COO Stack as AED. The Chair extended the analogy of the appointment of COO Stack to the past votes from September 18, 2023, until the Chair returned as the Commission's Chair.
- Commissioner Roy moved to take a recess returning at 11:40 AM.
- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O'Brien – Yes
- The Commission unanimously approved the motion.
- The Commission took a brief recess. (Returned at 01:38:54.)



- Commissioner Stebbins expressed reservations around voting to confirm all but six votes and stated that it appeared to be logically inconsistent. He stated he would second the motion for the purpose of bringing it to a vote.
- Commissioner Roy moved to confirm all votes made in Public Meetings between 9/18/23 and 9/11/25 except for those made to vote for an Acting Chair on 9/18/23, 9/21/23, 11/9/23, 12/14/23, and 8/14/24, and on the Acting Executive Director's authority on 6/13/24.
- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Roy – Yes
 - Commissioner Stebbins – No
 - Chair O'Brien – Yes
- The Commission denied the motion by a vote of two in favor and one opposed.

2. Discussion and Review of Draft Regulations and Policy Questions

- Associate General Counsel Erica Bruno (AGC Bruno) presented the Social Consumption (SC) draft regulations. She read the proposed language about Indoor Smoking Consumption Area Requirements, 935 Code Mass. Regs. § 500.141(10)(h). Enforcement Counsel Timothy Goodin (EC Goodin) raised some questions around the approval by the ED for ventilation and filtration systems. He expressed that it placed burdens on Licensees, and the Commission did not have the expertise to render opinions on compliance of those systems. Director of Enforcement Training Armond Enos (Director Enos), along with Deputy General Counsel (DGC Baker), Associate General Counsel Philip Schreffler (AGC Schreffler), and Commissioner Roy discussed how the Commission performed architectural reviews and delivery vehicle reviews. DGC Baker noted that the Minimum Efficiency Reporting Value (MERV) standard was deemed adequate for purposes of the regulation section. Director Enos added that they did not have experts on staff for certain reviews and that they consult officials such as police and town planners. The Chair and Commissioner Roy discussed the effects on a small town's budget to assign resources to these compliance issues. The Chair stated that there was no consensus on the issue and tabled this matter. AGC Bruno then read proposed language from 935 Code Mass. Regs. § 500.141(10)(i), and Commissioner Roy asked about a time period. Commissioner Stebbins proposed that the inspection and certification times exceed twelve months for records retention. AGC Bruno proposed language for subsection (4) and commented that the Licensing department wanted to view data and then answered Commissioner Roy's query whether this provision was inconsistent with (h) language which pertained to expertise. AGC Bruno confirmed it did not because subsection (4) only dealt with records being available to the Commission. AGC Bruno then read proposed language for subsection (j). Commissioner Roy, Director Enos and DGC Baker discussed how notifications would occur in emergencies and to whom the reports were sent. Director Enos stated that 24-hour notices would go to the lead investigator(s) and within ten days a detailed report was required to be filed. Commissioner Stebbins proposed breaking (j) into two sections. Commissioner Roy



expounded on the proposal to have (j) address a Licensee needing to cease consumption and (k) to state the reporting requirements to the Commission which were necessary and consistent with previous practice.

- Commissioner Stebbins moved to take a recess returning at 1:25 PM.
- Commissioner Roy seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Yes
- The Commission unanimously approved the motion.
- The Commission took a brief recess. (Returned at 3:29:32.)

- AGC Bruno continued and read proposed language from 935 Code Mass. Regs. § 500.103(1)(i). Commissioner Roy expressed concern that requiring only compliance without a stamp of approval could compromise safety and constitute the watering down of safety provisions. The ED shared his previous experience in the area and promised to report back with his findings. AGC Bruno read proposed material, concerning expiration and renewal of licensures, pointing out to Commissioners Roy and Stebbins that the section was designed to use language consistent with another section of the regulations. Commissioner Roy urged for “including but not limited” verbiage and AGC Bruno noted the suggestion. AGC Bruno suggested that Personal Protective Equipment (PPE) language mirrored outdoor and indoor protections, and the Commissioners agreed. Commissioner Roy moved to strike 935 Code Mass. Regs. § 500.141(12) pertaining to Cooling Down Area Requirements. The Chair shared many of Commissioner Roy’s concerns and added her own observations based on talking to potential SC operators. She also mentioned that a Cooling Down Area would raise costs. Commissioner Stebbins noted that the history of a Cooling Down Area came from the Commission’s visit to California establishments. He added his concerns for health and safety of patrons who experienced negative reactions after consuming Cannabis. Commissioner Stebbins stated that Dr. Jordan Tischler favored the Cooling Down Area concept. AGC Bruno turned everyone’s attention to 935 Code Mass. Regs. § 500.150(4). The Chair requested background on rationale for edible dosing regulations and asked why the “point of service” and “at one time” for consumption verbiage was added. It was clarified that edible serving size was defined. Commissioner Roy asked if Delivery Operators should be mentioned in the clause, as they were “retailers on wheels,” and DGC Baker stated that 935 Code Mass. Regs. § 500.150(2)(b) already covered Delivery Operators. AGC Bruno introduced material from 935 Code Mass. Regs. § 500.146(2)(d), and there were no follow-up questions or comments by the Commissioners.
- AGC Bruno read proposed amendments to the Medical Marijuana draft regulations. She noted minor definitional and grammatical changes for “Inversion” and “Registered Qualifying Patient or Patients.” AGC Bruno read material from 935 Code Mass. Regs. § 501.029, which dealt with keeping Independent Testing Labs (ITLs)



agents on the same basis as others. After AGC Bruno read material from 935 Code Mass. Regs. § 501.105, along with material which was to be stricken, there was no opposition from the Commissioners to these amendments. AGC Bruno read 935 Code Mass. Regs. § 500.110(1)(l), pertaining to security and “sold and stored” was added. Commissioner Stebbins offered a friendly amendment that it would now read “sold or stored.” A citation correction was made to 935 Code Mass. Regs. § 501.850(3). Chief Technology and Information Officer Paul Clark (CTIO Clark) discussed artificial intelligence (AI) and mentioned risks surrounding AI being used for publicly available documents. AGC Bruno read material from 935 Code Mass. Regs. § 500.110, regarding out of sight adult use, addressing Commissioner Roy’s concerns. AGC Schreffler explained that if tents were utilized at events, it could convert an outdoor event to an indoor event. The Chair and Commissioner Roy followed up, with focus on height barriers and restrictive measures such as roping off an area, and an event being conducted or not conducted in plain sight. DGC Baker elucidated that “not visible from a public place” language could be tweaked. AGC Schreffler raised concerns that creating a privacy fence or other restrictions could negatively affect outdoors event. The Chair explored the concept of barriers further and she used the Big E annual festival in Springfield as an example for comparison of proposed outdoors Cannabis events. AGC Schreffler distinguished the difference between consuming an edible or infused drink and smoking Marijuana in public. He added that the smoking of Cannabis was more apparent as Cannabis consumption, as opposed to edibles and drinks, which is less obvious to the public not participating in the event. The ED provided insight from the State of Detroit’s model for outdoor public consumption. He added that fencing would not eliminate “top-down sight” of an open public consumption event. DGC Baker recommended reverting to older proposed language, re-focusing on storage and sale of product. Commissioner Stebbins differentiated edible consumption from smoking, as AGC Schreffler had previously done. The Chair shared advertising concerns and concerns around not wanting these License types to end up with problems which arose with the Craft Cooperative License. DGC Baker suggested that the advertising discussion continue offline. Commissioner Stebbins offered that non-smoking might be open to the public, as opposed to smoking. The ED stated that in Detroit, the only fully opaque site was the point-of-sale tent. The Chair opined that compromise could bridge line of sight perspectives. AGC Bruno then read the proposed language at 935 Code Mass. Regs. § 500.050(6)(f)3., with DGC Baker reviewing the Alcoholic Beverages Control Commission (ABCC) protocols and the Detroit example, for consecutive days for an event with one submission for consecutive days would occur and Commissioners agreed. Commissioner Stebbins provided background for the 24 day and five consecutive days limits. The Chair offered that a 30-day limit might prove preferable to the 24-day limit. Commissioner Roy initiated a consideration of Cannabis “food trucks” or “moving events” that were not held in a consistent location, while endorsing the ABCC type of expansive model making it that Event Organizers had more opportunity to prosper. She proposed a 30-day limit in one location and a 30-day limit for other discrete locations. DGC Baker stated that the ABCC restricted



events to solely one address. AGC Bruno read 935 Code Mass. Regs. § 500.050(6)(f). The 90-day notice for public consumption public events was introduced for discussion, and after considering public input on this limit, all Commissioners recommended keeping the 90-day notice. Regarding 935 Code Mass. Regs. § 500.050(6)(f)3.f.5. and event briefings, the Massachusetts Chiefs of Police made recommendations on the issue around law enforcement and Emergency Medical Services (EMS) participating in the format of a template checklist to utilize and final check-off to utilize just before an event is held as they favored becoming involved in the pre-checks occurring earlier and in more front-loaded in terms of receiving information. The Chair favored the utilization of a checklist at the local level and Commissioner Stebbins emphasized that the initial checklist would be utilized just once and not on multiple occasions. EC Goodin raised inquiries from the Investigations and Enforcement (I&E) department about the number of meetings, how they would be held, and the need to update the Commission about changes of plans before the event commences and the advance notice needed by the I&E team. The Chair requested clarification to assist the Commission and the applicant, and adequate advance transparent notice. Commissioner Stebbins opined that a Commission guidance document could augment this clarification. Commissioner Roy cited 935 Code Mass. Regs. § 500.101 as a resource to effectuate the goal. AGC Burned shifted to 935 Code Mass. Regs. § 500.050(6)(f)3.w.. She added that this was adopted after the working group consulted with the Department of Revenue (DOR) and stated that the place of business of the Licensee is where the Host Community Agreement (HCA) must go through in the municipal process. EC Goodin cited M.G.L. c. 94G, s. 4, and the Commission's regulations, and fleshed out the issues surrounding advertisements with a cover charge with a free product once one is at the event. Commissioner Roy mentioned a \$20.00 ticket including a pre-roll. It was expressed that DOR was concerned with tax implications for sales and how the sales are structured. AGC Schreffler cited that the ticket seller might be different than the Event Organizers on the day(s) of the event, and the question might arise regarding if an entity or person is licensed by the Commission. AGC Bruno read the text of 935 Code Mass. Regs. § 500.050(9)(b) to address the potential split of proceeds to a non-Cannabis entity and a licensed organizer as per the Commission's regulations, noting when sales proceeds cannot be shared. EC Goodin cited 935 Code Mass. Regs. § 500.450(3) and mentioned other remedies to address potential advertising and tax implications. Commissioner Roy and EC Goodin discussed Metrc and pennyng out and where it could constitute diversion in some instances, which conflict with Commission regulations.

IV. Next Meeting Date – 06:25:50

- The Chair stated that the next meeting was scheduled for November 6, 2025.

V. Adjournment – 06:28:04

- Commissioner Stebbins moved to adjourn.
- Commissioner Roy seconded the motion.



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

