

First City Provisions, Inc.

MCN283405

MPN282048

MRN284138

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

First City Provisions, Inc.
d/b/a Legends
89 South Street, Holyoke, MA 01040

2. Type of license sought (if cultivation, its tier level and outside/inside operation) and information regarding the application submission:

Cultivation, Tier 2/Indoor (5,001-10,000 sq.ft.)
Product Manufacturing
Retail

The application was reopened three (3) times for its product manufacturing operations and four (4) times for its retail and cultivation operations for additional information.

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

The applicant is not an applicant or licensee for any other license type.

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use retail application and/or licenses under the name of Primus, LLC.

4. List of all required individuals and their roles in the Marijuana Establishment:

Individual	Role
Lamont Clemons	Person Having Direct/Indirect Control



5. List of all required entities and their roles in the Marijuana Establishment:

No other entity appears to have ownership or control over this proposed Marijuana Establishment.

6. Applicant's priority status:

Expedited Applicant (Minority-Owned Business)

7. The applicant and municipality executed a Host Community Agreement on March 22, 2021

8. The applicant conducted a community outreach meeting on February 15, 2022 and provided documentation demonstrating compliance with Commission regulations.

9. The Commission sent a municipal notice with a copy of the application to the City/Town of Holyoke on May 20, 2022 for its retail and product manufacturing operations and May 27, 2022 for its cultivation operations. The Commission did not receive a response within 60 days pursuant to 935 CMR 500.102(1)(d).

10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Recruit 25% of its workforce from Holyoke and ADIs as identified by the Commission.
2	Participate in a clean-up initiative in Holyoke at least once a month.

BACKGROUND CHECK REVIEW

11. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

MANAGEMENT AND OPERATIONS PROFILE REVIEW

13. The applicant states that it can be operational within one (1) year of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Retail

Day(s)	Hours of Operation
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Provisional License Executive Summary 2



Monday-Saturday	8:00 a.m. to 9:00 p.m.
Sunday	Closed

Cultivation and Product Manufacturing

Day(s)	Hours of Operation
Monday-Sunday	8:00 a.m. to 9:00 p.m.

15. The applicant submitted all required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit 50% or more women; 50% minorities; 25% LGBTQ+; 25% veterans; and 25% those with disabilities for its hiring initiative.
2	Acquire a list from the Supplier Diversity Office to engage with wholesale partners, vendors, and contractors who are minority-owned, women-owned, LGBTQ+ owned, or veteran-owned. We have a goal of working with 10% of wholesale partners who are minority or women owned, and 10% contractors and vendors who are diverse.
3	Promote 50% of Minorities; 25% LGBTQ+; 25% veterans; and 25% those with disabilities to management and/or supervisory positions.

17. Summary of cultivation plan (if applicable):

The applicant submitted a cultivation plan that demonstrates the ability to comply with the Commission's regulations.

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

#	Product
1	Pre-rolls
2	Gummy Cubes (Cherry, blueberry and orange)

19. Plan for obtaining marijuana or marijuana products (if applicable):

The applicant will obtain marijuana or marijuana products by contracting with other licensed establishments and/or obtain from its affiliated licenses.

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, local codes, ordinances or bylaws, and local licensing requirements.
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. Final license is subject to the applicant notifying the Commission of its “Additional Operational Plans for Indoor Marijuana Cultivators” as it relates to Quality Control Samples. Licensees that opt to provide Quality Control Samples must include written policies and procedures in accordance with 935 CMR 500.120(12)(i), and as expressly enumerated in 935 CMR 500.120(14).
5. Final license is subject to the applicant notifying the Commission of its “Additional Operational Plans for Product Manufacturers” as it relates to Quality Control Samples. Licensees that opt to provide Quality Control Samples must include written policies and procedures in accordance with 935 CMR 500.120(12)(i), and as expressly enumerated in 935 CMR 500.120(14).
6. Final license is subject to applicant providing the Commission with a copy of its consumer education. To ensure compliance, consumer educational materials shall include subsections; a – j, as listed in said regulation and must also include the phone number for the Massachusetts Substance Use Helpline.
7. The applicant shall cooperate with and provide information to Commission staff.
8. Provisional licensure is subject to the payment of the appropriate license fee.

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.

