

**Low Key, LLC**  
MRN283332

**APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Low Key, LLC  
571B Washington Street, Boston, Massachusetts 02124

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

Retail

The application was reopened more than four times for additional information.

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

Type	Status	Location
Cultivation, Tier 2/Indoor (5,001 – 10,000 sq. ft.)	Application Submitted	Boston
Marijuana Courier (Pre-Certification)	Application Submitted	N/A

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

Individual	Role
Jeff Similien	Person Having Direct/Indirect Control / Capital Contributor
Robert Nichols	Person Having Direct/Indirect Control / Capital Contributor

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



6. Applicant's priority status:

Economic Empowerment Priority Applicant  
(Jeff Similien – 70% Ownership - EE202286)

7. The applicant and municipality executed a Host Community Agreement on September 29, 2020.
8. The applicant conducted a community outreach meeting on January 6, 2020, and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 11, 2021, stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Give hiring preference (51%) to residents of Boston, within that percentage 80% will be residents of Dorchester.
2	Create an annual home buyer course for selected employees (3-4 employees selected by raffle) who will complete a mandatory home buyer/ real estate education course and, at the end of the course, receive \$4,000 from Lowkey to be used toward their home purchase closing costs.
3	Provide CORI sealing services to a minimum of five (5) individuals annually.

### **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 four (4) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

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



Monday-Friday	10:00 a.m. to 9:00 p.m
Saturday-Sunday	10:00 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	Give hiring preference to minorities (60%), women (50%), veterans (20%), people with disabilities (10%) and people identifying as LGBTQ+ (10%).
2	Low Key seeks an 85% retention rate of all employees on an annual basis and a 95% positive job satisfaction rating from all employees pertaining to workplace inclusion, safety and environment.
3	Source 60% of its suppliers, contractors and industry wholesale partners from businesses owned by or whose employees are a majority of minorities, women, veterans, persons with disabilities or individuals who are LBGTQ and/or identify as a nonnormative sexual identity

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

The applicant will obtain marijuana or marijuana products by contracting with other licensed establishments.

## **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, an updated Diversity Plan that provides any updates to hiring goals and projected number of employees.
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.

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.

