

Lowkey Cultivation, LLC

MCN283124

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Lowkey Cultivation, LLC d/b/a Lowkey Cultivation 54 Walter St., Boston, MA 02136

2. Type of license sought and information regarding the application submission:

Cultivation, Tier 2 / Indoor (5,001 – 10,000 sq. ft.)

The application was reopened more than four (4) times for additional information.

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

Please note that individuals associated with the proposed license are also associated with other adult-use cultivation, product manufacturing, retail licenses and marijuana delivery applications or licenses under the names of Low Key, LLC and Lowkey 2, LLC.

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

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

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:

Economic Empowerment Priority Applicant (Jeff Similien / 100% ownership / EE202286)

Provisional License Executive Summary 1



- 7. The applicant and municipality executed a Host Community Agreement on September 29, 2020.
- 8. The applicant conducted a community outreach meeting on April 19, 2022, and provided documentation demonstrating compliance with Commission regulations.
- 9. The Commission received a municipal response from the City of Boston on February 9, 2023, 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	Recruit at least 51% of its workforce from Boston. Within that percentage of
	Boston employees, the goal is to hire at least 80% from the town of Hyde
	Park. (Census Tracts: 1304.06; 1401.02; 1401.05; 1401.06; 1401.07; 1402.01;
	1402.02; 1404.4; 1404.5; 1401.07; 9807).
2	Create an annual home buyer course for selected employees who will
	complete a mandatory home buyer/real estate education course. At the end of
	the program \$4,000 will be provided to be used toward home purchase
	closing costs.

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 six (6) months of receiving the provisional license(s).
- 14. The applicant's proposed hours of operation are the following:

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 60% minorities, 50% women, 20% veterans, 10% people with
	disabilities, and 10% LGBTQ+ for its hiring initiatives.
2	Encourage participation among employees in activities geared towards
	supporting diversity by providing supplemental course offered regularly on
	implicit bias and cross-cultural communications.

17. Summary of cultivation plan (if applicable):

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

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. The applicant shall cooperate with and provide information to Commission staff.
- 4. Provisional licensure is subject to the payment of the appropriate license fee.
- 5. Prior to final licensure please inform the Commission of your "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), and 935 CMR 500.120(14).

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.