

NS AJO HOLDINGS, INC.

MRN283095

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

NS AJO Holdings, Inc. d/b/a Natural Selections 23 Elm Street, Building 2, Watertown, MA 02472

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 one (1) time for additional information.

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

Туре	Status	Location
Cultivation, Tier 2/Indoor	Provisional License	Fitchburg
(5,001 - 10,000 sq. ft.)		
Product Manufacturing	Provisional License	Fitchburg
Retail	Provisional License	Fitchburg
MTC	Final License	Fitchburg – Watertown
MTC	Provisional License	Fitchburg – Fitchburg
MTC	Application Submitted	Not Disclosed

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

Individual	Role
Aidan O'Donovan	Owner
Isador Mitzner	Owner
Brandon Banks	Owner
David Clapper	Owner

Provisional License Executive Summary 1



William Landman	Director
Alex Chadwick	Board Member for Natural Selections MA, Inc.
Ramon Rivera	CFO
Tyler Vines	Director of Retail Operations
Alex Hardy	COO
Robert Gorovitz	Close Associate
Morey Goldberg	Close Associate
James Aresty	Close Associate

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

Entity	Role
Natural Selections MA, Inc.	Parent Company
MLH Holdings, LLC	Entity with Direct or Indirect Authority
Linaria Investments, LLC	Entity with Direct or Indirect Authority
Lobelia Holdings, LLC	Entity with Direct or Indirect Authority
The Lavatera Trust	Entity with Direct or Indirect Authority
MLIP MLH Investments, LLC	Entity with Direct or Indirect Authority
The James Aresty 2008 Irrevocable	Entity with Direct or Indirect Authority
Trust	
L2015H, LLC	Entity with Direct or Indirect Authority
MLH MSO Holdco, Inc.	Entity with Direct or Indirect Authority

6. Applicant's priority status:

MTC Priority

- 7. The applicant and municipality executed a Host Community Agreement on November 19, 2019.
- 8. The applicant conducted a community outreach meeting on August 21, 2019 and provided documentation demonstrating compliance with Commission regulations.
- 9. The Commission sent the municipal notice to the City/Town of Watertown on May 20, 2020. To date the Commission has not received a response.
- 10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Recruit 25% of individuals from Fitchburg, allowable census tracts of Boston,
	Massachusetts residents who have, or have parents or spouses who have past
	drug convictions for its hiring initiatives.
2	Contribute a minimum of \$35,000 annually to local charities including, but
	not limited to, the Montachusett Opportunity Council.





Host semi-annual company volunteer outings with a goal of having a
minimum of 10 employees per event.

SUITABILITY REVIEW

- 11. There were disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions. None of the disclosures raised suitability issues.
- 12. There were no concerns arising from background checks on the individuals or entities associated with the application.

MANAGEMENT AND OPERATIONS REVIEW

- 13. The applicant states that it can be operational within three (3) months of receiving its provisional license(s).
- 14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 8:00 a.m. – 8:00 p.m.

- 15. The applicant submitted all applicable and 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	Provide job opportunities to minorities, women, veterans, people with
	disabilities, and LGBTQ+. The Company shall seek parity in its work force
	based on the American Community Survey (ACS) 2010 U.S. Census. Workforce
	availability statistics for the Total Civilian Labor Force for Massachusetts are as
	follows: Women 48.8%, Minorities 20.7%, Persons with Disabilities 12%, and
	Veterans 7%.
2	Offer advancement to management and executive positions internally to provide
	opportunities to its diverse workforce, to the extent its workforce has been filled
	by diverse individuals, for advancement.
3	Ensure employees receive training on diversity and sensitivity.

17. Summary of cultivation plan (if applicable):

Not applicable

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

Provisional License Executive Summary 3



Not applicable.

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

NS AJO Holdings, Inc. plans to obtain marijuana 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 and local codes, ordinances, and bylaws;
- 3. The applicant shall cooperate with and provide information to Commission staff; and
- 4. 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.

