



# Cannabis Control Commission February Public Meeting

Remote via Teams





## Meeting Book - Cannabis Control Commission February Public Meeting Packet

### Table of Contents

#### Call to Order & Commissioners' Comments/Updates

MEETING AGENDA 02.08.2024.docx

#### Minutes

20230919\_Mins\_Public Meeting\_For Commission Consideration.docx

20230921\_Mins\_Public Meeting\_For Commission Consideration.docx

09212023- Gilnack.pdf

MMA\_MMLAlettertoCCConCMR500.000.pdf

20230929\_Mins\_Public Meeting\_For Commission Consideration.docx

#### Executive Director's Report

#### Staff Recommendations on Changes of Ownership

F-COO XS-ASHLIS, INC.-v.2.docx

F-COO XS-AUNTY BUDZ LLC-v.2.docx

COO XS-CANNA PROVISIONS INC-v.2.docx

COO XS-WEST COUNTY COLLECTIVE LLC-v.2.docx

#### Staff Recommendations on Renewals

ME RENEWAL XS-FEBRUARY 2024-v.2.docx

MTC RENEWAL XS-FEBRUARY 2024-v.2.docx

#### Staff Recommendations on Final Licenses

FL XS-AURA CANNABIS COMPANY, LLC-MR282487-v.2.docx

FL XS-CANNABIS CONNECTION II, INC.-MR284816-v.2.docx

FL XS-DIEM ORANGE, LLC-MP281684-v.2.docx

FL XS-GRASSP VENTURES, LLC-MD1262-v.2.docx

FL XS-GREENER LEAF, INC-MR281790-v.2.docx

FL XS-R AND R VENTURES, LLC-MB281504-v.2.docx

FL XS-THE HOLISTIC CONCEPTS, INC.-MR283012-v.2.docx

FL XS-TREE MARKET LYNN, LLC-MR282587-v.2.docx

FL XS-UNDERGROUND LEGACY SOCIAL CLUB-MR284914-v.2.docx

#### Staff Recommendation on Provisional Licenses

PL XS-CHILL & BLISS-MRN284916-v.2.docx

PL XS-FADED FLOWERS, LLC-MCN283840-v.2.docx

PL XS-MEDICINE MAN SOLUTIONS-MRN283261-v.2.docx



PL XS-MELTING POT MANUFACTURING, INC-MPN281882-v.2.docx

PL XS-PURE TEWKSBURY, INC-MRN284994-v.2.docx

PL XS-THE COPLEY CONNECTION-MRN284935-v.2.docx

#### Staff Recommendations on Responsible Vendor Training

F-RVT XS-420 TRAINERS LLC-DCCN462255-v.2.docx

F-RVT XS-BRIGHT BUDS TRAINING-DCCN462226-v.2.docx

#### Staff Recommendations on Responsible Vendor Training Renewals

RVT RENEWAL XS-MACCTI, LLC-RVR453145-v.2.docx

#### Commission Discussion & Votes

240202-Bulletin-Safe-and-Sanitary.pdf

February 2024 Government Affairs Update.docx

#### Next Meeting Date & Adjournment

20240208 PPT.pptx



February 6, 2024

In accordance with Sections 18-25 of Chapter 30A of the Massachusetts General Laws and Chapter 107 of the Acts of 2022, notice is hereby given of a meeting of the Cannabis Control Commission. The meeting will take place as noted below.

CANNABIS CONTROL COMMISSION

**February 8, 2024  
10:00 AM**

**Remote via [Microsoft Teams Live\\*](#)**

PUBLIC MEETING AGENDA

- I. Call to Order
- II. Executive Session
  - 1. The Commission may enter executive session pursuant to G.L. c. 30A, § 21(a)(3) to discuss strategy with respect to litigation if an open meeting may have a detrimental effect on the litigating position of the public body and the Chair so declares
- III. Commissioners' Comments & Updates
- IV. Minutes
- V. Acting Executive Director and Commission Staff Report
  - 1. Social Equity Program Update
  - 2. Chapter 180 Implementation Update
- VI. Staff Recommendations on Changes of Ownership
  - 1. Ashli's, Inc.
  - 2. Aunty Budz, LLC
  - 3. Canna Provisions, Inc.
  - 4. West County Collective, LLC
- VII. Staff Recommendations on Renewal Licenses
  - 1. 220 ONEIL LLC (#MRR206749)
  - 2. 6 Bricks, LLC. (#MRR206580)
  - 3. Apothca, Inc. (#MRR206762)





4. Ascend Mass, LLC (#MRR206733)
5. Assured Testing Laboratories LLC (#ILR267933)
6. Atlantic Medicinal Partners, Inc. (#MCR140644)
7. Bask, Inc. (#MRR206697)
8. Bask, Inc. (#MRR206698)
9. Berkshire Roots, Inc. (#MRR206679)
10. Berkshire Roots, Inc. (#MXR126670)
11. Berkshire Roots, Inc. (#MCR140619)
12. Blossom Flower, LLC (#MDR272561)
13. Boston Bud Factory Inc. (#MRR206513)
14. Boston Bud Factory Inc. (#MPR244015)
15. Bracts & Pistils, LLC (#DOR5182967)
16. Canna Provisions Inc (#MRR206722)
17. Canna Provisions Inc (#MRR206758)
18. Caregiver-Patient Connection LLC (#MCR140651)
19. Caregiver-Patient Connection LLC (#MPR244122)
20. Caroline's Cannabis, LLC (#MPR244101)
21. Coastal Healing, Inc. (#MRR206717)
22. Coastal Healing, Inc. (#MCR140662)
23. Coil Brothers LLC (#MPR244083)
24. Cypress Tree Management Natick, Inc. (#MRR206754)
25. DMA HOLDINGS (MA), LLC (#MCR140654)
26. ELEVATION RETAIL II LLC (#MRR206748)
27. EMB Natural Ventures, LLC (#MCR140674)
28. Enlite Cannabis Dispensary, LLC (#MRR206759)
29. Farma Gardens LLC (#MBR169319)
30. Four Daughters Compassionate Care, Inc. (#MRR206665)
31. Full Harvest Moonz, Inc. (#MRR206715)
32. Grass Appeal LLC (#MPR244123)
33. Grass Appeal LLC (#MRR206755)
34. Grass Appeal LLC (#MCR140667)
35. Green Gold Group Inc (#MRR206781)
36. GreenStar Herbals, Inc. (#MRR206741)
37. Health Circle, Inc. (#MRR206735)
38. Holistic Industries, Inc (#MRR206761)
39. Holland Brands SB, LLC (#MRR206765)





40. Holyoke Smokes Corp (#MDR272568)
41. Ideal Craft Cannabis, Inc. (#MPR244048)
42. Ideal Craft Cannabis, Inc. (#MCR140572)
43. In Good Health, Inc. (#MCR140648)
44. In Good Health, Inc. (#MPR244107)
45. JOLO CAN LLC (#MRR206731)
46. JOLO CAN LLC (#MPR244116)
47. JOLO CAN LLC (#MCR140630)
48. Kaycha MA, LLC (#ILR267932)
49. Leaf Joy, LLC (#MRR206745)
50. Lunar Xtracts, Inc. (#MPR244103)
51. M3 Ventures, Inc. (#MRR206703)
52. MA Craft Cultivation LLC (#MCR140660)
53. Mass Tree Holdings, LLC (#MCR140672)
54. Mayflower Medicinals, Inc. (#MCR140638)
55. Natural Agricultural Products, LLC (#MRR206696)
56. New Dia Fenway LLC (#MRR206763)
57. New Dia, LLC (#MRR206734)
58. Northeast Alternatives, Inc. (#MRR206760)
59. Northeast Select Harvest Corp. (#MRR206739)
60. Nova Farms, LLC (#MRR206742)
61. Patriot Care Corp (#MRR206720)
62. Pharmacannis Massachusetts, Inc. (#MRR206771)
63. Pioneer Valley Extracts, Inc. (#MPR244097)
64. Power Fund Operations (#MCR140643)
65. Pure Industries, Inc. (#MCR140656)
66. Regenerative LLC (#MCR140647)
67. Resinate, Inc. (#MRR206726)
68. Resinate, Inc. (#MRR206747)
69. Richards Flowers LLC (#MBR169318)
70. Sanctuary Medicinals, Inc. (#MRR206769)
71. Sanctuary Medicinals, Inc. (#MRR206770)
72. Simply Lifted, INC (#MBR169328)
73. Slang, Inc. (#MRR206728)
74. Speedy Cannabis, LLC (#MDR272563)
75. Temescal Wellness of Massachusetts, LLC (#MRR206713)





76. The Fresh Connection Boston LLC (#MCR140657)
77. The Green Lady Dispensary, Inc. (#MRR206695)
78. The Green Lady Dispensary, Inc. (#MPR244092)
79. The Green Lady Dispensary, Inc. (#MCR140626)
80. The Harvest Club, LLC (#MRR206753)
81. The Verb is Herb, LLC. (#MRR206671)
82. Tower Three, LLC (#MCR140670)
83. Tradesman Exchange LLC (#MDR272566)
84. Twisted Growers LLC (#MPR244096)
85. Twisted Growers LLC (#MCR140632)
86. TYCA Green (#MRR206740)
87. TYCA Green (#MPR244120)
88. UC Cultivation, LLC (#MCR140663)
89. VanGarden Cannabis, LLC (#MPR244082)
90. VanGarden Cannabis, LLC (#MCR140608)
91. Verdant Reparative, Inc. (#MRR206552)
92. Verdant Reparative, Inc. (#MPR244070)
93. Wellness Connection of MA, Inc (#MRR206729)
94. West County Collective (#MCR140671)
95. Wiseacre Farm Inc. (#MCR140640)
96. 1622 Medical, LLC (#RMD1666)
97. Mass Alternative Care, Inc. (#RMD726)
98. PharmaCannis Massachusetts, Inc. (#RMD3045)
99. The Green Lady Dispensary, Inc. (#RMD885)

VIII. Staff Recommendations on Provisional Licenses

1. Chill & Bliss, LLC (#MRN284916), Retail
2. Faded Flowers, LLC (#MCN283840), Cultivation, Tier 1 / Indoor
3. Medicine Man Solutions, LLC (#MRN283261), Retail
4. Melting Pot Manufacturing, Inc. (#MPN281882), Product Manufacturing
5. Pure Tewksbury, Inc. (#MRN284994), Retail
6. The Copley Connection, LLC (#MRN284935), Retail

IX. Staff Recommendations on Final Licenses

1. Aura Cannabis Company, LLC (#MR282487), Retail
2. Cannabis Connection II, Inc. (#MR284816), Retail
3. Diem Orange, LLC (#MP281684), Product Manufacturing
4. Grassp Ventures, LLC (#MD1262), Marijuana Delivery Operator





5. Greener Leaf, Inc. (#MR281790), Retail
6. R and R Ventures, LLC (#MB281504), Microbusiness (Cultivation and Product Manufacturing Operations)
7. The Holistic Concepts, Inc. (#MR283012), Retail
8. Tree Market Lynn, LLC (#MR282587), Retail
9. Underground Legacy Social Club, LLC (#MR284914), Retail
- X. Staff Recommendations on Responsible Vendor Training
  1. 420 Trainers LLC (#DCCN462255)
  2. Bright Buds Training (#DCCN462226)
- XI. Staff Recommendations on Responsible Vendor Training Renewals
  1. MACCTI, LLC (#RVR453145)
- XII. Commission Discussion and Votes
  1. Acting Executive Director / Commission Check-In
  2. Bulletin – Safe and Sanitary Requirements for the Processing of Marijuana
- XIII. New Business Not Anticipated at the Time of Posting
- XIV. Next Meeting Date
- XV. Adjournment

\*Closed captioning available





CANNABIS CONTROL COMMISSION

**September 19, 2023**  
**9:00 AM**

**In-Person and Remote via [Microsoft Teams Live\\*](#)**

PUBLIC MEETING MINUTES

**Documents:**

- Letter from the Massachusetts Municipal Association

**In Attendance:**

- Acting Chair Ava Callender Concepcion
- Commissioner Nurys Z. Camargo
- Commissioner Kimberly Roy
- Commissioner Bruce Stebbins

**Minutes:**

1) Call to Order

- The Acting Chair recognized a quorum and called the meeting to order.
- The Acting Chair gave notice that the meeting is being recorded.
- The Acting Chair gave an overview of the agenda.

2) Commissioners' Comments & Updates – 00:01:07

- Commissioner Stebbins expressed his appreciation for great dialogue conversation in the last meeting and the great work of their team with supporting them in this process.
- Commissioner Roy voiced her excitement to tackle extremely important topics as well as thanked the whole team, including Enforcement Counsel Rebecca Lopez (EC Lopez) and Director of Licensing Kyle Potvin (DOL Potvin).
- Commissioner Camargo agreed and stated she is looking forward to getting to work.
- The Acting Chair (AC) thanked her colleagues for trusting her in this process and noted the significance of this moment and thanked everyone involved.

3) Commission Discussion and Votes – 00:03:53





## 1. Draft Adult Use and Medical Use of Marijuana Regulations

- The AC asked Associate General Counsel Michael Baker (AGC Baker) to introduce the section on Host Community Agreements (HCAs).
  - AGC Baker directed the body to the section.
- The AC read a provision that obligates a marijuana establishment to set aside money in any escrow, bond, or any similar account for host communities use or purposes.
  - Commissioner Roy asked if the wording should be reasserted to add additional language including but not limited to all contractual vehicles.
  - Commissioner Camargo asked Commissioner Roy to refresh their memory and clarify what she meant by vehicles.
  - Commissioner Roy clarified that contractual vehicle is executed between municipalities and parties and added that it had been brought to her attention countless times that contractual vehicle MOUs (Memorandum of Understanding) and MOAs (Memorandum of Assurance) were being executed.
- Commissioner Camargo asked Commissioner Roy if she wanted to add another number to the section.
  - Commissioner Roy stated that she wanted to lift the direct language from Chapter 180 and add additional language.
  - The AC asked Commissioner Roy to restate her suggestion.
  - Commissioner Roy answered that she would type it out in the chat for the body's review.
- EC Lopez suggested putting another section under subsection I which is prohibitions.
  - Commissioner Roy agreed.
  - Commissioner Stebbins agreed with the suggestion but questioned the wording.
  - Commissioner Camargo agreed that the subsection would make sense.
  - The AC also agreed.
- AGC Baker directed everyone to the next subsection and read it out loud to the body.
  - The AC noted they have received a lot of comments regarding the date listed and asked DOL Potvin for his insight.
  - DOL Potvin stated that the HCA Working Group carefully considered the date and put significant thought into it. He also emphasized the importance of ensuring that not only marijuana establishments and licensed applicants, but also municipalities are aware of the rules once the regulations are promulgated. He noted that a grace period would allow for potential adjustments to existing HCAs and ensure compliance.
  - The AC addressed the need to clarify expectations for adherence to the law. She also noted that providing this clarification would help ensure that the specified date did not imply the Commission was requesting fully compliant HCAs.
  - DOL Potvin interjected to provide clarification that the May 1, 2024, date pertained to the Commission's enforcement of the regulations concerning





- participants of marijuana establishments and licensed applicants.
- Commissioner Camargo asked DOL Potvin to clarify when the internal review would start.
  - DOL Potvin noted there were several moving parts not only in investigations and enforcement and that the May 1, 2024, date is based on input from the working group.
  - Commissioner Camargo asked a follow-up question regarding a look back date.
  - DOL Potvin stated to his recollection that in the draft regulations there is nothing to address that look back and provided her with a hypothetical.
  - The AC added that all HCAs will eventually be reviewed due to the renewal process.
  - Commissioner Roy inquired with DOL Potvin if there was a possibility to initiate a look back process while still allowing sufficient time for all parties involved.
  - DOL Potvin stated that the look back period would be indefinite.
  - The AC asked to table the topic for discussion until they get to the appropriate section.
- Commissioner Camargo expressed the importance of finding a balance between the internal team, municipalities, and the industry when addressing the issue.
  - Commissioner Stebbins noted his appreciation for the discussion and asked DOL Potvin how the host community, licensed applicant, and marijuana establishment viewed the renewal process.
    - DOL Potvin noted that he heard inquiries and that there was not a one-size fits all perspective. He commented about two big buckets of opinions.
    - The AC asked DOL Potvin for a hypothetical regarding the renewal process.
    - DOL Potvin gave a scenario and noted that it could be discussed further with the Chief of Investigations and Enforcement and Director of Investigations.
    - Commissioner Camargo noted the need for clear communications and asked a clarifying question.
    - The AC clarified.
  - Commissioner Camargo inquired about the possibility of advancing the May date and suggested exploring interim measures that would be considerate of all parties involved.
  - The AC mentioned that there is a process that must happen before those fees can be collected.
  - DOL Potvin noted he understood what Commissioner Camargo stated and added there is a possibility that it will not be consistent if rushed.
    - EC Lopez noted it is important to keep in mind the date is for all of us regarding what the complaint future is going to look like.
  - Commissioner Roy asked DOL Potvin how many days in advance should a renewal be submitted to the Commission.
    - DOL Potvin answered that the requirement right now is at least 60 days prior but as discussed at the September 18, 2023, public meeting, the timeline was





- modified to 90 days.
  - Commissioner Roy gave DOL Potvin a hypothetical and asked about possibilities.
  - DOL Potvin clarified and explained with another hypothetical.
- EC Lopez took a moment to let the Commissioners know that they received public comment regarding whether HCAs must be submitted as part of a renewal application. She added that the public comment stated in the language says that the Commission shall review and approve each host community as part of the complete marijuana establishment or medical marijuana treatment centers license application and at every renewal.
  - Acting General Counsel Carter (AGC Carter) added that his analysis was the same and the renewal process does not need to be folded into the HCA review. He noted that this is a policy consideration for the body.
- Commissioner Stebbins asked a clarifying question with a scenario.
  - EC Lopez clarified what the public comment spoke of.
- Commissioner Roy noted Chapter 180 is not in alignment with processes at the Commission due to them not reviewing final licenses.
- DOL Potvin sought clarification from EC Lopez and AGC Carter regarding the requirement of assessing HCAs in license applications, but not necessarily in a renewal application. He highlighted the statutory obligation to review and approve the HCA at each license renewal. He elaborated that instead of mandating the HCA assessment in the renewal application, proposed a separate and distinct process for conducting the assessment annually.
  - EC Lopez noted it could be a separate review process.
  - The AC asked for clarity to make sure she understood correctly.
  - EC Lopez emphasized that policy is a matter that would need to be developed by the body, but in terms of the law it supports, if the Commissioners wanted to explore policy development.
  - AGC Baker provided a hypothetical.
- Commissioner Camargo asked what this does for the May 1<sup>st</sup> date regarding what needs to be in place as where they are right now.
  - The AC asked if this is something that needs to be drafted in the regulations or something separate and aside from the regulations.
  - AGC Carter noted how the Commission interprets their regulations.
  - DOL Potvin noted the above interpretations and asked to clarify what they are referencing.
  - EC Lopez clarified for the group.
  - DOL Potvin read aloud the information and stated he believed there is a conflict due to wording.

Commissioner Camargo moved to take a seven-minute recess.

- Commissioner Roy seconded the motion.





- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion - Yes
- The Commission unanimously approved taking a seven-minute recess, returning at 10:25AM (01:17:08).
- AGC Baker led the body to where they left off prior to the break.
- Commissioner Camargo asked if an earlier implantation date for community impact fees conflict with the May 1<sup>st</sup> HCA review date.
  - DOL Potvin answered that he is not positive, and the Commissioners should circle back to that question when they get to the later section.
- Commissioner Roy mentioned two scenarios to either bifurcate the process or slide it before May 1<sup>st</sup> to an earlier date and asked which one would be less burdensome on staff.
  - DOL Potvin answered that he believes both have their issues and they both suffer but the May 1<sup>st</sup> date is recommended by the working group.
  - The AC recommended to take a step back because they were addressing two different concerns at once and to resolve the date first.
  - Commissioner Stebbins noted that he was comfortable with the May 1<sup>st</sup> date and noted his concerns about muddying the process.
  - The AC agreed and thanked DOL Potvin for explaining what went into the thought process of the May date. She acknowledged that it is important to signal to the industry that renewals will not be contingent on the Cannabis Control Commission's HCA approval.
  - DOL Potvin understood the concern regarding non-compliant HCAs.
  - The AC asked Commissioner Roy her opinion on the date.
  - Commissioner Roy asked anecdotally about expiration date.
  - DOL Potvin noted anecdotally it was not a one size fits all.
- Commissioner Roy noted according to the statute the purpose of an HCA is to establish conditions in which the marijuana establishment operates within a community. She expressed her opinion to change the date to January 1, 2024.
  - DOL Potvin emphasized that the motivation is not selfishly limited to Licensing or to Investigations and Enforcement. He stated that the purpose is to benefit the industry and municipalities and provide a clear understanding of the playing field and time to adapt.
  - Commissioner Roy thanked him for the clarity and noted her intention to be respectful of staff.
  - AGC Carter noted the Commission's authority to impose conditions on licenses and expressed the possibility of exploring this avenue.
  - Commissioner Stebbins sought clarification from AGC Carter regarding his suggestion concerning the bifurcated process and the Commission's power to impose conditions licenses.





- AGC Carter clarified.
  - EC Lopez gave a scenario regarding the possible process of a bifurcated review.
- Commissioner Roy inquired with the Commissioners whether they would approve a renewal without an HCA. She questioned whether such a renewal would be considered incomplete, and if it would fall within the statutory responsibilities of Commissioners to review, certify, and approve.
  - EC Lopez noted at the point of renewal, the Commission will have approved or will have reviewed and made a determination on the HCA under the established process within the regulations. She questioned whether or not they would proceed with denying a renewal application because the HCA conversation has not been finished.
- Commissioner Roy asked a follow up question regarding the statute asking about the word Commission.
  - AGC Carter answered that the review does fall within the body, which is the process EC Lopez outlined, and that all final decisions would fall on the Commission.
- Commissioner Stebbins stated that he did not think they should leave an existing Marijuana Establishment or Marijuana Treatment Center waiting at the time of renewal. He questioned if it can legally operate because the HCA review and compliance has not been completed.
  - DOL Potvin agreed with Commissioner Stebbins as they are trying to find the equitable solution for people and businesses found in this position. He also added that the policy goal should take precedence.
- Commissioner Roy asked DOL Potvin to clarify that even if they were to bifurcate, would the business still have to wait to have it together at once before booking to review a renewal.
  - EC Lopez explained the process and gave an overview.
  - Commissioner Roy thanked her for the clarification.
- AGC Carter provided historical context regarding the conditions.
- Commissioner Camargo asked about the short-term and long-term impact the process will have.
- The AC noted they did not have consensus on the date just yet.
  - Commissioner Camargo stated that she is not good with the date but understood why the working group put that date together and the argument in terms of being prepared.
  - AGC Carter voiced that Commissioner Camargo's point indicate the beginning of a new process that will require education and change. He conveyed his confidence in the group's capacity to learn and adapt, and mentioned that, if necessary, the Commission has the ability to modify policy in the future.
- Commissioner Camargo asked if the group felt comfortable having a discussion regarding the long-term and short-term impacts of the bifurcated process.
  - The AC noted she did not believe they would come to a resolution today.





- Commissioner Stebbins voiced that he did not want to come back to this and did not want to change this due to making it sloppy and confusing.
  - DOL Potvin added that the bifurcated process could be a significant issue on compliance monitoring.
- AGC Carter asked whether a member of the body would like to make a motion relative to the May 1<sup>st</sup> date. He indicated they could take a vote to include the language or remove it.
  - Commissioner Stebbins suggested to wait for a final version of all the changes to go through and vote on sections individually.
  - The AC noted her hesitation regarding time constraints.
  - Commissioner Stebbins expressed his reluctance highlighting that discussions on other items within the regulations may have an impact.
  - The AC suggested finding a balanced approach by continuing to work through the HCA section and identifying areas where consensus is lacking.
  - Commissioner Stebbins expressed his desire to be mindful of statutory obligations. He noted the need to have a vote on the entire package for final promulgation.
  - AGC Carter acknowledged Commissioner Stebbins' statement and affirmed its validity in relation to the presentation of filing forms. He noted the presentation of filing forms would occur subsequent to the discussions on policy matters. He proposed that once the policy discussions were concluded that the focus could then shift to addressing the mechanics of the filing regulations.
  - The AC asked Commissioner Stebbins to restate his suggestion for clarity.
  - Commissioner Stebbins suggested individual votes on groupings of regulations.
  - The AC restated what Commissioner Stebbins suggested and asked if she was understanding correctly.
- Commissioner Roy raised a question regarding the process of voting when operating by consensus. She inquired whether a vote would be conducted if there were disagreement among the board.
  - The AC noted if everyone understands the context and if they land in different places then they will take a vote.
- Commissioner Roy asked what happens in a situation of deadlock.
  - AGC Carter suggested how the body would operate related to the process.
- Commissioner Roy inquired whether a vote would be conducted on the topic of HCAs and Community Impact Fees (CIFs) once the deliberative process is concluded.
  - The AC stated that it goes into the final vote for the entire package.
  - Commissioner Roy voiced her concern regarding the final vote and the course of action if the Commissioners disagree with a certain section.
  - The AC stated in that case they could put a motion and the body would vote on it.
  - Commissioner Camargo proposed a motion to determine a specific date.





- Commissioner Stebbins thanked his colleagues for their thoughts and noted the mutual idea where they agree and where they do not.
  - Commissioner Camargo noted she wants to be transparent about not putting a motion on the table, but she wants to continue to go through the process and hear more.
  - The AC agreed with both points.
  - Commissioner Camargo noted the importance of this process.
- AGC Baker redirected the body to two of EC Lopez's comments and noted the need to get consensus before moving forward.
  - The AC noted a consensus.
  - Commissioner Stebbins added that they all agreed on the language as well.
- EC Lopez thanked AGC Baker for identifying the language and keeping the Commission on track. She also asked a clarifying question whether the new language being a new subsection.
  - AGC Baker agreed with the new subsection and directed the body to it.
  - EC Lopez helped direct the body to where the new subsection would be.
  - AGC Baker asked if there was a consensus.
  - The AC noted a consensus.
- AGC Baker read aloud subsection three and went through the language.
  - Commissioner Stebbins noted his worry about one of the sections and stated that he believed the Commission received a significant amount of testimony on the issue. He also stated he did not want to put licensees in limbo and wanted to reward good behavior within the regulations.
  - Commissioner Camargo agreed and discussed her concern as well. She also recommended to strike the language completely.
  - Commissioner Roy agreed as well to strike it all together and read language to propose that she lifted from the Office of the Comptroller that could be better.
- EC Lopez mentioned that two different policy conversations were happening and the body needed to figure out both.
  - Commissioner Stebbins voiced the Commissioner's choice to determine what is put in the determination.
  - The AC agreed and noted a consensus to remove the language. She also asked Commissioner Roy if she wanted to offer the language she previously stated.
  - Commissioner Roy advocated that they adopt the language or a version of it.
  - The AC requested to table the topic for future conversation.
- AGC Baker read out loud the next section to the body.
  - Commissioner Stebbins noted his desire to make sure the language doesn't cause conflict or tension.
- AGC Baker moved on to read the next section.
  - Commissioner Camargo shared her opinion and concerns on the process of discontinuing.
  - The AC reminded the body that the subsections being discussed related to notice.
  - Commissioner Camargo asked a clarifying question regarding what comes





- before the notice.
- The AC clarified that she understood what Commissioner Camargo stated.
- EC Lopez noted the legal grounds as an agency to remove this from the notice on the basis of the language being unreasonably impracticable. She also noted possible consideration for the Commissioners.
- Commissioner Stebbins noted his level of comfort with removing both provisions.
- The AC noted the need to provide parameters around what happens should a discontinuance occur. She also stated that she liked EC Lopez's suggestions and noted this could be a good place for the language Commissioner Roy recommended.
- Commissioner Roy recommended to include in the notice that you can come into compliance by utilizing the model Host Community Agreement.
- Commissioner Camargo expressed that this section needs more conversation.
  - Commissioner Stebbins noted his willingness to draft language to make compliance with our model Host Community Agreement something that would drive efficiency and better compliance.
  - The AC asked a clarifying question regarding which section.
  - Commissioner Roy recommended everyone look at feedback during lunch.

Commissioner Stebbins moved to take a fifty-five minute recess.

- Commissioner Camargo seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved taking a fifty-five minute recess, returning at 1:00PM (03:48:36).
- The AC asked a logistical question regarding the hybrid meeting tomorrow.
  - AGC Carter stated Commissioners could participate in person or remotely, but he recommended some are on sight as the notice says hybrid.
  - The AC then noted for tomorrow's meeting everyone should plan to be in person and Thursday the meeting is virtual.
- AGC Baker repeated the page and section for the board.
  - Commissioner Stebbins read his proposed language and noted his desire to have the process become more efficient.
  - DOL Potvin noted the review of the HCA within 90 days is a statutory requirement and the Commission had a current policy around the review of applications adding this new provision could add conflicting nature.
  - Commissioner Stebbins asked what benefit of the model HCA would mean on the back end on the licensing team and the review of the HCA.





- DOL Potvin noted one of the benefits of the Model HCA is that licensees will be presumed to be compliant and that his idea could potentially prolong the process.
- Commissioner Roy asked if they bifurcated the HCA process whether it then would not get caught up in rest of the review process.
- DOL Potvin clarified that the bifurcation that was referenced earlier was for renewal applications and not new licensee applications.
- Commissioner Roy asked if the 30 days could apply to just renewals.
- DOL Potvin answered that there would be a higher probability of not meeting the deadline due to volume.
- The AC asked Commissioner Stebbins to state the issue he is addressing.
  - Commissioner Stebbins noted his goal was to make the process more efficient while trying to drive good compliance. He also explained to applicants the benefit to using the model HCA.
  - The AC thanked him for breaking it down and explaining more.
  - Commissioner Roy asked DOL Potvin if this was baked into the municipal equity section.
  - DOL Potvin explained that he understood the purpose of the policy goal raised by Commissioner Roy but argued that it could still have the same negative effect.
  - The AC asked if anyone remembered a previous conversation around a presumption that was given to the model HCA.
  - DOL Potvin stated that he remembered the conversation. He noted an additional benefit to using the model HCA was the quick review because it would appear that the parties are in agreement. He also added that in this situation if they were inclined as the Cannabis Control Commission and that proposal, he would recommend one approach to address the population of applicants with the model HCA.
  - Commissioner Stebbins voiced that would like to explore but is happy to withdraw it from where he previously suggested it be added.
- The AC clarified that the onus is not on the Cannabis Control Commission and it would be on the host community in their response to the Commission.
  - DOL Potvin noted the onus is on the municipality but as a matter of policy if adopted they would be taking a proactive step to make it quicker.
  - Commissioner Stebbins asked if this would also benefit the host community by shortening the timeline.
  - DOL Potvin stated the biggest benefit is to the applicant.
  - Commissioner Stebbins noted they might want to give consideration how they make that optional for the host community instead of forcing it on them.
  - The AC asked a clarifying question regarding general applications.
  - Commissioner Stebbins stated he wants to keep the option open to fold that into social equity.
- The AC directed him to the draft regulations and asked for clarity.





- DOL Potvin noted the 60-days applies to all licensed applicants, but the working group suggested that there's an exception for Social Equity Businesses that the response time is 30-days.
- Commissioner Stebbins thanked him for that clarification and stated they could move forward.
- EC Lopez proposed language for a new subsection.
  - DOL Potvin discussed the differences between the wording deemed compliant versus presumed compliant.
  - Commissioner Roy noted they wanted to use presumed because it gives the Commission more wiggle room.
  - DOL Potvin also noted presumed would give them some latitude and one-size-fits-all is not applicable.
  - The AC expressed the importance of this comprehensive conversation.
- DOL Potvin added the statute gave the Commission the permission to create a model HCA which incentivizes compliance.
  - The AC asked Commissioners Stebbins and Camargo their thoughts.
  - Commissioner Stebbins noted he would like to use presumed due to encouraging good behavior.
  - The AC noted a consensus.
- Commissioner Roy discussed an email they received regarding the definition of good compliance standing.
  - Commissioner Stebbins agreed that she had a good point and noted how he had the question yesterday about how they define a host community being on the good compliance list.
  - DOL Potvin explained that he did not believe a definition was required.
  - Commissioner Roy asked DOL Potvin if he believes it's appropriate to put a definition in a guidance document.
  - DOL Potvin stated it is an option but he did not believe it is necessary.
  - The AC asked him if the Commission used the term in other existing regulations outside of the HCA context.
  - DOL Potvin mentioned that the term was used similarly but not exactly.
  - Commissioner Roy asked if language could be proposed regarding a definition.
  - DOL Potvin noted the option and explained it is the body's choice whether to adopt the definition.
  - EC Lopez added this is a policy decision for the Commissioners and she was willing to work with legal to identify language or assist.
  - The AC asked legal if they could provide their opinion on if this definition is necessary.
  - AGC Carter noted it is not necessary but if the board wishes to further clarify then they could and would need to capitalize the term throughout the document.
  - The AC noted she believed this could limit the board.
  - Commissioner Camargo stated she did not see a need right now.





- Commissioner Roy believed it was unfair to the municipalities.
- The AC noted municipalities are in good standing until they do something this is not in compliance in the regulation list of things prohibited.
- EC Lopez noted the municipalities have been given the understanding when they are at risk of losing their compliance.
- Commissioner Camargo asked a clarifying question regarding the language.
- EC Lopez clarified.
- The AC noted a consensus on the language and placement.
- Commissioner Roy asked a clarifying question regarding striking the language.
  - EC Lopez mentioned the option for Commissioners to strike the language or explore the matter further.
  - The AC noted a consensus to strike subsections (d) and (e) (4:40:10).
- Commissioner Roy explained her proposed language and that she procured it from the Office of the Comptroller.
  - DOL Potvin asked what her intent was as the result of having that as a policy.
  - Commissioner Roy noted she would want to ask the Office of the Comptroller why they have that as a policy.
  - DOL Potvin stated he understood the goal but saw a gap within goal.
  - Commissioner Roy explained that she sat down with a lot of licensees and gave a hypothetical regarding undue burden on their outdoor farms.
  - AGC Baker asked Commissioner Roy for clarification on the language.
  - Commissioner Roy answered that they could strike suspension and amendment and just leave it at termination or dissolution.
  - EC Lopez explained the obligation to engage in contractual negotiation in good faith is an implied warranty of any contract and any party has the ability to seek redress through the court system.
  - The AC noted the possibility of the language being provided in the notices that the Commission would give the establishments.
  - Commissioner Roy noted this could be stripping them of their good compliance standing and that is how it could be utilized.
  - The AC stated the Commission would be required to decide on whether contacts are entered into with good faith.
  - AGC Baker read the current drafted language.
  - Commissioner Roy restated her language for clarification.
- The AC asked for clarification regarding who is determining if it was entered into good faith.
  - DOL Potvin asked whether the dissolution of the contract or the non-renewal of the contract would be considered good or bad faith.
  - AGC Baker voiced that staff would have to make that determination.
  - DOL Potvin noted there was a delegation component here and the decision-making power could rely on the Commission.
  - The AC asked Commissioner Roy to restate her question again.
- Commissioner Roy asked DOL Potvin a question regarding surrendering of a license.





- DOL Potvin noted he did not want to conflate surrendering of a license versus the dissolution of an HCA.
- Commissioner Roy explained there was no process for the surrendering of a license in the draft regulations right now and she restated her question directing the body to the language.
- The AC paraphrased to make sure she understood.
- Commissioner Roy noted her desire to trigger a lack of good compliance standing.
- EC Lopez asked if there is a policy shift expecting mutuality in the ending of relationship and whether this made the good faith requirement necessary.
- Commissioner Roy voiced that she believed it was necessary because there was not always mutuality and that was what she is hearing from licensees. She also asked if she should make a motion due to this being extraordinarily important.
- Commissioner Stebbins voiced his concern about this section due to the worry about the discontinuance of a relationship between the Host Community and cannabis business. He believed it would be helpful to remove the language here.
- Commissioner Camargo asked a question regarding Chapter 180 and discontinuing language.
  - AGC Baker answered that there is no specific language that requires Commission action.
  - DOL Potvin stated there is a statutory requirement to have an HCA in existence to continue operation.
  - Commissioner Roy noted a possible scenario and asked if it is cause for losing good standing.
  - The AC noted it is a delicate balance that they are trying to strike and that the process is complicated. She also stated her desire to help licensees in this process and asked Commissioner Roy to clarify her request.
  - Commissioner Roy explained that she wanted a good faith provision due to uneven leverage between the parties.
  - The AC stated that she was not opposed to the language but asked about the best way to move forward.
  - DOL Potvin noted marijuana establishments may see her request for equitable relief and he understood good faith but generally if the discontinued relationship occurred, he noted the business still had the courts who could provide equitable relief.
  - Commissioner Roy asked what adequate equitable relief would be.
- AGC Baker read through the equitable relief section before the body.
  - EC Lopez noted the Commissioners had the ability to propose requirements on how the parties could end the relationship. He explained that a good faith requirement would be a challenge to prove except in the most egregious of circumstances.
  - Commissioner Stebbins noted his suggestion regarding the sections and asked





- for clarification on the intent behind a definition.
- Commissioner Camargo asked a clarifying question regarding section 4 and Commissioner Stebbins' suggestions.
  - Commissioner Stebbins restated his suggestions.
  - The AC asked whether Commissioner Stebbins meant the Commission should provide notice that the parties have an option to enter into the model HCA.
  - Commissioner Stebbins confirmed and restated his suggestions.
  - Commissioner Camargo asked about the timeline and noted the need for some language around the wind down process.
  - The AC suggested a hybrid version with Commissioners Stebbins and Roy's language but explained that the wind down procedure would need to be created. She asked Commissioner Stebbins to repeat his proposed language.
  - Commissioner Stebbins repeated his proposed language.
  - The AC offered language with both suggestions combined.
  - Commissioner Roy said she loved the proposed language and added her opinion to strike the words "amendment and suspension" and leave "termination".
  - Commissioner Stebbins asked for clarity regarding who notified the Host Community.
  - The AC noted her interpretation was the marijuana establishment would notify municipalities.
  - Commissioner Camargo reiterated her prior comment and asked for the body to not forget about including language regarding the wind down process.
  - DOL Potvin noted historical context and supported the language.
  - EC Lopez drafted new language.
  - The AC read the language out loud.
  - Commissioner Stebbins envisioned the submission of documentation around the demonstration of good faith and fair dealing. He mentioned that the provision missed the requirement on where to report.
    - Commissioner Roy stated the business would receive a receipt of notice of discontinuance and then they would submit information to the Commission.
    - The AC explained the need to be notified by the host community of the reasoning for discontinuing for writing in demonstration that it was done in good faith.
    - EC Lopez noted the difficulty in documenting good faith and added that imposing the requirement of no bad faith made sense. She explained why the burden of proof for good faith would be complicated.
    - Commissioner Roy noted in Massachusetts municipalities the burden to demonstrate good faith is easier than two-party contracts. She mentioned that host communities must be able to demonstrate that there exists a good business justification or legal necessity that would support termination.
    - Commissioner Stebbins noted the body could leave the language in the regulations despite the language's potential ineffectiveness as pointed out by EC Lopez's point.





- Commissioner Roy noted the Commission could enforce the removal of the good compliance standing and that enforcement may give a licensee grounds to sue in a court of competent jurisdiction.
- Commissioner Stebbins noted the body should be mindful of exceptions.
- EC Lopez noted it would be easier to enforce bad faith then good faith.
- The AC asked EC Lopez if she had any proposed language that would not lose the spirit of what they are trying to accomplish.
- EC Lopez stated she would put proposed language in the chat.
- AGC Baker also recommended possible language.
- EC Lopez noted she would incorporate it into the draft and that the language in chat is more workable from an enforceability standpoint.
- Commissioner Roy noted she liked good faith better.
- Commissioner Camargo noted the challenging nature of a good faith determination.
- Commissioner Stebbins stated he is fine with how the language read. He reiterated how he was looking at the provision and that he heard the other Commissioner's concerns.
- The AC asked a clarifying question regarding placement on proposed language.
  - Commissioner Stebbins voiced his recommendation.
  - EC Lopez noted a suggestion but said it is the board's decision to adopt more restrictive language.
  - Commissioner Roy disagreed and expressed that bad faith did not go far enough.
  - EC Lopez noted the Commission could define what bad faith means and the Commission had the authority to interpret the laws and regulations.
  - Commissioner Roy commented that her primary concern when meeting with so many licensees, was that they will be in action to come to the negotiation table to sit down to renegotiate or negotiate. She added that good faith would cover that but questioned if bad faith would.
  - DOL Potvin noted that he does not think every situation of dissolving a relationship or choosing not to renew is always going to be the case of bad faith. He also noted the parties freedom to contract and that there could be an implied pressure because of this language.
  - The AC read the proposed language and asked about consensus.
  - AGC Baker suggested a grammatical change.
  - Commissioner Roy said she would be in consensus if all the evidence brought forth, including the unwillingness to negotiate would be a part of the consideration for bad faith.
  - EC Lopez noted they look to the public meeting record to understand what the policy objectives were and what considerations were made during the passage of the policies.
  - The AC noted consensus.

Commissioner Stebbins moved to take a ten-minute recess.





- Commissioner Roy seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved taking a ten-minute recess, returning at 3:17PM (06:09:24).
  
- The AC voiced a different approach going forward due to time constraints.
  - Commissioner Camargo stated either way was fine with her.
  - Commissioner Roy stated she was agnostic on it.
  - Commissioner Stebbins voiced that he is happy to keep going through it as he already went through it and knew where the questions would be located.
- EC Lopez noted the legal cite in the amendment needs to be checked deferring to Baker for clarity.
  - AGC Baker noted a mistake and stated he would fix the mistake if there was consensus.
  - The AC went back and forth on the language and placement.
  - Commissioner Stebbins added his thoughts regarding the citation.
  - EC Lopez asked AGC Baker to read the citation.
  - AGC Baker clarified the placement.
  - EC Lopez suggested to add a new section to the equitable relief provisions.
- Commissioner Camargo voiced suggestions from the public regarding waiver of fees.
  - The AC asked a clarifying question about the language.
  - Commissioner Camargo voiced that she just wanted the Commissioners to review the language and think about other equitable relief that should be added.
  - Commissioner Roy asked if these fees were financially feasible for the Commission.
  - DOL Potvin stated reimbursements and refunding fees would impact the Commissioner's ability to comply with the ability to remain neutral. He added that budgeting might cause restrictions.
  - Commissioner Roy agreed and stated the Commission did not have a checkbook where they can issue grants. She asked about reduction in some fees.
- DOL Potvin stated the equitable relief options were tailored to the situation where they do not have an HCA. He added that a reduction does not fix problem.
  - Commissioner Camargo noted the public comment and asked how to define other equitable relief.
  - EC Lopez commented that the body should determine what equitable relief could look like based on a scenario in which a host community had discontinued operations or both parties agreed to end operations.





- Commissioner Camargo explained that this option gave the body room to pick and choose if possible.
  - The AC asked Commissioner Camargo if she would like to adopt the language.
  - Commissioner Camargo noted that some is not realistic. She explained the point was to have the conversation and to think through options.
- Commissioner Stebbins noted the importance of the section that reads “other equitable relief is determined by the Commission” due to it putting forth a message that they will do their best on that license. He also noted their cooperative help with any license, marijuana establishment, or marijuana treatment center.
  - EC Lopez read 5C with her edits.
- The AC noted a consensus on the language.
- AGC Baker read the next section to the room.
  - Commissioner Stebbins noted the section needed to be numbered correctly.
  - Commissioner Roy noted feedback they received regarding complaints and stated that all complaints are taken seriously by the Commission.
  - The AC asked what that changed.
  - EC Lopez noted the complaints process and whether the language was consistent with discretion that they hold.
  - Commissioner Roy noted in previous public meetings the Executive Director (ED) had said we take all complaints to reconcile the two from the public statement to the regulations.
  - EC Lopez stated that she wanted the public to understand the staff in the Commission’s investigations and enforcement department take their responsibilities very seriously when it comes to effectively monitoring compliance and noted the difference between an investigation versus inquiry.
- The AC recalled a comment the body received regarding an interested person and asked who had the ability to file a complaint.
  - EC Lopez noted the choice of using “an interested person” was meant to invite anyone who has information or knowledge of regulatory violation to be able to submit a complaint rather than restricting complaints to just licensees.
- Commissioner Roy noted feedback they received today.
  - DOL Potvin stated this could be discussed at a later time and the AC agreed.
  - Commissioner Roy asked if the letter she was referring to could be put into the minutes.
  - The AC asked Commissioner Roy to restate her comment regarding the Massachusetts Municipal Association letter.
  - Commissioner Roy noted her concern that she previously mentioned.
- EC Lopez noted she is not sure the Commission is the proper authority to advise the municipality on how they should allocate or appropriate a fine.
  - Commissioner Stebbins proposed to remove the language regarding publication of a host community’s lack of good compliance due to more work on their end. He added that he is uncomfortable with a governmental entity doing that to other governmental entities.





- Commissioner Roy explained that planting a flag in a municipality having this information was helpful for businesses because it would help identify municipalities that are good partners and explained her reasoning.
- The AC agreed that is correct.
- Commissioner Camargo noted the public shame list and that she understood the concept but agrees with Commissioner Stebbins. She also added the need to define good standing internally and operationally.
- DOL Potvin noted these policies will need processes that are built and implemented afterwards and once the final rules are promulgated. He explained the process.
- Commissioner Stebbins noted he would like to strike the language as there are other opportunities for them to achieve the same goal.
- The AC clarified what Commissioner Stebbins asked.
- Commissioner Stebbins clarified that he needed a better sense for why this was included and its intentions.
- The AC voiced what they were thinking.
- Commissioner Roy noted another way to look at the provision was that it recognized the good municipalities to partner with for businesses.
- Commissioner Stebbins appreciated the clarification and noted what he wanted to ingrain into regulations.
- Commissioner Roy commented what she thought should be recognized regarding notifying communities and the public.
- Commissioner Stebbins offered new language and moved to amend letter C.
  - Commissioner Camargo voiced that the positive of this would be to know that communities are in compliance and that she would be happy to amend the language but noted caution due to the possibility of it getting muddy in the future.
  - The AC noted this could not go into effect until they have enough HCAs that they must review to make a designation and determination.
- Commissioner Stebbins moved to amend letter C.
- Commissioner Roy seconded the motion.
- The AC took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved the motion to amend letter C, by a vote of four in favor and zero opposed.
- AGC Baker noted an area to revisit to gain consensus and he read language.
  - The AC noted a consensus.
- EC Lopez wanted to confirm what the options were that the HCA determination notice will be providing to the parties.





- The AC asked Commissioner Roy if the suggestion to use the language in its entirety is to institute a wind down process.
- Commissioner Roy confirmed.
- Commissioner Camargo asked if there is anything to add regarding time.
- DOL Potvin told Commissioner Camargo he believed it was already tied into the 90-day requirement so that time frame had already been established.
- The AC asked if there were any questions or comments and if they wanted to include the language in the draft.
- Commissioner Stebbins voiced that he was interested in the language but questioned where it belonged and in which section.
- EC Lopez noted what the Commission could do if the language was adopted.
- Commissioner Stebbins stated he was much more comfortable with that suggestion.
- Commissioner Roy voiced that she was not as comfortable.
- Commissioner Stebbins noted he liked the mutual agreement between both parties and preferred to not see the relationship be under the HCA determination notice.
- DOL Potvin suggested softer language.
- Commissioner Roy noted a scenario regarding the licensee walking away from the municipalities and if they are entitled to equitable relief.
- AGC Baker noted they could go through the courts to argue against actions by the business.
- DOL Potvin explained this language could provoke problems.
- Commissioner Roy noted she wanted to explore the other side of the equation and make sure the body did not miss anything.
- The AC asked if it goes beyond the requirement of mutual agreement before a party can step away from the contractual relationship.
- EC Lopez noted that the agreement does not need to be executed before they step away but before they request equitable relief on the basis of the relationship being over.
- Commissioner Stebbins voiced that he liked the new language and the suggestion of the placement but saw it being outside of the bounds of what they would be sending out in an HCA determination.
- The AC noted a concern regarding the draft that marijuana establishments cannot request equitable relief unless they have a mutual agreement.
  - EC Lopez noted if the host community ends the relationship, or if both parties do, then the marijuana establishment could seek equitable relief.
  - The AC stated she did not understand the utility or why it would be included.
  - EC Lopez noted the original thought behind the provision was to discourage the situation of a host community walking away.
  - The AC noted her indifference due to not seeing the value in the provision.
  - Commissioner Stebbins noted the way he saw the issue was that it could open the door for the marijuana establishments to seek equitable relief and offered a scenario.





- Commissioner Roy voiced the utility of the language.
- Commissioner Camargo noted it provided protection in the wind down process.
- Commissioner Stebbins voiced he is comfortable with the new language and the suggestion to move it to the equitable relief section.
- EC Lopez read aloud what the section would read with the new language and noted if how the process would go without mutual abrogation.
- The AC noted it made sense to her and she was fine with the placement of the language. She noted a consensus.
- AGC Baker read the next section regarding CIFs.
  - Commissioner Roy mentioned a definition that the working group came up with regarding enhanced need.
  - The AC read Chapter 180 out loud regarding CIFs.
  - Commissioner Roy noted the term enhanced need is incompatible with the existing definition.
  - Commissioner Stebbins suggested having it be a standalone.
  - The AC noted a consensus.
  - Commissioner Stebbins read aloud the new standalone number.
- AGC Baker moved to the next section.
  - Commissioner Roy read the letter regarding the draft regulations process and directed Director Potvin to the language.
  - AGC Carter mentioned the option for Commissioner Roy to receive legal advice confidentiality if she preferred.
  - Commissioner Roy noted she wanted to be fair while listening to the concerns of the municipalities.
  - AGC Carter noted the transparency obligations might satisfy some of the concerns that have been identified.
  - Commissioner Stebbins explained it must start with a detailed invoice and how he wanted the language to appear.
- AGC Baker read the next section.
  - Commissioner Camargo asked if operators could submit arguments as to why the asserted CIF is not reasonably related to the actual costs.
  - The AC noted this concern was accounted for in another section.
- Commissioner Stebbins asked a question regarding the timeframe for the marijuana establishment pertaining to the Department of Revenue's comments and suggestions.
  - DOL Potvin explained the timeline and how they came to allow licensees more time. He noted the option to pay CIFs in installments.
  - The AC read the recommendation regarding the language and asked DOL Potvin his thoughts on changing the timeline.
  - DOL Potvin answered that the rationale provided does seem reasonable and reasonable internally too.
  - Commissioner Roy asked a clarifying question.
  - DOL Potvin clarified for Commissioner Roy.





- Commissioner Stebbins voiced that this change is helpful in a bigger and broader perspective and mentioned the importance of healthy relationships between host communities and marijuana establishments. He also brought to the body's attention that there was a typo in the proposed language.
- The Acting Chair noted a consensus to change the language regarding timeline.
- EC Lopez directed them to the proposed language in the chat.
- The AC read the proposed language out loud and noted a consensus.

Commissioner Stebbins moved to take a five-minute recess.

- Commissioner Camargo seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved taking a five-minute recess, returning at 5:18PM (08:07:59).
- The AC suggested it be a good time to put a pin into things and to come back next meeting clear. She also stated they will pick up at prohibitive practice and the goal will be to conclude HCAs and that included circling back to the date and language then they will go into municipal equity. She commented that Thursday the body could go into agent suitability and ending the discussion with a final vote on the regulations.

#### 4) Next Meeting Date– 08:14:52

- The AC noted the next meeting would be on September 20, 2023.
- Commissioner Camargo asked about the location and time.
- The AC clarified they will be remote and the meeting will go until whatever time is necessary.
- Commissioner Camargo stated she wanted to bring back the equity participant definition and introduce it while bringing up other topics she wants to speak about tomorrow.
- Commissioner Roy added closing thoughts and thanked all her colleagues.
- The AC asked AGC Carter to clarify the start time for tomorrow's meeting.
- AGC Carter clarified the meeting time for Wednesday, September 20<sup>th</sup> would be at 9:00 AM.

#### 5) Adjournment – 08:15:56

- Commissioner Stebbins moved to adjourn.





- Commissioner Camargo seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved the motion to adjourn.





CANNABIS CONTROL COMMISSION

**September 21, 2023**  
**9:30 AM**

**Via Remote Participation via [Microsoft Teams Live\\*](#)**

PUBLIC MEETING MINUTES

**Documents:**

- [Meeting Packet](#)
- Letter from Massachusetts Municipal Association
- Email from Kevin Gilnack from Mass EON

**In Attendance:**

- Commissioner Nurys Z. Camargo
- Commissioner Kimberly Roy
- Commissioner Bruce Stebbins
- Acting Chair Ava Callender Concepcion

**Minutes:**

1) Call to Order

- The Acting Chair recognized a quorum and called the meeting to order.
- The Acting Chair gave notice that the meeting is being recorded.
- The Acting Chair gave an overview of the agenda.

2) Commission Discussion and Votes – 00:01:06

1. Designation of Acting Chairperson

- The Acting Chair reminded the commissioners of Chair Shannon O'Brien's suspension and noted that as a result of the suspension, the Chair was legally unable to exercise the powers of her office, which included designating an Acting Chair. The Acting Chair emphasized that since the commission had not adopted a Governance Charter, the decision to appoint an Acting Chair rested with the entire body. She also reminded Commissioners that Monday's vote to designate an Acting Chair was not properly noticed and emphasized the importance of taking action to affirm that vote. She encouraged and emphasized the importance of transparent, honest and respectful discussion among the Commissioners.





- Commissioner Stebbins expressed willingness to make the same motion he made on Monday which designated the Acting Chair to continue serving during the regulatory process. He sought input from Acting General Counsel, Andrew Carter (AGC Carter) on the appropriateness of his proposal.
  - AGC Carter suggested two separate motions: one that would affirm Monday's votes and another that would address the closure of the regulatory process.
  - The Acting Chair sought clarification from AGC Carter on what closing out of the regulatory process entailed.
  - AGC Carter deferred to Commissioner Stebbins to explain his motion.
  - Commissioner Stebbins clarified the intent of his motion would be to designate Commissioner Concepcion as Acting Chair to guide the Commission through the regulatory review period. He sought AGC Carter's preference on the matter.
  - AGC Carter clarified that Commissioner Stebbins' previous motion was sufficient for the current purposes.
- Commissioner Roy requested Commissioner Stebbins repeat the motion language for clarity.
  - Commissioner Stebbins proposed a motion to affirm the vote made on September 18th, 2023, which designated Commissioner Concepcion as Acting Chair for the final regulations review period.
  - Commissioner Roy sought clarification on the duration of the motion if passed.
  - Commissioner Stebbins explained that the regulatory review period would end when the Commission took a final vote on the current redline draft regulations.
- Commissioner Camargo suggested reaffirming the same motion made on Monday to maintain clarity and legality.
  - The Acting Chair acknowledged the need to reaffirm Monday's motion. She emphasized the importance of deciding the next steps collectively among the four Commissioners in the best interest of the agency.
- Commissioner Roy sought clarification on whether the end point of the motion aligned with conclusion of the vote or the promulgation date.
  - The Acting Chair acknowledged Commissioner Roy's question and suggested focusing on the current situation first. She requested Commissioner Stebbins to repeat the motion from Monday for the record and subsequent voting. She expressed the need to have a conversation about the current day's proceedings and the formulation of a motion.
- Commissioner Roy inquired about the necessity of reaffirming the motion.
  - AGC Carter explained that the vote on Monday was not noticed, and reaffirming it ensures compliance with the Open Meeting Law and prevents any future challenges to the decision.
  - Commissioner Roy sought clarification whether the previous vote had not been conducted properly.





- AGC Carter clarified that reaffirmation was necessary to close the loop and ensure compliance with the Open Meeting Law. He explained that the initial vote was not noticed as it was new business at the time of posting.
  - Commissioner Roy sought clarification on how the loop was not closed.
  - AGC Carter explained that the loop was not closed because the votes were not anticipated and therefore not included in new business at the time of posting. He noted that in consideration of the Board's diligent work on finalizing the regulations, reaffirming the motion would ensure that all procedures had been followed correctly and avoid any potential challenges.
- Commissioner Stebbins sought clarification that his new motion was sufficient to reflect Monday's motion.
  - AGC Carter suggested moving to affirm the vote made on Monday, September 18, 2023, and reread the motion for the record.
  - Commissioner Stebbins moved to affirm September 18, 2023's vote designating Commissioner Concepcion as Acting Chair for the final regulations review period.
  - The Acting Chair seconded the motion.
  - The Acting Chair took a roll call vote:
    - Commissioner Camargo – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Acting Chair Concepcion – Yes
  - The Commission unanimously approved the motion to designate Commissioner Concepcion as Acting Chair for the final regulations review period.
- Commissioner Camargo motioned to designate Commissioner Concepcion as Acting Chair until the completion of the regulatory process for Chapter 180. She explained her reasoning behind the motion.
- Commissioner Roy questioned whether Commissioner Camargo's motion implied that Commissioner Concepcion would serve as Acting Chair until November 9<sup>th</sup>. She raised concern of whether Social Consumption was also included in the motion.
  - Commissioner Camargo clarified that the motion did not include language for Social Consumption.
- Commissioner Roy expressed opposition to the motion and stated her desire for a debate during the next public meeting for the selection of an Acting Chair. She raised concerns about Chair O'Brien's status, the legality of her suspension, and a delegation memo received on September 13, 2023, that delegated authority to her as Acting Chair in the Chair's absence. She emphasized the need for a robust discussion at the next public meeting on October 12<sup>th</sup> and suggested focusing on the day's agenda.
  - Commissioner Camargo raised a point of order and highlighted the need to have the motion seconded before engaging in a discussion. She acknowledged the time constraints and reiterated her motion.





- Commissioner Stebbins suggested having a discussion before seconding the motion to ensure thoughtful consideration. He proposed to allow the Acting Chair to continue serving during the regulatory promulgation process until the next public meeting on October 12<sup>th</sup>.
  - Commissioner Camargo acknowledged Commissioner Stebbins suggestion and the need to strike a balance between progressing with the regulations and addressing concerns. She mentioned the possibility of withdrawing her motion or proceeding with a vote.
- Commissioner Roy sought clarification on Commissioner Stebbins' motion. She stated that all Commissioners possess the necessary skills and qualifications to chair the meeting and called for an open discussion at the next meeting.
  - Commissioner Stebbins explained that the motion was necessary as Chair O'Brien's status was uncertain. He commended the collective efforts of the Board and acknowledged the exhaustive nature of working through the regulations. He recognized the hard work of team members not visible on camera but who contribute daily to the regulatory process.
- The Acting Chair acknowledged the discomfort surrounding the conversation and emphasized the need to find a resolution to avoid repetitive discussions.
- Commissioner Stebbins stated that his suggestion aimed to facilitate the promulgation process and set the stage for the public meeting on October 12<sup>th</sup>.
- Commissioner Roy highlighted the precedent that had been established with the Secretary assuming the Chair's authority multiple times without objections. She referred to a delegation memo sent to all Commissioners before the Chair's suspension in which authority was transferred to her for the duration of the Chair's absence. She emphasized that there was a clear precedent, unanimously agreed upon, regarding the Secretary serving as the Acting Chair. She questioned why there had been disruption on Monday and suggested that if the logic was to be applied, it should also be applied to that situation.
  - Commissioner Camargo acknowledged that while everyone may have the capability to chair the meetings, not everyone may be willing to do so due to the challenging nature of the position. She emphasized the need to move forward and the importance of stability and self-governance. She acknowledged Commissioner Roy's current role as the Secretary and emphasized the need for her assistance in the coming weeks. She encouraged Commissioner Roy to propose a motion if she genuinely desired to serve as Acting Chair. She expressed the importance of focusing on the work at hand and urged for a motion to be put forward to avoid further delays.
- Commissioner Roy posed a question to AGC Carter and proceeded to read a statement into the record. She referenced a delegation memo received on September 13, 2023, from Chair Shannon O'Brien before her suspension. The memo stated that Commissioner Roy was designated to serve as the Acting Chair for the September 14<sup>th</sup> meeting and throughout the Chair's absence. Commissioner Roy sought clarification from AGC Carter on the legally binding nature of the memo.





- AGC Carter noted that due to Chair O'Brien suspension, she did not possess the legal authority to appoint an Acting Chair or exercise the powers of the office. He clarified that a change in Chair O'Brien's status would be determined by the Treasurer.
- The Acting Chair emphasized that AGC Carter had already provided an explanation on Monday regarding the extent of the Chair's legal authority during her suspension.
- Commissioner Camargo motioned to designate Commissioner Concepcion as Acting Chair until the completion of the regulatory process for Chapter 180.
- The Acting Chair seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – No
  - Commissioner Stebbins – No
  - Acting Chair Concepcion – Yes
  - The Commission voted to designate Commissioner Concepcion as Acting Chair until the completion of the regulatory process for Chapter 180 by a vote of two in favor and two opposed. The motion did not pass.
- Commissioner Stebbins proposed a motion to designate Commissioner Concepcion as Acting Chair through the meeting of the Cannabis Control Commission on November 9th.
- The Acting Chair seconded the motion.
- Commissioner Roy raised concerns regarding the motion language put forward by Commissioner Stebbins and highlighted the deviation from the originally proposed language. She requested clarification behind his modification.
  - Commissioner Stebbins conveyed his intention was to align the date with the motion proposed on Monday. He expressed appreciation for the Acting Chair's point regarding the regulatory process and the requirement to promulgate the regulations by November 9<sup>th</sup>.
- Commissioner Roy requested confirmation that the Acting Chair would open the November 9<sup>th</sup> meeting, followed by a discussion to determine an Acting Chair.
  - Commissioner Stebbins stated that the agenda for the November 9th meeting had not been determined yet and suggested utilizing the October meeting to determine the agenda for the November meeting. He also expressed hope that any uncertainties surrounding Chair O'Brien's employment would be resolved by then.
  - Commissioner Roy voiced confusion about Commissioner Stebbins' opposing vote and inquired whether he wanted it to be included on the agenda for the November 9th meeting.
  - Commissioner Stebbins expressed his desire for flexibility in determining the content of the November 9th agenda. He noted the agenda did not need to be posted until two days prior to the meeting.
- Commissioner Stebbins proposed a motion to designate Commissioner Concepcion as Acting Chair through the meeting of the Cannabis Control Commission on November 9th.





- The Acting Chair seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved the motion to designate Commissioner Concepcion as Acting Chair through the meeting of the Cannabis Control Commission on November 9th.

## 2. Draft Adult Use and Medical Use of Marijuana Regulations

- Enforcement Counsel, Rebecca Lopez (EC Lopez) read draft language pertaining to name or location change pursuant to 935 CMR 500.104(1).
- Commissioner Stebbins underscored the significance of clearly stating that an amended Host Community Agreement (HCA) would apply only to Marijuana Establishments (MEs) changing locations within the same host community, whereas a new HCA would be required for MEs relocating to a different host community.
  - Director of Licensing, Kyle Potvin (DOL Potvin) acknowledged that if an ME relocated to a new municipality, a new HCA would be necessary due to the involvement of a new contracting party. He suggested that if an ME changed locations within the same municipality, the requirement for an updated HCA would depend on any modifications made by the bodies. He recommended revising the language to align with the proposed policy.
- EC Lopez expressed willingness to provide updated language. She noted the complexity of various scenarios and the need for clarity on whether changes warrant an amended HCA. She reminded Commissioners about the waiver process for licensees to seek individual consideration based on specific circumstances.
- Commissioner Roy sought input from EC Lopez about the possibility of incorporating language in the Model HCA as an interim measure during the negotiation process.
  - EC Lopez emphasized that a submitted amended HCA would initiate a restart of the review process. She noted the need to review the HCA and ensure its compliance. She mentioned the requirement to issue a determination notice and highlighted that said determination notice would include the option for the Model HCA.
- The Acting Chair invited questions or comments. She sought consensus on the proposed amended language.
  - Commissioner Stebbins expressed agreement with the proposed language. He emphasized the need to provide clarity regarding the requirements for both marijuana establishments and host communities when relocating to a new host community.
- EC Lopez read the proposed amended language.
- Commissioner Stebbins suggested that one way to address the issue of having to obtain a new copy of the HCA whenever there were changes to the address, is to include a clause in the HCA that would allow for changes to be made without





- requiring a new copy.
- DOL Potvin expressed his understanding of Commissioner Stebbins' perspective and noted that staying within the same municipality could offer administrative efficiency. He provided an example where some HCAs do not include an address and indicated that in certain situations where a business moves within the same municipality, the HCA may remain unchanged. He argued that requiring an amended HCA could create an unnecessary administrative burden, as there would be no actual changes to be made. He recommended that any changes to the HCA should be submitted accordingly. He proposed the option for businesses to provide an attestation for HCAs that have remained unchanged without any modifications.
  - EC Lopez expressed disagreement with DOL Potvin on the matter. She argued that using the clause "if there are changes" in the context of HCAs could lead to confusion in cases where the HCA lacks location information. She proposed that in such situations, a waiver could be submitted to seek exemption from this requirement. She also expressed support for Commissioner Stebbins suggestion to remove the clause from the proposed language.
  - Commissioner Stebbins concurred with the proposed language and acknowledged DOL Potvin's argument that any HCA changes should be submitted. He emphasized the need to prevent unnecessary administrative burdens in cases where no changes occurred in the HCA. He concluded that the proposed language effectively addressed these concerns.
  - EC Lopez offered an amendment to the language by proposing the following wording: "a marijuana establishment that seeks a location change within the same Host Community after execution of an HCA, may be required to provide an amended HCA to the Commission." She noted that the amended language could address the scenario identified by DOL Potvin.
    - The Acting Chair agreed with the proposed language and confirmed that a consensus had been reached among the Board.
  - Commissioner Stebbins directed the Board's attention to the section of the regulations pertaining to Commission Review and Certification of Community Impact Fees (CIFs). He noted that the current wording of the section grants authority to the Commission to make a final determination on CIFs. He indicated that some of the language could be amended to reflect the goal of avoiding unnecessary regulatory processes for communities that no longer assessed a community impact fee. He believed that the proposed language would eliminate the Commission's role as arbiter and instead focus on regulations that incentivized and acknowledged positive behavior and relationships between MEs and HCAs. He concluded that the proposed language aligned with these objectives.
  - The Acting Chair inquired whether the proposed language aligned with the reasonableness standards established by Commission.





- EC Lopez explained that 94G, Section 3 in the Massachusetts General Laws pertained to Local Control. She noted that subsection D specifically addressed the legislature's expectation for parties to negotiate and execute an HCA, as well as granted authority to the host community to include a CIF. She suggested incorporating a general reference to this section to provide context and guidance.
- Commissioner Roy highlighted that the Commission had a statutory obligation to review, certify, and approve HCAs that stipulated all responsibilities. She questioned how the Commission could fulfill its due diligence without the ability to evaluate whether the impacts outlined in the HCAs were reasonably related and based on actual costs as stipulated by statute.
  - EC Lopez acknowledged that the legislature required the Commission to review the terms and responsibilities of HCAs, including the terms and responsibilities outlined within. She clarified that the CIF review process was distinct and separate from the HCA review. She noted that the legislature did not explicitly require the Commission to review each and every CIF in the same manner as HCAs. She deferred to the judgment of the Board to determine if Commissioner Stebbins' policy proposal aligned with the goals of the legislature and the Commission.
  - Commissioner Stebbins expressed appreciation for the enactment of Chapter 180 which was designed to address the treatment under the original statute and enable communities to collect funds. He stated that the legislation provided a process for the Commission to arbitrate questions regarding allowable costs and their impact on host communities and marijuana establishments. He emphasized the need for the Commission to consider the potential burden that costs claimed by host communities would have on municipalities, communities, and the Commission. He argued against the need for the Commission to review and certify the process if both parties were already in agreement. He highlighted the benefit of faster payment for municipalities and the need for host communities to accurately assess their claimed impacts.
  - Commissioner Roy expressed concern about potential disparities between entities with different resources. She stated that limiting oversight would hinder the Commission's ability to ensure compliance with the reasonable relatedness standard and could create an uneven playing field if oversight were restricted. She expressed appreciation for Commissioner Stebbins' perspective, but expressed fear that it could undermine the protections established by Chapter 180 if the Commission was unable to ascertain reasonable relatedness and actual costs.
  - Commissioner Stebbins emphasized that the proposed language is intended to provide a safeguard in the industry. He indicated that these proposed changes would not hinder the ability of smaller players to challenge imposed costs. He clarified that the intention was to encourage the continuation of positive relationships between smaller players and their host communities and municipalities. He believed that the proposed regulations would reward good behavior and avoid unnecessarily burdening the Commission with matters that





- were not being brought forward for action.
- The Acting Chair requested Commissioner Stebbins to provide a brief summary of the rationale behind his proposed language.
  - Commissioner Stebbins indicated that there was a timeline in place for host communities to submit invoices to marijuana establishments and document claimed impacts realized over the previous year of operation. He noted that the Commission would conduct a review to certify the reasonableness of the costs claimed or make a determination if the costs were deemed unreasonable.
  - The Acting Chair directed a question to EC Lopez and DOL Potvin regarding whether there were any provisions in the current regulations that would prohibit an operator from making payment prior to the Commission's review.
    - EC Lopez clarified that there was nothing in the current regulations preventing an operator from paying the CIF without disputing it. She explained that the Commission would be responsible for reviewing the fee to determine if it was reasonably related. She noted that the licensee would have the option to dispute the fee or pay it after the Commission's review. She highlighted that relinquishing oversight and determination of some CIFs would result in a lack of uniformity in enforcing the standard of reasonable relatedness. She remarked that if an invoice were to be received without dispute but contained an improper assessment of a CIF that was not reasonably related, the Commission's ability to take action could be limited since the parties would have already submitted an attestation. She emphasized that choosing to relinquish enforcement and oversight would be a policy choice that could lead to disparate standards and lack of uniformity based on the licensee and host community relationships.
    - The Acting Chair voiced concerns about the process and its potential to circumvent the Commission's reasonableness standards. She also expressed concern about payments being made before the review process, which had the potential to undermine the effectiveness of the standards.
  - Commissioner Roy questioned whether there would be an issue with the Commission issuing a notice of deficiency if, after submitting a determination notice, the Commission identified CIFs that did not align with statute and regulations.
    - EC Lopez believed that the Commission had a well-defined and detailed review process outlined in the regulations. She stated that the process entailed providing notice of the CIF determination to both the marijuana establishment and the host community. She explained that the notice offered the marijuana establishment the option to request an administrative hearing before an independent hearing officer to contest the Commission's determination. She noted that in the event the Commission agreed with the host community that the determination was reasonably related, the marijuana establishment would have the opportunity to challenge that decision. She also noted that the host community could also seek intervention to participate in the challenge. She mentioned that a licensee had the option to seek court intervention for an independent review of the impact fees, or alternatively, could choose to pay the fees.





- Commissioner Roy questioned whether it would be considered arbitrary and capricious to issue a notice of deficiency or a determination letter stating non-compliance, while technically allowing the same CIF to proceed based on the attestation.
- EC Lopez clarified that Commissioner Stebbins' proposal entailed the option of exempting parties from the review process which would eliminate the need for the Commission to make any determination on that specific CIF. She explained that by leaving the decision of whether the CIF was reasonably related to the parties involved, the Commission would reduce the risk of being challenged as arbitrary and capricious. She cautioned that there could be significant risk of introducing disparate standards regarding what was deemed reasonably related which could potentially result in arbitrary outcomes for licensees who sought CIF review through the Commission compared to those who did not.
- Commissioner Roy proposed an amendment to Commissioner Stebbins' language and expressed her willingness to withdraw the proposal if there was no consensus to adopt his language.
- Commissioner Stebbins expressed a concern regarding the establishment of an additional reasonableness standard based on agreement between a host community and a marijuana establishment. He emphasized that the reasonableness standard should solely apply to challenged invoices.
  - DOL Potvin identified a conflict between the two provisions and noted that Commissioner Roy's proposed language contradicted the policy objective of reviewing based on established criteria. He further explained that the language would still require staff to review each community impact statement and invoice. He reiterated that the two different versions together undermined the proposed objective. He highlighted the distinction between reviewing CIFs and HCAs and indicated that the proposed policy would relinquish the Commission's authority to review CIFs.
  - Commissioner Roy raised a concern about the unintended consequence of potentially relinquishing the Commission's oversight and authority. She questioned if this consequence would arise due to the requirement of attestation by the two parties, which would grant them the right of oversight and authority over the matter. She expressed concern that the Commission would no longer retain its ability to oversee and exercise authority if it relied solely on a mutual agreement between the parties.
  - DOL Potvin clarified that the authority to review CIFs was established in Chapter 180. He emphasized that the Commission is not obligated to review these fees, as it was separate and distinct from the mandated host community agreement review. In response to Commissioner Stebbins' proposal, he explained that if the parties agreed on the invoice amount for the CIF and represented it to the Commission with a mutual agreement, the Commission and staff would not review based on the established criteria in the law and regulations. He addressed Commissioner Roy's concern and stated that the language used implied giving up the Commission's authority to review,





approve and certify the CIF. He clarified that the policy, if adopted, would mean the Commission would simply not review it as part of its policy.

- Commissioner Roy raised concerns about potential arbitrary and capricious rulings by the Commission if determinations and compliance follow-ups varied for licensees with CIFs.
  - EC Lopez stated that while the risk of being challenged for arbitrary and capricious decisions seemed low, adopting a policy of abstaining from oversight in some cases could lead to arbitrary outcomes for licensees. She discussed the enforceability and legal challenges related to disparate treatment and the public accessibility of impact invoices. She also acknowledged that Commissioner Stebbins had raised a valid point earlier regarding the timing of when a licensee would pay the CIF. She questioned if this would introduce the possibility of another reasonably related standard based on the licensee's payment. She explained that the working group had not considered the scenario of a licensee paying during the 30-day window between receiving the fee from the host community and sharing the invoice with the Commission. She highlighted that the policy area of whether the licensee could pay during that window or not was still unexplored. She suggested that the Commission would need to make a policy statement regarding whether the licensee could or could not pay within the 30-day window before the Commission would assess and review CIFs.
- Commissioner Roy further questioned whether it would still be required for a licensee to transmit their community impact invoice to the Commission within a certain timeframe, as it could potentially reveal disparate treatment and potentially make the Commission vulnerable to legal challenges. She also emphasized the importance of impact invoices as public records.
  - EC Lopez informed Commissioner Roy that Commissioner Stebbins' proposal was limited to the review and certification process. She noted that the proposal stated that a host community within a marijuana establishment could be exempted from the CIF review and certification process as outlined in 935 CMR 500.184(c). EC Lopez clarified that the proposal did not seek exemption from the requirement of transmitting information between the licensee and the marijuana establishment, nor between the marijuana establishment and the Commission, as stated in 935 CMR 500.184(a).
- Commissioner Stebbins suggested allowing communities to pay an impact fee while contesting another impact fee. He highlighted that while the rules governing a marijuana establishment's ability to challenge an impact fee were still under review and awaiting a final decision, communities were allowed to pay impact fees they did not agree with. He raised a question whether the Commission would be responsible for making a decision on the contested impact fee and/or have the authority to assess the reasonableness standard of the payment being allowed when reviewing an invoice.





- The Acting Chair stated that the Commission reviews every fee, irrespective of any assertions made by either party concerning compliance. She emphasized that the Commission makes determinations on every item under consideration.
- EC Lopez confirmed the Acting Chair's comment and stated that in accordance with the existing regulatory framework, the invoices are submitted directly to the Commission. She further explained that the Commission then conducts a compliance determination and subsequently issues a copy of that determination to the parties involved.
- Commissioner Stebbins questioned whether the Commission's authority only pertained to decisions on contested matters or if it extended to contesting payments made by the establishment.
- The Acting Chair confirmed that the Commission had the authority to make a determination on the entire package of fees.
- DOL Potvin acknowledged the potential scenario of a licensee having already made a payment and provided a numerical example to illustrate the issue. He clarified that the Commission's role was limited to certifying based on its granted authority, and any reimbursement discussions would be between the licensee and the municipality. He suggested including an advisory in a guidance document to emphasize the Commission's responsibility for certifying amounts and advise licensees to wait for the Commission's certification before making payments. He expressed that while guidance documents could provide proper procedures, there remained a real possibility of such situations occurring. He noted that in such cases, it was likely that either the municipality would voluntarily reimburse the licensee or litigation would be necessary.

Commissioner Roy moved to take a five-minute recess.

- Commissioner Stebbins seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved taking a five-minute recess, returning at 11:31AM (02:02:34)
- Commissioner Stebbins sought assistance in locating language within the regulations pertaining to the payment of a CIF by marijuana establishments.
  - EC Lopez located the language in question and proceeded to read it aloud to the Board.
  - Commissioner Stebbins expressed concerns about the reasonableness standard and the potential implications of allowing marijuana establishments to pay parts of the CIF while contesting certain portions before the Commission.





- EC Lopez clarified that the regulations are designed to follow a review and certification process. She explained that the claimed CIF is the initial assessment by the host community, and it becomes properly due and payable upon certification by the Commission, unless disputed by the marijuana establishment.
- Commissioner Stebbins sought clarification on whether the payment obligation for the agreed-upon CIF comes after the review process.
- EC Lopez clarified that the Commission intentionally used the term “claimed CIF” to address what the host community asserted but had not yet been reviewed and certified by the Commission. She stated that for an impact fee to qualify as a CIF, it would need to be reasonably related. She explained that a CIF would become due and payable unless disputed by a marijuana establishment.
- Commissioner Stebbins shared his understanding of Section 7 that it pertained to a post-review scenario where a marijuana establishment agreed to pay a CIF to its host community. He emphasized that this payment is part of the overall reasonable assessment made during the review process. He raised concerns about the clarity of the process.
- EC Lopez confirmed that it is a post-review scenario and that disputes could still be pursued through the administrative hearing process or the courts.
- Commissioner Stebbins suggested adding language to clarify that the payment obligation would be subject to non-frivolous legal disputes through the Commission's hearing process or a court of competent jurisdiction. He, ultimately, chose to withdraw his proposed language to allow the discussion to move forward.
- The Board reached a consensus on the clarifying language for section eight regarding the payment of CIFs.
- AGC Baker introduced 935 CMR 500.181(1)(2) on “Minimum Acceptable Equity Standards Governing Municipalities and Host Communities”.
  - No issues were raised by the Commissioners in Subsections (1) and (2).
- AGC Baker introduced Subsection (3), “Equity Standards for Host Communities to Promote and Encourage Full Participation in the Regulator Marijuana Industry.”
  - Commissioner Camargo recommended creating a model ordinance or bylaw to ensure transparency and fair standards across municipalities.
  - EC Lopez suggested creating a guidance document rather than incorporating an ordinance or bylaw into the regulations.
  - AGC Baker expressed agreement with EC Lopez’s suggestion to create a guidance document rather than a model ordinance.
  - Commissioner Stebbins supported the idea of a model ordinance similar to the model HCA that would provide an understanding of compliance with the Commission's goals.
  - The Acting Chair expressed confusion about the term "model" and suggested simplifying the language by directly stating the desired provisions for presumption.





- Commissioner Camargo clarified that the concept was to create a supportive document through guidance for municipalities to adopt.
- Commissioner Stebbins suggested adding a new option Section 2, to the language regarding the minimum acceptable Equity standards. He explained this option would involve adopting a model ordinance or bylaw created by the Cannabis Control Commission, which would serve as a step for municipalities to meet the Commission's standards.
- Commissioner Roy raised concerns about the sustainability and geographic equity of the requirement related to participation rates from communities disproportionately affected by marijuana prohibition.
  - Commissioner Camargo explained that the language was derived from the delivery and marijuana carrier evaluation criteria already in the regulations.
  - Commissioner Roy highlighted that circumstances have changed, and the stakes were now higher. She noted that the regulations now entail the possibility of communities forfeiting all their CIFs, with a different standard in place. She stated that penalties can be imposed on communities that fail to comply. She mentioned that it is important to note that not all towns have agreed to participate.
  - The Acting Chair clarified that adopting the language was not a requirement but a way for cities to meet the minimum Equitable standards.
- Commissioner Stebbins supported incorporating Commissioner Camargo's proposed language and emphasized the importance of having the model ordinance as an option.
  - Commissioner Camargo agreed with the addition of the model ordinance and proposed adding a specific time frame of three years or until the goals of the exclusivity period have been met.
  - Commissioner Stebbins sought clarification from Commissioner Camargo on the existing language in Section 1, which stated “for an extended period of time.” He then referred to Section 2 and mentioned the possibility of the Model Ordinance or Bylaw containing different language that could potentially address a three-year period if a community chose to adopt the Commission’s model.
  - Commissioner Camargo expressed her preference for including the language, “for three years or until the goals of the exclusivity period have been met.” She emphasized the importance of its placement and believed it should be included in the regulations rather than just guidance documents. She acknowledged the need for consensus on its inclusion but stressed the significance of clearly stating this requirement. She recognized the focus on guidance but emphasized the value of having it explicitly mentioned in the regulations, even if not a requirement, as it would be presumed to ensure compliance.
  - The Acting Chair sought clarification on whether Commissioner Camargo wanted to revise Section 1 to include the proposed language while considering a separate Section 2 that would encompass the model ordinance language.
  - Commissioner Camargo agreed with that approach and presented her proposed language for both options.





- AGC Baker pointed out that the extended period of time in the revised Section 1 remained vague and suggested a potential revision.
  - Commissioner Camargo agreed with the revision and requested that the revised language be shared for review.
- Commissioner Roy inquired about the omission of data collection and reporting by municipalities.
  - Commissioner Camargo clarified that data collection was addressed in Section 2. She also mentioned the need to determine whether the goals would be included in the regulations or guidance. She also proposed adding a section on developing criteria for evaluating the goals of the exclusivity period, either as part of Section 6 or a separate section.
- The Acting Chair presented the revised wording for Section 1, and the discussion continued regarding the classification of the language.
  - Commissioner Roy sought clarification on how to classify the different elements, particularly Section 1, and requested further explanation on how communities would ascertain the information.
  - Commissioner Camargo suggested focusing on establishing the language first before addressing the operational aspects. She proposed adding goals to provide direction or guidance for the exclusivity period.
  - AGC Baker read proposed language.
- Commissioner Stebbins explained that communities would adopt their own ordinances or bylaws with stipulations that would remain in effect until the goals of the exclusivity period were met. He noted that the determination of meeting these goals would be made by each municipality. He expressed that the progress could be addressed separately as a new regulation.
- Commissioner Camargo explained that the three-year period was a good starting point, considering the time it usually takes for businesses to become profitable. However, she clarified that the three-year period was not mandatory and that longer periods were also acceptable.
- Commissioner Roy raised a question about how communities would demonstrate that the goals of exclusivity have been met.
  - Commissioner Camargo mentioned that the criteria and outlines for the goals could be part of the Equity plan developed by the host community.
  - The Chair agreed that the determination of meeting the goals should be left to the municipality, aligning with Commissioner Stebbins' earlier statement.
- Commissioner Roy emphasized the importance of data collection to demonstrate the number of social Equity businesses in a community.
  - Commissioner Camargo expressed her support for data collection and clarified that having clearer language in the regulations would facilitate this. She also mentioned the towns that are still in the process of implementing social Equity measures.
  - EC Lopez reassured the group that the proposed language would not limit what a municipality could do, as the statute would allow them to establish additional procedures and policies to promote Equity.





- Commissioner Camargo suggested adopting AGC Baker's revised draft for options Section 1 and Section 2. She also expressed her preference for including the goals in the regulations but was open to reaching a consensus on whether they should be included in the regulations or provided as guidance.
  - The Chair requested to hear the complete amended language, including the goals, to better understand its potential impact if adopted into the regulations.
- Commissioner Stebbins expressed the Commission's interest in evaluating the success of municipal efforts and discussing data reporting requirements. He encouraged revisiting the extended period of time in option Section 1 to avoid locking local municipalities into a specific timeframe.
- Commissioner Camargo mentioned incorporating evaluation criteria into the model ordinance or bylaw and agreed that some measurements could be included in guidance for more flexibility. She read the proposed language for the goals, including criteria for evaluating the accessibility period and data collection and reporting by the host community. Commissioner Camargo suggested removing the mention of the Commission and replacing it with "host community" in the language.
- Commissioner Roy raised a question regarding registered agents and how municipalities would ascertain the information and account for fluidity in job positions.
  - Commissioner Camargo acknowledged the need to consider this issue and explained that including the language was meant to provide a ballpark estimate for host communities.
  - Commissioner Roy expressed concern that crediting individuals who work in different municipalities might devalue the intended impact.
  - Commissioner Stebbins noted that the evaluation and assessment criteria discussed would be relevant for the exclusivity period for delivery operators and license categories. He suggested incorporating many of these considerations into the model bylaw or ordinance and the guidance provided. He also mentioned that some of the requirements were already addressed in the section concerning the components of a host community's plan and the data requirements.

Commissioner Stebbins moved to take a twenty-five-minute recess.

- Commissioner Camargo seconded the motion.
  - The Acting Chair took a roll call vote:
    - Commissioner Camargo – Yes
    - Commissioner Roy – Yes
    - Commissioner Stebbins – Yes
    - Acting Chair Concepcion – Yes
  - The Commission unanimously approved taking a twenty-five-minute recess, returning at 1:30PM (03:57:19)
- 
- AGC Baker guided the Board's attention to the Municipal Equity section, 935 CMR 500.181(3)(a)(1).





- Commissioner Camargo took the previous conversation into consideration and proposed an amendment to Section 1. She read the revised language as follows: "adopting the model ordinance or bylaw created by the commission to license social Equity businesses for three years or until the goals of the exclusivity period have been met." She addressed Commissioner Roy's questions about goals and data collection, suggesting that guidance could be developed after the regulations are established to assist municipalities. She reiterated that the requirement was presumed, not mandatory.
  - Commissioner Stebbins sought clarification, and confirmed that under this section, municipalities would only be presumed in compliance if they adopted the Commission's ordinance or bylaw which would eliminate the option for municipalities to create their own.
  - Commissioner Camargo affirmed that municipalities would indeed have only that option under this section to achieve presumed compliance.
  - Commissioner Stebbins expressed disagreement with Commissioner Camargo's proposed language and stated that it deviated from the process established in the HCA. He believed that communities should have the freedom to be creative and adopt their own standards, regardless of their size. While he appreciated the goal of encouraging higher standards through a model ordinance, he was hesitant to restrict municipalities like Boston or smaller communities from pursuing their own approaches. He suggested keeping option Section 1 as it was and incorporating Commissioner Camargo's language as option Section 2. He recommended reviewing subsection Section 2, which addresses the development of a host community plan, to determine if it influenced the need for options Section 1 or Section 2.
  - Commissioner Camargo read the amended language.
  - Commissioner Stebbins expressed agreement with Commissioner Camargo's amended language.
- Commissioner Roy sought clarification regarding the inclusion of options Section 1 and Section 2 in the regulations and goals being addressed in guidance.
  - Commissioner Camargo confirmed that the goals would be covered in guidance after the regulations were established.
- EC Lopez provided an amendment to remove commas around "or bylaws" to clarify that the model ordinance or bylaw would be a single document created by the Commission.
- Commissioner Roy raised a point about municipalities not licensing businesses.
  - EC Lopez clarified that the term "permitting" had been used instead of "licensing" in previous discussions.
  - The Acting Chair agreed to use the term "permitting" for consistency.
  - The Board unanimously expressed agreement with the revised language for options Section 1 and Section 2.
- AGC Baker guided the Board to the next section of the Municipal Equity portion, subsection (b).
- Commissioner Camargo sought clarification on the meaning of "local approval process" in Section 3, Section 2.





- EC Lopez explained that “local approval process” referred to a newly defined term created by the working groups.
- Commissioner Camargo suggested changing “local approval process” to “commenced operations”
- DOL Potvin provided additional information on the distinction between obtaining a final license and commencing full operations.
- The Acting Chair confirmed the proposed change, and the language was revised accordingly.
- The Board reached a consensus on the amendment.
- AGC Baker guided the Board to the next Section (c).
- Commissioner Camargo raised a question about the wording of "develop a plan" and suggested using "equity plan" to explicitly refer to the focus on equity. She also inquired about the review process for the municipality's equity plan and whether it would come before the Commission for review.
  - The Acting Chair discussed the specific review process and comparison to positive impact plans or diversity plans.
  - Commissioner Camargo expressed the need for a more active role in reviewing and improving municipalities' equity plans. She acknowledged that it would be an additional task but emphasized the importance of understanding and assessing the equity plans. She requested input from the attorneys regarding the Commission's authority to approve or disapprove host communities' positive impact plans.
  - DOL Potvin referenced a section that required host communities to adopt local rules or bylaws by a specific date and submit an attestation affirming compliance with the regulations. He highlighted the existing notification requirement and the distinction between notification and approval processes for different types of changes in license status.
  - Commissioner Camargo proposed the development of language to address the approval process and the inclusion of an Equity plan in the regulations. She emphasized the need for the Commission to have an active role in reviewing municipalities' Equity plans and suggested that simply posting them on the website would not be sufficient.
  - Commissioner Stebbins echoed the concern about the Commission's ability to review the plans and raised the possibility of relying on complaints as a way to assess plan compliance.
  - EC Lopez highlighted the Commission's pre-existing obligation to establish procedures and policies for promoting Equity participation and positive impact on communities. She suggested that the same statutory provision could be used to support the Commission's review of host communities' plans.
  - Commissioner Roy sought clarification on the specific actions the Commission would take in reviewing the plans.
  - Commissioner Camargo acknowledged the need to define the review process and noted that many towns currently lack Equity plans.
- Commissioner Roy raised concerns about licensees not meeting their diversity and positive impact goals, and the lack of enforcement mechanisms. She asked about the





implications for municipalities and whether there were any punitive measures.

- Commissioner Camargo suggested that the Commission should have the ability to review Equity plans submitted by municipalities, rather than just having them posted on the website. The discussion emphasized the need for guidance and clarity on the review process and the Commission's role in ensuring Equity needs are met.
- Commissioner Stebbins mentioned that the Commission has the authority to deny license renewals if licensees consistently fail to meet their obligations. He noted that while this action has not been taken yet due to the Commission's relative newness in the process, he believed that it is a condition that could be used as a reason for not renewing a license.
- DOL Potvin emphasized that the aim is for businesses to succeed, comply with regulations and have their licenses renewed. He mentioned that, to his knowledge, license renewals have never been denied. He cautioned against tying the municipal requirement to the licensee's renewal process and requested further clarity on the matter.
- Commissioner Stebbins expressed the need to determine where the Commission has authority and where it lacks it. He acknowledged the ability to deny license renewals if applicants fail to fulfill their obligations under positive impact or diversity plans. He emphasized the importance of not overburdening municipalities and establishing a minimum requirement that aligns with community resources. He discussed the process of adopting local rules and submitting attestations to the Commission by a specified date. He emphasized the importance of solid and well-thought-out plans and highlighted the possibility for interested parties to file complaints alleging non-compliance with Equity requirements. He noted that the Commission has the power to render judgments and impose fines on host communities if necessary. He mentioned that the goal was to address potential loopholes and ensure effective oversight and enforcement.
- DOL Potvin mentioned that the draft regulations already have compliance measures in place, including a deadline of May 1, 2024, for municipalities to comply with the section. He highlighted that host communities is a defined term and emphasized the potential impact of non-compliance, such as fines equal to the community impact fees collected from licenses. He acknowledged that Commissioner Camargo's preference for municipalities to apply and see approval for their plans but raised concerns about the additional administrative requirement it might impose. He noted that seeking approval at this point could be problematic. He remarked that regardless of the approval process, if municipalities failed to comply, the Commission would receive notifications and initiate inquiries that could potentially lead to investigations and enforcement actions as outlined in the draft regulations. He concluded that compliance measures were established to incentivize municipalities to adhere to the section's requirements.
- EC Lopez pointed out that the legislature explicitly gave the Commission the authority to hold municipalities accountable and impose penalties for non-





- compliance.
- Commissioner Camargo expressed the importance of reviewing and approving Equity plans submitted by municipalities and highlighted the Commission's power and authority in this regard. She discussed the possibility of providing guidance and feedback to municipalities to help them develop their plans and ensure compliance. She noted the importance of supporting municipalities rather than punishing them and to consider the challenges they may face in implementing Equity initiatives.
  - EC Lopez acknowledged that the compliance implementation process required preparation and time. She indicated that the new law represented a significant overhaul for municipalities, licensees and the Commission and expanded oversight powers particularly equity actions or inactions at the local level. She emphasized that it was challenging to predict the exact outcome and standards until the regulations were finalized. She explained that the draft regulations currently outlined a complaints, investigation, fines and administrative hearing process that align with the Commission's existing approach to handling such matters.
  - Commissioner Camargo posed a question about the potential for an attestation process to modify or adjust the municipality or host community's compliance with the regulations. She inquired if utilizing an attestation form or a similar mechanism could serve as a means to effect changes within the community.
    - DOL Potvin explained that the Municipal Equity section carries significant weight for ensuring compliance. He indicated that the attestation requirement which is already included in the draft regulations under Section (c), mandates that a host community submit an attestation affirming their compliance with the Commission's requirements. He noted that while the attestation serves as an initial record, it is not sufficient on its own. He stated that in cases where a complaint is filed, the Commission has the power to enforce the law with significant consequences for non-compliant municipalities.
  - Commissioner Roy inquired about the entity responsible for assessing the forfeiture of funds and determining non-compliance penalties. She also sought information on the government agency tasked with making these determinations.
    - DOL Potvin stated that in the case of non-compliance with the Commission's regulations by the host community, the responsibility for assessment would lie with the Commission itself. He expressed a belief that this process would involve notifying the municipality and engaging in a back-and-forth exchange. He noted that the aim would be for the municipality to adopt and comply with the required policies. He believed that if the municipality continued to be non-compliant, the Commission would have the authority to issue a notice detailing the violation, the fine amount and its allocation.
  - The Acting Chair posed a follow-up question, referencing DOL Potvin's earlier mention of complications in reviewing, approving and disapproving Municipal Equity plans. She acknowledged the Commission's authority to declare non-compliance by a municipality which would lead to potential fines. She sought clarification on the suggestion of taking an additional step. She requested a restatement of the





complications and limitations related to the Commission's ability to approve or disapprove of Municipal Equity plans.

- DOL Potvin clarified that he did not believe the Commission lacked the authority to perform those actions. He expressed that the Commission, as a body, could adopt policies to review and approve Municipal Equity plans. He remarked that his concern was not about the policy itself, but rather the process and procedure involved. He highlighted that changing the requirement from a notification to a regulatory approval at this stage could trigger a separate notification, public hearing and public comment period as per the procedures outlined by the Secretary of the Commonwealth for government agency regulations. He acknowledged the need for input from the legal team for a definitive opinion, as this change could require municipalities to seek approval for significant modifications that may fall outside the scope of the initial notice given to the public. He emphasized that his concern was primarily focused on the processing of the policy rather than the Commission's authority to enact it.
- Acting General Counsel, Andrew Carter (AGC Carter) acknowledged the concern and emphasized the importance of remaining within the scope of the draft regulations to avoid future legal challenges. He also noted that the Board had the authority to determine its own schedule for promulgating regulations and suggested revisiting the issue during the process of developing Social Consumption regulations. He acknowledged that ultimately, the final decision on whether to proceed with the change rested with the Board.
- The Acting Chair questioned how the threshold for scope, specifically how the proposed change could fall outside of the scope when the draft regulations already accounted for the Municipal Equity plan. She pointed out that the draft regulations included a requirement for the publication of Municipal Equity plans. She sought clarification on why this change would be considered outside the scope when the creation and publication of the plan were already addressed in the draft.
- AGC Carter stated that the scope was ultimately determined by the Board. He acknowledged that if the notice regarding the proposed change was deemed satisfactory and provided a reasonable amount of notice, it would be considered as further development of a specific regulation falling within the scope. He emphasized the need for caution in navigating this issue. He expressed the importance of being careful and ensuring that the progress made thus far in the process is maintained on solid ground, considering the extensive work invested in it.
- Commissioner Roy inquired about the possibility of incorporating the proposed change into the Social Consumption framework in the future. She suggested considering whether it could be included within the scope of the Social Consumption regulations to avoid the need for a separate promulgation process.





- AGC Carter noted that the situation being discussed was similar to the previous delivery issue raised by DOL Potvin. He mentioned that, out of caution, the Board had conducted additional hearings and continued the process to minimize the risk of future challenges. He emphasized that the level of risk tolerance would ultimately determine the approach. He also pointed out that previous iterations did not have the same time constraints as the current situation. He mentioned that the last statutory deadline was for the entire set of regulations during the initial promulgation, where everything was within the scope. He acknowledged that the Board, as the agency's leadership, had the authority to make the final decision on this matter.
- The Acting Chair questioned whether it would be within the Commission's scope to include a provision for the Commission to receive those plans, without implementing an approval process. She highlighted the existing language in the draft regulations which states that the plans should be published in a conspicuous location within the host community's office and website.
  - DOL Potvin concurred with AGC Carter's remarks regarding risk appetite. He stressed the need for caution at the present stage and believed that the level of risk had considerably diminished. He proposed a modification to the requirement and suggested that an attestation be included along with verified documents and plans as a single package submitted to the Commission. He clarified that the municipal equity aspect fell within the scope but acknowledged that modification of the process could raise concerns. He believed that the proposed modification would effectively reduce the risk.
- DOL Potvin read through 935 CMR 500.181(3)(c) and addressed the proposed modification.
- Commissioner Camargo requested the inclusion of the word "Equity" under 935 CMR 500.181(3)(2).
- EC Lopez read proposed language for Subsection (d).
  - The Board reached consensus on the proposed language.
- AGC Baker proceeded to read 935 CMR 500.181(3)(c)(1) and addressed the proposed modifications.
  - The Board encountered confusion and adjustments were made to the language, particularly in Subsection (c) regarding pre-verified individuals or entities.
  - EC Lopez suggested including pre-verified individuals or entities to the language.
  - The Board proposed various versions of the language, including considerations for individuals of African American, Hispanic, Latino, Native American, or indigenous descent.
- Commissioner Stebbins pointed out a missing inclusion of Social Equity businesses in the introduction paragraph of the regulations.
  - EC Lopez proposed language that encompassed pre-verified individuals or entities, Social Equity businesses, and licensed applicants designated as Social Equity program (SEP) participants or Economic Empowerment Priority applicants (EEPA).





- The Board reached consensus on the proposed language.
- AGC Baker proceeded to read the proposed language relative to Section (c) of 935 CMR 500.181.
- Commissioner Roy raised a question regarding the scenario where no applicants from the identified groups applied for additional licenses in a community. She questioned that if none of these groups applied would the licenses remain unissued.
  - DOL Potvin acknowledged the possibility of interpreting Commissioner Roy's scenario in a specific way. He explained that, hypothetically, if the application numbers were to increase, the Commission could issue two additional licenses while adhering to the existing provision. He believed that in this situation, the Commission would have a license or a host community agreement but would not be able to grant permission to another business unless it met the necessary qualifications.
- Commissioner Roy referred to the Massachusetts Municipal Association (MMA) and read some of their testimony. She stated that the testimony questioned whether the draft regulations should include an option for a retention period, during which licenses would be reserved for Social Equity applications.
  - The Acting Chair asked Commissioner Roy if she had a proposed change.
  - Commissioner Roy expressed her intention to gauge the opinions of her fellow commissioners. She sought agreement on the idea of implementing a retention period during which licenses would be reserved for Social Equity applications, and if none came forward within that period, the licenses could be issued to other individuals or entities. She suggested that if the retention period elapsed without any applicants coming forward, the licenses could then be issued to other individuals, entities, or applicants.

Commissioner Stebbins moved to take a five-minute recess.

- Commissioner Camargo seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved taking a five-minute recess, returning at 3:32PM (06:16:22)
- The Acting Chair thanked stakeholders for their engagement and the submission of comments.
- Commissioner Roy read an email from Kevin Gilnack in which he expressed concerns about undermining equity policies and proposing solutions for unused licenses.
  - Commissioner Stebbins proposed giving communities the opportunity to ask questions relative to Social Equity plans.
  - Commissioner Roy expressed concern whether the existing provision would





- withstand legal scrutiny while ensuring the protection of the Commission.
- EC Lopez provided guidance and stated that the Commission has the authority to establish policies aimed at promoting equity. She emphasized that noted that it was relevant determining a time frame was a policy decision within the Commission purview to make.
- AGC Carter shared his perspective on the question of timing and expressed that it was directly relevant to the policy debate. He concluded by stating that the final decision regarding comfort level rested with the Board.
- Commissioner Roy reiterated her question whether the provision would withstand legal scrutiny.
- AGC Carter responded to Commissioner Roy's question and echoed EC Lopez's statement that the provision was connected to the statute. He recognized that any regulations they promulgated would inevitably face some level of challenge. He emphasized that the primary objective of the Board was to ensure that the promulgated regulations were consistent with statutory authority. He reiterated that operating within the confines of the statute provided the safest framework for the Board.

Commissioner Camargo moved to take a fifteen-minute recess.

- Commissioner Roy seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved taking a fifteen-minute recess, returning at 4:15PM (06:43:22)
- AGC Baker provided an overview of 935 CMR 500.181(3)(d) which states that host communities must adopt local rules or bylaws to comply with the specified section.
- AGC Baker moved on to 935 CMR 500.181(3)(e) which allows any interested person to file a complaint with the Commission alleging non-compliance with an Equity requirement. He continued reading other Sections.
- Commissioner Camargo inquired about the term "Equity parties" and whether it needed a definition.
  - EC Lopez explained that the term was introduced to specify the parties involved in negotiations, including Social Equity businesses, licensed applicants, and pre-verified individuals/entities.
  - Commissioner Camargo sought confirmation from the Commission that the definition provided was sufficient.
  - The Board agreed that the current language adequately addressed the term.
- Commissioner Stebbins inquired about the possibility of adding Social Equity business to Section (a).





- EC Lopez inquired if the concern was around the clarity of the last sentence regarding Equity parties and application renewals. She discussed the renewal of licensure and the potential need to renegotiate an HCA. She questioned whether Social Equity businesses should be included in the negotiation process, along with licensed applicants who qualify for Social Consumption Program (SCP) or Economic Empowerment Applicant (EEA) statuses.
- DOL Potvin explained that Equity Standards for host communities during negotiations with Social Equity businesses and licensed applicants were outlined in 935 CMR 500.181(4)(a). He noted that while “Equity parties” was not a defined term, he believed it was intended to encompass Social Equity businesses according to the Municipal Equity Working Group. He suggested amending the designation to EEPA or both. He noted that the decision of including pre-verified or verified Social Equity businesses in this subsection likely involved a policy determination by the Commission. He acknowledged that the section presented an opportunity for the Board to adopt a policy that included verified or pre-verified Social Equity businesses.
- The Acting Chair acknowledged a drafting error, and the need to amend the section was recognized.
- DOL Potvin emphasized the important distinction between pre-verified and licensed Social Equity businesses, especially during the initial application for licensure. He recognized that license renewals, pre-verified and verified Social Equity businesses should be considered to ensure access and benefits for the entire eligible population. He suggested including both pre-verified and verified Social Equity businesses in negotiations for new license applications and renewal applications.
- Commissioner Roy raised the issue of whether already established Social Equity businesses seeking additional licenses should be prioritized.
  - DOL Potvin clarified that including them as licensed applicants who have already been designated as SCP or EEA would cover their situation adequately. DOL Potvin discussed that interpretation of the current language and the need to ensure that the policy would effectively achieve its goals without leaving anyone behind due to technicalities.
- The Board explored the definition of a Social Equity business and its inclusion in the negotiation process for licensure and renewal.
- Commissioner Stebbins raised concerns about the current definition, which only referred to individuals who had been in the SCP or Economic Empowerment.
- Commissioner Roy suggested reversing the strikeout of "or otherwise eligible" to cover the intended scope.
  - EC Lopez advised against it, highlighting that the legislature had defined Social Equity businesses as limited to licensed establishments.
  - The Board considered the legal advice and concluded that the strikeout should remain.
- Commissioner Stebbins expressed his desire to revisit the definition of Social Equity business. He noted, that according to the statute, a marijuana establishment, including retailers, cultivators, testing labs and product manufacturers, should have a majority ownership of at least 51% by individuals who are eligible for the Social Equity





- program under Section 22 or whose ownership would qualify as EEPA.
- EC Lopez stated that a marijuana establishment is already a licensed entity. She clarified that the individuals within that establishment are considered eligible and indicated that the Commission had already made an eligibility determination or their ownership qualifies them as an EEA. She emphasized that using the phrase “or otherwise qualifies” would introduce a future-looking element, which is not covered by the statute.
  - Commissioner Stebbins revisited the definition of Social Equity business. He noted that the legislature had written the new definition in a way that referred to individuals who had gone through the Social Equity program and been certified rather than including those who may have been eligible.
    - EC Lopez confirmed Commissioner Stebbins’ understanding and explained that the language should be interpreted at face value unless it was ambiguous.
    - Commissioner Camargo introduced the concept of an Equity Participant definition and suggested that it could be beneficial in the future but acknowledged that it might be out of scope for the current discussion.
  - Commissioner Roy questioned whether the threshold for majority ownership in the Social Equity business definition aligned with the EEPA definition.
    - DOL Potvin addressed the interpretation of majority ownership as anything greater than a certain percentage. He noted that due to a new statute, businesses with ownership below that percentage may be affected and lose certain benefits. He suggested that a regulatory change would be required to address this issue.
    - Commissioner Roy acknowledged the complexity of the situation and asked if there was a temporary solution.
    - DOL Potvin explained that using multiple terms to identify the affected population could be a temporary fix.
    - Commissioner Roy agreed with this approach to ensure that the population is not excluded.
  - AGC Baker inquired about clarifying the changes that were being made, either through the definition or under Section (4)(a). He wanted to ensure that the record accurately reflects reflected the decisions that had been made.
    - The Acting Chair proposed not making any modifications. She inquired with her fellow commissioners if they were all in agreement to maintain the current definition without implementing any changes.
    - Commissioner Roy raised concerns about leaving the current definition unchanged, as it could exclude certain individuals until further revisions are made.
    - DOL Potvin provided an explanation, stating that Social Equity businesses should include both verified and pre-verified license holders. Commissioner Stebbins expressed broader concerns about the definition and the need to capture a larger group of individuals through pre-verification.
    - The Board’s discussion revolved around ensuring that the definition included both current license holders and those who would be eligible but not yet licensed.





- Commissioner Roy questioned the accuracy of the title in Subsection 4(a).
  - DOL Potvin suggested changing the statutory definition of "Social Equity Business" to "Social Equity Parties."
  - The Board reached consensus and agreed to change the title to "Equity standards for host communities during HCA negotiations with Equity parties."
- AGC Baker proceeded to read the next sections.
- Commissioner Roy raised a question regarding the inclusion of "good faith" in the HCA (Host Community Agreement) section and its absence in other sections.
  - EC Lopez stated that she believed the inclusion of this point was intended to address the implied warranty of good faith and fair dealing in any contract negotiation. She mentioned that the point being made was perhaps to explicitly state it, but she also noted that the Commissioners had the option to remove it if they wished.
  - Commissioner Roy inquired why the provision was not applicable or recommended for HCAs in general.
  - EC Lopez explained that the discussion of bad faith versus good faith arose in the context of discontinuing operations. She expressed that the question was whether a host community could impose a good faith requirement when ending a relationship, which served the same purpose as prohibition against bad faith. She noted that the latter approach would be easier to handle during an investigation. She acknowledged Commissioner Roy's point but clarified that the current provision focused on affirmative actions that the host community must take during HCA negotiations with an equity party. She indicated that if the bad faith angle were to be explored further, it would likely fall under prohibited practices rather than the actual affirmative actions in the negotiation process.
  - Commissioner Roy inquired about the feasibility of incorporating the discussed provision into regular negotiations. She suggested negotiating the terms of an HCA in good faith under the section pertaining to affirmative actions.
  - EC Lopez confirmed that the Board had the authority to explore the suggestion brought up by Commissioner Roy if it was something the Body wished to pursue.
- AGC Baker read Section (d), Prohibitive Practices
  - Commissioner Roy proposed adding language as a standalone Section (4).
  - The Board reached consensus on the proposed language.
- The Board moved on to discussing the inclusion of affirmative obligations for host communities in the general negotiation process.
  - The Board reached consensus on the proposed language.
- AGC Baker read 935 CMR 500.181(5)(a) which addressed the donation of a minimum of three percent of each CIF to the Cannabis Social Equity Trust Fund.
  - Commissioner Stebbins raised concerns about the language and suggested striking the entire Section (a).





- Commissioner Camargo questioned whether the language in Section (b)(1) was present elsewhere in the regulations, as it seemed to imply that only licensees could donate. She expressed her understanding that if the language was already included, striking it would be unnecessary. She wanted to ensure that the requirement to commence operations for donation was still present, as it would be a matter for policy discussion.
- Commissioner Roy questioned the requirement for licensees to have authorization to commence operations in order to donate to the Trust Fund.
- The Acting Chair inquired if EC Lopez had any insights regarding the potential impact or consequences that would arise if the language in question was removed.
  - EC Lopez explained that the language in question was initially included as placeholder to ensure compliance with statutory obligations. She stated the matter had not been previously explored as a policy issue. She indicated the statute mandated that the Commission establish criteria for licensees to fulfill their Positive Impact Plan (PIP) requirement by donating a percentage of their revenue to the trust fund.
  - DOL Potvin noted that the obligation to positively impact areas of disproportionate impact as applied to applicants and licensees was now required by statute. He referred to a provision in Chapter 180 which mandated the Commission to establish minimum acceptable standards for host communities to positively impact disproportionately harmed communities. He explained that host communities had a role to play in positively impacting areas of disproportionate impact. He addressed a minor issue regarding the language related to licensees needing authorization to commence operations in order to donate to the Cannabis Social Equity Trust Fund. He highlighted that Commissioner Roy's concern was not wanting to prohibit or eliminate the possibility of someone with a final or provisional license from donating. He explained that there was currently an understanding that applicants or licensees who had not yet commenced operations were expected to fulfill the majority of their goals which included making donations once they started generating revenue. He noted that the existing language limited the population to only those who had commenced operations. He recommended to strike Section (1).
  - Commissioner Roy expressed agreement with DOL Potvin proposal to strike 935 CMR 500.181(5)(b)(1). She noted that keeping the language would unintentionally harm the fund by limiting donations. She pointed out that some individuals remain in the provisional phase for an extended period and may have the resources and willingness to donate. She emphasized that restricting the ability to contribute would have unintended consequences and negatively impact the fund.
- EC Lopez questioned whether the Board was ready to discuss and determine the criteria for donation. She emphasized the need for criteria to be established as it was an obligation mandated by the statute.





- The Acting Chair made an executive decision and stated that more time was needed to thoroughly discuss the matter at hand. She emphasized the importance of creating criteria for municipalities, entire communities and licensees to follow. She recognized the potential for confusion and proposed putting a pause on the discussion and returning to it the following day to ensure a clearer and more focused approach.

3) Adjournment – 08:59:23

- Commissioner Stebbins moved to adjourn.
- Commissioner Camargo seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved the motion to adjourn.





**From:** [Cannabis Control Commission](#)  
**To:** [Callie MacDonald](#); [Jessica Porter](#)  
**Subject:** Fw: 1:1 licensing cap ratio  
**Date:** Thursday, September 21, 2023 4:00:11 PM  
**Attachments:** [Outlook-pr5l4iir.png](#)

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**Kathy Oliver Jones, Director of Constituent Services**

Pronouns: She, Her  
Cannabis Control Commission  
Union Station  
2 Washington Square  
Worcester, MA 01604

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**From:** Kevin Gilnack <kevin@masseon.com>  
**Sent:** Thursday, September 21, 2023 3:33 PM  
**To:** Nurys Z Camargo <Nurys.Camargo@cccmass.com>; Ava Concepcion <Ava.Concepcion@cccmass.com>; kimberly.driscoll@mass.gov <kimberly.driscoll@mass.gov>; Bruce Stebbins <Bruce.Stebbins@cccmass.com>  
**Cc:** Cannabis Control Commission <commission@cccmass.com>; Matt Giancola <Matt.Giancola@cccmass.com>  
**Subject:** 1:1 licensing cap ratio

Dear Chair Concepcion & Commissioners,

I'm concerned that the only comments from stakeholders added to the record are those from MMA seeking to undermine equity policies.

Your policy requiring municipalities that change their caps to reserve at least half for equity businesses is a critical tool for advancing municipal equity in line with your powers under the law.

If a town doesn't have an equity applicant, it is because it has utterly failed in its equity efforts and a sign that if it wants to fill that cap, it should improve.

The hypothetical concern about unused licenses pales in comparison to the dire stats on the existing ratio of equity to non-equity licensees across the state.

Should this hypothetical problem ever arise, the Commission could consider waivers or address this issue at a future reg review session, just as you may do with the very sound (and seemingly related) policy enhancement to change equity plan attestations to reviews.

To the department from 1:1 at this point would seem a material change from the published draft...



Thanks,  
Kevin





**MMA** | Massachusetts  
Municipal  
Association

September 8, 2023

Cannabis Control Commission  
(via [Commission@CCCMass.com](mailto:Commission@CCCMass.com))  
Union Station  
2 Washington Square  
Worcester, MA 01604

*Delivered Electronically*

Dear Members of the Cannabis Control Commission:

The Massachusetts Municipal Association (“MMA”) joins with the Massachusetts Municipal Lawyers Association (“MMLA”) in providing the following comments to the Cannabis Control Commission’s (“CCC”) filed 935 CMR 500.000 Adult Use of Marijuana Draft Regulations (“Draft Regulations”).

By way of context, our organizations support the goal of the Commonwealth, in the adoption of Chapter 180 of the Acts of 2022 (“Chapter 180”) to promote equity in the cannabis industry and create guidelines around licensing. However, both of our organizations have significant concerns about the Draft Regulations' retroactive effect on existing Host Community Agreements (“HCAs”) and the unduly burdensome requirements for municipalities in order to meet equity requirements. We believe the Draft Regulations are a violation of the Contract Clause of the U.S. Constitution, and that the administrative burden would create an unfunded mandate on municipalities in violation of Proposition 2½, while the end result would stifle the growth of the cannabis market and jeopardize the true intent of the legislation — to increase equity in the industry. These are not new issues - in fact the MMA and the MMLA raised significant concerns about retroactivity when the legislation was pending and those concerns have not been resolved.

This comment letter includes a legal analysis including instances where the Draft Regulations exceed the statutory language, and a review of the practical implications of the Draft Regulations. It also includes as an attachment, a redlined version of the Draft Regulations, pointing to specific provisions of the Draft Regulations that are discussed in this comment letter. These comments are offered, and we hope they are received, as constructive criticism and a basis for refining any final version of the Regulations. More importantly, we believe that the goal of Chapter 180 would be better achieved through a revised approach as we outline herein, and we offer the assistance of our organizations in the recrafting of the Regulations in the interest of a



greater likelihood of success for meeting the goals of Chapter 180, and to create a clear streamlined approach for all stakeholders.

*Summary of Comment Letter:*

- *The Draft Regulations are incompatible with the Contract Clause of the Constitution by applying retroactively to existing contracts which were negotiated in good faith before passage of Chapter 180.*
- *The framework for review and approval of community impact fees continues to lack the clarity and transparency necessary to create a predictable process, while the definition of “Reasonably Related” as to require an “enhanced need” is incompatible with the existing definition in Chapter 180. Additionally, the process heavily favors the licensee, giving significantly more time for the licensee to pay out its impact fees, and unnecessarily limiting a host community’s timeline.*
- *The Draft Regulations exceed the enforcement authority of the CCC by allowing it significant discretion in extending license expiration dates and through the imposition of penalties and fines to municipalities for non-compliance.*
- *The Draft Regulations create an unfunded mandate on municipalities by requiring a significant administrative burden in order to encourage full participation of equity businesses without allowing for a reimbursement mechanism.*
- *The imposition of a mandatory donation of 3% of CIFs to the Social Equity Fund is a violation of the Constitution and applicable Massachusetts General Laws.*
- *The Draft Regulations must cite to applicable Division of Local Services, Local Finance Opinions (LFOs) and Informational Guideline Releases (IGRs), as they may be amended from time to time. Such guidance under municipal finance law is essential in order for municipalities to implement the limitations imposed by the Draft Regulations on how a community may spend a CIF. Generally, to the extent a host community collects a CIF, it goes to the general fund and is appropriated through the legislative body, which may be Town Meeting, unless a separate stabilization fund is created. The Draft Regulations do not appear to consider the Department of Revenue’s guidance on this point. Section 500.180(2)(j)(3)*
- *Attorneys’ Fees should be recoverable as part of a CIF. Section 500.180(2)(j)(6) prohibits a provision in HCAs that imposes legal, overtime or administrative costs. Attorney fees are clearly Reasonably Related, and are documented. In fact, the Draft Regulations increase the need for attorney services to negotiate and re-negotiate HCAs,*



*and to provide other compliance-related guidance, and yet attorneys' fees appear to not be recoverable under the Draft Regulations. These costs are an impact that are unique to that particular establishment.*

- *Section 500.850: Waivers, is not contemplated by Chapter 180.*
- *“Good compliance standing” must be defined. Section 500.180(2)(e) states that “Approval of HCAs may be conditioned on a Host Community being in good compliance standing with the Commission relative to any HCA to which the Host Community is a contracting party. Clarity on this point is necessary.*
- *The Draft Regulations do not provide clarity regarding the permitted duration of a HCA or from when the term is measured. May HCAs be for a term of no more than 9 years, or is it up to 8 years? Certainty on the permitted duration of an HCA and start dates would be appreciated.*
- *Of note, there is no process for the yielding-up or surrendering of a license in the Draft Regulations.*
- *Certainty regarding the process for municipal fines under Section 500.360 would be appreciated; including how a municipality must appropriate or allocate any such fine, as well as a process for curing or appealing alleged infractions.*
- *The Draft Regulations should provide an option for a retention period, during which licenses are held and reserved for social equity applications, after which time, if none, then they can be issued to other establishments.*

#### **A. Retroactive Application to Existing Contracts in the Draft Guidelines**

The MMA and the MMLA have raised concerns regarding the perils of applying Chapter 180 retroactivity to existing contracts numerous times. More than 1,000 contracts negotiated in good faith by municipalities and marijuana licensees have been put in place since the legalization of the recreational industry in the Commonwealth. Many of these contracts include mutually-agreed-to provisions on community impact fees, which helped to coax many municipalities into sanctioning the industry and establishing the platform for its growth.

Regulations that would retroactively apply to host community agreements that were executed before Chapter 180's effective date would invite substantial litigation under the Contract Clause of the U.S. Constitution, and would future disincentivize communities from allowing continued



growth and expansion of the industry in their municipality. This would further provide a counterproductive marketplace advantage for incumbent recreational enterprise operators and would jeopardize the primary intent of the new law, which is focused on accelerating social equity entrants in Massachusetts. Further, preventing the collection of fees by municipalities as agreed upon in their HCAs may also constitute an unlawful taking of revenue sources, as prohibited under M.G.L. Ch. 29 §27C.

Host community agreements have a term of five years, with many expiring shortly. Upending the industry by worsening costly litigation serves little purpose given this timeline and the burgeoning industry's long future. We strongly urge the Draft Regulations to lay out a two-tiered approach: one for license renewal of firms with existing HCAs, which were negotiated in good faith and are protected by the Contract Clause of the Constitution, and one for the licensure and license renewal of firms with new HCAs that were executed after the new law's effective date. This would move the industry forward by avoiding statutory encroachment of existing HCAs, prevent extensive and costly legal challenges, match the legislative intent to create opportunities for social equity firms, and protect taxpayers and municipalities from destabilizing and unfair retroactive changes.

**B. The Draft Guidelines Are Weighed Heavily in Favor of Licensees and Lack Clarity and Transparency in Defining and Determining Community Impact Fees**

The Draft Regulations fail to define what a “reasonably related” community impact fee is, with an increasingly narrow definition failing to explain what might meet its threshold. The definition created requires “a demonstrable nexus between the actual operations...and an enhanced need for a Host Community's goods or services in order to offset the impact of operations.” This “enhanced need” creates a seemingly higher threshold than considered in Chapter 180, but the Draft Guidelines offer no examples or guidance on what this might look like.

The Draft Regulations create a framework of the process the CCC will undertake when reviewing the community impact fees, as well as a “Sunshine Requirement” for Host Communities to itemize each cost, but fails to require a similar spotlight on the CCC's review, offering no predictability as to what costs may in fact be recognizable. Without clarity in definition and transparency in the system, the CCC and municipalities are likely to continue to be bogged down by the process, as municipalities see what sticks and the CCC continually makes determinations under a shroud.

Additionally, the timeframe for requesting and collecting impact fees is weighed heavily in favor of the licensee while limiting the window for impact fee assessments for municipalities. 500.180 Section (4)(a)4 states that “the initial invoice period of alleged impact fees covers a one-year period that starts from the date the Commission grants a Marijuana Establishment final license.”



This negates the fact that there may be significant financial impacts to a municipality *before* a final license is issued, and which may be “reasonably related” to the licensee, including permitting, inspection and legal fees which would not be associated with any other type of business.

Further, section (4)(a)5(b) requires the Host Community to transmit the impact fee invoice to the CCC no later than one month after the anniversary of the date of licensing, otherwise it will forfeit the fees. The Marijuana Establishment is given a term of eight months to pay the incurred fees and can request an administrative hearing to challenge the findings of the Commission. The Host Community is given no similar recourse to challenge the CCCs impact fee determination. While the underlying intention of these sections may be to induce municipalities to scrap impact fees altogether, the result may instead be a cooling reception of the industry in municipalities that already have licensees, and a disinterest in welcoming any by those who have none.

We would suggest allowing municipalities to recoup expenses as they occur, even if this includes expenses incurred before a final license is granted, with a window to file up to one year from occurrence. We also suggest the CCC create a more transparent process for determining impact eligibility so that municipalities and licensees might know ahead of time what expenses they may each be liable for, as well as an example list of eligible recoverable impacts.

### **C. The Draft Regulations Exceed Enforcement Authority**

The CCC’s statutory authority under Chapter 180 is to review, regulate, enforce and approve host community agreements as stated in the Draft Regulations 500.180 section 1. However, the Draft Regulations exceed this statutory authority in multiple ways. Allowing marijuana establishments to apply for equitable relief at the CCC’s discretion and by levying penalties and fines on non-compliant host communities, the CCC exceeds its authority. Regulations are limited by the scope of the statute they implement and cannot impose sanctions or obligations that are in excess of the underlying legislative action.

In 500.180 of the Draft Regulations, section (3)(c)5 states that a Marijuana Establishment may seek equitable relief if a Host Community discontinues relations with it, allowing the CCC to “exercise its discretion to grant one of more of the following equitable remedies to a Marijuana Establishment: (i) Extension of a License expiration date without incurring additional prorated fees...(iii) other equitable relief as determined by the Commission.” It is unclear how a license expiration would work with a host community that intends to discontinue relations, but in no lawful way can the CCC legally bind a municipality to an expired contract. Additionally, the broad discretion given to the CCC for “other equitable relief” is never considered in Chapter 180.



500.360 of the Draft Regulations lays out Fines and Sanctions for licensees, registrants and host communities. Again, this exceeds the statutory authority of the CCC, which may only review, renew and grant host community agreements under its licensing authority.

**D. Administrative Burden of the Social Equity Requirements Creates an Unfunded Mandate**

The Draft Regulations create an unfunded mandate on municipalities by requiring a significant administrative burden in order to encourage full participation of equity businesses. The requirements for municipalities to affirmatively open access to social equity businesses is a higher standard than any other business it encourages within its borders. 500.181 section 3 of the Draft Regulations requires a municipality to publicize its local approval process, including meeting schedules for public bodies involved - this approval process often involves planning and zoning boards, select boards, and can even encompass historical commissions and others. No other industry requires this type of publication.

500.181 (3)2 requires a Host Community to “develop a plan to promote and encourage full participation in the regulated cannabis industry by individuals disproportionately harmed by cannabis prohibition and enforcement and to positively impact those communities...” Notwithstanding how such a positive impact would be determined, municipalities are not experts in this field, and cannot be expected to do the work regulators failed to do at the onset. Complying with this section would require additional trained staff, triggering the unfunded mandate law under Proposition 2½.

Finally, 500.181(4) requires a Host Community to engage in further administrative burdens which are not imposed in any other contracting or licensing process, including a minimum of two conferences, providing a certified interpreter or translator in all negotiation discussions and conferences, and consideration of flexible terms including capital.

All of these costs would take place before a license is granted, negating them from the possibility of reimbursement under 500.180 Section (4)(a)4 and therefore would create a large unfunded mandate. While the goals of 500.181 are laudable, putting the burden on municipalities in this way will thwart those efforts. Municipalities will have little incentive to welcome additional equity businesses within their borders, and instead create a further entrenchment of existing non-equity licensees.

We suggest that the CCC set aside funding to cover these costs, including developing and training experts to understand the true administrative hurdles and needs of social equity businesses, a list of certified interpreters and translators they will contract with for negotiations



and discussions, and a fund for flexible capital. This would keep control of this important function within the CCC and ensure consistency across the state.

#### **E. The Mandatory Donation is Unlawful**

500.181(5) requires a Host Community to donate, “at a minimum, 3% of each CIF it receives from a Licensee” to the Cannabis Social Equity Trust Fund. While properly funding the Social Equity Trust Fund is extremely important to help reach equity goals, requiring 3% of agreed upon impact fees to go toward the fund rather than reimbursing the impact it represents seems not only contrary to its stated “reasonably related” purpose, but also would likely constitute a violation of the Constitution and Massachusetts General Laws. Further, there is no mechanism in municipal finance law to set aside a percentage of this revenue.

#### **Conclusion**

The MMA and MMLA recognize and respect the challenges that come with crafting regulations, guidelines, and policies to implement a legislative initiative. This is a task that communities must also undertake at the municipal level. What is critical to successful implementation is the participation of the stakeholders. Municipalities must be included as important stakeholders in these discussions if they are expected to continue to open their doors to the industry. It is important that regulations continue to build upon the partnerships between the industry and their hosts, rather than work to further create an adversarial rift.

For all of the reasons discussed above, the MMLA and the MMA respectfully request that our organizations, acting on behalf of our members, be involved in the revision of the Draft Regulations. If you have questions or desire additional comment, please contact MMA Legislative Analyst Ali DiMatteo at [adimatteo@mma.org](mailto:adimatteo@mma.org) and Karis L. North, Esq. of MMLA at [knorth@mhtl.com](mailto:knorth@mhtl.com).

Thank you for your time and consideration of the above comments and recommendations.

Sincerely,



Geoffrey C. Beckwith  
Executive Director & CEO  
Massachusetts Municipal Association



Karis L. North, Esq.  
President  
Massachusetts Municipal Lawyers  
Association



CANNABIS CONTROL COMMISSION

**September 29, 2023**  
**10:00 AM**

**Via Remote Participation via [Microsoft Teams Live\\*](#)**

**PUBLIC MEETING MINUTES**

**Documents:**

- N/A

**In Attendance:**

- Acting Chair Ava Callender Concepcion
- Commissioner Nurys Z. Camargo
- Commissioner Kimberly Roy
- Commissioner Bruce Stebbins

**Minutes:**

**1) Call to Order**

- The Acting Chair recognized a quorum and called the meeting to order.
- The Acting Chair gave notice that the meeting is being recorded.

**2) Executive Session - 00:00:31**

- The Acting Chair noted that the Commission would not return to Open Session after its Executive Session Deliberations.
- The Acting Chair asked for questions or comments.
- Commissioner Stebbins moved to enter into Executive Session pursuant to the Open Meeting Law, G.L. c. 30A, § 21(a)(9), to discuss strategy with respect to collective bargaining or litigation if an open meeting may have a detrimental effect on the bargaining or litigating position of the public body.
- Commissioner Roy seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission voted to enter Executive Session by a vote of four in favor and none opposed.





The Commission entered the Executive Session (00:02:34).





**Ashli's, Inc.**  
**0245-COO-03-0923**

**CHANGE OF OWNERSHIP AND CONTROL OVERVIEW**

1. Licensee Information:

Ashli's, Inc.

License Number	License Type
MR281332	Retail

2. The licensee has paid the applicable fees for this change request.

3. The licensee is proposing to add the following as Persons Having Direct or Indirect Control:

Individual	Role
Manpreet Singh	Person with Direct or Indirect Control
Aman Kaur	Person with Direct or Indirect Control
Parvinder Kaur	Person with Direct or Indirect Control

4. The licensee is proposing to add the following as Entities Having Direct or Indirect Control:

Entity	Role
Blooming Bliss, LLC	Entity with Direct or Indirect Control

5. Background checks were conducted on all proposed parties and no suitability issues were discovered.

6. The proposed parties do not appear to have exceeded any ownership or control limits over any license type.

7. Commission staff conducted an organizational and financial inspection into the parties associated with this request and found no issues or inconsistencies with the information provided to the Commission.

**RECOMMENDATION**

Commission staff recommend review and decision on the request for change of ownership and





control, and if approved, request that the approval be subject to the following conditions:

1. The licensee and proposed parties may now effectuate the approved change.
2. The licensee shall notify the Commission when the change has occurred.
3. The licensee shall submit a change of name request following this approval if any business or doing-business-as names associated with the license(s) will require modification.
4. The licensee is subject to inspection to ascertain compliance with Commission regulations.
5. The licensee shall remain suitable for licensure.
6. The licensee shall cooperate with and provide information to Commission staff.
7. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and/or 935 CMR 501.105(1) after effectuating the change, if applicable, and shall give Commission staff adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.





**Aunty Budz, LLC**  
**0255-COO-03-1123**

**CHANGE OF OWNERSHIP AND CONTROL OVERVIEW**

1. Licensee Information:

Aunty Budz, LLC

License Number	License Type
MB282396	Marijuana Microbusiness

2. The licensee has paid the applicable fees for this change request.

3. The licensee is proposing to add the following as Persons Having Direct or Indirect Control:

Individual	Role
James Johnson	Person with Direct or Indirect Control

4. The licensee is proposing to add the following as Entities Having Direct or Indirect Control:

Entity	Role
Canon Assets, LLC	Entity with Direct or Indirect Control

5. Background checks were conducted on all proposed parties and no suitability issues were discovered.

6. The proposed parties do not appear to have exceeded any ownership or control limits over any license type.

7. Commission staff conducted an organizational and financial inspection into the parties associated with this request and found no issues or inconsistencies with the information provided to the Commission.

**RECOMMENDATION**

Commission staff recommend review and decision on the request for change of ownership and control, and if approved, request that the approval be subject to the following conditions:





1. The licensee and proposed parties may now effectuate the approved change.
2. The licensee shall notify the Commission when the change has occurred.
3. The licensee shall submit a change of name request following this approval if any business or doing-business-as names associated with the license(s) will require modification.
4. The licensee is subject to inspection to ascertain compliance with Commission regulations.
5. The licensee shall remain suitable for licensure.
6. The licensee shall cooperate with and provide information to Commission staff.
7. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and/or 935 CMR 501.105(1) after effectuating the change, if applicable, and shall give Commission staff adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.





**Canna Provisions, Inc.**  
**0256-COO-02-1123**

**CHANGE OF OWNERSHIP AND CONTROL OVERVIEW**

1. Licensee Information:

Canna Provisions, Inc.

License Number	License Type
MC282476	Cultivator
MC281970	Cultivator
MC283454	Cultivator
MP281964	Product Manufacturer
MR281778	Retailer
MR281796	Retailer

2. The licensee has paid the applicable fees for this change request.

3. The licensee is proposing to add the following as Entities Having Direct or Indirect Control:

Entity	Role
Canna Provisions Employee Stock Ownership Trust	Entity with Direct or Indirect Control

4. Background checks were conducted on all proposed parties and no suitability issues were discovered.

5. The proposed parties do not appear to have exceeded any ownership or control limits over any license type.

6. Commission staff conducted an organizational and financial inspection into the parties associated with this request and found no issues or inconsistencies with the information provided to the Commission.

**RECOMMENDATION**





Commission staff recommend review and decision on the request for change of ownership and control, and if approved, request that the approval be subject to the following conditions:

1. The licensee and proposed parties may now effectuate the approved change.
2. The licensee shall notify the Commission when the change has occurred.
3. The licensee shall submit a change of name request following this approval if any business or doing-business-as names associated with the license(s) will require modification.
4. The licensee is subject to inspection to ascertain compliance with Commission regulations.
5. The licensee shall remain suitable for licensure.
6. The licensee shall cooperate with and provide information to Commission staff.
7. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and/or 935 CMR 501.105(1) after effectuating the change, if applicable, and shall give Commission staff adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.





**West County Collective, LLC**  
**0264-COO-01-1223**

**CHANGE OF OWNERSHIP AND CONTROL OVERVIEW**

1. Licensee Information:

West County Collective, LLC

License Number	License Type
MC281512	Cultivator

2. The licensee has paid the applicable fees for this change request.

3. The licensee is proposing to add the following as Persons Having Direct or Indirect Control:

Individual	Role
Gurdamanjeet Singh	Person with Direct or Indirect Control

4. Background checks were conducted on all proposed parties and no suitability issues were discovered.

5. The proposed parties do not appear to have exceeded any ownership or control limits over any license type.

**RECOMMENDATION**

Commission staff recommend review and decision on the request for change of ownership and control, and if approved, request that the approval be subject to the following conditions:

1. The licensee and proposed parties may now effectuate the approved change.
2. The licensee shall notify the Commission when the change has occurred.
3. The licensee shall submit a change of name request following this approval if any business or doing-business-as names associated with the license(s) will require modification.
4. The licensee is subject to inspection to ascertain compliance with Commission regulations.
5. The licensee shall remain suitable for licensure.
6. The licensee shall cooperate with and provide information to Commission staff.
7. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and/or 935 CMR 501.105(1) after effectuating the change, if applicable, and shall give Commission staff adequate opportunity to review said





plans at the business location or the location where any such plans are maintained in the normal course of business.





## **Marijuana Establishment Renewals**

### **Executive Summary**

**Commission Meeting: February 8, 2024**

#### **RENEWAL OVERVIEW**

1. Name, license number, renewal application number, host community, and funds deriving from a Host Community Agreement allocated for the municipality for each Marijuana Establishment presented for renewal:

	Licensee Name	License Number	Renewal Application Number	Location	Municipal Costs Disclosed
1	220 ONEIL LLC	MR284345	MRR206749	Attleboro	\$0.00
2	6 Bricks, LLC.	MR283098	MRR206580	Springfield	\$0.00
3	Apothca, Inc.	MR284429	MRR206762	Boston	\$0.00
4	Ascend Mass, LLC	MR282077	MRR206733	Boston	\$0.00
5	Assured Testing Laboratories LLC	IL281360	ILR267933	Tyngsborough	\$0.00
6	Atlantic Medicinal Partners, Inc.	MC281476	MCR140644	Fitchburg	\$0.00
7	Bask, Inc.	MR282284	MRR206697	Fairhaven	\$0.00
8	Bask, Inc.	MR282819	MRR206698	Taunton	\$0.00
9	Berkshire Roots, Inc.	MR281585	MRR206679	Pittsfield	\$0.00
10	Berkshire Roots, Inc.	MX281322	MXR126670	Pittsfield	\$0.00
11	Berkshire Roots, Inc.	MC281590	MCR140619	Pittsfield	\$0.00
12	Blossom Flower, LLC	MD1271	MDR272561	Holyoke	\$0.00
13	Boston Bud Factory Inc.	MR281525	MRR206513	Holyoke	\$0.00
14	Boston Bud Factory Inc.	MP281397	MPR244015	Holyoke	\$0.00
					



15	Bracts & Pistils, LLC	DO100103	DOR518296 7	Taunton	\$0.00
16	Canna Provisions Inc	MR28179 6	MRR206722	Lee	\$0.00
17	Canna Provisions Inc	MR28177 8	MRR206758	Holyoke	\$0.00
18	Caregiver-Patient Connection LLC	MC28220 6	MCR140651	Framingham	\$0.00
19	Caregiver-Patient Connection LLC	MP281301	MPR244122	Framingham	\$0.00
20	Caroline's Cannabis, LLC	MP282232	MPR244101	Hopedale	\$0.00
21	Coastal Healing, Inc.	MR28220 6	MRR206717	Westport	\$0.00
22	Coastal Healing, Inc.	MC28276 1	MCR140662	Westport	\$0.00
23	Coil Brothers LLC	MP281388	MPR244083	Harvard	\$0.00
24	Cypress Tree Management Natick, Inc.	MR28377 3	MRR206754	Natick	\$0.00
25	DMA HOLDINGS (MA), LLC	MC28270 3	MCR140654	Dudley	\$0.00
26	ELEVATION RETAIL II LLC	MR28388 7	MRR206748	Fairhaven	\$0.00
27	EMB Natural Ventures, LLC	MC28146 6	MCR140674	Holyoke	\$0.00
28	Enlite Cannabis Dispensary, LLC	MR28465 1	MRR206759	Springfield	\$0.00
29	Farma Gardens LLC	MB28238 9	MBR169319	Rowley	\$0.00
30	Four Daughters Compassionate Care, Inc.	MR28223 2	MRR206665	Plymouth	\$0.00
31	Full Harvest Moonz, Inc.	MR28247 4	MRR206715	Haverhill	\$0.00
32	Grass Appeal LLC	MP281406	MPR244123	Uxbridge	\$0.00
33	Grass Appeal LLC	MR28226 7	MRR206755	Uxbridge	\$0.00
34	Grass Appeal LLC	MC28212 3	MCR140667	Uxbridge	\$0.00
35	Green Gold Group Inc	MR28470 3	MRR206781	Palmer	\$0.00
36	GreenStar Herbals, Inc.	MR28220 7	MRR206741	Maynard	\$0.00
37	Health Circle, Inc.	MR28142 6	MRR206735	Rockland	\$0.00
38	Holistic Industries, Inc	MR28260 5	MRR206761	Easthampton	\$0.00
39	Holland Brands SB, LLC	MR28473 	MRR206765	Boston	\$0.00



		3			
40	Holyoke Smokes Corp	MD1284	MDR272568	Holyoke	\$0.00
41	Ideal Craft Cannabis, Inc.	MP282007	MPR244048	Uxbridge	\$0.00
42	Ideal Craft Cannabis, Inc.	MC28328 6	MCR140572	Uxbridge	\$0.00
43	In Good Health, Inc.	MC28127 3	MCR140648	Brockton	\$0.00
44	In Good Health, Inc.	MP281307	MPR244107	Brockton	\$0.00
45	JOLO CAN LLC	MR28130 8	MRR206731	Chelsea	\$0.00
46	JOLO CAN LLC	MP281369	MPR244116	Chelsea	\$0.00
47	JOLO CAN LLC	MC28150 2	MCR140630	Chelsea	\$0.00
48	Kaycha MA, LLC	IL281349	ILR267932	Natick	\$0.00
49	Leaf Joy, LLC	MR28460 6	MRR206745	Gill	\$0.00
50	Lunar Xtracts, Inc.	MP282247	MPR244103	Taunton	\$0.00
51	M3 Ventures, Inc.	MR28235 0	MRR206703	Mashpee	\$0.00
52	MA Craft Cultivation LLC	MC28354 9	MCR140660	Colrain	\$0.00
53	Mass Tree Holdings, LLC	MC28370 9	MCR140672	Rutland	\$0.00
54	Mayflower Medicinals, Inc.	MC28269 0	MCR140638	Fall River	\$0.00
55	Natural Agricultural Products, LLC	MR28417 7	MRR206696	Abington	\$0.00
56	New Dia Fenway LLC	MR28422 2	MRR206763	Boston	\$0.00
57	New Dia, LLC	MR28126 9	MRR206734	Worcester	\$0.00
58	Northeast Alternatives, Inc.	MR28274 3	MRR206760	Seekonk	\$0.00
59	Northeast Select Harvest Corp.	MR28257 1	MRR206739	Somerville	\$0.00
60	Nova Farms, LLC	MR28137 9	MRR206742	Attleboro	\$0.00
61	Patriot Care Corp	MR28128 4	MRR206720	Boston	\$0.00
62	Pharmacannis Massachusetts, Inc.	MR28343 6	MRR206771	Newton	\$0.00
63	Pioneer Valley Extracts, Inc.	MP281417	MPR244097	Northampton	\$0.00
64	Power Fund Operations	MC28135 9	MCR140643	Orange	\$0.00
65	Pure Industries, Inc.	MC28141 	MCR140656	Lowell	\$0.00



		1			
66	Regenerative LLC	MC282958	MCR140647	Uxbridge	\$0.00
67	Resinate, Inc.	MR282398	MRR206726	Northampton	\$0.00
68	Resinate, Inc.	MR281249	MRR206747	Worcester	\$0.00
69	Richards Flowers LLC	MB282225	MBR169318	Framingham	\$0.00
70	Sanctuary Medicinals, Inc.	MR281950	MRR206769	Brookline	\$0.00
71	Sanctuary Medicinals, Inc.	MR284210	MRR206770	Woburn	\$0.00
72	Simply Lifted, INC	MB169328	MBR169328	Middleborough	\$0.00
73	Slang, Inc.	MR281402	MRR206728	Pittsfield	\$0.00
74	Speedy Cannabis, LLC	MD1295	MDR272563	Fitchburg	\$0.00
75	Temescal Wellness of Massachusetts, LLC	MR282033	MRR206713	Framingham	\$0.00
76	The Fresh Connection Boston LLC	MC281442	MCR140657	Fitchburg	\$0.00
77	The Green Lady Dispensary, Inc.	MR281427	MRR206695	Nantucket	\$0.00
78	The Green Lady Dispensary, Inc.	MP281345	MPR244092	Nantucket	\$0.00
79	The Green Lady Dispensary, Inc.	MC281443	MCR140626	Nantucket	\$0.00
80	The Harvest Club, LLC	MR284103	MRR206753	Somerville	\$0.00
81	The Verb is Herb, LLC.	MR281637	MRR206671	Easthampton	\$0.00
82	Tower Three, LLC	MC281652	MCR140670	Taunton	\$0.00
83	Tradesman Exchange LLC	MD1316	MDR272566	Mashpee	\$0.00
84	Twisted Growers LLC	MP281909	MPR244096	Lakeville	\$0.00
85	Twisted Growers LLC	MC281714	MCR140632	Lakeville	\$0.00
86	TYCA Green	MR282035	MRR206740	Clinton	\$0.00
87	TYCA Green	MP281555	MPR244120	Clinton	\$0.00
88	UC Cultivation, LLC	MC283608	MCR140663	Ashby	\$0.00
89	VanGarden Cannabis, LLC	MP281365	MPR244082	Leicester	\$2,440.72
90	VanGarden Cannabis, LLC	MC281487	MCR140608	Leicester	\$2,440.72
					



91	Verdant Reparative, Inc.	MR28275 2	MRR206552	Boston	\$0.00
92	Verdant Reparative, Inc.	MP282085	MPR244070	Boston	\$0.00
93	Wellness Connection of MA, Inc	MR28197 1	MRR206729	Revere	\$0.00
94	West County Collective	MC28151 2	MCR140671	Pittsfield	\$0.00
95	Wiseacre Farm Inc.	MC28140 6	MCR140640	West Stockbridge	\$9,684.00

2. All licensees have submitted renewal applications pursuant to 935 CMR 500.103(4) which include the licensee's disclosure of their progress or success towards their Positive Impact and Diversity Plans.
3. All licensees have submitted documentation of good standing from the Secretary of the Commonwealth, Department of Revenue, and Department of Unemployment Assistance, if applicable.
4. All licensees have paid the appropriate annual license fee.
5. The licensees, when applicable, have been inspected over the previous year. Commission staff certify that, to the best of our knowledge, no information has been found that would prevent renewal of the licenses mentioned above pursuant to 935 CMR 500.450.

### **RECOMMENDATION**

Commission staff recommend review and decision on the above-mentioned licenses applying for renewal, and if approved, request that the approval be subject to the licensee remaining in compliance with the Commission regulations and applicable law.





## Medical Marijuana Treatment Center Renewals

### Executive Summary

Commission Meeting: February 8, 2024

#### RENEWAL OVERVIEW

1. Name, license number, location(s), for each Medical Marijuana Treatment Center presented for renewal:

	Licensee Name	License Number	Location (Cultivation)	Location (Dispensing)
96	1622 Medical, LLC	RMD1666	Weymouth	Weymouth
97	Mass Alternative Care, Inc.	RMD726	Chicopee	Chicopee
98	PharmaCannis Massachusetts, Inc.	RMD3045	Holliston	Shrewsbury
99	The Green Lady Dispensary, Inc.	RMD885	Nantucket	Nantucket

2. All licensees have submitted renewal applications pursuant to 935 CMR 501.103.
3. All licensees have paid the appropriate annual license fee.
4. The licensees, when applicable, have been inspected over the previous year. Commission staff certify that, to the best of our knowledge, no information has been found that would prevent renewal of the licenses mentioned above pursuant to 935 CMR 501.450.

#### RECOMMENDATION

Commission staff recommend review and decision on the above-mentioned licenses applying for renewal, and if approved, request that the approval be subject to the licensee remaining in compliance with the Commission regulations and applicable law.





## Aura Cannabis Company, LLC

MR282487

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Aura Cannabis Company, LLC  
320 Airport Road, Fall River, MA 02720

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

Retail

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

Type	Status	Location
Cultivation, Tier 3/Indoor (10,001 – 20,000 sq. ft.)	Provisional License	Fall River
Cultivation, Tier 3/ Indoor (10,001 – 20,000 sq. ft.)	Application Submitted	Fall River

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on August 11, 2022.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): January 9, 2024.





9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.

c. Retail Operation

Enforcement staff verified that all retail-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Verification of identifications for access;
- ii. Layout of the sales floor; and
- iii. Availability and contents of adult-use consumer education materials.

d. Transportation

The licensee will not be performing transportation activities at this time.

**RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:





1. The licensee may possess and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Marijuana Establishments, or to consumers, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.





## **Cannabis Connection II, Inc.**

MR284816

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Cannabis Connection II, Inc.  
1102 Riverdale Street, Unit 2, West Springfield, MA 01089

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

Retail

3. The licensee 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 license under the name of Cannabis Connection, Inc.

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on July 13, 2023.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): January 9, 2024.





9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.

c. Retail Operation

Enforcement staff verified that all retail-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Verification of identifications for access;
- ii. Layout of the sales floor; and
- iii. Availability and contents of adult-use consumer education materials.

d. Transportation

The licensee will not be performing transportation activities at this time.

**RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:





1. The licensee may possess and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Marijuana Establishments, or to consumers, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.





**Diem Orange, LLC**  
MP281684

**ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Diem Orange, LLC  
207 Daniel Shays Hwy, Orange, MA 01364

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

Product Manufacturing

3. The licensee 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.)	Provisional License	Orange

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use cultivation application, retail and marijuana transporter with other existing ME licenses under the names of TDMA, LLC, Diem Lynn, LLC, 3 Quabbin Orange, LLC, and DM Distribution, LLC.

**LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on February 6, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

**INSPECTION OVERVIEW**





8. Commission staff inspected the licensee's facility on the following date(s): January 4, 2024.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.

c. Product Manufacturing Operation

Enforcement staff verified that all manufacturing-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Proposed product compliance; and
- ii. Safety, sanitation, and security of the area and products.

d. Transportation

The licensee will not be performing transportation activities at this time.

**RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:





1. The licensee may possess, prepare, produce, and otherwise acquire marijuana, but shall not sell, or otherwise transport marijuana to other Marijuana Establishments, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.





**Grassp Ventures, LLC**  
MD1262

**ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Grassp Ventures, LLC  
45 Congress St., Building 4, Salem, MA 01970

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

Marijuana Delivery Operator

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

Type	Status	Location
Marijuana Courier Pre-Certification	Application Submitted	N/A

**LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on November 18, 2021.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

**INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): November 22, 2023.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as





applicable.

10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.

c. Transportation

Enforcement staff verified that all transportation-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Vehicle and staffing requirements;
- ii. Communication and reporting requirements; and
- iii. Inventory and manifests requirements.

**RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:

1. The licensee may acquire, possess, and warehouse marijuana products but shall not sell or deliver marijuana products to consumers, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.





4. The licensee shall cooperate with and provide information to Commission staff.
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.





## **Greener Leaf, Inc.**

MR281790

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Greener Leaf, Inc.  
95 Rhode Island Avenue, Fall River, MA 02724

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

Retail

3. The licensee 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.

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on April 4, 2019.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): January 3, 2024.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.





10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.

11. Specific information from Commission staff's inspection is highlighted below:

a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.

c. Retail Operation

Enforcement staff verified that all retail-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Verification of identifications for access;
- ii. Layout of the sales floor; and
- iii. Availability and contents of adult-use consumer education materials.

d. Transportation

The licensee will not be performing transportation activities at this time.

**RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:

1. The licensee may possess and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Marijuana Establishments, or to consumers, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.





3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.





## **R and R Ventures, LLC**

MB281504

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

R and R Ventures, LLC  
d/b/a: R and R Cannabis  
700 South Main Street, Sheffield, MA 01257

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

Microbusiness (Cultivation and Product Manufacturing Operations)

3. The licensee 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.

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on April 16, 2021.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): December 19, 2023.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as





applicable.

10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.

c. Cultivation Operation

Enforcement staff verified that all cultivation operations were in compliance with the Commission's regulations. Some of the requirements verified include the following:

- i. Seed-to-sale tracking;
- ii. Compliance with applicable pesticide laws and regulations; and
- iii. Best practices to limit contamination.

d. Product Manufacturing Operation

Enforcement staff verified that all manufacturing-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Proposed product compliance; and
- ii. Safety, sanitation, and security of the area and products.

e. Transportation





Enforcement staff verified that all transportation-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Vehicle and staffing requirements;
- ii. Communication and reporting requirements; and
- iii. Inventory and manifests requirements.

## **RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:

1. The licensee may cultivate, harvest, possess, prepare, produce, and otherwise acquire marijuana, but shall not sell, or otherwise transport marijuana to other Marijuana Establishments, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.





## **The Holistic Concepts, Inc.**

MR283012

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

The Holistic Concepts, Inc.  
1915 Main St., Brockton, MA 02301

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

Retail

3. The licensee 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 license under the name of 220 Oneil, LLC.

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on August 6, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): December 15, 2023.





9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.

c. Retail Operation

Enforcement staff verified that all retail-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Verification of identifications for access;
- ii. Layout of the sales floor; and
- iii. Availability and contents of adult-use consumer education materials.

d. Transportation

The licensee will not be performing transportation activities at this time.

**RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:





1. The licensee may possess and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Marijuana Establishments, or to consumers, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.





## **Tree Market Lynn, LLC**

MR282587

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Tree Market Lynn, LLC  
d/b/a Greatest Hits  
100 Ford Street, Lynn, MA 01904

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

Retail

3. The licensee 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 cultivation, product manufacturing, and retail licenses under the names of Tree Market Taunton, LLC, DMA Holdings (MA), LLC and Fish Road, LLC.

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on November 19, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**





8. Commission staff inspected the licensee's facility on the following date(s): January 4, 2024.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.

c. Retail Operation

Enforcement staff verified that all retail-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Verification of identifications for access;
- ii. Layout of the sales floor; and
- iii. Availability and contents of adult-use consumer education materials.

d. Transportation

The licensee will not be performing transportation activities at this time.

**RECOMMENDATION**





Commission staff recommend final licensure with the following conditions:

1. The licensee may possess and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Marijuana Establishments, or to consumers, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.





## **Underground Legacy Social Club, LLC**

MR284914

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Underground Legacy Social Club, LLC  
d/b/a Underground Legacy, LLC  
1379-1385 Blue Hill Ave., Boston, MA 02131

2. Type of final license sought (if cultivation, its tier level and outside/inside operation):

Retail

3. The licensee 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 cultivation, product manufacturing, and retail licenses under the names of Cadella, LLC, Northampton Enterprises, Inc., and VanGarden Cannabis, LLC.

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on October 12, 2023.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**





8. Commission staff inspected the licensee's facility on the following date(s): January 17, 2024.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

a. Security

Enforcement staff verified that all security-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. The security of all entrances and exits;
- ii. Visitor procedures;
- iii. Limited access areas;
- iv. Verification of a primary and back-up security company;
- v. Presence of perimeter and duress alarms; and
- vi. All cameras complied with Commission requirements.

b. Inventory and Storage

Enforcement staff verified that all inventory-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Secure storage of marijuana and marijuana products;
- ii. Sanitation and pest control measures; and
- iii. Inventory controls and procedures.

c. Retail Operation

Enforcement staff verified that all retail-related requirements were in full compliance with Commission regulations. Some of the requirements verified include the following:

- i. Verification of identifications for access;
- ii. Layout of the sales floor; and
- iii. Availability and contents of adult-use consumer education materials.

d. Transportation

The licensee will not be performing transportation activities at this time.

**RECOMMENDATION**





Commission staff recommend final licensure with the following conditions:

1. The licensee may possess and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Marijuana Establishments, or to consumers, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

The licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Therefore, the licensee is recommended for final licensure.

As part of the approval of final licensure, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.





**Chill & Bliss, LLC**  
MRN284916

**APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Chill & Bliss, LLC  
356 South Avenue, Units 5A and 5B, Whitman, MA 02382

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 two (2) times 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 license are also associated with other adult-use cultivation, product manufacturing, retail marijuana delivery applications under the names of Fusion Drop, LLC, Soulflower Express, LLC and Crafted Cannabis, LLC.

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

Individual	Role
Kimberly Wall	Person Having Direct/Indirect Control

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

Entity	Role
WallCare, LLC	Entity Having Direct/Indirect Control

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





6. Applicant's priority status:  
Expedited Applicant (Woman-Owned Business)
7. The applicant and municipality executed a Host Community Agreement on January 10, 2023.
8. The applicant conducted a community outreach meeting on April 3, 2023 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the City/Town of Whitman on January 11, 2024 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	Provide at least 5 Massachusetts residents per year who have past drug convictions or who have parents or spouses who have had drug convictions with education and support relating to sealing criminal records to reduce barriers to entry in the cannabis industry and the workforce in general.

### **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	7:00 a.m. to 10:00 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 veterans (10%), people with disabilities (15%), LGBTQ+ (15%), women, (50%), people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people (20%) for its hiring initiatives.
2	Contract with minority-owned (5%), women-owned (5%), veteran-owned (5%), LGBTQ-owned (5%), and disability-owned (5%) businesses for its contractor, subcontractor and supplier needs.

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. The applicant shall cooperate with and provide information to Commission staff.
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.





## Faded Flowers, LLC

MCN283840

### APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Faded Flowers, LLC  
d/b/a Faded Flowers  
18 Baystate Drive, Chester, MA 01011

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

Cultivation, Tier 1/Indoor (up to 5,000 sq. ft.)

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):

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

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

Individual	Role
Raymond Shehata	Person Having Direct/Indirect Control
Sherif Osman	Person Having Direct/Indirect Control
Ahmed Metwally	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:

Expedited Applicant (Veteran-Owned Business)

7. The applicant and municipality executed a Host Community Agreement on August 22, 2023.





8. The applicant conducted a community outreach meeting on August 22, 2023 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the City/Town of Chester on December 21, 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 20% of individuals who are residents of Pittsfield and Greenfield, Massachusetts residents who have past drug convictions and Massachusetts residents with parents or spouses who have drug convictions.
2	Provide 2.5% of its net profits to New England Adventures to veterans who are Massachusetts residents and have past drug convictions.

#### **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 three (3) 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	9:00 a.m. to 5:00 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 veterans (50%), minorities (25%), women (25%), persons with disabilities (25%), individuals who identify as LGBTQ+ (25%) for its hiring initiatives.
2	Contract with veterans (50%), minorities (25%), women (25%), persons with disabilities (25%), individuals who identify as LGBTQ+ (25%) for the provision of services required for the operation and maintenance of the Applicant's marijuana establishment.

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. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.
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.





## Medicine Man Solutions, LLC

MRN283261

### APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Medicine Man Solutions  
446 Winthrop Street, Taunton, MA 02780

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 three (3) 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
Marijuana Delivery Operator	Provisional License	Taunton
Marijuana Courier	Pre-Certification	N/A

Please note that individuals and/or entities associated with the proposed license are also associated with an adult-use product manufacturing license under the name of Medicine Man Solutions.

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

Individual	Role
Haskell Kennedy	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:





Expedited Applicant (Social Equity Program Participant)  
(Haskell Kennedy / 100% ownership / SE304323)

7. The applicant and municipality executed a Host Community Agreement on January 6, 2023.
8. The applicant conducted a community outreach meeting on October 3, 2023 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the City/Town of Taunton on January 4, 2024 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 50% of its workforce from target areas of Taunton, New Bedford, and surrounding areas, and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions.
2	Provide industry-specific training quarterly.
3	Provide open access to expert, proactive, post-seminar mentorship and counseling, access to resource center providing links and information of use to both entrepreneurs from Target Areas.
4	Promote participation from Target Areas in a wide-reaching quarterly survey designed to identify and overcome the obstacles to success in the industry.

### **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 seven (7) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Saturday	8:00 a.m. – 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 minorities (40%); women (20%); veterans (20%); persons with disabilities (10%); and LGBTQ+ (10%) for its hiring initiatives.
2	Employ the mentor-to-mentee program with the opportunities for all diverse demographics to have the opportunity to shadow their immediate supervisor to help achieve a transfer of the skills, knowledge, and responsibilities that their role demands

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

The applicant plans to obtain marijuana from its affiliated licenses. If the need arises, 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 ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.
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.





## **Melting Pot Manufacturing, Inc.**

MPN281882

### **APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Melting Pot Manufacturing, Inc.  
321 West Grove St, Floor 2, Unit 1, Middleborough, MA 02346

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

Product Manufacturing

The application was reopened two (2) times 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 license are also associated with an adult-use marijuana delivery license under the name of Gas Bus, LLC.

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

Individual	Role
Edson Charles	Person Having Direct/Indirect Control
Richard DeCotis	Person Having Direct/Indirect Control
Melissa Forbes	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 (Social Equity Program Participant)  
(Edson Charles / 67% ownership / SE305106)





7. The applicant and municipality executed a Host Community Agreement on October 23, 2023.
8. The applicant conducted a community outreach meeting on October 26, 2023 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the City/Town of Middleborough on January 2, 2024 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	Partner with the recovery home Quinn House and Peak Recovery Solutions a substance abuse recovery program provider; and provide 20 hours of service to the programs and residence of said program. Part of its service will be two full day sessions, twice a year dedicated to a spring and winter clean-up of the Quinn House property.
2	Work with The Quinn House and Peak Recovery Solutions to identify all qualified applicants. (Any resident with a valid driver license that meets all the Cannabis Control Commissions employment requirements) with the intention of hiring one (1) scholarship recipient from the Quinn house every hiring cycle or every six months and keep one (1) hire from the Quinn house on staff at all times.

### **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 11 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	9:00 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 people of color particularly Black, African American, Hispanic, Latinx, and Indigenous people (50%), Women (15%) Veterans (10%) persons with disabilities (15%) LGBTQ+ people (10%) for its hiring initiatives.
2	Contract with vendors or wholesalers who are people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people (50%) Women (15%) Veterans (10%), persons with disabilities (15%), and LGBTQ+ (10%).

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

#	Product
1	Distillate Vape
2	Infused Pre-rolls

## **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. 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.





## Pure Tewksbury, Inc.

MRN284994

### APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Pure Tewksbury, Inc.  
d/b/a Smyth Cannabis Co.  
1695 Shawsheen St, Tewksbury, MA

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):

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

Please note that individuals and/or entities associated with the proposed license are also associated with other adult-use cultivation, product manufacturing, retail licenses under the names of Pure Industries, Inc. and Pure Lowell, Inc.

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

Individual	Role
Todd Brady	Person Having Direct/Indirect Control
James Statires	Person Having Direct/Indirect Control
Andrew Statires	Person Having Direct/Indirect Control

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

Entity	Role
PI MA Holdings, Inc.	Entity Having Direct/Indirect Control

6. Applicant's priority status:





## General Applicant

7. The applicant and municipality executed a Host Community Agreement on October 31, 2023.
8. The applicant conducted a community outreach meeting on September 18, 2023 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the City/Town of Tewksbury on December 12, 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	Conduct at least two (2) one-hour industry-specific educational seminars in the City of Lowell annually with a goal of having at least 25 people in attendance at each seminar.
2	Provide an annual donation of \$5,000 to the Old Colony YMCA. Due to the nature of the business, any charitable funds Old Colony YMCA receives will be restricted for the sole purpose of providing services and treatment to those affected by substance abuse. Funds contributed will be earmarked for use in the Disproportionately Impacted Areas of Brockton, Lowell, and Taunton.

## **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 eight (8) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Saturday	9:00 a.m. to 10:00 p.m.
Sunday	10:00 a.m. to 10:00 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 30% women (30%), people of color (20%), veterans (5%), individuals who identify as LGBTQ+ (5%) and persons with disabilities (5%) for its hiring initiatives.
2	Working with MakeIT Haverhill to participate in at least two (2) career day programs throughout the year

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

The applicant plans to obtain marijuana from its affiliated licenses. If the need arises, 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 ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.
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.





**The Copley Connection, LLC**  
MRN284935

**APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Copley Connection, LLC  
d/b/a The Copley Connection  
551 Boylston St., Boston, MA 02116

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 three (3) times 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.

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

Individual	Role
Senam Kumahia	Person Having Direct/Indirect Control
Joshua Zakim	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:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on March 6, 2023.





8. The applicant conducted a community outreach meeting on October 9, 2023 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the City/Town of Boston on December 26, 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 16-20 individuals who are residents of Boston, specifically, census tracts 80300, 80401, 80601, 90100, 90200, 90300, 90400, 91200, 91400, 91700, 91800, 91900, 91200, 101001, 100100, 100200, 100601, 101101, 101102.
2	Donate \$10,000 to Back Bay Association and \$15,000 to The Friends of Copley Square.

### **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:

Day(s)	Hours of Operation
Monday-Sunday	9:00 a.m. to 11:00 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% people of color, 50% women, 10% veterans, 10% LGBTQ+, and 5% people with disabilities for its hiring initiatives.





2	Create a safe, accepting, and respectful environment for all employees, customers, and vendors.
3	Contract with 20% of suppliers and vendors who are people of color, women, veterans, people with disabilities, and people who are members of the LGBTQ+ community.

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. The applicant shall cooperate with and provide information to Commission staff.
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.





## 420 Trainers LLC

DCCN462255

### **RESPONSIBLE VENDOR TRAINING (“RVT”) APPLICANT SUMMARY**

1. Name, address, and contact information of the proposed RVT applicant:

Item	Information
RVT Applicant Name	420 Trainer LLC
RVT Applicant d/b/a Name	N/A
RVT Address	2 Riverbend Drive, Plattsburgh, NY 12901
RVT Business Phone Number	508-981-8644
RVT Business Email Address	<a href="mailto:contact@420trainers.com">contact@420trainers.com</a>
RVT Business Website	<a href="https://www.420trainers.com/">https://www.420trainers.com/</a>

2. The RVT applicant has applied to provide a training program for the Delivery Core Curriculum.
3. No owner, manager, or employee of the RVT applicant is a Person or Entity Having Direct or Indirect Control of a Marijuana Establishment or Medical Marijuana Treatment Center. The following is a list of all required individuals disclosed:

Individual	Role
Danielle Elizabeth	Owner
Robert Jarrard	Employee

### **GENERAL OVERVIEW OF TRAINING PROGRAM**

4. The RVT applicant’s program will be presented in both in-person and virtual / hybrid model.
5. The RVT applicant has demonstrated the following:
- To verify the identification and certify completion of the training program for each agent;
  - To track trainees' time needed to complete the course training;
  - To allow for the trainees to ask questions of the RVT; and
  - To evaluate each trainee's proficiency with course material.





6. The RVT applicant described its plan to maintain its training records at its principal place of business including length of time for retention.
7. The RVT applicant outlined the attendees its training program intends to target, its recruitment approach, and the objectives of its training program.

### **COURSE MATERIALS AND ATTACHMENTS**

8. The RVT applicant submitted following required training and evaluation materials:

Delivery Core Curriculum Materials
1. Safely Conducting Deliveries
2. Safe Cash Handling Practices
3. Strategies for De-escalating Potentially Dangerous Situations
4. Securing Product Following any Instance of Diversion, Theft, or Loss of Finished Marijuana Products
5. Collecting and Communicating Information to Assist in Investigations
6. Procedures for Checking Identification
7. Indications of Impairment
8. Notification to Consumers Regarding Use of Mandatory Recording Devices
9. Testing Materials
10. Evaluation Materials

### **RECOMMENDATION**

Commission staff recommends the RVT applicant listed above be approved for a two-year certification to provide its training program with the following conditions:

1. The RVT applicant shall ensure all training materials reflect current Commission regulations.
2. The RVT applicant shall remain fully compliant with all applicable Commission regulations.

This recommendation is based on the review and evaluations of required materials and information submitted to the Commission.





## Bright Buds Training

DCCN462226

### RESPONSIBLE VENDOR TRAINING (“RVT”) APPLICANT SUMMARY

1. Name, address, and contact information of the proposed RVT applicant:

Item	Information
RVT Applicant Name	Bright Buds Training
RVT Applicant d/b/a Name	N/A
RVT Address	24 East Bowery Street, Newport, RI 02840
RVT Business Phone Number	203-508-0183
RVT Business Email Address	<a href="mailto:molly@brightbudstraining.com">molly@brightbudstraining.com</a>
RVT Business Website	<a href="https://brightbudstraining.com/">https://brightbudstraining.com/</a>

2. The RVT applicant has applied to provide a training program for the Delivery Core Curriculum.
3. No owner, manager, or employee of the RVT applicant is a Person or Entity Having Direct or Indirect Control of a Marijuana Establishment or Medical Marijuana Treatment Center. The following is a list of all required individuals disclosed:

Individual	Role
Molly Dupont	Owner

### GENERAL OVERVIEW OF TRAINING PROGRAM

4. The RVT applicant’s program will be presented in a virtual format model.
5. The RVT applicant has demonstrated the following:
  - a. To verify the identification and certify completion of the training program for each agent;
  - b. To track trainees' time needed to complete the course training;
  - c. To allow for the trainees to ask questions of the RVT; and
  - d. To evaluate each trainee's proficiency with course material.
6. The RVT applicant described its plan to maintain its training records at its





principal place of business including length of time for retention.

7. The RVT applicant outlined the attendees its training program intends to target, its recruitment approach, and the objectives of its training program.

### **COURSE MATERIALS AND ATTACHMENTS**

8. The RVT applicant submitted following required training and evaluation materials:

Delivery Core Curriculum Materials
1. Safely Conducting Deliveries
2. Safe Cash Handling Practices
3. Strategies for De-escalating Potentially Dangerous Situations
4. Securing Product Following any Instance of Diversion, Theft, or Loss of Finished Marijuana Products
5. Collecting and Communicating Information to Assist in Investigations
6. Procedures for Checking Identification
7. Indications of Impairment
8. Notification to Consumers Regarding Use of Mandatory Recording Devices
9. Testing Materials
10. Evaluation Materials

### **RECOMMENDATION**

Commission staff recommends the RVT applicant listed above be approved for a two-year certification to provide its training program with the following conditions:

1. The RVT applicant shall ensure all training materials reflect current Commission regulations.
2. The RVT applicant shall remain fully compliant with all applicable Commission regulations.

This recommendation is based on the review and evaluations of required materials and information submitted to the Commission.





**MACCTI, LLC**  
RVR453145

**RESPONSIBLE VENDOR TRAINING (“RVT”) TRAINER SUMMARY**

1. Name, address, and contact information of the Certified RVT trainer:

Item	Information
RVT Applicant Name	MACCTI, LLC
RVT Certification Number	RV453191
RVT Applicant d/b/a Name	N/A
RVT Address	517 Boston Post Road, Sudbury, MA 01776
RVT Business Phone Number	(617) 383-7717
RVT Business Email Address	<a href="mailto:james@mcmahonstrategic.com">james@mcmahonstrategic.com</a>
RVT Business Website	<a href="https://maccti.com/">https://maccti.com/</a>

2. The RVT trainer has submitted a renewal application to continue to provide a training program for the Basic Core Curriculum.

No owner, manager, or employee of the RVT trainer is a Person or Entity Having Direct or Indirect Control of a Marijuana Establishment or Medical Marijuana Treatment Center. The following is a list of all required individuals disclosed:

Individuals	Role
David Mulville	Owner

Entity	Role
McMahon Strategic Development, LLC	Owner
Stateside Education, LLC	Owner
Kilmoganny Investments, LLC	Owner

**GENERAL OVERVIEW OF TRAINING PROGRAM**

3. The RVT trainer was originally certified on March 10, 2020. Since that time, or the time of its last renewal, the RVT trainer has provided instruction to 841 Marijuana Establishment and Medical Marijuana Treatment Center agents.





4. The RVT trainer's program is presented in a virtual format model.
5. The RVT trainer has continued to demonstrate the following:
  - a. To verify the identification and certify completion of the training program for each agent;
  - b. To track trainees' time needed to complete the course training;
  - c. To allow for the trainees to ask questions of the RVT; and
  - d. To evaluate each trainee's proficiency with course material.

### **RECOMMENDATION**

Commission staff recommends the RVT trainer listed above be approved for renewal for a two-year certification to provide its training program with the following conditions:

1. The RVT trainer shall ensure all training materials reflect current Commission regulations.
2. The RVT trainer shall remain fully compliant with all applicable Commission regulations.

This recommendation is based on the review and evaluations of required materials and information submitted to the Commission.





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## Bulletin – Safe and Sanitary Requirements for the Processing of Marijuana

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**To:** Licensees (Marijuana Establishments, Medical Marijuana Treatment Centers)  
**From:** Investigations and Enforcement Department  
**Date:** February 2, 2024  
**Subject:** Bulletin – Safe and Sanitary Requirements for the Processing of Marijuana

---

This Bulletin applies to licensed Marijuana Establishments and Medical Marijuana Treatment Centers that process Marijuana (collectively the “Licensees”). The Cannabis Control Commission (“Commission”) has received reports regarding the processing of Marijuana in conditions that are unsafe and unsanitary. The Commission has also received reports of inspections and interviews conducted by the Occupational Safety and Health Administration (“OSHA”) at various Licensees’ Premises. The health and safety of Licensees and their agents, Patients, Caregivers, Consumers and the general public is of the utmost important to the Commission. As a result, this Bulletin serves to remind Licensees of their regulatory obligations.

The Commission has promulgated several regulations to set minimum health and safety standards for the processing of Marijuana and the production of Marijuana Products. Pursuant to 935 CMR 500.101(3)(c)3., 935 CMR 501.101(1)(c)14. c., 935 CMR 500.105(1)(r) and 935 CMR 501.105(1)(r), Licensees are responsible for having a safety plan for the manufacture and production of Marijuana Products and written operating policies in line with OSHA standards. Additionally, 935 CMR 500.130(5)(i) and 935 CMR 501.120(13)(f) require Licensees to have written policies for ensuring compliance with the Massachusetts Fire Safety Code when processing Marijuana.

Commission regulations also include safety and sanitation requirements for handling Marijuana. Specifically, 935 CMR 500.105(3)(a) states, in its entirety:

A Marijuana Establishment authorized to Process Marijuana shall do so in a safe and sanitary manner. A Marijuana Establishments shall Process the leaves and flowers of the female Marijuana plant only, which shall be:

1. Well cured and free from seeds and stems;
2. Free of dirt, sand, debris, and other foreign matter;





3. Free of contamination by mold, rot, other fungus, pests and bacterial diseases and satisfying the sanitation requirements in 105 CMR 500.000, and if applicable, 105 CMR 590.000: *State Sanitary Code Chapter X – Minimum Sanitation Standards for Food Establishments*;
4. Prepared and handled on food-grade stainless steel tables with no contact with Licensees' or Marijuana Establishment Agents' bare hands; and
5. Packaged in a secure area.

All Licensees must harvest, dry, cure, trim, and separate parts of the Marijuana plant in a safe and sanitary manner. In other words, Licensees must take into consideration the danger or harm that processing Marijuana may have on the health and safety of employees engaged in those activities, as well as patients and consumers, and take proactive steps to avert that potential harm.

Consistent with that objective, Licensees might also consider taking additional measures and precautions. The Department of Public Health's ("DPH") Fatality Assessment and Control Evaluation ("FACE") report and Occupational Lung Disease Bulletin—along with a Centers for Disease Control and Prevention ("CDC") Morbidity and Mortality Weekly Report— shared the following recommendations:

- Assess and control hazardous materials in the workplace, including Asthmagens.
- Ensure that all workers are properly trained about hazardous materials in the workplace.
- Develop and implement a comprehensive safety and health program that addresses hazard recognition, avoidance of unsafe conditions, and proper use of equipment.
- Ensure the correct use of personal protective equipment by employees.
- Monitor and manage cases of employees with work related symptoms.
- Making adjustments to an employee's job tasks and/or role to help reduce exposure to hazards.

[Read DPH's FACE Report](#)

[Read DPH's Bulletin](#)

[Read CDC's MMWR Report](#)

## Questions?

If you have additional questions, please contact the Commission at (774) 415-0200 or [\*\*Inspections@cccmass.com\*\*](mailto:Inspections@cccmass.com)





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## Memorandum

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**To:** Commissioners  
**Cc:** Debra Hilton-Creek, Acting Executive Director  
**From:** Matt Giancola, Director of Government Affairs and Policy  
**Date:** February 8, 2024  
**Subject:** **February 2024 Government Affairs Update**

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### Legislative Update

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Acting Chair Ava Concepcion, Acting Executive Director Debra Hilton-Creek, and Government Affairs and Policy staff met with Senate Ways and Means Chair Michael Rodrigues and staff to discuss the Commission's FY 2025 budget request.

### Municipal Update

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Acting Chair Ava Concepcion and members of the Government Affairs and Policy, Equity Programming and Community Outreach, and Digital Media teams attended the Annual Massachusetts Municipal Association Conference and spoke with multiple local officials from across the Commonwealth.

### **Municipal Law Unit**

The Attorney General's Municipal Law Unit (MLU) issued [one marijuana-related decision](#) this past month:

Town of Berkley: The MLU endorsed sections of the town's Zoning Bylaws, which were approved by the Town on June 5 and modified by the town on January 6, 2024. In its decision, the MLU commented on additional portions for consideration including highlighted aspects of the Commission's new regulations that deviate from the recodified town by-laws, advising the town to update their language accordingly.





# Cannabis Control Commission

Monthly Public Meeting

February 8, 2024 at 10:00 a.m.  
Via Microsoft Teams





# Agenda

- Call to Order
- Executive Session
- Commissioners' Comments and Updates
- Acting Executive Director and Commission Staff Report
- Staff Recommendations on Changes of Ownership
- Staff Recommendations on Renewals
- Staff Recommendations on Provisional Licenses
- Staff Recommendations on Final Licenses
- Staff Recommendations on Responsible Vendor Training
- Staff Recommendations on Responsible Vendor Training Renewals
- Commission Discussion and Votes
- New Business that the Chair did not Anticipate at the Time of Posting
- Next Meeting Date and Adjournment





**The Commission is  
in Executive Session**



# Commission Updates

- December 2023: Record-breaking sales month for the licensed cannabis industry - \$140.1 Million
- 2023: Record-breaking sales year for the licensed cannabis industry - \$1.57 Billion
- FY 2025 Budget Update:
  - Conducting outreach to Legislators, including the Joint Committee on Ways and Means and Administration officials
  - Final budget likely signed into law in June / July 2024





# FY 2025 Budget Update

- FY 2025 Budget Update: Governor's H.2 Appropriation:
  - 1070-0840 Operations: \$16,519,762
  - 1070-0842 Medical Marijuana Program: \$3,720,038
  - Total: \$20,239,797

Account	Account Title	FY 2024 Total Available Budget	FY 2025 CNB Maintenance	FY 2025 CNB Request
1070-0840	Cannabis Control Commission	\$16,232,004	\$18,952,248	\$20,404,510
1070-0841	Public Education Campaign	\$0	\$0	\$1,500,000
1070-0842	Medical Use of Marijuana Program	\$3,531,738	\$3,694,918	\$3,997,168
	Total:	\$19,763,742	\$22,647,166	\$25,901,678





# Commission Updates

## **Executive Director Search Update**

- Employee Engagement Activities – Nearly 90% participation – MoE ~ 3%
- Draft Recruitment Document – With Commissioners for Review on Friday
- Began 1<sup>st</sup> step in procurement process for external contract

## **Onboarding Key Roles**

- Welcome to our New Team Members!
  - Chief Financial and Accounting Officer (CFAO)
  - Budget Director

## **Organizational Development: Change Management**

- Restructuring Efforts to Maximize Resources and Create Efficiencies
- Making Changes and Staying the Same







# Welcoming Social Equity Program Cohort 4

*Resources, Awareness, and Engagement*

Silea Williams, Director of Equity Programming and Community Outreach  
AnnMarie Burt, Director of Digital and Creative Services  
Maryalice Curley, Director of Communications





# Agenda

- I. Social Equity Program Overview
- II. Faces of Equity Public Awareness Campaign
- III. Earned Media
- IV. Community Outreach



# Social Equity Program (SEP)

- The Social Equity Program (SEP) creates sustainable pathways into the cannabis industry for individuals most impacted by the War on Drugs, marijuana prohibition, disproportionate arrest, and incarceration.
- The SEP seeks to provide participants with education, skill-based training, and tools for success in the industry across four areas: entrepreneurship, managerial-level workforce development, re-entry and entry-level workforce development, and ancillary business support.
- Upon completion of this program, participants will have acquired tools and training to apply for and obtain a license through the Cannabis Control Commission. However, completion of the program does not guarantee licensure.





# Our Team



Cedric Sinclair, Chief Communications Officer



Silea Williams, Director of Equity Programming & Community Outreach



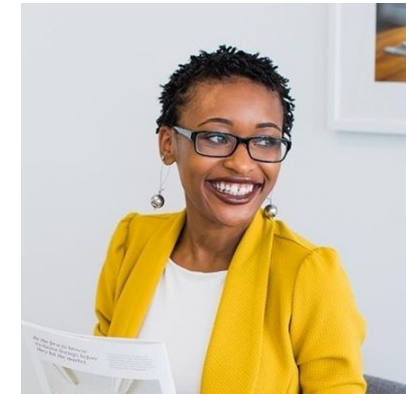
Alkia Powell, Manager of Community Outreach



Darrus Sands, Manager of Equity Programming & Strategic Partnerships



Steven Carosello, Project Coordinator



Akilah Armstrong, Project Coordinator





# Department Overview

- We promote the inclusion of communities disproportionately harmed by marijuana arrests and incarceration into the cannabis industry through:
  - Community outreach initiatives, to disadvantages groups and industry stakeholders, including providing industry updates, educational resources, additional resources, training opportunities and consultations with state agencies
  - Strategic Partnerships engagement, to increase our reach to women, veterans and racial minority populations
  - Recruitment of minority-owned, women-owned and Veteran owned business enterprises to become licensed
  - Equity Programming, the development of our technical assistance and training platform, the Social Equity Program
- The Social Equity Program (SEP)
  - First statewide social equity program of its kind in the Nation;
  - To date, 872 participants have been accepted into the program.
  - Applications for Cohort IV
    - Opens Monday, February 5<sup>th</sup>, 2024
    - Closes Tuesday, April 30<sup>th</sup> , 2024
    - The application review and acceptance period will end on May 31st, 2024.





# Social Equity Program Overview

- The SEP creates sustainable pathways into the cannabis industry for individuals most impacted by marijuana prohibition, disproportionate arrests, and incarceration
- Programming caters to a variety of interests, such as:
  - Entrepreneurs who are pursuing various cannabis licenses
  - Ancillary business owners who focus on non-licensed activities
  - Prospective Registered Agents seeking both entry and managerial level workforce opportunities
- The program does this by providing participants with education, skill-based training, and tools for success in the industry across four program tracks:
  - Entrepreneur
  - Ancillary
  - Entry & Re-Entry
  - Core
- Please note: This is not a license type and completion of the program does not guarantee licensure





# Updated Coursework

- In 2022 “Predatory Lending”, “Raising Capital” courses and Delivery sub-track were added to curriculum.
- In 2023 10 Advanced Universal Courses were added to the curriculum.
- Pending final Regulations and Implementation we will update and add the following courses;
  - Host Community Agreements
  - Municipal Process
  - Delivery Sub-Track
  - Social Consumption Sub-Track





# Social Equity Program Track Overview

Each track is comprised of several individual and skills-based courses which encompass a complete curriculum.



## Entrepreneur

Those seeking licensure and ownership.

Sub-tracks based on participant interest:



All Entrepreneur Track participants take Universal Courses, followed by courses specific to their sub-track.



## Core

Those interested in cannabis careers at Marijuana Establishments at the managerial and executive level.

All Core Track Participants take Universal Courses, followed by courses specific to managerial and executive level opportunities.



## Entry

Those interested in entry level positions or starting careers at Marijuana Establishments.

All Entry Track Participants are encouraged to take Universal Courses.



## Ancillary

Those with existing skills that are directly transferable to working with or supporting cannabis businesses.





# Social Equity Program Eligibility

Applicants are eligible for the social equity program if they demonstrate at least one of the following criteria:

**#1**

Income that does not exceed 400% of Area Median Income and Residency in an Area of Disproportionate Impact, as defined by the Commission, for at least five of the past ten years;

**#2**

Residency in Massachusetts for at least the past 12 months and a conviction or continuance without a finding for an offense under M.G.L. c. 94C or an equivalent conviction in Other Jurisdictions;

**#3**

Residency in Massachusetts for at least the past 12 months and proof that the applicant was either married to or the child of an individual convicted or continuance without a finding for a M.G.L. c. 94C offense or an equivalent conviction in Other Jurisdictions;

**#4**

Any individual listed as an owner on the original certification of an Economic Empowerment Priority Applicant.





# Strategic Partnerships



## **Archipelago Strategies Group**

- Creative Strategy and Content Development
- FY '22 Budget: \$4,175
- FY '23 Budget: \$249,805
- FY '24 Budget: \$19,905



## **Buyer Advertising**

- Media Strategy and Placement
- FY '24 Budget: \$351,145

**Total Campaign Spend: \$625,030**



# The Faces of Equity Public Awareness Campaign

- Integrated Multimedia Campaign
- Designed to communicate the Commission's equity mission, policies, and programming using the voices and profiles of actual participants and industry agents
- How the program has produced real benefits and life-changing opportunities for those who have been most harmed by the War on Drugs.

## Campaign Goals:

- Raise awareness of the Commission's equity programming
- Recruit for Cohort 4 of the Social Equity Program
- Inspire potential applicants to visualize themselves as participants who can obtain success for themselves and their families within the legal cannabis industry





# Creative Collateral

## Externally Developed

- Feature Videos
  - 10min Mini-Documentary
  - 5 2:30m Personal Stories
- Advertising
  - Digital and Print
  - Social Media
  - Broadcast Radio
  - Live DJ Reads
  - Bus Shelters

## Internally Developed

- Website
- Email Blasts
- 5 :30 Feature Videos
- Tutorial Videos
- Social Media Posts
- Rack Cards







# Faces of Equity

Empowering the Commonwealth  
through Cannabis Legalization







# Digital Ads



**Inequity.  
Opportunity.**

Learn more about the Commonwealth's equity programming. [Click here.](#)





**Marginalized.  
Manager.**

Learn more about the Social Equity Program. [Click here.](#)





**Roadblocks.  
Career Paths.**

Learn more about the Social Equity Program. [Click here.](#)





**Barriers.  
Breakthroughs.**

Learn more about the Social Equity Program. [Click here.](#)





**Excluded.  
Empowered.**

Learn more about the Social Equity Program. [Click here.](#)



# Print Ads



**Make your community  
your business**

Massachusetts' Social Equity Program (SEP) provides free technical assistance and training for pathways into the legal cannabis industry for individuals most impacted by the War on Drugs. Offered statewide by the Cannabis Control Commission, SEP delivers education and tools for success as an entrepreneur, manager, entry-level employee, and vendor or ancillary business. SEP does not guarantee licensure; however, Participants will receive access to training and technical assistance to help with the state's application process and business development.

To learn more about the Commonwealth's equity programming, visit [masscannabiscontrol.com/eq](#)





**Cultivating careers,  
empowering communities**

Massachusetts' Social Equity Program (SEP) provides free technical assistance and training for pathways into the legal cannabis industry for individuals most impacted by the War on Drugs. Offered statewide by the Cannabis Control Commission, SEP delivers education and tools for success as an entrepreneur, manager, entry-level employee, and vendor or ancillary business. SEP does not guarantee licensure; however, Participants will receive access to training and technical assistance to help with the state's application process and business development.

To learn more about the Social Equity Program, visit [masscannabiscontrol.com/eq](#)





**Transition  
your legacy  
skills to the  
legal market**

Massachusetts' Social Equity Program (SEP) provides free technical assistance and training for pathways into the legal cannabis industry for individuals most impacted by the War on Drugs. Offered statewide by the Cannabis Control Commission, SEP delivers education and tools for success as an entrepreneur, manager, entry-level employee, and vendor or ancillary business. SEP does not guarantee licensure; however, Participants will receive access to training and technical assistance to help with the state's application process and business development.

To learn more about the Social Equity Program, visit [masscannabiscontrol.com/equity](#)





**Your past is an asset**

Massachusetts' Social Equity Program (SEP) provides free technical assistance and training for pathways into the legal cannabis industry for individuals most impacted by the War on Drugs. Offered statewide by the Cannabis Control Commission, SEP delivers education and tools for success as an entrepreneur, manager, entry-level employee, and vendor or ancillary business. SEP does not guarantee licensure; however, Participants will receive access to training and technical assistance to help with the state's application process and business development.

To learn more about the Social Equity Program, visit [masscannabiscontrol.com/eq](#)





**Plant seeds and  
grow your network**

Massachusetts' Social Equity Program (SEP) provides free technical assistance and training for pathways into the legal cannabis industry for individuals most impacted by the War on Drugs. Offered statewide by the Cannabis Control Commission, SEP delivers education and tools for success as an entrepreneur, manager, entry-level employee, and vendor or ancillary business. SEP does not guarantee licensure; however, Participants will receive access to training and technical assistance to help with the state's application process and business development.

To learn more about the Social Equity Program, visit [masscannabiscontrol.com/eq](#)

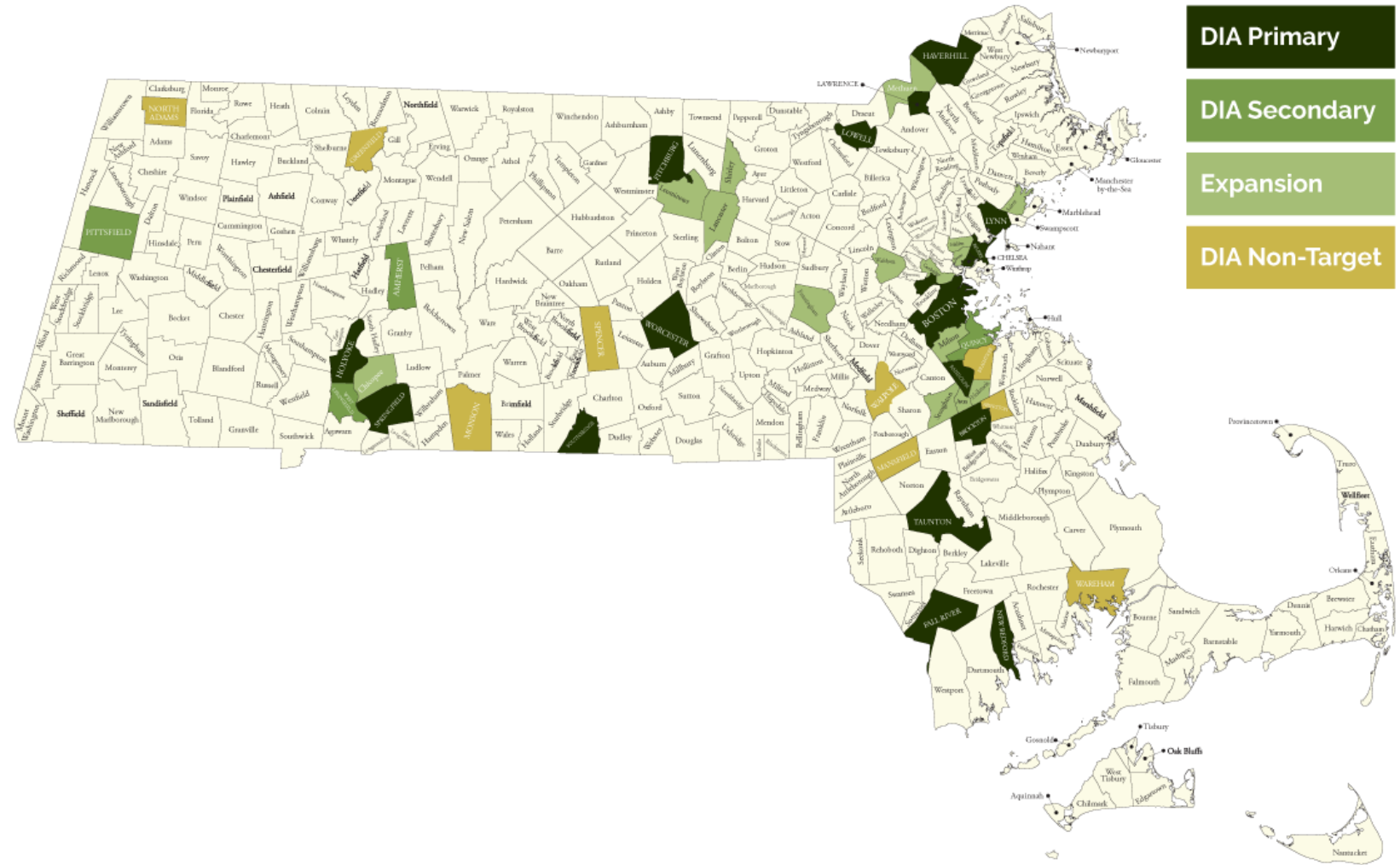






# Geotargeting

- Media placements focused on a mix of DIA communities and the 25 Most Diverse Communities in Massachusetts
- Categorized DIA communities into Primary, Secondary, and Non-Target
- Non-DIA Diverse Communities Added as Areas of Expansion



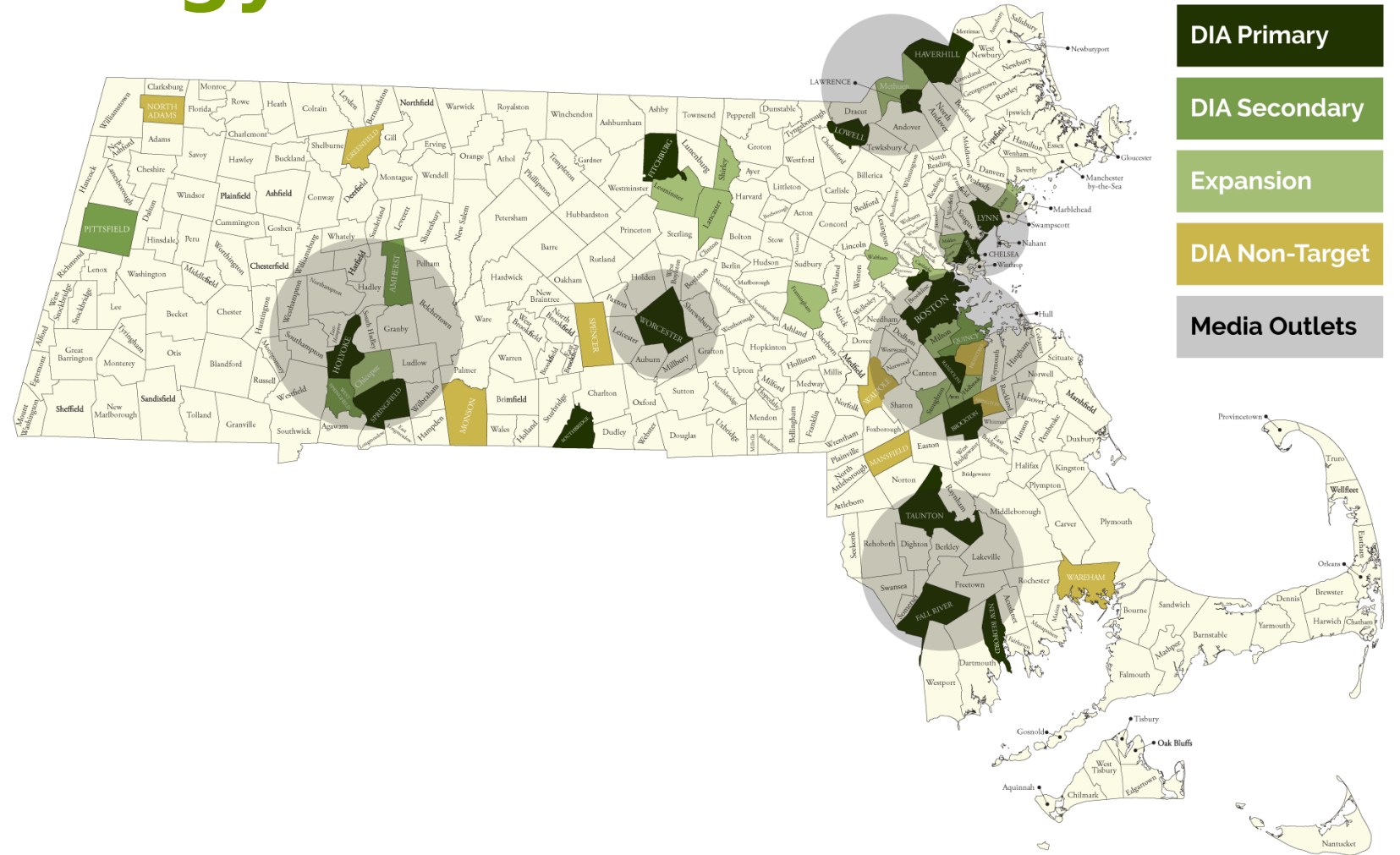


# Media Buy Strategy

- Focused on media outlets serving communities within our identified geotargeting

Digital, Print, and  
Broadcast Radio  
Bus Shelters

- Social Media, IP Targeted Banner Ads, and Streaming Audio spans State-wide
- Ads in English and Spanish





# Campaign Timeline

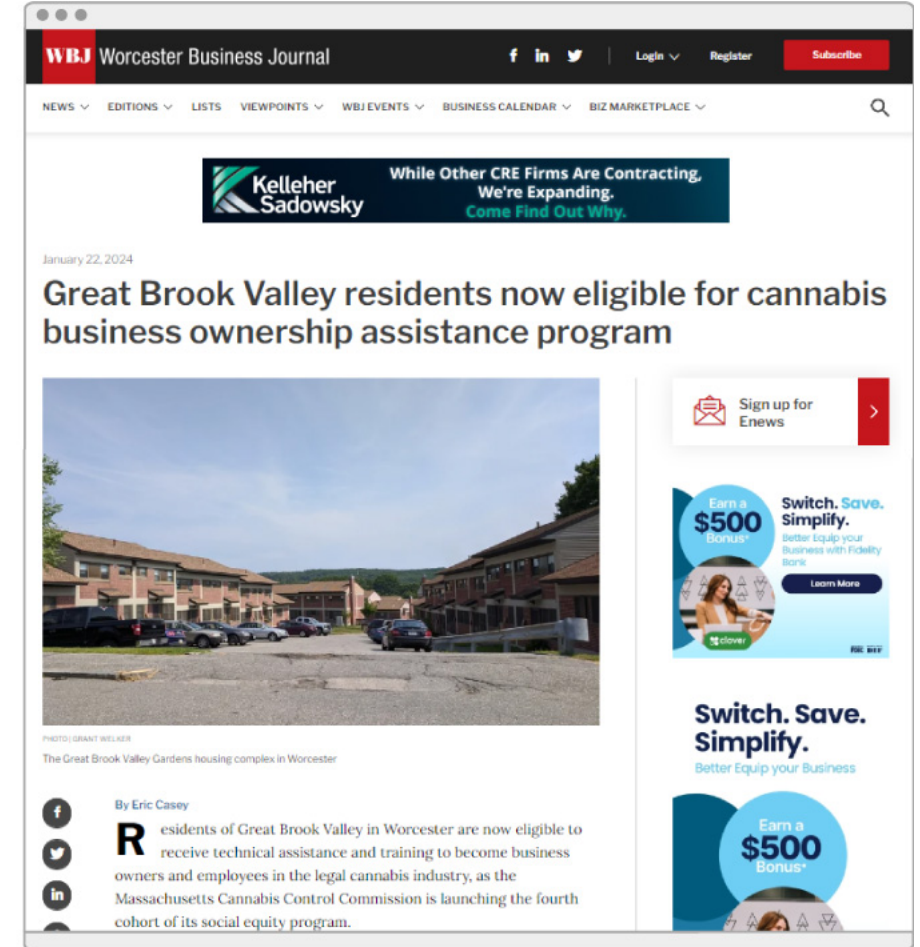
Content	Dates
Email Drip Campaign	January 16 – February 5
Website	January 16 – April 30
Digital Ads	January 22 - April
Print Ads	January 25 – April 11
Radio Ads	January 21 – April 6
Social Media Ads	February – April
Social Media Posts	February 5 – April 29
Bus Shelters	February 26 – March 24





# Earned Media

- Following the January public meeting, the Communications team distributed a press release with additional information about Cohort 4
- Media outreach has begun and will continue through the application deadline of April 30
- Print, broadcast, and radio interview opportunities throughout the Commonwealth will bring awareness to the Commission's equity mission, policies, and programming
- Regional focus will prioritize diverse, disproportionately impacted coverage areas, and ethnic and community media outlets





# Earned Media

- Cohorts 1-3 Participants and other equity ambassadors are invited to get involved to educate peers and the public about opportunities and benefits
- Organic social media posts will be scheduled across Commission channels through April 30 distributing externally and internally developed content
- Find us on the following platforms to stay informed about outreach activities and to share information with your networks:
  - @MA\_Cannabis on X
  - MassCCC on Facebook
  - Cannabis Control Commission on LinkedIn
  - CannabisControlCommission on Instagram
- Contact [Press@CCCMass.com](mailto:Press@CCCMass.com) to help us spread the word about Cohort 4.





# Community Outreach

During the application period, the Commission will engage with stakeholders to provide support and information in the areas of licensing, expungement, and application support through:

- Open Office Hours and the promotion of dedicated equity email inbox.

Identified areas to conduct community outreach:

- February 2024: Worcester/Fitchburg
- March 2024: Lawrence/Lowell/Haverhill, Brockton/Randolph, New Bedford/Taunton/Fall River
- April 2024: Boston/Greater Boston/Cambridge, Springfield/Holyoke

Resources:

- "To-go" Backpacks available to Commissioners and staff when conducting outreach.





# Social Equity Program Reminder

The Social Equity Program (SEP) is accepting applications for Cohort IV from February 5th to April 30th, 2024.

- The review and acceptance period will end on May 31st, 2024.

SEP provides education, training, technical assistance, and business resources to qualified Social Equity Program participants.

- To apply for the Social Equity Program, visit MassCIP ([massciportal.com](https://massciportal.com)), create an account or log-in to your existing MassCIP account and follow the instructions for applying.

For those who need help with the application process, Social Equity Program Video Tutorials are available.

- Resources and additional information about the SEP program are available on the Cannabis Control Commission Massachusetts website.







# Questions?

**Silea R. Williams**

Director of Equity Programming and Community Outreach

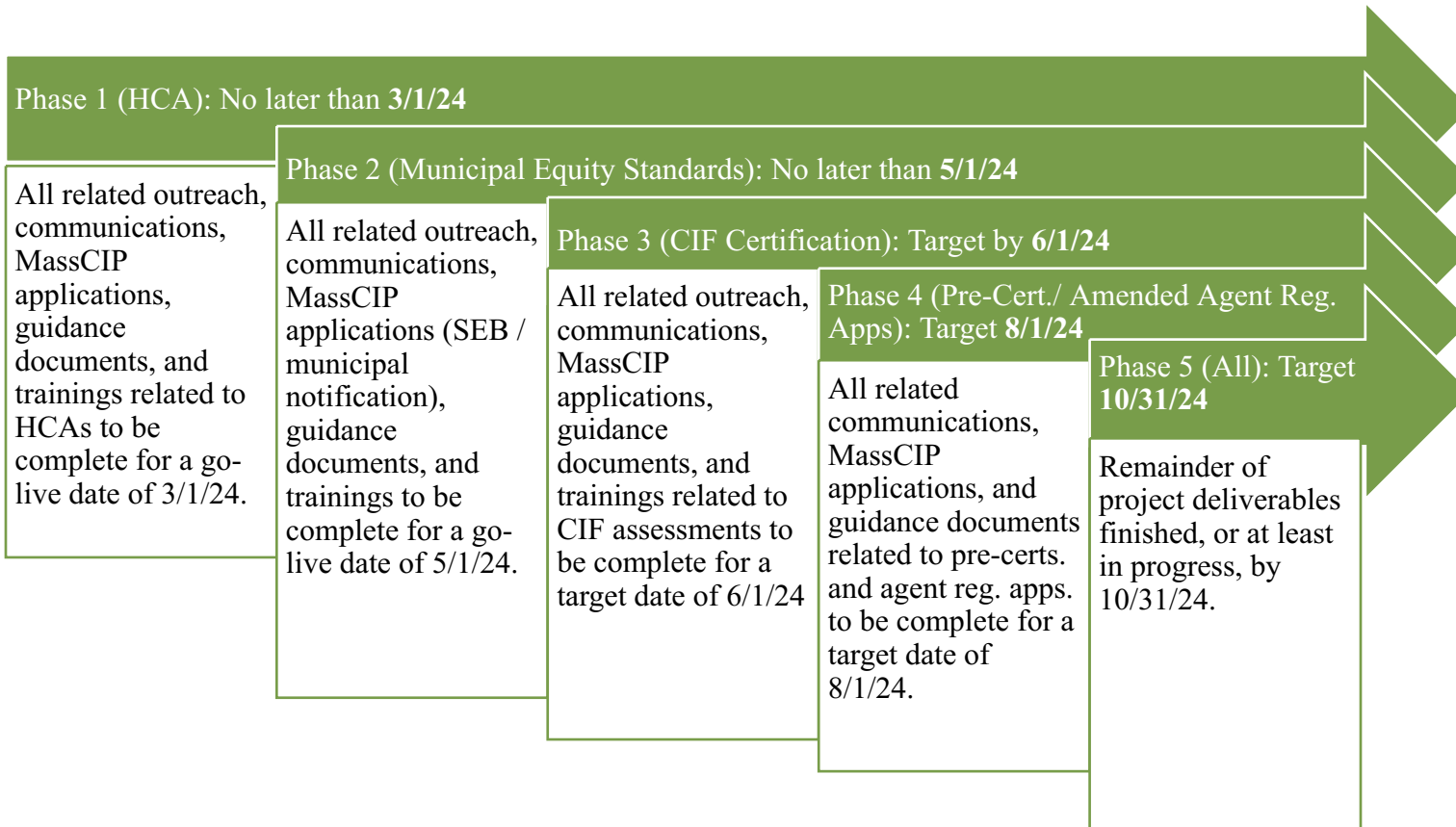
[Silea.Williams@CCCMass.com](mailto:Silea.Williams@CCCMass.com) or [Equity@CCCMass.com](mailto:Equity@CCCMass.com)

857-278-6385



# Update: Chapter 180 Regulations Implementation

## Identification of Key Dates and Milestones





# Update: Chapter 180 Regulations Implementation (cont.)

## Post-January Public Meeting Progress Update (As of 2/1/24)

Launch of Public Comment Period for the Model HCA Template (1/17/24-1/31/24).

Draft of Guidance on Host Community Agreements completed and now under final review.

Updated Guidance on Licensure completed and now under legal review.

External communication to constituents regarding regulations implementation expectations drafted and reviewed.

Updates to new and renewal license applications regarding HCAs and PIPs in final stage of development.

Staff training on HCAs and contract law tentatively scheduled.

Several request forms, checklists, and notices regarding changes to HCAs and PIPs under final review.



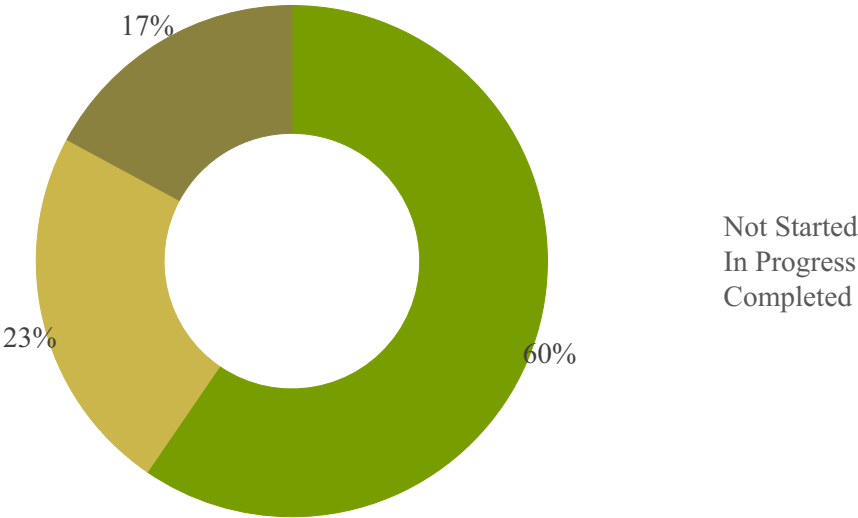


# Chapter 180 Data Snapshot | February 8, 2024

Data snapshot showing progress on the Chapter 180 Implementation deliverables. In this context, “deliverables” mean the end work product (e.g., Model HCA Template).

Deliverables (By Status)

Deliverables (By Status)	#	%
Not Started	125	59.5%
In Progress	49	23.3%
Completed	36	17.1%
<b>Total</b>	<b>210</b>	



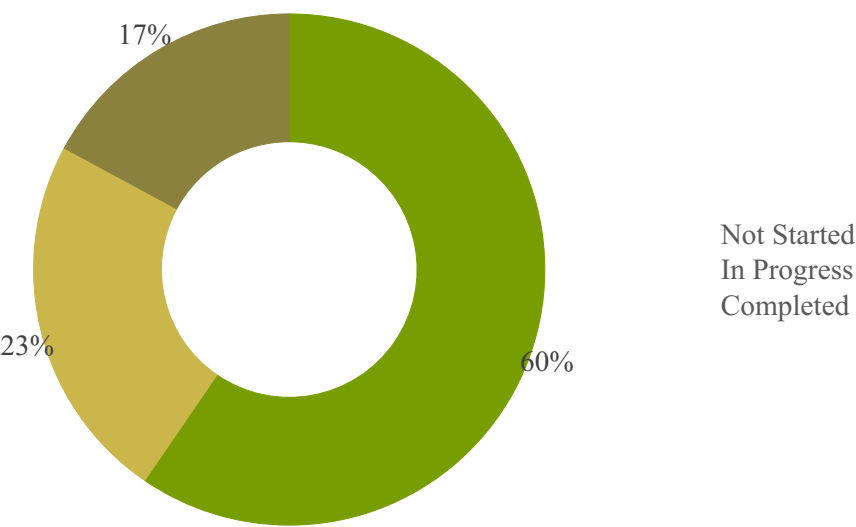


# Chapter 180 Data Snapshot | February 8, 2024

Data snapshot showing progress on the Chapter 180 Implementation checklist items. In this context, “checklist items” mean the individual work contribution to the end product (deliverable). (e.g., For the Model HCA Template, checklist items included the initial draft by the Enforcement Counsel team, review and editing by General Counsel team, formatting by the Digital Communication team, etc.).

Checklist Items (By Status)

Checklist Items (By Status)	#	%
Not Started	378	58.2%
In Progress	49	7.5%
Completed	223	34.3%
<b>Total</b>	<b>650</b>	





# Chapter 180: Acknowledgments & Appreciations

In the past month, a large number of deliverables and checklist items have been completed, hours of people power utilized, individuals not actively participating in the project covering other duties and playing their role, and significant collaboration across departments, teams, and staff realized.

Staff would like to acknowledge and show appreciation for the following teams in particular this month:

- Ø Communications Traditional, Digital, Government Affairs & Policy, and Equity Programming and Community Outreach Teams
- Ø I&E Licensing, Investigations, Enforcement Counsel, Constituent Services, and Project Management Teams
- Ø General Counsel Team
- Ø IT, Operations, and Data Teams
- Ø Research Team





# Highlights from Licensing Data

- 4 applications awaiting first review
- 19 applications awaiting supplemental review
- 6 applications for Provisional License consideration
- 9 licensees for Final License consideration





# Licensing Applications | February 8, 2024

*The totals below are number of approvals by stage.*

Type	#
Pre-Certified/Delivery Endorsed Microbusiness	203
Provisionally Approved	142
Provisional License	514
Final License	59
Commence Operations	627
<b>Total</b>	<b>1,545</b>

➡ **+26.6%**


\* Note: This represents the percent increase since February 2023

*Provisionally approved means approved by the Commission but has not submitted license fee payment yet - provisional license has not started*





# Licensing Applications | February 8, 2024

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	2	N/A	0	0	4	0	0	6
Marijuana Courier License	11	N/A	0	0	12	1	10	34
Marijuana Courier Pre-Certification	13	101	0	N/A	N/A	N/A	N/A	114
Independent Testing Laboratory	1	N/A	0	2	2	0	16	21
Marijuana Cultivator	47	N/A	2	48	187	30	126	440
Marijuana Delivery Operator License	8	N/A	0	0	22	2	10	42
Marijuana Delivery Operator Pre-Certification	14	99	0	N/A	N/A	N/A	N/A	113
Marijuana Microbusiness	6	N/A	0	5	13	0	5	29
Marijuana Product Manufacturer	32	N/A	1	47	136	18	108	342
Marijuana Research Facility	5	N/A	0	1	1	0	0	7
Marijuana Retailer	54	N/A	2	37	132	8	343	576
Marijuana Transporter with Other Existing ME License	4	N/A	0	2	5	0	3	14
Microbusiness Delivery Endorsement	1	4	0	0	0	0	1	6
Third Party Transporter	9	N/A	0	0	0	0	5	14
Standards Laboratory	0	N/A	0	0	0	0	0	0
 Total	207	204	5	142	514	59	627	1,758





# Staff Recommendations on Licensure



# Staff Recommendations: Changes of Ownership


1. Canna Provisions, Inc.
2. West County Collective, LLC
3. Ashli's, Inc.
4. Aunty Budz, LLC





# Staff Recommendations: Renewals

1. 220 ONEIL LLC (#MRR206749)
2. 6 Bricks, LLC. (#MRR206580)
3. Apothca, Inc. (#MRR206762)
4. Ascend Mass, LLC (#MRR206733)
5. Assured Testing Laboratories LLC (#ILR267933)
6. Atlantic Medicinal Partners, Inc. (#MCR140644)
7. Bask, Inc. (#MRR206697)
8. Bask, Inc. (#MRR206698)
9. Berkshire Roots, Inc. (#MRR206679)
10. Berkshire Roots, Inc. (#MXR126670)
11. Berkshire Roots, Inc. (#MCR140619)
12. Blossom Flower, LLC (#MDR272561)
13. Boston Bud Factory Inc. (#MRR206513)
14. Boston Bud Factory Inc. (#MPR244015)
15. Bracts & Pistils, LLC (#DOR5182967)
16. Canna Provisions Inc (#MRR206722)
17. Canna Provisions Inc (#MRR206758)

- 
18. Caregiver-Patient Connection LLC (#MCR140651)

19. Caregiver Patient Connection LLC (#MPR244122)



# Staff Recommendations: Renewals

26. ELEVATION RETAIL II LLC (#MRR206748)
27. EMB Natural Ventures, LLC (#MCR140674)
28. Enlite Cannabis Dispensary, LLC (#MRR206759)
29. Farma Gardens LLC (#MBR169319)
30. Four Daughters Compassionate Care, Inc. (#MRR206665)
31. Full Harvest Moonz, Inc. (#MRR206715)
32. Grass Appeal LLC (#MPR244123)
33. Grass Appeal LLC (#MRR206755)
34. Grass Appeal LLC (#MCR140667)
35. Green Gold Group Inc (#MRR206781)
36. GreenStar Herbals, Inc. (#MRR206741)
37. Health Circle, Inc. (#MRR206735)
38. Holistic Industries, Inc (#MRR206761)
39. Holland Brands SB, LLC (#MRR206765)
40. Holyoke Smokes Corp (#MDR272568)
41. Ideal Craft Cannabis, Inc. (#MPR244048)
42. Ideal Craft Cannabis, Inc. (#MCR140572)



43. In Good Health, Inc. (#MCR140648)

44. In Good Health, Inc. (#MPR244107)



# Staff Recommendations: Renewals

51. M3 Ventures, Inc. (#MRR206703)
52. MA Craft Cultivation LLC (#MCR140660)
53. Mass Tree Holdings, LLC (#MCR140672)
54. Mayflower Medicinals, Inc. (#MCR140638)
55. Natural Agricultural Products, LLC (#MRR206696)
56. New Dia Fenway LLC (#MRR206763)
57. New Dia, LLC (#MRR206734)
58. Northeast Alternatives, Inc. (#MRR206760)
59. Northeast Select Harvest Corp. (#MRR206739)
60. Nova Farms, LLC (#MRR206742)
61. Patriot Care Corp (#MRR206720)
62. Pharmacannis Massachusetts, Inc. (#MRR206771)
63. Pioneer Valley Extracts, Inc. (#MPR244097)
64. Power Fund Operations (#MCR140643)
65. Pure Industries, Inc. (#MCR140656)
66. Regenerative LLC (#MCR140647)
67. Resinate, Inc. (#MRR206726)




68. Resinate, Inc. (#MRR206747)

69. Richards Flowers LLC (#MPR160318)



# Staff Recommendations: Renewals

- 76. The Fresh Connection Boston LLC (#MCR140657)
- 77. The Green Lady Dispensary, Inc. (#MRR206695)
- 78. The Green Lady Dispensary, Inc. (#MPR244092)
- 79. The Green Lady Dispensary, Inc. (#MCR140626)
- 80. The Harvest Club, LLC (#MRR206753)
- 81. The Verb is Herb, LLC. (#MRR206671)
- 82. Tower Three, LLC (#MCR140670)
- 83. Tradesman Exchange LLC (#MDR272566)
- 84. Twisted Growers LLC (#MPR244096)
- 85. Twisted Growers LLC (#MCR140632)
- 86. TYCA Green (#MRR206740)
- 87. TYCA Green (#MPR244120)
- 88. UC Cultivation, LLC (#MCR140663)
- 89. VanGarden Cannabis, LLC (#MPR244082)
- 90. VanGarden Cannabis, LLC (#MCR140608)
- 91. Verdant Reparative, Inc. (#MRR206552)
- 92. Verdant Reparative, Inc. (#MPR244070)

-  93. Wellness Connection of MA, Inc (#MRR206729)

- 94. West County Collective (#MCR140671)



# Staff Recommendations: Provisional Licenses

1. Chill & Bliss, LLC (#MRN284916)
2. Faded Flowers, LLC (#MCN283840)
3. Medicine Man Solutions, LLC (#MRN283261)
4. Melting Pot Manufacturing, Inc. (#MPN281882)
5. Pure Tewksbury, Inc. (#MRN284994)
6. The Copley Connection, LLC (#MRN284935)





# Staff Recommendations: Final Licenses

1. Aura Cannabis Company, LLC (#MR282487)
2. Cannabis Connection II, Inc. (#MR284816)
3. Diem Orange, LLC (#MP281684)
4. Grass Ventures, LLC (#MD1262)
5. Greener Leaf, Inc. (#MR281790)
6. R and R Ventures, LLC (#MB281504)
7. The Holistic Concepts, Inc. (#MR283012)
8. Tree Market Lynn, LLC (#MR282587)
9. Underground Legacy Social Club, LLC (#MR284914)





# Staff Recommendations: Responsible Vendor Training

1. 420 Trainers LLC (#DCCN462255)
2. Bright Buds Training (#DCCN462226)





# Staff Recommendations: Responsible Vendor Training Renewals

1. MACCTI, LLC (#RVR453145)





The Commission is in recess  
until 11:40





# Commission Discussion & Votes



# Commission Discussion & Votes

- Acting Executive Director / Commission Check-In

2. Bulletin – Safe and Sanitary Requirements for the Processing of Marijuana







# Upcoming Meetings & Adjournment



# Upcoming Meetings and Important Dates

*Public Meeting dates are tentative and subject to change*

## Next Meeting Date

**March 7, 2024**

Monthly Public Meeting  
10:00am

## 2024 Public Meetings\*

April 11	September 12
May 9	October 10
June 13	November 14
July 11	December 12
August 8	







# Additional Licensing Data



# Licensing Applications | February 8, 2024

*The totals below are all license applications received to date.*

Type	#
Pending	207
Withdrawn	1,342
Incomplete	8,015
Denied	5
Approved: Delivery Pre-certifications	200
Approved: Delivery Endorsements	5
Approved: Licenses	1,341
<b>Total</b>	<b>11,115</b>





# Licensing Applications | February 8, 2024

*The totals below are number of licenses approved by category.*

Type	#
Craft Marijuana Cooperative	4
Marijuana Courier	23
Marijuana Delivery Operator	34
Independent Testing Laboratory	20
Marijuana Cultivator	382
Marijuana Microbusiness	35
Marijuana Product Manufacturer	306
Marijuana Research Facility	2
Marijuana Retailer	520
Marijuana Third Party Transporter	5
Marijuana Transporter with Other Existing ME License	10
<b>Total</b>	<b>1,341</b>





# Licensing Applications | February 8, 2024

Status	#
Application Submitted: Awaiting Review	4
Application Reviewed: More Information Requested	189
Application Deemed Complete: Awaiting 3rd Party Responses	8
All Information Received: Awaiting Commission Consideration	6
Applications Considered by Commission (includes Delivery Pre-Cert)	1,551
<b>Total</b>	<b>1,758</b>





# Licensing Applications | February 8, 2024

*The totals below are applications that have submitted all four packets and are pending review.*

Type	#
Craft Marijuana Cooperative	2
Delivery-Only Provisional Licensure (Part 2)	11
Delivery-Only Pre-Certification (Part 1)	13
Independent Testing Laboratory	1
Marijuana Cultivator	47
Marijuana Delivery Operator Provisional License (Part 2)	8
Marijuana Delivery Operator Pre-Certification (Part 1)	14
Marijuana Microbusiness	6
Marijuana Product Manufacturer	32
Marijuana Research Facility	5
Marijuana Retailer	54
Marijuana Transporter with Other Existing ME License	4
Microbusiness Delivery Endorsement	1
Third Party Transporter	9
<b>Total</b>	<b>207</b>





# Licensing Applications | February 8, 2024

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Marijuana Cultivator (Indoor)	37	N/A	1	43	169	28	101	379
Marijuana Cultivator (Outdoor)	10	N/A	1	5	18	2	25	61
Total	47	N/A	2	48	187	30	126	440





# Licensing Applications | February 8, 2024

*Of 1,545 applications approved by the Commission, the following applications have Economic Empowerment Priority Review, Social Equity Program Participant, and/or Disadvantaged Business Enterprise status. Please note, applicants may hold one or more statuses. Please note that the end total represents the total number of applications/licenses at that step in the licensure process.*

Type	Economic Empowerment	Social Equity Program	Disadvantaged Business Enterprise	Total
Pre-Certified/Delivery Endorsed Microbusiness	42	166	28	236
Provisionally Approved	12	20	28	60
Provisional License	31	88	104	223
Final License	1	5	8	14
Commence Operations	27	44	77	148
<b>Total</b>	<b>113</b>	<b>323</b>	<b>245</b>	<b>681</b>

↑ 9.7%

↑ 12.2%

↑ 8.4%

\* Note: This represents the increase since February, 2023





# Licensing Applications | February 8, 2024

*The totals below are distinct license numbers that have submitted all required packets.*

The 1,758 applications represent 998 separate entities


Type	#
MTC Priority	255
Economic Empowerment Priority	133
Expedited Review	664
General Applicant	706
<b>Total</b>	<b>1,758</b>

Type	#
Expedited: License Type	81
Expedited: Social Equity Participant	329
Expedited: Disadvantaged Business Enterprise	194
Expedited: Two or More Categories	60
<b>Total</b>	<b>664</b>






# Licensing Applications - EE Only | February 8, 2024

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	0	N/A	0	0	0	0	0	0
Marijuana Courier License	0	N/A	0	0	4	0	4	8
Marijuana Courier Pre-Certification	0	28	0	N/A	N/A	N/A	N/A	28
Independent Testing Laboratory	0	N/A	0	0	0	0	0	0
Marijuana Cultivator	1	N/A	0	3	4	0	0	8
Marijuana Delivery Operator License	0	N/A	0	0	4	0	2	6
Marijuana Delivery Operator Pre-Certification	0	14	0	N/A	N/A	N/A	N/A	14
Marijuana Microbusiness	0	N/A	0	0	0	0	0	0
Marijuana Product Manufacturer	1	N/A	0	4	2	0	2	9
Marijuana Research Facility	1	N/A	0	0	0	0	0	1
Marijuana Retailer	6	N/A	0	4	16	1	19	46
Marijuana Transporter with Other Existing ME License	0	N/A	0	1	1	0	0	2
Microbusiness Delivery Endorsement	0	0	0	0	0	0	0	0
Third Party Transporter	1	N/A	0	0	0	0	0	1
Standards Laboratory	00	N/A	0	0	0	0	0	00
 Total	10	42	0	12	31	1	27	123



# Licensing Applications - SEP Only | February 8, 2024

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	1	N/A	0	0	1	0	0	2
Marijuana Courier License	7	N/A	0	0	8	2	7	24
Marijuana Courier Pre-Certification	8	79	0	N/A	N/A	N/A	N/A	87
Independent Testing Laboratory	0	N/A	0	0	0	0	0	0
Marijuana Cultivator	4	N/A	0	7	19	0	6	36
Marijuana Delivery Operator License	5	N/A	0	0	19	1	8	33
Marijuana Delivery Operator Pre-Certification	11	85	0	N/A	N/A	N/A	N/A	96
Marijuana Microbusiness	1	N/A	0	0	4	0	1	6
Marijuana Product Manufacturer	6	N/A	0	6	0	1	7	20
Marijuana Research Facility	1	N/A	0	0	15	0	0	16
Marijuana Retailer	15	N/A	1	4	20	1	13	54
Marijuana Transporter with Other Existing ME License	1	N/A	0	1	2	0	1	5
Microbusiness Delivery Endorsement	1	4	0	0	1	0	1	7
Third Party Transporter	4	N/A	0	0	0	0	0	4
Standards Laboratory	0	N/A	0	0	0	0	0	0
 Total	65	168	1	18	89	5	44	390



# Cultivation Applications | February 8, 2024

Type	Pending Application	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Microbusiness w/ Tier 1 Cultivation (up to 5,000 sq. Ft.)	0	0	3	5	0	5	13
Cultivation Tier 1 (Up to 5,000 sq. ft.)	14	0	6	41	9	23	93
Cultivation Tier 2 (5,001-10,000 sq. ft.)	8	0	9	52	11	33	113
Cultivation Tier 3 (10,001-20,000 sq. ft.)	5	2	9	40	4	20	80
Cultivation Tier 4 (20,001-30,000 sq. ft.)	1	0	4	14	2	12	33
Cultivation Tier 5 (30,001-40,000 sq. ft.)	2	0	9	8	1	10	30
Cultivation Tier 6 (40,001-50,000 sq. ft.)	3	0	4	8	0	6	21
Cultivation Tier 7 (50,001-60,000 sq. ft.)	2	0	1	4	1	4	12
Cultivation Tier 8 (60,001-70,000 sq. ft.)	1	0	0	1	0	2	4
Cultivation Tier 9 (70,001-80,000 sq. ft.)	3	0	1	3	1	2	10
Cultivation Tier 10 (80,001-90,000 sq. ft.)	1	0	1	1	0	6	9
Cultivation Tier 11 (90,001-100,000 sq. ft.)	7	0	4	15	1	8	35
Total	47	2	51	192	30	131	453
Total Maximum Canopy (Sq. Ft.)	1,730,000	40,000	1,625,000	4,830,000	575,000	3,810,000	

+19.1%

+23.1%

\* Note: percentage is of “Total” commence operations licenses

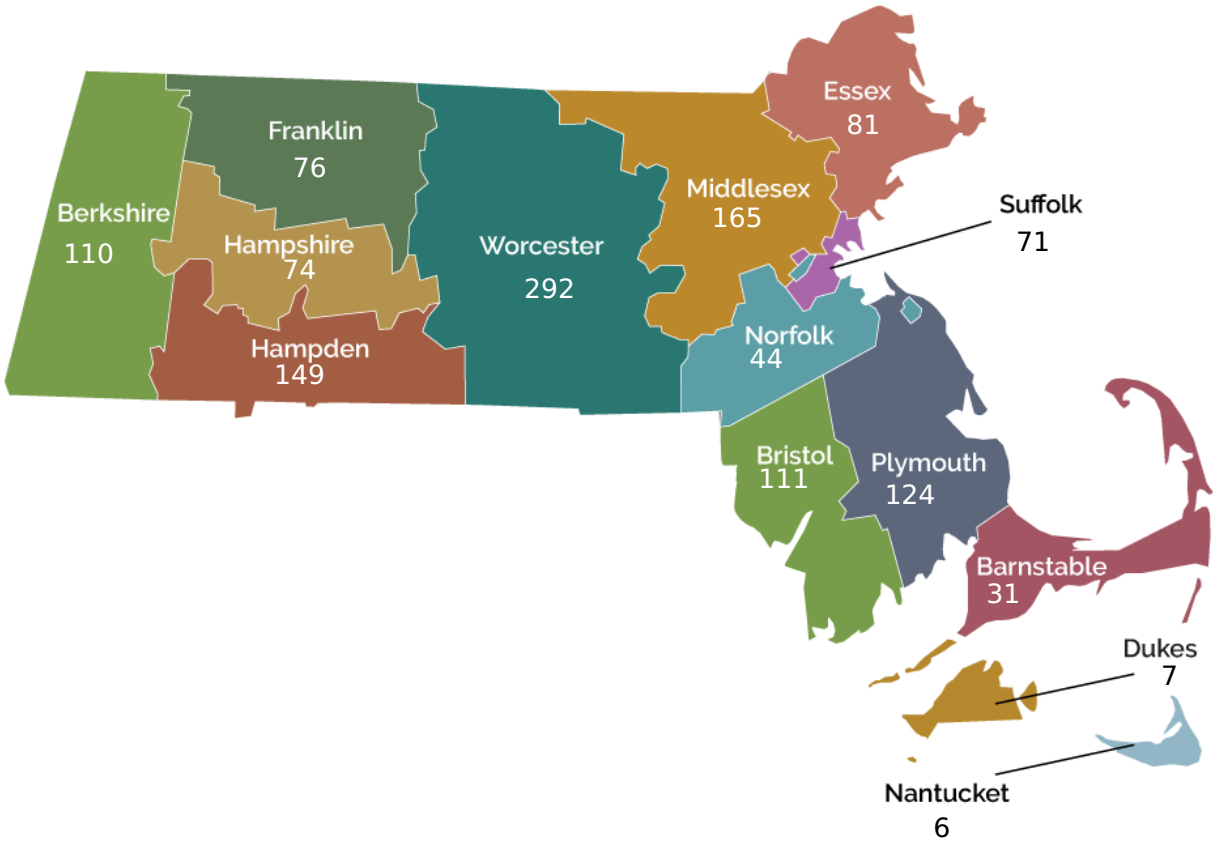




# Marijuana Establishment Licenses | February 8, 2024

*The totals below represent entities in each county that have achieved at least a provisional license*

County	#	+/-
Barnstable	31	0
Berkshire	110	0
Bristol	111	0
Dukes	7	0
Essex	81	2
Franklin	76	0
Hampden	149	0
Hampshire	74	0
Middlesex	165	1
Nantucket	6	0
Norfolk	44	1
Plymouth	124	1
Suffolk	71	1
Worcester	292	0
<b>Total</b>	<b>1,341</b>	<b>6</b>





# MMJ Licensing and Registration Data | February 8, 2024

The numbers below are a snapshot of the program for the month of February.

MTC Licenses	#
Provisional	25
Final	1
Commence Operations	105
License Expired	61
<b>Total</b>	<b>192</b>

MMJ Program	#
Certified Patients	96,271
Certified Active Patients	90,780
Active Caregivers	6,997
Registered Certifying Physicians	326
Registered Certifying Nurse Practitioners	118
Registered Physician Assistants	1
Ounces Sold	92,677

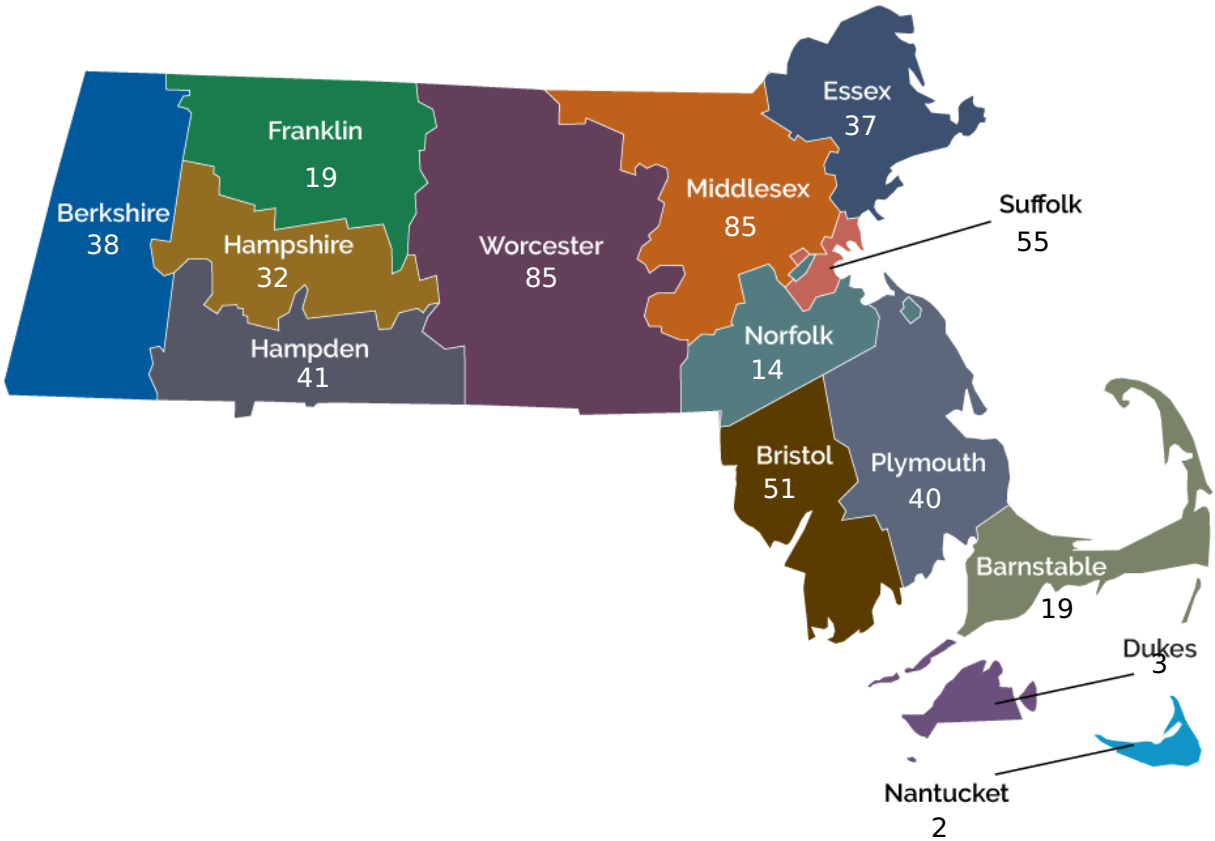




# Marijuana Retailer Licenses | February 8, 2024

The totals below are the total number of retail licenses by county.

County	#	+/-
Barnstable	19	0
Berkshire	38	0
Bristol	51	0
Dukes	3	0
Essex	37	1
Franklin	19	0
Hampden	41	0
Hampshire	32	0
Middlesex	85	1
Nantucket	2	0
Norfolk	14	2
Plymouth	40	0
Suffolk	55	0
Worcester	85	0
<b>Total</b>	<b>521</b>	<b>4</b>

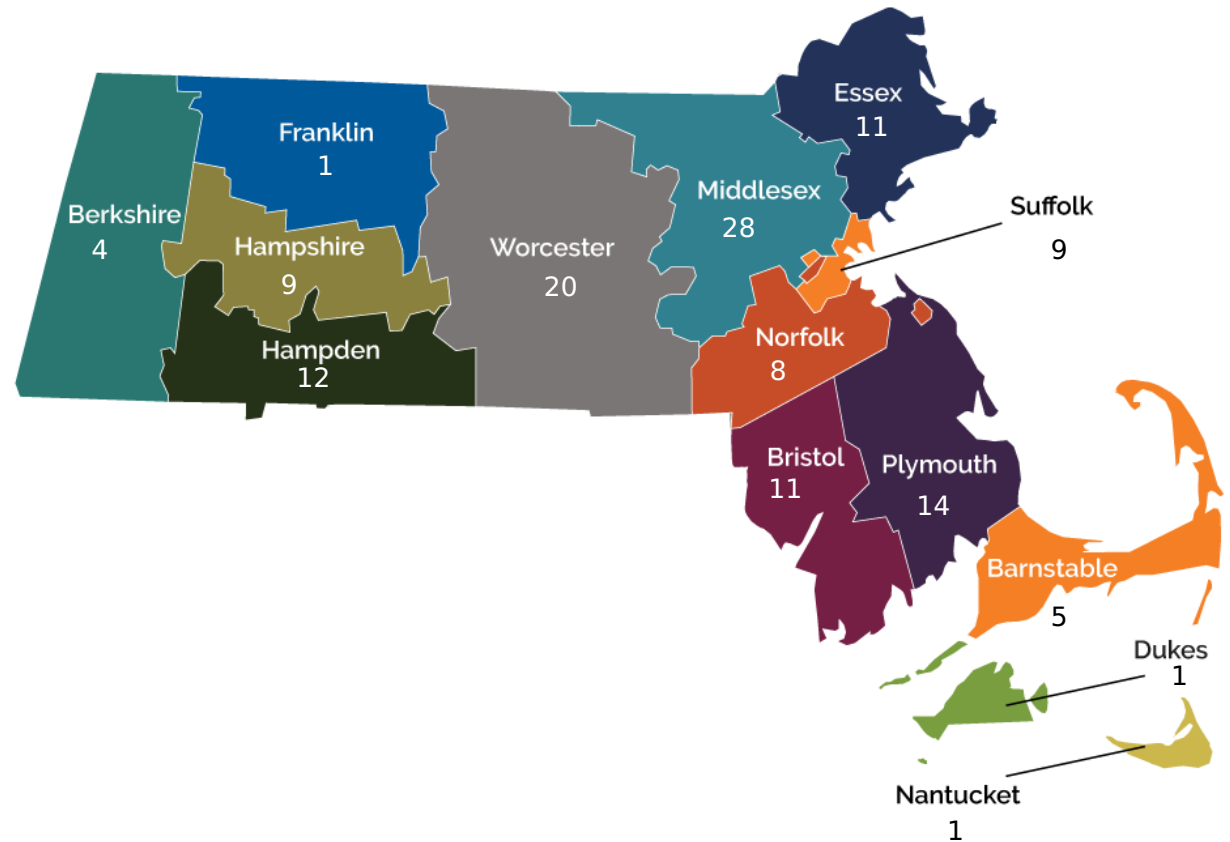




# Medical Marijuana Treatment Center Licenses (Dispensing) February 8, 2024

*The totals below are the total number of MTC (Dispensing) licenses by county.*

County	#
Barnstable	5
Berkshire	4
Bristol	11
Dukes	1
Essex	11
Franklin	1
Hampden	12
Hampshire	9
Middlesex	28
Nantucket	2
Norfolk	8
Plymouth	14
Suffolk	9
Worcester	20
<b>Total</b>	<b>135</b>



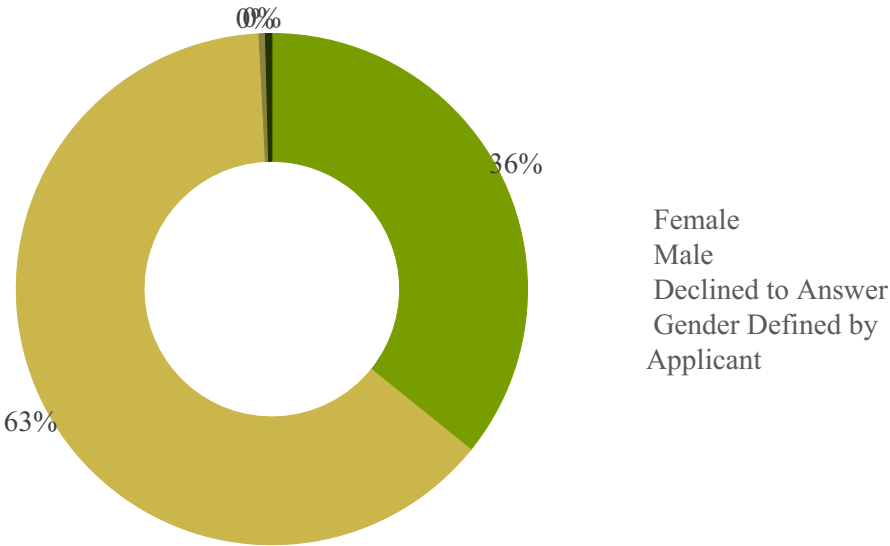


# Agent Applications | February 8, 2024

Demographics of Approved and Pending Marijuana Establishment Agents

Gender	#	%
Female	8,073	35.7%
Male	14,271	63.0%
Declined to Answer	186	0.8%
Gender Defined by Applicant	108	0.5%
<b>Total</b>	<b>22,638</b>	<b>100.0%</b>

Gender of Approved and Proposed Agents



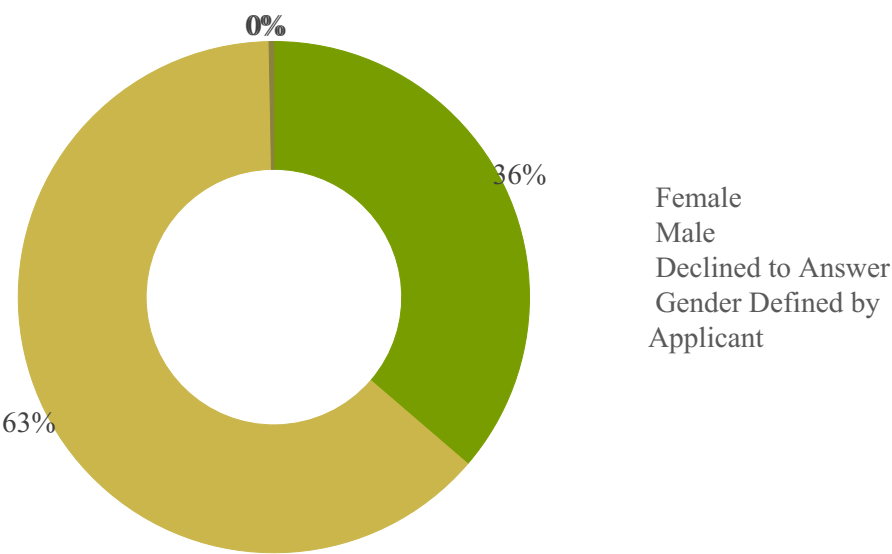


# Agent Applications | February 8, 2024

Demographics of Approved and Pending Medical Marijuana Treatment Center Agents

Gender	#	%
Female	2,645	36.0%
Male	4,676	63.6%
Declined to Answer	28	0.4%
Gender Defined by Applicant	0	0.0%
<b>Total</b>	<b>7,349</b>	<b>100.0%</b>

Gender of Approved and Proposed MTC A



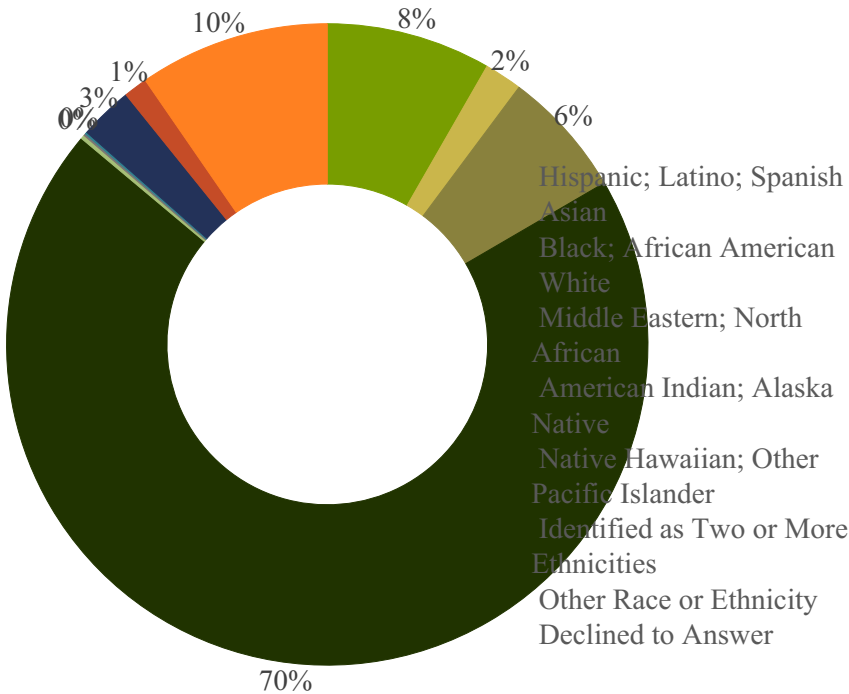


# Agent Applications | February 8, 2024

Demographics of Approved and Pending Marijuana Establishment Agents

Race/Ethnicity	#	%
Hispanic; Latino; Spanish	1,957	8.6%
Asian	486	2.1%
Black; African American	1,481	6.5%
White	15,124	66.8%
Middle Eastern; North African	56	0.2%
American Indian; Alaska Native	34	0.2%
Native Hawaiian; Other Pacific Islander	15	0.1%
Identified as Two or More Ethnicities	650	2.9%
Other Race or Ethnicity	203	0.9%
Declined to Answer	2,632	11.6%
<b>Total</b>	<b>22,638</b>	<b>100.0%</b>

Race/Ethnicity of Approved and Proposed ME Agents



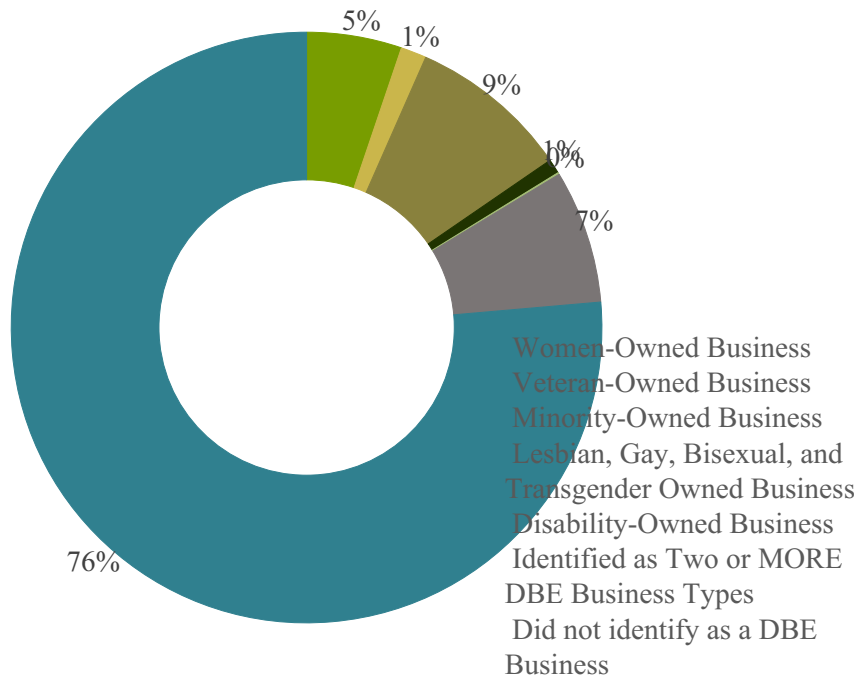


# Licensing Applications | February 8, 2024

*Disadvantaged Business Enterprise Statistics for Approved Licensees*

Type	#	% of Group
Women-Owned Business	89	5.8%
Veteran-Owned Business	24	1.6%
Minority-Owned Business	140	9.1%
Lesbian, Gay, Bisexual, and Transgender Owned Business	12	0.8%
Disability-Owned Business	2	0.1%
Identified as Two or MORE DBE Business Types	107	6.9%
Did not identify as a DBE Business	1,172	75.8%
<b>Total</b>	<b>1,546</b>	<b>100.0%</b>

DBE Statistics Approved Licensees



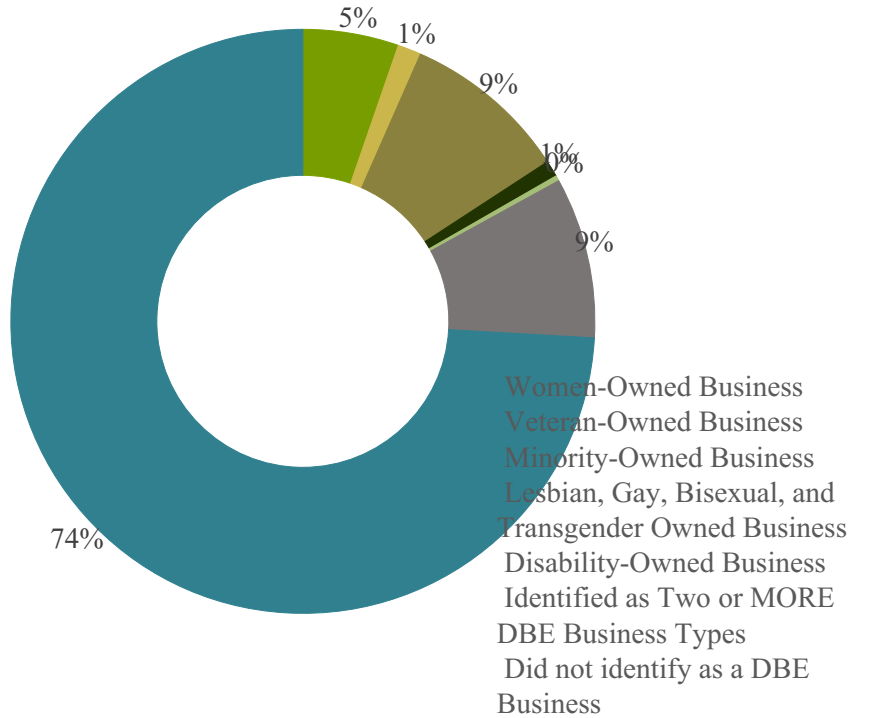


# Licensing Applications | February 8, 2024

*Disadvantaged Business Enterprise (DBE) Statistics for Pending and Approved License Applications*

Type	#	% of Group
Women-Owned Business	98	5.6%
Veteran-Owned Business	26	1.5%
Minority-Owned Business	157	9.0%
Lesbian, Gay, Bisexual, and Transgender Owned Business	14	0.8%
Disability-Owned Business	4	0.2%
Identified as Two or More DBE Business Types	139	7.9%
Did not identify as a DBE Business	1,315	75.0%
<b>Total</b>	<b>1,753</b>	<b>100.0%</b>

DBE Statistics for Pending & Approved Lic





# Adult Use Agent Applications | February 8, 2024

## Total Agent Applications:

- 291 Total Pending
  - 283 Pending Establishment Agents
  - 8 Pending Laboratory Agents
- 3,361 Withdrawn
- 2,670 Incomplete
- 4,801 Expired
- 36,859 Surrendered
- 6 Denied / 2 Revoked
- 22,347 Active

## Of the Total Pending:

- 150 not yet reviewed
- 136 CCC requested more information
- 5 awaiting third party response
- 0 review complete; awaiting approval





# Medical Use Agent Applications | February 8, 2024

*The total number of MTC agent applications received by status.*

MTC Agent Application	#
Pending MTC Agent Applications	25
Pending Laboratory Agent Applications	0
Incomplete	93
Revoked	13
Denied	31
Surrendered	18,009
Expired	2,852
Active	7,324
<b>Total</b>	<b>28,347</b>

