



July 2020 Public Meeting Packet

Microsoft Teams Live



July 2020 Public Meeting Packet

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Commission Discussion & Votes

Report to the Legislature on Alternative Tax Structures

Julie Johnson

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Business the Chair did not anticipate & Next meetings

Executive Session & Adjournment

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July 7, 2020

In accordance with Sections 18-25 of Chapter 30A of the Massachusetts General Laws and the [Governor's Order suspending certain provisions of the Open Meeting Law](#), M.G.L Ch. 30A §20, notice is hereby given of a meeting of the Cannabis Control Commission. The meeting will take place as noted below.

CANNABIS CONTROL COMMISSION

**July 9, 2020
10:00AM**

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

PUBLIC MEETING AGENDA

- 1) Call to Order
- 2) Chairman's Comments and Updates
- 3) Minutes for Approval
- 4) Executive Director's Report
 - a. Licensing Highlights
 - b. Budget Update
 - c. Vaping Update
 - d. Job Description
- 5) Enforcement Actions
 - a. Garden Remedies, Inc.
 - b. The Botanist, Inc.
 - c. Healthy Pharms, Inc.
- 6) Staff Recommendations on Changes of Ownership
 - a. Garden Remedies, Inc.
 - b. Krypies, LLC
 - c. Pharmacannis Massachusetts, Inc.
- 7) Staff Recommendations on Changes of Location
 - a. NS AJO Holdings, Inc.
 - b. Liberty Market, LLC
- 8) Staff Recommendations on Renewals
 - a. Mission MA, Inc. (#MRR205582)



- b. Sira Naturals, Inc. (#MCR139882)
- c. Sira Naturals, Inc. (#MPR243523)
- d. Sira Naturals, Inc. (#MXR126656)
- e. Mass Yield Cultivation LLC. (#MCR139879)
- f. Krypies LLC (#MRR205586)
- g. Caregiver-Patient Connection LLC (#MRR205589)
- h. Massgrow, LLC (#MPR243518)
- i. Massgrow, LLC (#MCR139875)
- j. Bud's Goods & Provisions, Corp. (#MCR139883)
- k. Bud's Goods & Provisions, Corp. (#MPR243526)
- l. BeWell Organic Medicine, Inc. (#RMD1245)
- m. Garden Remedies, Inc. (#RMD1005)
- n. Bountiful Farms, Inc. (#RMD1485)
- o. Heka, Inc. Vertically Integrated Medical Marijuana Treatment Center
- p. Heka, Inc. (#RMD1385)
- q. Mayflower Botanicals, Inc., Vertically Integrated Medical Marijuana Treatment Center
- r. Northeast Alternatives, Inc. (#RMD745)
- s. NS AJO Holdings, Inc., Vertically Integrated Medical Marijuana Treatment Center (Fitchburg – Fitchburg)
- t. NS AJO Holdings, Inc., Vertically Integrated Medical Marijuana Treatment Center (Fitchburg – Watertown)
- u. Sira Naturals, Inc., Vertically Integrated Medical Marijuana Treatment Center
- v. Solurge, Inc., Vertically Integrated Medical Marijuana Treatment Center
- w. Revolutionary Clinics II, Inc. (#RMD1346)
- x. Revolutionary Clinics II, Inc. (#RMD925)
- y. Wellness Connection of MA, Inc., Vertically Integrated Medical Marijuana Treatment Center
- z. Agricultural Healing, Inc., Vertically Integrated Medical Marijuana Treatment Center
- aa. Commcan, Inc. (#RMD565)
- bb. Ipswich Pharmaceutical Associates, Inc. (#RMD1306)
- cc. Cannatech Medicinals, Inc. (#RMD1105)
- dd. INSA, Inc. (#RMD365)
- ee. INSA, Inc. (#RMD845)
- ff. Sanctuary Medicinals, Inc. (#RMD1127)



9) Staff Recommendations on Final Licenses

- a. Cannavanna, Inc. f/k/a Fidelity Wellness Center (#MR282801), Retail
- b. Four Daughters Compassionate Care d/b/a Zen Leaf Sharon (#MR281552), Retail
- c. Four Daughters Compassionate Care d/b/a Zen Leaf Plymouth (#MR282232), Retail
- d. Garden Remedies, Inc. (#MR282471), Retail
- e. Pharmacannis Massachusetts, Inc. d/b/a Verilife (#MR282298), Retail
- f. Patient Centric of Martha's Vineyard, LTD, Vertically Integrated Medical Marijuana Treatment Center

10) Staff Recommendations on Provisional Licenses

- a. 202 Trading Company, LLC (#MRN281735), Retail
- b. 6 Bricks, LLC (#MRN283098), Retail
- c. Alexsofia, LLC (#MRN282926), Retail
- d. BKPN, LLC (#MRN282853), Retail
- e. Buudda Brothers 90 Sargeant Street, LLC (#MCN282254), Cultivation, Tier 3 / Indoor
- f. Buudda Brothers 90 Sargeant Street, LLC (#MPN281870), Product Manufacturer
- g. Calyx Peak of MA, Inc. (#MCN281927), Cultivation, Tier 3 / Indoor
- h. Calyx Peak of MA, Inc. (#MPN281574), Product Manufacturer
- i. Canna Provisions, Inc. (#MCN282476), Cultivation, Tier 3 / Indoor
- j. Coastal Cultivars, LLC (#MCN282052), Cultivation, Tier 11 / Outdoor
- k. Comm Ave Canna, Inc. (#MRN282314), Retail
- l. Coyote Cannabis Corporation (#MCN282498), Cultivation, Tier 1 / Indoor
- m. Coyote Cannabis Corporation (#MPN281798), Product Manufacturer
- n. DDM Sales, Inc. (#MRN281981), Retail
- o. Deep Roots, Inc. (#MBN281496), Microbusiness, Cultivation and Product Manufacturing Operations
- p. Deerfield Naturals, Inc. (#MCN281426), Cultivation, Tier 3 / Indoor
- q. Deerfield Naturals, Inc. (#MPN281541), Product Manufacturer
- r. Deerfield Naturals, Inc. (#MRN281929), Retail
- s. Eskar Arlington, LLC (#MRN282638), Retail
- t. Eskar Northbridge, LLC (#MRN283073), Retail
- u. Four Score Holdings, LLC (#MCN282187), Cultivation, Tier 2 / Indoor
- v. Four Score Holdings, LLC (#MPN281689), Product Manufacturer
- w. Four Score Holdings, LLC (#MRN282757), Retail



- x. Green Leaf Health, Inc. (#MRN282991), Retail
- y. Green Meadows Farm, LLC (#MCN282409), Cultivation, Tier 3 / Indoor
- z. Green Meadows Farm, LLC (#MPN281763), Product Manufacturer
- aa. GTE Franklin, LLC (#MRN282766), Retail
- bb. Heal Cultivation, LLC (#MCN282119), Cultivation, Tier 2 / Indoor
- cc. Heal Cultivation, LLC (#MPN281658), Product Manufacturer
- dd. Holistic Industries Inc. (#MRN282667), Retail
- ee. Holyoke 420, LLC (#MRN282703), Retail
- ff. HTC Trinity, LLC (#MRN283121), Retail
- gg. Hudson Growers Alliance, LLC (#MCN282581), Cultivation, Tier 1 / Indoor
- hh. LMCC, LLC (#MRN282885), Retail
- ii. MJ's Market, Inc. (#MCN281274), Cultivation, Tier 1 / Indoor
- jj. MJ's Market, Inc. (#MPN281758), Product Manufacturer
- kk. MJ's Market, Inc. (#MRN281457)
- ll. Neo Manufacturing MA, LLC (#MCN282043), Cultivation, Tier 3 / Indoor
- mm. Neo Manufacturing MA, LLC (#MPN281622), Product Manufacturer
- nn. New Green, LLC (#MRN282969), Retail
- oo. New Leaf Enterprises, Inc. (#MRN283203), Retail
- pp. New Leaf Enterprises, Inc. (#MRN283204), Retail
- qq. Patient Centric of Martha's Vineyard, LTD. (#MCN282347), Cultivation, Tier 1 / Indoor
- rr. Patient Centric of Martha's Vineyard, LTD. (#MPN281747), Product Manufacturer
- ss. Patient Centric of Martha's Vineyard, LTD. (#MRN282947), Retail
- tt. Peak Limited, LLC (#MCN282217), Cultivation, Tier 2 / Indoor
- uu. Peak Limited, LLC (#MPN281707), Product Manufacturer
- vv. Royal Hemp, LLC (#MPN281741), Product Manufacturer
- ww. Royal Hemp, LLC (#MRN282799), Retail
- xx. Salisbury Cultivation and Production Manufacturing, LLC (#MCN282530), Cultivation, Tier 3 / Indoor
- yy. Salisbury Cultivation and Production Manufacturing, LLC (#MPN281819), Product Manufacturer
- zz. Salty Farmers, LLC (#MCN282276), Cultivation, Tier 1 / Indoor
- aaa. Salty Farmers, LLC (#MRN282640), Retail
- bbb. Solurge, Inc. (#MCN281300), Cultivation, Tier 3 / Indoor
- ccc. Solurge, Inc. (#MPN281591), Product Manufacturer



ddd. Solurge, Inc. (#MRN282372), Retail
eee. Ten-Ten, LLC (#MCN282523), Cultivation, Tier 3 / Indoor
fff. Ten-Ten, LLC (#MCN282524), Cultivation, Tier 3 / Outdoor
ggg. Ten-Ten, LLC (#MPN281809), Product Manufacturer
hhh. Ten-Ten, LLC (#MRN283165), Retail
iii. The Botanist, Inc. (#MRN282160), Retail
jjj. The Botanist, Inc. (#MRN282186), Retail
kkk. The Fresh Connection Boston, LLC (#MCN281442), Cultivation, Tier 2 /
Indoor
lll. The High End Chocolate Company, LLC (#MPN281656), Product
Manufacturer
mmm. The High End Wellness Company, LLC (#MRN282666), Retail
nnn. The Hub Craft, LLC (#MCN282323), Cultivation, Tier 3 / Indoor
ooo. The Hub Craft, LLC (#MPN281740), Product Manufacturer
ppp. Tree Market Taunton, LLC (#MRN281597), Retail
qqq. Union Leaf, Inc. (#MRN282570), Retail
rrr. Volcann, LLC (#MRN282925), Retail
sss. Theory Wellness, Inc. Vertically Integrated Medical Marijuana Treatment
Center

- 11) Commission Discussion and Votes
 - a. Report to the Legislature on Alternative Tax Structures
- 12) New Business that the Chairman did not anticipate at time of posting
- 13) Next Meeting Date & Regulatory Calendar
- 14) Executive Session
- 15) Adjournment

*Closed captions available

**Full licensing data to be published with meeting packet, but will not be reviewed during the meeting.

Notice of Executive Session

Under the Open Meeting Law, G.L. c. 30A, § 21(a)(2) and (3) and the Public Records Law, G.L. c. 66, and the exemptions set forth in G.L. c. 4, § 7(26)(a), (b), (c), (d), (f), (g) and (n), the Commission may enter into executive session to discuss the following items if the relevant topic arises during the course of deliberations:



- 1) To conduct strategy sessions in preparation for negotiations with nonunion personnel or to conduct collective bargaining sessions or contract negotiations with nonunion personnel;
- 2) To discuss strategy with respect to collective bargaining or litigation.



CANNABIS CONTROL COMMISSION

**April 9, 2020
10:00AM**

**Cannabis Control Commission
Remote Participation
PUBLIC MEETING MINUTES**

Documents:

- Application materials for the following applications:
 - Canna Provisions, Inc.
 - Cultivate Holdings, LLC
 - Theory Farms, LLC
 - Nature's Remedy of Massachusetts, Inc. (#MRN282049), Retail
 - Theory Wellness, Inc. (#MCR139866)
 - Greener Leaf, Inc. (#MRR205568)
 - Nature's Remedy of Massachusetts, Inc. (#MCR139865)
 - Nature's Remedy of Massachusetts, Inc. (#MPR243511)
 - Nature's Remedy of Massachusetts, Inc. (#MRR205564)
 - Nature's Remedy of Massachusetts, Inc. (#MRR205570)
 - Atlantic Medicinal Partners, Inc. (#MRR205569)
 - Nova Farms, LLC (#MCR139868)
 - Beacon Compassion, Inc. (#MCR139871)
 - Beacon Compassion, Inc. (#MPR243516)
 - Silver Therapeutics, Inc. (#MRR205573)
 - Berkshire Roots, Inc., (#RMD505)
 - Green Meadows Farms, LLC, Vertically Integrated Medical Marijuana Treatment Center
 - Just Healthy, LLC, Vertically Integrated Medical Marijuana Treatment Center
 - Holistic Industries, Vertically Integrated Medical Marijuana Treatment Center
 - Theory Wellness, Inc., (#RMD305)
 - Alternative Compassion Services, Inc., (#RMD585)
 - Patriot Care Corp., (#RMD165)
 - Beacon Compassion Center, Inc., Vertically Integrated Medical Marijuana Treatment Center
 - Curaleaf Massachusetts, Inc., (#RMD765)
 - Green Gold Group, Inc., (#RMD786)
 - Mass Alternative Care, Inc, Vertically Integrated Medical Marijuana Treatment Center
 - Phytotherapy, Inc., Vertically Integrated Medical Marijuana Treatment Center



- Emerald Grove, Inc, Vertically Integrated Medical Marijuana Treatment Center
- Central Avenue Compassionate Care, Inc (#RMD145)
- Apothca Inc. (#MC281276), Cultivation, Tier 5 / Indoor
- Apothca Inc. (#MP281455), Product Manufacturer
- Boston Bud Factory Inc (#MR281525), Retail
- Canna Provisions, Inc. (#MR281778), Retail
- Cannabis Connection, Inc. (#MR281362), Retail
- Cultivate Holdings, LLC (#MR282522), Retail
- Eagle Eyes Transport, Inc. (#MT281320), Third-Party Transporter
- Haverhill Stem, LLC (#MR281327), Retail
- HVV Massachusetts, Inc. (#MC282121), Cultivation, Tier 3 / Indoor
- HVV Massachusetts, Inc. (#MP281657), Product Manufacturer
- HVV Massachusetts, Inc. (#MR282578), Retail
- Old Planters of Cape Ann, Inc. (#MR282588), Retail
- TDMA, LLC (#MR282376), Retail
- Temescal Wellness of Massachusetts, LLC (#MR282033), Retail
- The Heirloom Collective, Inc. (#MC281438), Cultivation, Tier 2 / Indoor
- The Heirloom Collective, Inc. (#MP281407), Product Manufacturer
- ARL Healthcare, Inc. (#MCN281622), Cultivation, Tier 4 / Indoor
- ARL Healthcare, Inc. (#MPN281681), Product Manufacturer
- ARL Healthcare, Inc. (#MRN282382), Retail
- Berkley Botanicals, LLC (#MCN282081), Cultivation, Tier 2 / Indoor
- Berkley Botanicals, LLC (#MPN281642), Product Manufacturer
- Berkley Botanicals, LLC (#MRN281458), Retailer
- BWell Holdings, Inc. (#MRN282825), Retail
- CNA Stores, Inc. (#MCN282190), Cultivation, Tier 4 / Indoor
- CNA Stores, Inc. (#MPN281691), Product Manufacturer
- CNA Stores, Inc. (#MRN281744), Retail
- CNA Stores, Inc. (#MRN282576), Retail
- Commcan, Inc. (#MRN283001), Retail
- Fourttwenty Industries, Co. (#MBN281535), Microbusiness (Cultivation and Product Manufacturing Operations)
- Fuego Farms, Inc. (#MCN282234), Cultivation, Tier 2 / Indoor
- Fuego Farms, Inc. (#MPN281716), Product Manufacturer
- Hemp Holistics, LLC (#MBN281425), Microbusiness (Cultivation Operations)
- Hennep, Inc. (#MRN281450), Retail
- Highminded, LLC (#MPN281662), Product Manufacturer
- Highminded, LLC (#MRN282318), Retail
- Holistic Industries, Inc. (#MCN282056), Cultivation, Tier 3 / Indoor
- Holistic Industries, Inc. (#MPN281630), Product Manufacturer
- Hudson Botanical Processing, LLC (#MPN281588), Product Manufacturer
- Humboldt Masters, LLC (#MCN282102), Cultivation, Tier 4 / Indoor
- Humboldt Masters, LLC (#MPN281467), Product Manufacturer
- Liberty Compassion, Inc. (#MCN282178), Cultivation, Tier 2 / Indoor



- Liberty Compassion, Inc. (#MPN281752), Product Manufacturer
- Massmedicum Corp. (#MCN281929), Cultivation, Tier 7 / Indoor
- Massmedicum Corp. (#MPN281687), Product Manufacturer
- Massmedicum Corp. (#MRN282715), Retail
- Massmedicum Corp. (#MRN283004), Retail
- Royalty Group, LLC (#MRN282088), Retail
- Sun Mass II, LLC (#MRN281816), Retail
- Sun Mass II, LLC (#MCN281732) Cultivation, Tier 8 / Indoor
- Supercritical Mass Laboratories, Inc. (#MPN281321), Product Manufacturer
- The Botanist, Inc. (#MRN282160), Retail
- The Botanist, Inc. (#MRN282186), Retail
- The Old Bank, LLC (#MRN282467), Retail
- Tigertown, LLC (#MRN282818), Retail
- Tower Three, LLC (#MCN281652), Cultivation, Tier 2 / Indoor
- Treeworks of Massachusetts, LLC (#MPN281343), Product Manufacturer
- Wellman Farm, Inc. (#MPN281317), Product Manufacturer

In Attendance:

- Chairman Steven Hoffman
- Commissioner Kay Doyle
- Commissioner Jennifer Flanagan
- Commissioner Britte McBride
- Commissioner Shaleen Title

1. Call to Order

- The Chairman recognized a quorum.

2. Chairman's Comments & Updates

- The Chairman expressed his gratitude and respect for first responders, healthcare professionals, and essential workers.
- The Chairman also thanked staff for its continued productivity while working from home, resulting in a large list of licenses to consider at this meeting.
- The Chairman also announced that applications are open for the second cohort of the Social Equity Program.
- Chairman asked the Executive Director to give an update on the Amended Cease and Desist Order.
 - Executive Director discussed the Amended Cease and Desist Order, which would allow for adult-use operations to supplement the supply chain for medical operations subject to certain conditions.
 - Over a ten-day period that there's a 158% increase in patient registrations, therefore there will be additional demand on medical supply.



- In order to accommodate the need, MTCs, if they attest that they need supply, MTCs could use adult-use product manufacturers, cultivators, and retail products during the state of emergency to supplement the medical-use supply chain.
 - The attestation must be submitted by an MTC demonstrating the need of additional supply and naming the adult use facility that will meet that demand.
 - The Chairman noted that this was an issue raised at the emergency meeting on April 3, 2020, and this action is in response to that.
 - The Chairman gave an overview of the agenda and how he would facilitate the meeting given the unique remote format.
 - The Chairman asked for a motion to take a 10-minute recess.
 - Commissioner Doyle moved to recess for 10 minutes.
 - Commissioner Flanagan seconded the motion.
 - The Commission unanimously voted to recess for 10 minutes.
3. Minutes for Approval
- The Chairman asked for comments on Minutes from February 6, 2020.
 - Commissioner Title moved to approve the minutes from February 6, 2020.
 - Commissioner Doyle seconded the motion.
 - The commission unanimously approved the minutes from February 6, 2020
 - March 5, 2020
 - The Chairman asked for comments on the minutes from March 5, 2020.
 - Commissioner McBride moved to approve the minutes from March 5, 2020.
 - Commissioner Flanagan seconded the motion.
 - The Commission unanimously approved the minutes from March 5, 2020.
4. Staff Recommendations on Changes of Ownership
- a. Canna Provisions, Inc.
- Director Potvin presented the Staff Recommendation for change of ownership.
 - The Chairman asked for questions and comments then asked for a motion to approve the change of ownership.
 - Commissioner Doyle moved to approve the change of ownership.
 - Commissioner Title seconded the motion.
 - The Commission unanimously approved the change of ownership.
- b. Cultivate Holdings, LLC
- Director Potvin presented the Staff Recommendation for change of ownership.
 - The Chairman asked for questions and comments then asked for a motion to approve the change of ownership.
 - Commissioner McBride moved to approve the change of ownership.
 - Commissioner Flanagan seconded the motion.
 - The Commission unanimously approved the change of ownership.



c. Theory Farms, LLC

- Director Potvin presented the Staff Recommendation for change of ownership.
- The Chairman asked for questions and comments then asked for a motion to approve the change of ownership.
- Commissioner Title moved to approve the change of ownership.
- Commissioner Doyle seconded the motion.
- The Commission unanimously approved the change of ownership.

5. Staff Recommendations on Changes of Location

a. Nature's Remedy of Massachusetts, Inc. (#MRN282049), Retail

- Director Potvin presented the Staff Recommendation for change of location.
- The Chairman asked for questions and comments then asked for a motion to approve the change of location.
- Commissioner Flanagan moved to approve the change of location.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the change of location.

6. Staff Recommendations on Renewals

- The Chairman noted the Commission's practice of considering renewals in a roster, unless a Commissioner has requested a specific consideration. There will be three rosters: (i) Three adult-use applications subject to the two conditions requested by Commissioner Flanagan; (ii) The remainder of the adult-use applications with a condition from Commissioner Doyle in addition to the conditions requested by Commissioner Flanagan; and (iii) all medical-use applications.
- Adult-use applications subject to the two conditions requested by Commissioner Flanagan
 - Commissioner Flanagan requested two conditions.
 - Proposed condition 1: within 90 days of the removal of the State of Emergency declaration all adult-use licensees must notify the Cannabis Control Commission of updated actions taken on the Plans to Positively Impact disproportionately harmed people.
 - Proposed condition 2: within 90 days of the removal of the State of Emergency declaration all adult-use licensees must notify the Cannabis Control Commission of updated actions taken on the Diversity Plans.
 - The Chairman asked for additional questions and comments then for a motion to approve the renewal, subject to the conditions requested by Commissioner Flanagan.
 - Commissioner Doyle moved to approve the renewal, subject to the conditions requested by Commissioner Flanagan.
 - Commissioner Title seconded the motion.



- The Commission unanimously approved the renewal, subject to the conditions requested by Commissioner Flanagan.
- remainder of the adult-use applications with a condition from Commissioner Doyle in addition to the conditions requested by Commissioner Flanagan
 - The Chairman noted that the conditions requested by Commissioner Flanagan will apply to these applications as well.
 - Proposed condition 1: within 90 days of the removal of the State of Emergency declaration all adult-use licensees must notify the Cannabis Control Commission of updated actions taken on the Plans to Positively Impact disproportionately harmed people.
 - Proposed condition 2: within 90 days of the removal of the State of Emergency declaration all adult-use licensees must notify the Cannabis Control Commission of updated actions taken on the Diversity Plans.
 - Commissioner Doyle requested a condition.
 - Proposed condition: update timeline for commencing operations of MTCs colocated with these licenses.
 - The Chairman asked for a motion to approve the roster of renewals, subject to the conditions requested by Commissioners Doyle and Flanagan.
 - Commissioner McBride moved to approve the roster of renewals, subject to the conditions requested by Commissioners Doyle and Flanagan.
 - Commissioner Flanagan seconded the motion.
 - The Commission unanimously approved the renewals, subject to the conditions requested by Commissioners Doyle and Flanagan.
- All medical-use licenses
 - Commissioner Title requested a condition.
 - Proposed condition: submit program to provide reduced cost or free Marijuana to patients with documented Verified Financial Hardship, as required under 501.050(1)(h), to the Commission within 60 days. Include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.
 - The Chairman asked for additional questions and comments then asked for a motion to approve the remaining roster of renewals.
 - Commissioner Doyle moved to approve the remaining roster of renewals, subject to the condition requested by Commissioner Title.
 - Commissioner Flanagan seconded the motion.
 - The Commission unanimously approved the remaining roster of renewals, subject to the condition requested by Commissioner Title.

a. Theory Wellness, Inc. (#MCR139866)



- b. Greener Leaf, Inc. (#MRR205568)
- c. Nature's Remedy of Massachusetts, Inc. (#MCR139865)
- d. Nature's Remedy of Massachusetts, Inc. (#MPR243511)
- e. Nature's Remedy of Massachusetts, Inc. (#MRR205564)
- f. Nature's Remedy of Massachusetts, Inc. (#MRR205570)
- g. Atlantic Medicinal Partners, Inc. (#MRR205569)
- h. Nova Farms, LLC (#MCR139868)
- i. Beacon Compassion, Inc. (#MCR139871)
- j. Beacon Compassion, Inc. (#MPR243516)
- k. Silver Therapeutics, Inc. (#MRR205573)
- l. Berkshire Roots, Inc., (#RMD505)
- m. Green Meadows Farms, LLC, Vertically Integrated Medical Marijuana Treatment Center
- n. Just Healthy, LLC, Vertically Integrated Medical Marijuana Treatment Center
- o. Holistic Industries, Vertically Integrated Medical Marijuana Treatment Center
- p. Theory Wellness, Inc., (#RMD305)
- q. Alternative Compassion Services, Inc., (#RMD585)
- r. Patriot Care Corp., (#RMD165)
- s. Beacon Compassion Center, Inc., Vertically Integrated Medical Marijuana Treatment Center
- t. Curaleaf Massachusetts, Inc., (#RMD765)
- u. Green Gold Group, Inc., (#RMD786)
- v. Mass Alternative Care, Inc, Vertically Integrated Medical Marijuana Treatment Center
- w. Phytotherapy, Inc., Vertically Integrated Medical Marijuana Treatment Center
- x. Emerald Grove, Inc, Vertically Integrated Medical Marijuana Treatment Center
- y. Central Avenue Compassionate Care, Inc (#RMD145)

7. Staff Recommendations on Final Licenses

- The Chairman noted that final licenses are considered as rosters, unless specifically requested to be considered individually by a Commissioner. There will be two rosters consisting of: (i) that for which Commissioner Title will recuse herself and (ii) the remainder roster.

- a. Apothca Inc. (#MC281276), Cultivation, Tier 5 / Indoor
- b. Apothca Inc. (#MP281455), Product Manufacturer
- c. Boston Bud Factory Inc (#MR281525), Retail
- d. Canna Provisions, Inc. (#MR281778), Retail
- e. Cannabis Connection, Inc. (#MR281362), Retail
- f. Cultivate Holdings, LLC (#MR282522), Retail
- g. Eagle Eyes Transport, Inc. (#MT281320), Third-Party Transporter
- h. Haverhill Stem, LLC (#MR281327), Retail
- i. HVV Massachusetts, Inc. (#MC282121), Cultivation, Tier 3 / Indoor
- j. HVV Massachusetts, Inc. (#MP281657), Product Manufacturer
- k. HVV Massachusetts, Inc. (#MR282578), Retail
- l. Old Planters of Cape Ann, Inc. (#MR282588), Retail



m. TDMA, LLC (#MR282376), Retail

n. Temescal Wellness of Massachusetts, LLC (#MR282033), Retail

- Director Potvin presented the Staff Recommendation for final license.
- The Chairman asked for additional comments and then for a motion to approve the final license.
- Commissioner McBride moved to approve the final license.
- Commissioner Doyle seconded the motion.
- The Commission voted to approve the final license by a vote of four in favor (Doyle, Flanagan, Hoffman, McBride) and one recusal (Title).

o. The Heirloom Collective, Inc. (#MC281438), Cultivation, Tier 2 / Indoor

p. The Heirloom Collective, Inc. (#MP281407), Product Manufacturer

- Remainder Roster
 - Commissioner Title commented that going back to October 2018 she had been collecting and reviewing Host Community Agreements (HCAs) and recusing herself from votes in which she felt the associated HCA went beyond the law. Commissioner Title said she will no longer continue that practice for the sake of time. Commissioner Title thanked her Commissioners, legislators, and various stakeholders who have pushed for the requisite change.
 - The Chairman asked for additional questions and comments then asked for a motion to approve the remaining roster of final licenses.
 - Commissioner Title moved to approve the remaining roster of final licenses.
 - Commissioner McBride seconded the motion.
 - The Commission unanimously approved the remaining roster of final licenses.

8. Staff Recommendations on Provisional Licenses

- The chairman noted that generally, the Commission considers provisional licenses individually, but given the unique format of this meeting, provisional licenses will be considered in groups based on the applicant entity.

a. ARL Healthcare, Inc. (#MCN281622), Cultivation, Tier 4 / Indoor

b. ARL Healthcare, Inc. (#MPN281681), Product Manufacturer

c. ARL Healthcare, Inc. (#MRN282382), Retail

- Director Potvin presented the Staff Recommendation for all three ARL Healthcare, Inc. provisional licenses.
- The Chairman asked for questions and comments then asked for a motion to approve all three of the provisional licenses.
- Commissioner Title moved to approve all three of the provisional licenses.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved all three of the provisional licenses.

d. Berkley Botanicals, LLC (#MCN282081), Cultivation, Tier 2 / Indoor

e. Berkley Botanicals, LLC (#MPN281642), Product Manufacturer

f. Berkley Botanicals, LLC (#MRN281458), Retailer



- Director Potvin presented the Staff Recommendation for all three Berkley Botanicals, LLC provisional licenses.
- The Chairman asked for questions and comments then asked for a motion to approve all three of the provisional licenses.
- Commissioner Doyle moved to approve all three of the provisional licenses.
- Commissioner Title seconded the motion.
- The Commission unanimously approved all three of the provisional licenses.

g. BWell Holdings, Inc. (#MRN282825), Retail

- The Chairman noted that this is an expedited applicant due to Disadvantaged Business Enterprise (DBE) status.
- Director Potvin presented the Staff Recommendation for provisional license.
- Commissioner Doyle noted that the name of the applicant is similar to the name of another applicant and asked Director Potvin whether the two are affiliated and/or located in a similar region.
 - Director Potvin said it is very similar in name to another applicant. Based on the application materials the two are not affiliated. This applicant is located in Provincetown, which is geographically distinct from the other applicant.
- The Chairman asked for questions and comments then asked for a motion to the provisional license.
- Commissioner McBride moved to approve the provisional license.
- Commissioner Doyle seconded the motion.
- The Commission unanimously approved the provisional license.

h. CNA Stores, Inc. (#MCN282190), Cultivation, Tier 4 / Indoor

i. CNA Stores, Inc. (#MPN281691), Product Manufacturer

j. CNA Stores, Inc. (#MRN281744), Retail

k. CNA Stores, Inc. (#MRN282576), Retail

- The Chairman noted that this was an expedited application based on its status as a DBE.
- Director Potvin presented the Staff Recommendation for all four CNA Stores, Inc. provisional licenses.
- Commissioner Flanagan requested a condition
 - Proposed Condition: Provide more details relative to the social media campaign by stating specific topics that will be highlighted and who the intended audience is.
- The Chairman asked for questions and comments then asked for a motion to approve all three of the provisional licenses, subject to the condition requested by Commissioner Flanagan.
- Commissioner Title moved to approve all three of the provisional licenses, subject to the condition requested by Commissioner Flanagan.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved all three of the provisional licenses, subject to the condition requested by Commissioner Flanagan.



l. Commcan, Inc. (#MRN283001), Retail

- Director Potvin presented the Staff Recommendation provisional license.
- The Chairman asked for questions and comments then asked for a motion to the provisional license.
- Commissioner Doyle moved to approve the provisional license.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license.

m. Fourtweenty Industries, Co. (#MBN281535), Microbusiness (Cultivation and Product Manufacturing Operations)

- The Chairman noted that this was a priority review applicant based on the license type and Social Equity Program participant status.
- Director Potvin presented the Staff Recommendation provisional license.
- Commissioner Flanagan requested a condition.
 - Proposed condition: provide information on how donations to MRCC and C3RN will specifically impact the mentioned disproportionately impacted area as the letters do not provide such information.
- Commissioner Title requested a condition.
 - Proposed condition: revise diversity plan to define “people from diverse backgrounds” and adjust 10% goal to be objectively reasonable.
- The Chairman asked for questions and comments then asked for a motion to the provisional license, subject to the conditions requested by Commissioners Flanagan and Title.
- Commissioner Title moved to approve the provisional license, subject to the conditions requested by Commissioners Flanagan and Title.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license, subject to the conditions requested by Commissioners Flanagan and Title.

n. Fuego Farms, Inc. (#MCN282234), Cultivation, Tier 2 / Indoor

o. Fuego Farms, Inc. (#MPN281716), Product Manufacturer

- Director Potvin presented the Staff Recommendation for both Fuego Farms, Inc. provisional licenses.
- Commissioner Flanagan requested a condition.
 - Proposed condition: provide information on how donations C3RN will specifically impact Holyoke as the letter does not provide such information.
- The Chairman asked for questions and comments then asked for a motion to approve both of the provisional licenses, subject to the condition requested by Commissioner Flanagan.
- Commissioner Title moved to approve both of the provisional licenses, subject to the condition requested by Commissioner Flanagan.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved both of the provisional licenses, subject to the condition requested by Commissioner Flanagan.



- p. Hemp Holistics, LLC (#MBN281425), Microbusiness (Cultivation Operations)
- The Chairman noted that this was an expedited application based on license type.
 - Director Potvin presented the Staff Recommendation for provisional license.
 - The Chairman asked for questions and comments then asked for a motion to the provisional license.
 - Commissioner Doyle moved to approve the provisional license.
 - Commissioner Title seconded the motion.
 - The Commission unanimously approved the provisional license.
- q. Hennep, Inc. (#MRN281450), Retail
- Director Potvin presented the Staff Recommendation for provisional license.
 - Proposed condition: Adjust diversity plan goal to employ women in 20% of “retail positions and or management” to be clear and objectively reasonable, and fix typo identifying “people of all gender identities and sexual orientations” as a target group to hire.
 - The Chairman asked for questions and comments then asked for a motion to the provisional license, subject to the condition requested by Commissioners Title.
 - Commissioner McBride moved to approve the provisional license, subject to the condition requested by Commissioner Title.
 - Commissioner Doyle seconded the motion.
 - The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.
- r. Highminded, LLC (#MPN281662), Product Manufacturer
- s. Highminded, LLC (#MRN282318), Retail
- The Chairman noted that this was an expedited application based on their DBE status.
 - Director Potvin presented the Staff Recommendation for both Highminded, LLC provisional licenses.
 - Commissioner Flanagan requested a condition.
 - Proposed condition: provide specific information on the training sessions that will be conducted. Specifically, who is the intended audience, what is the subject matter of the training, is there an educational component to it besides personal experience, and how does this positively effect entry into the cannabis industry.
 - The Chairman asked for questions and comments then asked for a motion to approve both of the provisional licenses, subject to the condition requested by Commissioner Flanagan.
 - Commissioner McBride moved to approve both of the provisional licenses, subject to the condition requested by Commissioner Flanagan.
 - Commissioner Doyle seconded the motion.
 - The Commission unanimously approved both of the provisional licenses, subject to the condition requested by Commissioner Flanagan.
- t. Holistic Industries, Inc. (#MCN282056), Cultivation, Tier 3 / Indoor



- Director Potvin presented the Staff Recommendation for both Holistic Industries, Inc. provisional licenses, subject to separate votes.
- The Chairman asked for questions and comments then asked for a motion to approve the provisional license.
- Commissioner Title moved to approve the provisional license.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license

u. Holistic Industries, Inc. (#MPN281630), Product Manufacturer

- Commissioner McBride noted that applicant provided a product plan that generally described categories of products, but not detailed list of products was not included. Commissioner McBride would also like to better understand their use of “pharmaceutical grade” oil and whether this will be available on both the medical and adult use side.
 - Proposed condition: provide a list of products indicated in their product plan and provide in writing what they mean, including, for example potency.
- The Chairman asked for questions and comments then asked for a motion to approve the provisional license, subject to the condition requested by Commissioner McBride.
- Commissioner Doyle moved to approve the provisional license, subject to the condition requested by Commissioner McBride.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner McBride.

RECESS

- The Chairman asked for a motion to recess for 10 minutes
- Commissioner Doyle moved to take a 10-minute recess.
- Commissioner Title seconded the motion.
- The Commissioner unanimously voted to recess for 10 minutes

v. Hudson Botanical Processing, LLC (#MPN281588), Product Manufacturer

- Director Potvin presented the Staff Recommendation provisional licenses.
- Commissioner Title requested a condition:
 - Proposed condition: review definition of disproportionately harmed people as defined in regulations and guidance and revise positive impact plan accordingly. The plan seems to be based on a mistaken assumption that all of Worcester is an area of disproportionate impact.
- The Chairman asked for questions and comments then asked for a motion to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Flanagan moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Doyle seconded the motion.



- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

w. Humboldt Masters, LLC (#MCN282102), Cultivation, Tier 4 / Indoor

x. Humboldt Masters, LLC (#MPN281467), Product Manufacturer

- Director Potvin presented the Staff Recommendation for both Humboldt Masters, LLC provisional licenses.
- Commissioner Flanagan requested a condition.
 - Proposed condition: provide a revised positive impact plan and specifically include which organizations they will be donating to and remove the section that describes attaining Social Justice Leader Status. This is not an appropriate action for the positive impact plan.
- The Chairman asked for questions and comments then asked for a motion to approve both of the provisional licenses, subject to the conditions requested by Commissioner Flanagan.
- Commissioner McBride moved to approve both of the provisional licenses, subject to the conditions requested by Commissioner Flanagan.
- Commissioner Doyle seconded the motion.
- The Commission unanimously approved both of the provisional licenses, subject to the conditions requested by Commissioner Flanagan.

y. Liberty Compassion, Inc. (#MCN282178), Cultivation, Tier 2 / Indoor

z. Liberty Compassion, Inc. (#MPN281752), Product Manufacturer

- The Chairman noted that this was an expedited application based on their DBE status.
- Director Potvin presented the Staff Recommendation for both Liberty Compassion, Inc. provisional licenses.
- Commissioner Title requested a condition.
 - Proposed condition: revise diversity plan to include measurable goals.
- The Chairman asked for questions and comments then asked for a motion to approve both of the provisional licenses, subject to the condition requested by Commissioner Title.
- Commissioner Doyle moved to approve both of the provisional licenses, subject to the condition requested by Commissioner Title.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously approved both of the provisional licenses, subject to the condition requested by Commissioner Title.

aa. Massmedicum Corp. (#MCN281929), Cultivation, Tier 7 / Indoor
(considered with applications (cc) and (dd) below)

- Director Potvin presented the Staff Recommendation for all four Massmedicum Corp. provisional licenses, subject to two votes.

bb. Massmedicum Corp. (#MPN281687), Product Manufacturer

- The Chairman noted that this was an expedited application based on their DBE status.



- Director Potvin presented the Staff Recommendation for both Liberty Compassion, Inc. provisional licenses.
- Commissioner Title requested a condition:
 - Proposed condition: revise diversity plan goal to hire 5% women to be objectively reasonable.
- Commissioner McBride requested a condition.
 - Proposed condition: ensure that Commission inspectors review packaging for powdered drink mix (e.g. fruit punch, grape, lemon-lime, orange) prior to being offered for sale.
- The Chairman asked for questions and comments then asked for a motion to approve provisional license, subject to the conditions requested by Commissioners McBride and Title.
- Commissioner Title moved to approve the provisional license, subject to the conditions requested by Commissioners McBride and Title.
- Commissioner Doyle seconded the motion.
- The Commission unanimously approved the provisional license, subject to the conditions requested by Commissioners McBride and Title.

cc. Massmedicum Corp. (#MRN282715), Retail

dd. Massmedicum Corp. (#MRN283004), Retail

- Commissioner Title requested a condition
 - Proposed condition: revise diversity plan goal to hire 5% women to be objectively reasonable.
- The Chairman asked for questions and comments then asked for a motion to approve three of the provisional licenses (all but Product Manufacturer), subject to the condition requested by Commissioner Title.
- Commissioner Doyle moved to approve three of the provisional licenses (all but Product Manufacture), subject to the condition requested by Commissioner Title.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved three of the provisional licenses (all but Product Manufacturer), subject to the condition requested by Commissioner Title.

ee. Royalty Group, LLC (#MRN282088), Retail

- The Chairman noted that this was an expedited application due to DBE status.
- Director Potvin presented the Staff Recommendation provisional licenses.
- The Chairman asked for questions and comments then asked for a motion to approve the provisional license.
- Commissioner Title moved to approve the provisional license.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license.

ff. Suns Mass II, LLC (#MRN281816), Retail

- Director Potvin presented the Staff Recommendation for. provisional licenses.



- Commissioner Title requested a condition.
 - Proposed condition: revise diversity plan goal to hire 5% women to be objectively reasonable.
- The Chairman asked for questions and comments then asked for a motion to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Title moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Doyle seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title

gg. Suns Mass, LLC (#MCN281732) Cultivation, Tier 8 / Indoor

- Director Potvin presented the Staff Recommendation provisional license.
- Commissioner Title requested a condition.
 - Proposed condition: revise diversity plan goal to hire 5% women to be objectively reasonable.
- The Chairman asked for questions and comments then asked for a motion to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Flanagan moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

hh. Supercritical Mass Laboratories, Inc. (#MPN281321), Product Manufacturer

- Director Potvin presented the Staff Recommendation provisional license.
- Commissioner McBride requested a condition.
 - Proposed condition: product description states an offer of a wide range of pharmaceutical grade safe, consistent, and effective distilled oils and infused products for the marijuana patients and recreational consumers of Massachusetts. Provide in writing what is meant by “pharmaceutical grade” and, if it is associated with potency, what is the expected potency in products considered pharmaceutical grade
- Commissioner Doyle commented that the name of the applicant refers to laboratories and Commissioner Doyle is concerned that the name is confusing or misleading given that there is a license type for laboratories. Commissioner Doyle said she is not proposing a condition but wants to flag this concern for the applicant as an issue to consider.
- The Chairman asked for questions and comments then asked for a motion to approve the provisional license, subject to the condition requested by Commissioner McBride.
- Commissioner Flanagan moved to approve the provisional license, subject to the condition requested by Commissioner McBride.
- Commissioner Title seconded the motion.



- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner McBride.

ii. The Botanist, Inc. (#MRN282160), Retail

jj. The Botanist, Inc. (#MRN282186), Retail

- The Chairman noted that this application was on the February meeting agenda and was tabled until today.
- Director Potvin presented the Staff Recommendation for both The Botanist, Inc. provisional licenses.
- Commissioner Title had questions for Enforcement Counsel Payer. First, Commissioner Title acknowledged the work that went into the application since the February meeting and thanked the staff for their work and the applicant for their cooperation. Commissioner Title noted that the applicant was responsive and cooperative, and she recognized the effort that it took to accomplish such progress.
- Commissioner Title asked Enforcement Counsel if this was a case of first impression.
 - Enforcement Counsel Payer said that the questions that were raised in the course of the investigation, in particular taking into account the November amendment to the regulations with respect to Ownership and Control, were unique in nature.
- Commissioner Title asked about the resources that the Commission expended to deal with this application and asked Enforcement Counsel Payer to comment on the time and whether he would characterize this as a significant dedication of staff time.
 - Enforcement Counsel Payer said it was a significant amount of time of Enforcement Counsel, Chief of Investigations and Enforcement and investigations staff going back to the spring of 2019. This included investigation conferences, reviewing documentation, and developing investigative findings. Each of those stages required dedicated staff time.
- Commissioner Title further commented that the Commission is making progress, but she still has concerns with respect to this application, in particular with respect to whether controlling relationships were properly disclosed as such, especially given the change in regulations, public discussions, and the ability for an applicant to know what the parameters and definitions with respect to control and ownership are. These were concerns raised previously and not addressed. Commissioner Title said she is also interested in how the Commission's actions would incentivize or disincentivize the proper disclosure of relationships.
- Commissioner Title noted she is also concerned about the amount of staff time dedicated to this application as a result of the initial disclosure by the applicant, noting that the licensing and enforcement team is tasked with so much else, including the public health emergency, inspections, and other resources.
- Commissioner Title expressed concern that voting to advance these applications might encourage other applicants to take similar action with respect to controlling relationships, requiring a similar devotion of staff resources.
- Given the significant nature of controlling relationships and the use of staff resources, Commissioner Title said she thinks these applications need further consideration in particular with respect to the initial disclosure of controlling relationships.



- Commissioner McBride asked Enforcement Counsel to give a ballpark guess, comparing before and after the recent amended regulations, the amount of time spent on investigating control of ownership.
 - Enforcement Counsel Payer stated that it would be difficult to give an accurate answer off the cuff, but noted that within the investigations department, a financial task force has been organized and the Commission has engaged Citrin Cooperman to assist with that work, but the changes included in the regulation amendment as of November 2019 did provide greater clarity and aided the investigations team in their work.
- Commissioner Title asked Enforcement Counsel Payer to discuss his comfort with coming back to with a recommendation to address the concerns expressed.
 - Enforcement Counsel Payer said the concerns with respect to control and ownership have been addressed as a result of amendments to the relationship, but that the enforcement staff could provide recommendations with respect to the initial disclosure.
- Commissioner Doyle thanked Commissioner Title and asked for clarity with respect to the actions being considered, confirming that the initial disclosure of the potential ownership and control issues is something that needs to be considered, separate and distinct from whether the issues of ownership and control have been resolved, when considering whether to grant these licenses.
- Commissioner Title noted that the concerns about the initial disclosure itself have not been addressed and Commissioner Title would like to see that addressed before considering the applications.
- Commissioner Title moved to table the application and consider a recommendation from enforcement staff with respect to the initial disclosure.
- Commissioner McBride seconded the motion.
- The Commission approved the motion by a vote of three in favor (Doyle, McBride, Title) and two against (Flanagan and Hoffman).

kk. The Old Bank, LLC (#MRN282467), Retail

- Director Potvin presented the Staff Recommendation for the provisional license.
- The Chairman asked for questions and comments then asked for a motion to approve the provisional license.
- Commissioner Flanagan applauded the applicant's creativity in making a positive impact to an area of disproportionate impact, given the closest ADI is 50 miles away.
- Commissioner McBride moved to approve the provisional license.
- Commissioner Doyle seconded the motion.
- The Commission unanimously approved the provisional license.

ll. Tigertown, LLC (#MRN282818), Retail

- The Chairman noted that this was an expedited application due to DBE status.
- Director Potvin presented the Staff Recommendation for the provisional licenses.



- The Chairman asked for questions and comments then asked for a motion to approve the provisional license.
 - Commissioner Doyle moved to approve the provisional license.
 - Commissioner Title seconded the motion.
 - The Commission unanimously approved the provisional license.
- mm. Tower Three, LLC (#MCN281652), Cultivation, Tier 2 / Indoor
- Director Potvin presented the Staff Recommendation for the provisional license.
 - The Chairman asked for questions and comments then asked for a motion to approve the provisional license.
 - Commissioner Flanagan wanted to highlight for the applicant the advertising requirements in the Commission’s regulations when sponsoring golf tournaments and 5k races.
 - Commissioner Flanagan moved to approve the provisional license.
 - Commissioner McBride seconded the motion.
 - The Commission unanimously approved the provisional license.
- nn. Treeworks of Massachusetts, LLC (#MPN281343), Product Manufacturer
- Director Potvin presented the Staff Recommendation for both the provisional license.
 - Commissioner McBride requested a condition.
 - Currently security plan states “tree works will also implement policies and procedures for situations following inadvertent diversion or loss of marijuana and marijuana products.” Prior to licensure applicant needs to provide written policies and procedures for inadvertent diversion or loss of marijuana products (would be good if they linked it to preventive measures).
 - Commissioner McBride further noted that the applicant’s dark chocolate products include “with mint and Oreos.” Oreos is a trademarked name, so applicant should be aware of that in developing packaging and marketing for these products.
 - The Chairman asked for questions and comments then asked for a motion to approve the provisional license, subject to the condition requested by Commissioner McBride.
 - Commissioner Doyle moved to approve the provisional license, subject to the condition requested by Commissioner McBride.
 - Commissioner Title seconded the motion.
 - The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner McBride.
- oo. Wellman Farm, Inc. (#MPN281317), Product Manufacturer
- The Chairman noted that this was an expedited application due to DBE status.
 - Director Potvin presented the Staff Recommendation for the provisional license.
 - The Chairman asked for questions and comments then asked for a motion to approve the provisional license.
 - Commissioner Doyle moved to approve the provisional license.
 - Commissioner Flanagan seconded the motion.



- The Commission unanimously approved the provisional license.
- The chairman thanked Director Potvin and Enforcement Counsel Payer and all the staff that have worked and supported the Commission's business and the overall industry.
- Commissioner Doyle moved to recess.
- Commissioner McBride seconded the motion.
- The Commission unanimously voted to take a recess.

9. Commission Discussion and Votes

a. Delegation of Authority: Applications for Energy Extensions

- Commissioner Doyle noted that in the most recent change in regulation, there was a mechanism by which licensees could apply for an extension of time for complying with energy and environmental requirements, which is different than a waiver. As extension applications come in, it is clear that the Executive Director needs delegated authority from the Commission to grant those extensions in a timely manner.
- Commissioner Doyle moved to delegate to the Executive Director the authority to grant Energy Extensions as they come in and as he sees appropriate.
- Commissioner Flanagan seconded the motion.
- The commission unanimously voted to delegate authority to the Executive Director to grant extension applications.

b. Update: Best Management Practices for Water Usage

- Commissioner Doyle gave an overview of Best Management Practices for Water Usage, which included a standard from water usage studies that said 6 gallons of water per plant per day. Advocates came forward and demonstrated that the 6-gallon standard was based on conditions outside of Massachusetts. Commissioner Doyle is therefore asking the Commission for permission to change this standard. Commissioner Doyle also thanked the advocates for the change for doing so with reliable data to demonstrate the point.
- Commissioner Doyle moved to delete the reference to "6 gallons per day per plant" and language around it in the Best Management Practices for Water Usage, as determined by Commissioner Doyle and staff working on it.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the motion.

10. New Business that the Chairman did not anticipate at time of posting

- Commissioner McBride proposed that the Commission draft a letter to the Massachusetts congressional delegation to have marijuana industry included in federal relief legislation, which may be needed as a result of the impacts of the economic impacts of Covid-19. Commissioner McBride volunteered to draft the letter and work with staff to finalize it.
- Commissioner Title supported the idea and offered assistance in drafting such a letter.
- The Chairman asked whether the Commission would reconvene to vote on the final letter.
- Commissioner McBride proposed that the letter would be drafted and would lean on staff to circulate and get comment and address the comments.



- The Chairman noted that this is a timely issue and would hope that it be drafted and sent prior to the next meeting, without violating public meeting laws.
- Commissioner McBride moved the commission draft a letter to the Massachusetts congressional delegation advocating for federal assistance for the Commission's licensees.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the motion.

11. Next Meeting Date

- May 7, 2020
- The Chairman noted that we currently plan to hold the meeting at the Commission's headquarters, but that is obviously subject to unfolding circumstances surrounding the public health emergency.

12. Adjournment

- Commissioner Flanagan moved to adjourn the meeting.
- Commissioner Doyle seconded the motion.
- The Commission unanimously voted to adjourn.



CANNABIS CONTROL COMMISSION

**June 4, 2020
10:00AM**

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

PUBLIC MEETING MINUTES

Documents:

- Meeting minutes for May 7, 2020 public meeting.
- Job Description for Data Manager
- Application materials for the following applications:
 - 1Connection Corporation
 - Berkshire Roots, Inc.
 - Bountiful Farms, Inc.
 - LDE Holdings, LLC
 - Phytotherapy, Inc.
 - Sira Naturals, Inc
 - Bountiful Farms, Inc.
 - GreenCare Therapeutics, Inc.
 - Mission MA, Inc. (#MCR139876)
 - Mission MA, Inc. (#MPR243519)
 - Mission MA, Inc. (#MRR205581)
 - Commcan, Inc. (#MRR205584)
 - Sira Naturals, Inc (#MCR139878)
 - INSA, Inc. (#MRR205583)
 - Theory Wellness Inc. (#MRR205590)
 - Cresco HHH, LLC (#MRR205585)
 - Cresco HHH, LLC (#MCR139877)
 - Cresco HHH, LLC (#MPR243520)
 - 4 Bros, Inc., Vertically Integrated Medical Marijuana Treatment Center
 - The Botanist, Inc. (#RMD905)
 - Alternative Therapies Group, Inc. (#RMD065)
 - Alternative Therapies Group, Inc., Vertically Integrated Medical Marijuana Treatment Center
 - Garden Remedies, Inc. (#RMD202)



- In Good Health, Inc. (#RMD105)
- Sira Naturals, Inc (#RMD245)
- Sira Naturals, Inc (#RMD325)
- Debilitating Medical Condition Treatment Centers, Inc., Vertically Integrated Medical Marijuana Treatment Center
- Pharmacannis Massachusetts, Inc. (#RMD805)
- Temescal Wellness of MA Inc. (#RMD965)
- Temescal Wellness of MA Inc. (#RMD705)
- Temescal Wellness of MA Inc. (#RMD985)
- 27 Broom Street, LLC (#MC281723), Cultivation, Tier 10 / Outdoor
- Atlantic Medicinal Partners, Inc. (#MC281476), Cultivation, Tier 2 / Indoor
- Atlantic Medicinal Partners, Inc. (#MP281630), Product Manufacturer
- Atlantic Medicinal Partners, Inc. (#MR281471), Retail
- Berkshire Roots, Inc. (#MR281845), Retail
- Resinate, Inc. (#MR281249), Retail
- Sanctuary Medicinals, LLC (#MR281950), Retail
- Wiseacre Farms, Inc. (#MCN281406), Cultivation, Tier 1 / Outdoor
- 4 Bros, Inc. (#RMD1325), Vertically Integrated Medical Marijuana Treatment Center
- Atlantic Medicinal Partners, Inc. (#RMD1506), Vertically Integrated Medical Marijuana Treatment Center
- ACK Natural, LLC (#MCN281850), Cultivation, Tier 1 / Indoor
- ACK Natural, LLC (#MPN281557), Product Manufacturer
- ACK Natural, LLC (#MRN282038), Retail
- Analytics Lab, LLC (#ILN281280), Independent Testing Laboratory
- Aries Laboratories, LLC (#ILN281325), Independent Testing Laboratory
- Ascend Mass, LLC (#MRN282837), Retail
- Bare Naked Greens LLC (#MCN282404), Cultivation, Tier 3 / Indoor
- Bare Naked Greens LLC (#MPN281761), Product Manufacturer
- Blue Collar Botany Corp. (#MCN281751), Cultivation, Tier 1 / Indoor
- Blue Collar Botany Corp. (#MPN281520), Product Manufacturer
- BOSTICA, LLC (#MCN282139), Cultivation, Tier 4 / Indoor
- BOSTICA, LLC (#MPN281664), Product Manufacturer
- Bud's Goods & Provisions Corp. (#MRN282410), Retail
- Buudda Brothers, LLC (#MCN281939), Cultivation, Tier 1 / Indoor
- Buudda Brothers, LLC (#MPN281585), Product Manufacturer
- Buudda Brothers, LLC (#MRN282225), Retail
- CCE CAT, LLC (#MPN281673), Product Manufacturer
- Clean Technique, LLC (#MPN281479), Product Manufacturer
- Commonwealth Farm 1761, Inc. (#MCN281922), Cultivation, Tier 11 / Indoor
- Commonwealth Farm 1761, Inc. (#MPN281571), Product Manufacturer
- Community Care Collective, Inc. (#MRN282974), Retail
- DM Distribution, LLC (#MXN281355), Transporter with Other ME License
- Elevated Roots, LLC (#MRN283092), Retail



- Emerald Grove, Inc. (#MRN282808), Retail
- Frozen 4 Corporation (#MPN281749), Product Manufacturer
- Frozen 4 Corporation (#MRN282881), Retail
- Frozen 4 Corporation (#MXN281357), Transporter with Other ME License
- Glacier Rock Farm, Inc. (#MCN282137), Cultivation, Tier 3 / Indoor
- Glacier Rock Farm, Inc. (#MPN281710), Product Manufacturer
- Green Gold Group, Inc. (#MCN281649), Cultivation, Tier 7 / Indoor
- Green Gold Group, Inc. (#MPN281456), Product Manufacturer
- Green Gold Group, Inc. (#MRN281791), Retail
- Green River Cannabis Company, Inc. (#MRN282175), Retail
- Hennep Cultivation, LLC (#MCN282282), Cultivation, Tier 6 / Indoor
- Hennep Cultivation, LLC (#MPN281766), Product Manufacturer
- Holistic Health Group, Inc (#MCN282431), Cultivation, Tier 3 / Indoor
- Holistic Health Group, Inc (#MCN282488), Cultivation, Tier 5 / Outdoor
- Iron Express, Inc. (#MRN282424), Retail
- J-B.A.M., Inc. (#MCN282510), Cultivation, Tier 1 / Indoor
- Life Essence, Inc. (#MCN281999), Cultivation, Tier 9 / Indoor
- Life Essence, Inc. (#MPN281624), Product Manufacturer
- Life Essence, Inc. (#MRN282981), Retail
- Major Bloom, LLC (#MRN281759), Retail
- Massbiolytics Corp. (#ILN281290), Independent Testing Laboratory
- Mayflower Medicinals, Inc. (#MRN282155), Retail
- Metro Harvest, Inc. (#MRN282659), Retail
- Metro Harvest, Inc. (#MRN282743), Retail
- PHA Industries, Inc. (#MPN281383), Product Manufacturer
- Pure Botanicals, LLC (#MCN281770), Cultivation, Tier 1 / Indoor
- Pure Botanicals, LLC (#MRN281951), Retail
- QPS Massachusetts Holdings, Inc. (#MCN281517), Cultivation, Tier 4 / Indoor
- QPS Massachusetts Holdings, Inc. (#MPN281696), Product Manufacturer
- Resinate, Inc. (#MRN282399), Retail
- Stafford Green, Inc. (#MCN281964), Cultivation, Tier 5 / Outdoor
- The Haven Center, Inc. (#MRN282581), Retail
- Wellman Farm, Inc. (#MCN282513), Cultivation, Tier 10 / Outdoor
- Witch City Gardens, LLC (#MCN281615), Cultivation, Tier 3 / Indoor
- Witch City Gardens, LLC (#MRN281663), Retail
- Updated Equity Guidance
 - Minimum Age Requirement for Persons in Vehicles during Curbside Delivery
- Research Report: Public Awareness Campaign
- Executive Director's Report PowerPoint Presentation.

In Attendance:

- Chairman Steven Hoffman



- Commissioner Jennifer Flanagan
- Commissioner Britte McBride
- Commissioner Shaleen Title

Minutes:

1) Call to Order

- The Chairman recognized a quorum and called the meeting to order.

2) Chairman's Comments and Updates

- The Chairman wished health and safety of everyone and their families.
- The Chairman expressed his thanks to Chief of Staff Erika Scibelli and staff for their work organizing the meeting and its materials.
- The Chairman gave an overview of the agenda and noted that there was an agenda item that was not contemplated when the agenda was set, which will be done in executive session and the Commission will adjourn from executive session.

3) Minutes for Approval

- The Chairman noted that there were minutes from the May 7, 2020 meeting and asked for questions and comments.
- Commissioner Title moved to approve the minutes from the May 7, 2020 meeting.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the minutes from the May 7, 2020 meeting.

4) Executive Director's Report

a. Highlights from Licensing Data**

- The Executive Director gave highlights of the traditional data report.
 - 26 applications awaiting first review, which is down from last month and shows the Commission's progress working through that queue.
 - 58 applications awaiting Commission review, which is a record for the Commission to consider at a single meeting.
 - 89 applications awaiting 3rd party responses.
 - The Chairman asked if this puts the Commission in compliance with the goal of completing initial review within 6 months.
 - The Executive Director said he would be pleased if that were the case but does not want to declare this goal complete quite yet, given new application types will be entering the queue soon, which may impact this progress.

b. Update: Product Catalogue



- The Executive Director gave an overview of the Product catalog project, which is currently voluntary, but may become mandatory whereby licensees can fill out the listing of their products in Metrc.
- The Executive Director said this type of information would have been helpful in the past when going through the vape quarantine. This information would not have replaced the need for testing but would have been a helpful tool and would have reduced the volume of testing.
- Commissioner McBride said that it is anticipated that this would become a regulatory requirement in the future. Commissioner McBride said that she is impressed by the work of staff putting this work together to get this feature up and running. Namely Alisa Stack, David McKenna, Chantelle Porter, Katherine Binkoski, Phil Beabout, and Yaw Gyebi. This will likely be rolled out in phases. There is a lot that will be included in the catalog that will be useful to many different audiences, including researchers, healthcare providers. Commissioner McBride also expressed her excitement that this would be coming online.

c. Update: Pediatric Applications

- At the last meeting, the Executive Director noted the new patient portal, including the pediatric patient application. The patient portal has been instrumental in reducing backlogs. The patient support team, led by Kathy Oliver-Jones, is making a monumental effort to respond to all patients. The pediatric patient application should be ready on or about the week of June 15.

d. Update: Return to the Office

- The Executive Director said that this topic is an ongoing conversation. The Commission does not have a date to return or formal plan to facilitate the transition back. The steps being taken to build a plan include reconfiguring office spaces if and where necessary. The most important consideration is that work is not the only priority of employees. So being aware of childcare coverage and the safety of field workers is paramount to this process.
 - The Executive Director stated that this is a thoughtful, cautious process that shouldn't be rushed, namely because the Commission is completely functional in this time, including hiring and onboarding some staff.
 - The Chairman echoed his support for cautious planning.
-
- The Executive Director gave an overview of updated cease and desist orders to allow curbside pickup and all of the adult use licensees have submitted Standard Operating Procedures for curbside. The licensees are required to submit these SOPs to the



Commission and the municipality in which they are located. It seems that there was a relatively smooth reopening of the industry.

- The Chairman asked if there is any sense of volume and how that compares to sales before the governor's order.
 - The Executive Director said the previous average weekly sales was \$13.2 million. Last week was approximately \$12.1 million. The caveat here is averaging of weeks may not show the ebb and flow of sales.
- The Chairman asked whether all adult retail stores have actually commenced operations.
 - The Executive Director said that all 45 licensed adult use retailers are open and running.

e. Job Description: Data Manager

- The Executive Director presented the job description for Data Manager position. Given how important data is to the Commission's mission and operations, this position will enable the Commission to do that even better. This position will manage data to support research, licensing, and enforcement operations.
- Commissioner Title asked, to the extent that the Commission mentions specific uses of data, there is a large amount of information through the Social Equity Programs and Positive Impact plan and that may be appropriate for that position as well.
 - The Executive Director agreed.
- Commissioner Title moved to approve the job description to post and hire.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously approved the job description.
- The Chairman asked for the timeline with respect to posting and hiring for the position.
 - The Executive Director said that Commission is working through several formerly posted jobs and would like to get this packaged and posted relatively quickly.

5) Staff Recommendations on Changes of Ownership

a. 1Connection Corporation

- Director Potvin presented the staff recommendation for Change of Ownership.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the Change of Ownership.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously approved the Change of Ownership.

b. Berkshire Roots, Inc.

- Director Potvin presented the staff recommendation for Change of Ownership.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the Change of Ownership.
- Commissioner McBride seconded the motion.



- The Commission unanimously approved the Change of Ownership.

c. Bountiful Farms, Inc.

- Director Potvin presented the staff recommendation for Change of Ownership.
- The Chairman asked for questions or comments.
- Commissioner Flanagan moved to approve the Change of Ownership.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the Change of Ownership.

d. LDE Holdings, LLC

- Director Potvin presented the staff recommendation for Change of Ownership.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the Change of Ownership.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously approved the Change of Ownership.

e. Phytotherapy, Inc.

- Director Potvin presented the staff recommendation for Change of Ownership.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the Change of Ownership.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the Change of Ownership.

f. Sira Naturals, Inc

- Director Potvin presented the staff recommendation for Change of Ownership.
- The Chairman asked for questions or comments.
- Commissioner Flanagan moved to approve the Change of Ownership.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the Change of Ownership.

6) Staff Recommendations on Changes of Location

a. Bountiful Farms, Inc.

- Director Potvin presented the staff recommendation for Change of Location.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the Change of Location.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously approved the Change of Location.

b. GreenCare Therapeutics, Inc.

- Director Potvin presented the staff recommendation for Change of Location.



- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the Change of Location.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the Change of Location.

7) Staff Recommendations on Renewals

- The Chairman noted that the Commission considers Renewals as a roster, unless specifically requested for individual consideration by a Commissioner. There will be four rosters: (1) Mission MA, Inc.; (2) all other adult-use
- Director Potvin presented the staff recommendation for Renewal.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the roster of Renewals.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously approved the Change of Location.

a. Mission MA, Inc. (#MCR139876)

b. Mission MA, Inc. (#MPR243519)

c. Mission MA, Inc. (#MRR205581)

- Commissioner Flanagan requested two conditions applying to all three Mission MA, Inc. Renewals.
 - Proposed conditions: (1) that within 90 days of the removal of the State of Emergency declaration all adult use licensees must notify the Cannabis Control Commission of updated actions taken on the Plans to Positively Impact Disproportionately Harmed People; and (2) Commissioner Flanagan moves that within 90 days of the removal of the State of Emergency declaration all adult use licensees must notify the Cannabis Control Commission of updated actions taken on the Diversity Plans.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the roster of Renewals, subject to the conditions requested by commissioner Flanagan.
- Commissioner Flanagan seconded the motion.
- The Commission voted to approve the roster of renewal by a vote of 3 in favor (Flanagan McBride, Hoffman) and one recusal (Title), subject to the conditions requested by Commissioner Flanagan.

d. Commcan, Inc. (#MRR205584)

e. Sira Naturals, Inc (#MCR139878)

f. INSA, Inc. (#MRR205583)



g. Theory Wellness Inc. (#MRR205590)

h. Cresco HHH, LLC (#MRR205585)

i. Cresco HHH, LLC (#MCR139877)

j. Cresco HHH, LLC (#MPR243520)

- Commissioner Flanagan requested two universal conditions:
 - Proposed conditions: (1) within 90 days of the removal of the State of Emergency declaration all adult use licensees must notify the Cannabis Control Commission of updated actions taken on the Plans to Positively Impact Disproportionately Harmed People; and (2) within 90 days of the removal of the State of Emergency declaration all adult use licensees must notify the Cannabis Control Commission of updated actions taken on the Diversity Plans.
- The Chairman asked for additional questions or comments.
- Commissioner McBride moved to approve the roster of Renewals, subject to the conditions requested by Commissioner Flanagan.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the roster of Renewals, subject to the conditions requested by Commissioner Flanagan.

k. 4 Bros, Inc., Vertically Integrated Medical Marijuana Treatment Center

l. The Botanist, Inc. (#RMD905)

m. Alternative Therapies Group, Inc. (#RMD065)

n. Alternative Therapies Group, Inc., Vertically Integrated Medical Marijuana Treatment Center

o. Garden Remedies, Inc. (#RMD202)

p. In Good Health, Inc. (#RMD105)

q. Sira Naturals, Inc (#RMD245)

r. Sira Naturals, Inc (#RMD325)

s. Debilitating Medical Condition Treatment Centers, Inc., Vertically Integrated Medical Marijuana Treatment Center

t. Pharmacannis Massachusetts, Inc. (#RMD805)

- Commissioner Title read the existing condition into the record for these licensees
 - Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.
- The Chairman asked for questions or comments.



- Commissioner Title moved to approve the roster of Renewals.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the roster of Renewals.

u. Temescal Wellness of MA Inc. (#RMD965)

v. Temescal Wellness of MA Inc. (#RMD705)

w. Temescal Wellness of MA Inc. (#RMD985)

- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the roster of Renewals.
- Commissioner Flanagan seconded the motion.
- The Commission voted to approve the roster of renewal by a vote of 3 in favor (Flanagan McBride, Hoffman) and one recusal (Title).

8) Staff Recommendations on Final Licenses

- The Chairman noted that the Commission considers final licenses as a roster, unless specifically requested for individual consideration by a Commissioner. These will be treated as a single roster.

a. 27 Broom Street, LLC (#MC281723), Cultivation, Tier 10 / Outdoor

b. Atlantic Medicinal Partners, Inc. (#MC281476), Cultivation, Tier 2 / Indoor

c. Atlantic Medicinal Partners, Inc. (#MP281630), Product Manufacturer

d. Atlantic Medicinal Partners, Inc. (#MR281471), Retail

e. Berkshire Roots, Inc. (#MR281845), Retail

f. Resinate, Inc. (#MR281249), Retail

g. Sanctuary Medicinals, LLC (#MR281950), Retail

h. Wiseacre Farms, Inc. (#MCN281406), Cultivation, Tier 1 / Outdoor

i. 4 Bros, Inc. (#RMD1325), Vertically Integrated Medical Marijuana Treatment Center

j. Atlantic Medicinal Partners, Inc. (#RMD1506), Vertically Integrated Medical Marijuana Treatment Center

- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the roster of final licenses.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the roster of final licenses.

9) Staff Recommendations on Provisional Licenses

- The Chairman noted that there were 55 total applications. The discussions will be per applicant, subject to separate votes.



- a. ACK Natural, LLC (#MCN281850), Cultivation, Tier 1 / Indoor
- b. ACK Natural, LLC (#MPN281557), Product Manufacturer
- c. ACK Natural, LLC (#MRN282038), Retail
 - The Chairman requested, in agreement with the applicant, that these applications will be tabled until a later date. The Chairman asked for objection.
- d. Analytics Lab, LLC (#ILN281280), Independent Testing Laboratory
 - The Chairman noted that this was an expedited applicant based on license type.
 - Director Potvin presented the staff recommendation for provisional license.
 - Commissioner McBride requested a condition, noting that Section 1 of 94G requires independence of a laboratory testing; therefore, the line of credit plan raises some concerns with respect to this proscription.
 - Prior to final licensure the applicant shall provide additional information regarding it's the provision in its Diversity Plan to provide lines of credit to Marijuana Establishment's for testing services. Additional information shall include the terms of the lines of credit and the applicant's plan to ensure no conflict of interest exists between it and ME's potentially receiving the line of credit. The Chairman asked for additional questions or comments.
 - Commissioner Flanagan moved to approve the provisional license, subject to the condition requested by Commissioner McBride.
 - Commissioner Title seconded the motion.
 - The Commission unanimously approved the provisional license subject to the condition requested by Commissioner McBride.
- e. Aries Laboratories, LLC (#ILN281325), Independent Testing Laboratory
 - The Chairman noted that this was an expedited applicant based on license type.
 - Director Potvin presented the staff recommendation for provisional license.
 - The Chairman asked for questions or comments.
 - Commissioner McBride moved to approve the provisional license.
 - Commissioner Flanagan seconded the motion.
 - The Commission unanimously approved the provisional license.
- f. Ascend Mass, LLC (#MRN282837), Retail
 - Director Potvin presented the staff recommendation for provisional license.
 - The Chairman asked for questions or comments.
 - Commissioner Title moved to approve the provisional license.
 - Commissioner McBride seconded the motion.
 - The Commission approved the provisional license by a vote of 3 in favor (McBride, Title, Hoffman) and one abstention (Flanagan).



g. Bare Naked Greens LLC (#MCN282404), Cultivation, Tier 3 / Indoor

- Director Potvin presented the staff recommendation for both provisional licenses, subject to separate votes.
- Commissioner Title commented on the Positive Impact Plan, which was one of several applicants that listed clean up events as the entirety of the positive impact plan, which may technically satisfy the requirements, but Commissioner Title noted she would expect that documentation would show that these were significant events.
- The Chairman asked for additional questions or comments.
- Commissioner Flanagan moved to approve the provisional license.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license.

h. Bare Naked Greens LLC (#MPN281761), Product Manufacturer

- Commissioner McBride moved to approve the provisional license.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously approved the provisional license.

i. Blue Collar Botany Corp. (#MCN281751), Cultivation, Tier 1 / Indoor

- Director Potvin presented the Staff Recommendation for both Blue Collar Botany Corp, subject to separate votes.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the provisional license.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license.

j. Blue Collar Botany Corp. (#MPN281520), Product Manufacturer

- Commissioner Flanagan moved to approve the provisional license.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license.

k. BOSTICA, LLC (#MCN282139), Cultivation, Tier 4 / Indoor

- Director Potvin presented the Staff Recommendation for both BOSTICA, LLC applications, subject to separate votes.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the provisional license.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously approved the provisional license.



- l. BOSTICA, LLC (#MPN281664), Product Manufacturer
- Commissioner Title moved to approve the provisional license.
 - Commissioner McBride seconded the motion.
 - The Commission unanimously approved the provisional license.
- m. Bud's Goods & Provisions Corp. (#MRN282410), Retail
- Director Potvin presented the Staff Recommendation for provisional license.
 - The Chairman asked for questions or comments.
 - Commissioner McBride moved to approve the provisional license.
 - Commissioner Title seconded the motion.
 - The Commission unanimously approved the provisional license.
- n. Buudda Brothers, LLC (#MCN281939), Cultivation, Tier 1 / Indoor
- The Chairman noted that these three applications were expedited based on their Disadvantaged Business Enterprise (DBE) status.
 - Director Potvin presented the Staff Recommendation for all three Buudda Brothers, LLC applications, subject to separate votes.
 - The Chairman asked for questions or comments.
 - Commissioner Flanagan moved to approve the provisional license.
 - Commissioner McBride seconded the motion.
 - The Commission unanimously approved the provisional license.
- o. Buudda Brothers, LLC (#MPN281585), Product Manufacturer
- Commissioner Title moved to approve the provisional license.
 - Commissioner Flanagan seconded the motion.
 - The Commission unanimously approved the provisional license.
- p. Buudda Brothers, LLC (#MRN282225), Retail
- Commissioner McBride moved to approve the provisional license.
 - Commissioner Title seconded the motion.
 - The Commission unanimously approved the provisional license.
- q. CCE CAT, LLC (#MPN281673), Product Manufacturer
- Director Potvin presented the Staff Recommendation for provisional license.
 - Commissioner Title requested a condition:
 - Proposed condition: Revise diversity plan goal to employ "20% or more women and/or veterans in retail and management positions" to be clearer and objectively reasonable, and to address the following questions:
 - What is meant by "retail" positions for a product manufacturing license?



- Where the plan refers generically to job fairs and media that reach “women and veterans,” can the applicant demonstrate that the applicant has researched such resources and planned for participation in them?
- The Chairman asked for additional questions or comments.
- Commissioner Flanagan moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

r. Clean Technique, LLC (#MPN281479), Product Manufacturer

- The Chairman noted that this is an expedited applicant due to its DBE status.
- Director Potvin presented the Staff Recommendation for provisional license.
- Commissioner Title requested a condition.
 - Proposed condition: revise diversity plan goal to make best efforts to hire at least 15% employees that are “women and/or minorities” to be objectively reasonable.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

s. Commonwealth Farm 1761, Inc. (#MCN281922), Cultivation, Tier 11 / Indoor

- Director Potvin presented the Staff Recommendation for both Commonwealth Farm 1751, Inc. applications, subject to separate votes.
- Commissioner Title requested a condition.
 - Proposed condition: revise diversity plan goal to make best efforts to hire at least 15% employees that are “women and/or minorities” to be objectively reasonable.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

t. Commonwealth Farm 1761, Inc. (#MPN281571), Product Manufacturer

- Commissioner Title requested a condition.



- Proposed condition: revise diversity plan goal to make best efforts to hire at least 15% employees that are “women and/or minorities” to be objectively reasonable.
- Commissioner Flanagan moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

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- The Chairman asked for a motion to recess until 11:30a.
 - Commissioner Flanagan moved to recess for 15 minutes.
 - Commissioner McBride seconded the motion.
 - The Commission unanimously voted to recess for 15 minutes.
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u. Community Care Collective, Inc. (#MRN282974), Retail

- Director Potvin presented the Staff Recommendation for provisional license.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the provisional license.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license.

v. DM Distribution, LLC (#MXN281355), Transporter with Other ME License

- Director Potvin presented the Staff Recommendation for provisional license.
- The Chairman asked for questions or comments.
- Commissioner Flanagan moved to approve the provisional license.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license.

w. Elevated Roots, LLC (#MRN283092), Retail

- The Chairman noted that this is an expedited application based on DBE status.
- Director Potvin presented the Staff Recommendation for provisional license.
- Commissioner Flanagan requested a condition, noting that she supports the organization listed, but the Commission needs to understand how a donation to that organization fulfills the purpose of the positive impact.



- Proposed condition: clarify how a donation to the Crohn's and Colitis Foundation will directly benefit the identified targeted areas.
- The Chairman asked for additional questions or comments.
- Commissioner Title moved to approve the provisional license, subject to the condition requested by Commissioner Flanagan.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Flanagan.

x. Emerald Grove, Inc. (#MRN282808), Retail

- Director Potvin presented the Staff Recommendation for provisional license.
- Commissioner Title requested a condition.
 - Proposed condition: revise diversity plan goal to ensure at least 15% of staff will be women to be objectively reasonable.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

y. Frozen 4 Corporation (#MPN281749), Product Manufacturer

- The Chairman noted that this was a priority application due to applicant's status as an Economic Empowerment Priority Application.
- Director Potvin presented the Staff Recommendation for the first two Frozen 4 Corporation provisional licenses, subject to separate votes.
- Commissioner Title thanked the staff for including the percentage of ownership is for the applicant.
- The Chairman asked for questions or comments.
- Commissioner Flanagan moved to approve the provisional license.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license.

z. Frozen 4 Corporation (#MRN282881), Retail

- Commissioner Title moved to approve the provisional license.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license.

aa. Frozen 4 Corporation (#MXN281357), Transporter with Other ME License



- The Chairman noted that this was a priority application given the applicant's Economic Empowerment Priority Applicant status.
 - Director Potvin presented the Staff Recommendation for provisional license.
 - The Chairman asked for additional questions or comments.
 - Commissioner Flanagan moved to approve the provisional license.
 - Commissioner Title seconded the motion.
 - The Commission unanimously approved the provisional license.
- bb. Glacier Rock Farm, Inc. (#MCN282137), Cultivation, Tier 3 / Indoor
- Director Potvin presented the Staff Recommendation for both Glacier Rock Farm, Inc. provisional licenses, subject to separate votes.
 - The Chairman asked for questions or comments.
 - Commissioner McBride moved to approve the provisional license.
 - Commissioner Flanagan seconded the motion.
 - The Commission unanimously approved the provisional license.
- cc. Glacier Rock Farm, Inc. (#MPN281710), Product Manufacturer
- Commissioner Title moved to approve the provisional license.
 - Commissioner McBride seconded the motion.
 - The Commission unanimously approved the provisional license.
- dd. Green Gold Group, Inc. (#MCN281649), Cultivation, Tier 7 / Indoor
- Director Potvin presented the Staff Recommendation for the first two Green Gold Group, Inc. provisional licenses, subject to separate votes.
 - The Chairman asked for questions or comments.
 - Commissioner Flanagan moved to approve the provisional license.
 - Commissioner Title seconded the motion.
 - The Commission unanimously approved the provisional license.
- ee. Green Gold Group, Inc. (#MPN281456), Product Manufacturer
- Commissioner McBride moved to approve the provisional license.
 - Commissioner Flanagan seconded the motion.
 - The Commission unanimously approved the provisional license.
- ff. Green Gold Group, Inc. (#MRN281791), Retail
- Director Potvin presented the Staff Recommendation for provisional license.
 - The Chairman asked for questions and comments.
 - Commissioner McBride moved to approve the provisional license.
 - Commissioner Title seconded the motion.



- The Commission unanimously approved the provisional license.

gg. Green River Cannabis Company, Inc. (#MRN282175), Retail

- Director Potvin presented the Staff Recommendation for provisional license.
- Commissioner Title requested a condition.
 - Proposed condition: revise diversity plan goal to employ “20% or more women and/or veterans in retail and management positions” to be clearer and objectively reasonable, and to address the following question:
 - What is the basis for the indication that annual advertisements in the Hampshire Gazette are a way to target women and veterans?
- The Chairman asked for additional questions and comments.
- Commissioner Title moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

hh. Hennep Cultivation, LLC (#MCN282282), Cultivation, Tier 6 / Indoor

- Director Potvin presented the Staff Recommendation for both Hennep Cultivation, LLC provisional licenses, subject to separate votes.
- Commissioner Title requested a condition, noting that it is alright for applicants to rely on Diversity Plans from other applicants to develop their plan, but when copy and paste is used to result in sentences and reasoning that do not make sense, it demonstrates that there may have not been sufficient thought put into a plan that will have measurable results.
 - Proposed condition: revise diversity plan goal to employ “20% or more women and/or veterans in retail and management positions” to be clearer and objectively reasonable, and to address the following questions:
 - What is meant by “retail” positions for a cultivation and product manufacturing license?
 - What is the basis for the indication that annual advertisements in the Milford Daily News and The Franklin Wicked Local are a way to target women and veterans?
- The Chairman asked for questions and comments.
- Commissioner Flanagan moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.



ii. Hennep Cultivation, LLC (#MPN281766), Product Manufacturer

- Commissioner Title requested a condition, noting that it is alright for applicants to rely on Diversity Plans from other applicants to develop their plan, but when copy and paste is used to result in sentences and reasoning that do not make sense, it demonstrates that there may have not been sufficient thought put into a plan that will have measurable results.
 - Proposed condition: revise diversity plan goal to employ “20% or more women and/or veterans in retail and management positions” to be clearer and objectively reasonable, and to address the following questions:
 - What is meant by “retail” positions for a cultivation and product manufacturing license?
 - What is the basis for the indication that annual advertisements in the Milford Daily News and The Franklin Wicked Local are a way to target women and veterans?
- Commissioner McBride moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

jj. Holistic Health Group, Inc (#MCN282431), Cultivation, Tier 3 / Indoor

- The Chairman noted that these applications were priority applications as MTC Priority applicants.
- Director Potvin presented the Staff Recommendation for both Holistic Health Group, Inc. provisional licenses, subject to separate votes.
- Commissioner Title requested a condition.
- Commissioner Title requested a condition.
 - Proposed Condition: Revise diversity plan goal to hire at least 10% of employees who are Massachusetts residents and are minorities, persons with disabilities or women to be objectively reasonable.
- Commissioner Flanagan requested a condition.
 - Proposed condition: resubmit PIP to include more than a hiring plan.
- The Chairman asked for questions and comments.
- Commissioner Title moved to approve the provisional license, subject to the conditions requested by Commissioners Flanagan and Title.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license, subject to the conditions requested by Commissioners Flanagan and Title.

kk. Holistic Health Group, Inc (#MCN282488), Cultivation, Tier 5 / Outdoor



- The Chairman noted that this application received expedited review due to license type.
- Commissioner Title requested a condition.
 - Proposed Condition: Revise diversity plan goal to hire at least 10% of employees who are Massachusetts residents and are minorities, persons with disabilities or women to be objectively reasonable.
- Commissioner Flanagan requested a condition.
 - Proposed condition: resubmit PIP to include more than a hiring plan.
- Commissioner Flanagan moved to approve the provisional license, subject to the conditions requested by Commissioners Flanagan and Title.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license, subject to the conditions requested by Commissioners Flanagan and Title.

ll. Iron Express, Inc. (#MRN282424), Retail

- Director Potvin presented the Staff Recommendation for provisional license.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the provisional license.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license.

mm. J-B.A.M., Inc. (#MCN282510), Cultivation, Tier 1 / Indoor

- Director Potvin presented the Staff Recommendation for provisional license.
- Commissioner Flanagan requested conditions.
 - Proposed condition 1: redesign the educational seminars with respect to the following:
 - The topics presented to be discussed are topics that are appropriate for the Community Outreach Meeting which is required before licensure.
 - As stated from the Positive Impact Plan “will inform the community on the facts surrounding the company’s activities, cannabis use, and the industry at large, and will address misconceptions or fears that many may have concerning the Company’s community presence.”
 - Proposed condition 2: Provide more specifics on how many educational seminars will be held.
 - The Positive Impact Plan says that it “hopes” to hold seminars. Submit more concrete numbers of how many seminars will be held.
- The Chairman asked for additional questions or comments.
- Commissioner Flanagan moved to approve the provisional license, subject to the conditions requested by Commissioner Flanagan.
- Commissioner Title seconded the motion.



- The Commission unanimously approved the provisional license, subject to the conditions requested by Commissioner Flanagan.

nn. Life Essence, Inc. (#MCN281999), Cultivation, Tier 9 / Indoor

- Director Potvin presented the Staff Recommendation for the first two Life Essence, Inc. provisional licenses, subject to separate votes.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the provisional license.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously approved the provisional license.

oo. Life Essence, Inc. (#MPN281624), Product Manufacturer

- Commissioner Flanagan moved to approve the provisional license.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license.

pp. Life Essence, Inc. (#MRN282981), Retail

- Director Potvin presented the Staff Recommendation for provisional license.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the provisional license.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license.

qq. Major Bloom, LLC (#MRN281759), Retail

- The Chairman noted that this was a priority application due to the applicant's Economic Empowerment Priority Applicant status.
- Director Potvin presented the Staff Recommendation for provisional license.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the provisional license.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license.

rr. Massbiolytics Corp. (#ILN281290), Independent Testing Laboratory

- The Chairman noted that this was an expedited applicant based on license type.
- Director Potvin presented the Staff Recommendation for provisional license.
- Commissioner Flanagan requested a condition.
 - Proposed condition: provide clarity on how internship would work with a vocational school, to ensure that it does not include anyone under the age of 21.
- The Chairman asked for questions or comments.



- Commissioner Flanagan moved to approve the provisional license, subject to the condition requested by Commissioner Flanagan.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Flanagan.

ss. Mayflower Medicinals, Inc. (#MRN282155), Retail

- Director Potvin presented the Staff Recommendation for provisional license.
- Commissioner Title requested a condition.
 - Proposed condition: revise diversity goal plan to “make best efforts to hire at least 15% employees that are women and/or minorities” to be objectively reasonable.
- Commissioner Title also raised a concern with respect to an open labor complaint against this licensee for discussion with the Commission. Commissioner Title highlighted that under the Commission’s regulations, a person is not eligible for a marijuana license if they have an outstanding or unresolved criminal warrant. The reason Commissioner Title says this relevant is because there is an open complaint in an other agency in unlawful interference in union organization. Commissioner Title said that while there is merely an allegation, it may be valuable for the Commission to discuss whether labor complaints should have any effect on applicants with respect to suitability review. Commissioner Title proposed three options for how to proceed.
- Commissioner Flanagan commented that she thought this was a larger policy discussion for the Commission and perhaps should not have be discussed in the context of a single licensee. Commissioner Flanagan shared her concern that the Commission would be going beyond its bounds by considering an ongoing union grievance.
- Commissioner McBride said that complaints by employees should be taken seriously, but that the Commission should not be making any decisions on such a matter before the complaint is resolved under the administrative agency that is currently reviewing it. Commissioner McBride asked whether Commissioner Title is seeking a condition or more than that.
- Commissioner Title clarified that she is not pushing for any particular outcome but thinks this is an issue to be addressed. Commissioner Title also said that she would be inclined to add a condition that would require the applicant to provide the Commission with an update upon resolution of the grievance.
- The Chairman said he believes this is a policy discussion and he will ensure it ends up on an agenda in the future and asked Commissioner Title to make a motion.
- Commissioner Title moved to recess for 10 minutes
- Commissioner McBride seconded the motion.
- The Commission unanimously voted to recess for 10 minutes.



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- Commissioner McBride expressed her feeling of not having sufficient information in order to right size the level of concern or risk and asked whether anyone at the Commission read the complaint.
 - Director Potvin said he had not.
 - The Executive Director said that the enforcement department would be who would have seen it, but at this time, he was not in a position to confirm who might have read the complaint.
 - Commissioner McBride said that when it comes to suitability, it is hard to analogize with other disqualifying criteria, and therefore does not feel in a position to make a position due to lack of information.
 - The Chairman asked that this license be considered narrowly individually and consider the larger policy question second.
 - Commissioner Title shared Commissioner McBride's concerns with respect to a lack of information and the difficulty of analogy, which is what prompted Commissioner Title to raise the issue for discussion.
 - Commissioner Title amended her motion and moved to add the additional condition that:
 - Upon the Department of Labor Relations rendering a decision on the complaint at issue regarding its attempt to block unionization efforts, the entity must disclose that decision. If the entity is found in violation of any law, rule, or regulation, or is asked to comply with the terms of the decision, that it demonstrate to the Commission a plan to comply with any conditions, sanctions, or terms of the decision.
 - Commissioner Flanagan seconded the motion.
 - The Chairman asked for discussion.
 - Commissioner Flanagan asked for the publication information of the news story regarding the complaint and whether the issue was raised to licensing before the meeting.
 - Commissioner Title cited Worcester Magazine and confirmed she had raised it before the meeting.
 - Commissioner McBride offered an amendment to specify the complaint filed by local 1445 of UFCW.
 - Commissioner Title accepted Commissioner McBride's amendment and moved to add the additional condition that:
 - Upon the Department of Labor Relations rendering a decision on the complaint filed by the local 1445 branch of the UFCW regarding its attempt to block unionization efforts, the entity must disclose that decision. If the entity is found in violation of any law, rule, or regulation, or is asked to comply with the terms of



the decision, that it demonstrate to the Commission a plan to comply with any conditions, sanctions, or terms of the decision.

- Commissioner McBride seconded the motion.
- The Commission voted in favor of the motion by a vote of three in favor (McBride, Hoffman, Title) and one against (Flanagan).
- Commissioner Title moved to approve the provisional license, subject to the conditions requested by Commissioner Title.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license.

tt. Metro Harvest, Inc. (#MRN282659), Retail

- Director Potvin presented the Staff Recommendation for provisional license.
- Commissioner Flanagan requested a condition
 - Proposed condition: resubmit the Positive Impact Plan to include more than just a hiring plan.
- Commissioner Title requested a condition.
 - Proposed condition: Revise diversity plan goal to hire 20% women to be objectively reasonable.
- The Chairman asked for additional questions or comments.
- Commissioner McBride moved to approve the provisional license, subject to the conditions requested by Commissioners Flanagan and Title.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license, subject to the conditions requested by Commissioners Flanagan and Title.

uu. Metro Harvest, Inc. (#MRN282743), Retail

- Director Potvin presented the Staff Recommendation for provisional license.
- Commissioner Flanagan requested a condition
 - Proposed condition: resubmit the Positive Impact Plan to include more than just a hiring plan.
- Commissioner Title requested a condition.
 - Proposed condition: Revise diversity plan goal to hire 20% women to be objectively reasonable.
- The Chairman asked for additional questions or comments.
- Commissioner Title moved to approve the provisional license, subject to the conditions requested by Commissioners Flanagan and Title.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license, subject to the conditions requested by Commissioners Flanagan and Title.



vv. PHA Industries, Inc. (#MPN281383), Product Manufacturer

- Director Potvin presented the Staff Recommendation for provisional license.
- Commissioner Flanagan requested a condition.
 - Proposed condition: Clarify how many people will benefit from the programs stated.
 - In the Positive Impact Plan there are three goals and each goal states it will benefit 4 people. Will 12 people total benefit, or is each program benefitting the same 4 people?
- The Chairman asked for questions or comments.
- Commissioner Flanagan moved to approve the provisional license, subject to the condition requested by Commissioner Flanagan.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Flanagan.

ww. Pure Botanicals, LLC (#MCN281770), Cultivation, Tier 1 / Indoor

- Director Potvin presented the Staff Recommendation for both Pure Botanicals, LLC provisional licenses, subject to separate votes.
- Commissioner Title requested a condition.
 - Proposed condition: Revise diversity plan goal to employ “20% or more women and/or veterans in retail and management positions” to be clearer and objectively reasonable, and to address the following questions:
 - What is meant by “retail” positions for a cultivation license?
 - What is the basis for the indication that annual advertisements in the Athol Daily News and The Greenfield Recorder are a way to target women and veterans?
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

xx. Pure Botanicals, LLC (#MRN281951), Retail

- Commissioner Title requested two conditions.
 - Proposed condition: Revise diversity plan goal to employ “20% or more women and/or veterans in retail and management positions” to be clearer and objectively reasonable, and to address the following question:



- What is the basis for the indication that annual advertisements in the Athol Daily News and The Greenfield Recorder are a way to target women and veterans?
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

yy. QPS Massachusetts Holdings, Inc. (#MCN281517), Cultivation, Tier 4 / Indoor

- Director Potvin presented the Staff Recommendation for both QPS Massachusetts Holdings, Inc. provisional licenses, subject to separate votes.
- Commissioner Title requested a condition.
 - Proposed condition: revise diversity plan goal for 20% of its workforce to be comprised of women and minorities to be objectively reasonable.
- The Chairman asked for additional questions or comments.
- Commissioner Flanagan moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

zz. QPS Massachusetts Holdings, Inc. (#MPN281696), Product Manufacturer

- Commissioner Title requested a condition.
 - Proposed condition: revise diversity plan goal for 20% of its workforce to be comprised of women and minorities to be objectively reasonable.
- The Chairman asked for additional questions or comments.
- Commissioner McBride moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

aaa. Resinate, Inc. (#MRN282399), Retail

- Director Potvin presented the Staff Recommendation for provisional license.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the provisional license.
- Commissioner McBride seconded the motion.



- The Commission unanimously approved the provisional license.

bbb. Stafford Green, Inc. (#MCN281964), Cultivation, Tier 5 / Outdoor

- Director Potvin presented the Staff Recommendation for provisional license.
- Commissioner Title requested a condition.
 - Proposed condition: revise diversity plan goal to employ “20% or more women and/or veterans in retail and management positions” to be clearer and objectively reasonable, and to address the following questions:
 - What is meant by “retail” positions for a cultivation license?
 - What is the basis for the indication that annual advertisements in the Berkshire Eagle and Hampshire Gazette are a way to target women and veterans?
- The Chairman asked for additional questions or comments.
- Commissioner Flanagan moved to approve the provisional license, subject to the condition requested by Commissioner Title.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license, subject to the condition requested by Commissioner Title.

ccc. The Haven Center, Inc. (#MRN282581), Retail

- The Chairman noted that this application received priority review due to its MTC Priority Applicant status.
- Director Potvin presented the Staff Recommendation for provisional license.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the provisional license.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license.

ddd. Wellman Farm, Inc. (#MCN282513), Cultivation, Tier 10 / Outdoor

- The Chairman noted that this was an expedited application due to its DBE status and license type.
- Director Potvin presented the Staff Recommendation for provisional license.
- The Chairman asked for questions or comments.
- Commissioner Flanagan moved to approve the provisional license.
- Commissioner Title seconded the motion.
- The Commission unanimously approved the provisional license.

eee. Witch City Gardens, LLC (#MCN281615), Cultivation, Tier 3 / Indoor



- Director Potvin presented the Staff Recommendation for both Witch City Gardens, LLC provisional licenses, subject to separate votes.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the provisional license.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously approved the provisional license.

fff. Witch City Gardens, LLC (#MRN281663), Retail

- Commissioner Title moved to approve the provisional license.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the provisional license.

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- Commissioner McBride moved to take a 30 minute recess
 - Commissioner Flanagan seconded the motion.
 - The Commission unanimously voted to recess for 30 minutes.
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10) Commission Discussion and Votes

a. Updated Equity Guidance

- Commissioner Title noted that this new Equity Guidance doesn't add any new requirements. Rather it gives a big picture view of all Commission programs. It includes additional information for the Social Equity Program, and provides distinctions between DBE businesses, Economic Empowerment Priority Applicants, and Social Equity Program, and the benefits and requirements of each program. It also links to data published by the Commission's Research Department.
- Commissioner Title moved to approve the updated Equity Guidance.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the updated Equity Guidance.

b. Minimum Age Requirement for Persons in Vehicles during Curbside Delivery

- Commissioner Title noted that this is a situation where there may be no perfect answer, but wanted to have the discussion, as that may be helpful in and of itself and to ensure that the Commission is making an intentional decision.
- Commissioner Title wanted to raise the topic of curbside adult-use pickup and the requirement that every person in the car be 21 years old or older.



- Commissioner Title noted that it may be difficult for parents to have childcare in the current climate and that children in a car may be buckled in the back seat if they under the age at which they cannot be at home alone.
- Commissioner Flanagan said she appreciates Commissioner Title's comments and while Commissioner Flanagan understands the difficulty some parents may find themselves in, she does not feel that any person under the age of 21 should be in the car. Commissioner Flanagan said that this is not an essential product, like food. Commissioner Flanagan further noted that equity of access does not exist generally, given the limits on transportation and locations of stores. Commissioner Flanagan also highlighted that the Phase 2 of the Governor's plan to reopen starts this weekend, and this discussion may be moot come Saturday.
- Commissioner McBride noted that the 21 age restriction is clear in M.G.L c. 94G, § 4(a½) and the Commission's regulations, so Commissioner McBride believes it begins and ends with that restriction. Commissioner McBride also expressed her sympathy for those without strong childcare support, but the law is finite with regard to age restrictions.
- The Chairman echoed Commissioner McBride's comments with respect to the restrictions on age and access.
- Commissioner Title said that it was important to have the discussion in all of these unprecedented circumstances and the Commission needs to use its deliberative process to have these discussions and exercise its judgement, whatever the outcome. She noted that being able to openly discuss access for parents who use cannabis was progress.
- The Chairman agreed it is productive and important to have these conversations.

11) Research Report: Public Awareness Campaign

- Samantha M. Doonan and Dr. Julie Johnson presented the report on effectiveness on the More About Marijuana public awareness campaign.
- Commissioner Flanagan thanked the research and communications staff, namely Dr. Johnson, Samantha Doonan, Cedric Sinclair, and Maryalice Curley, for the work that has been done on this campaign. Commissioner Flanagan noted that the campaign is working and the neutral tone of the campaign that invites people in to get more information and this report shows that the money invested in the study was well spent and that this should be kept in mind from the outset.
- Commissioner Title said that she loved the report and felt it was very readable by a lay person. Commissioner Title said she admired the team and the way they went about it, identifying what people needed to know and not being judgmental and systematically recording what went into the report. Commissioner Title asked Director of Communications the next steps regarding youth education and home manufacturing.
 - Director Sinclair said that youth prevention and responsible use campaigns are currently live through out Massachusetts. In addition, a campaign is ongoing with respect to safe home manufacturing, continuing with the nonjudgmental tone that



provides crucial information while recognizing people's right to grow and manufacture at home, but to do so safely and warn about uneven distribution of cannabis oils in homemade edibles. The Commission also took the opportunity to ensure the information is timely and relevant and is building out elements of the campaign to cover the potential contaminants in non-regulated vapes as well as a responsible consumption and retail practices in the time of COVID-19 element to the campaign. One challenge has been relative to censorship issues on google, Google Ads, and YouTube with respect to advertisements placed by the Commission to distribute home manufacturing safety content. Therefore, the public should go to the Commission's moreaboutmj.com website or on the Commissions YouTube channel and view the content for its safety information.

- Commissioner McBride said the awareness campaign was thoughtful and successful, and it is something she talks about a lot and it gets a positive response.
- The Chairman also thanked the staff team that put this together and expressed his pride in the project.

12) Next Meeting Dates

- June 19, 2020, the Chairman gave an overview of the purpose of the policy meeting.
- June 25, 2020, the Chairman noted that this meeting was tentatively scheduled unless
- July 9, 2020, the Chairman noted that this would be a regularly scheduled meeting.

13) New Business that the Chairman did not anticipate at time of posting

- The Chairman moved under the Open Meeting Law, G.L. c. 30A, § 21(a)(4) and (7) and the Public Records Law, G.L. c. 66, and the exemptions set forth in G.L. c. 4, § 7(26)(d), (f), and (n), that the Commission enter into executive session to discuss investigations into licensed entities which have been recently vandalized, including security issues.
- Commissioner McBride seconded the motion.
- The Chairman noted that the meeting will adjourn from executive session
- The Commission unanimously voted to enter executive session and each Commissioner represented that they were alone, and no unauthorized person would be able to hear the discussion of executive session.

14) The Commission adjourned from Executive Session.









***Cannabis Control Commission
Job Description***

Department: Administration

Reports to: Chief of Staff

Job Title: Constituent Services Associate

FLSA Status: Non-Exempt

I. PURPOSE OF THE JOB

The Constituent Services Associate serves as a key voice of Commission, having frequent and essential contact (especially over the phone, but also via email and in person) with members of the Commission's constituency and the inquiring general public. Reporting to the Chief of Staff, this role advances the Commission's reputation and brand, ensures consistent and accurate information sharing and messaging, and leaves a positive impression on the constituent.

II. ESSENTIAL FUNCTIONS AND RESPONSIBILITIES

- Responsible for engaging constituents effectively in the work of the Commission and ensuring the Commission's constituent services is of the highest quality and integrity;
- Engage in inbound and outbound calls with constituents, including information requests, ensuring 100% accuracy, kind and responsive dialogue, and alignment with Commission policy;
- Track each call in the Commission's case management system and triage as required;
- Follow Commission protocol when dealing with constituent requests, questions, and engagement.
- Research and resolve constituent inquiries and concerns with follow-up via telephone, email or written correspondence to ensure a quality response and alignment with Commission policy;
- Coordinate with other Commission departments as necessary to provide accurate information and follow-up with constituents;
- Maintain a current set of FAQs for all staff use, ensuring consistent and appropriate responses to constituent inquiries;
- Share relevant information gathered from constituents with Chief of Staff for reporting to Commission leadership;

III. OTHER DUTIES AND RESPONSIBILITIES

- Maintain the highest standards of personal, professional and ethical conduct and support the Commission's goals for a diverse and culturally aware workforce; and
- Additional administrative support work for other departments as needed including



reception phone coverage, and all other duties as assigned.

IV. SKILLS AND BACKGROUND

- Exceptional character and professionalism;
- Compassionate and helpful demeanor;
- Ability to work independently and adapt in a rapidly changing environment;
- Excellent oral and written communications skills;
- Strong interpersonal skills and track record of relationship building;
- Ability to effectively prioritize and execute tasks in a fast-paced environment;
- Ability to contribute actively to a work environment that embraces diversity;
- Ability to build constructive working relationships characterized by a high level of acceptance, integrity, cooperation, and mutual regard;
- Ability to accept personal responsibility for the quality and timeliness of work, and for meeting expectations; and
- Ability to seek opportunities to resolve problems, achieve goals, or otherwise advance the Commission's mission.

V. EDUCATION AND EXPERIENCE

- Bachelor's degree required;
- Minimum of 2 years of experience in customer or constituent services support, general office or administrative support;
- Strong administrative and organizational skills with exceptional attention to detail;
- Proficiency in Microsoft Office with advanced knowledge of Power Point, Excel, and case management systems; and
- Demonstrated excellence in written and verbal communication skills.

VI. SALARY RANGE: \$40,000 - \$50,000



June __, 2020

Garden Remedies, Inc.
License No. MC281504
License No. MP281381

Case No. 2019A-0028-14

FINAL ORDER AND STIPULATED AGREEMENT

This Final Order and Stipulated Agreement (hereinafter, “Order”) between the Commonwealth of Massachusetts Cannabis Control Commission (the “Commission”) and Garden Remedies, Inc. (the “Respondent”) is offered for the purposes of settlement and to avoid the uncertainty and cost of future administrative action.

The Commission finds that resolution of this matter serves the purposes of 935 CMR 500.450 and 935 CMR 500.500 because Respondent has accepted responsibility for the violations set forth in this Order, has cooperated in the Commission’s investigation, has made efforts to remediate the cited violations, and has instituted reforms to improve company culture and operations.

Accordingly, the Commission and Respondent submit to and agree as follows:

1. The Cannabis Control Commission has jurisdiction over licensed marijuana establishments and licensed medical marijuana treatment centers and the subject matter herein pursuant to the provisions of the Commonwealth’s marijuana laws, M.G.L. Chapters 94G and 94I, and the Commission’s regulations, 935 CMR 500.000, *et seq.*, 935 CMR 501.000, *et seq.*, and 935 CMR 502.000, *et seq.*;
2. Respondent has been subject to an investigation conducted by the Commission’s investigators. The Commission alleges violations of the Commission’s regulations, 935 CMR 500.000, *et seq.*;
3. Pursuant to 935 CMR 500.360, the Commission may issue an order to show cause as to why a fine or other financial penalty against Respondent should not be imposed upon determining that Respondent’s acts or omissions have violated the Commonwealth’s marijuana laws. Such order to show cause can include an assessment of administrative fines, an order for corrective action, or both. 935 CMR 500.500 affords Respondent an

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opportunity to be heard and to show cause as to why adverse action taken pursuant to 935 CMR 500.360 should not be imposed;

4. On or around September 17, 2018, Respondent submitted applications for adult-use cultivation and adult-use product manufacturing licenses in connection with its premises located at 307 Airport Road, Fitchburg, Massachusetts (the “facility”);
5. Respondent received provisional licenses for both adult-use applications on or around December 13, 2018. Respondent’s adult-use cultivation license number is MC281504 and its adult-use product manufacturing license number is MP281381;
6. On January 11, 2019, Commission inspectors performed an Adult-Use Post-Provisional License Inspection at the facility in connection with Respondent’s adult-use cultivation and product manufacturing applications;
7. During the inspection, Commission inspectors found an EPA-registered pesticide, Wood’s Rooting Hormone, in one of the cultivation areas in the facility
8. During the inspection, Commission inspector Michael Yee (“Yee”) asked Respondent’s Chief Financial Officer to produce financial records including Respondent’s bank statements, payroll, general ledger, financial statements, and invoice documents;
9. On or around January 14, 2019, the Commission issued a Notice of Deficiency to Respondent citing its noncompliant use of pesticides. Respondent timely submitted a Plan of Correction and documented disposal of the pesticide found onsite by a third party contractor;
10. On January 15, 2019, Respondent’s Chief Financial Officer emailed Yee the financial records requested, including invoices documenting Respondent’s purchases of cultivation supplies from its vendor, Green Harvest Hydroponics (“Green Harvest”), during the time period of September–December 2018;
11. On or around March 7, 2019, Respondent received final licenses to operate adult-use cultivation and product manufacturing at the facility;
12. On or around April 19, 2019, the Commission authorized Respondent to commence adult-use cultivation and product manufacturing operations at the facility;
13. The Commission last approved renewal of Respondent’s License No. MC281504 and MP281381 by its notice dated December 23, 2019;
14. On or around April 20, 2019, Yee received a call from an anonymous employee complainant alleging that Respondent had committed fraudulent acts in connection with the records provided during its Adult-Use Post-Provisional License Inspection;
15. On or around April 25, 2019, the Commission initiated an investigation to review the records given to Yee by Respondent on January 15, 2019;
16. The Commission’s investigation concluded that the Green Harvest invoices sent by Respondent’s Chief Financial Officer on January 15, 2019 had been falsified to conceal



purchases of another EPA-registered pesticide, Clonex Rooting Gel (“Clonex”), made during the period of September–December 2018;

17. On or around July 15, 2019, the Commission issued a Notice of Deficiency to Respondent finding that the Green Harvest invoices produced by Respondent on January 15, 2019 were purposefully inaccurate or fraudulent;
18. On or around July 26, 2019, Respondent submitted a Plan of Correction admitting to its prior use of Clonex and notifying the Commission of corrective action measures taken in agreement with the Commission’s finding that fraudulent information had been provided;
19. Respondent’s corrective action plan included terminating its Director of Operations from employment, issuing a two-day unpaid suspension and final warning to the executive member responsible for supervising its Director of Operations, requiring Respondent’s Human Resources Director to report directly to the Chief Executive Officer, creating a Vice President of Operations position, and ending its business relationship with Green Harvest;

Applicable Law

20. Information provided by a Marijuana Establishment that was deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly, or by omission or ambiguity, in and of itself, constitutes full and adequate grounds for suspending or revoking a Marijuana Establishment license. *935 CMR 500.450(2)*;
21. A Marijuana Establishment’s failure to comply with any requirement of St. 2016, c. 334, as amended by St. 2017, c. 55, M.G.L. c. 94G or 935 CMR 500.000, or any applicable law or regulation, in and of itself, constitutes full and adequate grounds for suspending or revoking a Marijuana Establishment’s license. *935 CMR 500.450(3)*;
22. Application of Pesticides shall be performed in compliance with M.G.L. c. 132B and the regulations promulgated at 333 CMR 2.00 through 333 CMR 14.00. *935 CMR 500.120(5)*;
23. The cultivation process shall use best practices to limit contamination including, but not limited to, mold, fungus, bacterial diseases, rot, pests, Pesticides not in compliance with 935 CMR 500.120(5), mildew, and any other contaminant identified as posing potential harm. Best practices shall be consistent with state and local law including, but not limited to, the Commission’s Guidance on Integrated Pest Management. *935 CMR 500.120(9)*;
24. Pesticides means a substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, and any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant. *935 CMR 500.002*;



Stipulated Findings

25. The Commission, through its Executive Director, and Respondent have come to mutual agreement and understanding, and jointly propose to the Commission a resolution of the alleged violations in lieu of proceeding through an administrative hearing to determine the merits of such allegations. The terms and conditions of this Order and Stipulated Agreement are expressly subject to ratification of the Commission by majority vote of its Commissioners;
26. In lieu of proceeding with an administrative hearing and subsequent proceedings, Respondent further agrees to the stipulated findings set forth in Paragraphs 27–28, inclusive of all subparagraphs:
27. Respondent provided deceptive, misleading, false or fraudulent information, or information that tends to deceive or create a misleading impression, grounds for suspending or revoking Respondent’s license under 935 CMR 500.450(2):
 - a. On January 11, 2019, Commission inspectors performed an Adult-Use Post-Provisional License Inspection at the facility in connection with Respondent’s applications for adult-use cultivation and product-manufacturing licenses;
 - b. During the inspection, Yee asked Respondent’s Chief Financial Officer to produce financial records including Respondent’s bank statements, payroll, general ledger, financial statements, and invoice documents;
 - c. On January 15, 2019, Respondent’s Chief Financial Officer emailed Yee invoices regarding its purchase of cultivation products from its vendor, Green Harvest during the time period of September–December 2018 (the “digital invoices”);
 - d. After a reinspection on January 30, 2019, Commission inspectors determined Respondent compliant with 935 CMR 500.000 *et seq.* and recommended final licensure for License No. MC281504 and MP281381;
 - e. Respondent advanced in the application process. On or around April 16, 2019, Commission inspectors performed a Post-Final License Inspection and the Commission issued a Notice of Commence Operations dated April 19, 2019 permitting Respondent to begin adult-use cultivation and product manufacturing at the facility;
 - f. On or around April 20, 2019, Yee received a call from an anonymous employee complainant alleging that Respondent had manipulated the digital invoices submitted on January 15, 2019 in connection with its Post-Provisional License Inspection;
 - g. On April 29, 2019, Commission investigators conducted an unannounced inspection at the facility. During the inspection, investigators requested paper copies of Respondent’s Green Harvest invoices covering the same time period as the digital invoices submitted by Respondent’s Chief Financial Officer on January 15, 2019;
 - h. Commission investigators compared the paper invoices with the digital invoices and found that the paper invoices of purchases made in the months of October, November, and December 2018 differed from the digital invoices for that same time period;



- i. Respondent's financial accountant provided the financial department's record of Green Harvest invoices to investigators on April 29, 2019 (the "accounting invoices"). The accounting invoices spanned the time period of August 2016–March 2019;
- j. The digital invoices represented that Respondent had purchased two "Agrosun 100W Double Ended Bulb" for \$135.20 on October 31, 2018 ("Agrosun Bulb"), two Agrosun Bulbs for \$135.20 on November 30, 2018, and one Agrosun Bulb for \$135.20 on December 26, 2018;
- k. Under the same line item as the digital invoice dated October 1–November 1, 2018, the accounting invoice for the same period instead showed a purchase of two "Clonex Gel 1 Quart" for \$135.20 on October 31, 2018;
- l. Under the same line item as the digital invoice dated November 1–December 1, 2018, the accounting invoice for the same period instead showed a purchase of two "HydroDynamics Clonex Gel Quart (4/Cs)" for \$135.20 on November 30, 2018;
- m. Under the same line item as the digital invoice dated December 1, 2018–January 1, 2019, the accounting invoice for the same period instead showed a purchase of one "Clonex Gel 1 Quart" for \$135.20 on December 26, 2018;
- n. Clonex Rooting Gel is an EPA-registered pesticide and plant growth regulator (EPA Registration No. 79664-1) that is prohibited for use on cannabis;
- o. On May 8, 2019, Commission investigators visited Green Harvest to interview its owner. At that time, investigators requested Green Harvest's record of Respondent's invoices dating back to June 2018;
- p. On May 28, 2019, Green Harvest's owner declined to produce the invoices requested by investigators without specific authorization from the Respondent. Respondent authorized the owner of Green Harvest to provide the invoices to Commission investigators;
- q. On May 29, 2019, Respondent's attorney forwarded Commission investigator Eduardo Guardiola ("Guardiola") an email communication showing that Respondent's Director of Operations had sent the digital invoices to Respondent's Chief Financial Officer on January 14, 2019, the day before the Chief Financial Officer sent the digital invoices to Yee;
- r. On May 29, 2019, Respondent's also forwarded Guardiola an email communication showing that on January 2, 2019, Green Harvest's manager had sent the Director of Operations Respondent's monthly statement for the month of December 2018;
- s. According to that correspondence, the Director of Operations sent the same statement to Respondent's financial accountant who, in turn, sent the document to the Chief Financial Officer on February 1, 2019. Consistent with the accounting invoices, the December 2018 statement documented Respondent's purchase of Clonex on December 26, 2018;
- t. On June 3, 2019, Green Harvest's owner sent its invoices to Guardiola in response to the Commission's Request for Information. The invoices provided did not list Respondent's purchase of Clonex and appeared to match the digital invoices;



- u. On July 10, 2019, Commission investigators returned to the facility and interviewed Respondent's finance department. At that time, investigators obtained accounting statements of Respondent's Green Harvest purchases during the period of October–December 2018 directly from Respondent's payment processing software system;
 - v. The accounting statements from Respondent's payment processing software system documented its purchase of Clonex on October 31, 2018 and November 30, 2018;
 - w. As early as January 28, 2019, certain members of Respondent's executive-level staff were aware of the discrepancies between the digital invoices submitted to the Commission on January 15, 2019 and the accounting invoices. Respondent's executive staff did not inform the Commission of the discrepant documents;
28. Respondent performed noncompliant applications of pesticides in violation of 935 CMR 500.120(5):
- a. On January 11, 2019, Commission inspectors performed an Adult-Use Post-Provisional License Inspection of the facility in connection with Respondent's applications for adult-use cultivation and product-manufacturing licenses;
 - b. During the inspection, Commission inspectors discovered a bottle of Wood's Rooting Hormone in one of the cultivation areas of the facility;
 - c. Wood's Rooting Hormone is an EPA-registered pesticide (EPA Reg. No. 43905-1) and plant growth regulator that is prohibited for use on cannabis;
 - d. According to the product label, Wood's Rooting Hormone is permitted for use in greenhouses and nurseries. The product label directs users to dip cuttings to the desired rooting length and then place it into the propagation media;
 - e. During the inspection on January 11, 2019, Commission inspectors also requested Respondent's financial records, including invoices of its cultivation supply purchases from Green Harvest during September–December 2018;
 - f. The digital invoices provided by Respondent's Chief Financial Officer in response to the Commission's request had been falsified to conceal Respondent's purchases of Clonex;
 - g. Respondent's accounting invoices document a history of Clonex use dating back to December 2017;
 - h. Clonex is an EPA-registered pesticide and plant growth regulator (EPA Registration No. 79664-1) that is prohibited for use on cannabis;
 - i. According to the product label, Clonex is used to ensure root production of cuttings on plants. The label directs users to dip plant cuttings into Clonex to the desired depth;
 - j. Respondent purchased the pesticide on the following occasions of record: December 28, 2017; January 3, 2018; March 22, 2018; March 29, 2018; April 29, 2018; May 1, 2018; June 8, 2018; June 12, 2018; June 27, 2018; July 12, 2018; August 9, 2018; October 31, 2018; November 30, 2018; and December 26, 2018;



Stipulated Remedy

29. In lieu of proceeding with an administrative hearing and subsequent proceedings, Respondent further agrees to the stipulated remedies and terms set forth in Paragraphs 30–53, inclusive of all subparagraphs:
30. Respondent agrees to pay a monetary fine in the amount of two-hundred thousand dollars (\$200,000.00) made payable by check or money order, payable to the order of the Cannabis Control Commission Marijuana Regulation Fund. Payment shall consist of seven (7) installments due and payable pursuant to the following schedule:

Due Date	Amount
60 days from the date of Commission approval of this order	\$30,000
90 days	\$30,000
120 days	\$30,000
150 days	\$30,000
180 days	\$30,000
210 days	\$30,000
240 days	\$20,000

31. Payment shall be mailed to the following address:

Cannabis Control Commission
2 Washington Square
Worcester, MA 01604

32. Respondent submits that satisfaction of the corrective action measures identified in Paragraphs 33–38 on or before September 1, 2020 is a reasonable time for correcting the violations identified herein;
33. Respondent shall cease and desist the use of pesticides not labeled for use in cannabis cultivation;
34. Respondent shall submit to a two-year probationary period during which any and all test results reporting detection of pesticides at a level other than Non Detect, whether written or verbal, shall be reported by Respondent to the Commission within 24 hours;
35. Respondent shall maintain an accurate application record of every kind of chemical used in Respondent’s facility including, but not limited to, EPA-registered, 25b, and OMRI-listed products;
36. Respondent shall disclose all product information, including documentation of products purchased, relating to Respondent’s cultivation operations, including any and all growing media, immediately upon request;



37. Respondent shall ensure that all employees, including executive-level staff, participate in an ethics training on an annual basis during its two-year probationary period;
38. Respondent shall take all other action specified in its plan of correction submitted on or around January 14, 2019 and July 26, 2019 as necessary to achieve compliance with 935 CMR 500.000, *et seq.*;
39. This Order may be admissible as evidence in any future hearing before the Commission or used in connection with any future licensure or administrative actions by the Commission;
40. Any issues relating to the underlying complaint and investigation that formed the basis for this Order against Respondent (and any defenses that Respondent may have to such complaint or investigation) shall not be at issue in a proceeding against Respondent for failing to comply with the terms of this Order;
41. Respondent agrees that the Commission may consider the Order and the facts and circumstances described therein in connection with review of an application for licensure, renewal of licensure, or suitability review;
42. Respondent acknowledges advisement of hearing rights and process of the proceedings and wishes to resolve all issues which were the subject of the investigation or in any way related to the investigation by entering into this Order;
43. If approved by the Commission and upon execution of all parties, this Order shall have the same force and effect as an order entered after formal hearing pursuant to 935 CMR 500.500(12), except that it may not be appealed. Failure to comply with the terms of this Order, including but not limited to failure to make a timely payment, may constitute a basis for further administrative action against Respondent;
44. Respondent acknowledges that the Commission advised Respondent of its opportunity to consult with an attorney of their choosing and Respondent represents that they have had an opportunity to do so prior to signing the Agreement. Respondent acknowledges that they have been given a reasonable period of time in which to consider the terms of this Agreement before signing it. Respondent acknowledges and confirms that they have entered into this Agreement voluntarily and of their own free will, without duress or coercion, and that they are competent to enter into this Agreement. Respondent acknowledges that they have carefully read and fully understand the meaning and intent of this Agreement;
45. Respondent further understands and knowingly and voluntarily waives the following rights:
 - a. The right to hearing and Respondent's opportunity to request a hearing;
 - b. The right to cross-examine witnesses, subpoena witnesses, present evidence and testify on Respondent's own behalf;
 - c. The right to engage in pre-hearing discovery of the Commission's evidence; and



- d. The right to appeal this order.
46. Respondent consents to the terms and conditions described herein and agrees to waive its right to judicial review of this order pursuant to M.G.L. C. 30A, § 14;
 47. Upon execution by all parties, this Order shall represent the entire and final agreement of the parties. In the event that any provision of this Order is deemed unenforceable by a court of competent jurisdiction, such provision shall be severed, and the remainder of the Order shall be given full force and effect;
 48. This Order shall be binding upon Respondent and shall inure to the benefit of the parties to this Order and their respective successors and assignees and shall be construed in accordance with and governed by the laws of the Commonwealth of Massachusetts;
 49. Upon majority vote of the Commission, this Order shall become a permanent part of the Licensee's record and shall be open to public inspection and disclosure pursuant to the Commission's standard policies and procedures or applicable law;
 50. The Commission may reject the terms of this Order or otherwise deny ratification and entry of the Order. In such event, the terms of the Order shall be null and void including but not limited to Respondent's admissions and waiver of opportunity for hearing upon subsequent issuance of an Order to Show Cause issued upon the Commission's approval;
 51. This Order may be executed by e-mail and any signature delivered by either method shall be deemed to be as valid as an original signature;
 52. All costs and expenses incurred by Respondent to comply with this Order shall be the sole responsibility of Respondent and shall not in any way be the obligation of the Commission; and
 53. For purposes of addressing any future violations of the Order, the Cannabis Control Commission regulations, 935 CMR 500.000, *et seq*, 935 CMR 501.000, *et seq.*, 935 CMR 502.000, *et seq.*, shall include all later adopted regulations that are in effect at the time of the subsequent violation;

Failure to comply with the above conditions may result in administrative action against Respondent up to and including suspension and/or revocation of registration.

Commonwealth of Massachusetts Cannabis Control Commission

Shawn Collins, Executive Director

Date Signed



Ratified by Commission vote (____ yes, ____ no, ____ abstain) on [MONTH] ____, 2020.

Respondent Garden Remedies, Inc.

Karen Munkacy MD
Karen Munkacy MD (Jun 18, 2020 16:50 EDT)

As CEO of Garden Remedies, Inc.

Jun 18, 2020

Date Signed



June 2, 2020

The Botanist, Inc.

Case No. INV-2020-0000001001

License Nos. RMD No. 905, RMD No. 1225, RMD No. 1145

Final Order and Stipulated Agreement

This Final Order and Stipulated Agreement (hereinafter, “Order”) between the Commonwealth of Massachusetts Cannabis Control Commission (Commission) and The Botanist, Inc. (“Respondent”) is offered for the purposes of settlement and to avoid the uncertainty and cost of future administrative action.

The Commission finds that resolution of this matter serves the purposes of 935 CMR 501.450 and 935 CMR 501.360 because Respondent has asserted valid mitigating factors, cooperated in the Commission’s investigation, and taken corrective action to resolve compliance concerns identified herein, and abate any risk to public health, safety or welfare.

Accordingly, the Commission and Respondent submit to and agree as follows:

1. The Cannabis Control Commission has jurisdiction over licensed marijuana establishments and licensed medical marijuana treatment centers and the subject matter herein pursuant to the provisions of the Commonwealth’s marijuana laws, M.G.L. Chapters 94G and 94I, and the Commission’s regulations, 935 CMR 500.000, *et seq.*, 935 CMR 501.000, *et seq.*, and 935 CMR 502.000, *et seq.*
2. Respondent has been subject to an investigation conducted by the Commission’s investigators. The Commission alleges violations of the Commission’s regulations, 935 CMR 500.000, *et seq.* and 935 CMR 501.000, *et seq.*
3. Pursuant to 935 CMR 501.360, the Commission may impose a monetary fine after investigation and opportunity for a hearing at which the Respondent shall be afforded an opportunity to be heard and show cause as to why a fine or other financial penalty against the licensee should not be imposed for any acts or omissions determined to be in violation of the Commonwealth’s marijuana laws.
4. Respondent is wholly-owned by Acreage Holdings, Inc. (“Acreage”).
5. On February 11, 2019, Respondent submitted applications for provisional licensure as a Marijuana Retailer in Worcester, MA (MRN282160) and Shrewsbury, MA (MRN282186). It disclosed on those applications that its parent company, Acreage, had contractual arrangements with Patient Centric of Martha’s Vineyard (“PCMV”), HCI, and Mass Medi-Spa (collectively, the “Affiliates”), each of which holds one provisional MTC License. The disclosures on Respondent’s applications stated that Acreage’s



contractual arrangements with the Affiliates were for “consulting services and capital funds.” More specifically, the disclosures stated: “Acreage provides various levels of support [to the Affiliates] depending on the needs of the individual business, including capital investment, cultivation infrastructure, real estate services, and application support, subject to regulatory review. Acreage does not own or have direct or indirect control over the operations of these businesses nor any equity interests. The licensed entities may dismiss Acreage’s services at any time.”

6. The services agreements between Acreage and the Affiliates were first drafted nearly five years ago, when the Massachusetts Department of Public Health regulated the medical use of marijuana in the Commonwealth. At that time, the governing regulations provided that “No entity . . . may directly or indirectly control more than three RMDs.” 105 C.M.R. 125.100(a)(2) (repealed). The term “directly or indirectly control” was not expressly defined under the DPH’s regulations.
7. In July 2019, Respondent provided complete copies of all contractual agreements between Acreage and the Affiliates to the Commission Enforcement staff for its review.
8. On September 20, 2019, Acreage and its counsel attended an investigative conference during which Commission Enforcement staff inquired about the origin and nature of contractual arrangements between Acreage and the Affiliates. The staff’s inquiries focused on particular provisions in the agreements. The Staff did not make a determination of control during the investigative conference, but it stated that the Commission may deem one or more of the provisions as constituting control. Acreage agreed to amend or eliminate any of those provisions as needed to ensure they did not violate the regulations.
9. On September 24, 2019, Kevin Murphy, Acreage CEO and Respondent’s President, executed an affidavit attesting to Acreage and The Botanist’s commitment to “continue to conduct their business in full compliance with the Control Limitations, as they have and may be further amended from time-to-time.”
10. On November 1, 2019, the Commission amended its regulations to clarify the definition of direct or indirect control (among other things). Specifically, the revisions included a clarified definition of “Persons or Entities Having Direct Control.”
11. On January 3 and January 8, 2020, Commission staff issued a Request for Responses to formally clarify outstanding questions regarding the construction of contractual arrangements with respect to PCMV and Health Circle, respectively, including clarification of how termination of an affiliate’s Master Services Agreement would affect capital funding under the affiliate’s loan agreements.
12. On January 20, 2020, after Commission staff reviewed Respondent’s detailed response to the Request for Responses, Commission staff notified Respondent in writing that “the information and responses provided by [Respondent] may result in a finding that the agreements, as those agreements are currently constituted and in effect, establish that the

Company is in a position to control the decision-making of Patient Centric of Martha's Vineyard, Ltd. and/or Health Circle, Inc.”

13. Further, in its notice dated January 20, 2020, Commission staff requested that Respondent specify whether it wished to reopen its applications and make changes or request that the Commission consider the application as submitted.
14. On January 23, 2020, Respondent requested that its applications for provisional licensure be considered by the Commission as submitted, but “with the understanding that any outstanding questions related to Acreage’s ownership and control interests will be resolved prior to final licensure.” The Applicant’s response further emphasized its intent to reform any aspects of contractual agreements deemed by the Commission or Commission staff to constitute controlling interests.
15. On February 5, 2020, Commission staff submitted an investigation status memorandum finding “that the agreements, as currently written, contain provisions that the Commission may reasonably find to constitute control.”
16. The investigation status memorandum identified provisions in PCMV’s contractual agreements which required PCMV to obtain Acreage’s approval prior to adding or removing members to PCMV’s board of directors, changing CEOs, acquiring any equity interest, entering any similar management agreements with other entities, or changing its name or principal place of business. The memorandum further identified provisions which required Acreage’s approval of PCMV’s annual operating budgets and prohibited PCMV from making personnel hiring and compensation decisions other than those referred to in the approved budget. The memorandum identified provisions in both PCMV and HCI’s contractual agreements establishing significant revenue-sharing arrangements in connection with the master services agreements. These revenue-sharing provisions were established as a condition of maintaining capital-loan financing arrangements under respective loan agreements with PCMV and HCI. The memorandum addressed statutory license cap issues with respect to Respondent’s ME licenses but did not address statutory license cap with respect to MTC licenses.
17. In addition to the staff’s investigation status memorandum, Commission staff provided a standard executive summary for the Botanist’s provisional license recommendation consistent with the Respondent’s request for the Commission to consider the application as submitted. The recommendation section of the executive summary stated that “[t]he 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 staff recommendation did not make an opinion or determination of control or whether license cap limits were exceeded by Respondent or its affiliates.
18. On February 6, 2020, the Commission voted to table Respondent’s retail applications and requested a determination from staff with respect to the issue of control and whether license cap limits were exceeded by Acreage or its affiliates. In voting to table the applications, according to public meeting minutes, Commissioners expressed concern

about “the representation of a controlling relationship in an application as a non-controlling relationship” and that “whereas control and ownership are a suitability issue, the Commission needs to determine whether there is a violation of the cap with respect to medical before the Commission can move on the retail applications, because if there is a cap violation, there would be an effect on the retail applications.”

19. Following the February 6, 2020 public meeting, Acreage met with Commission staff and expressed its intention to take any further necessary steps to address the Commission’s concerns and clear away any obstacles to a vote on its applications. On February 13 and 14, 2020, Acreage terminated its Master Services Agreements with PCMV and HCI. Acreage had previously terminated its Master Services Agreement with Mass Medi-Spa on September 24, 2019.
20. On April 9, 2020, the Commission again voted to table Respondent’s retail applications.
21. The Commission, through its Executive Director, and Respondent have come to mutual agreement and understanding and jointly proposed to the Commission a resolution of alleged violations in lieu of proceeding through an administrative hearing to determine the merits of such allegations. The terms and conditions of this Order and Stipulated Agreement are expressly subject to the ratification of the Commission by majority vote of its Commissioners.

Applicable Law

22. No Person or Entity Having Direct or Indirect Control shall be granted, or hold, more than three licenses in a particular class, except as otherwise specified in 935 CMR 500.000. See 935 CMR 500.050(1)(b)(1) and 501.050(1)(b)(1).
23. Persons or Entities Having Direct Control means any person or entity having direct control over the operations of a Marijuana Establishment, which satisfies one or more of the following criteria: (a) An Owner that possesses a financial interest in the form of equity of 10% or greater in a Marijuana Establishment; (b) A Person or Entity that possesses a voting interest of 10% or greater in a Marijuana Establishment or a right to veto significant events; (c) A Close Associate; (d) A Person or Entity that has the right to control or authority, through contract or otherwise including, but not limited to: 1. to make decisions regarding operations and strategic planning, capital allocations, acquisitions and divestments; 2. to appoint more than 50% of the directors; 3. to appoint or remove Corporate-level officers or their equivalent; 4. to make major marketing, production, and financial decisions; 5. to execute significant or exclusive contracts; or 6. to earn 10% or more of the profits or collect more than 10% of the dividends. See 935 CMR 500.002 and 501.002.
24. The Commission shall receive notice of any such interests as part of the application pursuant to 935 CMR 500.101. See 935 CMR 500.050(1)(b)(5) and 501.050(1)(b)(5).

25. It is full and adequate grounds for suspending or revoking a Marijuana Establishment's License or denying a renewal application for a Marijuana Establishment License . . . that [t]he Licensee failed to comply with the control limitations listed in 935 CMR 500.050(1)(b) or would likely fail to comply with such limitations if a renewal License were granted. See 935 CMR 500.450(6) and 501.450(6).

Stipulated Findings

Respondent agrees, and in lieu of proceeding with an administrative hearing and subsequent proceedings, to the following stipulated findings and remedy:

26. On February 11, 2019, Respondent, through its parent company, stated on its retail applications that it “does not own or have direct or indirect control over the operations of [PCMV, HCI, and Mass Medi-Spa].” On or after November 1, 2019, when new regulations concerning the meaning of “direct or indirect control” went into effect, Respondent should have known that the contractual arrangements constituted a controlling interest requiring disclosure pursuant to 935 CMR 500.050(1)(b)(5).
27. On January 23, 2020, at the conclusion of the Commission’s investigation, Respondent requested that the Commission consider its application without changing its contractual disclosure dated February 11, 2019.
28. In view of the changes made by the November 1, 2019 regulations, the Commission could reasonably find that Respondent’s parent company should have known that it exercised direct or indirect control of five licensed MTC entities before it terminated the Affiliate agreements: one finally-licensed The Botanist entity, two provisionally-licensed The Botanist entities, and two provisionally-licensed affiliate entities.
29. Notwithstanding the foregoing, the Commission recognizes relevant mitigating factors to consider when weighing Respondent’s conduct, including the following:
- a. Respondent cooperated with the Commission’s investigation into ownership and control interests and engaged in good-faith efforts to comply with the regulations after being notified of possible control issues.
 - b. The Master Services Agreements were first drafted when the Massachusetts Department of Public Health regulated the medical use of marijuana in the Commonwealth and the concept of “direct or indirect control” was not further defined in the regulations.
 - c. Respondent conveyed its intention to reform contractual agreement provisions as a condition of provisional licensure after being informed by staff that the Commission may find that the agreements establish controlling interests.

- d. Respondent terminated and/or restructured its contractual agreements with PCMV and HCI after the Commission tabled Respondent's retail applications in February 2020.

Stipulated Remedy

30. Respondent agrees to the following as final resolution of any further administrative enforcement action arising from the Respondent's conduct:

- a. Respondent agrees to make a monetary payment in the amount of Two Hundred and Fifty Thousand dollars (\$250,000) made payable by certified check or money order to the Cannabis Control Commission Marijuana Regulation Fund, as established by M.G. L. c. 94G §14.
- b. Payment shall be postmarked on or before sixty (60) days from the ratification of this Order and mailed to the following address:

Cannabis Control Commission
2 Washington Square
Worcester, MA 01604

- 31. This Order may be admissible as evidence in any future hearing before the Commission or used in connection with any future licensure or administrative actions by the Commission.
- 32. Any issues relating to the underlying complaint and investigation that formed the basis for this Order against Respondent (and any defenses that Respondent may have to such complaint or investigation) shall not be at issue in a proceeding against Respondent for failing to comply with the terms of this Order.
- 33. Respondent agrees that the Commission may consider the Order, including the facts and mitigating circumstances described therein, in connection with review of an application for licensure, renewal of licensure, or suitability review.
- 34. Respondent acknowledges advisement of hearing rights and process of the proceedings and wishes to resolve all issues which were the subject of the investigation or in any way related to the investigation by entering into this Order.
- 35. If approved by the Commission and upon execution of all parties, this Order shall have the same force and effect as an order entered after formal hearing pursuant to 935 CMR 500.500(12) and 935 CMR 501.500(12), except that it may not be appealed. Failure to comply with the terms of this Order, including but not limited to failure to make a timely payment, may constitute the basis for further administrative action against Respondent.
- 36. Respondent acknowledges that the Commission advised Respondent of its opportunity to consult with an attorney of its choosing and Respondent represents that it has had an

opportunity to do so prior to signing the Agreement. Respondent acknowledges that it has been given a reasonable period of time in which to consider the terms of this Agreement before signing it. Respondent acknowledges and confirms that it has entered into this Agreement voluntarily and of its own free will, without duress or coercion, and that it is competent to enter into this Agreement. Respondent acknowledges that it has carefully read and fully understands the meaning and intent of this Agreement.

37. Respondent further understands and knowingly and voluntarily waives the following rights:
- a. The right to hearing and Respondent's opportunity to request a hearing;
 - b. The right to cross-examine witnesses, subpoena witnesses, present evidence and testify on Respondent's own behalf;
 - c. The right to engage in pre-hearing discovery of the Commission's evidence; and
 - d. The right to appeal this order.
38. Respondent consents to the terms and conditions described herein and agrees to waive its right to judicial review of this order pursuant to M.G.L. C. 30A, § 14.
39. Upon execution by all parties, this Order shall represent the entire and final agreement of the parties. In the event that any provision of this Order is deemed unenforceable by a court of competent jurisdiction, such provision shall be severed, and the remainder of the Order shall be given full force and effect.
40. This Order shall be binding upon Respondent and shall inure to the benefit of the parties to this Order and their respective successors and assignees and shall be construed in accordance with and governed by the laws of the Commonwealth of Massachusetts.
41. Upon majority vote of the Commission, this Order shall become a permanent part of Licensee's record and shall be open to public inspection and disclosure pursuant to the Commission's standard policies and procedures or applicable law.
42. The Commission may reject the terms of this Order or otherwise deny ratification and entry of the Order. In such event, the terms of the Order shall be null and void including but not limited to Respondent's admissions and waiver of opportunity for hearing upon subsequent issuance of an Order to Show Cause issued upon the Commission's approval.
43. The effectiveness of this Order shall be subject to the Commission's finding, in connection with consideration of The Botanist's pending retail applications (MRN282160, MRN282186), that all issues relating to control of MTC licenses and suitability of licensure have been satisfactorily resolved.
44. This Order may be executed by e-mail and any signature delivered by that method shall be deemed to be as valid as an original signature.

45. All costs and expenses incurred by Respondent to comply with this Order shall be the sole responsibility of Respondent and shall not in any way be the obligation of the Commission.

46. For purposes of addressing any future violations of the Order, the Cannabis Control Commission regulations, 935 CMR 500.000, *et seq.*, 935 CMR 501.000, *et seq.*, 935 CMR 502.000, *et seq.*, shall include all later adopted regulations that are in effect at the time of the subsequent violation.

Failure to comply with the above conditions may result in administrative action against Respondent up to and including suspension and/or revocation of registration.

Commonwealth of Massachusetts Cannabis Control Commission

Shawn Collins, Executive Director

Date Signed

Ratified by Commission vote (____ yes, ____ no, ____ abstain) on July ____, 2020.

Respondent The Botanist, Inc.



Kevin Murphy, Director
President & Secretary

June 10, 2020

Date Signed

June 16, 2020

Healthy Pharms, Inc.
License No. RMD-285

Case No. INV-2020-0000001002

FINAL ORDER AND STIPULATED AGREEMENT

This Final Order and Stipulated Agreement (hereinafter, “Order”) between the Commonwealth of Massachusetts Cannabis Control Commission (Commission) and Healthy Pharms, Inc. (the “Respondent”) is offered for the purposes of settlement and to avoid the uncertainty and cost of future administrative action.

The Commission finds that resolution of this matter serves the purposes of 935 CMR 501.450 and 935 CMR 501.500 because Respondent has accepted responsibility for the violations set forth in this Order, has cooperated in the Commission’s investigation, has taken initial corrective action to resolve the pesticide noncompliance indicated by test results associated with plants harvested and products manufactured in Respondent’s facility, and because Respondent agrees to take further corrective action to abate any further risk to public health, safety or welfare.

Accordingly, the Commission and Respondent submit to and agree as follows:

1. The Cannabis Control Commission has jurisdiction over licensed marijuana establishments and licensed medical marijuana treatment centers and the subject matter herein pursuant to the provisions of the Commonwealth’s marijuana laws, M.G.L. Chapters 94G and 94I, and the Commission’s regulations, 935 CMR 500.000, *et seq.*, 935 CMR 501.000, *et seq.*, and 935 CMR 502.000, *et seq.*;
2. Respondent has been subject to an investigation conducted by the Commission’s investigators. The Commission alleges violations of the Commission’s regulations, 935 CMR 501.000, *et seq.*;
3. Pursuant to 935 CMR 501.360, the Commission may issue an order to show cause as to why a fine or other financial penalty against Respondent should not be imposed upon determining that Respondent’s acts or omissions have violated the Commonwealth’s marijuana laws. 935 CMR 501.500 affords Respondent an opportunity to be heard and to show cause as to why a fine or other financial penalty should not be imposed;



4. Pursuant to 935 CMR 501.370, the Commission may also issue an order to show cause as to why the license or registration should not be suspended or revoked if, after an investigation, the Commission determines that such grounds exist. In accordance with 935 CMR 501.500, Respondent shall be afforded an opportunity to be heard and to show cause as to why the license or registration should not be suspended or revoked;
5. Respondent received a Provisional Certificate of Registration from the Department of Public Health (DPH) on June 27, 2014 and a Final Certificate of Registration on October 7, 2016;
6. DPH authorized Respondent to commence operations on March 8, 2017 under License No. RMD-285 (the “license”) at its facility located in Georgetown, Mass (the “facility”);
7. In or around November 2018, 4Front Holdings, LLC (aka Mission)—a former consultant to Respondent until 2015—purchased Respondent inclusive of the facility;
8. Respondent has also submitted applications for adult-use cultivation (MC281631), product manufacturing (MP281450), and retail (MR281754) licensure and seeks to commence adult-use operations at the facility;
9. The Commission last approved renewal of License No. RMD-285 on May 7, 2020;
10. In April 2018, Respondent contracted Triumvirate Environmental, Inc. (“Triumvirate”) to perform decontamination services in the facility in response to administrative orders issued by DPH and the Massachusetts Department of Agricultural Resources (MDAR) on the basis of unlawful pesticide use;
 - a. Commission-licensed Independent Testing Laboratory MCR Labs, Inc. (“MCR”) tested samples of Respondent’s plants from February 1–9, 2018. On February 7, 2018, MCR notified Respondent that test results from two of its plant samples indicated positive detections of the pesticide bifenthrin;
 - b. After Respondent submitted duplicate samples to MCR for further testing, MCR advised Respondent that the duplicate samples were likely to fail testing for bifenthrin on February 12, 2018;
 - c. MCR issued its Analytical Test Reports dated February 16, 2018 finding that Respondent’s plant samples had tested positive for the pesticide bifenthrin;
 - d. Respondent reported the test results to DPH on February 16, 2018, identifying Flower Room 6 as the harvest site for both plant samples. On March 17, 2018, Respondent notified DPH that three additional plant samples from Flower Room 4 had also tested positive for bifenthrin;
 - e. When interviewed by DPH, Respondent’s lead cultivator at the time reported having applied an EPA-registered pesticide, Compare and Save Concentrate Indoor/Outdoor Insect Control (EPA Registration No. 70506-24-84009), to tables in Vegetation Room 1 on or around October 19, 2017 to control broad mites;
 - f. On February 23, 2018, DPH issued a Summary Cease and Desist and Quarantine Order prohibiting Respondent from selling or distributing any marijuana. On March



- 28, 2018, MDAR issued an Administrative Order charging Respondent with violation of M.G.L. c. 132B § 6A;
- g. During April 26–30, 2018, Triumvirate performed decontamination activities in Vegetation Room 1, Flower Room 4, and Flower Room 6 of the facility. Services involved decontamination of all accessible horizontal surfaces using an industrial cleaning solution, including tabletops, walls up to electrical outlets, and floors, by utilizing a triple wash, triple rinse, power-washing procedure;
 - h. On or around May 14, 2018, Environmental Micro Analysis, Inc. issued Analytical Reports regarding wipe samples taken from the facility on May 8, 2018, after decontamination, which showed Non-Detect (ND) Results with a Reporting Limit of 0.01 ug/wipe for the following locations: Flower Rooms 1-8 and Vegetation Rooms 1-2;
 - i. On May 15, 2018, Respondent presented Environmental Micro Analysis' test reports to DPH and represented that the facility was free from bifenthrin contamination;
 - j. On June 21, 2018, DPH formally closed its investigation and rescinded all Cease and Desist Orders in effect;
11. On July 15, 2019, MCR issued Analytical Test Reports detecting the pesticide bifenthrin at concentration levels of 28 and 29.9 parts per billion (ppb) in two plant samples of Respondent's trim flower and detecting bifenthrin Below Quantitation Limits (BQL) in four affiliated plant samples of Respondent's bulk flower;
12. On July 16, 2019, Respondent reported MCR's test results to the Commission;
13. On or around July 18, 2019, the Commission initiated an investigation in conjunction with pesticide investigators from the Massachusetts Department of Agricultural Resources (MDAR);
14. On August 2, 2019, the Commission issued a Notice of Deficiency on account of the bifenthrin detected in Respondent's plants;
15. On August 9, 2019, the Commission, through its Executive Director, issued a Summary Quarantine and Cease and Desist Order requiring Respondent to "quarantine and cease the sale, transfer, transportation, destruction, or distribution" of ten packages associated with the contaminated plant samples. The Order further required the licensee to "quarantine Flower Room 6 including all cultivation equipment (e.g., trays, folier sprayers) and physical property (e.g., HVAC equipment, walls, and floors).";
16. On August 15, 2019, Respondent submitted a plan of correction to the Commission. In its plan of correction, Respondent claimed that the bifenthrin detected on its plants and in the facility was residue from Respondent's prior application of the pesticide on or around October 19, 2017, and not the result of a recent pesticide application;
17. On September 10, 2019, an investigative conference was held between Commission Enforcement staff and Respondent;
18. On September 18, 2019, Respondent submitted a supplemental corrective action plan to the Commission;



19. On February 20, 2020, MDAR issued Administrative Order 20-PE-07 finding that Respondent had unlawfully used pesticides in violation of M.G.L. c. 132B § 6A and 333 CMR 13.02(6)(b). MDAR's Order required Respondent to destroy all marijuana derived from Vegetation Room 1, Flower Room 6, and/or the C02 extractor, to clean Vegetation Room 1 and Flower Room 6, to clean the HVAC system in Vegetation Room 1, and to run the HVAC system for twenty-four hours prior to MDAR's collection of confirmatory wipe samples;
20. On March 3, 2020, the Commission withdrew the Summary Quarantine and Cease and Desist Order to facilitate Respondent's compliance with the product-destruction mandates set forth in MDAR's Administrative Order;
21. On March 4, 2020, Commission and MDAR investigators witnessed Respondent's destruction of product;
22. On April 23, 2020, MDAR confirmed the completion of testing and non-detection of pesticides or fungicides in Vegetation Room 1 and Flower Room 6;
23. In May 2020, the Commission concluded its investigation;

Applicable Law

24. Application of Pesticides shall be performed in compliance with M.G.L. c. 132B and the regulations promulgated at 333 CMR 2.00 through 333 CMR 14.00. Any testing results indicating noncompliance shall be immediately reported to the Commission. *935 CMR 501.120(5)*;
25. The cultivation process shall use best practices to limit contamination including, but not limited to, mold, fungus, bacterial diseases, rot, pests, Pesticides not in compliance with 935 CMR 501.120, mildew, and any other contaminant identified as posing potential harm. *935 CMR 501.120(9)*;
26. Pesticides means a substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, and any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant. *935 CMR 501.002*;
27. The *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-Infused Products for Massachusetts Registered Medical Marijuana Dispensaries* (the "Testing Protocol") adopted by the Commission on December 23, 2018 identifies bifenthrin as a pesticide commonly used in cannabis cultivation and mandates testing for the insecticide. The Testing Protocol further states that a production batch of finished plant material may be dispensed to patients or used to make other medical marijuana products if no individual pesticide or plant growth regulator is detected above 10 ppb;
28. Information provided by an MTC that was deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly, or by omission



or ambiguity, in and of itself, constitutes full and adequate grounds for suspending or revoking an MTC's license. *935 CMR 501.450(2)*;

29. Every MTC shall have and follow a set of detailed written operating procedures. Operating procedures shall include procedures to ensure accurate recordkeeping, including inventory protocols for transfer and inventory and procedures for integrating a secondary electronic system with the Seed-to-sale SOR (system of record). *935 CMR 501.105(1)(g)*;
30. Seed-to-sale Electronic Tracking System means a system designated by the Commission as the system of record (Seed-to-sale SOR) or a secondary electronic tracking system used by a Marijuana Establishment or an MTC or an Independent Testing Laboratory. This system shall capture everything that happens to an individual Marijuana plant, from seed and cultivation, through growth, harvest and Manufacture of Marijuana Products and MIPs, including transportation, if any, to final sale of finished products. Seed-to-sale Electronic Tracking System shall utilize a unique plant identification and unique-batch identification. *935 CMR 501.002*;
31. Seed-to-sale Electronic Tracking inventory shall be maintained including, at minimum, an inventory of Marijuana plants; Marijuana plant-seeds and Clones in any phase of development such as Propagation, Vegetation, and Flowering; Marijuana ready for dispensing; and all Marijuana Products. *935 CMR 501.105(8)(b)*;
32. An MTC shall establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of Marijuana and Marijuana Infused Products in the process of cultivation, and finished, stored Marijuana. *935 CMR 501.105(8)(c)*;
33. The failure to enter inventory into the Seed-to-sale SOR may result in the suspension or revocation of an MTC license. *935 CMR 501.105(8)(f)*;

Stipulated Findings

34. The Commission, through its Executive Director, and Respondent have come to mutual agreement and understanding, and jointly propose to the Commission a resolution of alleged violations in lieu of proceeding through an administrative hearing to determine the merits of such allegations. The terms and conditions of this Order and Stipulated Agreement are expressly subject to ratification of the Commission by majority vote of its Commissioners;
35. In lieu of proceeding with an administrative hearing and subsequent proceedings, Respondent further agrees to the stipulated findings set forth in Paragraphs 36–39, inclusive of all subparagraphs;
36. Respondent accepts responsibility for the pesticides detected and/or found on its facility and admits to having performed noncompliant applications of pesticides in violation of *935 CMR 501.120(5)*:



- a. From July–August 2018, Respondent performed noncompliant applications of hydrogen peroxide as a pesticide on ten occasions of record;
- b. During December 2018–February 2019, Respondent performed noncompliant applications of baking soda as a pesticide on thirteen occasions of record;
- c. On May 14, 2019, Commission inspectors performed an Adult-Use Post-Provisional License Inspection of the facility. Respondent’s Senior Director of Business Development and its lead cultivator and Commission Inspectors Nicolas Millen and Colin Soper were present;
- d. During the inspection, the lead cultivator confirmed that he held a pesticide applicator license;
- e. During the inspection, Commission inspectors discovered Trinity Nutralab Food Grade Hydrogen Peroxide;
- f. Trinity Nutralab Food Grade Hydrogen Peroxide is not a registered pesticide and cannot be used as a pesticide commercially;
- g. During the inspection, Commission inspectors discovered a Material Safety Data Sheet for KleenGrow among Respondent’s records and a plastic barrel of KleenGrow in Respondent’s warehouse/storage area;
- h. KleenGrow is an EPA-registered pesticide (EPA Registration No. 81820-2). The product label prohibits use in greenhouses where food crops are grown;
- i. In July 2019, Commission investigators found Axiom Harpin Proteins and Life Cloning Gel in the facility;
- j. Axiom Harpin Proteins are an EPA-registered pesticide and plant growth regulator (EPA Registration No. 71771-3-89112);
- k. Life Cloning Gel is a rooting compound that is not EPA-registered but does contain Indole-3-butyric acid, an ingredient found in other rooting gels that are considered plant growth regulators. The product label states: “This product is not intended for use on food crop sites.”;
- l. From March 2019–February 2020, samples of plants harvested in Respondent’s facility tested positive for the pesticide bifenthrin at concentrations of BQL, 10.2, 10.4, 11, 16.4, 20.8, 28 and 29.9 ppb;
- m. Bifenthrin is a synthetic pyrethroid used as an insecticide;
- n. During November–December 2019, oil concentrate manufactured by Respondent at the facility tested positive for the pesticide bifenthrin at levels of 10.84, 11.91, 12.04, 16.5, 18.79, 22.77, 23.52, 23.64, 63.79, 141.81 and 404.01 ppb;
- o. Wipe samples taken by MDAR on July 18, 2019 and analyzed by the Massachusetts Pesticide Analysis Laboratory (MPAL) on August 13, 2019 detected the pesticides bifenthrin and Piperonyl butoxide (PBO) in Flower Room 6 and Vegetation Room 1, in addition to pyrethrin pesticides in Respondent’s pesticide sprayer. The samples showed bifenthrin in concentrations ranging from 0.019 to 1.51 ug/sq.ft.; PBO in concentrations of 0.019 and 0.02 ug/sq.ft.; and pyrethrins at a concentration of 0.472 ug/sq.ft.
- p. Wipe samples taken by MDAR on October 7 and 8, 2019, and analyzed by MPAL on October 21, 2019, detected the pesticides bifenthrin and PBO in Flower Room 6 and



Vegetation Room 1 and detected bifenthrin in Respondent's CO2 extractor. The samples from Vegetation Room 1 showed bifenthrin in concentrations ranging from 0.282 to 26.079 ug/sq.ft and PBO in concentrations ranging from 0.49 to 2.272 ug/sq.ft. The samples in Flower Room 6 shows bifenthrin in concentrations ranging from 0.020 to 0.729 ug/sq.ft. and did not show PBO. The sample from Respondent's CO2 extractor showed bifenthrin at a concentration of 1.71 ug/sq.ft.

- q. Wipe samples taken by MDAR on November 12, 2019 and analyzed by MPAL on November 21, 2019 detected the pesticides bifenthrin, PBO, dinotefuran, fipronil, paclobutrazol, and etofenprox in the air filter in Vegetation Room 1 at the following concentration levels:

CLE191112-1 Vegetation Room 1, Air filter	Bifenthrin	2182 ug/sq.ft
	PBO	359 ug/sq.ft
	Dinotefuran	1.34 ug/sq.ft
	Fipronil	12.6 ug/sq.ft
	Paclobutrazol	1.45 ug/sq.ft
	Etofenprox	16.3 ug/sq.ft

- r. Respondent's air filter had been replaced three weeks prior to MDAR's sample collection on November 12, 2019;
- s. The facility uses a Variable Refrigerant Flow HVAC system that recycles the same air in each room with no air taken in from the outside and no air ejected from the room;
37. Respondent failed to immediately report test results indicating pesticide noncompliance in violation of 935 CMR 501.120(5):
- On or around June 19, 2019, Respondent sent four samples of Mandarin Cookies bulk flower and two samples of Mandarin Cookies trim flower to MCR for testing;
 - In late June or early July 2019, Respondent received preliminary test results from MCR reporting that both samples of Mandarin Cookies trim flower had tested positive for the pesticide bifenthrin in concentrations above 10 ppb and that Respondent's four samples of Mandarin Cookies bulk flower had tested positive for bifenthrin BQL;
 - In response to the results, Respondent collected wipe samples of ISO swabs, condensate, Eco-1 pesticide, TetraCurb pesticide, and Procidic 2 and submitted the samples to MCR for further pesticide screening on or around July 3, 2019;
 - Respondent knew the Mandarin Cookies pesticide results in late June or early July, but refrained from reporting these test results to the Commission until after MCR issued written Analytical Test Results on July 15, 2019;
 - During this time, Respondent collected additional swab samples from throughout the facility and submitted the samples to MCR on July 9 and 10, 2019 to screen for bifenthrin;



- f. On July 19, 22, and 31, 2019, Respondent received Analytical Test Reports from MCR detecting bifenthrin at various concentration levels in Vegetation Room 1 and Flower Rooms 1–8 of the facility, in some facility hallways and floors, and on Respondent’s harvest carts. Of the 36 samples tested by MCR, 15 showed bifenthrin at either below detectable levels (BDL) or BQL. The remainder of the results detected bifenthrin at concentration levels ranging from 11.2 ppb to 5,467.1 ppb;
 - g. Despite receiving multiple test results detecting bifenthrin throughout the facility during July 19–31, Respondent did not report those results to the Commission until August 15, 2019 as part of its Plan for Correction;
38. Although Respondent did not intend to provide misleading or untruthful information to the Commission, Respondent did provide information that could reasonably be construed as false or misleading or as information that tends to deceive or create a misleading impression, grounds for suspending or revoking Respondent’s license under 935 CMR 501.450(2):
- a. Respondent collected numerous swab samples from throughout the facility and submitted the samples to MCR on July 3, 9, and 10, 2019 to further screen for the pesticide bifenthrin;
 - b. The sample intake form and transportation manifest associated with Respondent’s sample collection indicate that Respondent took a swab sample from its power washer on or around July 10, 2019 (the “power washer sample”) and assigned a sample identification number to it, Sample ID No. 070919-39;
 - c. The sample intake form and transportation manifest indicate that the power washer sample was removed from the collection of swab samples sent to MCR. Its removal was affirmed by the initials of Respondent’s lead cultivator;
 - d. On August 15, 2019, Respondent submitted a plan of correction to the Commission;
 - e. The plan listed the MCR test results associated with Respondent’s internal sample collection. Respondent reported an ND lab result, indicating non-detection of bifenthrin, for the power washer sample that had previously been removed;
 - f. On April 3, 2020, MCR confirmed that it did not issue an Analytical Test Report for Sample ID No. 070919-39, the power washer sample, as cited by Respondent;
 - g. In July 2019, Respondent’s lead cultivator told Commission investigators that no off-label pesticide applications had occurred since DPH issued pesticide guidance in fall 2018;
 - h. This statement differed from Respondent’s prior admission to having used hydrogen peroxide as a pesticide, made to Commission inspectors during Respondent’s Adult-use Post-Provisional License Inspection in May 2019;
 - i. DPH circulated a Marijuana Pesticide Policy to all Registered Marijuana Dispensaries on October 16, 2018. Contrary to its statement, Respondent’s pesticide spray log verifies that it continued to apply baking soda as a pesticide after issuance of DPH’s notice, during December 18, 2018–February 4, 2019.



39. Respondent failed to enter inventory into the Seed-to-sale SOR in violation of 935 CMR 501.105(1)(g) and 935 CMR 501.105(8), noncompliance constituting grounds for suspension or revocation of an MTC license pursuant to 935 CMR 501.105(8)(f):
- a. On November 8, 2019, Respondent entered approximately fifty samples of cannabis flower and/or trim of varying strains into Metrc, the Commission Seed-to-sale SOR, under the item strain “Alien Rift”, a different strain of cannabis. At the time, Respondent was not cultivating Alien Rift plants.

Stipulated Remedy

40. In lieu of proceeding with an administrative hearing and subsequent proceedings, Respondent further agrees to the stipulated remedies and terms set forth in Paragraphs 41–65, inclusive of all subparagraphs:
41. Respondent agrees to pay a monetary fine in the amount of three-hundred and fifty thousand dollars (\$350,000.00) made payable by check or money order, payable to the order of the Cannabis Control Commission Marijuana Regulation Fund;
42. Payment shall be postmarked on or before sixty (60) days from ratification of this Order and mailed to the following address:
- Cannabis Control Commission
2 Washington Square
Worcester, MA 01604
43. Respondent submits that satisfaction of the corrective action measures identified in Paragraphs 44–50 on or before September 11, 2020 is a reasonable time for correcting the violations identified herein;
44. Respondent shall cease and desist the use of pesticides not labeled for use in cannabis cultivation;
45. Respondent shall submit to wipe sampling and testing of Vegetation 2, Flower Rooms 1–5, and Flower Rooms 7–8 for pesticide noncompliance. The Commission shall arrange for the collection of samples to be analyzed at Respondent’s expense;
46. Respondent shall employ a Harvest Compliance Manager with professional credentials in environmental science, horticulture, engineering, or chemistry, who also possesses proficiency in the Seed-to-sale SOR;
47. Respondent shall submit to a two-year probationary period during which any and all test results reporting detection of bifenthrin at a level other than ND, whether written or verbal, shall be reported by Respondent to the Commission within 24 hours;
48. Respondent shall maintain an accurate application record of every kind of chemical used in Respondent’s facility, including EPA-registered, 25b, and OMRI-listed products;



49. Respondent shall establish and follow an Environmental Monitoring Standard Operating Procedure which, at minimum, mandates professional air-quality testing of the facility on a periodic basis;
50. Respondent shall take all other action specified in its plan of correction submitted on August 15, 2019 and its supplemental corrective action plan on September 18, 2019, as necessary to achieve compliance with 935 CMR 501.000, *et seq.*;
51. This Order may be admissible as evidence in any future hearing before the Commission or used in connection with any future licensure or administrative actions by the Commission;
52. Any issues relating to the underlying complaint and investigation that formed the basis for this Order against Respondent (and any defenses that Respondent may have to such complaint or investigation) shall not be at issue in a proceeding against Respondent for failing to comply with the terms of this Order;
53. Respondent agrees that the Commission may consider the Order, Respondent's acceptance of responsibility, and the facts and circumstances described therein, including Respondent's efforts to decontaminate its facility, destroy its product, and its commitment to additional corrective actions, in connection with review of an application for licensure, renewal of licensure, or suitability review. The Commission agrees that the Order by itself shall not be a reason to find the Respondent unsuitable or to deny its adult or medical-use license or to fail to renew its adult or medical-use license;
54. Respondent acknowledges advisement of hearing rights and process of the proceedings and wishes to resolve all issues which were the subject of the investigation;
55. If approved by the Commission and upon execution of all parties, this Order shall have the same force and effect as an order entered after formal hearing pursuant to 935 CMR 935 CMR 501.500(12), except that it may not be appealed. Failure to comply with the terms of this Order, including but not limited to failure to make a timely payment, may constitute the basis for further administrative action against Respondent;
56. Respondent acknowledges that the Commission advised Respondent of its opportunity to consult with an attorney of their choosing and Respondent represents that they have had an opportunity to do so prior to signing the Agreement. Respondent acknowledges that they have been given a reasonable period of time in which to consider the terms of this Agreement before signing it. Respondent acknowledges and confirms that they have entered into this Agreement voluntarily and of their own free will, without duress or coercion, and that they are competent to enter into this Agreement. Respondent acknowledges that they have carefully read and fully understand the meaning and intent of this Agreement;
57. Respondent further understands and knowingly and voluntarily waives the following rights:
 - a. The right to hearing and Respondent's opportunity to request a hearing;



- b. The right to cross-examine witnesses, subpoena witnesses, present evidence and testify on Respondent's own behalf;
 - c. The right to engage in pre-hearing discovery of the Commission's evidence; and
 - d. The right to appeal this order.
58. Respondent consents to the terms and conditions described herein and agrees to waive its right to judicial review of this order pursuant to M.G.L. C. 30A, § 14;
59. Upon execution by all parties, this Order shall represent the entire and final agreement of the parties. In the event that any provision of this Order is deemed unenforceable by a court of competent jurisdiction, such provision shall be severed, and the remainder of the Order shall be given full force and effect;
60. This Order shall be binding upon Respondent and shall inure to the benefit of the parties to this Order and their respective successors and assignees and shall be construed in accordance with and governed by the laws of the Commonwealth of Massachusetts;
61. Upon majority vote of the Commission, this Order shall become a permanent part of Licensee's record and shall be open to public inspection and disclosure pursuant to the Commission's standard policies and procedures or applicable law;
62. The Commission may reject the terms of this Order or otherwise deny ratification and entry of the Order. In such event, the terms of the Order shall be null and void including but not limited to Respondent's admissions and waiver of opportunity for hearing upon subsequent issuance of an Order to Show Cause issued upon the Commission's approval;
63. This Order may be executed by e-mail and any signature delivered by either method shall be deemed to be as valid as an original signature;
64. All costs and expenses incurred by Respondent to comply with this Order shall be the sole responsibility of Respondent and shall not in any way be the obligation of the Commission; and
65. For purposes of addressing any future violations of the Order, the Cannabis Control Commission regulations, 935 CMR 500.000, *et seq*, 935 CMR 501.000, *et seq.*, 935 CMR 502.000, *et seq.*, shall include all later adopted regulations that are in effect at the time of the subsequent violation;



Failure to comply with the above conditions may result in administrative action against Respondent up to and including suspension and/or revocation of registration.

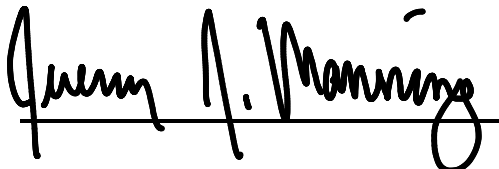
Commonwealth of Massachusetts Cannabis Control Commission

Shawn Collins, Executive Director

Date Signed

Ratified by Commission vote (____ yes, ____ no, ____ abstain) on [MONTH] ____, 2020.

Respondent Healthy Pharms, Inc.



Jeremy J. Manning

06/17/2020

Date Signed



GARDEN REMEDIES, INC.

ESTABLISHMENT OVERVIEW

1. Name, license number(s), and types of license(s) affected by the change in ownership and control request:

Garden Remedies, Inc.

MC281504 – Cultivation (Tier 3/Indoor)

MP281381 –Product Manufacturing

MR281495 – Retail

MR281942 – Retail

MR282471 – Retail

RMD1005 – MTC

RMD205 – MTC

RMD1265 – MTC

BACKGROUND OVERVIEW

2. The individual(s) requesting to acquire ownership or control interests over the license(s) include the following:

Brian Moran – Chief Financial Officer

Daniel Fireman – Board Member

John Pina – Board Member

Mark Karlan – Board Member

Steve Mikol – Board Member

3. The entity(ies) requesting to acquire ownership or control interests over the license(s) include the following:

GRI Holdco, LLC – Holding Company

4. Background checks were conducted on all individuals and entities disclosed within the application, as applicable. No suitability issues were discovered.

COO Executive Summary 1



5. The individuals and entity that are requesting ownership and control over the licenses do not appear to have exceeded any ownership and control limits over any particular license type or cultivation canopy.
6. Commission staff conducted an organizational and financial inspection into the individuals and entity associated with this change of ownership and control request. Commission staff found no issues or inconsistencies with the information provided to the Commission in the application.

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 the individual associated with this change in ownership and control may now effectuate any outstanding business agreements related to the change. The licensee will notify the Commission when the change in ownership and control has occurred.
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; and
5. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and 501.105(1) after effectuating the change in ownership and control, 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.



KRYPIES, INC.

ESTABLISHMENT OVERVIEW

1. Name, license number(s), and types of license(s) affected by the change in ownership and control request:

Krypies, Inc.
MR281594 - Retail

BACKGROUND OVERVIEW

2. The individual(s) requesting to acquire ownership or control interests over the license(s) include the following:

Michael Osterer - Owner
3. There were no entities disclosed in the application as acquiring ownership or control interests over the license.
4. Background checks were conducted on the individual disclosed within the application, as applicable. No suitability issues were discovered.
5. The individual that is requesting ownership and control over the license does not appear to have exceeded any ownership and control limits over any particular license type or cultivation canopy.

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 the individual associated with this change in ownership and control may now effectuate any outstanding business agreements related to the change. The licensee will notify the Commission when the change in ownership and control has occurred.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations;
3. The licensee remains suitable for licensure;

COO Executive Summary 1



4. The licensee shall cooperate with and provide information to Commission staff; and
5. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) after effectuating the change in ownership and control, 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.



PHARMACANNIS MASSACHUSETTS, INC.

ESTABLISHMENT OVERVIEW

1. Name, license number(s), and types of license(s) affected by the change in ownership and control request:

Pharmacannis Massachusetts, Inc.

MC282047 – Cultivation (Tier 7/Indoor)

MR282298 – Retail

MR281252 – Retail

RMD805 – MTC

Provisional Licensed MTC

BACKGROUND OVERVIEW

2. The individual(s) requesting to acquire ownership or control interests over the license(s) include the following:

Brett Novey – Chief Executive Officer

Daniel Roth – Chief Financial Officer

Mehul Patel – Chief Operating Officer

Gregory Cappelli – Board Member

John McCarthy – Board Member

James Barry – Board Member

3. There were no entities disclosed in the application as acquiring ownership or control interests over the licenses.
4. Background checks were conducted on all individuals disclosed within the application, as applicable. No suitability issues were discovered.
5. The individuals that are requesting ownership and control over the licenses do not appear to have exceeded any ownership and control limits over any particular license type or cultivation canopy.

COO Executive Summary 1



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 the individual associated with this change in ownership and control may now effectuate any outstanding business agreements related to the change. The licensee will notify the Commission when the change in ownership and control has occurred.
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; and
5. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and 501.105(1) after effectuating the change in ownership and control, 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.



LIBERTY MARKET, LLC

CHANGE OF LOCATION APPLICATION REVIEW

1. Name and current address of the licensee:

Liberty Market, LLC
126 South Main Street, Lanesborough, MA 01237

2. Type of license(s), and affected license number(s), that will be relocated if the change of location is approved:

MR281804 – Retail

3. The licensee has requested to relocate its operations to the following location:

35 North Main Street, Lanesborough, MA 01237

4. The licensee has paid the applicable fees for this change of location request.
5. The licensee submitted certification that they executed a Host Community Agreement with the new municipality.
6. The Commission received a municipal response from the municipality on June 4, 2020 stating the licensee was in compliance with all local ordinances or bylaws.

RECOMMENDATION

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

1. The licensee may not perform operations associated with its licenses at the new location, until upon inspection, demonstrating full compliance with the Commission's regulations;
2. The licensee shall submit an Architectural Plan Review request to the Commission for the building or remodeling of the facility at the new location, if applicable; and
3. The applicant shall cooperate with and provide information to Commission staff.

COL Executive Summary 1



NS AJO HOLDINGS, INC.

CHANGE OF LOCATION APPLICATION REVIEW

1. Name and current address of the licensee:

NS AJO Holdings, Inc.
20 Authority Drive
Fitchburg, MA 01420

2. Type of license(s), and affected license number(s), that will be relocated if the change of location is approved:

MTC Provisional License (Dispensing)

3. The licensee has requested to relocate its operations to the following location:

50 Clapp Street
Dorchester, MA 02125

4. The licensee has paid the applicable fees for this change of location request.
5. The licensee submitted certification that they executed a Host Community Agreement with the new municipality on July 27, 2019.
6. The Commission received a municipal response from the municipality on May 29, 2020 stating the licensee was in compliance with all local ordinances or bylaws.

RECOMMENDATION

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

1. The licensee may not perform activities associated with its license at the new location, until upon inspection, demonstrating full compliance with the Commission's regulations;
2. The licensee shall submit an Architectural Plan Review request to the Commission for the building or remodeling of the facility at the new location, if applicable; and

COL Executive Summary 1



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



MARIJUANA ESTABLISHMENT RENEWALS

EXECUTIVE SUMMARY

COMMISSION MEETING: JULY 9, 2020

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:

Marijuana Establishment Name	License Number	Renewal Application Number	Location	Funds
MISSION MA, INC.	MR282028	MRR205582	BROOKLINE	\$0.00
SIRA NATURALS, INC.	MC281252	MCR139882	MILFORD	\$250,000.00
SIRA NATURALS, INC.	MP281303	MPR243523	MILFORD	\$250,000.00
SIRA NATURALS, INC.	MX281310	MXR126656	MILFORD	\$250,000.00
MASS YIELD CULTIVATION LLC.	MC281392	MCR139879	PITTSFIELD	\$0.00
KRYPIES LLC	MR281594	MRR205586	PITTSFIELD	\$0.00
CAREGIVER-PATIENT CONNECTION LLC	MR282131	MRR205589	FITCHBURG	\$0.00
MASSGROW, LLC	MP281460	MPR243518	ATHOL	\$20,000.00
MASSGROW, LLC	MC281488	MCR139875	ATHOL	\$20,000.00
BUD'S GOODS & PROVISIONS, CORP.	MC281738	MCR139883	LAKEVILLE	\$0.00
BUD'S GOODS & PROVISIONS, CORP.	MP281507	MPR243526	LAKEVILLE	\$0.00

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.

ME Renewal Executive Summary 1



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.

The following licensees must comply with additional conditions:

1. Mission MA, Inc. (MR282028)
 - a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
 - b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
2. Sira Naturals, Inc. (MC281252/ MP281303/ MX281310)
 - a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
 - b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
3. Mass Yield Cultivation LLC (MC281392)
 - a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
 - b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
4. Krypies LLC (MR281594)
 - a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
 - b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.



5. Caregiver-Patient Connection LLC (MR282131)
 - a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
 - b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
6. MassGrow, LLC (MP281460/ MC281488)
 - a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
 - b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
7. Bud's Goods & Provisions, Corp. (MC281738/ MP281507)
 - a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
 - b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.



MEDICAL MARIJUANA TREATMENT CENTER RENEWALS

EXECUTIVE SUMMARY

COMMISSION MEETING: JULY 9, 2020

RENEWAL OVERVIEW

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

Medical Marijuana Treatment Center Name	License Number	Location (Cultivation & Processing)	Location (Dispensing)
BEWELL ORGANIC MEDICINE, INC.	RMD1245	LOWELL	MERRIMAC
GARDEN REMEDIES, INC.	RMD1005	FITCHBURG	MELROSE
BOUNTIFUL FARMS, INC.	RMD1485	LAKEVILLE	LAKEVILLE
HEKA, INC.	N/A	WESTFIELD	WEST SPRINGFIELD
HEKA, INC.	RMD1385	WESTFIELD	WESTFIELD
MAYFLOWER BOTANICALS, INC.	N/A	HOLLAND	HOLLAND
NORTHEAST ALTERNATIVES, INC.	RMD745	FALL RIVER	FALL RIVER
NS AJO HOLDINGS, INC.	N/A	FITCHBURG	FITCHBURG
NS AJO HOLDINGS, INC.	N/A	FITCHBURG	WATERTOWN
SIRA NATURALS, INC.	RMD625	MILFORD	NEEDHAM
SOLURGE, INC.	N/A	HOLYOKE	HOLYOKE
INSA, INC.	RMD845	EASTHAMPTON	SPRINGFIELD
REVOLUTIONARY CLINICS II, INC.	RMD1346	FITCHBURG	CAMBRIDGE
REVOLUTIONARY CLINICS II, INC.	RMD925	FITCHBURG	CAMBRIDGE
WELLNESS CONNECTION OF MA, INC.	N/A	REVERE	REVERE
AGRICULTURAL HEALING, INC.	N/A	FALL RIVER	FALL RIVER
COMMCAN, INC.	RMD565	MEDWAY	SOUTHBOROUGH
IPSWICH PHARMACEUTICAL ASSOCIATES, INC.	RMD1306	HINSDALE	ROWLEY

MTC Renewal Executive Summary 1



CANNATECH MEDICINALS, INC.	RMD1105	FALL RIVER	FALL RIVER
INSA, INC.	RMD365	EASTHAMPTON	EASTHAMPTON
SANCTUARY MEDICINALS, INC.	RMD1127	LITTLETON	DANVERS

2. All licensees have submitted renewal applications pursuant to 935 CMR 501.103(4).
3. All licensees have paid the appropriate annual license fee, where applicable.
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.

The following conditions apply to specific licensees:

1. Bewell Organic Medicine, Inc. (RMD1245)
 - a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.
2. Garden Remedies, Inc. (RMD1005)
 - a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.
3. Bountiful Farms, Inc. (RMD1485)
 - a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.
 - b. Pursuant to the February 6, 2020 Commission decision on final licensure, the licensee was required to complete all construction and buildout of its dispensary facility, obtain a certificate of occupancy for the dispensary facility, and complete all required inspections of the dispensary facility within 150 days. The Commission now modifies that condition herein, and requires that the licensee complete all construction and buildout of its dispensary facility, obtain a certificate of occupancy for the dispensary facility, and complete all required inspections of the dispensary facility within a



reasonable time, as determined by the Executive Director, following the removal of the State of Emergency declaration.

4. Heka, Inc. (RMD1385/MTC)
 - a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.
5. Mayflower Botanicals, Inc. (MTC)
 - a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.
6. Northeast Alternatives, Inc. (RMD745)
 - a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.
7. Ns Ajo Holdings, Inc. (MTC/MTC)
 - a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.
8. Sira Naturals, Inc. (RMD625)
 - a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.
9. Solurge, Inc. (MTC)
 - a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.
10. Insa, Inc. (RMD845/RMD365)
 - a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.

11. Revolutionary Clinics II, Inc. (RMD1346/RMD925)

MTC Renewal Executive Summary 3



- a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.

12. Wellness Connection of MA, Inc. (MTC)

- a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.

13. Agricultural Healing, Inc. (MTC)

- a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.

14. Commcan, Inc. (RMD565)

- a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.

15. Ipswich Pharmaceutical Associates, Inc. (RMD1306)

- a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.

16. Cannatech Medicinals, Inc. (RMD1105)

- a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.

17. Sanctuary Medicinals, Inc. (RMD1127)

- a. Within 60 days, the licensee shall submit their program to provide reduced cost or free marijuana to patients with documented verified financial hardship as required under 501.050(1)(h). The submission shall include a progress update on implementing the plan, if applicable, and the website where the plan is posted, if applicable.



CANNAVANNA, INC. F/K/A FIDELITY WELLNESS CENTER
MR282801

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Cannavanna, Inc. f/k/a Fidelity Wellness Center
256 Weymouth St., Rockland, MA 02370

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
MTC	Provisional License	Holyoke-Holyoke

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on January 16, 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): June 17, 2020.

Final License Executive Summary 1



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

Not applicable.

- d. Product Manufacturing Operation

Not applicable.

- e. 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.
- f. 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; and
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.



**FOUR DAUGHTERS COMPASSIONATE CARE
D/B/A ZEN LEAF PLYMOUTH
MR282232**

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Four Daughters Compassionate Care
d/b/a Zen Leaf Plymouth
11 Richard's Road, Plymouth, MA 02360

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
Retail	Provisional License	Sharon
Product Manufacturing	Provisional License	Sharon
Cultivation – Tier 4 / Indoor (20,001 – 30,000 sq. ft.)	Provisional License	Sharon
MTC	Provisional License	Sharon-Sharon

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on January 9, 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).

Final License Executive Summary 1



INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): June 16, 2020.
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

Not applicable.

- d. Product Manufacturing Operation

Not applicable.



e. 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.

f. 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; and
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.



FOUR DAUGHTERS COMPASSIONATE CARE
D/B/A ZEN LEAF PLYMOUTH
MR281552

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Four Daughters Compassionate Care
d/b/a Zen Leaf Plymouth
11 Richard's Road, Plymouth, MA 02360

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
Retail	Provisional License	Sharon
Product Manufacturing	Provisional License	Sharon
Cultivation – Tier 4 / Indoor (20,001 – 30,000 sq. ft.)	Provisional License	Sharon
MTC	Provisional License	Sharon-Sharon

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on November 7, 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).

Final License Executive Summary 1



INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): June 17, 2020.
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

Not applicable.

- d. Product Manufacturing Operation

Not applicable.



e. 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.

f. 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; and
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.



GARDEN REMEDIES, INC.

MR282471

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Garden Remedies, Inc.
732 Newburyport Turnpike, Melrose, MA 02176

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)	Commence Operations	Fitchburg
Product Manufacturing	Commence Operations	Fitchburg
Retail	Commence Operations	Newton
Retail	Commence Operations	Marlborough
MTC	Commence Operations	Melrose-Fitchburg
MTC	Commence Operations	Marlboro-Fitchburg
MTC	Commence Operations	Newton-Fitchburg

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on January 9, 2020.
5. The licensee has paid all applicable license fees.
6. New information has been reported to Commission staff regarding organizational changes of the entity since the issuance of the provisional license. These changes have been requested and are subject to Commission consideration and approval.

Final License Executive Summary 1



7. New information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license. This information is subject to Commission consideration and approval.

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): February 20, 2020.
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

Not applicable.



d. Product Manufacturing Operation

Not applicable.

e. 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.

f. Transportation

The licensee will be performing transportation activities from its Fitchburg location.

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; and
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.



PHARMACANNIS MASSACHUSETTS, INC.
D/B/A VERILIFE
MR282298

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Pharmacannis Massachusetts, Inc.
d/b/a Verilife
939 Boston Turnpike, Shrewsbury, MA 01545

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 7 / Indoor (50,001 – 60,000 sq. ft.)	Provisional License	Holliston
Retail	Commence Operations	Wareham
MTC	Commence Operations	Holliston-Wareham
MTC	Application Submitted	Franklin-Holliston

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on January 9, 2020.
5. The licensee has paid all applicable license fees.
6. New information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license. This request is subject to Commission review and approval.

Final License Executive Summary 1



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): June 15, 2020.
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

Not applicable.

- d. Product Manufacturing Operation



Not applicable.

e. 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.

f. 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; and
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.



PATIENT CENTRIC OF MARTHA’S VINEYARD, LTD

RMD1165

ESTABLISHMENT OVERVIEW

1. Name and address(es) of the Medical Marijuana Treatment Center:

Patient Centric of Martha’s Vineyard, LTD

Cultivation: 90 Dr. Fisher Rd, West Tisbury, MA 02575

Product Manufacturing: 90 Dr. Fisher Rd, West Tisbury, MA 02575

Dispensary: 510 State Rd, West Tisbury, MA 02575

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

Type	Status	Location
Cultivation, Tier 1/Indoor (up to 5,000 sq. ft.)	Application Submitted	West Tisbury
Product Manufacturing	Application Submitted	West Tisbury
Retail	Application Submitted	West Tisbury
Retail	Application Submitted	Framingham
Retail	Application Submitted	Tisbury

LICENSING OVERVIEW

3. The licensee was approved for provisional licensure on September 19, 2016.
4. The licensee has paid all applicable license fees.
5. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license.
6. No new information has been discovered by Commission staff regarding the suitability of the licensee(s) previously disclosed since the issuance of the provisional license.

INSPECTION OVERVIEW

MTC Final License Executive Summary 1



7. Commission staff inspected the licensee's Medical Marijuana Treatment Center on the following date(s): October 22, 2019 and June 2, 2020 (Cultivation and Product Manufacturing) and October 22, 2019 (Retail).
8. The licensee's Medical Marijuana Treatment Center was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 501.000, as applicable.
9. No evidence was discovered during the inspection(s) that indicated the Medical Marijuana Treatment Center was not in compliance with all applicable state and local bylaws or ordinances.
10. 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

MTC Final License Executive Summary 2



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. 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;
- iii. Availability and contents of patient education materials; and
- iv. Policies to ensure dispensing limits are followed.

f. 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.

Additionally, the licensee presented Commission staff with their alternative testing protocols pursuant to 935 CMR 501.200.

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 dispense, sell, or otherwise transport marijuana to other Medical Marijuana Treatment Centers, or to patients, 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 501.105(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;



6. The licensee may perform on-site laboratory testing operations for its marijuana and marijuana products in accordance with the proposed testing protocols provided to the Commission pursuant to 935 CMR 501.200;
7. The licensee shall maintain, and make available to the Commission, all laboratory testing results;
8. The licensee shall inform the Commission of any non-compliant laboratory testing results within 48 hours of detection;
9. The licensee shall inform the Commission of any defective or non-working equipment used in the establishment's on-site testing laboratory within 48 hours of detection; and
10. The licensee shall inform the Commission when any device or piece of equipment used at the establishment's on-site testing laboratory is sent out for calibration, repair, or maintenance within 48 hours.

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.



6 BRICKS, LLC
MRN283098

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

6 Bricks, LLC
250 Albany Street, Springfield, MA 01105

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.

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

Individual	Role
Payton Shubrick	Executive / Officer
Jack Wysocki	Executive / Officer
Fred Shubrick	Employee
Dawn Shubrick	Employee
Taylor Shubrick	Employee
Clinton Harris	Employee
John Delaney	Employee
Elena Jimenez	Owner / Partner

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 (Disadvantaged Business Enterprise)

7. The applicant and municipality executed a Host Community Agreement on September 24, 2019.
8. The applicant conducted a community outreach meeting on October 9, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on April 10, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Recruit 75% of individuals from Springfield, Commission-designated Economic Empowerment Priority applicants, Commission-designated Social Equity Program participants, Massachusetts residents who have past drug convictions, and Massachusetts residents with parents or spouses who have drug convictions.
2	Utilize 60% of qualified contractors, suppliers and vendors who have been negatively impacted from marijuana prohibition.
3	Provide a minimum financial donation in the amount of at least \$15,000 and provide 100 hours of community service time to support their efforts.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within five (5) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Provisional License Executive Summary 2



Monday – Sunday: 9:00 a.m. – 8:00 p.m.

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

#	Goal
1	Recruit 50% of women and 75% of minorities, veterans, persons with a disability or persons who are LGBTQ+.
2	Utilize 65% of suppliers and contractors that are owned by women, minorities, persons with a disability or persons who are LGBTQ+.

17. Summary of cultivation plan (if applicable):

Not applicable

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

Not applicable

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

6 Bricks, LLC 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



202 TRADING COMPANY, LLC

MRN281735

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

202 Trading Company, LLC
d/b/a Bud Barn
682 Spring Street, Winchendon, MA 01475

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.

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

Individual	Role
John Daly	Director
Mary Nichols	Executive / Director
Marla LaGrassa	Executive / Director
Ryan Nichols	Director
Robert Barela	Director
Walter LaGrassa	Close Associate

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

Entity	Role
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Provisional License Executive Summary 1



CRJ Group, Inc.	Entity with Direct or Indirect Authority
Mezzanine InvestCo Mass, LLC	Entity with Direct or Indirect Authority

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on November 25, 2019.
8. The applicant conducted a community outreach meeting on November 25, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 26, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Recruit 30% of its employees who are past or present residents of Fitchburg and Massachusetts residents who have past drug convictions or whose parents or spouses who have drug convictions.
2	Contract with 20% of suppliers, contractors and partner programs who are past or present residents of Fitchburg and Massachusetts residents who have past drug convictions or whose parents or spouses who have drug convictions.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within four (4) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Thursday: 10:00 a.m. – 8:00 p.m.

Friday – Saturday: 10:00 a.m. – 9:00 p.m.

Provisional License Executive Summary 2



Sunday: 11:00 p.m. – 6:00 p.m.

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

#	Goal
1	Recruit 50% women, 20-25% minorities, 5% veterans, 5% people with disabilities, 5-10% people who are LBGTQ+.
2	Contract with 20% of contractors, suppliers and wholesale partners who are owned by minorities, women, veterans, people who are LBGTQ+ and persons with disabilities.

17. Summary of cultivation plan (if applicable):

Not applicable

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

Not applicable

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

202 Trading Company, Inc. plans to 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 and local codes, ordinances, and bylaws;
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; and
5. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.

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.



ALEXSOFIA, LLC
MRN282926

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Alexsofia, LLC
d/b/a High Five
41 Strong Avenue, Northampton, MA 01060

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. However, the individual associated with this application is associated with two other applications under the business name "High Five, Inc."

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

Individual	Role
Christos Christodoulou	Owner/Partner

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

Provisional License Executive Summary 1



7. The applicant and municipality executed a Host Community Agreement on August 12, 2019.
8. The applicant conducted a community outreach meeting on July 9, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on April 7, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide quarterly training seminars to individuals who are past or present residents of an area of disproportionate impact, specifically Holyoke; Commission-designated Economic Empowerment Priority Applicants; Commission-designated Social Equity Program Participants, Massachusetts residents who have past drug convictions; and Massachusetts residents with parents or spouses who have drug convictions.
2	Provide post-seminar mentorship and counseling to those seeking employment in the licensed marijuana industry.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within four (4) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday: 10:00 a.m. – 9:00 p.m.
 Tuesday – Wednesday: 10:00 a.m. – 10:00 p.m.
 Thursday: 10:00 a.m. – 11:00 p.m.
 Friday: 10:00 a.m. – 11:30 p.m.
 Saturday: 11:00 a.m. – 11:30 p.m.
 Sunday: 12:00 p.m. – 11:00 p.m.



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

#	Goal
1	Give hiring preference to women and/or veterans (20%).

17. Summary of cultivation plan (if applicable):

Not Applicable.

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

Not Applicable.

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

Alexsofia, LLC 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 and local codes, ordinances, and bylaws;
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; and
5. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.

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.



BKPN, LLC
MRN282853

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

BKPN, LLC
1274 Merrimack Street, Dracut, MA 01826

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.

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

Individual	Role
William Kaltsas	Owner/Partner
Peter Niarhos	Owner/Partner

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 January 14, 2020.
8. The applicant conducted a community outreach meeting on December 18, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Dracut on April 7, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Recruit at least 20% of its staff from Lowell for its hiring initiatives.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within five (5) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Saturday: 9:00 a.m. – 11:00 p.m.
Sunday: 10:00am – 11:00pm
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit 5% women and 5% minorities for its hiring initiatives.
2	Contract with at least 10% of contractors, subcontractors, and suppliers who are Disadvantaged Business Entities.

17. Summary of cultivation plan (if applicable):

Provisional License Executive Summary 2



Not applicable

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

Not applicable

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

BKPN, LLC 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



BUDDA BROTHERS 90 SARGEANT STREET, LLC

MCN282254

MPN281870

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Buudda Brothers 90 Sargeant Street, LLC
90 Sargeant Street, Holyoke, MA 01040

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

Cultivation, Tier 3/Indoor (10,001 – 20,000 sq. ft.)
Product Manufacturing

The applications were 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. However, individuals in these applications are associated with licenses under Buudda Brothers, LLC.

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

Individual	Role
Justin Pagan	Owner / Partner
Joshua Pagan	Owner / Partner
John Toro	Owner / Partner
Jason Pagan	Employee

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.

Provisional License Executive Summary 1



6. Applicant's priority status:
Expedited Applicant (Disadvantaged Business Enterprise)
7. The applicant and municipality executed a Host Community Agreement on August 19, 2019.
8. The applicant conducted a community outreach meeting on June 17, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 26, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide at least one (1) internship per semester to a Cannabis Education Center student who lives in Holyoke and is 21 years of age or older.
2	Provide one scholarship (a donation up to \$4,000) for a CEC student who lives in Holyoke and is 21 years of age or older.
3	Volunteer at a minimum of four (4) OneHolyoke CDC events annually.
4	Donate and support the efforts of local organizations such as, but not limited to, OneHolyoke CDC, a non-profit organization whose focus is dedicated to improving housing for low-and moderate-income Holyoke residents.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

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

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



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

#	Goal
1	Maintain a workforce made up of, at least, 50% of women, minorities, veterans, disabled, and LGBTQ+.
2	Maintain a workforce made up of, at least, 25% women (or, those that identify as female).

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Brownies (Semi-sweet double chocolate chip)
2	Cookies (Chocolate Chip, Peanut Butter, Sugar Coated, and/or Oatmeal Raisin)
3	Hard-candy (Cherry, Orange, Lemon-lime, Strawberry, and Berry)
4	Brittle (Pecans, Almonds, and/or Peanuts)
5	Cereal Bars (Peanut butter, Chocolate Chip, Cinnamon Sugar, Marshmallow Cookie, and/or Dark Chocolate)
6	Hello Dolly Bars (Semi-sweet Chocolate, Butterscotch Chips, Coconut Chips, and Graham Cracker Crumbs.
7	Lotions and Balms (Vanilla, Rosemary, Mint, and/or Lavender)
8	Liquid Tinctures (Cherry, Orange, Lemon-lime, Strawberry, and Berry)
9	Kief
10	Bubble Hash
11	Pressed Hash
12	Rosin
13	Resin/Live Resin

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



Not applicable.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee; and
5. 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.

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.



CALYX PEAK OF MA, INC.

MCN281927

MPN281574

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Calyx Peak of MA, Inc.
10 Pullman Street, Worcester, MA, 01606

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

Cultivation - Tier 3/Indoor (10,001 – 20,000 sq. ft.)
Product Manufacturing

The application was reopened twice (2) 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 business roles in the Marijuana Establishment:

Individual	Role
Mark Niedermeyer	Executive / Officer
Hyong-Gue Michael Bang	Executive / Officer
Paul Song	Executive / Officer
Edward Schmults	Executive / Officer
Benjamin Cook	Executive / Officer
Erin Carachilo	Executive / Officer
Beom Lee	Owner / Partner
Howard Keum	Close Associate
Daniel Wittlinger	Close Associate
Joshua Del Rosso	Close Associate

Provisional License Executive Summary 1



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

Entity	Role
CPC - CPOG 2017 LLC	Majority owner of Calyx Peak of MA, Inc.
Calyx PG Holdings, LLC	Capital contributor to Calyx Peak of MA, Inc.

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on February 25, 2019.
8. The applicant conducted a community outreach meeting on May 17, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 27, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Annual financial contribution of at least \$5,000 to the CultivatED program to help promote participation in the cannabis industry by those who were disproportionately harmed by marijuana prohibition.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within six (6) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 24 hours per day.

Provisional License Executive Summary 2



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

#	Goal
1	Employ a workforce that consists of at least 50% individuals who identify as women, and hire people who identify as minorities, people with disabilities, and LGBTQ+ individuals.
2	Contract with at least 15% of businesses that identify themselves women, minorities, people with disabilities, and LGBTQ+ individuals.

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Chewable Gummies (root bear, peach mango jalapeno, tangerine passionfruit, cherry berry, raspberry rose, triple citrus)
2	Hard candy (mint)
3	Chocolates (milk chocolate and dark chocolate)
4	Baked goods (granola square)
5	Topical balms
6	Transdermal patches
7	Shatter
8	Wax
9	Budder
10	Crumble
11	Concentrates (oils, pre-filled vaporizing cartridges, rosin and hash)
12	Resin

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

Not applicable

RECOMMENDATION

Provisional License Executive Summary 3



Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee;
5. 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; and
6. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.

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.



CANNA PROVISIONS, INC.
MCN282476

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Canna Provisions Inc.
160 Quarry Hill Road, Lee, MA 01238

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

Cultivation, Tier 3/ Indoor (10,001 to 20,000 sq. ft.)

The application was reopened once (1) 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
Retail	Final License	Holyoke
Retail	Commence Operations	Lee

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

Individual	Role
Eugene McCain	Board Member
Megan Sanders	Executive / Officer
Erik Williams	Executive / Officer

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

Entity	Role
Better Provisions, LLC.	Owner

6. Applicant's priority status:

Provisional License Executive Summary 1



General Applicant

7. The applicant and municipality executed a Host Community Agreement on June 11, 2019.
8. The applicant conducted a community outreach meeting on May 14, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent a municipal notice to the City/Town of Lee on April 7, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	35% of the Canna Provisions workforce will be past or present residents of Holyoke and Pittsfield; Commission-designated Social Equity Program participants; Massachusetts residents who have past drug convictions; or Massachusetts residents with parents or spouses who have drug convictions.
2	Contribute at least \$30,000 in total to Nueva Esperanza, Inc., Girls, Inc. of the Valley, Cannabis Community Care and Research Network, and Goodwill Industries of the Berkshires, Inc.
3	Source 50% of suppliers, vendors and/or contractors from Holyoke and/or Pittsfield and 5% of product will come from or be sold to Marijuana Establishments who are EEP applicants.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within four (4) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 8:00 a.m. – 6:00 p.m.



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

#	Goal
1	Canna Provisions workforce will be comprised of 50% woman and 35% will be minorities, veterans, persons with disabilities and persons who are LBGTQ+.
2	Source 40% of services with suppliers and contractors that are owned by or who employ a majority of minorities, women, veterans, persons with disabilities and persons who are LBGTQ+.

17. Summary of cultivation plan (if applicable):

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

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

Not applicable

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

Not applicable

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



COASTAL CULTIVARS, LLC

MCN282052

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Coastal Cultivars, LLC
0 Patterson Brook Road, Wareham, MA 02576

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

Cultivation - Tier 11/Outdoor (90,001 to 100,000 sq. ft)

The application was reopened twice (2) 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
Product Manufacturing	Application Submitted	Wareham

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

Individual	Role
Ben Smith	Owner / Partner
Jose Breton	Owner / Partner
Jarrad Glennon	Owner / Partner

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

Entity	Role
Samoel Ventures, LLC	Entity with Direct/Indirect Authority
Greenfin LLC	Entity with Direct/Indirect Authority

6. Applicant's priority status:

Provisional License Executive Summary 1



Expedited Applicant (License Type)

7. The applicant and municipality executed a Host Community Agreement on March 21, 2019.
8. The applicant conducted a community outreach meeting on December 19, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on April 1, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Employ at least 25% of its employees from geographic areas of disproportionate impact, specifically Wareham, MA, or individuals who personally have, or have spouses that have, drug convictions.
2	Host bi-annual industry-specific educational programs to assist individuals who have been negatively impacted by cannabis prohibition.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within six (6) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 8:00 a.m. – 8:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
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Provisional License Executive Summary 2



1	Employ at least 25% of individuals that are female, minority, veteran, disabled, and/or individuals' part of the LGBTQ community.
2	Have a management team comprised of 25% of female, minority, veteran, disabled, and/or individuals' part of the LGBTQ community.
3	Provide charitable donations to the Disabled American Veterans of Massachusetts.

17. Summary of cultivation plan (if applicable):

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

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

Not applicable

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

Not applicable

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



COMM AVE CANNA, INC.
MRN282314

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Comm Ave Canna, Inc.
1030 Commonwealth Ave, 2nd Floor, Brookline, MA 02215

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 business roles in the Marijuana Establishment:

Individual	Role
John-Bryant Hauk	Executive / Officer
John Hauk	Executive / Officer
Garrett Hauck	Executive / Officer
Frances Helfrich-Hauck	Owner / Partner
Stephen DeFusco	Owner / Partner
Charles Haydon	Owner / Partner
Ryan Rouleau	Owner / Partner

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

Entity	Role
CAC Holdings, LLC	Capital Contributor

Provisional License Executive Summary 1



6. Applicant's priority status:

General Applicant
7. The applicant and municipality executed a Host Community Agreement on October 31, 2018.
8. The applicant conducted a community outreach meeting on September 17, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on June 15, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Donate \$5,000 annually to RISE Academy.
2	Offer one (1) paid internship opportunity per year to a graduate of RISE Academy.
3	Hire 10-15% of its total employees from communities disproportionately impacted by the war on drugs within Boston and Suffolk County.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within four (4) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 10:00 a.m. – 8:00 p.m.

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15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.



16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Employ 10-15% of individuals from diverse populations.
2	Employ at least 20% of individuals from diverse populations to hold management and executive positions.
3	Participate in no less than two (2) job fairs annually and educational seminar.

17. Summary of cultivation plan (if applicable):

Not applicable

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

Not applicable

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

Comm Ave Canna, Inc. plans to 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



COYOTE CANNABIS CORPORATION

MCN282498

MPN281798

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Coyote Cannabis Corporation
56 Industrial Dr., Unit B, Uxbridge, MA 01569

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.)
Product Manufacturing

The application was reopened one (1) 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. However, an individual associated with these applications is also associated with an application under "Holyoke 420, LLC"

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

Individual	Role
Blake Mensing	Owner / Partner
George Mensing	Owner / Partner
Margaret Kinsella	Director
Nicholas Hansen	Director

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.

Provisional License Executive Summary 1



6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on November 25, 2019.
8. The applicant conducted a community outreach meeting on December 10, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on June 10, 2020 for the applicant's product manufacturing application. The Commission sent a municipal notice to the City/Town of Uxbridge on April 15, 2020 for its cultivation application. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Donate \$5,000 to Cannabis Community Care and Research Network (\$2,500) and Massachusetts Recreational Consumer Council (\$2,500) to benefit its ability to develop skills for Economic Empowerment Priority Applicants and Social Equity Training Program Participants.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

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

Monday – Friday: 6:30 a.m. – 8:00 p.m.
Saturday – Sunday: 9:00 a.m. – 7:00 p.m.



15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.

16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit at least 20% of women, veterans, minorities, LGBTQ and/or people with disabilities for its hiring initiative.

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Ice Water Hashish
2	Solventless Hash Rosin
3	Solventless Hash Rosin Cartridges
4	Pre-Rolled Joints
5	Cannagars
6	Moonrocks
7	Sunrocks

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

Not applicable

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee; and
5. 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.



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.



DDM SALES, INC.

MRN281981

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

DDM Sales, Inc.
1 Lloyd Street, Blackstone, MA 01504

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.

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

Individual	Role
Vishnubhai Patel	Executive / Officer

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 (Disadvantaged Business Enterprise)

Provisional License Executive Summary 1



7. The applicant and municipality executed a Host Community Agreement on March 6, 2019.
8. The applicant conducted a community outreach meeting on February 7, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on June 2, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Conduct at least two (2) annual waterway or city clean-up events in Worcester and Braintree.
2	Provide a minimum donation of \$5,000 and 75 hours of service annually to the South Worcester Neighborhood Improvement Corp.

SUITABILITY 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 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:

Monday – Saturday: 9:00 a.m. – 10:00 p.m.
Sunday: 10:00 a.m. – 9:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit 50% of women and 10% of veterans.
2	Mentor a minimum of two (2) interns, chosen from a pool of applicants that are women and/or veterans, per year.

Provisional License Executive Summary 2



17. Summary of cultivation plan (if applicable):

Not applicable

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

Not applicable

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

DDM Sales, Inc. 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



DEEP ROOTS, INC.
MBN281496

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Deep Roots Inc
420 West Street, Uxbridge, MA 01569

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

Microbusiness (Cultivation and Product Manufacturing Operations)

The application was reopened twice (2) 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 business roles in the Marijuana Establishment:

Individual	Role
Michael Brais	Owner / Partner
Bianca Brais	Owner / Partner
George Brais	Director
Raffaele Selitto	Director
Deborah Selitto	Director
Marian Blander	Director
Steven Blander	Board Member
Elizabeth Brais	Board Member
Timothy Nikopolous	Close Associate

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

Provisional License Executive Summary 1



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

6. Applicant's priority status:

Expedited Applicant (Disadvantaged Business Enterprise and License Type)

7. The applicant and municipality executed a Host Community Agreement on January 7, 2019.
8. The applicant conducted a community outreach meeting on January 23, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 12, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Donate a total of \$10,000 annually to Cannabis Community Care and Research Network.

SUITABILITY 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 are no concerns arising from background checks on the individuals or entities associated with the application.

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within six (6) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:
- Monday – Sunday: 24 hours
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:



#	Goal
1	Achieve at least 10% of its staffing needs from people from diverse backgrounds, which shall be defined to include minorities, women, veterans, people with disabilities, and LGBTQ+.
2	Employ a minimum of 10% of its contractors, subcontractors, and suppliers who are listed in the Commonwealth of Massachusetts Certified Businesses as being a Minority Business Enterprise, a Women Business Enterprise, a Veteran Business Enterprise, a Lesbian Gay Bisexual Transgender Enterprise, a Service-Disabled Veteran Owned Business Enterprise, or a Disability-Owned Business Enterprise, with particular consideration given to businesses classified as Disadvantaged Business Enterprises.

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Flower
2	Concentrates
3	Tinctures
4	Lotions
5	Gummy Candy (Grape, Lime, Orange, Cherry, Green Apple, Blue Raspberry, Lemon and Watermelon, Lemonade, Fruit Punch, Lime, Lemon Lime, Strawberry, Raspberry and Pineapple)
6	Hard Candy (Grape, Lime, Orange, Cherry, Green Apple, Blue Raspberry, Lemon, Lemonade, Fruit Punch, Lime, Lemon Lime, Strawberry, Raspberry, Pineapple, Watermelon, Butterscotch, Carmel, Mint, Spearmint, Peppermint, Coffee and Cinnamon.)
7	Chocolates (Milk Chocolate, Mint Chocolate, Dark Chocolate, White Chocolate, Raspberry Chocolate, Chocolate Caramel, Orange Chocolate, Nougat Chocolates, Cookies and Cream, Chocolate Coffee, Caramel Toffee, Caramel Cream Toffee)
8	Honey Sticks
9	Cookies (Chocolate Chip, Sugar, Snickerdoodle, Oatmeal, Oatmeal Raisin, Oatmeal Chocolate Chip and Mint Chocolate)
10	Brownies/Cake (Traditional Brownie, Chocolate Chip Cookie Brownies, Mint Chocolate Brownie, Cream Filled, Caramel Brownies, Blondie (vanilla) and Blondie (Vanilla) Cream Filled)

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

Provisional License Executive Summary 3



Not applicable.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee;
5. 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; and
6. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.

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.



DEERFIELD NATURALS, INC.

MCN281426

MPN281541

MRN281929

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Deerfield Naturals Inc
10 Greenfield Road South, Deerfield, MA 01373

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

Cultivation - Tier 3/Indoor (10,001 to 20,000 sq. ft)
Product Manufacturing
Retail

The application was reopened once (1) 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 business roles in the Marijuana Establishment:

Individual	Role
Mark Valone	Owner / Partner
Matthew Plotkin	Manager

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:

Provisional License Executive Summary 1



General Applicant

7. The applicant and municipality executed a Host Community Agreement on June 27, 2019.
8. The applicant conducted a community outreach meeting on June 6, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent a municipal notice to the City/Town of Deerfield on March 27, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Ensure that at least 10% of vendors are businesses located in Greenfield, Holyoke, and Amherst.
2	Recruit at least 5% of Deerfield Naturals' employees will be past or present residents of Greenfield, Holyoke, and Amherst.

SUITABILITY 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 REVIEW

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

Monday – Sunday: 10:00 a.m. – 10:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Hire and retain at least 50% of employees who are women.
2	Hire and retain at least 5% of employees who are minorities.

Provisional License Executive Summary 2



3	Utilize at least 5% of vendors that are certified disadvantaged business enterprises for services.
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17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Chocolate Brownie
2	Salted Caramels
3	Chewable Tablet (Peppermints / Ginger mints)
4	Truffle/Confection (Dark chocolate, Raspberry, Coconut, Salted Caramel, and Ginger)
5	Chocolate Bar (Dark, Milk, Raspberry, Cacao Nib)
6	Chocolate-Covered Espresso Bean (Buzz beans)
7	Coconut Oil Capsule
8	Cookie (Chocolate chip, Sugar, Oatmeal raisin and Lemon)
9	Energy Shot (Raspberry, Lemon-lime, Strawberry-lemonade, Hibiscus and Maple lemon)
10	Fruit Chew (Spruce, Raspberry-lime, Lemon-ginger, Mango and Strawberry)
11	Hibiscus Tea (Hibiscus cooler)
12	Honey Straw Stick (Honey and Maple syrup)
13	Kombucha Tea (Pineapple, Grape and Ginger)
14	Lemonade
15	Lozenges (Spruce, Honey-lemon, Raspberry, Birch, Cherry and Grape)
16	Macaroon (Coconut)
17	MCT Oil Tincture
18	Nano-Emulsified Tincture (Throat spray and drops)
19	Oil Tincture (Olive oil and Coconut oil)
20	Peanut Butter Cups
21	Frozen Confection (Raspberry-lime and Pineapple-ginger)
22	Tea (Lemon-ginger)
23	Tincture-Infused Lotion (Coconut and CDB)



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

Deerfield Naturals, Inc. plans to obtain marijuana or marijuana products from its affiliated licenses. If the need arises, Deerfield Naturals, Inc. 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 and local codes, ordinances, and bylaws;
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; and
5. 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.

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.



ESKAR ARLINGTON, LLC

MRN282638

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Eskar Arlington LLC
21 Broadway Street, Arlington, MA, 02474

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 once (1) 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. However, the individuals and entities associated with this application are associated with another retail application under the name “Eskar Northbridge, LLC”.

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

Individual	Role
Michael Hunnewell	Owner / Partner
Michael Aldi	Owner / Partner
Brian Navarro	Close Associate
John Aldi	Close Associate

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

Entity	Role
Eskar Holdings LLC	Entity with Direct or Indirect Authority

Provisional License Executive Summary 1



6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on June 24, 2019.
8. The applicant conducted a community outreach meeting on September 4, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent a municipal notice to the City/Town of Arlington on April 15, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Make a minimum annual financial contribution of at least \$5,000 to the CultivatED program.
2	Donate 8 hours per employee per year to its neighborhood cleanup and a goal of having 85% participation in the neighborhood clean-up program by its employees each calendar year.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within four (4) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:
- Monday – Saturday: 9:00 a.m. – 9:00 p.m.
Sunday: 10:00 a.m. – 7:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.



16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Hire a workforce that is made up of at least 50% of individuals who identify as women.
2	Hire people who identify as minorities (10%), veterans (10%), people with disabilities (5%) and LGBTQ+ individuals (5%).

17. Summary of cultivation plan (if applicable):

Not applicable

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

Not applicable

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

Eskar Arlington, LLC 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



ESKAR NORTHBRIDGE, LLC

MRN283073

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Eskar Northbridge, LLC
Plot 28, Parcel 73 a/k/a Building 4, Commerce Drive, Northbridge, MA, 01534

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 once (1) 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. However, the individuals and entities associated with this application are also associated with a retail application under the name “Eskar Arlington, LLC”.

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

Individual	Role
Michael Hunnewell	Owner / Partner
Michael Aldi	Owner / Partner
Brian Navarro	Close Associate
John Aldi	Close Associate

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

Entity	Role
Eskar Holdings, LLC	Entity with Direct or Indirect Authority



6. Applicant's priority status:
General Applicant
7. The applicant and municipality executed a Host Community Agreement on April 8, 2019.
8. The applicant conducted a community outreach meeting on October 3, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 26, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Make an annual contribution of at least \$5,000 to the CultivatED program.
2	Donate 8 hours per employee per year to its neighborhood cleanup and a goal of having 85% participation in the neighborhood clean-up program by its employees each calendar year.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within four (4) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Saturday: 8:00 a.m. – 10:00 p.m.
Sunday: 10:00 a.m. – 10:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

Provisional License Executive Summary 2



#	Goal
1	Hire a workforce that is made up of at least 50% of individuals who identify as women and will also seek opportunities to hire people who identify as minorities (10%), veterans (10%), people with disabilities (5%) and LGBTQ+ individuals (5%).
2	Achieve at least 85% of employee satisfaction related to work environment safety, acceptance, and respect.

17. Summary of cultivation plan (if applicable):

Not applicable

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

Not applicable

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

Eskar Northbridge, LLC 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



FOUR SCORE HOLDINGS, LLC

MCN282187

MPN281689

MRN282757

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Four Score Holdings, LLC
144 Sturbridge Road, Charlton, MA 01507

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

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

The applications were reopened once (1) for additional information.

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

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

Individual	Role
Kurt Smith	Owner / Board Member
Matthew McGeorge	Owner / Partner
Tim St. Germain	Owner / Partner
Michael Curtis	Owner / Board Member
Daniel Glissman	Owner / Board Member
Eamonn O’Kane	Owner / Board Member
Niall McManus	Owner / Board Member

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

Provisional License Executive Summary 1



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

5. Applicant's priority status:

General Applicant

6. The applicant and municipality executed a Host Community Agreement on March 12, 2019.
7. The applicant conducted a community outreach meeting on June 3, 2019 and provided documentation demonstrating compliance with Commission regulations.
8. The Commission received a municipal response from the municipality on June 10, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
9. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Hire at least 25% of its employees from "Target Areas" (Southbridge, Spencer and the specified census tracts in Worcester), and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions.
2	Contribute a minimum of forty (40) hours of volunteer time to charitable groups serving the Target Areas.
3	Contribute a minimum of \$10,000 to charitable groups serving the Target Areas and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions.
4	Provide educational programs and informational sessions geared towards individuals from the Target Areas and/or Massachusetts Residents who have, or have parents or spouses who have, past drug convictions that are interested in the cannabis industry, at least twice a year.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

Provisional License Executive Summary 2



12. The applicant states that it can be operational within four (4) months of receiving the provisional license(s).
13. The applicant's proposed hours of operation are the following:

Monday – Sunday: 8:00 a.m. – 8:00 p.m.
14. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
15. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Provide job opportunities to minorities, women, veterans, people with disabilities, and L.G.B.T.Q. + by posting monthly notices for three (3) months during the hiring process in newspapers of general circulation.
2	Offer 100% of the Company's opportunities for advancement to management and executive positions internally.
3	Require employee education on diversity, implicit biases, and sensitivity within the first ninety (90) days of employment and once annually thereafter.

16. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Edibles (dark and milk chocolate bars and the following flavored cube gummies and lozenges: pomegranate, watermelon, raspberry, blueberry, mango and tangerine)
2	Lotions
3	Salves
4	Oils
5	Sprays
6	Waxes
7	Shatter
8	Vape Oil
9	Tinctures
10	Keif
11	Pre-rolled Cannabis Joints

Provisional License Executive Summary 3



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

Four Score Holdings, LLC plans to obtain marijuana from its affiliated licenses.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



GREEN LEAF HEALTH, INC.
MRN282991

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Green Leaf Health, Inc.
91 George Leven Drive, North Attleborough, MA 02760

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 twice (2) 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 business roles in the Marijuana Establishment:

Individual	Role
Brian Conefrey	Executive / Officer
Kristina Conefrey	Executive / Officer
Allison Conefrey	Executive / Officer

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 (Disadvantaged Business Enterprise)

Provisional License Executive Summary 1



7. The applicant and municipality executed a Host Community Agreement on October 24, 2019.
8. The applicant conducted a community outreach meeting on April 24, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 19, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	To host two (2) training seminars annually
2	Give hiring preference to individuals who are past or present residents of an area of disproportionate impact, specifically Taunton, Fall River and New Bedford; Massachusetts residents who have past drug convictions; and Massachusetts residents with parents or spouses who have drug convictions.
3	Green Leaf Health, Inc. will ensure its workforce is comprised of at least 25% Commission-designated Economic Empowerment Priority Applicants and Commission-designated Social Equity Program Participants.
4	Partner with community groups and provide support to disproportionately harmed groups; providing financial assistance to persons identified by MassHire Attleboro Career Center and its partners, including Bristol County Consortium, providing job training and skills.
5	Source 25% of its contracts to purchase marijuana and marijuana products from Commission-designated Economic Empowerment Priority Applicants, Commission-designated Social Equity Program Participants and companies that employ more than 51% of its employees from areas of disproportionate impact.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within 14 months of receiving the provisional license(s).



14. The applicant's proposed hours of operation are the following:

Monday – Saturday: 9:00 a.m. – 9:00 p.m.

Sunday: 10:00 a.m. – 6:00 p.m.

15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.

16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Give hiring preference to individuals that identify as minorities, women, veterans, people with disabilities and people identifying as LGBTQ+ (25%).
2	Green Leaf Health, Inc. will obtain at least 25% of its supplies and services from vendors and/or suppliers that are minorities, women, veterans, people with disabilities and people identifying as LGBTQ+.

17. Summary of cultivation plan (if applicable):

Not Applicable.

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

Not Applicable.

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

Green Leaf Health, Inc. 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



GREEN MEADOWS FARM, LLC

MCN282409

MPN281763

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Green Meadows Farm, LLC
64 Mill Street, 1st Floor, Southbridge, MA 01550

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

Cultivation - Tier 3/Indoor (10,001 – 20,000 sq. ft.)
Product Manufacturing

The application was reopened once (1) 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
Retail	Provisional License	Southbridge
MTC	Provisional License	Southbridge - Southbridge
MTC	Application Submitted	Not Disclosed

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

Individual	Role
Robert Patton	Owner / Partner
Christian Zawacki	Close Associate
Benjamin Bourque	Close Associate
Thomas Zawacki	Close Associate

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

Provisional License Executive Summary 1



Entity	Role
Reya Ventures, LLC	Capital Contributor

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on December 17, 2019.
8. The applicant conducted a community outreach meeting on November 4, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on April 16, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Hire at least 25% of individuals who are past or present residents of an area of disproportionate impact, specifically Southbridge; Commission-designated Economic Empowerment Priority Applicants; Commission-designated Social Equity Program Participants, Massachusetts residents who have past drug convictions; and Massachusetts residents with parents or spouses who have drug convictions.
2	Host and participate in events that will support the target communities, including annual donation drives and events in support of the Nick Perry Memorial Foundation in Southbridge and annual education seminars.
3	Provide a minimum donation of \$10,000.00 to the Nick Perry Memorial Foundation annually.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within 14 months of receiving the provisional license(s).

Provisional License Executive Summary 2



14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 24 hours per day (cultivation and product manufacturing)

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

#	Goal
1	Give hiring preference to minorities (37.6%), women (50.7%), veterans (7.2%) and people with disabilities (14.2%).
2	Green Meadows Farm seeks to comprise a management and executive team of at least 25% minorities, women, veterans and people with disabilities.

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	CO2 extracted concentrate; raw or dewaxed, with or without terpenes
2	Ice water extracted concentrate
3	Rosin
4	Dry sift
5	Distillate
6	Shatter
7	High Terpene Full Spectrum Extract Sauce
8	Pre-rolled products
9	Chewables (square shape) (lemon, green apple, raspberry)
10	Lozenges (square shape) (lemon ginger, green apple and raspberry)
11	Beverages (ginger orange juice, carrot beet juice and kale apple juice)
12	Capsules
13	Dab jars
14	Vape Cartridges
15	Topical products (lotion and pain balm)

Provisional License Executive Summary 3



16	Infused coffees (non-flavored, mocha and vanilla)
17	Oils - non-flavored
18	Tinctures (non-flavored, chocolate, mint, cinnamon, vanilla and maple)
19	Chocolate – perforated bar (dark chocolate and milk chocolate)

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

Not Applicable.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee;
5. 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; and
6. Final licensure is subject to the applicant providing Commission staff, upon inspection, an updated timeline of when its MTC license(s) will become operational.

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.



GTE FRANKLIN, LLC

MRN282766

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

GTE Franklin, LLC
1256 West Central St, Franklin, MA 02038

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 once 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. However, individuals and entities associated with this application are associated with another retail application under “GTE Taunton, LLC”.

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

Individual	Role
Chirag Patel	Manager
Hardik Patel	Manager
Jack Patel	Manager
Indravadan Patel	Manager
Mahendra Patel	Manager

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

Entity	Role
Green Tech Enterprises Inc	Parent Company
GTE Partners LLC	Parent Company
GTE Realty LLC	Capital Contributor

Provisional License Executive Summary 1



6. Applicant's priority status:

Expedited Applicant (Disadvantaged Business)

7. The applicant and municipality executed a Host Community Agreement on March 27, 2019.
8. The applicant conducted a community outreach meeting on May 7, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 26, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	GTE Franklin will make a minimum annual financial contribution of at least \$5,000 to Safe Coalition (SAFE).
2	Commit to serving communities that have been disproportionately impacted by serving individuals and organization through the contribution of employee volunteer time courtesy of the company with a goal of donating 8 hours per employee per year. GTE Franklin will also have a goal of 85% participation in the neighborhood clean-up program by its employees each calendar year.

SUITABILITY 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 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:
- Monday – Sunday: 10:00 a.m. – 8:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.

Provisional License Executive Summary 2



16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit and hire a diverse group of employees that values and promotes inclusiveness among the workforce with a goal of having a workforce that is at least 50% women and 35% minorities, LGBTQ+, persons with non-normative sexual identities, veterans, and persons with disabilities.
2	Work with at least 25% of businesses who identify as minorities, women, veterans, persons with disabilities, and individuals who are LGBTQ+ throughout its supply chain and services.

17. Summary of cultivation plan (if applicable):

Not applicable

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

Not applicable

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

GTE Franklin plans to 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



HEAL CULTIVATION, LLC

MCN282119

MPN281658

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Heal Cultivation, LLC
70 Pulaski Street, Warren, MA 01083

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

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

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 for any other license type. However, the individuals and entity associated with these applications are associated with two (2) adult-use retail applications and two (2) MTC provisional licenses under the name “Heal, Inc.”

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

Individual	Role
Patricia Faass	Manager
Alexander Oliphant	Owner / Partner
James Bonaccorsi	Owner / Partner

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

Entity	Role
TAJ Green, LLC	Capital Contributor

Provisional License Executive Summary 1



6. Applicant's priority status:

General Applicant
7. The applicant and municipality executed a Host Community Agreement on April 8, 2019.
8. The applicant conducted a community outreach meeting on April 24, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Warren on April 30, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide 80% of employees that work at least 30 hours per week will receive one (1) paid day off to participate in a service day in a community of impact.
2	Donate a minimum of \$1,000 on an annual basis to Southbridge Food Share, Inc, Center of Hope Foundation, Inc., and Nick Perry Memorial Foundation.

SUITABILITY 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 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:

Monday – Saturday: 7:00 a.m. – 10:00 p.m.
Sunday: 8:00 a.m. – 5:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:



#	Goal
1	Hire and maintain the number of minorities, women, veterans, people with disabilities, and people who identify as LGBT working in the establishment at the rate of 20% of its workforce.
2	Provide necessary tools to minorities, women, veterans, people with disabilities, and people who identify as LGBT to ensure opportunities for promotion are available.

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Flower
2	Pre-rolls
3	Concentrates
4	Infused Products (Topical salve, mints/ hard candies, capsules, chocolate bars, gummies, lip balm.)

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

Not applicable

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee;
5. 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; and
6. Final licensure is subject to the applicant providing Commission staff, upon inspection, an updated timeline of when its MTC license(s) will become operational.

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.

Provisional License Executive Summary 3



HOLISTIC INDUSTRIES INC.

MRN282667

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Holistic Industries Inc.
1300 Boston Road, Springfield, MA 01119

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 once for additional information.

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

Type	Status	Location
Cultivation – Tier 3/Indoor (10,001 – 20,000 sq. ft.)	Provisional License	Monson
Product Manufacturing	Provisional License	Monson
Retail	Provisional License	Easthampton
Transporter with Other ME License	Application Submitted	Monson
MTC	Commence Operations	Somerville – Monson
MTC	Provisional License	Easthampton - Monson

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

Individual	Role
Ismael Canales	Chief Security Officer
Joshua Genderson	CEO
Sarah Stretchberry	Dispensary Director
Jamie Ware	Compliance Officer
Adam Kavalier	Chief Scientific Officer
Barry Bass	CFO

Provisional License Executive Summary 1



Josh Bell	COO
Lori Genderson	Owner
Richard Genderson	Owner
Staci Walkes	Owner
Morgan Genderson	Owner
Michael Kessel	Close Associate
Mitchell Kulick	Close Associate
Mikhail Don	Close Associate
Beni Golani	Close Associate
David Cohen	Close Associate

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

Entity	Role
Avery Road, LLC	Entity with Direct or Indirect Authority
Liberty Capital Partners LLC	Entity with Direct or Indirect Authority

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on September 24, 2019.
8. The applicant conducted a community outreach meeting on May 14, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on April 14, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Contribute \$5,000 each to Monson Free Public Library and Monson Council on Aging on an annual basis.

SUITABILITY REVIEW

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

Provisional License Executive Summary 2



MANAGEMENT AND OPERATIONS 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:

Monday – Saturday: 10:00 a.m. – 8:00 p.m.
Sunday: 11:00 a.m. – 5:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit 50% of its staff that are minorities, persons with disabilities and women.
2	Recruit one (1) national Diversity Officer to establish new diversity plan policies and ensure their implementation through our employee staffing, retention and promotion plans.

17. Summary of cultivation plan (if applicable):

Not applicable
18. Summary of products to be produced and/or sold (if applicable):

Not applicable
19. Plan for obtaining marijuana or marijuana products (if applicable):

Holistic Industries, Inc. 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;

Provisional License Executive Summary 3



4. Provisional licensure is subject to the payment of the appropriate license fee; and
5. Final licensure is subject to the applicant providing Commission staff, upon inspection, an updated timeline of when its MTC license(s) will become operational.

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.



HOLYOKE 420, LLC
MRN282703

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Holyoke 420, LLC
d/b/a Holyoke Cannabis
380 Dwight Street, Suite 2, Holyoke, MA, 01040

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 once (1) 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. However, an individual associated with this application is also associated with two applications under “Coyote Cannabis Corporation”.

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

Individual	Role
James Jaron	Owner / Partner
Blake Mensing	Owner / Partner

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 June 17, 2019.
8. The applicant conducted a community outreach meeting on August 15, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Holyoke on March 27, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Donate a total of \$5,000.00 annually to the Cannabis Community Care and Research Network (\$2,500.00 annual donation) and the Massachusetts Recreational Consumer Council (\$2,500.00 annual donation).

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within five (5) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:
- Monday – Thursday: 8:00 a.m. – 8:00 p.m.
Friday – Saturday: 8:00 a.m. – 11:00 p.m.
Sunday: 8:00 a.m. – 7:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

Provisional License Executive Summary 2



#	Goal
1	Hire and retain at least 10% of the company's staff from people who represent diverse backgrounds.
2	Employ at least 10% of contractors, subcontractors, and suppliers who are listed in the Commonwealth of Massachusetts Directory of Certified Businesses as being a Minority Business Enterprise, a Women Business Enterprise, a Veteran Business Enterprise, a Lesbian Gay Bisexual Transgender Enterprise, a Service-Disabled Veteran-Owned Business Enterprise, or a Disability-Owned Business Enterprise, with particular consideration given to businesses classified as Disadvantaged Business Enterprises.

17. Summary of cultivation plan (if applicable):

Not applicable

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

Not applicable

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

Holyoke 420, LLC 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



HTC TRINITY, LLC
MRN283121

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

HTC Trinity, LLC
354 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):

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

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

Individual	Role
Kyra Fernandez	Owner / Partner

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 (Disadvantaged Business Enterprise)

7. The applicant and municipality executed a Host Community Agreement on November 6, 2019.

Provisional License Executive Summary 1



8. The applicant conducted a community outreach meeting on October 11, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on June 2, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide two (2) free educational seminars per year regarding the impact of under-age marijuana/drug use, the use of marijuana to address the opiate crisis, and parental engagement and education around teenage marijuana/drug use.
2	Donate \$5,000 annually to Avion Cares.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within five (5) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Saturday: 10:00 a.m. – 9:00 p.m.
Sunday: Closed
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit 60% women, 50% minorities, 30% veterans, 10% persons with disabilities, and 10% LGBTQ+.



17. Summary of cultivation plan (if applicable):

Not applicable

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

Not applicable

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

HTC Trinity LLC 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



HUDSON GROWERS ALLIANCE, LLC
MCN282581

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Hudson Growers Alliance, LLC
9 Kane Industrial Dr., Unit 2, Hudson, MA, 01749

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 once (1) 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. However, the individual associated with this application is also associated with a product manufacturing license under “Hudson Botanical Processing, LLC”.

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

Individual	Role
Kathleen Adams	Owner / Partner

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:

Provisional License Executive Summary 1



Expedited Applicant (Disadvantaged Business Enterprise)

7. The applicant and municipality executed a Host Community Agreement on December 11, 2019.
8. The applicant conducted a community outreach meeting on January 2, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 12, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Participate in two (2) volunteer opportunities with The Boys & Girls Club of Worcester.
2	Provide educational sessions and record sealing/expungement services for people affected by the war on drugs twice a year.
3	Pledge to give 1% of our net profit to social equity and economic empowerment applicants in the form of low-interest loans.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within 10 months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 24 hours per day
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:



#	Goal
1	Hire and retain at least 10% of the company's employees that represent minorities, women, veterans, people with disabilities, and people of the LGBTQ+ community.

17. Summary of cultivation plan (if applicable):

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

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

Not applicable

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

Not applicable

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



LMCC, LLC

MRN282885

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

LMCC, LLC
128 Myricks Street, Berkley, MA 02779

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):

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

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

Individual	Role
Flavia Hungaro	Owner / Partner
Irene Hicks	Owner / Partner

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:

Provisional License Executive Summary 1



Expedited Applicant (Social Equity Participant)

7. The applicant and municipality executed a Host Community Agreement on March 22, 2020.
8. The applicant conducted a community outreach meeting on February 25, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on June 3, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Recruit individuals from the City of Taunton.
2	Initiate a Community Clean-up in the City of Taunton.
3	Donate \$5,000 annually to the Matthew Mission.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within five (5) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 10:00 a.m. – 9:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Increase the number of minorities and women that are employed in the cannabis industry of Massachusetts.

Provisional License Executive Summary 2



2	Recruit women and minorities in management and executive positions and provide essential tools and training to ensure their success in these positions.
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17. Summary of cultivation plan (if applicable):

Not applicable

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

Not applicable

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

LMCC, LLC 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



MJ'S MARKET, INC.

MCN281274

MPN281758

MRN281457

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

MJ's Market, Inc.
13 Centennial Drive, Grafton, MA 01536

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

Cultivation – Tier 1 / Indoor (5,001 – 10,000 sq.ft.)
Product Manufacturing
Retail

The applications were reopened once (1) 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 business roles in the Marijuana Establishment:

Individual	Role
Heath Gaffney	Owner / Partner
Brian Foley	Owner / Partner

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:

Provisional License Executive Summary 1



General Applicant

7. The applicant and municipality executed a Host Community Agreement on June 12, 2019.
8. The applicant conducted a community outreach meeting on August 1, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 30, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide a minimum donation of at least \$5,000 to the CultivatED program annually to promote participation in the cannabis industry by those who have been disproportionately harmed by the marijuana prohibition.
2	Provide employees with a minimum of eight (8) hours per year paid time to participate in a neighborhood cleanup initiative that serves areas of disproportionate impact. MJ's Market will achieve 85% participation in the neighborhood clean-up program by its employees each calendar year.

SUITABILITY 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 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:

Monday – Saturday: 10:00 a.m. – 11:00 p.m.
Sunday: 11:00 a.m. – 9:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.



16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Give hiring preference to individuals identifying as women (50%), minorities, veterans, people with disabilities and people identifying as LGBTQ+ (25%).
2	Create gender-neutral job descriptions, recruit from local employment staffing groups such as MassHire Worcester Career Center and MassHire Framingham Career Center.
3	Participate in local hiring events and job fairs at least twice (2) annually.
4	Attend community group meetings in and around Worcester and Grafton at least twice (2) annually.
5	Source 15% of its contractors, vendors, suppliers and ancillary services to businesses/individuals identifying as women, minorities, veterans, people with disabilities and people who identify as LGBTQ+.

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Chocolate bars (rectangular shape); milk, white and dark.
2	Lozenges (square shape, hard candy); ginger, cherry red, tropical fruit, raspberry, grape, pineapple, lemon and watermelon.
3	Mini chocolate chip cookies (round shape).
4	Fruit chews (diamond shape, gummies); ginger, cherry red, tropical fruit, raspberry, grape, pineapple, lemon, watermelon.
5	Chews (cylindrical shape, soft candy); caramel.
6	Vapes; cannabis oil with reintroduced Terpenes, pure cannabis oil by strain, flavored cannabis oil
7	Shatter

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

MJ's Market, Inc. plans to obtain marijuana or marijuana products from its affiliated licenses. If the need arises, MJ's Market, Inc. 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 and local codes, ordinances, and bylaws;
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; and
5. 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.

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.



NEO MANUFACTURING MA, LLC

MCN282043

MPN281622

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Neo Manufacturing MA, LLC
4 Marc Road, Medway, MA 02053

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

Cultivation - Tier 3/Indoor (10,001 – 20,000 sq. ft.)
Product Manufacturing

The applications were 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 business roles in the Marijuana Establishment:

Individual	Role
Adam Patti	Employee
Chadwick Bair	Employee
Jaime Lewis	Employee

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

Entity	Role
Neo Organics MA, LLC	Parent Company
Neo Alternatives, LLC	Investment Manager

Provisional License Executive Summary 1



6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on March 5, 2019.
8. The applicant conducted a community outreach meeting on March 14, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on April 8, 2020 (cultivation only) stating the applicant was in compliance with all local ordinances or bylaws. The Commission sent the municipal notice to the City/Town of Medway on April 7, 2020 for the applicant's product manufacturing application. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Comprise 20% of its workforce from areas of disproportionate impact, specifically Walpole and Mansfield
2	Host mentorship and training programs quarterly, or four (4) times annually. Mentorship programs will help people with past drug convictions prepare for interviews, provide resources and training as well as provide recommendations to individuals and companies who believe people are entitled to a second chance. Training programs will help with resume writing, cover letter, interviewing, how to search for jobs and networking.
3	Host one (1) seminar annually which will detail general expungement information, record clearing basics and information specific to the process in the State of Massachusetts.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within six (6) months of receiving the provisional license(s).

Provisional License Executive Summary 2



14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 7:00 a.m. – 7:00 p.m.

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

#	Goal
1	Give hiring preference to minorities, veterans, people with disabilities, people who identify as LGBTQ+ (40%), and women (70%).

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Natural fruit leather (flat, rectangular shape); ginger, lemon, apple.
2	Chocolates (square shape); no flavor added.
3	Candies (square shape, gelatin based); ginger, lemon, apple.

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

Not Applicable.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee; and



5. 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.

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.



NEW GREEN, LLC
MRN282969

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

New Green, LLC
d/b/a Devine
71 Main Street, Egremont, MA 01258

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.

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

Individual	Role
Ari Zorn	Owner / Partner
Heidi Zorn	Owner / Partner

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 September 24, 2019.
8. The applicant conducted a community outreach meeting on May 9, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 1, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Establish a fund to pay full tuition at Berkshire Community College for the Cannabis Certificate program for 3-5 individuals who meet the criteria of disproportionately harmed individuals.
2	Provide mentoring and assist with resume writing and outreach to others in the cannabis industry.
3	Recruit individuals from Pittsfield for its hiring initiative.

SUITABILITY 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 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:

Monday – Sunday: 11:00 a.m. – 8:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:



#	Goal
1	Recruit 50% women, 25% minorities, 20% LGBTQ+, and 15% each of veterans, people with disabilities and economically-disadvantaged individuals.

17. Summary of cultivation plan (if applicable):

Not applicable

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

Not applicable

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

New Green, LLC 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



NEW LEAF ENTERPRISES, INC.
MRN283203

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

New Leaf Enterprises, Inc.
360 Second Street, Fall River, MA 02721

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):

Type	Status	Location
Retail	Application Submitted	Fall River

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

Individual	Role
Pedro Fernandes	Owner / Partner
Troy Rocha	Owner / Partner
John Medeiros	Capital Contributor

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

Entity	Role
Rockstar Elite Enterprises, Inc.	Capital Contributor

6. Applicant's priority status:

Expedited Applicant (Social Equity Participant)

Provisional License Executive Summary 1



7. The applicant and municipality executed a Host Community Agreement on July 16, 2019.
8. The applicant conducted a community outreach meeting on August 20, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Fall River on April 30, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide business assets (time, organization skills, finances) toward endeavors in the City of Fall River.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within eight (8) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Saturday: 10:00 a.m. – 9:00 p.m.
Sunday: 12:00 p.m. – 9:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Increase the number of minorities, women, veterans, people with disabilities, and people who identify as LGBTQ+ that work in the establishment.

17. Summary of cultivation plan (if applicable):

Provisional License Executive Summary 2



Not applicable

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

Not applicable

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

New Leaf Enterprises, Inc 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



NEW LEAF ENTERPRISES, INC.

MRN283204

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

New Leaf Enterprises, Inc.
2629 South Main Street, Fall River, MA 02721

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):

Type	Status	Location
Retail	Application Submitted	Fall River

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

Individual	Role
Pedro Fernandes	Owner / Partner
Troy Rocha	Owner / Partner
John Medeiros	Capital Contributor

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

Entity	Role
Rockstar Elite Enterprises, Inc.	Capital Contributor

6. Applicant's priority status:

Expedited Applicant (Social Equity Participant)

Provisional License Executive Summary 1



7. The applicant and municipality executed a Host Community Agreement on July 16, 2019.
8. The applicant conducted a community outreach meeting on August 20, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Fall River on April 30, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide business assets (time, organization skills, finances) toward endeavors in the City of Fall River.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within eight (8) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Saturday: 10:00 a.m. – 9:00 p.m.
Sunday: 12:00 p.m. – 9:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Increase the number of minorities, women, veterans, people with disabilities, and people who identify as LGBTQ+ that work in the establishment.

17. Summary of cultivation plan (if applicable):

Provisional License Executive Summary 2



Not applicable

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

Not applicable

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

New Leaf Enterprises, Inc 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



PATIENT CENTRIC OF MARTHA'S VINEYARD, LTD.

MCN282347

MPN281747

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Patient Centric of Martha's Vineyard, LTD.
90 Dr. Fisher Road, West Tisbury, MA 02568

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.)
Product Manufacturing

The application was reopened twice (2) 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
Retail	Application Submitted	Framingham
Retail	Application Submitted	West Tisbury
Retail	Application Submitted	Tisbury
MTC	Provisional License	West Tisbury -West Tisbury

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

Individual	Role
Geoffrey Rose	Owner/Partner

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

Entity	Role
High Street Capital Partners, LLC	Capital Contributor

Provisional License Executive Summary 1



6. Applicant's priority status:

MTC Priority

7. The applicant and municipality executed a Host Community Agreement on October 23, 2019.
8. The applicant conducted a community outreach meeting on September 14, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 7, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Conduct one (1) industry-specific educational seminar in New Bedford, with a goal of having at least 15 people at each seminar.
2	Provide an annual contribution of \$5,000 to the Old Colony YMCA.

SUITABILITY 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 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:
- Monday – Saturday: 9:00 a.m. – 6:00 p.m.
Sunday: 10:00 a.m. – 2:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

Provisional License Executive Summary 2



#	Goal
1	Give hiring preference to individuals identifying as minorities, women, veterans, people with disabilities and people who identify as LGBTQ+.
2	Distributing internal workplace newsletters every six (6) months that encourage current employees to recommend individuals falling in the listed demographics for employment.
3	Hosting two (2) job fairs annually with focus on attracting individuals falling into the listed demographics.

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Dissolving tablets and strips
2	Tinctures
3	Nasal/oral sprays
4	Suppositories
5	Ready-to-use extracted cannabis and hash distillates
6	Oil
7	Wax
8	Shatter
9	Budders
10	Live resin
11	Sap
12	Taffies
13	Crumbles
14	Moon rocks
15	Whole-plant cannabis and terpene extracts
16	Creams
17	Salves
18	Lotions
19	Body butters
20	Topicals
21	Dermal Patches
22	Capsules
23	Cooking Oils
24	Beverages



25	Sauces
26	Dips
27	Baked goods (Crispy rice buds - grape, blueberry and birthday cake)
28	Confections
29	Chocolates (Candy bar with coconut and almonds, truffles and peanut butter cups)
30	Candies (Fruit chews -lemonade, strawberry and blue raspberry)
31	Gums
32	Sugars
33	Salts
34	Syrups
35	Butters
36	Mints
37	Teas
38	Honey infusion; honey sticks, trail mix granola and popcorn mix.

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

Not Applicable.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee;
5. 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;
6. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications; and
7. Final licensure is subject to the applicant providing Commission staff, upon inspection, an updated timeline of when its MTC license(s) will become operational.

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.



PATIENT CENTRIC OF MARTHA’S VINEYARD, LTD.

MRN282947

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Patient Centric of Martha’s Vineyard, LTD.
510 State Road, West Tisbury, MA 02575

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 twice (2) for additional information.

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

Type	Status	Location
Cultivation, Tier 1/Indoor (up to 5,000 sq. ft.)	Application Submitted	West Tisbury
Product Manufacturing	Application Submitted	West Tisbury
Retail	Application Submitted	West Tisbury
Retail	Application Submitted	Tisbury
MTC	Provisional License	West Tisbury – West Tisbury

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

Individual	Role
Geoffrey Rose	Owner/Partner

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

Entity	Role
High Street Capital Partners, LLC	Capital Contributor

Provisional License Executive Summary 1



6. Applicant's priority status:

MTC Priority

7. The applicant and municipality executed a Host Community Agreement on October 23, 2019.
8. The applicant conducted a community outreach meeting on October 24, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 7, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Conduct one (1) industry-specific educational seminar in New Bedford, with a goal of having at least 15 people at each seminar.
2	Provide an annual contribution of \$5,000 to the Old Colony YMCA.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within 12 months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:
- Monday – Saturday: 9:00 a.m. – 6:00 p.m.
Sunday: 12:00 p.m. – 6:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

Provisional License Executive Summary 2



#	Goal
1	Give hiring preference to individuals identifying as minorities, women, veterans, people with disabilities and people who identify as LGBTQ+.
2	Distributing internal workplace newsletters every six (6) months that encourage current employees to recommend individuals falling in the listed demographics for employment.
3	Hosting two (2) job fairs annually with focus on attracting individuals falling into the listed demographics.

17. Summary of cultivation plan (if applicable):

Not Applicable.

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

Not Applicable.

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

Patient Centric of Martha's Vineyard 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee;
5. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications; and
6. Final licensure is subject to the applicant providing Commission staff, upon inspection, an updated timeline of when its MTC license(s) will become operational.

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.



PEAK LIMITED, LLC
MCN282217

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Peak Limited, LLC
114 Jewett Street, Georgetown, MA 01833

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

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

The application was reopened once (1) for additional information.

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

Type	Status	Location
Cultivation, Tier 2/Indoor (5,001 – 10,000 sq. ft.)	Provisional License	Georgetown
Product Manufacturing	Provisional License	Georgetown
Product Manufacturing	Application Submitted	Georgetown

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

Individual	Role
Matthew Kumph	Owner / Partner
Kenneth Kumph	Owner / Partner

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:

Provisional License Executive Summary 1



General Applicant

7. The applicant and municipality executed a Host Community Agreement on September 17, 2018.
8. The applicant conducted a community outreach meeting on June 12, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of George Town on March 27, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Hire at least 25% of its employees from Haverhill, Lowell and Lynn and/or Massachusetts residents who have or have parents or spouses who have past drug convictions.
2	Provide forty (40) hours of volunteer time to charitable groups serving Haverhill, Lowell and Lynn.
3	Provide a contribution of \$10,000.00 to charitable groups serving Haverhill, Lowell, Lynn and/or Massachusetts residents who have past drug convictions, and Massachusetts residents with parents or spouses who have past drug convictions.
4	Provide educational programs and information sessions geared towards individuals interested in the cannabis industry with a specific focus on cultivators, product manufactures or retailers and entrepreneurship at least twice (2) a year.
5	Host two (2) events through its “Reach your Peak” initiative.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within 12 months of receiving the provisional license(s).
14. The applicant’s proposed hours of operation are the following:

Provisional License Executive Summary 2



Monday – Sunday: 8:00 a.m. – 7:00 p.m.

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

#	Goal
1	Give hiring preference to individuals who identify as minorities, women, veterans, people with disabilities and people identifying as LGBTQ+.
2	Offer advancement to management and executive positions internally. All opportunities for advancement will be posted internally (100%).
4	Ensure all its employees receive training on diversity and sensitivity within the first ninety (90) days of employment.

17. Summary of cultivation plan (if applicable):

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

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

Not Applicable.

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

Not Applicable.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



PEAK LIMITED, LLC
MPN281707

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Peak Limited, LLC
113 Jewett Street, Georgetown, MA 01833

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 once (1) for additional information.

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

Type	Status	Location
Cultivation, Tier 2/Indoor (5,001 – 10,000 sq. ft.)	Application Submitted	Georgetown
Product Manufacturing	Application Submitted	Georgetown
Cultivation, Tier 2/Indoor (5,001 – 10,000 sq. ft.)	Application Submitted	Georgetown

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

Individual	Role
Matthew Kumph	Owner / Partner
Kenneth Kumph	Owner / Partner

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.

Provisional License Executive Summary 1



6. Applicant's priority status:

General Applicant
7. The applicant and municipality executed a Host Community Agreement on September 17, 2018.
8. The applicant conducted a community outreach meeting on June 12, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Georgetown on March 27, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Hire at least 25% of its employees from Haverhill, Lowell and Lynn and/or Massachusetts residents who have or have parents or spouses who have past drug convictions.
2	Provide forty (40) hours of volunteer time to charitable groups serving Haverhill, Lowell and Lynn.
3	Provide a contribution of \$10,000.00 to charitable groups serving Haverhill, Lowell, Lynn and/or Massachusetts residents who have past drug convictions, and Massachusetts residents with parents or spouses who have past drug convictions.
4	Provide educational programs and information sessions geared towards individuals interested in the cannabis industry with a specific focus on cultivators, product manufactures or retailers and entrepreneurship at least twice (2) a year.
5	Host two (2) events through its "Reach your Peak" initiative.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within 10 months of receiving the provisional license(s).



14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 8:00 a.m. – 7:00 p.m.

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

#	Goal
1	Give hiring preference to individuals who identify as minorities, women, veterans, people with disabilities and people identifying as LGBTQ+.
2	Offer advancement to management and executive positions internally. All opportunities for advancement will be posted internally (100%).
3	Ensure all its employees receive training on diversity and sensitivity within the first ninety (90) days of employment.

17. Summary of cultivation plan (if applicable):

Not Applicable.

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

#	Product
1	Chocolate bar (mocha crunch peak bar, salted almond dark chocolate bars, mint chocolate bar, milk chocolate bar
2	Gummies (cube shape); pomegranate and watermelon
3	Blueberry THC paleo bars
4	Lozenges (mango)
5	Chews (cube shape) (tangerine and blue raspberry)
6	Topicals
7	Lotions
8	Salves
9	Oils
10	Sprays
11	Waxes
12	Shatter
13	Vape oil
14	Tinctures
15	Keif

Provisional License Executive Summary 3



16	Pre-rolled cannabis joints
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19. Plan for obtaining marijuana or marijuana products (if applicable):

Not Applicable.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee; and
5. 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.

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.



ROYAL HEMP LLC

MPN281741

MRN282799

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Royal Hemp LLC
660 Cheshire Road, Lanesborough, MA 01224

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

Product Manufacturing
Retail

The application was reopened twice (2) 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 business roles in the Marijuana Establishment:

Individual	Role
Lev Kelman	Owner / Partner
Lori Denman	Close Associate

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

No entities appear to have ownership or control over the proposed establishment.

6. Applicant's priority status:

General Applicant

Provisional License Executive Summary 1



7. The applicant and municipality executed a Host Community Agreement on August 5, 2019.
8. The applicant conducted a community outreach meeting on May 15, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on April 7, 2019 for its Retail application stating the applicant was in compliance with all local ordinances or bylaws. The Commission sent the municipal notice to the City/Town of Lanesborough on April 7, 2020 for its Product Manufacturing application. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Host seminars to directly assist members of the PTG by providing participants with knowledge, resources, tools and guidance to strengthen, promote and empower their successful participation in this industry as an entrepreneur, business owner, or employee.
2	Conduct weekly telephone conferences that comprises a 60-minute check-in with PTG participants, with a Q&A session, followed by a number of, 30-minute, pre-booked individual calls that allow PTG participants to pose or discuss business sensitive or confidential questions.
3	Seminar participants will be offered free, ongoing access to a web-based, “help-desk” facility that provides access to the knowledge and experience of professional industry consultants with expertise in Business Development, Marijuana Licensing, Federal and State law, and accounting.

SUITABILITY 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 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:

Monday – Friday: 9:00 a.m. – 7:00 p.m.
Sunday: 9:00 a.m. – 5:00 p.m.

Provisional License Executive Summary 2



15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.

16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Diversity goal of employing 20% or more women and or veterans in retail and management positions to help them achieve their goal of entering the adult-use marijuana industry.
2	Women and veterans will be offered opportunities to shadow their immediate supervisor to help achieve a transfer of the skills, knowledge, and responsibilities that this role demands.
3	Participate in job and recruitment fairs- no less than annually when employees are needed- that specifically target women and veterans.

17. Summary of cultivation plan (if applicable):

Not applicable.

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

#	Product
1	Flower
2	Concentrates
3	Chocolate shell with a soft filling, or a formed chocolate mixture, either of which contains extracted cannabis oil.
4	Chocolate, marzipan, hazelnut, mint, caramel, mango, strawberry, and raspberry flavors.

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

Royal Hemp, LLC 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 and local codes, ordinances, and bylaws;

Provisional License Executive Summary 3



3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee;
5. 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; and
6. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.

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.



SALISBURY CULTIVATION AND PRODUCTION MANUFACTURING, LLC

MCN282530

MPN281819

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Salisbury Cultivation and Product Manufacturing LLC
D/B/A Root and Bloom
187 Lafayette Road, Salisbury, MA 01952

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

Cultivation – Tier 3/ Indoor (10,001 to 20,000 sq. ft)
Product Manufacturing

The application was reopened once 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 business roles in the Marijuana Establishment:

Individual	Role
George Haseltine	Owner / Partner
Bradley Kutcher	Owner / Partner

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

Entity	Role
GBH, Inc.	Entity with Direct or Indirect Authority
The Haseltine Family Revocable Trust	Entity with Direct or Indirect Authority

Provisional License Executive Summary 1



6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on July 15, 2019.
8. The applicant conducted a community outreach meeting on August 22, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Salisbury on April 15, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Donate money and time (\$1000.00 and 100 hours) to help nonprofits and social service programs in areas of disproportionate impact.
2	Give hiring preference to individuals who are residents of Haverhill, Commission-designated Economic Empowerment Priority applicants, Commission-designated Social Equity Program participants, Massachusetts residents who have past drug convictions, and Massachusetts residents with parents or spouses who have drug convictions.

SUITABILITY 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 REVIEW

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

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



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

#	Goal
1	Give hiring preference to individuals who are minorities, women, veterans, people with disabilities, and people who are LGBTQ+.
2	Contract with suppliers and contractors who are owned by minorities, women, veterans, people who are LGBTQ+, and persons with disabilities.

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Extractions (Rosin, Ice Water Hash, Shatter, Wax)
2	Vaporizer Cartridges
3	Chocolate Bars
4	Hard Lozenges (Lemon, Grape, and Cherry flavored)
5	Gummy Squares (Lemon, Grape, and Cherry)
6	Baked Goods (Chocolate cookies and Brownies)

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

Not applicable.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee; and



5. 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.

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.



SALTY FARMERS, LLC
MCN282276

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Salty Farmers, LLC
120 Holmes Road, Eastham, MA 02651

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 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):

Type	Status	Location
Retail	Application Submitted	Eastham

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

Individual	Role
Harlen Howard	Executive / Officer
Jonah Turner	Executive / Officer
David Selenow	Owner / Partner
Thomas Hayes	Director

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:

Provisional License Executive Summary 1



General Applicant

7. The applicant and municipality executed a Host Community Agreement on May 20, 2019.
8. The applicant conducted a community outreach meeting on April 23, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 21, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Offer management training and/or other forms of industry specific technical training held twice a year.
2	Donate 1% of net income annually to the Fishing Partnership of New Bedford.
3	Require a minimum of four (4) staff members to attend at least eight (8) hours of member services programs annually.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within two (2) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 24 hours per day
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:



#	Goal
1	Recruit 25% of women agents, 10% veteran agents, 10% LGBTQ agents and 5% minorities.
2	Hold internal training twice a year with an emphasis on career advancement and management opportunities.

17. Summary of cultivation plan (if applicable):

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

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

Not applicable

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

Not applicable

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



SALTY FARMERS, LLC
MRN282640

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Salty Farmers, LLC
182 Brackett Road, Eastham, MA 02651

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
Cultivation – Tier 1/ Indoor (up to 5,000 sq.ft)	Application Submitted	Eastham

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

Individual	Role
Harlen Howard	Executive / Officer
Jonah Turner	Executive / Officer
David Selenow	Owner / Partner
Thomas Hayes	Director

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:

Provisional License Executive Summary 1



General Applicant

7. The applicant and municipality executed a Host Community Agreement on May 9, 2019.
8. The applicant conducted a community outreach meeting on April 23, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 21, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Offer management training and/or other forms of industry specific technical training held twice a year.
2	Donate 1% of net income annually to the Fishing Partnership of New Bedford.
3	Require a minimum of four (4) staff members to attend at least eight hours of member services programs annually.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within two (2) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 10:00 a.m. – 6:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

Provisional License Executive Summary 2



#	Goal
1	Recruit 25% of women agents, 10% veteran agents, 10% LGBTQ agents and 5% minorities.
2	Hold internal training twice a year with an emphasis on career advancement and management opportunities.

17. Summary of cultivation plan (if applicable):

Not applicable

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

Not applicable

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

Salty Farmers, LLC 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



SOLURGE, INC.

MCN281300

MPN281591

MRN282372

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Solurge, Inc.

650 Beaulieu Street, Holyoke, MA 01040

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

Cultivation – Tier 3/ Indoor (10,001 to 20,000 sq. ft)

Product Manufacturing

Retail

The application was reopened twice (2) 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
MTC	Provisional License	Holyoke

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

Individual	Role
Adam Arens	Executive / Officer
Andrew Arens	Executive / Officer
David Kotler	Executive / Officer
Thomas Rubel	Manager
Lisa Arens	Capital Contributor
Perri Arens	Capital Contributor

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

Provisional License Executive Summary 1



Entity	Role
Patriot Realty Saco, LLC	Capital Contributor

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on May 1, 2018.
8. The applicant conducted a community outreach meeting on April 18, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 19, 2020 (cultivation), April 30, 2020 (product manufacturing), and April 8, 2020 (retail) stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Recruit at least 33% of individuals from Holyoke.
2	Recruit at least two (2) individuals with past non-disqualifying drug convictions.
3	Pledge a minimum of \$5,000 annually to Verde Fund.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within three months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:
Monday – Sunday: 8:00 a.m. – 8:00 p.m. (Cultivation and Product Manufacturing)
Monday – Saturday: 8:00 a.m. – 8:00 p.m. (Retail)
Sunday: 8:00 a.m. – 5:00 p.m. (Retail)



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

#	Goal
1	Recruit 33% Minorities, 50% Women, 10% Veterans, 5% People with disabilities, and 5% LGBTQ+.
2	Provide advancement opportunities to 33% Minorities, 50% Women, 10% Veterans, 5% People with disabilities, and 5% LGBTQ+.
3	Provide access for potential social equity applicants to achieve their goal of entering the adult-use marijuana industry by having two (2) licensing and business mentoring sessions geared toward the social equity license process.

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Flower
2	Concentrates
3	Topicals
4	Strawberry Gummies in a circular form
5	Chocolate flavored brownies in a square shape
6	Chocolate bars in a rectangular shape

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

Solurge, Inc. plans to obtain marijuana or marijuana products from its affiliated licenses. If the need arises, Solurge, Inc. 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;

Provisional License Executive Summary 3



4. Provisional licensure is subject to the payment of the appropriate license fee;
5. 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;
6. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications; and
7. Final licensure is subject to the applicant providing Commission staff, upon inspection, an updated timeline of when its MTC license(s) will become operational.

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.



TEN-TEN, LLC

MCN282523

MCN282524

MPN281809

MRN283165

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Ten-Ten, LLC

775 N. Main Street, Sheffield, MA 01257

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

Cultivation – Tier 3 / Indoor (10,001 – 20,000 sq. ft)

Cultivation – Tier 3 / Outdoor (10,001 – 20,000 sq. ft)

Product Manufacturing

Retail

The applications were 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.

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

Individual	Role
Scot Trifilo	Owner / Partner

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

Provisional License Executive Summary 1



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

6. Applicant's priority status:

General Applicant

Expedited Applicant (License Type) (Outdoor Cultivation application only)

7. The applicant and municipality executed a Host Community Agreement on September 4, 2018.
8. The applicant conducted a community outreach meeting on December 3, 2019 and December 19, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 6, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide effective industry-specific education to 30 participants in 2 sessions per year in Pittsfield, with 80% of participants from areas of disproportionate impact.
2	Provide financial education to 45 participants per year in Pittsfield, with 80% of the participants from areas of disproportionate impact.
3	Hold local criminal record sealing and expunging events with 25 participants twice per year in Pittsfield.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within one (1) year of receiving the provisional license(s).



14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 8:00 a.m. – 8:00 p.m. (both cultivation and product manufacturing)

Monday – Sunday: 10:00 a.m. – 8:00 p.m. (retail)

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

#	Goal
1	Recruit a minimum of 25% of its workforce from minorities, women, veterans, people with disabilities, and the LGBTQ+ community.
2	Annually increase the number of minorities, women, veterans, people with disabilities, and LGBTQ+ individuals that are working in management and executive positions to 25%.
3	Contract with 25% of vendors, suppliers, and service providers that are minorities, women, veterans, people with disabilities, and LGBTQ+.

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Ready-to-use extracted cannabis and has distillates, oils, waxes, shatters and other whole-plant cannabis and terpene extracts designed to be pre-heated.
2	Chocolate bars (milk and dark chocolates)

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

Ten-Ten, LLC plans to obtain marijuana from its affiliated licenses. If the need arises, Ten-Ten, LLC will obtain marijuana or marijuana products by contracting with other licensed establishments.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

Provisional License Executive Summary 3



1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



THE BOTANIST, INC.
MRN282160

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

The Botanist, Inc.
65 Pullman Street, Worcester, MA 01606

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):

Type	Status	Location
Retail	Application Submitted	Shrewsbury
MTC	Provisional License	Leominster
MTC	Provisional License	Shrewsbury
MTC	Commence Operations	Worcester

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

Individual	Role
Kevin Murphy	Director
Christopher Tolford	Director
Jovan Bethell	Director
Robert Daino	Close Associate
Francis Matthews	Close Associate

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

Entity	Role
Acreage Holdings, Inc.	Sole Shareholder

Provisional License Executive Summary 1



6. Applicant's priority status:

MTC Priority

7. The applicant and municipality executed a Host Community Agreement on July 18, 2018.
8. The applicant conducted a community outreach meeting on November 26, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on August 1, 2019 stating the applicant was in compliance with all local ordinances and bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide mentoring, professional, and technical services for individuals and businesses facing systemic barriers.
2	Host two (2) industry-specific educational seminars annually.

SUITABILITY REVIEW

11. There were disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions. These disclosures did not raise suitability issues.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within three (3) months of receiving the provisional license.
14. The applicant's proposed hours of operation are the following:
- Monday – Saturday: 9:00 a.m. – 9:00 p.m.
Sunday: 9:00 a.m. – 7:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

2



#	Goal
1	Host four (4) career fairs in Worcester.
2	Provide annual cultural training on cultural sensitivity and recognizing unconscious bias.

17. Summary of cultivation plan (if applicable):

Not applicable.

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

Not applicable.

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

The applicant intends to apply for additional marijuana establishment licenses, therefore, it 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 and local codes, ordinances, and bylaws;
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; and
5. Final licensure is subject to the applicant, upon inspection, submitting to Commission staff an updated timeline as to when its MTC licenses will become operational.

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 BOTANIST, INC.
MRN282186

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

The Botanist, Inc.
235 Hartford Turnpike, Shrewsbury, MA 01545

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):

Type	Status	Location
Retail	Application Submitted	Worcester
MTC	Provisional License	Leominster
MTC	Provisional License	Shrewsbury
MTC	Commence Operations	Worcester

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

Individual	Role
Kevin Murphy	Director
Christopher Tolford	Director
Jovan Bethell	Director
Robert Daino	Close Associate
Francis Matthews	Close Associate

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

Entity	Role
Acreage Holdings, Inc.	Sole Shareholder

Provisional License Executive Summary 1



6. Applicant's priority status:

MTC Priority

7. The applicant and municipality executed a Host Community Agreement on July 12, 2018.
8. The applicant conducted a community outreach meeting on December 6, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on January 3, 2020 stating the applicant was in compliance with all local ordinances and bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide mentoring, professional, and technical services for individuals and businesses facing systemic barriers.
2	Host two (2) industry-specific educational seminars annually.

SUITABILITY REVIEW

11. There were disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions. These disclosures did not raise suitability issues.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within three (3) months of receiving the provisional license.
14. The applicant's proposed hours of operation are the following:
- Monday – Sunday: 9:00 a.m. – 9:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:



#	Goal
1	Host four (4) career fairs in Worcester.
2	Provide annual cultural training on cultural sensitivity and recognizing unconscious bias.

17. Summary of cultivation plan (if applicable):

Not applicable.

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

Not applicable.

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

The applicant intends to apply for additional marijuana establishment licenses, therefore, 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license; and
5. Final licensure is subject to the applicant, upon inspection, submitting to Commission staff an updated timeline as to when its MTC licenses will become operational.

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 FRESH CONNECTION BOSTON, LLC

MCN281442

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

The Fresh Connection Boston, LLC
175-195 Kimball Street, Fitchburg, MA, 01420

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

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

The application was reopened twice (2) 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 business roles in the Marijuana Establishment:

Individual	Role
William Seagaard	Executive / Officer
Samantha Seagaard	Executive / Officer
Zachary Swanson	Executive / Officer

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

Entity	Role
Frais Cannexion, Inc.	Entity with Direct or Indirect Authority

6. Applicant's priority status:

Provisional License Executive Summary 1



General Applicant

7. The applicant and municipality executed a Host Community Agreement on May 9, 2019.
8. The applicant conducted a community outreach meeting on April 10, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on April 17, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Host at least one (1) educational event every quarter for members of the local community.
2	Hire at least 25% of its workforce from Fitchburg and other areas of disproportionate impact.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

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

Monday – Sunday: 9:00 a.m. – 5:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
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Provisional License Executive Summary 2



1	Recruit at least 60% of individuals that comprise of minorities, women, veterans, or persons with disabilities.
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17. Summary of cultivation plan (if applicable):

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

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

Not applicable.

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

Not applicable.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



THE HIGH END CHOCOLATE COMPANY, LLC

MPN281656

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

The High End Chocolate Company, LLC
d/b/a The High End
110 Winter Street, Holyoke, MA 01040

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 one (1) times for additional information.

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

Type	Status	Location
Cultivation, Tier 4/Indoor (20,001 – 30,000 sq. ft.)	Application Submitted	Holyoke

Individuals and entities associated with this application are also associated with a retail application under the name The High End Wellness Company, LLC.

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

Individual	Role
Helen Gomez	Executive / Officer
Rudolfo Ellenbogen Rivero	Close Associate

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

Entity	Role
Eureka Enterprises, LLC	Personal Holding Company

Provisional License Executive Summary 1



Capstone Business Funding, LLC	Capital Contributor
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6. Applicant's priority status:

Expedited Applicant (Disadvantaged Business Enterprise)

7. The applicant and municipality executed a Host Community Agreement on November 5, 2018.
8. The applicant conducted a community outreach meeting on September 23, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 19, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Develop and provide 12 educational events per year, free of charge to Holyoke residents.
2	Provide annual donations of at least \$1,000 annually to an organization that supports entrepreneurship in Holyoke (SPARK Holyoke / E-for-All / E-pa-Todos)
3	Provide at least \$1,000 to an organization that supports urban agriculture in Holyoke (OneHolyoke CDC).

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within 10 months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Saturday: 8:00 a.m. – 8:00 p.m.
Sunday: 8:00 a.m. – 5:00 p.m.



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

#	Goal
1	Recruit at least 50% women, minorities, persons with disabilities LGBTQ+ and veterans for its hiring initiatives.

17. Summary of cultivation plan (if applicable):

Not applicable

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

#	Product
1	Concentrates (Tinctures, Distillate oil, Distillate oil vape cartridge, Rosin, Rosin wax, Ice Hash, Ice oil, Ice oil tincture, ice oil vape cartridge)
2	Chocolate bars (White with fruit or nut segments)
3	Chocolate truffles (White with fruit or nut segments)
4	Hard Candy (Toffee, Fruit, Nut, Herbal flavoring)
5	Jelly Candy (Fruit or Herbal)
6	Lozenges (Fruit or Herbal)
7	Mints (Fruit or Herbal)
8	Cooking Oil (Olive-oil and/or Coconut-oil)
9	Salves (Natural with fruit, nut or herbal scent)

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

Not applicable

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee; and

Provisional License Executive Summary 3



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

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 HIGH END WELLNESS COMPANY, LLC

MRN282666

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

The High End Wellness Company, LLC
384 Dwight Street, Holyoke, MA 01040

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) 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.

Individuals and entities associated with this application are also associated with a product manufacturing application under the name The High End Chocolate Company, LLC.

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

Individual	Role
Helen Gomez	Executive / Officer
Rudolfo Ellenbogen Rivero	Close Associate

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

Entity	Role
Eureka Enterprises, LLC	Personal Holding Company
Capstone Business Funding, LLC	Capital Contributor

6. Applicant's priority status:

Provisional License Executive Summary 1



Expedited Applicant (Disadvantaged Business Enterprise)

7. The applicant and municipality executed a Host Community Agreement on March 3, 2020.
8. The applicant conducted a community outreach meeting on September 23, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on May 26, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Develop and provide 12 educational events per year, free of charge to Holyoke residents.
2	Provide annual donations of at least \$1,000 annually to an organization that supports entrepreneurship in Holyoke (SPARK Holyoke / E-for-All / E-pa-Todos)
3	Provide at least \$1,000 to an organization that supports urban agriculture in Holyoke (OneHolyoke CDC).

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within 10 months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Saturday: 8:00 a.m. – 8:00 p.m.
Sunday: 8:00 a.m. – 5:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.



16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Recruit at least 50% women, minorities, persons with disabilities LGBTQ+ and veterans for its hiring initiatives.

17. Summary of cultivation plan (if applicable):

Not applicable

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

Not applicable

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

The High End Wellness Company, LLC plans to obtain marijuana from its affiliated licenses. If the need arises, The High End Wellness Company, LLC 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 and local codes, ordinances, and bylaws;
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; and
5. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.

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 HUB CRAFT, LLC

MCN282323

MPN281740

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

The Hub Craft, LLC
25 Newport Street, Fitchburg, MA, 01420

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

Cultivation - Tier 3/Indoor (10,001 - 20,000 sq. ft.)
Product Manufacturing

The application was reopened once (1) 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 business roles in the Marijuana Establishment:

Individual	Role
Howard Mao Tanyu	Owner / Partner

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

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on May 9, 2019.

Provisional License Executive Summary 1



8. The applicant conducted a community outreach meeting on February 13, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Fitchburg on April 7, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Recruit and hire individuals with a preference for past or present residents of the geographic areas of disproportionate impact, specifically the City of Fitchburg.
2	Partner with an established community organization that provides direct social services to Fitchburg Residents
3	Participate in job fairs and workshops hosted by the MassHire North Central Career Center.
4	Donate a minimum amount of \$15,000 to Our Father's House, Inc. to support the service programs that they offer to Fitchburg residents.
5	Offer each 30+ hour employee with 3+ months company tenure 10 hours of paid volunteerism to assist Our Fathers House. We expect to deliver at least 140 paid volunteer hours in our first year.

SUITABILITY REVIEW

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

MANAGEMENT AND OPERATIONS REVIEW

13. The applicant states that it can be operational within six (6) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 24 hours per day
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.

Provisional License Executive Summary 2



16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Hire and retain at least 60% of employees comprising of minorities, veterans, people with disabilities and/or people who are LBGTQ+.
2	Hire and retain at least 50% of employees comprising of women.

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Extractions (Rosin, Ice Water Hash, Ethanol derived concentrates)
2	Vaporizer Cartridges
3	Ethanol Derived Concentrate Plungers
4	Confections (Chocolate bars and candies, caramels and peanut butter cups)
5	Baked Goods (cookies and brownies)

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

Not applicable.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff;
4. Provisional licensure is subject to the payment of the appropriate license fee;
5. 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; and
6. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.



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.



TREE MARKET TAUNTON, LLC
MRN281597

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Tree Market Taunton LLC
9 Cape Road, 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 once (1) 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 business roles in the Marijuana Establishment:

Individual	Role
Eli Volynsky	Executive / Officer
Daniel Razore	Executive / Officer

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

Entity	Role
The Vault Holding LLC	Parent Company

6. Applicant's priority status:

General Applicant

Provisional License Executive Summary 1



7. The applicant and municipality executed a Host Community Agreement on February 25, 2019 which was amended on June 7, 2019.
8. The applicant conducted a community outreach meeting on March 14, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 24, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Hire at least 25% of the company's employees from residents of Massachusetts and individuals within the Commission-approved areas of disproportionate impact.
2	Contribute a minimum of 40 hours of volunteer time to charitable groups serving the Commission-approved areas of disproportionate impact.
3	Donate at minimum \$10,000 to charitable groups serving the Commission-approved areas of disproportionate impact.
4	Provide education programs that focus on the cannabis industry, marijuana retailers, and entrepreneurship, at least twice per year.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within 19 months after receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Thursday: 9:00 a.m. – 10:00 p.m.

Friday – Saturday: 9:00 a.m. – 11:00 p.m.

Sunday: 11:00 a.m. – 7:00 p.m.



15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.

16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Provide job opportunities to at least 10% of individuals who are minorities, women, veterans, people with disabilities, and LGBTQ+.
2	Offer 100% of the company's opportunities for advancement to management and executive positions internally, thereby providing opportunities to its diverse workforce.
3	Provide employee training on diversity and sensitivity.

17. Summary of cultivation plan (if applicable):

Not applicable.

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

Not applicable.

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

Tree Market Taunton, LLC 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



UNION LEAF, INC.
MRN282570

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Union Leaf, Inc.
71-72 Union Square, Somerville MA 02143

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 once (1) 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 business roles in the Marijuana Establishment:

Individual	Role
Laxmi Pradhan	Executive / Officer

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 October 21, 2019.
8. The applicant conducted a community outreach meeting on October 9, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on June 2, 2020 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Hire and retain at least 10% of Massachusetts residents who have past drug convictions or Massachusetts residents with parents or spouses who have drug convictions.
2	Hold at least two (2) educational seminars per calendar year for Massachusetts residents who have past drug convictions or Massachusetts residents with parents or spouses who have drug convictions.
3	Give hiring preference to individuals who provide evidence of being Commission designated Economic Empowerment Priority applicants.

SUITABILITY 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 REVIEW

13. The applicant states that it can be operational within 10 months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Saturday: 10:00 a.m. – 8:00 p.m.
Sunday: 10:00 a.m. – 5:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

Provisional License Executive Summary 2



#	Goal
1	Source at least 25% of contractors and third-party vendors utilized by Union Leaf will be Minority Business Enterprises or Women Business Enterprises, as certified by the Massachusetts Supplier Diversity Office.
2	Implementing a workforce development program that emphasizes diversity and inclusion at Union Leaf through trainings for all employees no less than annually.

17. Summary of cultivation plan (if applicable):

Not applicable.

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

Not applicable.

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

Union Leaf Inc. 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



VOLCANN, LLC
MRN282925

BACKGROUND & APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Volcann, LLC
d/b/a Dreamer
15 College Highway, Unit G2, Southampton, MA 01073

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 once (1) 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 business roles in the Marijuana Establishment:

Individual	Role
Volkan Polatol	Owner / Partner

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 August 20, 2019.
8. The applicant conducted a community outreach meeting on July 9, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Southampton on March 27, 2020. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide Holyoke, MA communities access to training, educational and mentorship resources, with a goal of attracting 25% of attendees from the Commission-approved areas of disproportionate impact, quarterly.

SUITABILITY 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 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:

Monday – Friday: 9:00 a.m. – 7:00 p.m.
Saturday – Sunday: 9:00 a.m. – 5:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Employ 20% or more women and or veterans in retail and management positions to help them achieve their goal of entering the adult-use marijuana industry.



2	Distribute internal workplace information sheets, bi-annually, aimed at encouraging current employees to recommend women and veterans for employment.
3	Participate in job and recruitment fairs- no less than annually when employees are needed- that specifically target women and veterans.
4	Offer supervisor shadowing opportunities to women and veteran employees.

17. Summary of cultivation plan (if applicable):

Not applicable.

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

Not applicable.

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

Volcann, LLC 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 and local codes, ordinances, and bylaws;
3. The applicant shall cooperate with and provide information to Commission staff; and
4. Provisional licensure is subject to the payment of the appropriate license fee.

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



Feasibility of Alternative Cannabis Tax Schemes:

A Legislative Report & Recommendation for Massachusetts

July 2020

Massachusetts Cannabis Control Commission:

Steven J. Hoffman, Chairman
Jennifer Flanagan, Commissioner
Britte McBride, Commissioner
Shaleen Title, Commissioner

Shawn Collins, Executive Director

Prepared by Massachusetts Cannabis Control Commission in collaboration with
Massachusetts Department of Revenue

Alisa Stack, Chief Operating Officer, Cannabis Control Commission
Julie K. Johnson, Director of Research, Cannabis Control Commission

Geoffrey E. Snyder, Commissioner, Department of Revenue
Kevin E. Brown, General Counsel, Department of Revenue
Kazim Ozyurt, Chief Economist, Department of Revenue

Acknowledgements

Cannabis Control Commission

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Kyle Potvin, Director of Licensing
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Department of Revenue

Tim Rooney, Chief Financial Officer
Fushang Liu, Supervising Economist, Office of Tax Policy & Analysis
John Paul Murphy, Senior Economist, Office of Tax Policy & Analysis
Paul Casey, Deputy Commissioner, Legislative, External Affairs & Policy
Nathalie Dailida, Director, Legislative & External Affairs
Bill Graham, Senior Deputy Commissioner, Tax Administration
Steve Moffatt, Deputy Commissioner, Tax
Evan Garcia, Director, Miscellaneous Excises



Purpose

This report, *Feasibility of Alternative Cannabis Tax Schemes: A Legislative Report & Recommendation for Massachusetts*, supplemented by the study, *Assessment of Alternative Tax Models for Adult-Use Cannabis in Massachusetts*, has been prepared in response to the enabling legislation, Chapter 55 of the Acts of 2017 section 63:

“The Massachusetts cannabis control commission, in collaboration with the department of revenue, shall study the feasibility of alternative tax bases for calculating taxes on marijuana and marijuana products, including by weight, volume or tetrahydrocannabinol potency. The commission shall file the results of this study together with any recommendations for changes to marijuana tax policy with the clerks of the senate and the house of representatives, who shall forward the recommendations to the senate and house chairs of the joint committee on marijuana policy and the senate and house chairs of the joint committee on revenue not later than July 1, 2020.”

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Executive Summary

This legislative report has been prepared in response to the enabling legislation, Section 63 of Chapter 55 of the Acts of 2017, to assess feasibility in implementing varying adult-use cannabis market tax schemes. A comprehensive assessment on varying price, weight, and potency-based schemes was contracted and conducted by KPMG LLP (KPMG).

All of the varying tax schemes assessed could feasibly be implemented in Massachusetts [[See KPMG study for all schemes assessed \(page 19\)](#)]; However, analyses suggest that the current 20% tax rate, including a 6.25% sales tax, 10.75% excise tax, and $\leq 3\%$ local tax, is within the optimal range for revenue and feasibility in Massachusetts. Keeping the current 20% tax rate, the study's forecasted analyses show that annual cannabis sales in Massachusetts have the potential to reach \$1 billion by June 2021 (i.e., July 2020 through June 2021), which will generate annual tax revenue of approximately \$200 million. Any change to the current tax structure is projected to result in marginal tax revenue changes and could cause disruption to the still new and maturing market.

The Massachusetts Cannabis Control Commission ("Commission") recommend that no changes be made to the current taxation rate at this time. However, a re-assessment of tax schemes may be warranted as the market matures in the future. Both the Commission and the Massachusetts Department of Revenue (DOR) defer to the Legislature to determine tax rates. DOR's contributions to this report are limited to evaluation of alternative tax schemes for feasibility of implementation.

I. Tax Study Overview

This legislative report, *Feasibility of Alternative Cannabis Tax Schemes: A Legislative Report & Recommendation for Massachusetts* (“report”), supplemented by study, *Assessment of Alternative Tax Models for Adult-Use Cannabis in Massachusetts* (“study”), has been prepared in response to the enabling legislation, Section 63 of Chapter 55 of the Acts of 2017, to assess feasibility in implementing varying tax schemes by weight, volume, and tetrahydrocannabinol (THC) potency. For these purposes, the Cannabis Control Commission (“Commission”), in collaboration with the Massachusetts Department of Revenue (“DOR”), released a request for proposals to conduct an econometric study of varying cannabis tax schemes. This contract was awarded to KPMG LLP (KPMG), an independent public accounting firm with expertise in both the Massachusetts policy landscape and economic theory and methodologies.

This study’s primary objective was to forecast future cannabis sales and tax revenue under different cannabis tax schemes, which included: two price-based, four weight-based, and two potency-based schemes. This study found that all alternative tax schemes, except for one weight-based tax scheme, are estimated to generate more tax revenue, compared with the current price-based tax of $\leq 20\%$; However, these changes would be relatively small, potentially short-term in nature, and may disrupt the still nascent cannabis industry in Massachusetts.

This report provides the Massachusetts Legislature with an assessment of the feasibility of alternative cannabis tax schemes and concludes with recommendations based on study results. [See KPMG study in Appendix (pages 12-40), *Assessment of Alternative Tax Models for Adult-Use Cannabis in Massachusetts*]

II. Current System

While cannabis is not new, the legal marketplace for adult-use cannabis has only recently emerged in the United States (U.S.). In 2012, Colorado and Washington made history as the first states to legalize adult-use cannabis with Colorado's retail stores opening for business in 2014. Additional states followed suit with a range of heterogeneous policies and regulations. The result has been a legal industry with distinct differences from other industries and between states.

Massachusetts enacted and implemented non-medical adult-use cannabis legalization in 2016 with Question 4, "*Massachusetts Legalization, Regulation and Taxation of Marijuana Initiative.*" The ballot measure outlined a tax scheme at 12%, which would have been the lowest tax rate of all legalized states. In 2017, the Legislature revised the effective rate to 20% where it stands today. There was concern that the proposed excise tax in the original measure was too low, as other legalized states had higher rates at this time [CO (29%), WA (37%), and OR and AK (25%)]. Revisions in Massachusetts included a change in excise tax from 3.75% to 10.75% and local tax from $\leq 2\%$ to $\leq 3\%$. Massachusetts currently has a price-based tax scheme, including a 6.25% sales tax, 10.75% excise tax, and $\leq 3\%$ local tax.

Similar to the heterogeneity inherent in adult-use cannabis policy and regulation, states also implement varying tax designs ("schemes"). [See KPMG study Appendix 4: Adult-Use Cannabis Tax Scheme by State for a comprehensive table of legalized state tax schemes (page 40)]

III. Feasibility

Cannabis tax schemes vary across states with adult-use cannabis legalization. Section 63 of Chapter 55 of the Acts of 2017 requires an assessment of alternative tax schemes, including by weight, volume, and potency. A summary of the schemes is below with feasibility assessments. [See KPMG study Appendix 4: Adult-Use Cannabis Tax Scheme by State for a comprehensive table of legalized cannabis state tax schemes (page 40)]

While the alternative tax schemes assessed may result in changes to sales and tax revenue and would be feasible to implement, none are recommended by the Commission. By maintaining the current 20% price-based tax rate, the study shows that annual cannabis sales in Massachusetts have the potential to reach \$1 billion by June 2021 (i.e., July 2020 through June 2021), which would generate annual tax revenue of approximately \$200 million. A change from the current tax scheme to a weight-based, potency-based, or hybrid model may cause disruptions and costs to the Commonwealth, including but not limited to:

- Increases in the administrative and compliance burden on state tax authorities and taxpayers (e.g., reprogramming of DOR tax systems and retraining of both Commission and DOR staff to implement new file returns from Marijuana Establishments with estimated up-front costs for DOR in a range of \$650,000 to \$1,200,000);
- Restructuring within the Commission, particularly for licensing and enforcement regulations and staffing;
- Increases in the administrative and compliance costs on licensed Marijuana Establishments (MEs) (e.g., to the extent that a new model would require cultivators as well as retailers to file returns, these costs would fall on the cannabis industry for compliance), which could threaten some operations' viability; and
- Encouraging consumers to purchase cannabis from the illicit market(s) if additional taxes were passed onto consumers. This could result in the illicit market(s) continuing to operate with associated risks and costs to public safety, compliance and enforcement agencies, and ultimately, taxpayers.

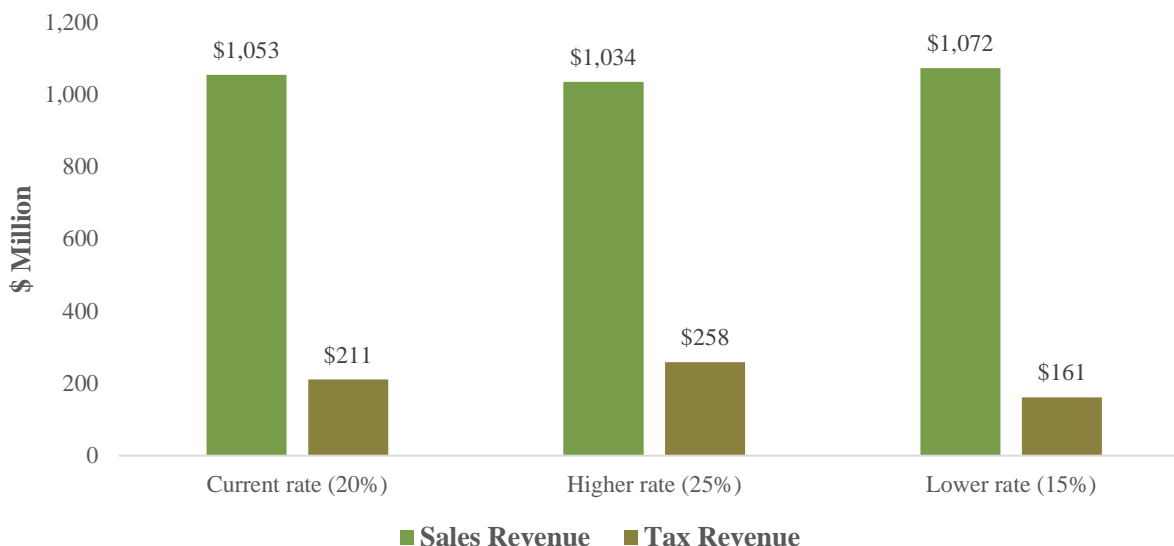
The Massachusetts adult-use cannabis industry is in a nascent stage. A large-scale change in taxation scheme would cause disruptions that are not worth the potential short-term revenue gain, especially in a market with currently stable prices and inelasticity. Indeed, each scheme presents challenges for implementation and regulation, both in industry and government, that may not be worth the marginal gain. The Commission recommends the near-term focus remain on efficiency and market growth with potential for re-evaluation as the market matures.

Price-Based Scheme

i. Price-Based Scheme Results Summary

Massachusetts currently has a price-based tax scheme, including a 6.25% sales tax, 10.75% excise tax, and $\leq 3\%$ local tax. The study projected two alternative price-based tax rates: (1) 15% and (2) 25%. The 15% tax rate will increase sales and decrease tax revenue and conversely, the 25% tax rate would decrease sales and increase tax revenue, albeit only marginally. [See Chart III. A. Price- Based Tax Scheme Projections below and KPMG study for additional information (pages 27-28)]

Chart III. A. Price-Based Tax Scheme Projections



***Note:** This chart was taken from study [Exhibit 6. Projected Annual Cannabis Sales and Tax Revenue by Different Price-Based Tax Rates (Page 28)]

ii. Price-Based Scheme Feasibility Assessment

Price-based tax schemes, as currently implemented in Massachusetts, are most effective in providing efficiency and certainty. These schemes leave less room for error, since all products are taxed the same regardless of product type, weight, and THC levels, allowing for simple tax collection and filing processes.

Results of the study suggest that prices in the current market are stable. An increase to a 25% tax would decrease sales and increase tax revenue marginally. With any increase in the price-based tax structure, the retail tax burden would likely be transferred to consumers, potentially creating a short-term increase in tax revenue (23%) and a potential change to the current price elasticity, resulting in price instability. A higher tax rate may create more elasticity as seen in other states with legal adult-use markets, which may push some consumers to the illicit market. A tax rate change to the current price-based tax scheme could be implemented; However, it *would not* create a significant change in tax revenue, particularly over the long-term. Further, it could

disrupt the industry, causing some consumers to purchase from the illegal market and threaten the viability of licensed Marijuana Establishments.

Weight-Based Scheme

i. Weight-Based Scheme Results Summary

With support from the Commission and DOR, KPMG assessed the current 20% tax rate and four additional weight/price-based hybrid tax schemes. One hybrid tax scheme projected lower tax revenue, while the additional three projected higher tax revenue. [See [Chart III. B. Weight-Based Tax Scheme Projections](#) below and [KPMG study](#) for additional information (pages 28-29)]

Chart III. B. Weight-Based Tax Scheme Projections



***Note:** This chart was taken from KPMG study [Exhibit 7. Projected Annual Cannabis Sales and Tax Revenue by Different Weight-Based Tax Rates (Page 29)]

ii. Weight-Based Scheme Feasibility Assessment

In contrast to a retail-sale tax scheme model, the weight-based method would require cannabis sales and tax returns to be broken down by product type and tax amount per gram. Some states that use this tax model have a different tax rate for flower, trim, seedlings, leaves, and/or seeds. These taxes are imposed on the cultivator, not the retailer. Depending on the model, there may be an additional retail sales tax. Given these differences, training would be necessary to educate administrators about the differences among the taxed products and to educate cultivators on filing proper returns. There may also be complexity in product measurement as cannabis loses weight as it dries after harvest. Systems would need to be put in place to ensure that product is

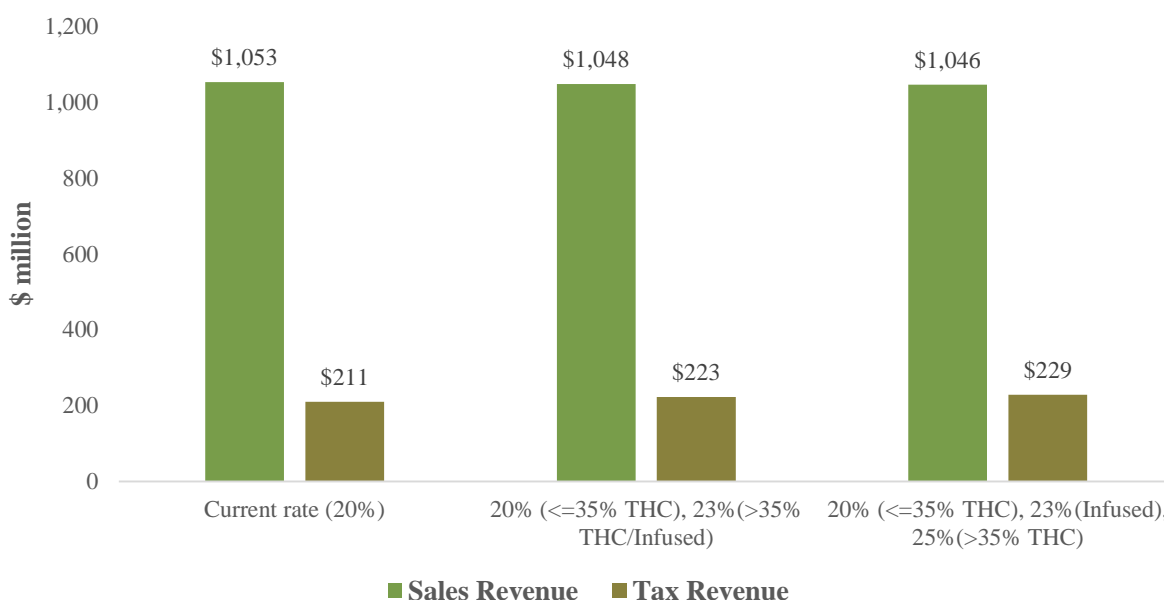
weighed consistently at the proper point in its preparation. This structure may also encourage consumption of higher potency products, adding potential adverse public health and safety effects.

THC (“Potency”)-Based Scheme

i. THC (“Potency”)-Based Scheme Results Summary

Two potency or tetrahydrocannabinol (THC)-based tax schemes were assessed using a higher tax scheme than the current 20% rate, and both projected increases in tax revenue. [See Chart III. C. THC- Based Tax Scheme Projections below and KPMG study for additional information (pages 29-30)]

Chart III. C. THC (“Potency”)- Based Tax Scheme Projections



***Note:** This chart was taken from KPMG study [Exhibit 8. Projected Annual Cannabis Sales and Tax Revenue by Different THC-Based Tax Rates (Page 30)]

ii. THC (“Potency”)-Based Scheme Feasibility Assessment

Similar to price and weight-based tax schemes, a THC (“potency”)-based tax scheme could also be feasibly implemented; However, it would add varying logistical complexities and costs *without* creating a projected significant increase in tax revenue. The potency-based method would require the tax return to be broken down by the THC levels of the cannabis product, with various tax rates applicable to products of different potency. Like the weight-based model, this is a tax imposed on cultivators and product manufacturers, and depending upon the model, an additional retail sales tax may apply. Potency-based taxation would require implementation of systems by cultivators, product manufacturers, and by the Commonwealth to test product to ensure that its potency is correctly stated and that the correct tax rate is applied.

Additionally, in a new industry where the science continues to evolve and with limited testing facilities, implementing a potency-based tax scheme would add to testing costs and require additional laboratory monitoring to ensure consistency across laboratories and products. Further, it could result in a reduction in product availability as producers wait for tests or make lower-potency products to avoid higher taxes. Additionally, this could also affect the medical market and higher potency product availability for medical patients. In a more mature market with additional licensed testing facilities and as the science of cannabis testing and cultivation develops, a potency-based tax structure could have benefits such as product selection among a potency continuum, unlike a weight-based tax scheme, and has the potential for public health harm reduction by incentivizing low THC products (e.g., reduce consumer consumption of higher potency products due to higher cost of purchase). On the other hand, it could turn consumers who seek high-potency cannabis to the illegal market or home growing/manufacturing, which would have a negative effect on tax revenue. At this point, however, changing to a potency-based tax scheme would introduce complexities for both the Commonwealth and the cannabis industry that outweigh the potential benefit.

IV. Conclusion

Looking beyond solely the tax revenue that may be generated by different tax schemes, the Commission and DOR recognize that changing the current tax regime would involve price disruptions, costly complexities in administration and enforcement, and costs to the new cannabis industry. Among the administrative advantages of the current retail sales model: the same tax rate applies to sales of all cannabis products; only cannabis retailers are required to file returns; and the tax return itself is relatively simple. Most importantly, a retail tax by its nature would automatically adjust for the weight and potency of products sold, given that quantity and potency of the cannabis will be reflected in its retail sales price. In essence, in a retail sales model, the task of assessing the weight and potency of a product would fall on the retailers, not the Commonwealth.

In conclusion, any of the assessed tax schemes *could be* implemented in Massachusetts. However, implementing any of the alternative schemes would *not* provide a significant change in tax revenue. Furthermore, change at this point would likely result in disruption to the nascent market and would require significant changes and costs to how the Commonwealth ensures compliance with tax and cannabis regulations. The Commission and DOR defer to Legislature on setting a tax rate.

As the market matures, surrounding states implement adult-use cannabis policies, and other unforeseen changes occur, a re-assessment of tax schemes may be warranted.

V. Recommendation

After a thorough assessment of different cannabis tax schemes included in the study and careful consideration of potential affects, the Commission believes the current 20% tax rate, including a 6.25% sales tax, 10.75% excise tax, and $\leq 3\%$ local tax, is the preferred rate for revenue and feasibility in Massachusetts. However, both the Commission and DOR defer to the Legislature to determine tax rates. The study's analyses indicate that any changes in tax structure would *not* result in a significant change in tax revenue and the implementation of any alternative scheme may cause disruption to the still new and maturing market. The Commission recommends that no changes be made to the current taxation rate and scheme at this time; However, a re-assessment may be warranted as the market matures in the future.

VI. Appendix: KPMG Study, *Assessment of Alternative Tax Models for Adult-Use Cannabis in Massachusetts* (pages 12-40)



Commonwealth of Massachusetts

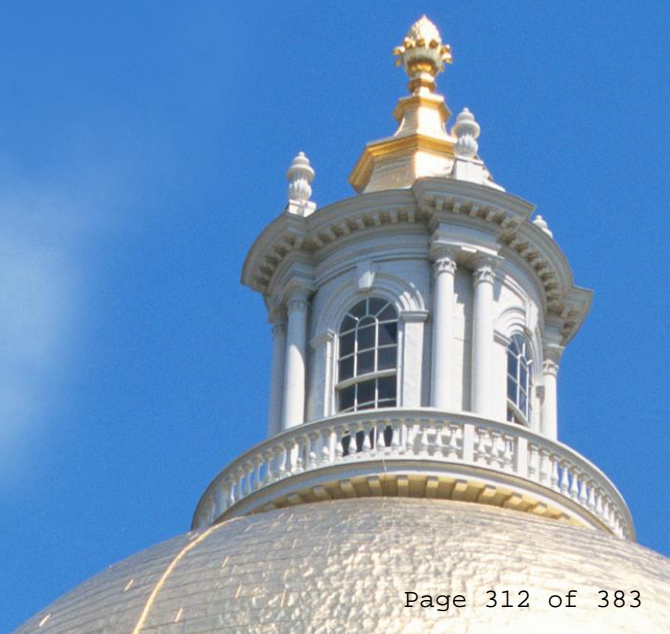
Cannabis Control Commission (CCC)

Assessment of Alternative Tax Models for Adult-Use Cannabis in
Massachusetts

Final Report

June 2020

kpmg.com



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Executive summary

Adult-use cannabis sales have experienced significant growth in Massachusetts since the first sales in November 2018. While Massachusetts currently uses a price-based tax for cannabis sales with a total tax of 20%, other states have experimented with other tax schemes, including based on weight and potency. To assess potential alternative cannabis tax schemes for Massachusetts, as requested by the Cannabis Control Commission (CCC), we conducted two types of analyses.

First, we conducted a regression analysis to project future cannabis sales and tax revenue in the next fiscal year (July 2020 through June 2021) under different alternative tax schemes. Second, based on an environmental scan, we summarized other states' experiences with various tax schemes.

Annual adult-use cannabis sales in Massachusetts have the potential to reach \$1 billion by June 2021 with the current tax rate of 20%, which will generate an annual tax revenue of about \$200 million. The significant growth in cannabis sales and tax revenue is primarily driven by the planned increase in new retail stores in the coming year.

We considered several alternative tax schemes: two price based, four weight based, and two potency based. All alternative tax schemes, except for one weight-based tax scheme, are projected to generate more tax revenue compared with the current price-based tax of 20%. That being said, the changes in tax revenue under the weight-based and potency-based tax schemes are relatively small. Additionally, these changes in tax revenue may be short term in nature. It is unclear whether higher tax revenues from higher tax rates would persist in the long run, especially in a more mature and competitive market in the future. A higher tax rate may also lead to a potential move of consumers from the legal to the black market.

In short, we found that alternative schemes—based on weight or potency—may result in changes in sales and tax revenue. Increasing the current rate may result in slightly higher revenue in the short term but in the long term may lead to a potential move of consumers to the illegal market. The legal cannabis industry in Massachusetts is in an infant stage, and a large-scale change to taxation could cause unpredictable market disruption.

We also assessed the potential advantages and disadvantages of alternative tax schemes qualitatively. A price-based tax is straightforward and has a lower administrative and compliance burden for both state tax authorities and taxpayers. A weight-based tax may be less vulnerable to a price reduction in the long term and could contribute to a more stable tax revenue. A weight-based tax, however, may inadvertently encourage the cultivation and consumption of more potent cannabis products and the associated public health impacts. A potency-based tax, in contrast, may discourage the use of more potent cannabis products.

Furthermore, both potency-based and weight-based taxes may increase the administrative and compliance burden on state tax authorities and taxpayers. Decisions about tax scheme changes require careful consideration of their revenue and nonrevenue impacts.

The results of this study should be interpreted with careful consideration of its assumptions and limitations. Our tax revenue projection may change significantly when any of the critical assumptions change, such as the black-market competition, growth in the number of retail stores, the pass-through rate of the tax burden, and the price elasticity of legal cannabis demand in a more mature market.

Any projection of future tax revenue is inherently uncertain. Our projection is further complicated by the significant uncertainties around the impact of the COVID-19 on the economy and, more specifically, on the legal adult-use cannabis market in Massachusetts. Additionally, due to the relatively short history of adult-use cannabis sales and alternative cannabis tax schemes, evidence about the potential advantages and disadvantages of alternative tax schemes from the environmental scan may be based on anecdotal experience instead of empirical studies.

All estimates developed in this study are based on data supplied by CCC and from public sources. All alternative tax schemes, including tax rates, are based on the specifications of the existing alternative tax schemes in other states, supplemented by inputs from the CCC. The potential advantages and disadvantages summarized in this study are based on public sources. KPMG has not designed or provided any inputs to the alternative tax schemes considered in this study and has not hypothesized or tested any advantages and disadvantages of alternative tax schemes. In doing so, KPMG does not make recommendations regarding the feasibility of implementing alternative tax schemes.

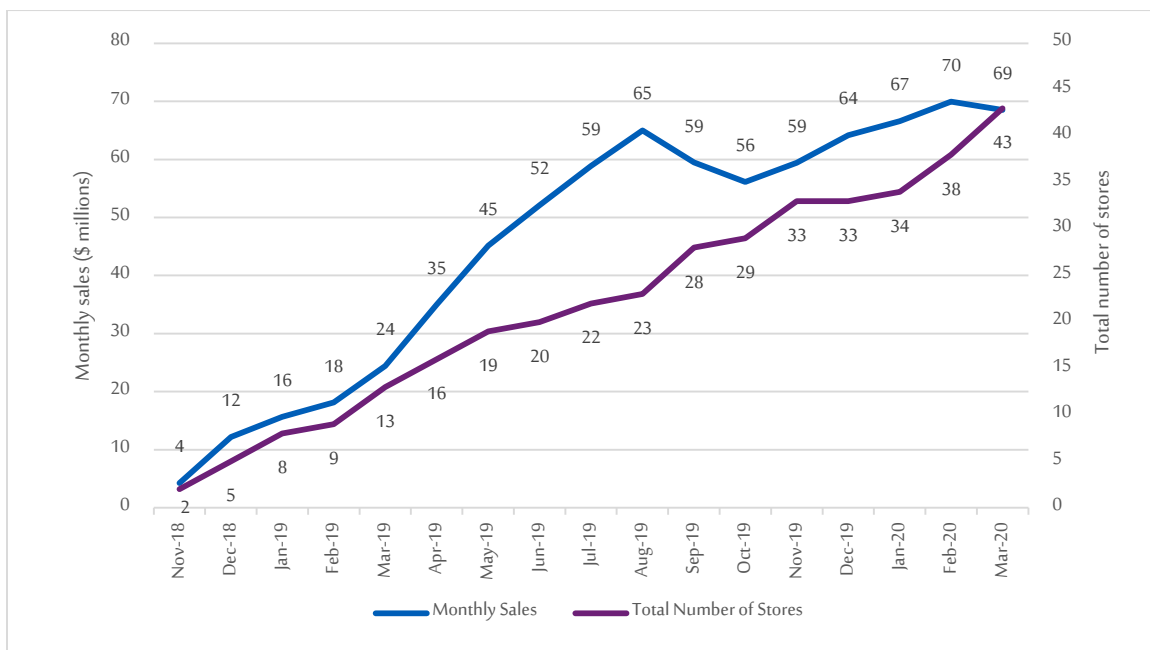
CCC should consider undertaking additional analyses to understand the potentially changing impacts of alternative tax schemes. First, the cannabis sales and tax revenue forecast model will require periodic re-estimation to reflect changing market and consumer behavior in a more mature market, especially in a post-COVID “regime.” How consumers respond to price and tax changes may evolve, which may affect the forecast of cannabis sales and tax revenues.

Second, an economic impact analysis can provide a more comprehensive understanding of the economic benefits of the adult-use cannabis market in Massachusetts. The economic benefits include not only cannabis tax revenues but also the job creation and contribution to the gross state product. An economic impact analysis can also help CCC estimate the additional tax revenues from industries in the cannabis supply chain that benefit from the legal cannabis market.

1. Introduction

Massachusetts was the first state on the East Coast to legalize the recreational sale of cannabis to adults. In November 2016, 53.6% of state residents voted “yes” on Question 4, the Massachusetts Legalization, Regulation, and Taxation of Marijuana Initiative. The first recreational sale of cannabis in the Commonwealth took place in November 2018, when two retail stores opened. In the following 16 months, a total of 43 recreational cannabis retailers began selling marijuana to adult consumers. Except for the period covering the vaping ban¹ and the mandatory store closures to contain COVID-19,² Massachusetts has seen steady growth in adult-use cannabis sales revenues since 2018, with monthly sales reaching about \$70 million in March 2020 (see Exhibit 1).

Exhibit 1. Growth in adult-use cannabis sales and retail stores in Massachusetts



Massachusetts applies a 20% tax on the retail sale of adult-use cannabis products, including a 6.25% state sales tax, a 10.75% excise tax, and a local cannabis tax of up to 3%. Nine other states also have a

¹ As a result of health concerns surrounding vaping products, a ban was enacted in Massachusetts for all vaping products in September 2019; it was lifted in December 2019.

² On March 24, 2020, to contain the spread of COVID-19, Massachusetts implemented a shutdown of nonessential businesses, which included recreational cannabis dispensaries. The shutdown was lifted in part on May 25, 2020 when curbside pickup of recreational cannabis was permitted. At the time of this study, the effect of COVID-19 on the cannabis industry (and the economy more generally) is unclear.

legal adult-use cannabis market. While a price-based tax on retail sales is the most common cannabis tax scheme, several states have experimented with alternative tax schemes, including weight-based and potency-based taxes. The impact of these alternative tax schemes on cannabis sales and tax revenue and nonrevenue outcomes (e.g., administrative and compliance costs and public health outcomes) is not well understood due to a lack of data and a relatively short history of adult-use cannabis sales in the United States.

This study aims to assess alternative cannabis tax schemes in Massachusetts. To this end, we conducted two analyses. First, we forecasted the future adult-use cannabis sales and tax revenue under the current cannabis tax structure in Massachusetts and under several alternative tax schemes experimented in other states. Second, we conducted an environmental scan to summarize other states' experiences when experimenting with alternative tax schemes. This analysis helps assess the nonrevenue outcomes associated with alternative tax schemes.

The adult-use cannabis market and alternative cannabis tax schemes are still recent phenomena. Thus, there is a lack of high-quality data and consistent empirical evidence to understand the full impacts of alternative tax schemes on the adult-use cannabis market. This study uses available information at the time of the analysis, and our results should be interpreted with careful consideration of our assumptions and limitations. As with any forecast study, any change in the key assumptions could impact the forecast considerably.

The rest of this report is structured as follows. We first provide a brief description of the alternative tax schemes considered in this study. Next, we describe the data sources and method to forecast future cannabis sales and tax revenue under the different tax schemes. We next present the findings of the study, including a list of study limitations, and conclude with a high-level summary of the results.

Alternative tax schemes

The primary objective of this study is to forecast future cannabis sales and tax revenue under different cannabis tax schemes. The baseline is the current cannabis tax structure in Massachusetts, which is a price-based tax with a total tax rate of 20%, including sales tax, excise tax, and local cannabis tax. The retailer collects these taxes at the time of the final sale. For this study, we estimate the impact of two alternative price-based rates (25% and 15%) on sales and tax revenue, based on input from the CCC.

Three states currently have a weight-based tax scheme for their legal adult-use cannabis market: Alaska, California, and Maine. Since Alaska does not levy a sales tax, we focus on the weight-based models from California and Maine, which are both essentially hybrid tax schemes that include both weight-based and price-based taxes. A hybrid weight-based scheme first taxes the cultivator's sales to the manufacturer, distributor, or retailer based on a fixed per-weight basis of the cured flower. This tax is then combined with a tax on the final sales to consumers as a percentage of the price.

California has a retail cannabis tax similar to Massachusetts; it ranges from 22.25% to 25.5%, depending on the local sales tax. A weight-based tax of \$9.65 per ounce of flowers, \$2.87 per ounce of cannabis leaves, and \$1.35 per ounce of fresh plant material is levied on California cultivators' sales. Both retail and cultivator taxes are collected by a distributor, who functions as a middle-man between the cultivator, manufacturer, and retailer. The distributor then submits the taxes collected to the tax authority. Maine follows a similar approach to California. The total retail tax for the sale of Maine cannabis is 15.5%, and the tax per ounce of the flower is \$20.94. Maine also taxes trim at \$5.86 per

ounce, seedlings at \$1.5 each, and seeds at \$0.30 each. At the time of this study, no sales of adult-use cannabis have been recorded in Maine because COVID-19 delayed its first store opening scheduled for 2020.

Illinois is the only state to have a potency-based tax scheme. It taxes cannabis based on delta-9-tetrahydrocannabinol (THC) levels. Lower THC products (those with 35% THC or less) are taxed at 10%, infused products at 20%, and products with more than 35% THC at 25%. State and local taxes in Illinois do not account for potency and are the same as taxes on other retail goods. The Illinois sales tax is 6.25%, and the local sales tax ranges between 0 and 4.75%. Illinois also taxes cultivator sales at a rate of 7% based on wholesale prices, not weight. Illinois also allows localities to tax cannabis at up to 3% of sales price. Thus, once the local cannabis taxes are included, the total cannabis tax in Illinois is between 16.25% and 39% at retail, with 7% at wholesale. In the first month of legal adult-use sale (January 2020), Illinois collected nearly \$10.5 million in taxes, exceeding the initial estimate.³

By using the tax schemes and rates from California, Maine, and Illinois, along with inputs from the CCC, we estimate the impact of these eight tax schemes:

- *Price-based* tax at 15% and 25% rates
- *Weight-based* tax based on California and Maine weight-based tax amounts with the following rates:⁴
 - \$9.65 per ounce weight-based tax and 17% price-based tax
 - \$9.65 per ounce weight-based tax and 20% price-based tax
 - \$20.94 per ounce weight-based tax and 17% price-based tax
 - \$20.94 per ounce weight-based tax and 20% price-based tax
- *Potency-based* tax based on Illinois's THC thresholds with the following rates:
 - 20% price-based tax for $\leq 35\%$ THC, 23% price-based tax for $>35\%$ THC and infused products
 - 20% price-based tax for $\leq 35\%$ THC, 25% price-based tax for $>35\%$ THC, and 23% price-based tax for infused products

³ Legal Marijuana Sales Created \$10.5 Million in Illinois Tax Revenue in January. CBS Chicago. Available at <https://chicago.cbslocal.com/2020/02/24/illinois-recreational-marijuana-revenue-legal-weed-cannabis-sales/>, retrieved on June 6, 2020.

⁴ We used the projected sales quantity and associated product weights from the retail transactions to estimate the tax revenue under the weight-based schemes. See Appendix 1.

2. Data and approaches

Data sources

To forecast future adult-use cannabis sales and tax revenue, we used data obtained from CCC and public sources. Exhibit 2 summarizes the data sources and how these data are used in our analysis. The primary data used in this study are the store sales transactions and store openings data provided by the CCC from the Metrc and Socrata databases.

Exhibit 2: Study data sources

Data	Data Use	Source
Daily adult-use sales data by granular product type from November 2018 to March 2020	Calculate adult-use cannabis sales (revenue, weights, units) and obtain prices in Massachusetts	CCC/Metrc database
Adult-use license application (dates for application, provisional license, and final license; information to identify expedited applicants)	Estimate the future number of new retail stores	CCC/Socrata database
Black-market prices from November 2018 through March 2020 ⁵	Quantify the impact of the black-market prices on legal market sales	Price of Weed and Budzu

We also used black-market data for the state of Massachusetts in the analysis. The black-market prices were pulled from two websites: Budzu⁶ and Price of Weed,⁷ using the Internet Archive Wayback Machine.⁸ Data were pulled for the period corresponding with the Metrc data: November 2018 through March 2020.

In addition to these data sources, we leveraged the experience from the Massachusetts Department of Revenue (DOR) and the Massachusetts Gaming Commission. The DOR provided valuable inputs on its high-level projection for cannabis revenues in Massachusetts. The Gaming Commission shared lessons

⁵ Prices for one ounce or greater were removed from the analysis due to bulk discounting that is not comparable with the legal market. Prices were normalized to one gram for consistency with Metrc data conversions. While data are available by city in Massachusetts through the websites, data points are limited. Therefore, while area-specific data would have been a useful addition, the black-market data were sparse. As a result, statewide data were aggregated on a monthly basis from the two sources.

⁶ <http://budzu.com/prices/usa/massachusetts>

⁷ <http://www.priceofweed.com/prices/United-States/Massachusetts.html>

⁸ <http://archive.org/web/web.php>

learned from its experience with the gaming revenue forecast. These inputs have been considered throughout the study.

Approach

In this section, we describe the methodology used to forecast cannabis sales under different tax schemes and an alternative scenario of cannabis price decline. We started with a regression-based econometric model that estimates the relationship between cannabis sales and several independent (predictive) variables. We then generated the future value of the independent variables and used the regression coefficients to estimate future cannabis sales.

Econometric model

We used a multiple variable regression model to estimate the empirical relationship between the dependent variable (i.e., cannabis sales) and independent variables (e.g., cannabis price) using historical data. Forecasts of future cannabis sales can be generated by applying the same empirical relationship to the future values of the independent variables. Specifically, we used an ordinary least square (OLS) regression model, with the log-transformed cannabis sales (quantity sold) as the dependent variable.⁹ The independent variables in the regression model include:

- Adult-use cannabis price (log-transformed)
- Black-market cannabis price (log-transformed)
- Product group indicators (i.e., raw cannabis, infused products, and concentrates)¹⁰
- Number of operating licensed adult-use retailers in operation
- Store age (number of months in operation) and its squared term
- Vape ban indicator (September–December 2019) (interacted with product group indicators)
- Indicators for each retail store.

We estimated this regression model using daily sales data by cannabis product group for each store from the inception of adult-use sales in November 2018 to March 2020. Both the dependent variable (cannabis sales) and the price variables in the regression were log-transformed so that the coefficients of the price variables can be interpreted as the price elasticities of demand for cannabis. The price elasticity of demand is a measure of how much consumer demand changes in response to a price change. That is, it is a measure of how sensitive consumers are to changes in the price. For example, a price elasticity of demand of -0.5 indicates that for a 1 percent increase in the price of cannabis, there is a 0.5 percent decrease in demand.

⁹ To estimate tax revenue under the weight-based and THC-based tax schemes, we converted the projected quantity sold into grams and THC levels using the method described in Appendix 1, Weight and Potency Conversion.

¹⁰ We grouped granular product categories from the Metrc system into three major product groups: concentrate, infused, and raw cannabis. Concentrate products include concentrate, concentrate (each), kief, and vape product. Infused products include infused (edible), infused (nonedible), infused pre-rolls, and suppository. Raw cannabis includes buds, raw pre-rolls, shake/trim, and shake/trim (by strain).

Product group indicators control for group-specific effects, such as the variation in product preferences over time. The number of retailers controls for product availability and market competition. Store operation history may affect cannabis sales, and thus the number of months a store has been in operation was included in the regression, with a squared term to control for the quadratic effect. In this way, we can estimate both the impact of operational history on sales and how this impact changes over time.

Massachusetts declared a public health emergency related to vaping in September 2019 and issued a four-month ban on all vaping products. An indicator for the four months was included in the regression to control for the sales decline associated with this temporary ban. Finally, we included indicators for each retail store control for the unobserved, store-specific effects that do not vary over time. The retail store indicators capture the unique location, ownership, and operational characteristics of each store, along with other unobserved effects.

We considered additional independent variables, including socioeconomic and demographic variables, such as the percent of the population in the labor force, the unemployment rate, percent of the population that is male, and household income. However, we decided not to include these independent variables in the regression analysis due to their infrequent data refresh (e.g., quarterly and annually), which leads to a lack of variability in these variables.

Appendix 2 presents the coefficients of the regression model. As expected, adult-use cannabis sales decrease as the legal cannabis price increases. Specifically, a 1 percent increase in the legal cannabis price was associated with a 0.44 percent decrease in adult-use cannabis sales. This result indicates that the demand for cannabis in the current market in Massachusetts is inelastic; that is, the demand does not change as much as the price. On the other hand, adult-use cannabis sales increase as the black-market price increases, which suggests that price increases in the black market may push some consumers to the legal market (i.e., a substitution effect) and vice versa. Adult-use cannabis sales also increase with the length of time stores have been in operation, although at a decreasing rate. As a whole, changes in the explanatory variables explain 91% of the variations in adult-use cannabis sales.

Projection of future values of independent variables

The econometric model estimates how adult-use cannabis sales adjust with changes in the values of the independent variables. Before we can forecast adult-use cannabis sales in our forecast period, July 2020 through June 2021, we need first to project the future values of the independent variables. The key variables to the forecast are future cannabis prices (in both legal and black markets) and the future number of retail stores. To assess the impact of future uncertainties, we projected the future values of independent variables under two scenarios: the main scenario and an alternative scenario with a retail price drop. The sections below describe the projections under the main and price drop scenarios.

Cannabis price

A descriptive analysis shows that both legal adult-use and black-market cannabis prices were relatively stable over time in Massachusetts. We projected the future legal adult-use price using a three-month moving average (i.e., the current month's price is the average price of the previous three months). We used a six-month moving average to project the future black-market price since we do not have as many data points on the black-market price as in the legal market.

Number of new retail stores

Using the historical data on adult-use retail license applications, we conducted a survival analysis to estimate: (1) the percent of applicants that eventually open a new store and (2) the median duration between application or provisional license approval and store opening. Since Massachusetts provides expedited application reviews to applicants with a disadvantaged background, we conducted a separate analysis for expedited and nonexpedited applicants.¹¹ Exhibit 3 shows the duration between retail license application and store opening for each cohort. Using these estimates, we projected that a total of 55 new stores would open during our forecast period of July 2020 through June 2021.

Exhibit 3: Estimated duration between retail license application and store opening

Cohort	% of Applicants that Open a New Store		Median Duration to Store Opening (days)	
	Application Submission	Provisional License	Application Submission	Provisional License
Expedited Applicants	44.6%	50.0%	297	162
Nonexpedited Applicants	10.9%	14.3%	406	241

Permanent store closure due to COVID-19

The COVID-19 in 2020 caused many businesses in Massachusetts and throughout the country to close. In Massachusetts, from March 24 through May 25, adult-use cannabis retailers closed, as did other businesses considered nonessential and were then allowed to open for curbside order pickup. All adult-use cannabis retail stores that were operating before the COVID-19 reopened in May 2020. We assumed no permanent cannabis retail store closure in Massachusetts during our projection period of July 2020 to June 2021.

Alternative scenario – price drop

We also projected the future value of independent variables under an alternative price drop scenario.¹² In this scenario, we assumed the same three-month moving average for the future legal adult-use retail price through November 2020, and the price will then decrease by 20% starting in December 2020 (the start of the third year of the legal adult-use sale) through June 2021.¹³

¹¹ The following types of retail license applicants receive an expedited application review: (1) eligible for the Economic Empowerment Priority review, (2) eligible for the Social Equity Programs, (3) have a Disadvantaged Business Enterprise status, and (4) have an existing medical use facility.

¹² The sales and tax revenue under the alternative price drop scenario was projected using the current 20% tax rate. The alternative price drop scenario was not used to project sales and tax revenue under the alternative tax schemes.

¹³ Although there is no consistent evidence that retail cannabis prices decrease significantly in new legal cannabis markets, an Oregon study suggests that retail prices could decrease by 10-20% in a year. We used a 20% price decrease as a conservative estimate. Source: Josh Lehner. February 8, 2018. Marijuana: Falling Prices and Retailer Saturation? Oregon Office of Economic Analysis. Available at <https://oregoneconomicanalysis.com/2018/02/08/marijuana-falling-prices-and-retailer-saturation/>, retrieved June 7, 2020.

Projected future cannabis tax revenue by tax scheme

To assess the impact of tax schemes on cannabis tax revenue, we first forecasted the total annual cannabis sales revenue. The projection uses the main scenario described above, with the current price-based tax rate of 20%. We then estimated the cannabis sales revenue from other tax schemes, including price-based taxes at different rates as well as weight-based and THC-based taxes, using the following approach:

1. Assume that any change in tax burden under the alternative tax schemes is 100% passed through to consumers. For example, if the tax rate is increased by 5 percentage points, consumers will pay the entire additional 5% tax. This approach is consistent with the State of Washington experience, where the legal cannabis industry has high market power and was able to pass through additional costs to the consumers.¹⁴
2. Estimate the impact of a change in the tax burden on cannabis sales by applying the additional costs to the consumer by the estimated price elasticity of demand (-0.44), assuming everything else remains the same. The price elasticity is the relationship between the change in price (in this case, caused by the tax change) and the change in demand. For example, if the taxes increase by 5%, some customers will purchase less, as some are no longer willing to buy the product. The price elasticity determines whether the demand decreases by less than 5%, 5%, or more than 5%.
3. Assume that increases in the legal adult-use cannabis taxes do not lead to consumers switching to the black market. We were unable to estimate the potential demand movement between the legal and black markets due to a lack of sales data for the black market.

Data and approach limitations

It is critically important to interpret the study results in light of several significant limitations:

- The number of new retail stores is the primary driver of growth in our projected future sales and tax revenue. The projected tax revenue will be impacted significantly if the number of new retail stores either falls short or exceeds our expectation, which is possible with any change in licensing policies or practices.
- The impact of alternative tax schemes on sales and tax revenue was calculated through the price elasticity of demand. The impact of alternative tax schemes on sales and tax revenue could change significantly if the price elasticity changes.
- Sales and tax revenue estimates assume a constant price elasticity of demand at different tax rates. This might not be true since the elasticity is a local measure that may not work well to estimate sales and tax revenue changes associated with a large change in the tax rate or price.
- Sales and tax revenue estimates do not take into account competition from the black market due to a lack of black-market demand data in Massachusetts. If the black market in

¹⁴ Hollenbeck B, Uetake K. October 2018. Taxation and Market Power in the Legal Marijuana Industry. UCLA Working Paper.

Massachusetts continues to flourish as it did in California, our projection could overestimate future sales and tax revenue.

- Sales and tax revenue estimates assume that retailers can pass all additional tax burden to the consumer, which is reasonable in a market where retailers have high market power. The ability of retailers to pass costs onto consumers may change in the future, especially if the market becomes more competitive.
- The impact of COVID-19 on the economy is mostly unknown. The sales and tax revenue estimates may be different if the economic impact of COVID-19 is more or less severe than expected.
- Although the qualitative experiences from other states provide useful insights, it is important to recognize that some of these experiences may reflect the unique markets in those states. Also, legal adult-use cannabis is still a relatively new phenomenon with limited data and history. It is unclear whether these early experiences will persist in the long term.

3. Findings

This section presents the findings of our study. We first show the impact of alternative cannabis tax schemes on future cannabis tax revenue in the next fiscal year. Next, we provide a summary of other states' experiences with alternative cannabis tax schemes.

Impact of alternative tax schemes on cannabis tax revenue

Exhibit 4 shows that the monthly cannabis sales projected by our regression model are close to the actual sales for January 2019¹⁵ through March 2020. It also shows the forecasted monthly sales revenue from July 2020 through June 2021,¹⁶ under both the main scenario and alternative price drop scenario in which prices drop by 20% starting in December 2020.

Exhibit 4. Actual and estimated monthly cannabis sales

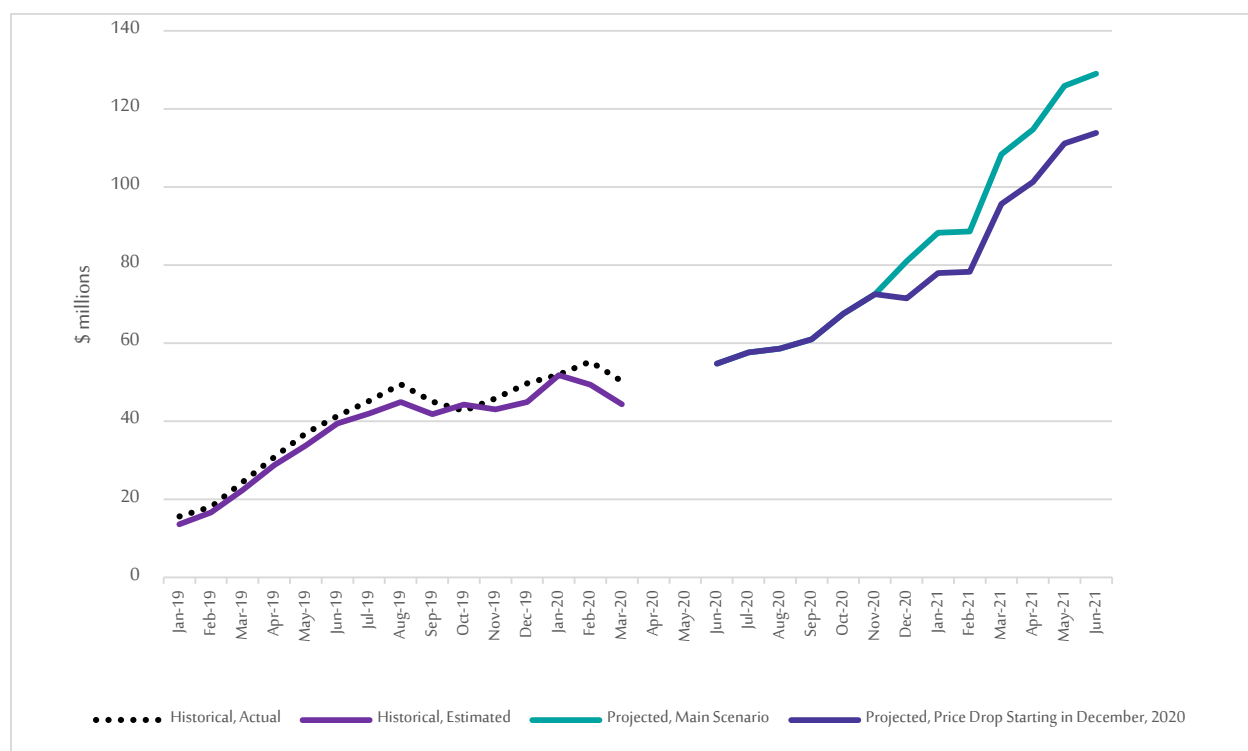


Exhibit 5 shows the projected annual cannabis sales from July 2020 through June 2021 under different price scenarios. Under the main scenario, annual cannabis sales are expected to reach \$1,053 million, with an estimated cannabis tax revenue of \$211 million under the current tax structure. This represents a 94% increase in both cannabis sales revenue and tax from the 12 months of April 2019 through March 2020. This growth in both sales and tax revenue is driven primarily by the number of new retail stores projected to open next year.

¹⁵ The first two months of legal adult-use cannabis sales, November and December 2018, are not shown since early months of sales could be different from subsequent months when the sales become more stable. Actual and estimated sales from April 2020 through June 2020 are not included due to the closure of cannabis stores related to COVID-19.

A scenario where there is a 20% retail price drop starting in the third year of legal adult-use sale (an alternative scenario with the same 20% tax rate) leads to lower cannabis sales (\$967 million) and lower tax revenue (\$193 million).

Exhibit 5. Projected annual cannabis sales and tax revenue under current tax structure (for the year starting on July 1, 2020)

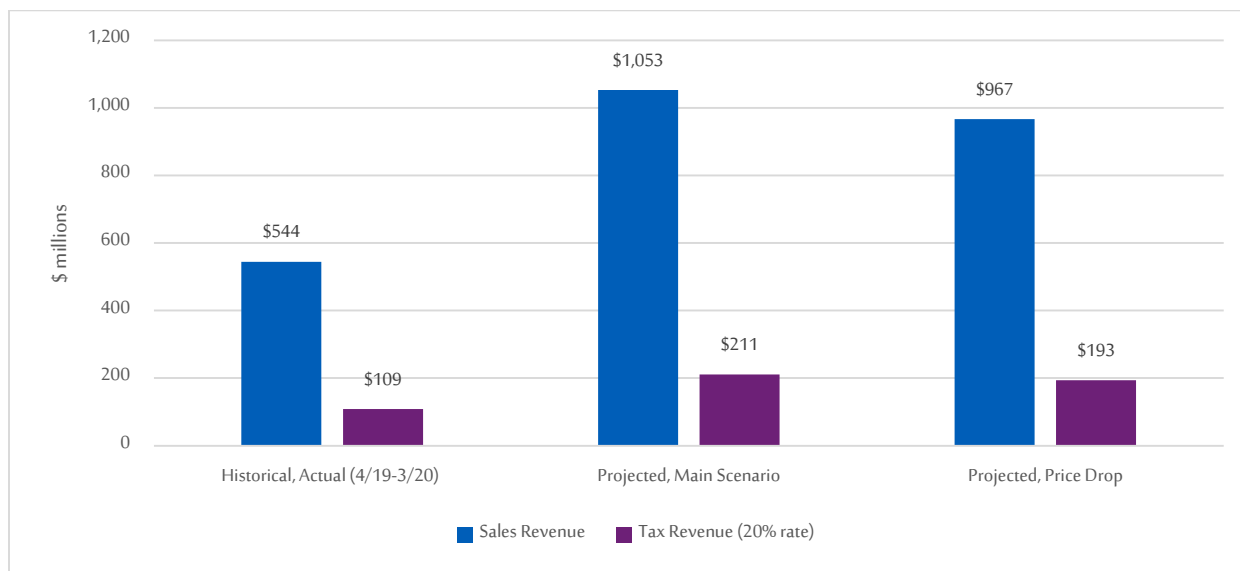


Exhibit 6 shows a comparison of projected annual sales and tax revenue with different tax rates under a price-based scheme. Compared with the current rate of 20%, an increase to 25% will reduce sales slightly to \$1,034 million (a 1.8% decrease) but increase the tax revenue to \$258 million (a 23% increase). In contrast, a reduction of the tax rate to 15% will increase sales by 1.8% and decrease the tax revenue by 23%. These effects are driven by the current inelastic legal adult-use demand in Massachusetts. Since demand does not adjust by as much as the tax rate change, the tax revenue will increase with a higher tax rate even though the demand will decline. It is worth noting that a higher tax rate may lead to lower tax revenue in the future if cannabis demand becomes elastic in Massachusetts.

Exhibit 6. Projected annual cannabis sales and tax revenue by different price-based tax rates (for the year starting on July 1, 2020)

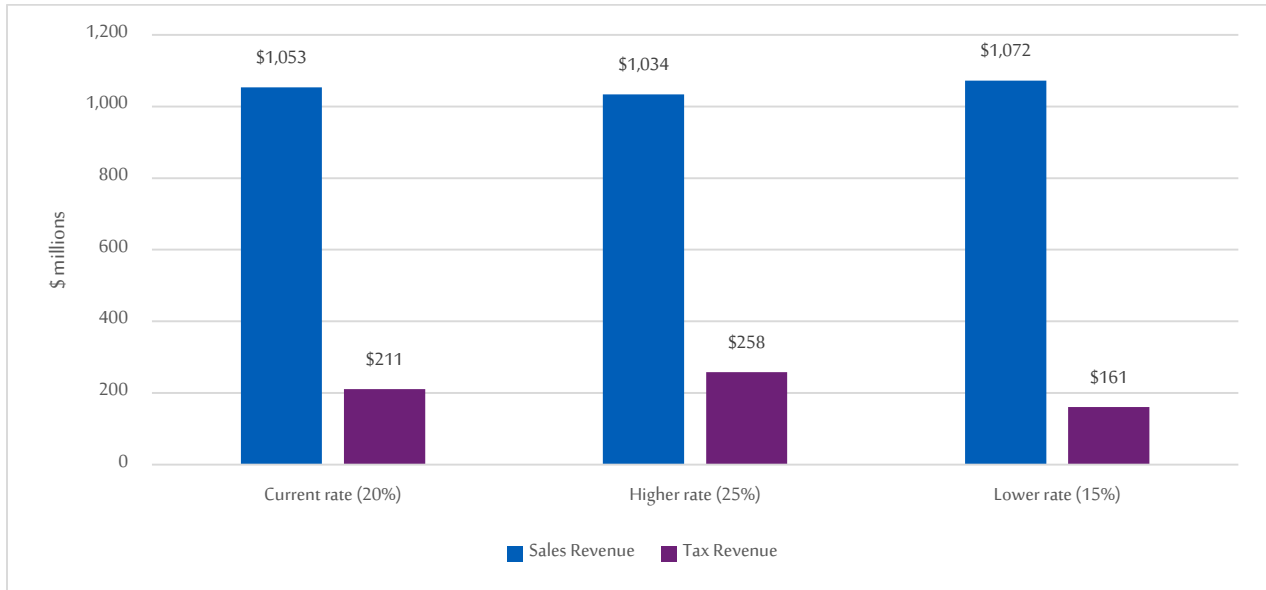


Exhibit 7 shows the estimated impact of weight-based tax schemes on projected tax revenues. Among the four weight-based tax schemes under consideration, only the first one, with a 34-cent per gram weight-based tax and a 17% price-based tax, is expected to have a combined tax rate lower than the current 20% rate. The other three weight-based tax schemes are expected to have a combined tax rate higher than the current 20% rate. With an inelastic demand, the projected tax revenue is lower under the first weight-based tax scheme than the current cannabis tax scheme. The projected tax revenue is higher under the other three weight-based tax schemes relative to the existing cannabis tax structure. A weight-based tax scheme with a 74-cent per gram weight-based tax and a 20% price-based tax produces the highest tax revenue among the four weight-based tax schemes.

Exhibit 7. Projected annual cannabis sales and tax revenue by different weight-based tax rates (for the year starting on July 1, 2020)

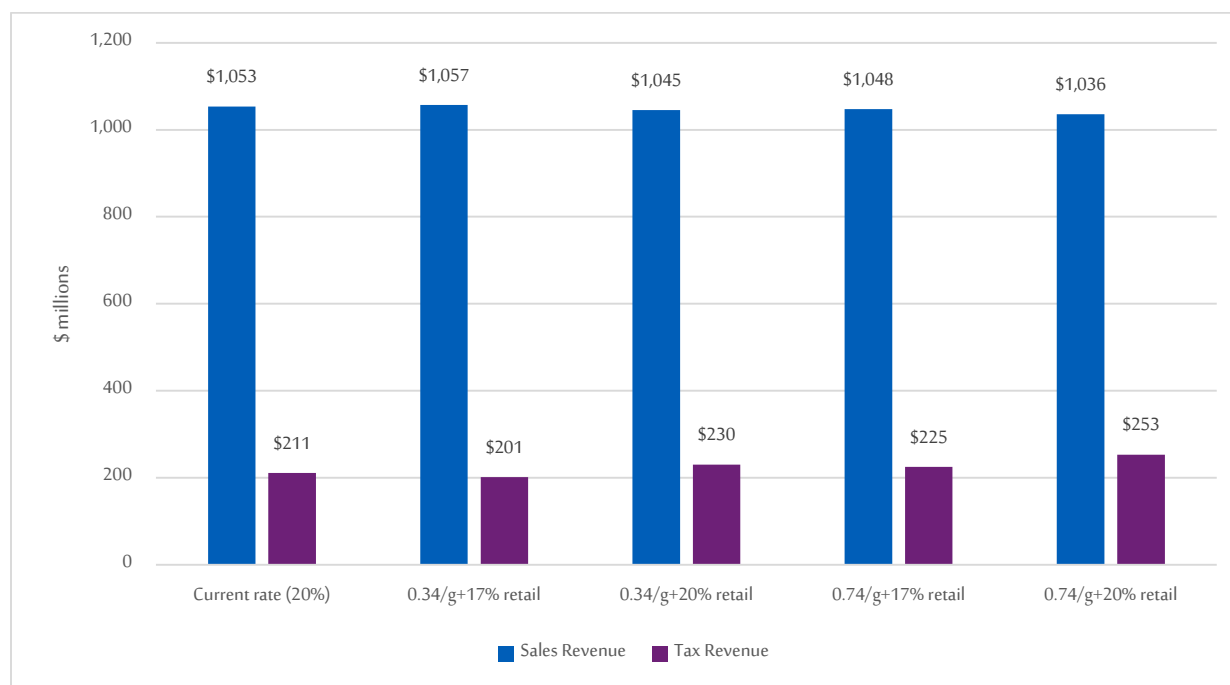
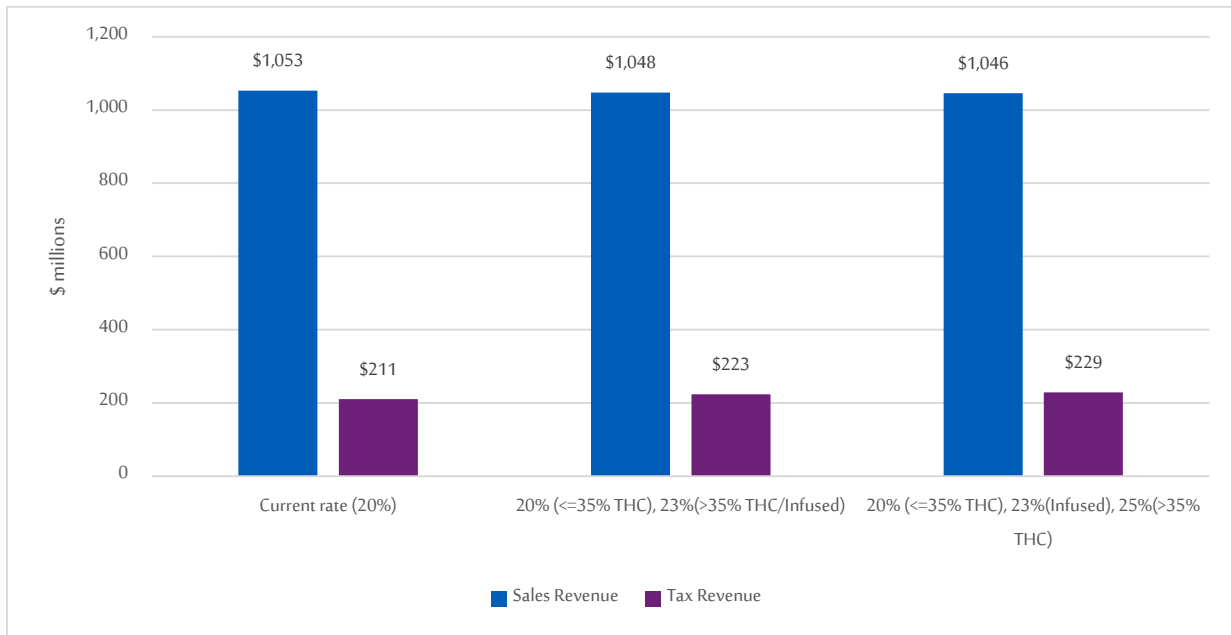


Exhibit 8 shows the estimated impact of potency-based tax schemes on projected tax revenues. Both THC-based tax schemes use a higher tax rate than the current 20% rate. Thus, both THC-based tax schemes are estimated to generate a higher tax revenue than the existing tax structure, given the current inelastic demand.

Across all the alternative tax schemes under consideration, a price-based tax rate at 25% is estimated to generate the highest tax revenue, with a tax revenue 23% higher than the current tax of 20%. All weight-based and potency-based schemes considered in this study result in relatively small changes in sales and tax revenue. Our estimates reflect the short-term change in sales and tax revenues under alternative tax schemes. The long-term changes remain uncertain, especially in a more mature market in the future. A higher tax rate may also lead to a potential move of consumers from the legal to the black market.

Exhibit 8. Projected annual cannabis sales and tax revenue by different THC-based tax rates (for the year starting on July 1, 2020)



As we have emphasized throughout this section, our projected tax revenue under alternative tax schemes relies on the current inelastic legal adult-use demand in Massachusetts. In a new market with a few retail stores, consumers may not be as sensitive to price changes. In a mature market with more stores and choices, a more elastic demand for adult-use cannabis is possible. For example, a recent study using three years (2014–2017) of adult-use cannabis sales data from the State of Washington estimated the price elasticity of cannabis sales at between -2.5 to -2.9, with 385 retailers in 2017.¹⁷

Appendix 3 shows the cannabis tax revenue estimates for a wide range of tax rates and price elasticities of demand.¹⁸ Under each price elasticity, the estimated tax revenue at each tax rate is expressed as a percent of the tax revenue at a 20% rate. For example, with a price elasticity of -0.44, the estimated tax revenue at a 25% tax rate is 23% higher than that at a 20% tax rate. The table also shows that with an inelastic demand (e.g., -0.44), a higher tax rate generates a higher tax revenue. When the demand becomes more elastic, a higher tax rate only leads to a higher tax revenue up to a certain tax rate, beyond which the tax revenue is estimated to decrease.

The numbers in Appendix 3 are estimated solely to demonstrate the potential impact of tax rates on tax revenue when the market becomes more elastic. The numbers should be interpreted with caution. Specifically, this table assumes a constant demand and consumer response to tax rate changes. In reality, market and consumer responses may change along with the tax rate changes. However, we do not have data to fully estimate the market and consumer responses in Massachusetts. Additionally, this

¹⁷ Hollenbeck B, Uetake K. October 2018. Taxation and Market Power in the Legal Marijuana Industry. UCLA Working Paper.

¹⁸ This analysis also assumes retailers pass through 100% of the additional tax burden to consumers across all price elasticity estimates.

table is likely to reflect short-term effects. It is uncertain whether these effects will persist in the long run, especially when the market becomes more mature and more competitive.

Other states' experience with alternative cannabis tax schemes

Nine other states have passed laws to allow adult-use cannabis sales. Appendix 4 provides a summary of the current cannabis tax structure in these states. While no two states have identical tax structures, five of the nine states have implemented a price-based tax scheme, making it the most common cannabis tax scheme. The popularity of a price-based tax scheme may be related to its ease of administration and enforcement. For example, a recent report from the California Legislative Analyst's Office noted that the state has an existing administrative structure for auditing and enforcing price-based tax payment, thus making it easier to enforce compliance.¹⁹ California does not require additional information from adult-use businesses, such as product weight and potency, which makes taxpayer compliance easier.²⁰

Three states have a weight-based tax scheme for adult-use cannabis sales: Alaska, California, and Maine. Alaska taxes cannabis cultivators based on product weight with no additional retail-based tax. California and Maine (scheduled to start in 2020) have a hybrid tax scheme that combines a weight-based tax on cultivators and a price-based retail tax. A weight-based tax scheme could be less vulnerable to revenue loss due to a cannabis price reduction.²¹ In other words, a weight-based tax scheme has the potential to generate cannabis tax revenue that is more stable than the price-based tax scheme.

However, a weight-based tax could incentivize the cultivation²² and consumption²³ of higher THC cannabis when cannabis products with the same weight but different potency are taxed at the same rate. Additionally, a weight-based tax scheme may increase administration and compliance burden. This is because state tax authorities may lack expertise in the weight of cannabis products, and states may not have a mechanism for consistent third-party verification of the weight of harvested plants.²⁴

Illinois is the only state that has a potency-based tax scheme, with a first legal adult-use sale in January 2020. Under a potency-based tax scheme, a higher tax rate is applied for higher potency cannabis products. A potency-based tax thus has the potential to discourage the harmful use of high-potency products, resulting in potential public health benefits.²⁵ Similar to a weight-based tax scheme, a potency-based tax scheme may also increase administration and compliance burden.

¹⁹ Petek G. December 2019. How High? Adjusting California's Cannabis Taxes. California Legislative Analyst's Office.

²⁰ *Ibid.*

²¹ Davis C, Hill ME, Philips R. January 2019. Taxing Cannabis. Institute on Taxation and Economic Policy.

²² *Ibid.*

²³ Opinion: There is a Better Way to Tax Legal Cannabis. April 12, 2019. Leafly. Available at <https://www.leafly.com/news/industry/opinion-theres-a-better-way-to-tax-legal-cannabis>, retrieved on June 6, 2020.

²⁴ Petek G. December 2019. How High? Adjusting California's Cannabis Taxes. California Legislative Analyst's Office.

²⁵ *Ibid.*

However, the cannabis industry has voiced the concern that, in addition to regulatory burden, it is difficult to measure the THC content accurately, which is critical for a potency-based tax.²⁶ Given a choice between a weight-based tax and a potency-based tax, the cannabis industry in Canada preferred the latter. The main reason was that it could potentially reduce auditing and accounting burdens, and it could ease pricing for low-potency products and potentially boost product availability, relative to a weight-based tax.²⁷

Regardless of the tax scheme, there are two potential threats to state cannabis tax revenue to consider, including black-market and cross-border competition. The impact of black-market competition on legal adult-use demand is not well understood, likely because of a lack of black-market sales data. Consumer surveys can be used to gauge black-market use. A report by the California Cannabis Advisory Committee noted that the black market continued to flourish due to the higher prices in the legal adult-use market and a lack of enforcement efforts to support licensed businesses.²⁸

A study of legal adult-use sales in Washington State shows that cannabis retailers passed all cost shocks to consumers. This suggests that consumers may be willing to absorb additional costs to stay in the legal market.²⁹ These conflicting observations could reflect the unique cannabis market in each state.

Cross-border competition poses another long-term risk to states with legal cannabis. When a state with legal cannabis borders states without it, it captures cannabis tourism revenues from the neighboring states. However, once a neighboring state legalizes cannabis sales, retail sales near the border can drop considerably. For example, retailers in Washington located along the border with Oregon experienced a 36% decline in sales immediately after Oregon started legal adult-use sales in 2015.³⁰

Market saturation

A challenge in a growing market is understanding the point of market saturation. When more stores enter the market, they may reduce the prices to capture diminishing market share. From the perspective of the tax authority, when the retail sales are taxed as a percent of sales, a decrease in prices can result in declining tax revenues. Therefore, it is important to understand the number of retail stores the market demand can support. Legal cannabis sales have a relatively short history in the United States, with states imposing different regulations. Thus, there is no exact answer as to the number of retail stores to reach market saturation.

Nevertheless, to shed light on this question, we look to the other three states that have a relatively long legal cannabis sales history: Colorado, Oregon, and Washington. By 2018 in Oregon, three years after

²⁶ The Stronger the Joint, the Higher the Tax? Report Weighs California Marijuana Tax Change. December 21, 2019. Anchorage Daily News. Available at <https://www.adn.com/nation-world/2019/12/21/the-stronger-the-joint-the-higher-the-tax-report-weighs-california-marijuana-tax-change/>, retrieved on June 6, 2020.

²⁷ Pot Sector Players Welcome Edibles Tax Change, Disappointed Medical Tax Remains. March 20, 2019. CBC. Available at <https://www.cbc.ca/news/business/pot-edibles-tax-change-1.5064871>, retrieved on June 6, 2020.

²⁸ California Bureau of Cannabis Control. 2018. California Cannabis Advisory Committee 2018 Annual Report.

²⁹ Hollenbeck B, Uetake K. October 2018. Taxation and Market Power in the Legal Marijuana Industry. UCLA Working Paper.

³⁰ Hansen B, Miller K, Weber C. February 2020. Federalism, Partial Prohibition, and Cross-Border Sales: Evidence from Recreational Marijuana. NBER Working Paper No. 23762.

the first legal adult-use sale, cannabis tax revenue has been unstable compared with Colorado and Washington.³¹ Oregon had significantly more stores per capita than Colorado and Washington, with 13.3 stores per 100,000 residents, compared to 9.0 and 1.3 in Colorado and Washington, respectively.³² Mapping the stores per capita onto Massachusetts's current population, Massachusetts is a long way from a possible saturation point, which may range from 627 to 921 stores, based on the experiences from Colorado, Oregon, and Washington.

³¹ The Pew Charitable Trusts. August 2019. Forecasts Hazy for State Marijuana Revenue.

³² How Many Dispensaries Are In Each State? February 12, 2018. High Times. Available at: <https://hightimes.com/dispensaries/how-many-state/>, retrieved on June 16, 2020.

4. Conclusion

Annual cannabis sales in Massachusetts have the potential to reach \$1 billion by June 2021 (i.e., July 2020 through June 2021) with the current tax of 20%, which will generate annual tax revenue of about \$200 million. The significant growth in cannabis sales and tax revenue is primarily driven by the increase in new retail stores in the coming year.

All alternative tax schemes, except for one weight-based tax scheme, are estimated to generate more tax revenue, compared with the current price-based tax of 20%. That being said, the changes in tax revenue under the weight-based and potency-based tax schemes are relatively small. Additionally, these changes in tax revenue may be short term in nature. It is unclear whether these changes will persist in the long run, especially in a more mature and more competitive market. A higher tax rate may also lead to a potential move of consumers from the legal to the black market.

The cannabis demand may become more elastic in Massachusetts as the market matures. With a more elastic demand, a higher tax rate may still generate more tax revenue, but only up to a certain threshold.

We also qualitatively assessed the potential advantages and disadvantages of the alternative tax schemes. A price-based tax is straightforward and has a lower administration and compliance burden for both state tax authorities and taxpayers. A weight-based tax may be less vulnerable to a price reduction in the long term and could contribute to a more stable tax revenue. However, a weight-based tax may inadvertently encourage the cultivation and consumption of more potent cannabis products. In contrast, a potency-based tax may generate public health benefits by discouraging the use of more potent products. Both weight-based and potency-based taxes may increase the administrative and compliance burdens on state tax authorities and taxpayers. Decisions about tax scheme changes require careful consideration of their revenue and nonrevenue impacts.

Our results are based on several assumptions and have significant limitations. Any projection of future tax revenue is inherently uncertain. Our projection is further complicated by the considerable uncertainties around the impact of COVID-19 on the economy and, more specifically, on the legal adult-use cannabis market in Massachusetts. The results of this study should be interpreted with careful consideration of these assumptions and limitations.

In short, we found that alternative regimes—based on weight or potency—result in relatively small changes in sales and tax revenues. Increasing the current rate may result in higher revenues in the short term, but in the long term may lead to a potential move of consumers from the legal to the illegal market. The legal cannabis industry in Massachusetts is in an infant stage, and a large-scale change to taxation could cause unpredictable disruption to the market.

Future analyses

Future analyses are needed to understand the potentially changing impacts of alternative tax schemes. CCC should consider undertaking additional analyses to understand the possibly changing impacts of

alternative tax schemes. First, the cannabis sales and tax revenue forecast model will require periodic re-estimation to reflect changing market and consumer behavior in a more mature market, especially in a post-COVID “regime.” How consumers respond to price and tax changes may evolve, which may affect the forecast of cannabis sales and tax revenues.

Second, an economic impact analysis can provide a more comprehensive understanding of the economic benefits of the adult-use cannabis market in Massachusetts. The economic benefits include not only the cannabis tax revenues but also the job creation and contribution to the gross state product. An economic impact analysis can also help CCC estimate the additional tax revenues from industries in the cannabis supply chain that benefit from the legal cannabis market.

Appendix

- Appendix 1: Weight and potency conversion
- Appendix 2: Regression model output
- Appendix 3: Tax revenue by tax and price elasticity
- Appendix 4: Adult-use cannabis tax scheme by state

Appendix 1: Weight and potency conversion

To project tax revenue for weight-based and THC-based tax schemes, we impute the weight and potency for each cannabis product group based on the following approach:

Weight conversion

1. Raw cannabis products:
 - 1.1. If weight data were available for raw cannabis, no conversion was necessary.
 - 1.2. If weight data were not available, the price was divided by the average price of a gram of cannabis. This amount was then used as the weight.
 - 1.2.1. E.g., no known weight, the average price per gram = \$14 (calculated from the known set), price of a unit in a given row of data is \$49, $\$49/\$14 = 3.5$ grams.
2. Infused products:
 - 2.1. The average amount of THC in milligrams was calculated for each infused category by unit: 0.09 grams per infused (edible) and 0.22 grams per infused (nonedible).
 - 2.2. The THC milligram weight was multiplied by 5.2, the grams of raw cannabis that are used to manufacture one gram of an infused or concentrate product.³³
3. Concentrate products:
 - 3.1. If the weight data were available, the weight of the final product was multiplied by 5.2 to derive the source weight.
 - 3.2. If the weight data were not available, it was calculated at unit-to-gram on a 1-to-1 basis, then multiplied by 5.2.

Potency conversion

We grouped the product categories following Illinois's approach to segment cannabis products into three THC levels. Research and confirmation from the CCC indicate that raw cannabis products do not exceed 35% THC by volume.³⁴ Using the same data and with confirmation from the CCC, it was concluded that concentrate products nearly always exceed 35% THC. THC calculations and research were unnecessary for infused products as they are already aligned with the Illinois tax scheme.

³³ The conversion ratio was confirmed through conversations with subject matter experts at the CCC.

³⁴ Source <https://patriotcare.org/greenfield-menu/> and <https://www.cultivatemass.com/leicester-menu>, retrieved on April 13, 2020.

Appendix 2: Regression model output

The table below presents the factors that determine the quantity of cannabis sold in the Massachusetts legal market. The analysis is based on daily sales totals by store and product group. The data covers the period from November 2018 to March 2020, and a total of 30,224 observations.

The coefficient of the Ln (Price) reflects the percentage-point change in the daily sales of legal cannabis associated with a 1 percentage-point change in its price. Each 1-percentage-point increase in the price of legal cannabis is associated with a decrease in daily sales of legal cannabis of 0.44 percent. Similarly, the coefficient of the Ln (Black-market price) reflects the percentage-point change in the daily sales of legal cannabis associated with a 1 percentage-point change in the price of black-market cannabis.

Independent Variables	Ln (Quantity Sold)	
	Coefficient	Standard Error
Ln (Price)	-0.44***	(0.01)
Ln (Black-market price)	0.11***	(0.02)
Infused (base = Concentrate)	-1.33***	(0.02)
Raw (base = Concentrate)	1.63***	(0.02)
Number of Active Retailers	-0.001	(0.002)
Store Age	0.20***	(0.01)
Store Age Squared	-0.01***	(0.0004)
Vape Ban * Concentrate	-0.69***	(0.01)
Vape Ban * Infused	0.03*	(0.01)
Vape Ban * Raw	0.08***	(0.01)
Constant	6.45***	(0.07)
Sample Size (retailer/product group/day level)	30,224	
R-squared	0.91	

Note: *** p<0.01, ** p<0.05, * p<0.1. Coefficients of store fixed effects not shown.

Appendix 3: Tax revenue by tax rate and price elasticity

		Price Elasticity of Demand								
		-0.44	-0.5	-1	-1.5	-2	-2.5	-3	-3.5	-4
Tax Rate	10%	52%	52%	54%	56%	58%	60%	63%	65%	67%
	15%	76%	77%	78%	80%	81%	83%	84%	86%	88%
	20%	100%	100%	100%	100%	100%	100%	100%	100%	100%
	25%	123%	122%	120%	117%	115%	112%	109%	107%	104%
	30%	145%	144%	138%	131%	125%	119%	113%	106%	100%

Note: Red cells indicate a lower tax revenue compared with the current 20% tax rate. Green cells indicate a higher tax revenue compared with the current 20% tax rate.

Appendix 4: Adult-use cannabis tax scheme by state

State	Taxed Transactions	State/(Local) Retail Tax	Cannabis Tax Rate(s)
Alaska	Cultivation	0%	\$50/ounce for flower \$15/ounce for trim \$25/ounce for immature flowers/buds \$1.00 per clone
California	Cultivation/Retail	7.25% + (0 to 3.25%)	15% – Retail sales \$9.65/ounce for flower \$2.87/ounce for leaves \$1.35/ounce for fresh plant material
Colorado	Cultivation/Retail	0% ³⁵ + (0 to 8.3%)	15% – Retail sales 15% – State cultivator excise tax
Illinois	Cultivation/Retail	6.25% + (0 to 4.75%)	7% – Sales to dispensaries 0 to 3% – Local tax [7/1/2020] 10% – Retail sales (THC<35%) 20% – Retail sales (Infused) 25% – Retail sales (THC>35%)
Maine	Cultivation/Retail	5.5%	10% – Retail sales \$20.94/ounce for flower \$5.86/ounce for trim \$1.50 per seedling \$0.30 per seed
Massachusetts	Retail	6.25%	10.75% – State retail sales 3% – Local retail sales
Michigan	Retail	6%	10% – Retail sales
Nevada	Cultivation/Retail	6.85% + (0 to 1.525%)	15% – Sales to dispensaries 10% – Retail sales
Oregon	Retail	0%	17% – State retail sales 3% – Local retail sales
Washington	Retail	6.5% + (0.5 to 4%)	37% – Retail sales

Note: Tax scheme at the time of this study.

³⁵ While Colorado has a statewide retail sales tax, it is not applied to cannabis sales.

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Cannabis Control Commission

Monthly Public Meeting

July 9, 2020 at 10:00 a.m. via Microsoft Teams Live

Agenda

1. Call to Order
2. Chairman's Comments and Updates
3. Minutes for Approval
4. Executive Director's Report
5. Enforcement Actions
6. Staff Recommendations on Changes of Ownership
7. Staff Recommendations on Changes of Location
8. Staff Recommendations on Renewals
9. Staff Recommendations on Final Licenses
10. Staff Recommendations on Provisional Licenses
11. Commission Discussion and Votes
12. New Business that the Chair did not Anticipate at the Time of Posting
13. Next Meeting Date
14. Executive Session
15. Adjournment




Executive Director's Report

Highlights from Licensing Data*

- 341 applications awaiting first review
- 70 applications awaiting staff recommendation
- 61 applications awaiting 3rd party responses
- 82,201 certified active patients

*Full data available at the end of slide presentation





Staff Recommendations on Licensure

Enforcement Actions

- a. Garden Remedies, Inc.
- b. The Botanist, Inc.
- c. Healthy Pharms, Inc.



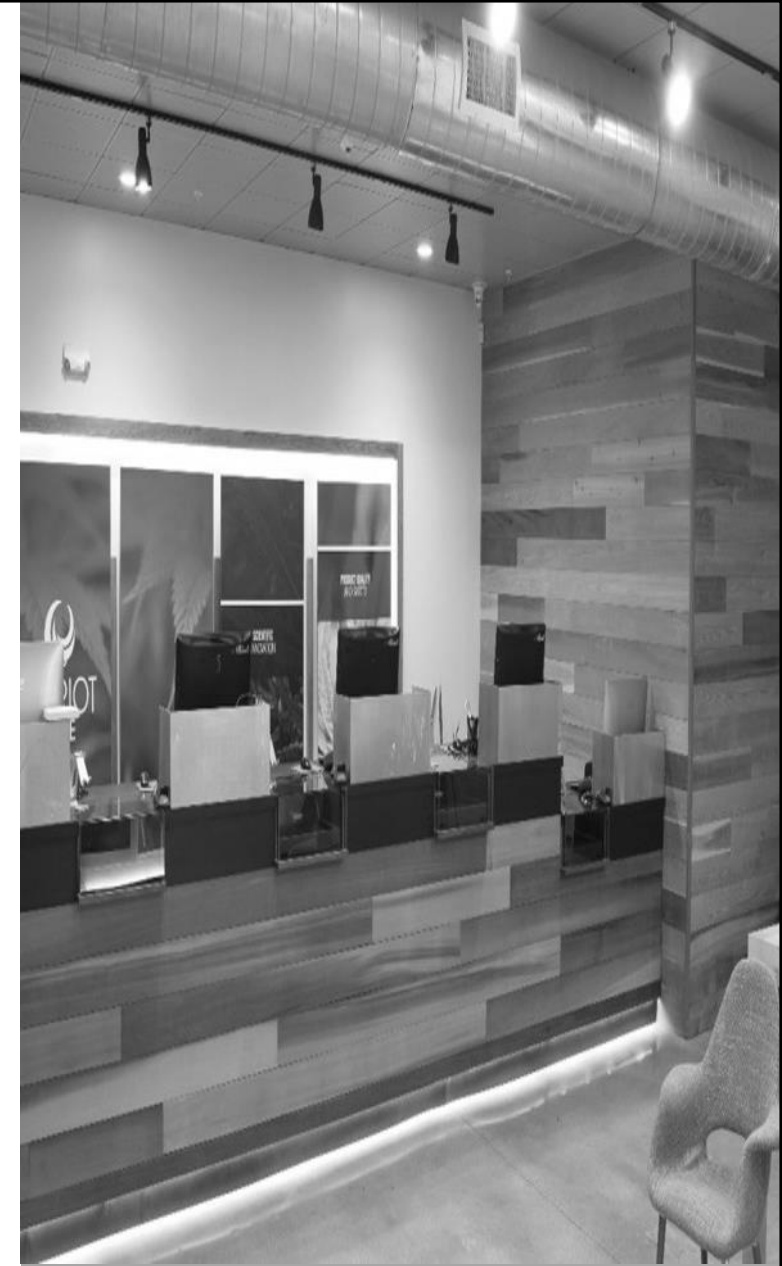
Staff Recommendations: Changes of Ownership

- a. Garden Remedies, Inc.
- b. Krypties, LLC
- c. Pharmacannis Massachusetts, Inc.



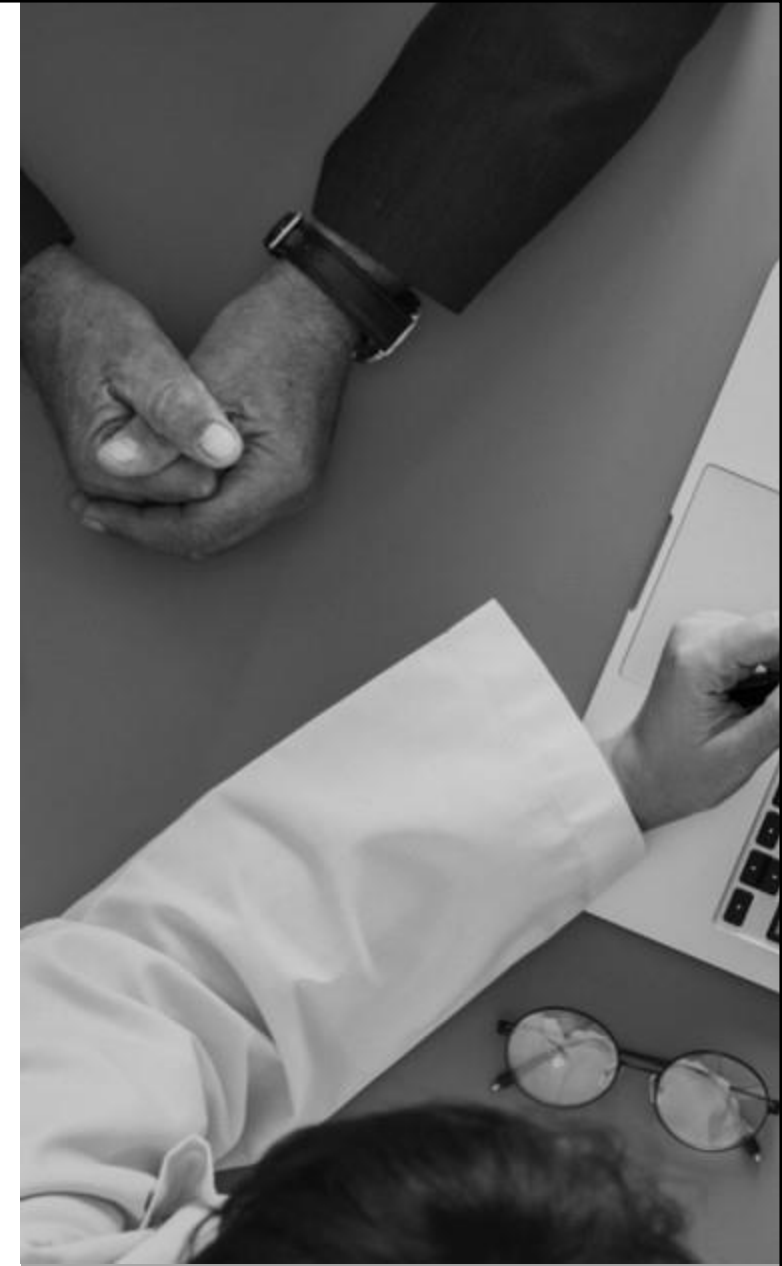
Staff Recommendations: Changes of Location

- a. NS AJO Holdings, Inc.
- b. Liberty Market, LLC



Staff Recommendations: Renewals

- a. Mission MA, Inc. (#MRR205582)
- b. Sira Naturals, Inc. (#MCR139882)
- c. Sira Naturals, Inc. (#MPR243523)
- d. Sira Naturals, Inc. (#MXR126656)
- e. Mass Yield Cultivation LLC. (#MCR139879)
- f. Krypies LLC (#MRR205586)
- g. Caregiver-Patient Connection LLC (#MRR205589)
- h. Massgrow, LLC (#MPR243518)
- i. Massgrow, LLC (#MCR139875)
- j. Bud's Goods & Provisions, Corp. (#MCR139883)



Staff Recommendations: Renewals

k. Bud's Goods & Provisions, Corp. (#MPR243526)

l. BeWell Organic Medicine, Inc. (#RMD1245)

m. Garden Remedies, Inc. (#RMD1005)

n. Bountiful Farms, Inc. (#RMD1485)

o. Heka, Inc. Vertically Integrated Medical Marijuana Treatment Center

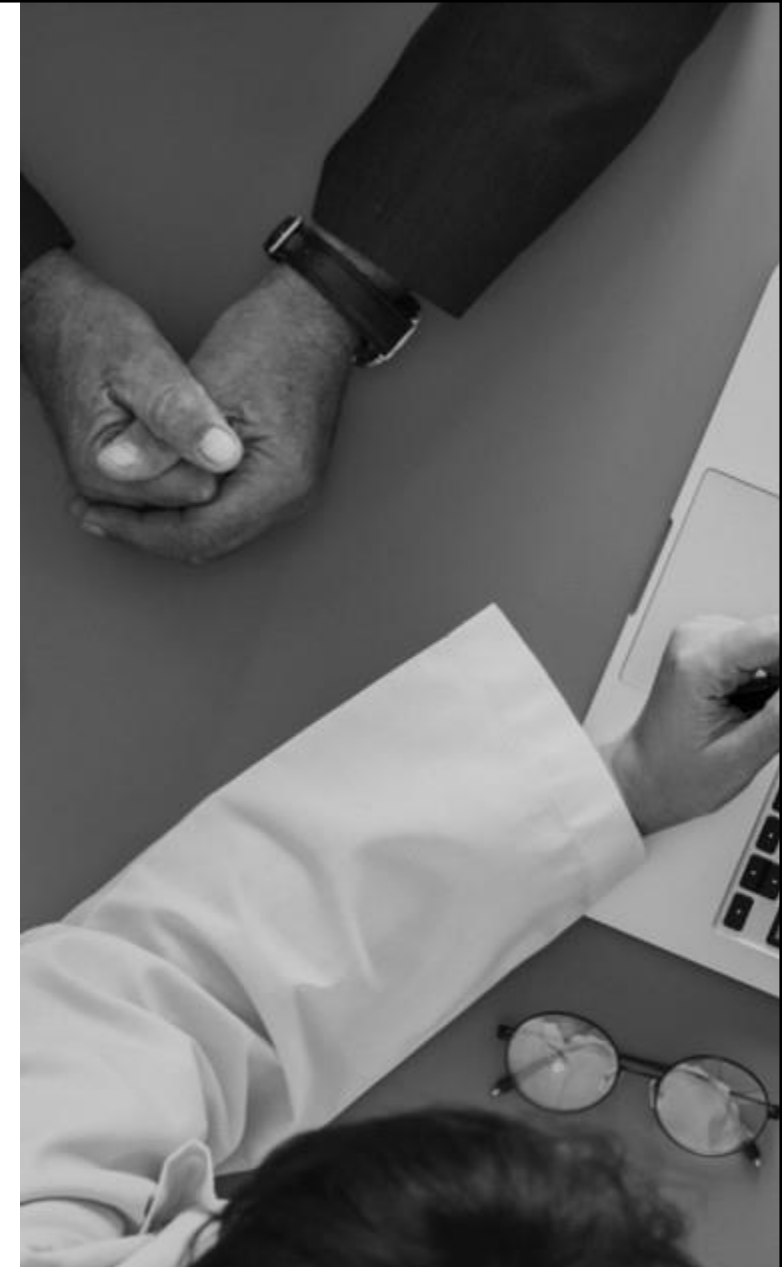
p. Heka, Inc. (#RMD1385)

q. Mayflower Botanicals, Inc., Vertically Integrated Medical Marijuana Treatment Center

r. Northeast Alternatives, Inc. (#RMD745)

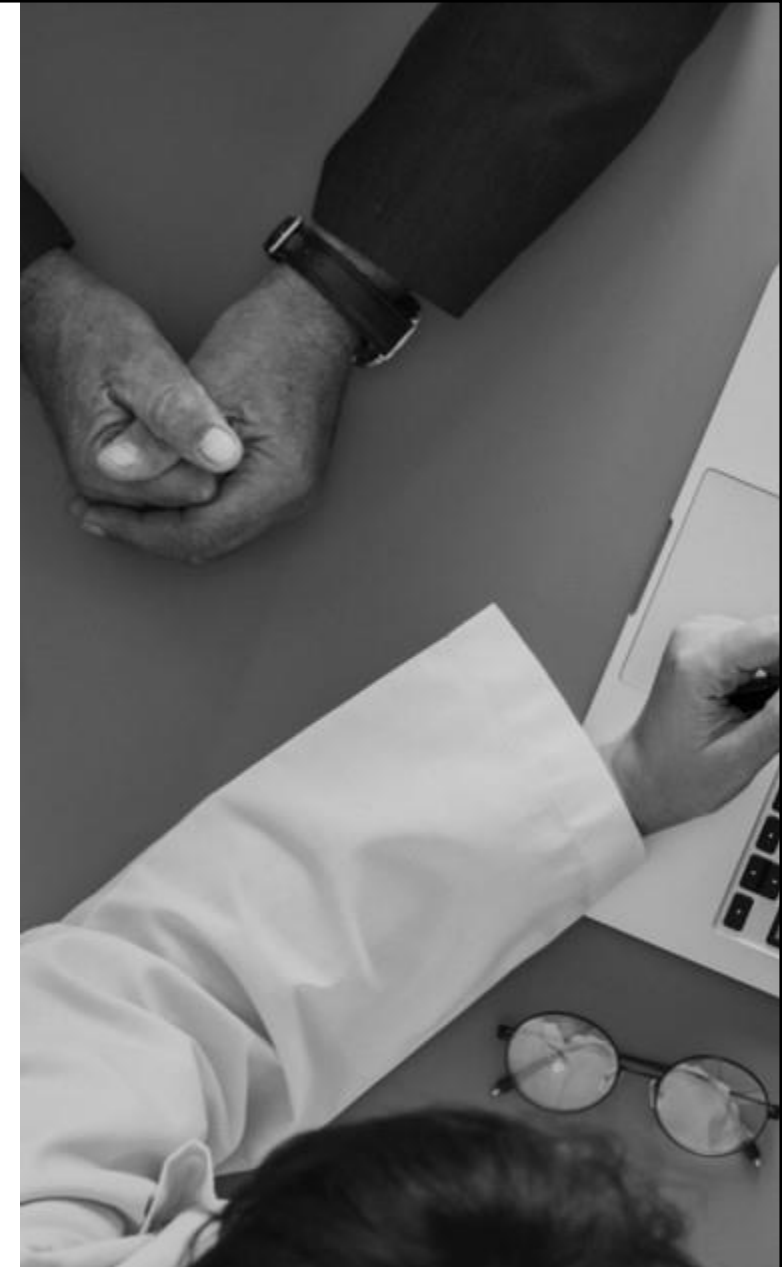
s. NS AJO Holdings, Inc., Vertically Integrated Medical Marijuana Treatment Center (Fitchburg – Fitchburg)

t. NS AJO Holdings, Inc., Vertically Integrated Medical Marijuana Treatment Center (Fitchburg – Watertown)



Staff Recommendations: Renewals

- u. Sira Naturals, Inc., Vertically Integrated Medical Marijuana Treatment Center
- v. Solurge, Inc., Vertically Integrated Medical Marijuana Treatment Center
- w. Revolutionary Clinics II, Inc. (#RMD1346)
- x. Revolutionary Clinics II, Inc. (#RMD925)
- y. Wellness Connection of MA, Inc., Vertically Integrated Medical Marijuana Treatment Center
- z. Agricultural Healing, Inc., Vertically Integrated Medical Marijuana Treatment Center
- aa. Commcan, Inc. (#RMD565)
- bb. Ipswich Pharmaceutical Associates, Inc. (#RMD1306)
- cc. Cannatech Medicinals, Inc. (#RMD1105)

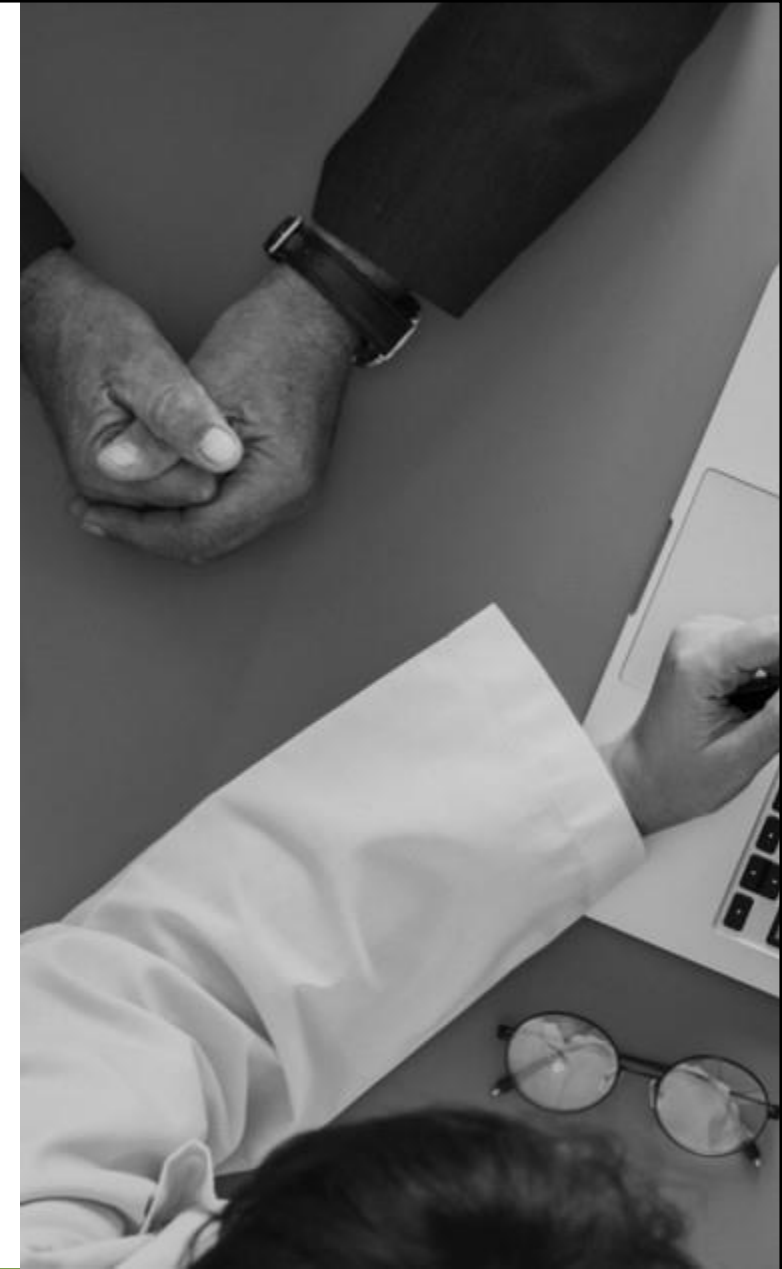


Staff Recommendations: Renewals

dd. INSA, Inc. (#RMD365)

ee. INSA, Inc. (#RMD845)

ff. Sanctuary Medicinals, Inc. (#RMD1127)



Staff Recommendations: Final Licenses

- a. Cannavanna, Inc. f/k/a Fidelity Wellness Center (#MR282801), Retail
- b. Four Daughters Compassionate Care d/b/a Zen Leaf Plymouth (#MR281552), Retail
- c. Four Daughters Compassionate Care d/b/a Zen Leaf Plymouth (#MR282232), Retail
- d. Garden Remedies, Inc. (#MR282471), Retail
- e. Pharmacannis Massachusetts, Inc. d/b/a Verilife (#MR282298), Retail
- f. Patient Centric of Martha's Vineyard, LTD, Vertically Integrated Medical Marijuana Treatment Center



Staff Recommendations: Provisional Licenses

- a. 202 Trading Company, LLC (#MRN281735), Retail
- b. 6 Bricks, LLC (#MRN283098), Retail
- c. Alexsofia, LLC (#MRN282926), Retail
- d. BKPN, LLC (#MRN282853), Retail
- e. Buudda Brothers 90 Sargeant Street, LLC (#MCN282254), Cultivation, Tier 3 / Indoor
- f. Buudda Brothers 90 Sargeant Street, LLC (#MPN281870), Product Manufacturer
- g. Calyx Peak of MA, Inc. (#MCN281927), Cultivation, Tier 3 / Indoor
- h. Calyx Peak of MA, Inc. (#MPN281574), Product Manufacturer
- i. Canna Provisions, Inc. (#MCN282476), Cultivation, Tier 3 / Indoor
- j. Coastal Cultivars, LLC (#MCN282052), Cultivation, Tier 11 / Outdoor



Staff Recommendations: Provisional Licenses

- k. Comm Ave Canna, Inc. (#MRN282314), Retail
- l. Coyote Cannabis Corporation (#MCN282498), Cultivation, Tier 1 / Indoor
- m. Coyote Cannabis Corporation (#MPN281798), Product Manufacturer
- n. DDM Sales, Inc. (#MRN281981), Retail
- o. Deep Roots, Inc. (#MBN281496), Microbusiness, Cultivation and Product Manufacturing Operations
- p. Deerfield Naturals, Inc. (#MCN281426), Cultivation, Tier 3 / Indoor
- q. Deerfield Naturals, Inc. (#MPN281541), Product Manufacturer
- r. Deerfield Naturals, Inc. (#MRN281929), Retail
- s. Eskar Arlington, LLC (#MRN282638), Retail
- t. Eskar Northbridge, LLC (#MRN283073), Retail



Staff Recommendations: Provisional Licenses

- u. Four Score Holdings, LLC (#MCN282187), Cultivation, Tier 2 / Indoor
- v. Four Score Holdings, LLC (#MPN281689), Product Manufacturer
- w. Four Score Holdings, LLC (#MRN282757), Retail
- x. Green Leaf Health, Inc. (#MRN282991), Retail
- y. Green Meadows Farm, LLC (#MCN282409), Cultivation, Tier 3 / Indoor
- z. Green Meadows Farm, LLC (#MPN281763), Product Manufacturer
- aa. GTE Franklin, LLC (#MRN282766), Retail
- bb. Heal Cultivation, LLC (#MCN282119), Cultivation, Tier 2 / Indoor
- cc. Heal Cultivation, LLC (#MPN281658), Product Manufacturer
- dd. Holistic Industries Inc. (#MRN282667), Retail



Staff Recommendations: Provisional Licenses

- ee. Holyoke 420, LLC (#MRN282703), Retail
- ff. HTC Trinity, LLC (#MRN283121), Retail
- gg. Hudson Growers Alliance, LLC (#MCN282581), Cultivation, Tier 1 / Indoor
- hh. LMCC, LLC (#MRN282885), Retail
- ii. MJ's Market, Inc. (#MCN281274), Cultivation, Tier 1 / Indoor
- jj. MJ's Market, Inc. (#MPN281758), Product Manufacturer
- kk. MJ's Market, Inc. (#MRN281457)
- ll. Neo Manufacturing MA, LLC (#MCN282043), Cultivation, Tier 3 / Indoor
- mm. Neo Manufacturing MA, LLC (#MPN281622), Product Manufacturer
- nn. New Green, LLC (#MRN282969), Retail



Staff Recommendations: Provisional Licenses

- oo. New Leaf Enterprises, Inc. (#MRN283203), Retail
- pp. New Leaf Enterprises, Inc. (#MRN283204), Retail
- qq. Patient Centric of Martha's Vineyard, LTD. (#MCN282347), Cultivation, Tier 1 / Indoor
- rr. Patient Centric of Martha's Vineyard, LTD. (#MPN281747), Product Manufacturer
- ss. Patient Centric of Martha's Vineyard, LTD. (#MRN282947), Retail
- tt. Peak Limited, LLC (#MCN282217), Cultivation, Tier 2 / Indoor
- uu. Peak Limited, LLC (#MPN281707), Product Manufacturer
- vv. Royal Hemp, LLC (#MPN281741), Product Manufacturer
- ww. Royal Hemp, LLC (#MRN282799), Retail
- xx. Salisbury Cultivation and Production Manufacturing, LLC (#MCN282530), Cultivation, Tier 3 / Indoor
- yy. Salisbury Cultivation and Production Manufacturing, LLC (#MPN281819), Product Manufacturer



Staff Recommendations: Provisional Licenses

- zz. Salty Farmers, LLC (#MCN282276), Cultivation, Tier 1 / Indoor
- aaa. Salty Farmers, LLC (#MRN282640), Retail
- bbb. Solurge, Inc. (#MCN281300), Cultivation, Tier 3 / Indoor
- ccc. Solurge, Inc. (#MPN281591), Product Manufacturer
- ddd. Solurge, Inc. (#MRN282372), Retail
- eee. Ten-Ten, LLC (#MCN282523), Cultivation, Tier 3 / Indoor
- fff. Ten-Ten, LLC (#MCN282524), Cultivation, Tier 3 / Outdoor
- ggg. Ten-Ten, LLC (#MPN281809), Product Manufacturer
- hhh. Ten-Ten, LLC (#MRN283165), Retail
- iii. The Botanist, Inc. (#MRN282160), Retail
- jjj. The Botanist, Inc. (#MRN282186), Retail



Staff Recommendations: Provisional Licenses

kkk. The Fresh Connection Boston, LLC (#MCN281442), Cultivation, Tier 2 / Indoor
lll. The High End Chocolate Company, LLC (#MPN281656), Product Manufacturer
mmm. The High End Wellness Company, LLC (#MRN282666), Retail
nnn. The Hub Craft, LLC (#MCN282323), Cultivation, Tier 3 / Indoor
ooo. The Hub Craft, LLC (#MPN281740), Product Manufacturer
ppp. Tree Market Taunton, LLC (#MRN281597), Retail
qqq. Union Leaf, Inc. (#MRN282570), Retail
rrr. Volcann, LLC (#MRN282925), Retail
sss. Theory Wellness, Inc. Vertically Integrated Medical Marijuana Treatment Center





Commission Discussion & Votes

Commission Discussion & Votes

- Report to the Legislature on Alternative Tax Structures



Upcoming Meetings & Regulatory Calendar

Regulatory Calendar

July 20	Week of August 3	August 6	August 14	September 10	September 24
<ul style="list-style-type: none">• Public meeting for vote on proposed regulations• Public comment period opens	<ul style="list-style-type: none">• Public Hearing on proposed regulations	<ul style="list-style-type: none">• Regularly scheduled monthly Commission meeting	<ul style="list-style-type: none">• End of public comment period	<ul style="list-style-type: none">• Regularly scheduled monthly Commission meeting	<ul style="list-style-type: none">• Public meeting for vote on final regulations

Executive Session & Adjournment



Licensing Data

Licensing Applications | July 9, 2020

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

Type	#
Craft Marijuana Cooperative	2
Delivery-Only Pre-Certification	13
Independent Testing Laboratory	3
Marijuana Cultivator	97
Marijuana Microbusiness	6
Marijuana Product Manufacturer	72
Marijuana Research Facility	5
Marijuana Retailer	134
Marijuana Transporter with Other Existing ME License	2
Microbusiness Delivery Endorsement	1
Third Party Transporter	6
Total	341

Licensing Applications | July 9, 2020

The totals below are all license applications received to date.

Type	#
Pending (All 4 packets submitted)	341
Withdrawn	607
Incomplete (Less than 4 packets submitted)	4,778
Denied	4
Approved: Delivery-Only Pre-Certification	13
Approved	477
Total	6,220

Licensing Applications | July 9, 2020

The totals below are number of licenses approved by category.

Type	#
Craft Marijuana Cooperative	1
Independent Testing Laboratory	6
Marijuana Cultivator	146
Marijuana Microbusiness	12
Marijuana Product Manufacturer	115
Marijuana Research Facility	0
Marijuana Retailer	191
Marijuana Third Party Transporter	1
Marijuana Transporter with Other Existing ME License	5
Total	477

Licensing Applications | July 9, 2020

The totals below are number of licenses approved by stage.

Type	#
Provisionally Approved	60
Provisional License	269
Final License	25
Commence Operations	123
Total	477

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

Licensing Applications | July 9, 2020

Status	#
Application Submitted: Awaiting Review	10
Application Reviewed: More Information Requested	200
Application Deemed Complete: Awaiting 3 rd Party Responses	61
All Information Received: Awaiting Staff Recommendation	70
Applications Considered by Commission	494
Total	835



Licensing Applications | July 9, 2020

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

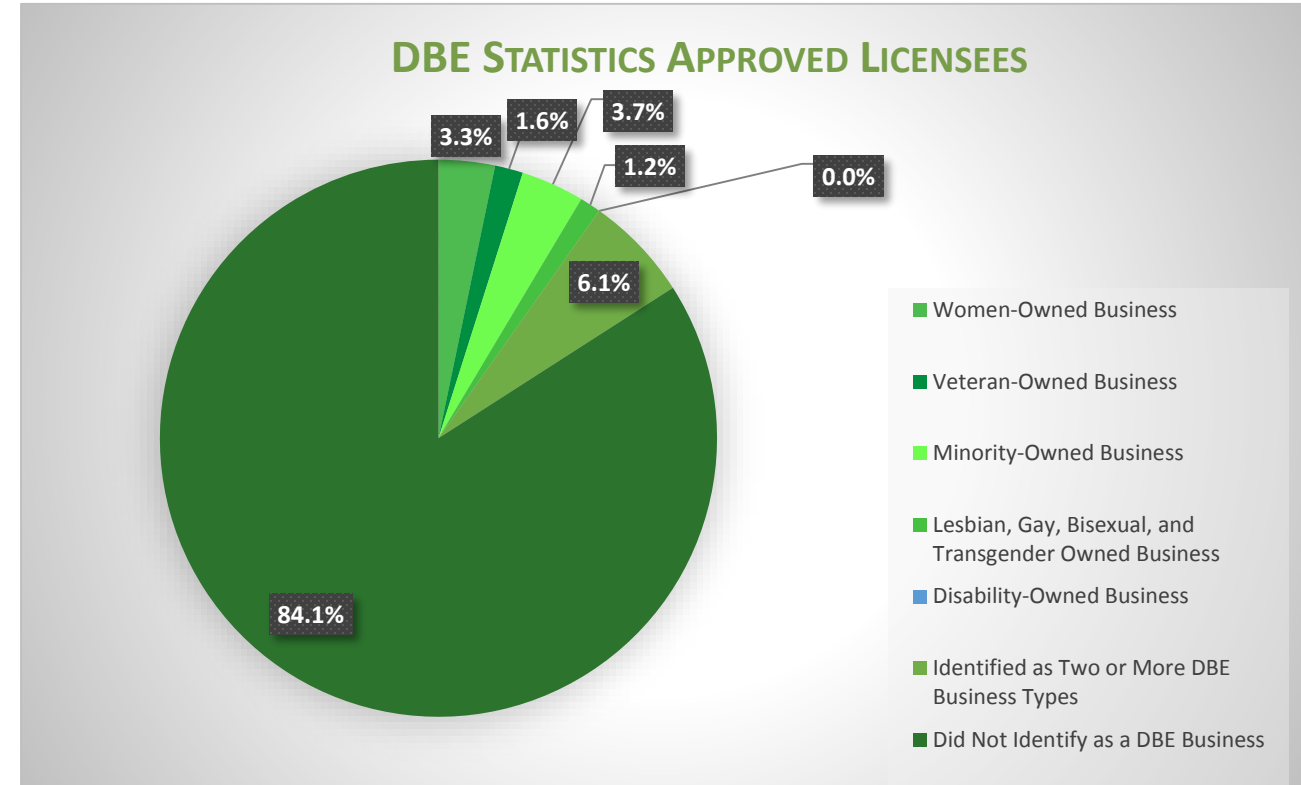
The 835 applications represent 450 separate entities

Type	#
RMD Priority	239
Economic Empowerment Priority	28
Expedited Review	149
General Applicant	419
Total	835

Expedited Applications	
Expedited: License Type	22
Expedited: Social Equity Participant	44
Expedited: Disadvantaged Business Enterprise	69
Expedited: Two or More Categories	14
Total	149

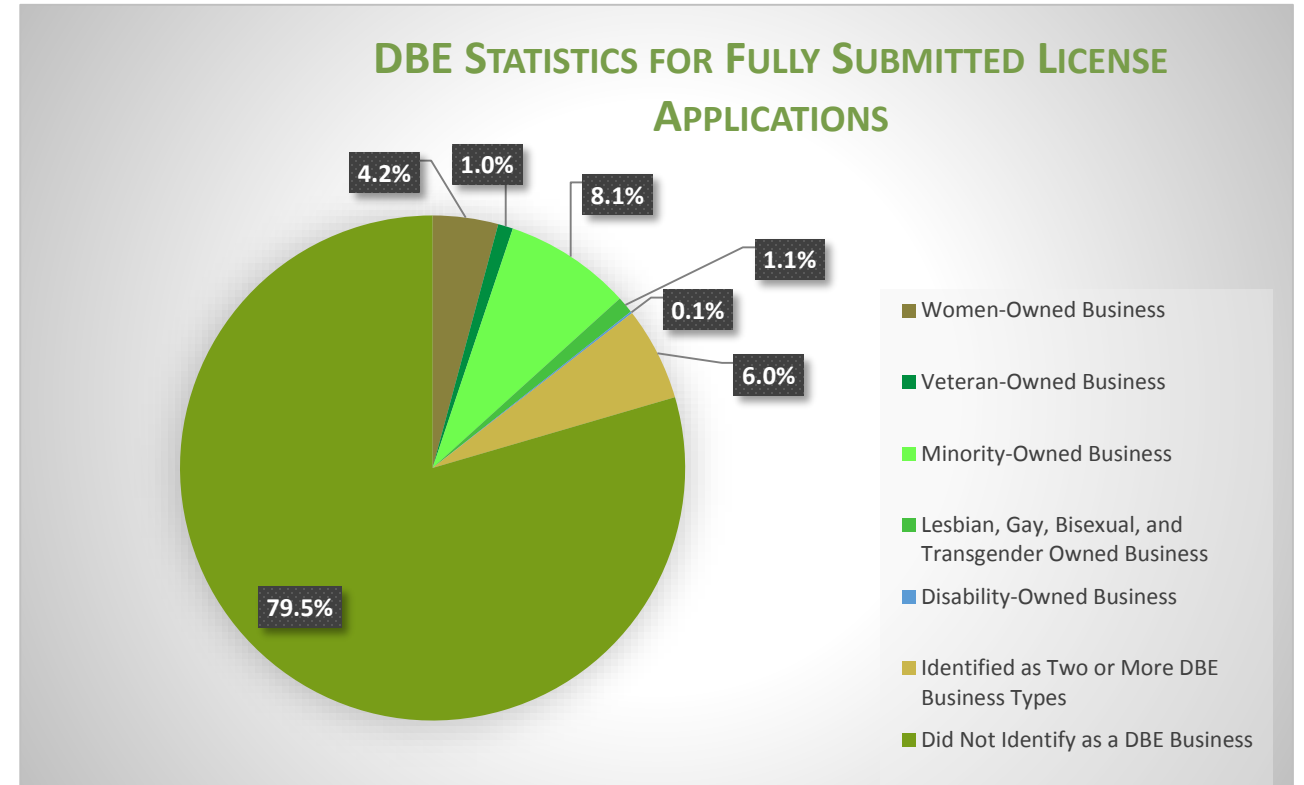
Disadvantaged Business Enterprise Statistics for Approved Licensees

Type	#	% of Group
Women-Owned Business	16	3.3%
Veteran-Owned Business	8	1.6%
Minority-Owned Business	18	3.7%
Lesbian, Gay, Bisexual, and Transgender Owned Business	6	1.2%
Disability-Owned Business	0	0%
Identified as Two or More DBE Business Types	30	6.1%
Did Not Identify as a DBE Business	412	84.1%
Total	490	100%



Disadvantaged Business Enterprise (DBE) Statistics for Fully Submitted License Applications

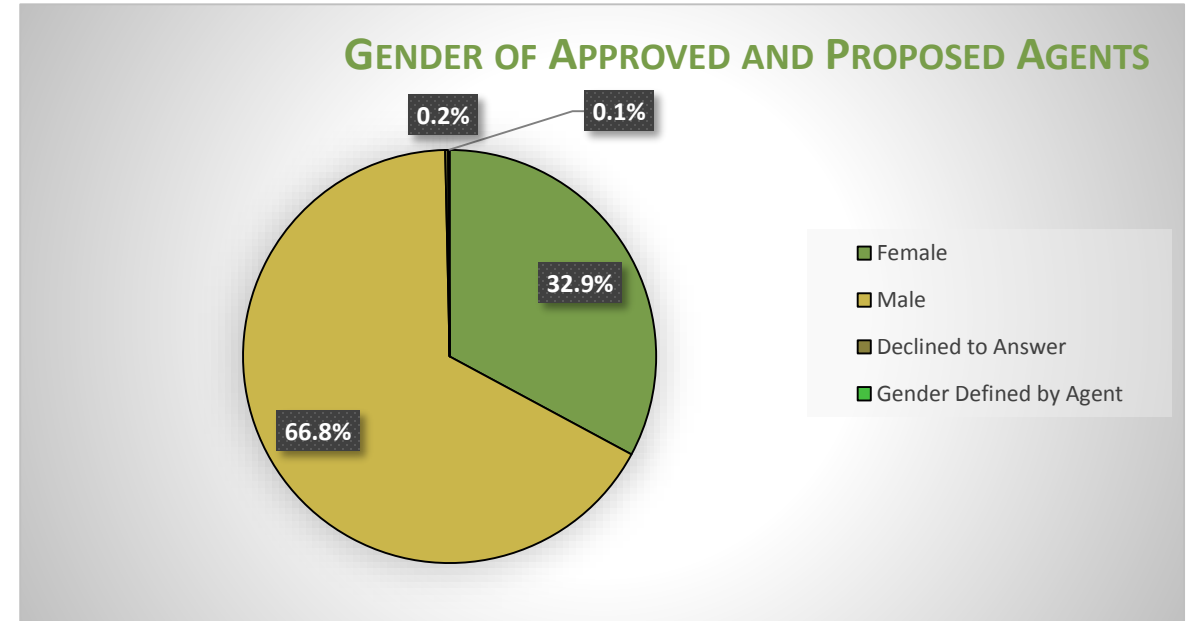
Type	#	% of Group
Women-Owned Business	35	4.2%
Veteran-Owned Business	8	1%
Minority-Owned Business	68	8.1%
Lesbian, Gay, Bisexual, and Transgender Owned Business	9	1.1%
Disability-Owned Business	1	0.1%
Identified as Two or More DBE Business Types	50	6%
Did Not Identify as a DBE Business	664	79.5%
Total	835	100%



Agent Applications | July 9, 2020

Demographics of Approved and Pending Agents

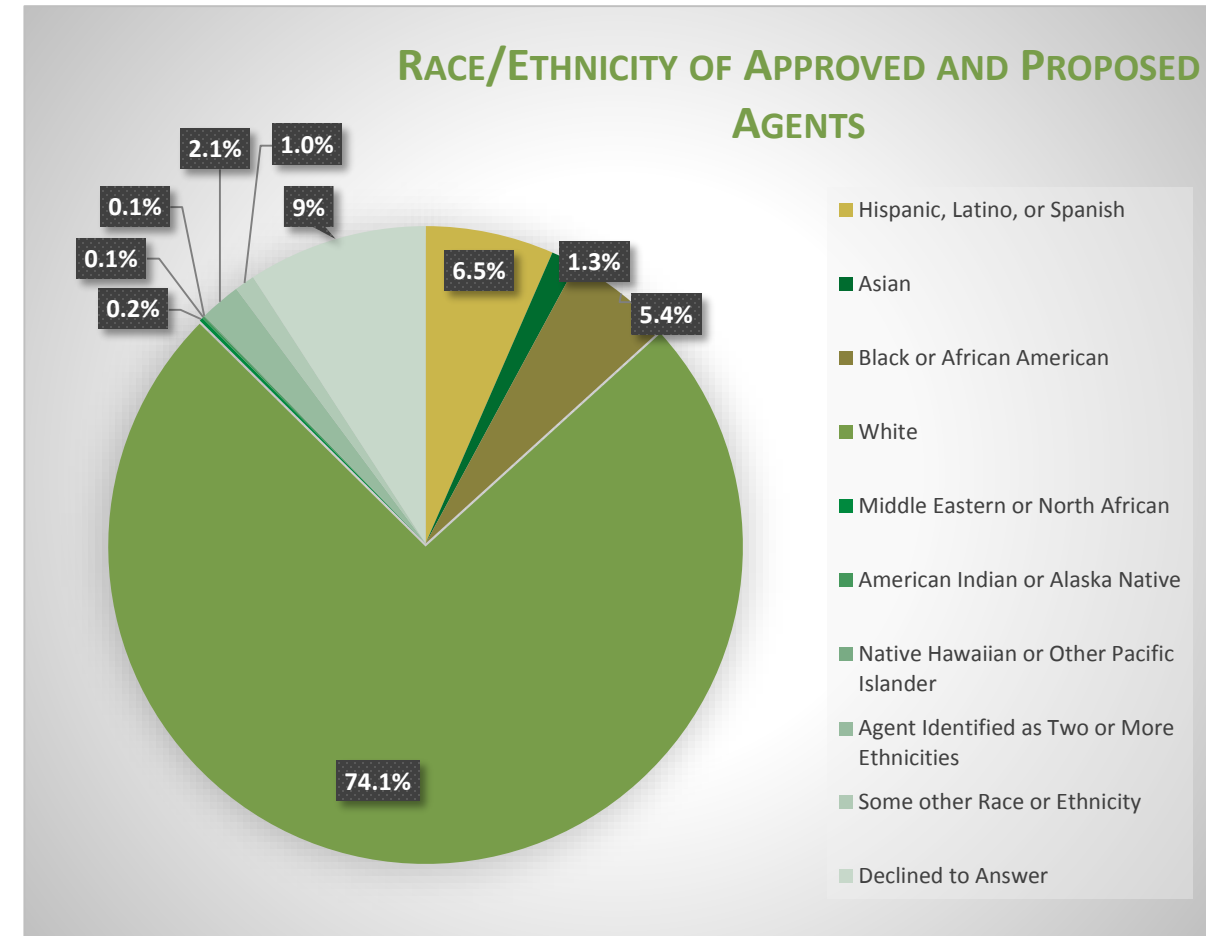
Gender	#	%
Female	2,883	32.9%
Male	5,830	66.8%
Declined to Answer	20	0.2%
Gender Defined by Applicant	10	0.1%
Total	8,773	100%



Agent Applications | July 9, 2020

Demographics of Approved and Pending Agents

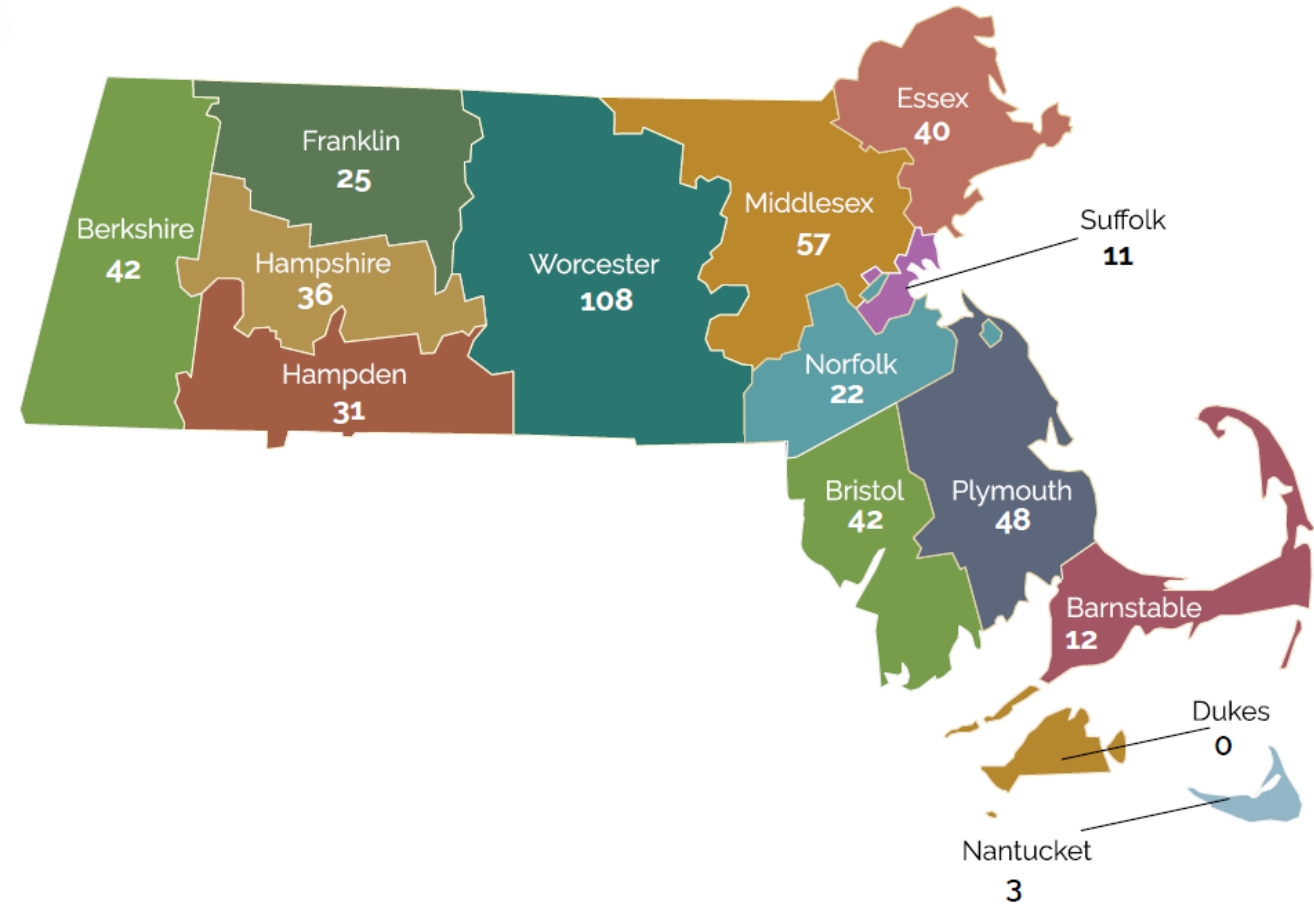
Race/Ethnicity	#	%
Hispanic; Latino; Spanish	574	6.5%
Asian	118	1.3%
Black; African American	472	5.4%
White	6,503	74.1%
Middle Eastern; North African	16	0.2%
American Indian; Alaska Native	10	0.1%
Native Hawaiian; Other Pacific Islander	5	0.1%
Identified as Two or More Ethnicities	182	2.1%
Other Race or Ethnicity	90	1%
Declined to Answer	803	9.2%
Total	8,773	100%



Licensing Applications | July 9, 2020

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

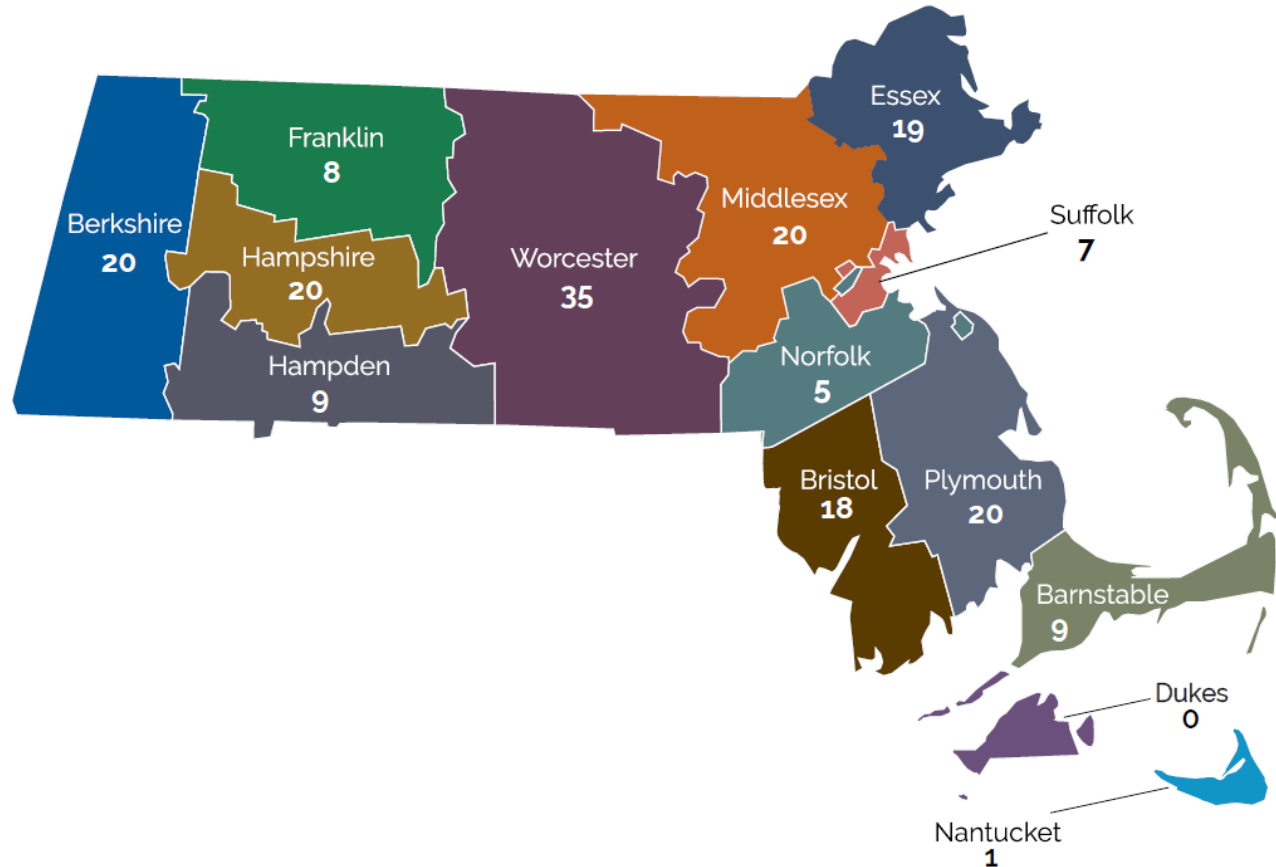
COUNTY	#	+/-
BARNSTABLE	12	+2
BERKSHIRE	42	+4
BRISTOL	42	+4
DUKES	0	
ESSEX	40	+4
FRANKLIN	25	+3
HAMPDEN	31	+7
HAMPSHIRE	36	+3
MIDDLESEX	57	+8
NANTUCKET	3	
NORFOLK	22	+5
PLYMOUTH	48	+7
SUFFOLK	11	
WORCESTER	108	+9
TOTAL	477	+56



Licensing Applications | July 9, 2020

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

COUNTY	#	+/-
BARNSTABLE	9	+1
BERKSHIRE	20	+1
BRISTOL	18	+4
DUKES	0	
ESSEX	19	+1
FRANKLIN	8	+1
HAMPDEN	9	+1
HAMPSHIRE	20	+1
MIDDLESEX	20	+3
NANTUCKET	1	
NORFOLK	5	
PLYMOUTH	20	+3
SUFFOLK	7	
WORCESTER	35	+3
TOTAL	191	+19+



Licensing Applications | July 9, 2020

TYPE	PENDING APPLICATION	PRE-CERTIFIED/ ENDORSEMENT	INITIAL LICENSE DENIED	PROVISIONALLY APPROVED	PROVISIONAL LICENSE	FINAL LICENSE	COMMENCE OPERATION	TOTAL
Craft Marijuana Cooperative	2	-	0	0	1	0	0	3
Delivery Pre-Certification	13	13	0	0	0	0	0	26
Independent Testing Laboratory	3	-	0	1	3	0	2	9
Marijuana Cultivator	97	-	2	17	86	12	31	245
Marijuana Microbusiness	6	-	0	4	6	0	2	18
Marijuana Product Manufacturer	72	-	1	15	65	8	27	188
Marijuana Research Facility	5	-	0	0	0	0	0	5
Marijuana Retailer	134	-	1	21	107	4	59	326
Marijuana Transporter with Other Existing ME License	2	-	0	2	1	0	2	7
Microbusiness Delivery	1	0	0	0	0	0	0	1
Third Party Transporter	6	-	0	0	0	1	0	7
Total	341	13	4	60	269	25	123	835

Adult Use Agent Applications | July 9 2020

14,702 Total Agent Applications:

- 215 Total Pending {
- 204 Pending Establishment Agents
 - 11 Pending Laboratory Agents
- 777 Withdrawn
 - 1,402 Incomplete
 - 217 Expired
 - 3,533 Surrendered
 - 8,558 Active

Of Total Pending:

- 81 not yet reviewed
- 126 CCC requested more information
- 8 awaiting third party response
- 0 Review complete; awaiting approval

MMJ Licensing Data | July 9, 2020

MTC License Applications	#
Pending-Application of Intent Stage	36
Pending-Management and Operations Profile Stage	8
Pending-Siting Profile Stage	8
Application Expired	103
Application Withdrawn	3
Total	158

MTC Licenses	#
Provisional	64
Final	13
Commence Operations	63
License Expired	25
Total	165

MMJ Agent and Program Data | July 9, 2020

MTC Agent Applications	#
Pending-MTC Agent Applications	16
Pending-Laboratory Agents	0
Revoked	3
Surrendered	2,481
Expired	583
Active	7,291
Total	10,374

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

MMJ Program	#
Certified Patients	88,053
Certified Active Patients	82,201
Active Caregivers	7,615
Registered Certifying Physicians	267
Registered Certifying Nurse Practitioners	81
Ounces Sold	66,828