

## **FOUR DAUGHTERS COMPASSIONATE CARE, INC.**

### **CHANGE OF LOCATION APPLICATION REVIEW**

1. Name and current address of the licensee:

Four Daughters Compassionate Care, Inc.  
1200 Providence Highway, Sharon, MA 02462

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:

2-4 Merchant Street, Sharon, MA 02067

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 June 19, 2018.

6. The municipal notice was sent on October 25, 2019. The Commission did not receive a municipal response from the municipality.

### **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 commence 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.

Change of Location Executive Summary 1



## **THE GREEN HARBOR DISPENSARY, LLC**

### **CHANGE OF LOCATION APPLICATION REVIEW**

1. Name and current address of the licensee:

The Green Harbor Dispensary, LLC.  
45 Court Street, Provincetown, MA 02657

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:

79 Shank Painter Road, Provincetown, MA 02657

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 November 30, 2018.
6. The municipal notice was sent on October 12, 2019. The Commission did not receive a municipal response from the municipality.

### **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 commence 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.

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## **EMERALD GROVE, INC.**

### **CHANGE OF LOCATION APPLICATION REVIEW**

1. Name and current address of the licensee:

Emerald Grove, Inc.  
3 Main Street Unit #20, Eastham, MA 02462

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:

3 Main Street Unit #1, Eastham, MA 02462

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 May 22, 2019.
6. The municipal notice was sent on September 12, 2019. The Commission did not receive a municipal response from the municipality.

### **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 commence 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.

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## **MEDICAL MARIJUANA TREATMENT CENTER RENEWALS**

### **EXECUTIVE SUMMARY**

**COMMISSION MEETING: JANUARY 16, 2020**

#### **RENEWAL OVERVIEW**

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

<b>Medical Marijuana Treatment Center Name</b>	<b>License Number</b>	<b>Location (Cultivation &amp; Processing)</b>	<b>Location (Dispensing)</b>
HVV MASSACHUSETTS, INC.	RMD-1405	GLOUCESTER	BOSTON

2. All licensees have submitted renewal applications pursuant to 935 CMR 501.100(5).
3. All licensees have paid the appropriate annual license fee.
4. The licensees, when applicable, have been inspected over the previous year. Commission staff certify that, to the best of our knowledge, no information has been found that would prevent renewal of the licenses mentioned above pursuant to 935 CMR 501.405.

#### **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.



## MARIJUANA ESTABLISHMENT RENEWALS

### EXECUTIVE SUMMARY

COMMISSION MEETING: JANUARY 16, 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
RISE HOLDINGS, INC	MP281453	MPR243506	HOLYOKE	\$0.00
RISE HOLDINGS, INC	MC281674	MCR139857	HOLYOKE	\$0.00
SANCTUARY MEDICINALS, LLC	MR281950	MRR205551	BROOKLINE	\$0.00
HERBOLOGY GROUP, INC	MR281814	MRR205557	GREENFIELD	\$0.00
MASS ALTERNATIVE CARE, INC.	MC281685	MCR139856	CHICOPEE	\$0.00
MASS ALTERNATIVE CARE, INC.	MP281468	MPR243505	CHICOPEE	\$0.00
MASS ALTERNATIVE CARE, INC.	MR281371	MRR205554	CHICOPEE	\$114,920.07
GARDEN REMEDIES INC.	MR281495	MRR205550	NEWTON	\$180,170.26
APOTHCA INC (FKA MA PATIENT FOUND)	MC281276	MCR139858	FITCHBURG	\$0.00
APOTHCA INC (FKA MA PATIENT FOUND)	MP281445	MPR243507	FITCHBURG	\$0.00
APOTHCA INC (FKA MA PATIENT FOUND)	MR281447	MRR205558	LYNN	\$60,231.18
PIONEER VALLEY EXTRACTS, LLC	MP281417	MPR243504	NORTHAMPTON	\$0.00
LDE HOLDINGS, LLC.	MR281689	MRR205553	WAREHAM	\$0.00
GARDEN REMEDIES INC	MR281942	MRR205559	MARLBOROUGH	\$479,031.00
URBAN GROWN INC.	MC281413	MCR139859	WHATELY	\$0.00

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IN GOOD HEALTH, INC.	MC281273	MCR139860	BROCKTON	\$110,873.73
IN GOOD HEALTH, INC.	MP281307	MPR243508	BROCKTON	\$110,873.73
NOVA FARMS, LLC F/K/A BCWC, LLC	MR281379	MRR205556	ATTLEBORO	\$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.
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.



**T. BEAR, INC.**  
MP281314

**ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

T. Bear, Inc.  
3103 Cranberry Highway, East Wareham, MA 02538

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

Product Manufacturing

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

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

**LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license type(s) on November 20, 2018.
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 licensee or the individuals and entities previously disclosed since the issuance of the provisional license(s).

**INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): December 6, 2019.

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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

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

Not applicable.





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.

**RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:

1. The licensee may possess, prepare, produce, and otherwise acquire marijuana, but shall not sell, or otherwise transport marijuana to other Marijuana Establishments, until upon inspection, receiving permission from the Commission to commence full operations;
2. The licensee is subject to inspection to ascertain compliance with Commission regulations;
3. The licensee remains suitable for licensure; 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.



## THEORY WELLNESS, INC.

MR281835

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Theory Wellness, Inc.  
672 Fuller Road, Chicopee, MA, 01020

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 1/Indoor	Commence Operations	Bridgewater
Cultivation, Tier 6/Outdoor	Final License	Sheffield
Product Manufacturing	Commence Operations	Bridgewater
Retail	Commence Operations	Great Barrington
MTC	Commence Operations	Bridgewater
MTC	Commence Operations	Great Barrington
MTC	Application Submitted	Not Disclosed Yet

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license type(s) on May 30, 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).

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7. No new information has been discovered by Commission staff regarding the suitability of the licensee or the individuals and entities 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): October 30, 2019 and November 13, 2019.
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

Transportation activities occur from the licensee's Bridgewater location. The licensee's vehicle and transportation policies were previously inspected.

## **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.



## NATURE'S REMEDY OF MASSACHUSETTS, LLC

RMD1285

### **ESTABLISHMENT OVERVIEW**

1. Name of the Medical Marijuana Treatment Center:

Nature's Remedy of Massachusetts, LLC

2. Address(es) of Medical Marijuana Treatment Center:

Cultivation: 310 Kenneth Welch Drive, Lakeville, MA 02347

Product Manufacturing: 310 Kenneth Welch Drive, Lakeville, MA 02347

Dispensary: 266 North Main Street, Millbury, MA 01527

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

Type	Status	Location
MTC	Provisional License	Falmouth
MTC	Provisional License	Acton
Cultivation, Tier 4/Indoor	Commence Operations	Lakeville
Product Manufacturer	Final License	Lakeville
Retail	Commence Operations	Millbury
Retail	Provisional License	Rowley
Retail	Provisional License	Tyngsborough

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure on November 18, 2016.
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.

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7. No new information has been discovered by Commission staff regarding the suitability of the licensee or the individuals and entities previously disclosed since the issuance of the provisional license.

## **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facilities on the following date(s): December 5, 2019 and December 11, 2019.
9. 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.
10. 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 codes, bylaws, laws, ordinances, and regulations.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

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

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



d. Product Manufacturing Operation

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

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

e. 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.

## **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; and
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.



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.





## REVOLUTIONARY CLINICS II

RMD1346

### ESTABLISHMENT OVERVIEW

1. Name of the Medical Marijuana Treatment Center:

Revolutionary Clinics II

2. Address(es) of Medical Marijuana Treatment Center:

Cultivation: 1 Oak Hill Road, Fitchburg, MA 02140

Product Manufacturing: 1 Oak Hill Road, Fitchburg, MA 02140

Dispensary: 541 Massachusetts Avenue, Cambridge, MA 02139

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

Type	Status	Location
MTC	Commence Operations	Cambridge
MTC	Commence Operations	Somerville
Cultivation, Tier 8/Indoor	Commence Operations	Fitchburg
Product Manufacturing	Commence Operations	Fitchburg

### LICENSING OVERVIEW

4. The licensee was approved for provisional licensure on June 2, 2017. The cultivation and product manufacturing facility were previously approved to commence operations in association with the other two (2) MTC licenses.
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.
7. No new information has been discovered by Commission staff regarding the suitability of the licensee or the individuals and entities previously disclosed since the issuance of the provisional license.

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## **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): October 23, 2019 and November 6, 2019.
9. 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.
10. 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 codes, bylaws, laws, ordinances, and regulations.
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

The cultivation facility was previously inspected and approved to commence operations.

- d. Product Manufacturing Operation

The product manufacturing facility was previously inspected and approved to commence operations.



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

Transportation activities occur from the licensee's Fitchburg facility.

## **RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:

1. The licensee may continue to cultivate, harvest, possess, prepare, produce, transport, and wholesale marijuana to other Medical Marijuana Treatment Centers subject to Commission regulations, but shall not dispense marijuana 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; and
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.

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.



## **SOLAR THERAPEUTICS, INC.**

RMD1205

### **ESTABLISHMENT OVERVIEW**

1. Name of the Medical Marijuana Treatment Center:

Solar Therapeutics, Inc.

2. Address(es) of Medical Marijuana Treatment Center:

Cultivation: 1400 Brayton Point Road, Somerset, MA 02725

Product Manufacturing: 1400 Brayton Point Road, Somerset, MA 02725

Dispensary: 1400 Brayton Point Road, Somerset, MA 02725

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

Type	Status	Location
Cultivation, Tier/5	Final License	Somerset
Product Manufacturing	Provisional License	Somerset
Retail	Commence Operations	Somerset
Retail	Application Submitted	Seekonk

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure on July 12, 2018.
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.
7. No new information has been discovered by Commission staff regarding the suitability of the licensee or the individuals and entities previously disclosed since the issuance of the provisional license.

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## **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): September 25, 2019, October 1, 2019, and December 27, 2019.
9. 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.
10. 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 codes, bylaws, laws, ordinances, and regulations.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

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

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

- d. Product Manufacturing Operation



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

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

e. 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

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 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; and
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.

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.

### **BACKGROUND & APPLICATION REVIEW**

1. Name of the proposed Medical Marijuana Treatment Center:

Pharmacannis Massachusetts, Inc.

2. Address(es) of Medical Marijuana Treatment Center Operations:

Cultivation: 465 Hopping Brook Road, Holliston, MA 01746

Product Manufacturing: 465 Hopping Brook Road, Holliston, MA 01746

Dispensary: 164 Grove Street, Franklin, MA 02038

3. Applicant is a licensee or applicant for other Medical Marijuana Treatment Center(s):

Type	Status	Location
MTC	Commence Operations	Wareham
Retail	Commence Operations	Wareham
Retail	Application Submitted	Shrewsbury
Cultivation, Tier 7/Indoor	Application Submitted	Holliston

4. List of all required individuals and their business roles in the Medical Marijuana Treatment Center:

Individual	Role
Michelle Stormo	Director
Jeremy Unruh	Director
Theodore Scott	Executive
Kimberly Evans	Executive
Michael Chodil	Executive
Brendon Hershey	Director
Holly Carroll	Manager



5. List of all required entities and their roles in the Medical Marijuana Treatment Center:

Entity	Role
Pharmacann Mass, LLC	Capital Contributor
Pharmacann, LLC	Capital Contributor

6. Applicant's information pertaining to co-located operations:

This location will not currently be co-located with an adult-use establishment.

7. The applicant executed a Host Community Agreements with the Town of Franklin on May 17, 2018 and the Town of Holliston on December 10, 2018.
8. The Commission received a municipal response from Franklin on December 16, 2019 and Holliston on December 17, 2019 stating the applicant was in compliance with all local ordinances and bylaws.

### **SUITABILITY REVIEW**

9. There were no concerns arising from background checks on the individuals or entities associated with the application.
10. There were no disclosures of any past civil or criminal actions, or occupational license issues.

### **MANAGEMENT AND OPERATIONS REVIEW**

11. The applicant states that it can be operational by January 1, 2021.
12. The applicant was not required to submit proposed hours of operation. Commission staff will obtain this information during the inspectional phase.
13. The applicant submitted all applicable and required summaries of procedures for the operation of the proposed Medical Marijuana Treatment Center. The summaries were determined to be substantially compliant with the Commission's regulations.
14. The applicant submitted a summary of its plan for providing patient education materials. The plan is compliant with the Commission's regulations.
15. The applicant disclosed that it plans to perform home deliveries to registered patients. The summary of the applicant's plan is consistent with the Commission regulations and guidance documents.
16. Summary of cultivation plan:

2





The applicant submitted a summary of a cultivation plan that demonstrated the ability to comply with the regulations of the Commission.

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

- a. Oils
- b. Butters;
- c. Bars;
- d. Capsules
- e. Tablets;
- f. Sublingual tincture;
- g. Shatters;
- h. Waxes; and
- i. Vaporizer Cartridges.

**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.



**ALCHEMY LEAGUE**  
MRN281275

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Alchemy League  
1 Cabot Street, Holyoke, MA 01013

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

Retail

The application was reopened more than four (4) 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
Leah Daniels	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:

Economic Empowerment Applicant

7. The applicant and municipality executed a Host Community Agreement on July 29, 2019.

Provisional License Executive Summary 1



8. The applicant conducted a community outreach meeting on August 2, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on October 8, 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	Reduce barriers to entry in the commercial adult-use cannabis industry among those with previous drug convictions and those whose parents or spouses have drug convictions, other Economic Empowerment priority applicants, and Social Equity Program participants in Holyoke and surrounding areas
2	Provide mentoring, professional, and technical services for individuals and businesses in Holyoke and surrounding areas that face systemic barriers to entry and success in the cannabis industry due to their previous drug convictions and/or their status as economic empowerment or social equity program participants.

### **SUITABILITY REVIEW**

11. There were disclosures of 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 – Friday: 8:00 a.m. – 8:00 p.m.  
Saturday: 10:00 a.m. – 8:00 p.m.  
Sunday: 12:00 p.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:

2



#	Goal
1	Ensure that at least 25% of hires during the first year are members of one or more of the following demographics: minorities, women, veterans, people with disabilities, people of all gender identities and sexual orientations.
2	Provide quarterly trainings to minorities, women, veterans, people with disabilities, people of all gender identities and sexual orientations to promote their entry into the industry.

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 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.



**CTDW, LLC**  
MRN281844

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

CTDW, LLC  
3 Dodge Street, Salem, MA 01970

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
Paul Tuttle	Executive / Officer
Donald Wyse	Executive / Officer

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

Entity	Role
CTDW Holdings, Inc.	Parent Company

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on December 20, 2018.

Provisional License Executive Summary 1



8. The applicant conducted a community outreach meeting on August 13, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on November 4, 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	Give hiring preferences to individuals who reside in Chelsea, Lynn, and Revere and/or who have past drug convictions and/or parents or spouses with drug convictions.
2	Publicize and host two (2) job fairs in Lynn and one (1) in Revere.
3	Donate \$25,000 on an annual basis to North Shore Community Development Coalition.

### **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.
14. The applicant's proposed hours of operation are the following:  
  
Monday – Thursday: 10:00 a.m. – 9:30 p.m.  
Friday – Saturday: 10:00 a.m. – 10:00 p.m.  
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
---	------



<b>1</b>	Hire 25% of minorities, 50% of women, 5-10% of individuals with disabilities, 5-10% of veterans, and at least 25% of LGBTQ+ individuals.
<b>2</b>	Participate in three (3) job fairs.
<b>3</b>	Partner with North Shore Community Development Coalition's Youth Build program in order to identify potential candidates (21 years of age or older) for its internship program.

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 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.



## ELEV8 CANNABIS INC.

MRN281383

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Elev8 Cannabis Inc.  
14 South Main Street, Orange, MA 01364

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

Retail

The application was reopened more than four (4) 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	Athol
Retail	Application Submitted	Williamstown

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

Individual	Role
Oluwaseun Adedeji	Executive
Katherine Long	Executive

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

Entity	Role
SSZ Real Estate Holding LLC	Investor

6. Applicant's priority status:

General Applicant

Provisional License Executive Summary 1





7. The applicant and municipality executed a Host Community Agreement on November 1, 2018.
8. The applicant conducted a community outreach meeting on February 14, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on December 5, 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	Elev8 intends to host quarterly educational seminars that are designed to empower individuals that work or reside within areas of disproportionate impact with skills training relative to the cannabis industry.

### **SUITABILITY REVIEW**

11. There were 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: 9:00 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:

#	Goal
1	Increasing the percentage of individuals who are minorities, women, veterans, LGBTQ+, and people with disabilities working in the establishment to 50%.
2	Providing and quantifying tools to ensure the success of individuals who are minorities, women, veterans, LGBTQ+, and people with disabilities.

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):

Elev8 plans to purchase marijuana and marijuana products from those entities licensed to cultivate and manufacture marijuana and marijuana products under 935 CMR 500.000.

### **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.



## ELEV8 CANNABIS, LLC

MRN281810

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Elev8 Cannabis, LLC  
243 Main Street, Athol, MA 01331

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

Retail

The application was reopened more than four (4) 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	Orange
Retail	Application Submitted	Williamstown

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

Individual	Role
Oluwaseun Adedeji	Executive
Katherine Long	Executive

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

Entity	Role
SSZ Real Estate Holding LLC	Investor

6. Applicant's priority status:

General Applicant

Provisional License Executive Summary 1



7. The applicant and municipality executed a Host Community Agreement on August 7, 2018.
8. The applicant conducted a community outreach meeting on May 3, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on December 2, 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	Elev8 intends to host quarterly educational seminars that are designed to empower individuals that work or reside within areas of disproportionate impact with skills training relative to the cannabis industry.

### **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.
14. The applicant's proposed hours of operation are the following:  
  
Monday – Saturday: 10:00 a.m. – 8:00 p.m.  
Sunday: 12:00 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	Increasing the percentage of individuals who are minorities, women, veterans, LGBTQ+, and people with disabilities working in the establishment to 50%.
2	Providing and quantifying tools to ensure the success of individuals who are minorities, women, veterans, LGBTQ+, and people with disabilities.

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):

Elev8 plans to purchase marijuana and marijuana products from those entities licensed to cultivate and manufacture marijuana and marijuana products under 935 CMR 500.000

### **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.



## ELEV8 CANNABIS INC.

MRN282630

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Elev8 Cannabis Inc.  
217 Main Street, Williamstown, MA 01267

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

Retail

The application was reopened more than four (4) 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	Athol
Retail	Application Submitted	Orange

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

Individual	Role
Oluwaseun Adedeji	Executive
Katherine Long	Executive

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

Entity	Role
SSZ Real Estate Holding LLC	Investor

6. Applicant's priority status:

General Applicant

Provisional License Executive Summary 1



7. The applicant and municipality executed a Host Community Agreement on March 25, 2019.
8. The applicant conducted a community outreach meeting on February 15, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on January 2, 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	Elev8 intends to host quarterly educational seminars that are designed to empower individuals that work or reside within areas of disproportionate impact with skills training relative to the cannabis industry.

### **SUITABILITY REVIEW**

11. There were 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.
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. – 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	Increasing the percentage of individuals who are minorities, women, veterans, LGBTQ+, and people with disabilities working in the establishment to 50%.
2	Providing and quantifying tools to ensure the success of individuals who are minorities, women, veterans, LGBTQ+, and people 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):

Elev8 plans to purchase marijuana and marijuana products from those entities licensed to cultivate and manufacture marijuana and marijuana products under 935 CMR 500.000

### **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.





Supplier for store names, buildouts and store formats, uniforms and merchandising, IT tech support and in-store technology, human resources services such as training and recruitment, general oversight and business consulting.”<sup>4</sup>

2. Right of First Refusal (“ROFR”) Option. Elev8 must present TILT with an offer on the same terms as any bona fide offer tendered to Elev8 to purchase an interest constituting a change in control. The agreement recognizes that the ROFR Option may only be exercised if the Massachusetts state marijuana laws and regulations are amended to remove existing ownership limits.<sup>5</sup>
3. Right of First Refusal (“ROFR”) Debt/Equity Financing. In addition to the ROFR Option for purchase of equity, the ROFR agreement contains provisions prohibiting Elev8 from seeking any debt or equity financing to support opening a new retail store without first presenting TILT the opportunity to provide financing on substantially the same terms. Although the ROFR on debt and financing appears in the ROFR agreement, it is expressly distinguished from the “ROFR Option” for equity purchase and effective upon execution.
4. Loan prepayment. Elev8 must annually prepay 70% of any excess cash flow to TILT in repayment of a one million dollar loan at eight percent interest. TILT’s obligations under the loan are conditioned on the Supply Agreement and ROFR Agreement remaining in full force and effect.<sup>6</sup>
5. Mortgage and Security Agreement. TILT’s loan was secured against Elev8’s assets and real estate through a mortgage and security agreement.<sup>7</sup>

On July 25, 2019, TILT attended an Investigative Conference and informed Commission staff that TILT intended to terminate its management agreement arrangements with affiliated licensees, including Elev8, dissolve defunct subsidiaries and negotiate traditional loan financing arrangement with those affiliate licensees. On August 16, 2019, counsel for TILT memorialized their planned actions as discussed at the Investigative Conference.<sup>8</sup>

On October 5, 2019, Elev8 amended its application to include an executed Termination, Settlement and Release Agreement and executed loan agreement (“restructured agreements”).<sup>9</sup>

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<sup>4</sup> Exhibit D (TILT and Elev8 Supply Agreement, dated December 18, 2019).

<sup>5</sup> Exhibit E (Right of First Refusal Agreement (Elev8), dated January 11, 2019).

<sup>6</sup> Exhibit F (Loan and Security Agreement, dated January 11, 2019). See Section 4.1(i): *Conditions Precedent to Loans* (“The obligation of Lender to make advances hereunder is subject to the satisfaction of, or waiver of, immediately prior to or concurrently with the making of such Loan of each of the following conditions precedent . . . Each of the Supply Agreement and ROFR Agreement shall have been duly executed by the parties thereto and is in full force and effect and no breach by the Borrower or its stockholders shall have occurred under such agreement); and Section 9.7: *Sale of Assets, Consolidation, Merger, Dissolution, Other Prohibited Activities* (“Borrower shall not, directly or indirectly, without Lender’s consent . . . terminate or breach the Supply Agreement or ROFR Agreement.”).

<sup>7</sup> Exhibit G (Mortgage and Security Agreement, dated January 11, 2019) and Exhibit H (Secured Promissory Note dated January 11, 2019)

<sup>8</sup> Exhibit H (“CAC Updates” email from Adam Fine, dated August 16, 2019).

<sup>9</sup> Exhibit I (Loan Agreement by and among Elev8 Cannabis LLC and SH Finance Company, dated September 23, 2019); and Exhibit K (Termination Release and Settlement Agreement, dated September 23, 2019).



On October 28, 2019, Elev8 recorded a discharge and release of the mortgage and security agreement interest.<sup>10</sup>

The restructured agreements release all obligations pertaining to supply, rights of first refusal, cash flow sweep loan repayment and any secured interest in Elev8's real estate interests.

## **2. Investigation Outcome**

The MOU Agreements between TILT and Elev8 established an interest that subject to disclosure on Elev8's initial application for licensure. However, Elev8 has since terminated the MOU Agreements and properly disclosed newly-executed traditional loan arrangements.

Prior to termination of the MOU Agreements, TILT exercised decision-making authority over management and operational decisions. TILT controlled at least 70% of the inventory Elev8 could offer and established a per-item revenue sharing arrangement. TILT held a Right of First Refusal over any offering Elev8 sought for debt or equity financing. Elev8 could not freely choose to cancel or renegotiate these arrangements because TILT's provision of capital under the loan agreement was expressly contingent on Elev8's agreement and adherence to the supply and right of first refusal agreement. Further default on the loan could impact Elev8's real property which was subject to a mortgage and security agreement in connection with the TILT loan.

Based on review of the restructured agreements, there is no evidence that TILT currently holds a controlling interest in Elev8. TILT and Elev8 have complied with all requests for information put forward by Commission staff and has promptly amended its application with new capital information. Accordingly, the ownership and control investigation pertaining to Elev8 is deemed closed.

## **3. Licensing Recommendation**

An application for licensure may be denied based on the submission of misleading, incorrect, false or fraudulent information to the Commission. 935 CMR 500.400(2). The newly promulgated regulations revise this provision to further clarify the standard as submission of information that "was deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly, or by omission or ambiguity." Enforcement does not find that the investigation results support a finding that Elev8 submitted misleading, incorrect, false or fraudulent information to the Commission.

First, failure to disclose TILT's interest is moot given the termination, settlement and release of the contractual agreements.

Second, any past failure to disclose an interest on the application was not intentional or bad-faith. At the time Elev8 submitted its application and responded to the Commission's RFI, it had an obligation to disclose close associates and other persons or entities having direct or indirect

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<sup>10</sup> Exhibit K (Discharge of Mortgage, Absolute Assignment of Rents and Leases, Security Agreement and Fixture Filing, recorded in Worcester Registry of Deeds at Book 61309 and Page 393 on October 28, 2019).



authority over Elev8's management, policies, security operations or cultivation operations. 935 CMR 500.101(1)(a). During this time, TILT submitted applications for its wholly-owned subsidiary Commonwealth Alternative Care which lack disclosure of an interest in Elev8 or any other control affiliates. TILT held contractual interests similar to the Elev8 agreements with multiple other control affiliates (i.e. Herbology Group, Verdant, Ermont). None of the other control affiliates disclosed any interest held by TILT on their respective agreements. There is no TILT expressly directed control affiliates to omit reference to their controlling interest as to not negatively affect their wholly-owned subsidiary's licensing efforts. Regardless of express direction, TILT provided management and operational assistance to its control affiliates. Elev8 could have reasonably looked to TILT's application disclosures as implicit guidance on how to proceed with their own application.

There is insufficient evidence to support a finding that Elev8 acted in a deceiving manner warranting staff recommendation to deny licensure pursuant to 935 CMR 500.400(2).

#### **4. Conclusion**

Elev8 has provided all requested and required documentation to demonstrate termination of contractual arrangements with TILT that would otherwise have established direct or indirect control. The Director of Investigations has determined that no further investigative steps are necessary or appropriate at this time. The Director of Licensing has reviewed the investigative material in consultation with Enforcement Counsel and does not find any grounds warranting staff recommendation to deny licensure. Accordingly, this memorandum recommends that the Chief of Investigations and Enforcement deem this investigation closed.



**ELEVATED GARDENS, LLC**  
MCN281448

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Elevated Gardens, LLC  
17 Taconic Park Drive, Pittsfield, MA 01201

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 four (4) 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
Christopher Fazio	Executive / Officer
Angela Fazio	Capital Contributor

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

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

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on August 10, 2018.

Provisional License Executive Summary 1



8. The applicant conducted a community outreach meeting on June 13, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on November 8, 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	Give hiring preference to 25% of individuals who reside in Pittsfield as well as North Adams.
2	Donate \$5,000 to the Cannabis Community Care and Research Network on an annual basis.

### **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.
14. The applicant's proposed hours of operation are the following:  
  
Monday – Saturday: 9:00 a.m. – 8:00 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	Hire 25% of individuals 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):

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.



## FIDELITY WELLNESS CENTER, INC.

MRN282801

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Fidelity Wellness Center, Inc.  
256 Weymouth Street, Rockland, MA 02370

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
MTC	Provisional License	Holyoke

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

Individual	Role
Mario Chiuccariello	Owner / Partner
Ricardo Veiga	Executive / Officer

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

Entity	Role
MJ Management Services, Inc.	Landlord

6. Applicant's priority status:

MTC Priority Applicant

7. The applicant and municipality executed a Host Community Agreement on July 3, 2019.  
Provisional License Executive Summary 1



8. The applicant conducted a community outreach meeting on April 17, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on December 5, 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	Hire 25% of individuals who reside in Abington and Braintree.
2	Source 20% of contractors, suppliers, and vendors from Abington and Braintree.

### **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 two (2) months of receiving the provisional license.
14. The applicant's proposed hours of operation are the following:  
  
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	Hire 50% of women and 30% of minorities, veterans, and people 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):

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; 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 RAILROAD GROUP, INC.

MRN281745

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Green Railroad Group, Inc.  
82 Railroad Street, Great Barrington, MA 01230

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

Retail

The application was reopened more than four (4) 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
Paul Aronofsky	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 September 24, 2018.

Provisional License Executive Summary 1



8. The applicant conducted a community outreach meeting on September 27, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Great Barrington on November 4, 2019. 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 30% of individuals from Pittsfield.
2	Donate \$5,000 to the Commission's Social Equity Training and Technical Assistance Fund on an annual basis.
3	Partner with at least 25% of its suppliers, contractors and wholesale partners from 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. 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: 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	Recruit and hire a diverse group of employees with a goal of hiring at least 50% women and 25% minorities, LGBTQ, veterans and persons with disabilities.
2	Create an inclusive, safe and respectful work environment



<b>3</b>	Prioritize contracting with supply chain and ancillary service providers that are committed to the same goals of promoting equity and diversity in the adult-use marijuana industry.
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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):

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; 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.



## HAMPSHIRE HEMP, LLC

MRN281867

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Hampshire Hemp, LLC  
371 – 391 Damon Road, 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 four (4) 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
Peter Picknelly	Board Member
Mark Cutting	Manager
Nicholas Yee	Manager

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

Entity	Role
Hampshire Management, LLC	Capital Contributor

6. Applicant's priority status:

General Applicant

Provisional License Executive Summary 1



7. The applicant and municipality executed a Host Community Agreement on November 6, 2019.
8. The applicant conducted a community outreach meeting on October 31, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on November 6, 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	Recruit and hire 50% of individuals who are residents of Holyoke and Springfield, 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	Donate \$5,000, provide eight (8) hours of community service, and hold at least four (4) food drives on an annual basis to Margaret's Pantry.

### **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 two (2) months of receiving the provisional license.
14. The applicant's proposed hours of operation are the following:  
  
Monday – Saturday: 10:00 a.m. – 6:00 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
---	------

2



<b>1</b>	Hire and Recruit 50% of woman and 30% of minorities, people who identify as LGBTQ/Alternative Sexual Identities, veterans and people with disabilities.
<b>2</b>	Purchase 20% of goods and services from vendors, contractors, and professional service providers that are owned and operated by individuals that have cultural and ethnically diverse characteristics.

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 and when, they are approved. 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; 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.



**IPSWICH PHARMACEUTICAL ASSOCIATES, INC.**  
MCN281749

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Ipswich Pharmaceutical Associates, Inc.  
O Bullards Crossing Road, Hinsdale, MA 01235

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

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

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
Retail	Provisional License	Rowley
MTC	Provisional License	Rowley

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

Individual	Role
Joseph McCarthy	Executive / Officer
Elizabeth McCarthy	Executive / Officer
Henry Zachs	Close Associate
Benjamin Zachs	Close Associate

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

Entity	Role
ZAFA XXV, LLC	Entity with Direct or Indirect Authority

Provisional License Executive Summary 1





6. Applicant's priority status:  
MTC Priority Applicant
7. The applicant and municipality executed a Host Community Agreement on April 11, 2018.
8. The applicant conducted a community outreach meeting on April 10, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the Town of Hinsdale on November 1, 2019. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Host a job fair once a year in Haverhill and Pittsfield
2	Donate \$5,000 to 24 Hr. Power, Inc.
3	Co-Host an annual Silent Auction Night with 24 Hr. Power, Inc. to support Massachusetts residents recovering from opioid addiction.

### **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.
14. The applicant's proposed hours of operation are the following:  
Monday – Sunday: 6:00 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
---	------

2



1	Hire and recruit 30% of diverse individuals for its hiring initiative.
2	Provide cultural training on cultural sensitivity and recognizing unconscious bias at least two (2) times per year.

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.



**JOLLY GREEN, INC.**  
MCN281283

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Jolly Green, Inc.  
60 Franklin Street, Winchendon, MA 01475

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

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

The application was reopened more than four (4) 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
Kyle Higgins	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, 2019.

Provisional License Executive Summary 1



8. The applicant conducted a community outreach meeting on January 14, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on November 4, 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	Hire and recruit individuals from Fitchburg and Worcester.
2	Contract 50% of its vendors from Fitchburg and Worcester.

### **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.
14. The applicant's proposed hours of operation are the following:  
  
Monday – Sunday: 7:00 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	Hire one (1) individual that is a minority, woman, veteran, person with disabilities, and/ or a person of all gender identities and sexual orientation per year.
2	Contract with 50% or more vendors that are owned by minorities, woman, veterans, people with disabilities, and/or people of all gender identities and sexual orientations.

17. Summary of cultivation plan (if applicable):

2



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.



## LDE HOLDINGS, LLC

MPN281436

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

LDE Holdings, LLC  
6 Thatcher Lane, Wareham, MA 02571

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

Product Manufacturer

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

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

Type	Status	Location
Cultivation – Tier 2 / Indoor	Provisional License	Wareham
Retail	Provisional License	Wareham

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

Individual	Role
Jesse Pitts	Owner / Partner
Carl Giannone	Owner / Partner
Billie Giannone	Owner / Partner
Lei Feng	Owner / Partner

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

Entity	Role
Toria Group LLC	Investor

6. Applicant's priority status:

Provisional License Executive Summary 1



## General Applicant

7. The applicant and municipality executed a Host Community Agreement on June 21, 2018.
8. The applicant conducted a community outreach meeting on April 26, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality November 4, 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	Hire 25% of individuals who reside in an area of disproportionate impact.
2	Donate \$500 to six (6) local charities.
3	Host two career fairs (one each in Wareham and New Bedford).
4	Host two career seminars (one each in Wareham and New Bedford).

## **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 eight (8) months of receiving the provisional license.
14. The applicant's proposed hours of operation are the following:  
  
Monday – Sunday: 6:00 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
---	------

2



<b>1</b>	Employ a workforce that is at least 40% composed of minorities, women, veterans, people with disabilities and LGBTQIA+ individuals.
<b>2</b>	Host two career fairs (one each in Wareham and New Bedford).
<b>3</b>	Perform at least one staff survey to solicit feedback from employees for increasing diversity and inclusion within the company.
<b>4</b>	Confirm that all managers have completed CTG's "Diversity & Sensitivity in the Workplace for Supervisors" module.

17. Summary of cultivation plan (if applicable):

Not Applicable.

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

#	Product
1	Concentrates
2	Oils
3	Shatter
4	Waxes
5	Live Resin
6	Terpene Profiles
7	High Terpene Full Spectrum Extract
8	High Cannabinoid Full Spectrum Extract
9	Distillate
10	Isolates
11	Vapor Cartridges
12	Tinctures
13	Capsules
14	Cooking Oils
15	Topical Salves

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

3





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 DIA**  
MRN281269

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

New Dia  
118 Cambridge Street, Worcester, MA 01603

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
Ross Bradshaw	Owner / Partner
Amanda Bradshaw	Owner / Partner
Shanel Lindsay	Owner / Partner
Susan Lindsay	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:

Economic Empowerment Applicant

Provisional License Executive Summary 1



7. The applicant and municipality executed a Host Community Agreement on April 24, 2019.
8. The applicant conducted a community outreach meeting on August 12, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City of Worcester on November 4, 2019. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Hosting at least four (4) company-sponsored community cleanups each year in South Worcester.
3	Host one (1) annual free educational workshops within the South Worcester community to educate and inform residents, parents, coaches, and other community stakeholders of responsible marijuana use, the legalities of recreational marijuana, and equity mandates with state regulations.
4	Host one (1) annual free resume workshop within the South Worcester community to assist individuals (21 and over) with creating resumes for employment.
5	Maintain at least 75% of employment from people residing in Worcester areas disproportionately impacted.

### **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.
14. The applicant's proposed hours of operation are the following:  
  
Monday – Saturday: 10:00 a.m. – 10:00 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	75% percentage of staff shall be minorities, women, veterans, and persons with disabilities.
2	Host one (1) annual free workshop within the community to assist minorities, women, veterans, persons with disabilities, and LGBTQ+ with creating resumes, cover letters, and references for entering the adult-use marijuana industry.
3	Assist three (3) individuals that are either a minority, woman, veteran, or a person with disabilities, successfully apply for the Social Equity Program.

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 Día will obtain wholesale marijuana and marijuana products from licensed marijuana cultivators and product manufacturers.

## **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.



**ROARING GLEN FARMS, LLC**  
CON281373

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Roaring Glen Farms, LLC  
40 Whately Glen Road, Conway, MA 01341

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

Craft Marijuana Cooperative (Tier 11/Outdoor (90,001 – 100,000 sq. ft))

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
Lisa Gustavsen	Owner / Partner
John Moore	Owner / Partner
Matthew Martin	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 March 18, 2019.  
Provisional License Executive Summary 1



8. The applicant conducted a community outreach meeting on March 1, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on November 18, 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	The applicant will actively recruit, hire, and train 20% of staff that are residents from nearby areas of disproportionate impact within the first year of obtaining a provisional license.
2	The applicant will purchase 10% of materials, supplies, or services from businesses located in and owned by residents in areas of disproportionate impact (e.g., towns of Greenfield, Amherst, West Springfield, etc.)

### **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.
14. The applicant's proposed hours of operation are the following:  
  
Monday – Sunday: 6:00 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	The applicant will actively recruit potential staff by attending at least 2 events organized by veteran groups (e.g., Weed for Warriors, New England Veteran Alliance (NEVA), etc.)



2	The applicant will employ 20% of staff from veteran and women demographic groups within one year of the issuance of a provisional license.
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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):

The applicant will only be performing cultivation operations at this facility at this time.

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.



## ROYALSTON FARMS, LLC

MCN281430

MPN281544

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Royalston Farms, LLC  
130 South Royalston Road, Royalston, MA 01368

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 to 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):

Type	Status	Location
Cultivation – Tier 3/Indoor (10,001 to 20,000 sq. ft.)	Application Submitted	Templeton
Product Manufacturing	Application Submitted	Templeton

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

Individual	Role
Damon Schmidt	Director
Mark Vlachos	Director
Ronald Baldwin	Manager
Jordan Willetts	Board Member

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 January 8, 2019.
8. The applicant conducted a community outreach meeting on November 15, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on December 19, 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	Train, mentor, and help launch a new marijuana business for a minimum of one (1) Social Equity participant and one (1) Economic Empowerment priority applicant.

### **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 one (1) month of receiving the provisional license.
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:

2



#	Goal
1	Hire 50% of individuals falling into the demographics of minorities, women, veterans, people with disabilities and those falling under LGBTQ.
2	Provide mentoring and professional training to the company employees who are minorities, veterans, persons with disabilities, and 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	Bubble Hash
2	Rosin

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.



## TETRAMED LLC

MCN281611

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

TetraMed LLC  
85 Winter Street, Gardner, MA 01440

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

Cultivation – Tier 4 / Indoor (20,001 – 30,000 sq. ft)

The application was reopened four (4) 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
Michael Brickey	Executive
Matthew Elam	Executive
James Dunn	Head of Cultivation
Eric Canestrari	Executive
James Delbonis	Close Associate
Ryan Winmill	Close Associate

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

Entity	Role
The Winmill Group	Security Services – Independent Contractor

6. Applicant's priority status:

Provisional License Executive Summary 1



## General Applicant

7. The applicant and municipality executed a Host Community Agreement on August 21, 2018.
8. The applicant conducted a community outreach meeting on July 30, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on November 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	TetraMed will endeavor to maintain a workforce consisting of not less than 15% of individuals that have endured disproportionate cannabis-related law enforcement or employment impacts.
2	TetraMed will provide financial contributions to non-profit and community--based organizations within Gardner and Fitchburg.
3	TetraMed will conduct industry-specific information and career fairs twice annually in and around Gardner and Fitchburg.

## **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 one (1) year of receiving the provisional license.
14. The applicant's proposed hours of operation are the following:  
  
Monday – Sunday: Open 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	TetraMed's workforce will be comprised of at least 20% of individuals who are African-American/Black and/or Hispanic or Latino descent, women, and veterans.
2	Promote a diverse management and executive team.
3	Seek out and contract with a minimum of 15% qualified, diverse vendors and contractors.

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 HEADYCO LLC**  
MCN281292

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

The Headyco LLC  
4 Lachance Street, Gardner, MA 01440

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 to 10,000 sq. ft.)

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

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

Type	Status	Location
Product Manufacturing	Application Submitted	Gardner

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

Individual	Role
Danielle Daly	Owner
Nak Chung	Person with Direct or Indirect Control

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

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

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on July 8, 2019.  
Provisional License Executive Summary 1



8. The applicant conducted a community outreach meeting on July 1, 2019 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on November 4, 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	Headyco will look to target >5% of new employees that have past drug convictions or have 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 three (3) months of receiving the provisional license.
14. The applicant's proposed hours of operation are the following:  
  
Open 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	Headyco will have a goal of >20% of all employees from Commission-approved areas of diversity.

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.





## Two Buds, LLC

MCN281702

MPN281506

MRN281959

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Two Buds, LLC  
53 Air Station Industrial Park, Rockland, MA 02370

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):

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
David Crowley	Owner
Grover Daniels	Owner
Christopher LeBlanc	Manager
Eliot Keele	Capital Contributor
Kathryn Keele	Capital Contributor

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

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

Provisional License Executive Summary 1



6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on September 4, 2018.
8. The applicant conducted a community outreach meeting on October 29, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on December 5, 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	Two Buds, LLC will provide at least ten (10) hours of billable pro bono legal services each month to qualified residents of Abington, Braintree, Brockton, Randolph, Quincy, and Mission Hill (Boston).
2	Conduct quarterly workshops to educate registered attendees who reside in the Boston community.
3	Hire 20% of its employees who are residents of Abington, Braintree, Brockton, Randolph, Quincy, and Mission Hill (Boston).
4	Establish a management training program to provide training and experience in the cannabis industry for up to 3 qualified candidates each 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 licenses.
14. The applicant's proposed hours of operation are the following:

Monday – Sunday: 8:00 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	Two Buds shall hire 50% of its staff from Commission-approved areas of diversity.

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	Sublingual Tinctures
2	Topicals
3	Gels
4	Lotions
5	Salves
6	Balms
7	Concentrates
8	Oils
9	Rosin
10	Wax
11	Shatter
12	Bubble Hash
13	Vape Pen Cartridges

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

Two Buds, LLC plans to market and sell marijuana and marijuana products produced by its own cultivation and product manufacture licenses. In the event Two Buds, LLC is unable to do so, they will purchase marijuana and marijuana products only from Marijuana Establishments licensed in the Massachusetts.

## **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.



## TYCA GREEN, INC.

MCN281844

MPN281555

MRN282035

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

TYCA Green, Inc.  
470 Main Street, Clinton, MA 01510

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  
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	Clinton

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

Individual	Role
Maryann Castillo	Director
Franklin Hardy	Director
Caroline Pierce	Director
Zachary Harvey	Owner
Joshua Pierce	Close Associate
Zachary Wise	Close Associate
Seth Yaffe	Close Associate
Jeffrey Pierce	Capital Contributor

Provisional License Executive Summary 1



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 July 25, 2018.
8. The applicant conducted a community outreach meeting on October 17, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on November 27, 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	Implement a cannabis industry training curriculum in partnership with the Workforce Development Center at Springfield Technical Community College, where 40% of the students enrolled in the training curriculum will be from Commission-identified census tracts in Worcester and Springfield.
2	Funding two (2) positive impact scholarships for the cannabis industry training curriculum.
3	Host a minimum of two (2) career fairs per year in Worcester and Springfield.

### **SUITABILITY REVIEW**

11. There were disclosures of 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 licenses.
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	Hire minimum of 20% of employees are from diverse populations.

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	Oils
7	Waxes
8	Shatters
9	Budders
10	Saps
11	Crumbles
12	Creams
13	Salves
14	Lotions
15	Body Butters
16	Topicals
17	Dermal Patches
18	Capsules
19	Cooking Oils
20	Chocolates
21	Fruit Flavored Candies which may include Blueberry, Strawberry, Mango and Watermelon
22	Gums
23	Mints



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

TYCA Green intends to obtain the majority of the marijuana to be sold at its retail locations from its affiliated licenses. In the event that it is unable to do so, TYCA Green may contract with other licensees to purchase marijuana for the purposes of manufacturing marijuana products for wholesale and retail sale.

**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.





**WEST COUNTY COLLECTIVE LLC**  
MCN281512

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

West County Collective LLC  
270 Cloverdale Street, Pittsfield, MA 01201

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

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

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
Jeremy McCann	Executive/Officer/Capital Contributor
Paul Collins	Executive/Officer/Capital Contributor

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

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

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on August 17, 2018.

Provisional License Executive Summary 1



8. The applicant conducted a community outreach meeting on August 1, 2018 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on November 8, 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	Employees will contribute 120 hours of community service, within the first two years, 360 within the first five years by volunteering twice monthly in its own bimonthly community clean-up project in Pittsfield.

### **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.
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	Have 20% of staff and/or contractors be from Commission-approved areas of diversity.

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.



## WISEACRE FARM INC

MCN281406

### **BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Wiseacre Farm Inc.

276 Great Barrington Road, West Stockbridge, MA 01266

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

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

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
Jon Piasecki	Executive

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

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

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on March 13, 2019.

Provisional License Executive Summary 1



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 November 6, 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	Donate time and money to Central Berkshire Habitat for Humanity.

### **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 two (2) months of receiving the provisional license.
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	15% of service providers will be from the following demographics: minorities; women, veterans, people with disabilities, and LBTGQ or identify as non-normative sexual identity.
2	20% of wholesale partners will be from the following demographics: minorities; women, veterans, people with disabilities, and LBTGQ or identify as non-normative sexual identity.

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.

