

NS AJO HOLDINGS, INC.
RMD1425

ESTABLISHMENT OVERVIEW

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

NS AJO Holdings, Inc.

Cultivation: 20 Authority Drive, Fitchburg, MA 01420*

Product Manufacturing: 20 Authority Drive, Fitchburg, MA 01420*

Dispensary: 23 Elm Street, Watertown, MA 02472

*The licensee’s cultivation/product manufacturing location has not completed all required inspections as of the date of this recommendation. A condition of final licensure has been recommended to address the completion of all required inspections related to the cultivation/product manufacturing location.

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

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

LICENSING OVERVIEW

3. The licensee was approved for provisional licensure on July 21, 2017.
4. The licensee has paid all applicable license fees.



5. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license.
6. No new information has been discovered by Commission staff regarding the suitability of the licensee(s) previously disclosed since the issuance of the provisional license.

INSPECTION OVERVIEW

7. Commission staff inspected the licensee's Medical Marijuana Treatment Center on the following date(s): November 26, 2019.
8. The licensee's Medical Marijuana Treatment Center was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 501.000, as applicable.
9. No evidence was discovered during the inspection(s) that indicated the Medical Marijuana Treatment Center was not in compliance with all applicable state and local bylaws or ordinances.
10. Specific information from Commission staff's inspection is highlighted below:

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation



Enforcement staff has not inspected the MTC's cultivation/product manufacturing facility. Enforcement staff recommends a license condition requiring completion of all inspections of the cultivation/product manufacturing facility no later than 120 days after issuance of this final license.

d. Product Manufacturing Operation

Enforcement staff has not inspected the MTC's cultivation/product manufacturing facility. Enforcement staff recommends a license condition requiring completion of all inspections of the cultivation/product manufacturing facility no later than 120 days after issuance of this final license.

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 possess and otherwise acquire marijuana, but shall not cultivate, harvest, prepare, produce, dispense, sell, or otherwise transport marijuana to other Medical Marijuana Treatment Centers, or to patients, until upon inspection, receiving permission from the Commission to commence full operations;
2. The licensee is subject to inspection to ascertain compliance with Commission regulations;
3. The licensee remains suitable for licensure;
4. The licensee shall cooperate with and provide information to Commission staff;
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 501.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business;



6. Prior to commencing operations, the licensee shall submit to Commission staff, upon inspection, an updated timeline for its MTC license with a dispensary location in Fitchburg to become operational;
7. The licensee shall have completed all construction and buildout of its cultivation/product manufacturing facility, obtain a certificate of occupancy for the cultivation/product manufacturing facility, and completed all required inspections of the cultivation/product manufacturing facility within 120 days of the issuance of this final license; and
8. If the licensee fails to achieve operation of its cultivation/product manufacturing facilities on or before the date specified in condition #7, the licensee shall be deemed to have ceased to operate and its license shall be deemed void in accordance with 935 CMR 501.415.

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.

