



# April Monthly Public Meeting

Remote Via Teams



## Meeting Book - April Monthly Public Meeting - Copy

### Table of Contents

#### Call to Order & Chair's Comments/Updates

Chair Hoffman

20210317\_MEETING AGENDA 04.16.21.docx

#### Minutes

20201113\_mins\_Public Hearing\_For Commission Consideration.docx

20201119\_Mins\_Public Meeting\_For Commission Consideration.docx

#### Executive Director's Report

Shawn Collins

20210412\_ED Information Memo for Cs\_vCLEANfinal.docx

#### Staff Recommendations on Changes of Ownership

COO-XS-BEACON COMPASSION, INC.-v2.docx

COO-XS-COMMONWEALTH ALTERNATIVE CARE, INC.-v2.docx

COO-XS-COMMONWEALTH CULTIVATION, INC.-v2.docx

COO-XS-DEBILITATING MEDICAL CONDITIONS TREATMENT  
CENTER, INC.-v2.docx

COO-XS-HEAL, INC.-v2.docx

COO-XS-LIBERTY COMPASSION, INC.-v2.docx

COO-XS-NEW ENGLAND TREATMENT ACCESS, LLC-v2.docx

#### Staff Recommendations on Renewals

ME RENEWAL XS-APRIL-v.2.docx

MTC RENEWAL XS-APRIL-v.2.docx

#### Staff Recommendations on Final Licenses

FL XS-BUD'S GOODS & PROVISIONS-MR282410-v.2.docx

FL XS-CANNATECH MEDICINALS-MC282690-v.2.docx

FL XS-CAREGIVER-PATIENT CONNECTION-MC282206-v.2.docx

FL XS-COASTAL CULTIVARS-MC282052-v.2.docx

FL XS-GREEN MEADOWS FARM-MC282409-MP281763-v.2.docx

FL XS-GREEN STRATUS CORP.-MR282256-v.2.docx

FL XS-GREEN WORLD-MR281939-v.2.docx

FL XS-HARMONY OF MA-MR282668-v.2.docx

FL XS-HEAL STRUBRIDGE, INC-MR283323-v.2.docx

FL XS-LIBERTY MARKET-MR281804-v.2.docx

FL XS-MMM TRANSPORT-MT281556-v.2.docx

FL XS-THE HEADYCO-MCN281292-v.2.docx

FL XS-THE HEALING CENTER-MR283193-v.1.docx

FL XS-THE OLD BANK-MR282467-v.2.docx

FL XS-VOLCANN-MR282925-v.2.docx

MFL XS-GREEN MEADOW-MTC1626-v.2.docx

#### Staff Recommendation on Provisional Licenses

PL XS-BOATHOUSE STORE, LLC-MRN283919-v.2.docx

PL XS-C3 BERLIN, LLC-MRN283625-v.2.docx

PL XS-COASTAL CULTIVARS, LLC-MRN282884-v.2.docx

PL XS-DEBILITATING MED. CONDITION TREATMENT CENTERS-  
MCN283056-v.2.docx

PL XS-DISCERN'D CANNABIS PURVEYORS, INC.-MRN283997-  
v.2.docx

PL XS-EAST BOSTON BLOOM, LLC-MRN283011-v.2.docx

PL XS-FCC HOLDINGS, LLC-MBN282029-v.2.docx

PL XS-FLOWER POWER GROWERS, INC.-MCN283122-MPN281983-  
v.2.docx

PL XS-HOME GROWN 617, LLC-MRN281626-v.2.docx

PL XS-IDEAL CRAFT CANNABIS-MCN283286-MPN282007-v.2.docx

PL XS-LC SQUARE, LLC-MPN282013-v.2.docx

PL XS-LEAF RELIEF, INC.-MRN283784-v.2.docx

PL XS-MORNING DEW, LLC-MBN282152-v.2.docx

PL XS-NUUESTRA, LLC-MRN283974-v.2.docx

PL XS-R AND R VENTURES-MBN281504-v.2.docx

PL XS-RC RETAIL PRINCETON, LLC-MRN283815-v.2.docx

PL XS-TEMPEST, INC-MRN282429-v.2.docx

#### Commission Discussion & Votes

Copy of 2021 Delegation - Master.xlsx

Tab A - RFR SEP draft.docx

#### Next Meeting Date & Adjournment

20210406\_PPT\_Public Meeting v1.pptx

April 14, 2021

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

CANNABIS CONTROL COMMISSION

**April 16, 2021  
10:00AM**

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

PUBLIC MEETING AGENDA

- 1) Call to Order
- 2) Chairman's Comments and Updates
- 3) Minutes for Approval
- 4) Executive Director's Report
  - a. Social Equity Program Update
  - b. Update on Hemp Products
  - c. Disproportionate Impact Study: Update
- 5) Staff Recommendations on Changes of Ownership
  - a. Beacon Compassion, Inc.
  - b. Commonwealth Alternative Care, Inc.
  - c. Commonwealth Cultivation, Inc.
  - d. Debilitating Medical Condition Treatment Centers, Inc.
  - e. Heal, Inc.
  - f. Liberty Compassion, Inc.
  - g. New England Treatment Access, LLC
- 6) Staff Recommendations on Renewals
  - a. ARL Healthcare, Inc. (#MCR139983)
  - b. ARL Healthcare, Inc. (#MPR243597)
  - c. ARL Healthcare, Inc. (#MRR205712)
  - d. Beacon Compassion, Inc. (#MCR139982)





- e. Beacon Compassion, Inc. (#MPR243596)
- f. Buds Goods & Provisions Corp. (#MRR205736)
- g. Buds Goods & Provisions Corp. (#MRR205723)
- h. Canna 11 Holyoke, LLC (#MCR139965)
- i. Cape Cod Grow Labs, LLC (#MCR139965)
- j. Cape Cod Grow Labs, LLC (#MPR243584)
- k. CTDW LLC (#MRR205713)
- l. Cultivate Leicester, Inc (#MRR205717)
- m. Eagle Eyes Transport, Inc (#MTR263099)
- n. EOS-Bittersweet LLC (#MCR139987)
- o. Fernway LLC (#MPR243600)
- p. Gaul Greenery LLC (#MRR205699)
- q. Ganesh Wellness Inc. (#MPR243592)
- r. Ganesh Wellness Inc. (#MRR205710)
- s. Garden Wonders, Inc (#MRR205707)
- t. Green Meadows Farm, LLC (#MRR205725)
- u. Green Stratus Corp (#MRR205722)
- v. Grow Team Gardens LLC (#MBR169271)
- w. Harvest of Worcester (#MRR205709)
- x. Heal Provincetown, Inc (#MRR205719)
- y. Hennep, Inc. (#MRR205730)
- z. High Hawk Farm LLC (#MCR139975)
- aa. Highminded LLC (#MPR243587)
- bb. Highminded LLC (#MRR205703)
- cc. Hudson Botanical Processing, LLC (#MPR243588)
- dd. Humboldt LLC (#MCR139977)
- ee. In Good Health Inc. (#MRR205711)
- ff. Mantis Management Group (#MPR243593)
- gg. Munro Associates LLC (#MRR205732)
- hh. Munro Associates LLC (#MRR205733)
- ii. Munro Associates LLC (#MRR205734)
- jj. Native Sun MFG LLC (#MPR243595)
- kk. Native Sun Wellness Inc (#MRR205706)
- ll. Nature's Remedy of Massachusetts, Inc. (#MRR205718)
- mm. Northampton Enterprises, Inc. (#MRR205702)
- nn. NS AJO Holdings Inc. (#MCR139986)



oo. NS AJO Holdings Inc. (#MPR243599)  
pp. NS AJO Holdings Inc. (#MRR205708)  
qq. Ocean Breeze Cultivators LLC (#MCR139984)  
rr. Ocean Breeze Cultivators LLC (#MPR243598)  
ss. Silver Therapeutics, Inc. (#MRR205705)  
tt. Suns Mass, Inc. (#MCR139985)  
uu. The Old Bank, LLC (#MRR205715)  
vv. Alternative Compassion Services (#RMD585)  
ww. Atlantic Medicinal Partners, Inc. (#RMD1506)  
xx. Beacon Compassion Center, Inc. Medical Marijuana Treatment Center  
yy. Briarleaf, LLC, Medical Marijuana Treatment Center  
zz. Green Gold Group, Inc. (#RMD786)  
aaa. Holistic Industries (#RMD1526)  
bbb. Mass Alternative Care, Inc. (#RMD726)  
ccc. Phytotherapy, Inc., Medical Marijuana Treatment Center  
ddd. Pleasantrees, Inc., Medical Marijuana Treatment Center  
eee. Theory Wellness Inc. (#RMD305)

7) Staff Recommendations on Final Licenses

a. Bud's Goods & Provisions Corp. (#MR282410), Retail  
b. Cannatech Medicinals, Inc. (#MC282690), Cultivation, Tier 2 / Indoor  
c. Caregiver-Patient Connection, LLC (#MC282206), Cultivation, Tier 3 / Indoor  
d. Coastal Cultivars, LLC (#MC282052), Cultivation, Tier 11 / Outdoor  
e. Green Meadows Farm, LLC (#MC282409), Cultivation, Tier 3 / Indoor  
f. Green Meadows Farm, LLC (#MP281763), Product Manufacturer  
g. Green Stratus Corp. (#MR282256), Retail  
h. Green World, LLC (#MR281939), Retail  
i. Harmony of MA, Inc. (#MR282668), Retail  
j. Heal Sturbridge, Inc. (#MR283323), Retail  
k. Liberty Market, LLC (#MR281804), Retail  
l. MMM Transport, Inc. (#MT281556), Third-Party Transporter  
m. The Headyco, LLC (#MC281292), Cultivation, Tier 2 / Indoor  
n. The Healing Center, LLC (#MR283193), Retail  
o. The Old Bank, LLC (#MR282467), Retail  
p. Volcann, LLC (#MR282925), Retail  
q. Green Meadow Farm, LLC (#MTC1626), Medical Marijuana Treatment Center

8) Staff Recommendations on Provisional Licenses



- a. Boathouse Store, LLC (#MRN283919), Retail
  - b. C3 Berlin, LLC (#MRN283625), Retail
  - c. Coastal Cultivars, LLC (#MRN282884), Retail
  - d. Debilitating Medical Condition Treatment Centers (#MCN283056), Cultivation, Tier 10 / Outdoor
  - e. Discern'd Cannabis Purveyors, Inc. (#MRN283997), Retail
  - f. East Boston Bloom, LLC (#MRN283011), Retail
  - g. FCC Holdings, LLC (#MBN282029), Microbusiness
  - h. Flower Power Growers, Inc. (#MCN283122), Cultivation, Tier 3 / Indoor
  - i. Flower Power Growers, Inc. (#MPN281983), Product Manufacturer
  - j. Home Grown 617, LLC (#MRN281626), Retail
  - k. Ideal Craft Cannabis, Inc. (#MCN283286), Cultivation, Tier 1 / Indoor
  - l. Ideal Craft Cannabis, Inc. (#MPN282007), Product Manufacturer
  - m. LC Square, LLC (#MPN282013), Product Manufacturer
  - n. Leaf Relief, Inc. (#MRN283784), Retail
  - o. Morning Dew, LLC (#MBN282152), Microbusiness
  - p. Nuestra, LLC (#MRN283974), Retail
  - q. R and R Ventures, LLC (#MBN281504), Microbusiness
  - r. RC Retail Princeton, LLC (#MRN283815), Retail
  - s. Tempest, Inc. (#MRN282429), Retail
- 9) Commission Discussion and Votes
- a. Commission Delegation of Limited Authority to the Executive Director
  - b. Authorization to Issue Request for Responses: Social Equity Program Vendors
- 10) New Business the Chair Did Not Anticipate at the Time of Posting
- 11) Next Meeting Date
- 12) Adjournment

\*Closed captions available

## Notice of Executive Session

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



- 1) Applicants' or licensees' plans or other application information if, in the opinion of the Chair, discussion of such information in an open meeting may pose a risk to the public health, safety, welfare or security.
- 2) Records if in the opinion of the Chair, discussion of such records in an open meeting may disclose confidential information under G. L. c. 94I, §§ 2 (e) and 3 and the regulations, 935 CMR 500.002, 500.820, 501.002 and 501.820.



CANNABIS CONTROL COMMISSION

**November 13, 2020  
10:00AM**

**Remote Participation via [Facebook Live](#)**

PUBLIC HEARING MINUTES

1) Call to Order

- The Chairman recognized a quorum and called the meeting to Order.
- The Chairman gave notice that the meeting is being recorded.
- The Chairman gave an overview of the regulatory process and the purpose of the hearing, its role in soliciting public input above and beyond the legal requirements under the Administrative Procedure Act, and its intent to supplement the written comment solicited, which has also above and beyond the legal requirements, in order to ensure that all public input was heard.
- The Chairman gave an overview for the process and procedure for the hearing.

2) Public Testimony on Delivery Regulations

- Grant Ellis
  - Supports the changes to regulations proposed, including the establishment of the Delivery Operator license and Marijuana Courier license, as well as the three-year exclusivity period.
  - Believes it demonstrates a commitment to equity.
  - Expressed concerns about the arguments being used against the new delivery regs.
- Morriss Partee
  - Supported the Delivery Operator licenses changes proposed and characterized them as thoughtful.
  - Expressed that the new delivery model will benefit consumers to purchase at the retail rates, not an inflated rate.
  - Also stated belief that the new model will strengthen the cannabis industry as a whole and allow for more “mom and pop” market entrants.
- Averyl Andrade
  - Identified themselves as an Economic Empowerment applicant.
  - Expressed strong support for the exclusivity period to begin tolling only when the first Delivery Operator licensee is given authority commence operations.



- Characterized critiques of the approach as profit protection by larger corporations.
- Supports delivery regulations as considered by the Commission on October 20, 2020.
- Devin Alexander
  - Identified themselves as a graduate of the first cohort of the Social Equity Program.
  - Expressed frustration with the continuing delays to passing final regs.
  - Characterized challenges to the Delivery Operator license as protecting corporate profits.
  - Expressed support for equity measures.
- Alisa Brewer
  - Represented that their comments were their own and not that of any affiliation they hold.
  - Supports steps being taken to support Economic Empowerment Applicants and Social Equity Program participants, especially given the harms of the “War on Drugs”.
  - Expressed concern about the 3% local tax option not making it into municipal communities, especially in the face of budget shortfalls.
  - Expressed general support for the Delivery Operator license, but notes that it creates new considerations for municipalities, in particular that delivery, as initially contemplated, would ensure that sales were through a Marijuana Retailer, ensuring that municipalities were getting that 3% tax, but with the Delivery Operator license, that may result in other municipalities getting that benefit.
    - Requested working with the DOR to develop a “win/win” situation for municipalities and equity operators.
- David Rabinovitz
  - Asked for a sunset provision with respect to requiring a second agent for delivery with a body camera.
    - Believes that these requirements are appropriate for a federally controlled substance, but once federally decriminalized, the requirement should no longer be necessary, and therefore should phase out.
  - Does not support the two license cap for delivery, noting it is the only license type with such a cap.
    - Recognizing the anti-market-dominating motivation, suggests that after 10 licensees have been operational for 12 months, lifting the cap to the standard 3 license cap.
    - Suggests that this would allow operators to get established but does not limit upside benefits for successful operators.
  - Supports provisions that prohibit third-party technology platforms from holding any interest in Delivery Licensees.
  - Expressed preference that there be no caps on the number of vehicles that can be used by a Delivery Licensee.



- Alternatively, if there are caps put on the number of vehicles, that a commensurate limit be put on Marijuana Retailers with respect to the number of bud tenders or check out stations available.
    - Similarly, indicated that limits on hours of operation should be the same for Marijuana Retailers and Delivery Licensees.
  - Urged Commission to keep delivery operator regulations as proposed.
- Jennifer Dudley
  - Supports the establishment of both Delivery Operator and Marijuana Courier licenses.
    - Noting that a courier only model would ensure that all profits flowed to the Marijuana Retailer.
    - Cited delivery agreements that required a Delivery Courier to cede 9.9% of its equity to the Marijuana Retailer.
    - Believes that the establishing both delivery license types are the only way to create an equitable market.
  - Characterized opposition to the structure as corporate profit protection.
  - Supports a minimum 3-year exclusivity period for delivery.
- Blake Mensing
  - Supports the Delivery Operator and Marijuana Courier regulations.
  - Criticized those opposed to the regulatory scheme for delivery.
  - Does not believe that there is a real risk of municipalities losing tax revenue, suggests municipalities can execute HCAs with Delivery Operator licensees.
  - Gave a statement on the importance of equity to counter the harms caused by cannabis prohibition.
- Edward “Big Ed” DeSousa
  - Expressed frustration in the delay of approving the regulations.
  - Supports delivery regulations as proposed.
  - Suggested changes to quality control samples.
- Chandra Batra
  - Supports the delivery regulations as proposed.
  - Characterized opposition to the structure as corporate profit protection.
  - Suggest increasing cap on delivery licenses to 3 and allowing repackaging.
  - Suggests allowing craft marijuana cooperatives to participate in delivery.
  - Suggested developing additional license type for delivery to create even greater flexibility.
  - Encourages strong enforcement of the exclusivity period.
- Kate Phillips Averick



- Supports the delivery regulations as proposed and the central focus on social equity in developing them.
- Suggests that the 51% ownership requirement makes it harder to obtain capital without predatory terms.
- Noted that market prices are artificially high and do not reflect consistency or quality of product but allowing for warehousing and purchasing at wholesale by Delivery Operators, equity licensees will have a chance to directly reach consumers without a further inflated price.
- Supports three year exclusivity period and encourages additional innovation o support equity licensees in the delivery space, including:
  - A one-person courier model.
  - Allowing repackaging.
- Jessica Angeline
  - Commends the Commission for keeping equity central in developing the delivery regulations.
  - Supports the three-year equity exclusivity period.
  - Characterized criticism of these regulations as corporate profit protection and contradicted statements made with respect to municipal control.
- Arthur Gulumian
  - Supports the delivery operator license type.
  - Suggest increasing the cap for delivery operator to 3 total and disassociating the license type with the retail license type.
    - Raised concern that the license cap would limit ability to expand.
- Goldie Piff
  - Noted that the cannabis industry in Massachusetts had reached \$1,000,000,000, but that little of it made it to equity applicants.
  - Expressed support for the delivery operator license to help establish equity in the market.
  - Supported the three-year exclusivity period as a minimum.
  - Characterized criticism of these regulations as anti-equity and profit hoarding.
  - Believes the delivery regulations as currently written are crucial to equity.
- Mike Crawford
  - Offered apology to Commissioner McBride and other Commissioners for past harsh criticisms, commending recent work with respect to the delivery regulations.
  - Supports the three year exclusivity period and delivery operator license.
  - Expressed criticism of medical dispensaries who got a head start through priority and those who oppose the delivery regulations as drafted.





- Speaker Stanley Horton withdrew.
- Veronica Santarelli
  - Expressed frustration on the delay of delivery regulations,
    - Cited the disproportionate distribution of profits from the industry.
    - Noted how delivery could be helpful in stemming the spread of COVID-19.
    - Suggested that the delay allowed for continuation of certain aspects of the illicit market.
  - Supports the delivery regulations as drafted.
- Kathryn Rifkin
  - Expressed the crucial aspect of equity programing in reversing the disparate impact of the war on drugs.
  - Supports the establishment of both Delivery Operator and Marijuana Courier license types as a way to ensure that there is profitability for equity licensees without being reliant on other entities, in particular larger operators.
  - Supports the 3 year exclusivity period.
- Ericca Kennedy
  - Identified themselves as a social equity program participant.
  - Supports the draft delivery regulations as most recently approved.
    - Cited ability to warehouse and white label as key mechanisms to equity and the development of profit/wealth that only begins to repair the damage done by the war on drugs.
  - Encourages the Commission to not allow any more delays.
  - Criticized objections to the regulations as oppression disguised as opposition.
- Brian Whalen
  - Supports the draft regulations.
  - Expressed the tax consequences of various aspects of delivery operation.
    - Noted that due to federal prohibition and the impact on tax exemptions, a second driver, for example, cannot include this expenditure in the Cost of Goods Sold, and therefore creates “phantom profit” that will result in a much higher tax margin than retailers who do not have the obligation to have a second human resource devoted to a transaction. This can only be addressed through economy of scale and higher profit margins.
- Nicholas Gomes
  - Believes there should not be as many restrictions or caps on delivery licensees.
    - Believes caps on the number of licenses, vehicles, and warehouses reduce the earning potential and create a secondary class of licenses.



- Suggests creating a single license type that allows the functionality of both the Delivery Operator and Marijuana Courier.
- Expressed that requiring a second agent in the vehicle creates waste given other security requirements in the regulations.
- Increase retail value of product in the vehicle from \$10,000 to \$30,000.
- Suggests that the exclusivity period to not begin tolling until after 5-10 licensees gain authorization to commence operations to ensure a stronger foothold for equity licensees.
- Ominique Garner
  - Supported the development of both the Delivery Operator and Marijuana Courier license types.
  - Suggested increasing or time-limiting the license cap on delivery licenses.
  - Criticized those opposing the delivery regulations.
  - Suggested eliminating the cap on the number of delivery vehicles.
  - Expressed overall disappointment in the equitable distribution of wealth generated by the industry.
    - Suggested appointing a liaison to the equity community to ensure accountability in achieving the Commission's equity mandate.
- Lucas Thayer
  - Supports the establishment of the Delivery Operator Licensee.
    - Believes that delivery is important, especially considering the impacts of COVID-19.
    - Believes delivery is crucial for social equity and supports the three year exclusivity period.
  - Believes that regulations should be drafted to allow people to transition from the illicit markets.
    - Believes the key to this is ensuring delivery licensees can offer competitive pricing compared to the illicit market, and which requires lowering the barriers of entry.
      - Cited security requirements and adjusting them to the minimum to protect product and driver and not have any requirements in excess.
- Justin Kennedy
  - Identified themselves as an Economic Empowerment Priority Applicant.
  - Supports the draft delivery regulations, including the ability for Delivery Operators to warehouse and white label products.
    - Encourages the Commission to prevent further delay in approving the regulations.
  - Countered the argument that the delivery operators would hurt brick and mortar stores.
  - Expressed the importance of delivery regulations in achieving full participation in the industry.



- Tito Jackson
  - Commended the Commission for listening to those who expressed concern with respect to the economic viability of the Marijuana Courier model.
    - Expressed the importance of delivery in the time of COVID.
    - Believes that the Delivery Operator license type is also beneficial to consumers.
  - Recommended the Commission increase the cap on delivery licenses to three in order to ensure that equity applicants in the delivery space get the same treatment as other license types.
  - Addressed concerns raised by municipalities, suggesting that illicit delivery is already happening in these places, but regulated delivery, conversely, could prove to be a positive revenue generator for municipalities.
  - Supports three year exclusivity period.
  - Indicated that the key to success of delivery is access to product, which has been an issue facing the industry across the board.
- Sieh Samura
  - Expressed support for previously made comments.
  - Supports the three year exclusivity and flexibility of the two delivery license types.
  - Commented on the slow progress of equity, citing first that the Department of Public Health did not have an equity mandate, which gave medical operators influence in setting up an adult-use market at the Commission.
  - Emphasized the importance of equity.
    - Expressed that exclusivity for delivery and social consumption are not a handout, but compensation for a debt owed resulting from the disproportionate impact of cannabis prohibition.
- Dawn Duncan
  - Identified themselves as indigenous and stressed the need of equity to help indigenous folks.
  - Shared perspective that equity mission has not been fulfilled.
  - Supports delivery regulations as a step in the right direction.
- Aaron Goines
  - Expressed frustration with the delay in regulations.
  - Criticized those opposing the regulations as hurting social equity and economic empowerment applicants.
  - Likened the delivery into towns to UPS, FedEx, Amazon, and pizza delivery, so the lack of tax revenue to municipalities should not only be a problem for cannabis delivery.

The Commission took a ten minute recess, returning at 1:44:11



- Christopher Fevry
  - Identified themselves as a delivery applicant, president of MCAD and a Social Equity Program participant.
  - Expressed general support for the delivery regulations, noting that if left with only the courier model, following exclusivity, retailers would likely crowd them out of the space by obtaining delivery endorsements.
  - Opposed caps on the number of vehicles a Delivery Licensee, noting that medical delivery is not limited in the number of vehicles.
  - Criticized opposition to the delivery regulations as unreasonable and encouraged the Commission to approve regulations as proposed.
- Daniel Berger
  - Identified themselves as a Social Equity Program participant and delivery applicant.
  - Addressed concerns of municipalities with respect to tax collection.
    - The Delivery Operator license will require an HCA, so municipalities can get tax revenue by allowing delivery operators to set up in their borders.
  - Suggests removing the 2-license cap on delivery licenses, comparing it to the three licenses allowed for Marijuana Retailers.
  - Noted that for Social Equity Program participants, access to capital is already an issue, and further delays make capitalizing a business even harder.
  - Asks the commission to continue acting as a national model for equity.
- David Garipey
  - Identified themselves as a third party platform developer.
  - Supports the draft delivery regulations.
  - Believes that technology can help leveraging the needs of delivery licensees, including security requirements.
  - Believes that the delivery regulations will go a long way in establishing equity and inclusion in the cannabis industry.
    - Talked about a recent study out of Harvard Business School, that shows that more diverse workplaces result in better business outcomes and diversity and inclusion initiatives have the most long-term success when otherwise marginalized people are in positions of power.
- Steve Bowman
  - Expressed overall support of the draft delivery regulations.
  - Suggested that there may be more flexibility that may be had through the Marijuana Courier license.
  - Noted that there are a lot of local, small Marijuana Retailers who are excited to work with Marijuana Couriers to deliver product to their Consumers.
  - Expressed frustration with the delays in the promulgating of the regulations.



- Mike Brais
  - Believes that the draft regulations will bring more Consumers into the regulated market from illicit transactions.
  - Does not believe delivery licenses will cut into profits of brick and mortar stores.
  - Expressed support for the equity mission and how the delivery licenses support that mission.
- Ruben Seyde
  - Generally, supports the draft delivery regulations and the positive impact on equity they are expected to have.
  - Suggests removing the 2 license cap for delivery licenses.
  - Opposed caps on the number of vehicles a licensee can have, especially when there is no cap on the number of bud tenders or customers served in a given day for Marijuana Retailers.
  - Opposed the inability of Delivery Operators to Repackage, when Marijuana Retailers can, noting that white labeling adds an additional cost for Delivery Operators.
  - Criticized arguments that the Commission did not provide sufficient time for municipalities to consider the delivery regulations, noting how long delivery has been a subject of deliberation among the Commission.
- Sherri Tutkus
  - Supports the delivery licenses and the exclusivity period.
  - Criticized those opposing the delivery licenses as protecting corporate profits.
  - Expressed concerns about predatory behavior under the Marijuana Courier license, and the Delivery Operator license type is key to mitigating the risk of that.
  - Encouraged the Commission to vote on final regulations as scheduled and not allow further delay.
- Payton Shubrick
  - Supports the new delivery license.
  - Opposed a cap on the number of vehicles delivery licensees may have.
  - Suggests that tolling of the exclusivity period should not start until 5 delivery licensees have commenced operations.
  - Expressed the importance of delivery license types to equity and inclusion in the marijuana industry.
  - Encouraged the Commission to vote on final regulations without additional delay.
- Andrew Mutty
  - Expressed general support for the draft delivery regulations.



- Opposed a cap on the number of vehicles delivery licensees may have, noting that there is not cap on the number of bud tenders in Marijuana Retailers and therefore would result in missed sales opportunities.
- Believes the exclusivity period should be extended to five years.
- Opposes the requirement for second agents in delivery vehicles, indicating that it is a cost without commensurate added safety.
- Chirag Patel
  - Expressed concerns about what happens to the Delivery Operator licensees after the exclusivity period ends and larger operators can crowd them out given they have sufficient capital to undercut prices and drive smaller operators out.
    - Believes courier model does not have the same risk, provided that the fees are sufficient.
    - Believes sharing profits between retail and delivery couriers should make the courier model viable.
    - Believes this will result in overall higher revenue for everyone and references companies like Drizly that deliver for liquor stores.
- Lorna McCafferty
  - Commends the Commissions attempts to be intentional about equity in developing delivery regulations.
  - Characterized opposition to delivery regulations as corporate profit protection.
    - Says that this avoids artificial middleman status for Marijuana Retailers that put them in a position to be predatory toward Social Equity and Economic Empowerment businesses.
  - In strong support of both delivery license types and believes it will go a long way in supporting the equity mission of the Commission.
  - Encouraged the Commission to approve the regulations with no further delay.
- Alethea Amponsah
  - Identified herself as a member of the first Social Equity Program class.
  - Supports the Commissions commitment to equity.
  - Supports the draft delivery regulations as proposed.
    - Supports the three year exclusivity period.
    - Recommends lifting the 9pm cutoff time for delivery.
  - Shared experience as a woman of color trying to enter the cannabis market, despite having an ivy league background.
  - Talked about the ease with which multi-state operators enter markets.
- Sean Sheridan
  - Identified themselves as a member of the Social Equity Program.



- Recommends untying delivery licenses from the retail license cap.
- Believes the cap on the number of licenses should be increased to three.
- Encourages the Commission to not allow any further delay in the regulations.
- Cynthia Mompont
  - Expressed frustration with delays in effectiveness of the delivery regulations.
  - Generally, supports the draft delivery regulations.
  - Recommended building regulatory provisions to ensure that equity initiatives are not thwarted by industry leaders and local control does not create additional barriers to entry.
  - Suggest extending the exclusivity period indefinitely, to be reexamined in 5 years.
    - Believes this will help overcome certain hurdles of entry to the market.
  - Criticized those who oppose the delivery regulations as funded.
- Nathan Pierre
  - Opposed caps on vehicles.
  - Requested that the cap on the number of delivery licenses be raised to three, to be in line with the limits on other license types.
  - Addressed the criticism of the new Delivery Operator license type, noting that the same large multi-state operators opposing the establishment of the Delivery Operator have the most to gain from it by being the primary source of wholesale purchases by Delivery Operator licensees.
    - Characterized their opposition as greed, with these businesses wanting to keep all the retail profit for themselves in addition to the wholesale revenue.
- Scott Brodksy
  - Expressed disappointment in the lack of equitable access to the industry.
  - Encourages reducing barriers to entry for delivery licensees by limiting the requirements designed to create safety.
    - Cites these safety regulations as additional costs of business that have largely contributed to the lack of diversity and equity in the established industry to date.
  - Generally, supports the Delivery Operator license type, but suggests there are ways to ensure easier entry to the market.
    - Opposes caps on the number of vehicles.
    - Suggests eliminating the requirement for a second agent in the vehicle.
    - Suggests eliminating restrictions on hours of operations.
    - Recommends extending the exclusivity period to five years.
- Darius Monteiro
  - Identified themselves as a social equity program participant and delivery license applicant.
  - Does not understand the strong opposition to these regulations.
  - Generally, supports the draft delivery regulations.



- Believes issues of barriers to entry with respect to Delivery Operator license should be up to the applicant to resolve, and it is patronizing to suggest the license type should not exist because some applicants would not be able to overcome those barriers.
- Maurice Stringer
  - Yielded some time to Cynthia Mompont.
    - Asked for demographic information for the second cohort of the Social Equity Program.
  - Believes barriers to entry are not being addressed through the delivery license types.
- Jensen Mejia
  - Expressed concerns around the misunderstanding municipalities seem to have, since no matter what the Commission does, the municipalities have control to stop equity.
  - Believes the draft delivery regulations are on the right track.
- Jason Cragholm
  - Believes there is substantial opportunity to establish equity through the draft delivery regulations.
  - This can only be the beginning and it will take a long time and constant commitment to achieve equity.
  - Suggests, whatever the commission decides, double it.
- Stephen Mandile
  - Supports the draft delivery regulations.
  - Supports at least a 3 year exclusivity.
  - Encourages the Commission to prevent any further delays.
  - Encourages businesses and municipalities to join the fight for social equity.
- Brandon Pollock
  - Supports the Delivery Operator license type as a way to support equity.
  - Supports limits to the size of the businesses.
    - Concerned without limits on the size of businesses creates opportunity for large players to take over the delivery market and predatory lending.
    - Supports a modest fleet size restriction.
- David Torrisi
  - Disappointed in the commission and does not believe the process was transparent or inclusive.
  - Believes that the delivery licensees would be retailers and therefore hurts existing licensees.





- Believes that municipalities will lose tax revenue as a result of the Wholesale Delivery license.

The Commission took a 30 minute recess, returning at 3:28:53.

- Jonathan Batres
  - Generally, supports the draft regulations.
  - Characterized opposition of the regulations as whining and noted that the purpose of social equity is to make it easier.
  - Suggested that lowering barriers to entry and making the legal market attractive to enter is the only way to address the illicit market.
  - Encourages the Commission to prevent any further delay.
- [Speaker called upon that did not respond.]
- Statement on behalf of Mayor Daniel Rivera
  - Stated concern that delivery will reduce safety.
  - Expressed concern that wholesale delivery operators will be able to locate in the City of Lawrence despite the city's vote not to allow cannabis operations.
  - Expressed that the months of discussion and multiple comment periods and hearings were not sufficient for stakeholders to be informed.
  - Emphasized the importance of local control in the licensing process.
- Daniel Napolitano
  - Expressed concerns about how the Commission's regulations do not include municipal zoning decisions.
  - Expressed concern that cities and towns have not been involved enough in the multiple public comment periods and hearing.
- Jordan Clark
  - Identified themselves as a Social Equity license holder.
  - Expressed concern about the utility of Delivery for those subject to property/real estate limitations on marijuana use, in particular medical-use patients, recognizing that changing the law to effect this change is not within the Commission's jurisdiction.
    - Encouraged the Commission to address this in whatever way it can.
- Philip Smith
  - Identified as a participant in the first cohort of the Social Equity Program.
  - Thanked the Commission for the thoughtful approach to the delivery regulations.
  - Generally, supports the delivery regulations.



- Encouraged the Commission to reduce as many restrictions as possible, at least for the duration of the exclusivity period.
    - This would allow equity licensees to make the most of that time in terms of establishing their businesses.
  - Noted that there are municipalities and non-equity businesses that are committed to working with equity licensees.
- Brian Belts
    - Generally, supports delivery regulations, and believes it will advance equity
    - Encourages the Commission to reduce restrictions on licensees including limits on hours of operation, caps on the number of vehicles, and two agents in the delivery vehicle.
    - Questioned the motives of those opposing the delivery regulations.
    - Argued against the idea that a single company could cover the whole state, noting that it would not be cost efficient to drive an hour to deliver a \$40-\$100 order.
  - Michael Hunnewell
    - Does not support Delivery Operator license.
    - Believes the Delivery Operator license will only support MSO control of the market sector once the exclusivity period ends.
      - Cited that large operators could own up to 49% of the equity delivery businesses.
    - Identified lack of competition as a key issue in the industry.
    - Feels that retail stores should be protected.
    - Supports courier model.
  - Jim Smith
    - Does not support the Delivery Operator regulations.
      - Believes it violates the municipal control requirements under the statute.
    - Cited people with access to capital through their family and friends, the sale of personal assets, or their pension funds as being, and therefore feels that the establishing the Delivery Operator license would not be fair to people with those economic privileges.
    - Feels the Delivery Operator license will hurt brick and mortar stores.
    - Believes the multiple comment periods and hearings were not sufficient to give municipalities the ability to comment on the regulations.
    - Expressed concern that at the end of the exclusivity period, due to the ability of a company to own up to 49% of an equity licensee's business, will result in market consolidation.
  - Dr. Karen Munkacy
    - Generally, supports the exclusivity period for delivery.
    - Expressed concern that the Delivery Operator license regulations will open the market to a few large players.
    - Believes there should be limits on the number of vehicles.



- Taylor Schlacter
  - Expressed concern that after the exclusivity period, large operators will take over the delivery sector.
    - Encouraged the Commission to establish safeguards to ensure that gains made during the exclusivity period are not lost once exclusivity has ended.
  - Believes the barriers to entry for the Delivery Operator license should mean that the license type should not be created.
  - Believes the second agent requirement is superfluous and does not provide additional security.
- Chris Mitchem
  - Does not support the Delivery Operator license type.
    - Believes it will impact their business.
  - Believes that the Delivery Operator license type creates risk of predatory contractual agreements.
  - Feels it is unfair to their business to allow social equity applicants to get a Delivery Operator license and compete with retailers.
- Mayor Kim Driscoll
  - Believes the Delivery Operator license will be a major change and hurt municipalities to collect 3% local tax option despite the ability to execute Host Community Agreements with such licensees.
  - Feels that it will hurt brick and mortar stores.
- Jigar Patel
  - Supports Marijuana Courier License but not Delivery Operator license.
  - Believes the Marijuana Courier license will enhance the market, but the delivery operator will “cannibalize” the industry.
  - Supports exclusivity but only if there are restrictions on the business, including that Economic Empowerment and Social Equity licensees are 100% owned by eligible individuals and that there be a limit on the number of vehicles they licensee can have.
- Ian Woods
  - Identified themselves as social equity program participants.
  - Expressed frustration with the contradiction of municipalities complaining about lost tax revenue while choosing not to execute Host Community Agreements with equity applicants or delivery licensees.
  - Supports the Delivery Operator license.
  - Encouraged extending the exclusivity period to five years.



- Commended the Commission on its responsiveness to the public with respect to the limits of the Marijuana Courier business model, and therefore establishing the Delivery Operator license.
- Gabe Salazar
  - Believes the Marijuana Courier license is viable in addition to the Delivery Operator license.
  - There should not be caps on the number of warehouses or number of cars.
  - Encourages the ability use of Third-Party Technology Platforms to reduce barriers to entry for delivery licensees.
- Desmond Hyde
  - Strongly supports the Delivery Operator license type.
    - Emphasized the importance of this license as an opportunity for social equity.
  - Encouraged the Commission not to delay effectiveness of the regulations, especially in the context of a pandemic.
  - Recommended that that delivery licenses have the same 3 license limit as other license types, not be limited in the number of warehouses or vehicles, extend the exclusivity period, and not be required to have a second driver.
- Gabe Singal
  - Expressed the importance of both delivery license types, in particular the Delivery Operator License, as important to achieving social equity in the cannabis industry.
  - Criticized elected officials who are standing in the way of social equity.
  - Opposes any restriction on the number of vehicles.
  - Encourages the Commission to set license caps for delivery in line with other license types.
  - Suggests that the second agent in a delivery vehicle adds added cost without creating the intended additional safety.
  - Supports restrictions on Third-Party Technology Platforms to prevent domination of the market.
- Vernon Jackson
  - Commends the Commission on its responsiveness to public comment with respect to Delivery licenses.
  - Encourages the Commission to approve the regulations without delay.
  - Supports the three year exclusivity period but suggested it should begin tolling after the first Delivery Operator License commences operations, rather than when the first Marijuana Courier license commences operations.
  - Suggests setting license cap for delivery licensees in line with other license types.
  - Opposes the restriction on Repackaging, citing the ability to Repackage as important to branding.



- Noted that municipalities can address their concerns about tax revenue by entering into Host Community Agreements with equity applicants.
- Shanel Lindsay
  - Noted that equity is a statutory mandate for the Commission but has not been achieved in the industry.
  - Supports the exclusivity period.
  - Expressed that the regulations are drafted to prevent market domination, so concerns in that regard are unfounded.
- Edward M. Sousa
  - Expressed support for the equity driven comments made throughout the day.
  - Generally, supports the delivery licenses.
  - Criticized those who oppose the delivery regulations by saying that the pie is big enough for everyone.
- Joel Gonzalez
  - Identified themselves as a member of the Social Equity Program.
  - Stated that the delivery license types will not cut into the business of Marijuana Retailers, but instead will expand the number of people who access it.
  - Generally, supports delivery licensees, and encourages the Commission to not allow any further delay in approving the regulations.
- David Michaud
  - Generally, supports delivery regulations.
  - Supports the three year exclusivity period.
  - Suggests allowing up to 3 delivery licenses, like other license types.
  - Believes that delivery will not pull consumers way from Marijuana Retailers, but instead will encourage folks to purchase through the regulated market who otherwise obtain delivery by way of the illicit market.
    - Noted that by pulling those consumers into the regulated market benefits both the Commonwealth generally, as well as municipalities, through additional tax revenue.

The Commission took a 15 minute recess. Returned at – 4:58:40

- Eric Schwartz
  - Supports the draft delivery regulations and notes their importance in achieving the Commission’s equity mandate.
  - Criticized opponents to the draft regulations as anti-equity.



- Michael Nashawaty
  - Identified themselves as an Economic Empowerment applicant and a member of the social Equity program.
  - Supports the draft delivery regulations.
  - Believes that the solution to municipal concerns about lost tax revenue is to execute Host Community Agreements with Delivery Operator licensees.
- Angela Bradway
  - Identified themselves as a member of the Social Equity Program.
  - Generally, supports the delivery regulations and believes it will make headway in fulfilling the Commission's equity mandate.
  - Suggested additional revisions that could further the equity goals and more viable business models.
    - Eliminate the cap on the number of vehicles and warehouses.
    - Allow for a three license cap.
    - Extend the exclusivity period to five years.
- Chauncy Spencer
  - Suggests eliminating the 9pm cut off for hours of operations.
  - Suggests allowing any municipality-based limitation on hours of operation to be set out in the Host Community Agreement if the municipality has not had the chance to amend its zoning bylaws.
  - Believes concerns about large players overtaking the market are overblown.
- Judith Foster
  - Generally, supports the draft delivery regulations.
  - Expressed frustration with delay in the effect of the revised regulations.
  - Said that increased access to cannabis is good for the industry, so the additional of the delivery license types contribute to that.
- Max Piergallini
  - Supports both the Delivery Operator and Marijuana Courier licenses as an important step for social equity.
  - Argued against complaints that the Delivery Operator license would compete with Marijuana Retailers saying that competition is important to ensure the best possible product and value for consumers.
- Leon Porcher
  - Identified themselves as a microbusiness and Economic Empowerment Applicant.



- Generally, supports the draft delivery regulations and supports comments made in support so far.
- Believes that the concerns of an Amazon type delivery model are overblown but could be addressed through a longer or indefinite exclusivity period.
- Also believes the impact on brick and mortar stores will not be detrimental.
- Hillary King
  - Clarified that these were their views and opinions.
  - Generally, supports the draft delivery regulations with some suggested modifications.
    - Do not allow Third-Party Technology Platforms to have ownership or control interests in delivery businesses.
    - Scaled caps on businesses, akin to cultivation.
      - Believes some types of “guardrails” on both delivery types will be helpful once the exclusivity period is over.
    - Allow Repackaging to help delivery operators to develop their brand.
- Damon Schmidt
  - Identified themselves as a Social Equity Program participant.
  - Generally, supports the delivery regulations with a few modifications to support the longevity of the sector.
    - Believes limits on the number of vehicles will help ensure that there are no large players who are able to establish a large, Commonwealth-wide Real Estate Investment Trust and therefore vertically integrate production with Delivery.
    - Believes after the exclusivity period, there is room for Amazon or aggregator type delivery.
    - Believes that leases and other property agreements should be included in the definition of Control.
    - Believes a longer exclusivity period may help.
- Katie Neer
  - Believes Third-Party Technology Platforms will be key in the development of delivery.
  - Does not believe that a Third-Party Technology Platform should be listed on the license of a Delivery Operator, simply as the result of a service agreement.
  - Ensure transparency for consumers requiring disclosure of paid content on platforms.
- Tom Cataloni
  - Identified themselves as a Social Equity Program participant.
  - Supports the draft delivery regulations and believes it will advance equity in the state.
  - Supports extending the exclusivity period.
  - Suggests raising the cap on delivery licenses three licenses.
  - Sees benefits of vehicle limits to prevent domination by large operators.



- Believes that delivery licensees should be able to Repackage product.
- Ethan Vogt
  - Generally, supports the draft delivery regulations.
  - Believes the delivery regulations are a strong step forward in equity.
    - Supports the ability for Delivery Operators to Repackage.
  - Encouraged the Commission to consider the ability to deliver by bike messenger, both from an environmental perspective and reducing traffic on the roadways.
  - Asked that the Commission clarify that Delivery Operators can sell seeds and clones to support home grows.
- Shannon Jones
  - Identified themselves as an Economic Empowerment Applicant.
  - Expressed concern that Black drivers for delivery licensees will still be targeted by law enforcement.
  - Expressed frustration with the overwhelmingly white and male composition of the industry.
  - Encourages the Commission to take greater steps to reduce the barriers of entry, such as helping cover certain capital costs.
  - Suggests extending the exclusivity period to five years.
- Christian Pineda
  - Expressed support for the draft delivery regulations.
  - Noted that delivery can increase access to regulated marijuana, for folks who cannot afford to get a medical registration or for communities who are wary of the stigma surrounding marijuana, and therefore would not ask for a patient certification.
- Linda Noel
  - Identified herself as a Social Equity Program participant.
  - Expressed frustration with the delay in the approval of the regulations, especially given how long the industry has been waiting for equity.
  - Noted that municipalities can ensure they do not lose tax revenue as a result of delivery license by executing Host Community Agreements with such licensees.
  - Suggested that the Marijuana Courier license is an opportunity for Marijuana Retailers to reach new consumers who might otherwise be deterred, whether as the result of stigma or covid-19.
  - Doubted the likelihood that there would be market domination at the end of the exclusivity period, but also said that there would be opportunity for equity licensees to get a payout for selling their businesses at the time, which contributes to the equity mission.





- Mario Signore
  - Expressed frustration with the lack of equity in the cannabis industry.
  - Believes that the delivery licenses are key to establishing equity.
  - Believes the requirement that a second delivery agent be present in the vehicle is unnecessary and only increases costs without added safety.
- Jeffrey Shaheen
  - Identified themselves as a social Equity Program participant.
  - Supports the draft regulations for the most part.
  - Suggests bringing the license cap in line with other license types, limiting it to three licenses.
  - Discourages any limits on the number of vehicles.
- Brian Wall
  - Believes that delivery is only going to increase business for Retailers, noting that they may first access product through a delivery, but the ability for increased customer support at a retail location will ultimately drive many Consumers to the retail location.
  - Expressed the importance of delivery to the consumer experience.
  - Encouraged the Commission to establish a license cap in line with other license types, for a total of three delivery licenses.
  - Believes that Delivery Operators should be allowed to Repackage, and without that option, they are at a sales/cost disadvantage compared with Marijuana Retailers.
  - Opposes limits on the number of vehicles a delivery licensee may have, noting that there is no limit for the number of bud-tenders or Consumers put on a Marijuana Retailer.
  - Suggested allowing co-location of Delivery Operators with other license types.
- Megan Carvalho
  - Encouraged the Commission to consider the employees of delivery companies and ensure the jobs are safe and equitable.
- Evan Polmaritis
  - Generally, supports the draft delivery regulations and encourages the Commission to approve them as written.
- Oluseyi Obasa
  - Described their experience as a Patient facing the lack of diversity among the cannabis sector workforce, highlighting the importance of equity.
  - Believes the delivery regulations would advance equity in the industry.
  - Encourages the Commission extend the exclusivity period to a minimum of 5 years.
  - Urged the Commission to finalize Social Consumption regulations so that renters have a safe place to use cannabis without being ticketed for public consumption.



- Noted how there are barriers to getting a Patient card, because of jobs or other factors, and so people must rely on the adult-use industry to get their medicine, and Delivery can be a helpful aspect for that scenario.
- Carlha Toussaint
  - Believes delivery regulations are going to be key to bringing equity and offering a remedy for the disproportionate enforcement of cannabis prohibition and is not simply about the money potentially earned.

### 3) Next Meeting Date

- The Chairman gave an overview of the upcoming meeting schedule.
  - November 19, 2020 – Regularly Scheduled Public Meeting
  - November 30 – Public Meeting for vote on final regulations.

### 4) Adjournment

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



CANNABIS CONTROL COMMISSION

**November 19, 2020  
10:00AM**

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

PUBLIC MEETING MINUTES

**Documents:**

- Application materials associated with:
  - New England Craft Cultivators LLC
  - Pharmacannis Massachusetts, Inc.
  - Seven Point of Massachusetts, Inc.
  - Caregiver-Patient Connection LLC
  - Heka, Inc.
  - New England Cannabis Corporation, Inc. (#MCR139901)
  - New England Cannabis Corporation, Inc. (#MPR243541)
  - Ecofarm Leicester, LLC (#MCR139907)
  - Ecofarm Leicester, LLC (#MPR243545)
  - Theory Farms LLC (#MCR139903)
  - Four Daughters Compassionate Care, Inc. (#MPR243552)
  - Four Daughters Compassionate Care, Inc. (#MCR139915)
  - Four Daughters Compassionate Care, Inc. (#MRR205634)
  - 1620 Labs, LLC (#MCR139914)
  - Haverhill Stem LLC (#MRR205629)
  - Canna Provisions Inc (#MCR139899)
  - Good Chemistry of Massachusetts, Inc. (#MPR243551)
  - Good Chemistry of Massachusetts, Inc. (#MCR139906)
  - Good Chemistry of Mass (#MRR205633)
  - Greenstar Herbals, Inc. (#MRR205630)
  - Greenstar Herbals, Inc. (#MRR205631)
  - Temescal Wellness of Massachusetts, LLC (#MCR139910)
  - Temescal Wellness of Massachusetts, LLC (#MPR243548)
  - Gibby's Garden LLC (#MBR169266)
  - M3 Ventures, Inc. (#MRR205626)
  - M3 Ventures, Inc. (#MPR243549)
  - M3 Ventures, Inc. (#MCR139904)



- TDMA Orange LLC (#MCR139912)
- TDMA Orange LLC (#MCR139913)
- TDMA Orange LLC (#MPR243550)
- Native Sun MFG, LLC (#MCR139917)
- Just Healthy LLC (#MCR139916)
- Just Healthy LLC (#MPR243553)
- Just Healthy LLC (#MRR205635)
- Revolutionary Clinics II, Inc. (#MCR139908)
- Revolutionary Clinics II, Inc. (#MPR243546)
- Berkshire Welco LLC (#MCR139920)
- Pleasantrees, Inc. (#MRR205637), Retail
- Caregiver-Patient Connection LLC (#MCR139924)
- Caregiver-Patient Connection LLC (#MCR139927)
- Garden Remedies, Inc. (#MCR139923)
- Garden Remedies, Inc. (#MPR243560)
- Green Biz LLC (#MRR205640)
- Berkshire Roots, Inc. (#MCR139918)
- Berkshire Roots, Inc. (#MRR205638)
- Berkshire Roots, Inc. (#MXR126657)
- Berkshire Roots, Inc. (#MPR243555)
- Jolo Can LLC (#MCR139922)
- Jolo Can LLC (#MPR243558)
- Jolo Can LLC (#MRR205639)
- The Green Lady Dispensary, Inc. (#MPR243556)
- The Green Lady Dispensary, Inc. (#MRR205639)
- 1622 Medical, LLC, Vertically Integrated Medical Marijuana Treatment
- Apothca, Inc. (#RMD345)
- Apothca, Inc. Vertically Integrated Medical Marijuana Treatment Center
- Apothca, Inc. (#RMD1065)
- ARL Healthcare, Inc. (#RMD485)
- Coastal Healing, Inc. Vertically Integrated Medical Marijuana Treatment Center
- Cultivate Holdings, LLC (#RMD485)
- Garden Remedies, Inc. (#RMD1265)
- Healthy Pharms, Inc. (#RMD545)
- Holistic Industries (#RMD685)
- Life Essence, Inc., Vertically Integrated Medical Marijuana Treatment Center (Holyoke-Cambridge)
- Life Essence, Inc., Vertically Integrated Medical Marijuana Treatment Center (Holyoke-Holyoke)
- Life Essence, Inc. (#RMD1365)
- Massmedicum Corp., (#RMD945)



- Middlesex Integrative Medicine, Inc. (#RMD1025)
- Nature's Remedy of Massachusetts, Inc. (#RMD1285)
- Patient Centric of Martha's Vineyard, Ltd. (#RMD1165)
- Patriot Care Corp. (#RMD265)
- Patriot Care Corp. (#RMD727)
- Resinate, Inc. (#RMD1345)
- Revolutionary Clinics II, (#RMD405)
- Sanctuary Medicinals, Inc. (#RMD1128)
- Sanctuary Medicinals, Inc. (#RMD605)
- The Botanist, Inc. (#RMD1145)
- Aries Laboratory, LLC (#IL281325), Independent Testing Laboratory
- Atlas Marketplace & Delivery, LLC (#MT281393), Third-Party Transporter
- Berkshire Welco, LLC (#MC281949), Cultivation, Tier 7 / Outdoor
- Canna Provisions Inc (#MC281970), Cultivation, Tier 1 / Indoor
- CNA Stores, Inc. (#MR282576), Retail
- CTDW, LLC (#MR281844), Retail
- EOS-Bittersweet, LLC (#MC281338), Cultivation, Tier 2 / Indoor
- EOS-Bittersweet, LLC (#MC282296), Cultivation, Tier 10 / Outdoor
- High Hawk Farm, LLC (#MC282412), Cultivation, Tier 11 / Outdoor
- Highminded, LLC (#MP281662), Product Manufacturer
- Highminded, LLC (#MR282318), Retail
- Holistic Industries, Inc. (#MC282056), Cultivation, Tier 3 / Indoor
- Holistic Industries, Inc. (#MP281630), Product Manufacturer
- Hudson Botanical Processing, LLC (#MP281588), Product Manufacturer
- Liberty Compassion, Inc. (#MC282178), Cultivation, Tier 2 / Indoor
- Liberty Compassion, Inc. (#MP281752), Product Manufacturer
- Life Essence, Inc. (#MR282981), Retail
- Lynn Organics, LLC (#MR282618), Retail
- Munro Associates, LLC (#MR282814), Retail
- Native Sun Wellness, Inc. (#MR281800), Retail
- Nature's Medicine, Inc. (#MR281701), Retail
- Nature's Medicine, Inc. (#MR281709), Retail
- NS AJO Holdings Inc. (#MR283095), Retail
- Liberty Compassion. Inc. (#MTC1586), Vertically Integrated Medical Marijuana Treatment Center
- Life Essence, Inc. (#MTC1365), Vertically Integrated Medical Marijuana Treatment Center
- Aspen Blue Cultures, Inc. (#RMDA3032), Vertically Integrated Medical Marijuana Treatment Center
- 1Connection Corp. (#MCN282245), Cultivation, Tier 3 / Indoor
- 1Connection Corp. (#MPN281717), Product Manufacturer



- 1Connection Corp. (#MRN282401), Retail
- 4Bros, Inc. (#MCN281814), Cultivation, Tier 3 / Indoor
- 4Bros, Inc. (#MPN281543), Product Manufacturer
- 4Bros, Inc. (#MRN281550), Retail
- Agricultural Healing, Inc. (#MCN282370), Cultivation, Tier 11 / Indoor
- Agricultural Healing, Inc. (#MPN281769), Product Manufacturer
- Agricultural Healing, Inc. (#MRN283027), Retail
- AmeriCann Brands, Inc. (#MCN282714), Cultivation, Tier 9 / Indoor
- AmeriCann Brands, Inc. (#MPN281531), Product Manufacturer
- ATOZ Laboratories, Inc. (#ILN281335), Independent Testing Laboratory
- BB Botanics, LLC (#MCN282817), Cultivation, Tier 1 / Indoor
- BB Botanics, LLC (#MRN282084), Retail
- BWell Holdings, Inc. (#MPN281725), Product Manufacturer
- Cannabro, LLC (#MRN283743), Retail
- Caroline's Cannabis (#MRN283694), Retail
- CCC Mashpee Holdings, LLC (#MCN282720), Cultivation, Tier 2 / Indoor
- CCC Mashpee Holdings, LLC (#MPN281883), Product Manufacturer
- Community Care Collective, Inc. (#MRN283742), Retail
- Community Gardens, LLC (#MCN282848), Cultivation, Tier 5 / Indoor
- Community Gardens, LLC (#MPN281899), Product Manufacturer
- Cosmopolitan Dispensary, Inc. (#MRN282961), Retail
- DBA EMJ, LLC (#MCN282135), Cultivation, Tier 1 / Indoor
- Emerald City Growers Incorporated (#MCN281618), Cultivation, Tier 2 / Indoor
- High Five, Inc. (#MPN281787), Product Manufacturer
- Metro Harvest, Inc. (#MRN283470), Retail
- MMM Transport, Inc. (#MTN281556), Third-Party Transporter
- Nature's Alternative, Inc. (#MRN283325), Retail
- Northeast Alternatives, Inc. (#MCN282112), Cultivation, Tier 6 / Indoor
- RC Retail Amherst, LLC (#MRN282975), Retail
- Regenerative LLC (#MCN282958), Cultivation, Tier 10 / Outdoor
- Sparkboro Corp. (#MCN282681), Cultivation, Tier 2 / Indoor
- Sparkboro Corp. (#MPN281852), Product Manufacturer
- Spencer House, LLC (#MPN281886), Product Manufacturer
- The Green Harbor Dispensary, LLC (#MCN281264), Cultivation, Tier 2 / Indoor
- The Green Harbor Dispensary, LLC (#MRN283220), Retail
- Tree Market Lynn, LLC (#MRN282587), Retail
- Twisted Growers LLC (#MCN281714), Cultivation, Tier 11 / Indoor
- Twisted Growers LLC (#MPN281909), Product Manufacturer
- We Can Deliver Boston, LLC (#DOA100109), Delivery-Only
- ACTA LLC
- Tessi Consulting



- Sinsemilla Seminars
- Research Report on Adult and Emerging Adult Cannabis Use
- Meeting packet

**In Attendance:**

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

**Minutes:**

- 1) Call to Order
  - The Chairman recognized a quorum and called the meeting to order.
  - The Chairman gave notice that the meeting is being recorded.
- 2) Chairman's Comments and Updates
  - The Chairman gave an overview of the agenda.
  - The Chairman gave an overview of the anticipated presentation on Adult and Emerging Adult Cannabis Use report by the Commission's Research department.
  - The Chairman gave an overview of the anticipated Executive Director goals discussion.
  - The Chairman gave an overview of the anticipated Amicus Brief Authorization discussion.
  - The Chairman gave an overview of the anticipated Delivery Regulations discussion.
  - The Chairman gave an overview of the anticipated Executive Session.
- 3) Minutes for Approval– 0:02:50
  - The Chairman noted there were two sets of minutes to approve.
  - August 3, 2020
    - The Chairman asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
    - Commissioner Flanagan moved to approve the minutes.
    - Commissioner McBride seconded the motion.
    - The Commission unanimously approved the minutes.
  - August 6, 2020
    - The Chairman asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
    - Commissioner Flanagan moved to approve the minutes.
    - Commissioner McBride seconded the motion.
    - The Commission unanimously approved the minutes.



4) Executive Director's Report – 0:04:50

- The Executive Director gave an overview of licensing data, as laid out on [Page 288 of the Meeting packet](#).

5) Staff Recommendations on Changes of Ownership – 0:12:40

a. New England Craft Cultivators LLC

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

b. Pharmacannis Massachusetts, Inc.

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

c. Seven Point of Massachusetts, Inc.

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

6) Staff Recommendations on Changes of Location - 0:16:51

a. Caregiver-Patient Connection LLC

- Director Potvin presented the Staff Recommendation for Change of Location.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the Change of Location.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously voted to approve the Change of Location.

b. Heka, Inc.

- Director Potvin presented the Staff Recommendation for Change of Location.





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

#### 7) Staff Recommendations on Renewals – 0:19:55

- The Chairman noted that renewals will be done as four rosters, (1) all adult-use licenses, except those from which Commissioner Title is recusing herself, (2) adult-use licenses from which Commissioner Title is recusing herself, (3) all medical-use licenses, except those from which Commissioner Title is recusing herself, and (4) medical-use licenses from which Commissioner Title is recusing herself.
  -
- Roster of remaining adult use Renewals.
  - The Chairman asked for questions or comments.
  - Commissioner McBride moved to approve the roster of Renewals.
  - Commissioner Flanagan seconded the motion.
  - The Commission unanimously voted to approve the roster of Renewals.
- Those adult use licenses for which Commissioner Title recused herself.
  - The Chairman asked for questions or comments.
  - Commissioner Flanagan moved to approve the roster of Renewals.
  - Commissioner McBride seconded the motion.
  - The Commission voted to approve the roster of Renewals by a vote of three in favor (Flanagan, Hoffman, McBride) and one recusal (Title).
  -
- Roster of all remaining medical use Renewals.
  - The Chairman asked for questions or comments.
  - Commissioner McBride moved to approve the roster of Renewals.
  - Commissioner Flanagan seconded the motion.
  - The Commission unanimously voted to approve the roster of Renewals.
- Roster of medical use licenses for which Commissioner Title recused herself.
  - The Chairman asked for questions or comments.
  - Commissioner McBride moved to approve the roster of Renewals.
  - Commissioner Flanagan seconded the motion. The Commission voted to approve the roster of Renewals by a vote of three in favor (Flanagan, Hoffman, McBride) and one recusal (Title).

#### a. New England Cannabis Corporation, Inc. (#MCR139901)



b. New England Cannabis Corporation, Inc. (#MPR243541)  
c. Ecofarm Leicester, LLC (#MCR139907)  
d. Ecofarm Leicester, LLC (#MPR243545)  
e. Theory Farms LLC (#MCR139903)  
f. Four Daughters Compassionate Care, Inc. (#MPR243552)  
g. Four Daughters Compassionate Care, Inc. (#MCR139915)  
h. Four Daughters Compassionate Care, Inc. (#MRR205634)  
i. 1620 Labs, LLC (#MCR139914)  
j. Haverhill Stem LLC (#MRR205629)  
k. Canna Provisions Inc (#MCR139899)  
l. Good Chemistry of Massachusetts, Inc. (#MPR243551)  
m. Good Chemistry of Massachusetts, Inc. (#MCR139906)  
n. Good Chemistry of Mass (#MRR205633)  
o. Greenstar Herbals, Inc. (#MRR205630)  
p. Greenstar Herbals, Inc. (#MRR205631)  
q. Temescal Wellness of Massachusetts, LLC (#MCR139910)  
r. Temescal Wellness of Massachusetts, LLC (#MPR243548)  
s. Gibby's Garden LLC (#MBR169266)  
t. M3 Ventures, Inc. (#MRR205626)  
u. M3 Ventures, Inc. (#MPR243549)  
v. M3 Ventures, Inc. (#MCR139904)  
w. TDMA Orange LLC (#MCR139912)  
x. TDMA Orange LLC (#MCR139913)  
y. TDMA Orange LLC (#MPR243550)  
z. Native Sun MFG, LLC (#MCR139917)  
aa. Just Healthy LLC (#MCR139916)  
bb. Just Healthy LLC (#MPR243553)  
cc. Just Healthy LLC (#MRR205635)  
dd. Revolutionary Clinics II, Inc. (#MCR139908)  
ee. Revolutionary Clinics II, Inc. (#MPR243546)  
ff. Berkshire Welco LLC (#MCR139920)  
gg. Pleasantrees, Inc. (#MRR205637), Retail  
hh. Caregiver-Patient Connection LLC (#MCR139924)  
ii. Caregiver-Patient Connection LLC (#MCR139927)  
jj. Garden Remedies, Inc. (#MCR139923)  
kk. Garden Remedies, Inc. (#MPR243560)  
ll. Green Biz LLC (#MRR205640)  
mm. Berkshire Roots, Inc. (#MCR139918)  
nn. Berkshire Roots, Inc. (#MRR205638)  
oo. Berkshire Roots, Inc. (#MXR126657)  
pp. Berkshire Roots, Inc. (#MPR243555)



qq. Jolo Can LLC (#MCR139922)  
 rr. Jolo Can LLC (#MPR243558)  
 ss. Jolo Can LLC (#MRR205639)  
 tt. The Green Lady Dispensary, Inc. (#MPR243556)  
 uu. The Green Lady Dispensary, Inc. (#MRR205639) (End of Adult Use)  
 vv. 1622 Medical, LLC, Vertically Integrated Medical Marijuana Treatment  
 ww. Apothca, Inc. (#RMD345)  
 xx. Apothca, Inc. Vertically Integrated Medical Marijuana Treatment Center  
 yy. Apothca, Inc. (#RMD1065)  
 zz. ARL Healthcare, Inc. (#RMD485)  
 aaa. Coastal Healing, Inc. Vertically Integrated Medical Marijuana Treatment Center  
 bbb. Cultivate Holdings, LLC (#RMD485)  
 ccc. Garden Remedies, Inc. (#RMD1265)  
 ddd. Healthy Pharms, Inc. (#RMD545)  
 eee. Holistic Industries (#RMD685)  
 fff. Life Essence, Inc., Vertically Integrated Medical Marijuana Treatment Center (Holyoke-Cambridge)  
 ggg. Life Essence, Inc., Vertically Integrated Medical Marijuana Treatment Center (Holyoke-Holyoke)  
 hhh. Life Essence, Inc. (#RMD1365)  
 iii. Massmedicum Corp., (#RMD945)  
 jjj. Middlesex Integrative Medicine, Inc. (#RMD1025)  
 kkk. Nature's Remedy of Massachusetts, Inc. (#RMD1285)  
 ll. Patient Centric of Martha's Vineyard, Ltd. (#RMD1165)  
 mmm. Patriot Care Corp. (#RMD265)  
 nnn. Patriot Care Corp. (#RMD727)  
 ooo. Resinate, Inc. (#RMD1345)  
 ppp. Revolutionary Clinics II, (#RMD405)  
 qqq. Sanctuary Medicinals, Inc. (#RMD1128)  
 rrr. Sanctuary Medicinals, Inc. (#RMD605)  
 sss. The Botanist, Inc. (#RMD1145)

#### 8) Staff Recommendations on Final Licenses – 0:26:15

- The Chairman noted that Final Licenses will be considered as two rosters: (1) being all final license applications except for the two licenses for Nature's Medicine and (2) the two Nature's Medicine Final License applications.
- First roster.
  - The Chairman asked for questions or comments.
  - Commissioner McBride moved to approve the roster of Renewals.
  - Commissioner Flanagan seconded the motion.
  - The Commission unanimously voted to approve the roster of Renewals.



- a. Aries Laboratory, LLC (#IL281325), Independent Testing Laboratory
- b. Atlas Marketplace & Delivery, LLC (#MT281393), Third-Party Transporter
- c. Berkshire Welco, LLC (#MC281949), Cultivation, Tier 7 / Outdoor
- d. Canna Provisions Inc (#MC281970), Cultivation, Tier 1 / Indoor
- e. CNA Stores, Inc. (#MR282576), Retail
- f. CTDW, LLC (#MR281844), Retail
- g. EOS-Bittersweet, LLC (#MC281338), Cultivation, Tier 2 / Indoor
- h. EOS-Bittersweet, LLC (#MC282296), Cultivation, Tier 10 / Outdoor
- i. High Hawk Farm, LLC (#MC282412), Cultivation, Tier 11 / Outdoor
- j. Highminded, LLC (#MP281662), Product Manufacturer
- k. Highminded, LLC (#MR282318), Retail
- l. Holistic Industries, Inc. (#MC282056), Cultivation, Tier 3 / Indoor
- m. Holistic Industries, Inc. (#MP281630), Product Manufacturer
- n. Hudson Botanical Processing, LLC (#MP281588), Product Manufacturer
- o. Liberty Compassion, Inc. (#MC282178), Cultivation, Tier 2 / Indoor
- p. Liberty Compassion, Inc. (#MP281752), Product Manufacturer
- q. Life Essence, Inc. (#MR282981), Retail
- r. Lynn Organics, LLC (#MR282618), Retail
- s. Munro Associates, LLC (#MR282814), Retail
- t. Native Sun Wellness, Inc. (#MR281800), Retail
- u. Nature's Medicine, Inc. (#MR281701), Retail
- v. Nature's Medicine, Inc. (#MR281709), Retail
- w. NS AJO Holdings Inc. (#MR283095), Retail
- x. Liberty Compassion. Inc. (#MTC1586), Vertically Integrated Medical Marijuana Treatment Center
- y. Life Essence, Inc. (#MTC1365), Vertically Integrated Medical Marijuana Treatment Center

- The Chairman moved to enter into Executive Session to discuss, under Purpose (3) of the Open Meeting Law, to discuss privileged matters and litigation strategy associated with Nature's Medicines, Inc. v. Cannabis Control Commission; filed in Worcester Superior Court, and Northeast Alternatives Inc. v. Cannabis Control Commission, in Suffolk Superior Court; and under Purpose (7), of the Open Meeting Law, to protect information subject to the Second Amended Protective Order entered in the matter of United States v. Correia & another, filed in federal district court, and issued under Federal Rule of Civil Procedure 26(c), and promulgated under 28 U.S.C. § 2072; and under the Public Records Law, G.L. c. 66, and the exemptions set forth in G.L. c. 4, § 7(26)(a), (d) and (f)
- The Chairman noted that the Commission will return to Open Session after its Executive Session Deliberations and identified Commission staff who would be present for the Executive Session discussion.
- Commissioner McBride seconded the motion.



- The Commission unanimously voted to enter Executive Session and each Commissioner affirmed that no one could hear the deliberations of Executive Session.

The Commission entered Executive Session – 0:30:30

The Commission returned to Open Session – 4:49:50

- The Chairman stated for the record that in Executive Session the Commission considered the second roster and approved the Final Licenses subject to a condition, that will remain confidential due to the Second Protective Order.

9) Staff Recommendations on Provisional Licenses – 4:50:50

- The Chairman noted that the Commission considers provisional licenses separately but will group together applications from the same entity for the sake of the remote meeting.
- a. Aspen Blue Cultures, Inc. (#RMDA3032), Vertically Integrated Medical Marijuana Treatment Center
    - Director Potvin presented the Staff Recommendation for Provisional License.
    - The Chairman asked for questions or comments.
    - Commissioner Flanagan moved to approve the Provisional License.
    - Commissioner McBride seconded the motion.
    - The Commission unanimously voted to approve the Provisional License.
  - b. 1Connection Corp. (#MCN282245), Cultivation, Tier 3 / Indoor
  - c. 1Connection Corp. (#MPN281717), Product Manufacturer
  - d. 1Connection Corp. (#MRN282401), Retail
    - Director Potvin presented the Staff Recommendation for all three Provisional License applications for 1Connection Corp.
    - The Chairman asked for questions or comments.
    - Commissioner McBride moved to approve all three Provisional Licenses.
    - Commissioner Title seconded the motion.
    - The Commission unanimously voted to approve all three Provisional Licenses.
  - e. 4Bros, Inc. (#MCN281814), Cultivation, Tier 3 / Indoor
  - f. 4Bros, Inc. (#MPN281543), Product Manufacturer
  - g. 4Bros, Inc. (#MRN281550), Retail
    - Director Potvin presented the Staff Recommendation for all three Provisional License applications for 4Bros, Inc.
    - Commissioner McBride requested a condition.



- Proposed Condition: Prior to final licensure applicant shall update the Security Plans for all license applications to reflect correct references to the Medical-Use Regulations at 935 CMR 501.000.
- Commissioner Flanagan requested a condition.
  - Proposed conditions:
    - Clarify information with respect to training and internship program including:
      - Is there a defined curriculum?
      - How many courses/training sessions per year
      - What topics will be addressed during program?
    - Clarify the meaning of “social equity responsibility.”
      - Will the “resources, training and guidance” be for people seeking jobs or those trying to start a business?
    - Clarification on community cleanup.
      - Who is the “community partner” for this initiative?
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve all three Provisional Licenses, subject to the conditions requested by Commissioners McBride and Flanagan.
- Commissioner McBride seconded the motion.
- The Commission unanimously voted to approve all three Provisional Licenses, subject to the conditions requested by Commissioners McBride and Flanagan.

h. Agricultural Healing, Inc. (#MCN282370), Cultivation, Tier 11 / Indoor

i. Agricultural Healing, Inc. (#MPN281769), Product Manufacturer

j. Agricultural Healing, Inc. (#MRN283027), Retail

- Director Potvin presented the Staff Recommendation for all three Provisional License applications for Agricultural Healing, Inc.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve all three Provisional Licenses.
- Commissioner Title seconded the motion.
- The Commission unanimously voted to approve all three Provisional Licenses.

k. AmeriCann Brands, Inc. (#MCN282714), Cultivation, Tier 9 / Indoor

l. AmeriCann Brands, Inc. (#MPN281531), Product Manufacturer

- Director Potvin presented the Staff Recommendation for both Provisional License applications for AmeriCann Brands, Inc.
- The Chairman asked for questions or comments.
- Commissioner Flanagan moved to approve both Provisional Licenses.
- Commissioner McBride seconded the motion.
- The Commission unanimously voted to approve both Provisional Licenses.



- m. ATOZ Laboratories, Inc. (#ILN281335), Independent Testing Laboratory
- Director Potvin presented the Staff Recommendation for Provisional License.
  - Commissioner McBride requested a condition.
    - Proposed Condition: The Applicant shall correct the Transportation Plan to accurately reflect the requirements of 935 CMR 500.105 (13)(d): Storage Requirements.
  - Commissioner Flanagan requested a condition.
    - Proposed condition: Clarify how a donation to CultivatEd will directly impact residents of Fitchburg.
  - The Chairman asked for questions or comments.
  - Commissioner Title moved to approve the Provisional License, subject to the conditions requested by Commissioners McBride and Flanagan.
  - Commissioner Flanagan seconded the motion.
  - The Commission unanimously voted to approve the Provisional License, subject to the conditions requested by Commissioners McBride and Flanagan.
- n. BB Botanics, LLC (#MCN282817), Cultivation, Tier 1 / Indoor
- o. BB Botanics, LLC (#MRN282084), Retail
- Director Potvin presented the Staff Recommendation for both Provisional License applications for BB Botanics, LLC
  - Commissioner Flanagan requested a condition.
    - Proposed condition: Resubmit plan to include more than hiring.
  - The Chairman asked for questions or comments.
  - Commissioner Title moved to approve both Provisional License, subject to the conditions requested by Commissioner Flanagan.
  - Commissioner McBride seconded the motion.
  - The Commission unanimously voted to approve both Provisional Licenses, subject to the conditions requested by Commissioner Flanagan.
- p. BWell Holdings, Inc. (#MPN281725), Product Manufacturer
- Director Potvin presented the Staff Recommendation for Provisional License.
  - Commissioner Flanagan requested a condition.
    - Proposed condition: Resubmit plan to include more than hiring.
  - The Chairman asked for questions or comments.
  - Commissioner Flanagan moved to approve the Provisional License, subject to the condition requested by Commissioner Flanagan.
  - Commissioner McBride seconded the motion.
  - The Commission unanimously voted to approve the Provisional License, subject to the conditions requested by Commissioner Flanagan.
- q. Cannabro, LLC (#MRN283743), Retail





- Director Potvin presented the Staff Recommendation for the Provisional License.
- Commissioner Title requested a condition.
  - Proposed condition: Revise diversity plan goal to "recruit 10% minorities, 10% women, and 10% Veterans for its hiring initiatives" to be objectively reasonable.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the Provisional License, subject to the conditions requested by Commissioner Title.
- Commissioner Title seconded the motion.
- The Commission unanimously voted to approve the Provisional Licenses, subject to the conditions requested by Commissioner Title.

r. Caroline's Cannabis (#MRN283694), Retail

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

s. CCC Mashpee Holdings, LLC (#MCN282720), Cultivation, Tier 2 / Indoor

t. CCC Mashpee Holdings, LLC (#MPN281883), Product Manufacturer

- Director Potvin presented the Staff Recommendation for Provisional License.
- Commissioner McBride requested a condition:
  - Proposed condition: Applicant shall prior to Final Licensure amend section 3.7 of its Security Plan to address the discrepancy in the section's final sentence.
- The Chairman asked for questions or comments.
- Commissioner Flanagan moved to approve both Provisional Licenses, subject to the conditions requested by Commissioner McBride.
- Commissioner McBride seconded the motion.
- The Commission unanimously voted to approve both Provisional Licenses, subject to the condition requested by Commissioner McBride.

u. Community Care Collective, Inc. (#MRN283742), Retail

- Director Potvin presented the Staff Recommendation for Provisional License.
- Commissioner Flanagan requested a condition.
  - Proposed Condition: Resubmit plan to include more than hiring.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the Provisional License, subject to the condition requested by Commissioner Flanagan.
- Commissioner Title seconded the motion.





- The Commission unanimously voted to approve the Provisional License, subject to the condition requested by Commissioner Flanagan.

v. Community Gardens, LLC (#MCN282848), Cultivation, Tier 5 / Indoor

w. Community Gardens, LLC (#MPN281899), Product Manufacturer

- Director Potvin presented the Staff Recommendation for both Provisional License applications of Community Gardens, LLC.
- Commissioner McBride requested a condition.
  - Proposed Condition: Applicant shall, prior to Final Licensure, make any specific requests for Alternate Security Provisions in the form of a Waiver Request, which shall be subject to the provisions of 935 CMR 500.110(2).
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve both Provisional Licenses, subject to the condition requested by Commissioner McBride.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously voted to approve both Provisional Licenses, subject to the condition requested by Commissioner McBride.

x. Cosmopolitan Dispensary, Inc. (#MRN282961), Retail

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

y. DBA EMJ, LLC (#MCN282135), Cultivation, Tier 1 / Indoor

- Director Potvin presented the Staff Recommendation for Provisional License.
- The Chairman asked for questions or comments.
- Commissioner Flanagan moved to approve the Provisional License.
- Commissioner McBride seconded the motion.
- The Commission unanimously voted to approve the Provisional License.

z. Emerald City Growers Incorporated (#MCN281618), Cultivation, Tier 2 / Indoor

- Director Potvin presented the Staff Recommendation for Provisional License.
- Commissioner Flanagan requested three conditions.
  - Proposed conditions:
    - Resubmit plan to include more than hiring.
    - Specify which cohort you are seeking to impact.
    - Clarify how a donation to MRCC will directly impact the specified cohort.
- Commissioner Title requested a condition.



- Proposed condition: Revise diversity plan goal to "give hiring preference to women (5%) and minorities (5%)" to be objectively reasonable.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the Provisional License, subject to the conditions requested by Commissioners Flanagan and Title.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously voted to approve the Provisional License, subject to the conditions requested by Commissioners Flanagan and Title.

aa. High Five, Inc. (#MPN281787), Product Manufacturer

- Director Potvin presented the Staff Recommendation for Provisional License.
- Commissioner Title requested two conditions.
  - Proposed conditions:
    - Revise diversity plan goal to "Recruit 20% or more of women and/or veterans in retail and management positions" to be objectively reasonable.
    - Clarify what is meant by "retail and management positions" for a cultivation application.
- The Chairman asked for questions or comments.
- Commissioner Flanagan moved to approve the Provisional License, subject to the condition requested by Commissioner Title.
- Commissioner McBride seconded the motion.
- The Commission unanimously voted to approve the Provisional License, subject to the condition requested by Commissioner Title.

bb. Metro Harvest, Inc. (#MRN283470), Retail

- Director Potvin presented the Staff Recommendation for Provisional License.
- Commissioner Flanagan requested two conditions.
  - Proposed conditions: Resubmit plan to include more than hiring.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the Provisional License, subject to the condition requested by Commissioner Flanagan.
- Commissioner Title seconded the motion.
- The Commission unanimously voted to approve the Provisional License, subject to the condition requested by Commissioner Flanagan.

cc. MMM Transport, Inc. (#MTN281556), Third-Party Transporter

- Director Potvin presented the Staff Recommendation for Provisional License.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve the Provisional License.
- Commissioner Flanagan seconded the motion.



- The Commission unanimously voted to approve the Provisional License.

dd. Nature's Alternative, Inc. (#MRN283325), Retail

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

ee. Northeast Alternatives, Inc. (#MCN282112), Cultivation, Tier 6 / Indoor

- The Chairman noted for the record that in Executive Session the Commission voted to deem the application of Northeast Alternatives incomplete based on the information before the Commission as presented by the Associate Enforcement Counsel, which constitutes a material change, the material change being new evidence found through staff's review of investigative reports entered into evidence in the matter of US v. Correia & another, which raises the likelihood of a suitability issue and the need for further investigation, and could constitute the basis for a denial of the application; and further that the application be remanded to investigations staff for continued assessment of suitability and that the application be returned to the Commission at such time as a full assessment by Commission staff of suitability of the applicant is concluded and the application is deemed Complete.

ff. RC Retail Amherst, LLC (#MRN282975), Retail

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

gg. Regenerative LLC (#MCN282958), Cultivation, Tier 10 / Outdoor

- Director Potvin presented the Staff Recommendation for Provisional License.
- The Chairman asked for questions or comments.
- Commissioner Flanagan moved to approve the Provisional License.
- Commissioner McBride seconded the motion.
- The Commission unanimously voted to approve the Provisional License.

hh. Sparkboro Corp. (#MCN282681), Cultivation, Tier 2 / Indoor

ii. Sparkboro Corp. (#MPN281852), Product Manufacturer

- Director Potvin presented the Staff Recommendation for both Provisional License applications for Sparkboro Corp.
- Commissioner Flanagan requested three conditions.



- Proposed conditions:
  - Resubmit plan to include more than hiring.
  - Specify which cohort you are seeking to impact.
  - Clarify how a donation to New England Veterans Alliance will have a direct impact on specified cohort.
- Commissioner Title requested a condition.
  - Proposed condition: Revise diversity plan goal to "give hiring preference to women (5%) and minorities (5%)" to be objectively reasonable.
- The Chairman asked for questions or comments.
- Commissioner Title moved to approve both Provisional Licenses, subject to the conditions requested by Commissioners Flanagan and Title.
- Commissioner Flanagan seconded the motion.
- The Commission unanimously voted to approve both Provisional Licenses, subject to the conditions requested by Commissioners Flanagan and Title.

jj. Spencer House, LLC (#MPN281886), Product Manufacturer

- Director Potvin presented the Staff Recommendation for Provisional License.
- Commissioner Flanagan requested a condition.
  - Proposed condition: Resubmit plan to include more than hiring.
- The Chairman asked for questions or comments.
- Commissioner Flanagan moved to approve the Provisional License, subject to the condition requested by Commissioner Flanagan.
- Commissioner McBride seconded the motion.
- The Commission unanimously voted to approve the Provisional License, subject to the condition requested by Commissioner Flanagan.

kk. The Green Harbor Dispensary, LLC (#MCN281264), Cultivation, Tier 2 / Indoor

ll. The Green Harbor Dispensary, LLC (#MRN283220), Retail

- Director Potvin presented the Staff Recommendation for both Provisional License applications for The Green Harbor Dispensary, LLC.
- Commissioner Title requested a condition.
  - Proposed condition: Revise diversity plan goal to "comprise a workforce of no less than 20% of its employees being [women and other identified groups]" to be objectively reasonable.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve both Provisional Licenses, subject to the condition requested by Commissioner Title.
- Commissioner Title seconded the motion.
- The Commission unanimously voted to approve both Provisional Licenses, subject to the condition requested by Commissioner Title.



mm. Tree Market Lynn, LLC (#MRN282587), Retail

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

nn. Twisted Growers LLC (#MCN281714), Cultivation, Tier 11 / Indoor

oo. Twisted Growers LLC (#MPN281909), Product Manufacturer

- Director Potvin presented the Staff Recommendation for both Provisional License applications for Twisted Growers LLC.
- Commissioner Flanagan requested a condition.
  - Proposed condition: Resubmit plan to include more than hiring.
- The Chairman asked for questions or comments.
- Commissioner Flanagan moved to approve both Provisional Licenses, subject to the condition requested by Commissioner Flanagan.
- Commissioner McBride seconded the motion.
- The Commission unanimously voted to approve both Provisional Licenses, subject to the condition requested by Commissioner Flanagan.

pp. We Can Deliver Boston, LLC (#DOA100109), Delivery-Only

- Director Potvin presented the Staff Recommendation for Provisional License.
- Commissioner McBride requested a condition.
  - Proposed condition: Prior to final licensure, the Applicant, DOA100109, shall submit an amended Delivery Plan that includes additional information about how the Applicant plans to operationalize deliveries, such as the plan if they cannot find parking; the plan for notifying the consumer of arrival; and other details specific to the time period immediately preceding and up to the culmination of the transaction with the consumer.
- The Chairman asked for questions or comments.
- Commissioner McBride moved to approve the Provisional License, subject to the condition requested by Commissioner McBride.
- Commissioner Title seconded the motion.
- The Commission unanimously voted to approve the Provisional License, subject to the Condition requested by Commissioner McBride.

10) Staff Recommendations on Responsible Vendor Training – 5:32:40

- The Executive Director gave an overview of the Responsible Vendor Training (RVT) discussion and presented the RVT recommendations, to be voted on as a roster. This round of applications



has produced three for consideration today and five other applicants are being reopened for additional information.

a. ACTA LLC

b. Tessi Consulting

c. Sinsemilla Seminars

- Commissioner Flanagan moved to approve all three RVT applications.
- Commissioner McBride seconded the motion.
- The Commission unanimously approved the RVT applications.

The Commission took a five minute recess, returning at – 5:41:00

11) Presentation of Research Report on Adult and Emerging Adult Cannabis Use

- Dr. Julie Johnson, Director of Research, and Samantha Doonan, Data Analyst, presented the report about cannabis use, ease of access, mode of use, sources, riding and driving behavior, perceptions.
- Commissioner Flanagan thanked Dr. Johnson and Ms. Doonan for the work.
- Commissioner McBride asked if there is a common definition for the illicit market that is used in this report or generally in order to contextualize information relating to the illicit market.
  - Dr. Johnson said that there may be a distinction between legal production, legal sale, and the gray (legally produced but illegally sold) and illicit market. She stated that this data is the best source for the illicit market and dealing. Parsing that out will require ongoing assessment and research.

12) Commission Discussion and Votes - 6:00:00

a. Executive Director Goals

- The Chairman gave an overview of the topic.
- The Executive Director went over the previous year's goals and measurement of success.
- Commissioner Flanagan noted that the goals and report on progress are helpful and important but do not capture all the additional work that gets done.
- Commissioner Title suggested a goal concerning new Commissioners and a process for on-boarding and a cultural discussion of how they fit into the agency.
- The Executive Director gave an overview of the proposed goals discussed between the Chair and Executive Director for calendar year 2020-2021.
- Commissioner Flanagan said she would like some time to flesh out Goal number four with some strategic planning and measurable goals.
- Commissioner McBride concurred with the suggestions made by Commissioners Flanagan and Title.
- Commissioner Flanagan said that with respect to Goal three (research studies) looking out beyond a single year to see what actionable goals can happen.



- The Executive Director said that these are goals that are not simple tasks but require a process of establishing measurements of success and priorities among the goal and will be reflected in the performance management goals cascading down throughout staff.
- Commissioner Flanagan asked whether there would be a formal assessment for the Executive Director before the finalization of these goals, to see whether some goals need to carry over.
- The Chairman indicated that a formal assessment of the Executive Director will happen prior to approving the prospective goals.

b. Amicus Brief Authorization – 6:33:22

- The Chair gave an overview of the topic and shared the General Counsel’s motion language.
- Commissioner Title shared her concerns with filing an amicus brief because of the Commissions’ requirement for an HCA, but not the ability to approve an HCA. Commissioner Title believes HCAs are the ultimate barrier to entry. The Commission is required to follow that process under statute, and the Commission has requested that the legislature authorize the Commission to approve HCAs. Because of this, Commissioner Title is concerned with advancing this process in a court.
- The Chairman noted that he does not foresee the brief advocating for a given position, but to characterize the law and process as it is.
- General Counsel Baily noted that the amicus brief filled by the Commission would not advocate for any one party but may indicate how a court decision might impact the Commission’s licensing process.
- Commissioner McBride asked the General Counsel to read the question certified by the Supreme Judicial Court.
  - General Counsel Baily read the question into the record.
  - Commissioner McBride noted that this is a question of the Commission’s process and that she believes that it would be a missed opportunity not to weigh in and inform the court, at its request, on the Commission’s process.
- Commissioner Title asked whether the Commission was asked to issue the brief.
  - General Counsel Baily said that it is an amicus announcement was made to the general public, but it touches on the Commission’s process and Court is extremely interested.
- Commissioner Flanagan moved to approve the Commission’s participation as an amicus curiae in the matter of SJC-13010, Mederi, Inc. v. City of Salem & others, to delegated to the Executive Director and his delegee, the General Counsel, the authority to draft and file the brief and if necessary, to appear for oral argument, and to coordinate as necessary with the Office of the Attorney General and State Solicitor.
- Commissioner McBride seconded the motion.
- The Commission voted to approve the motion by a vote of three in favor (Flanagan, Hoffman, McBride) and one against (Title).

c. Policy Discussion: Proposed Delivery Regulations – 6:46:25





- The Chairman gave an overview of the topic.
- Commissioner McBride had two primary suggestions.
  - Decouple the delivery license cap from the retail cap.
    - Allow up to three 3 retail licenses and up to 3 delivery licenses.
    - The difference between the retail license and the delivery license. Given the statutory caps in the statute, and these modifications would align delivery with that statutory limit and the practice.
    - Commissioner Title asked about setting a lower limit based than the number of retail licenses that can held.
    - Commissioner McBride said that based on the statutory language and the clear distinction between the two license types, it makes sense to clarify that.
    - General Counsel confirmed she would provide a legal opinion on this topic before the next meeting.
    - The Chairman reviewed the need for a policy decision and discussion at the meeting on November 30.
    - Commissioner McBride noted that she had requested a legal opinion.
    - Commissioner McBride moved to decouple the retail license cap from the delivery license cap in the delivery regulations.
    - Commissioner Title seconded the motion.
    - The Commission voted to approve the motion by a vote of three in favor (Flanagan, Hoffman, McBride) and one abstention (Title).
  - Prevent monopolization by creating guardrails around the relationships between third-party platforms and delivery licensees.
    - Make it explicit that tech platforms can contract with an unlimited number of delivery licensees, whether operators or curriers.
    - Limit investment of any amount by third-party platforms in delivery operators.
    - Borrow ABCC language stating that no licensee shall give or permit to be given anything of value to any person to persuade to purchase or contract or refrain from purchasing or contracting.
    - Making explicit that monopolization and attempt of monopolization, by borrowing antitrust language from G.L. c. 93.
    - Add new violation/enforcement language.
    - Avoid pay to play, make it consumer-driven.
    - Prior to final license, submit their contracts with tech platforms to the Commission.
    - Allow for banner advertising, but not allow for better placement on the website of products and include a disclosure that the advertising is paid.
    - Commissioner McBride noted that a lot of these ideas are borrowed from other legal standards with slight modification.
    - Commissioner Title suggested leaving some flexibility within the regulations to allow the Commission to draft address emerging considerations as the arise.





- The Commission discussed how best to approach the drafting, review, and approval of these provisions, ultimately deciding to draft provisions and vote on them at the November 30, 2021.

13) New Business the Chair Did Not Anticipate at the Time of Posting – There were no last-minute items.

14) Next Meeting Date – 7:12:00

- The Chairman noted that the next meeting will be on November 30, 2020 to vote on final regulations.

15) Adjournment – 7:12:22

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



---

## Memorandum

---

**To:** Chairman Hoffman and Commissioners Flanagan, Camargo, Stebbins & Concepcion  
**Cc:** Shawn Collins, Executive Director  
**From:** Christine Baily, General Counsel  
**Date:** April 9, 2021  
**Subject:** Legal Implications for Marijuana Establishments Posed by the Amendment to G. L. c. 94G, § 12 (f), a.k.a, the Survive and Thrive Amendment  
– FOR INFORMATION

**Importance Level: Routine**

---

### Introduction.

This memo provides an initial evaluation of the legal implications of the amendment to G. L. c. 94G, § 12 (f), which provides that Marijuana Establishments (ME) may purchase hemp or hemp products, including hemp-derived CBD, cultivated or manufactured by licensees of the Massachusetts Department of Agriculture (MDAR). In addition to describing the legal landscape, this memorandum explores two options available to the Commission's adult-use licensees. First, the Legislature established an option for Marijuana Retailers to purchase consumer-ready processed hemp products from MDAR Manufacturers, however, there are a limited number of products that federal regulators and MDAR approve for retail sale. Second, although this legislative amendment allows MEs to use cultivated or processed hemp, the Commission's licensees that process hemp, including incorporating hemp into a marijuana product, may be subject to MDAR's statutory licensing requirements<sup>1</sup> to the extent that they are processing a regulated substance. The scope of this memorandum is limited however, acknowledging that where other state agencies share jurisdiction over this subject matter, it would be premature to opine on issues implicating compliance with federal and state hemp laws

---

<sup>1</sup> Although G. L. c. 128, § 118 (a), provides that "[n]o person, other than a person utilizing hemp for commercial purposes pursuant to subsection (c) or a person utilizing industrial hemp for research pursuant to subsection (d), shall . . . sell industrial hemp without a license issued by [Massachusetts Department of Agriculture (MDAR)]," MDAR has indicated that it is not licensing individuals and entities seeking to sell hemp and hemp products to consumers.



without coordinating fully with these agencies and leveraging their expertise and relationships, especially with their federal counterparts.<sup>2</sup>

### The Amendment.

As recently amended, G. L. c. 94G allows MEs<sup>3</sup> to purchase hemp or hemp products from MDAR's licensees so long as these products comply with state and federal laws:

“No marijuana establishment shall cultivate, manufacture, sell or otherwise transact business with any products containing cannabinoids other than those that were produced, distributed and taxed in compliance with this chapter or any hemp and hemp products cultivated and manufactured in compliance with a license from the department of agricultural resources pursuant to chapter 128 and is in compliance with regulations set forth by the United States Department of Agriculture.”

G. L. c. 94G, § 12 (f). Although this legislative amendment made it an option for our licensees to acquire hemp or hemp products, there is no mandate. *Id.* In addition, the Legislature did not integrate hemp into the section establishing the Commission's legislative mandates to regulate adult-use marijuana and marijuana products. Cf. G. L. c. 94G, § 4.

### Federal laws and guidance.

The Commission should not allow for the cultivation, processing or sale of products that incorporate hemp or hemp products in a manner that will run afoul of federal and state law. As one of the federal agencies with jurisdiction over hemp products, the United States Food & Drug Administration (FDA) has reserved the right to take enforcement action with or without the cooperation of its state counterparts. While the FDA is primarily concerned with interstate commerce, a product may be subject to its jurisdiction if an ingredient was acquired via interstate commerce.<sup>4</sup> Thus, there is a need to clarify whether certain food and beverages, drugs, and

---

<sup>2</sup> With the passing of the 2018 Farm Bill, a.k.a. the Agricultural Improvement Act, , a.k.a, the Farm Bill, hemp is now considered an agricultural commodity and the cultivation of hemp is under the jurisdiction of the United States Department of Agriculture (USDA) on the federal level. The USDA Final Interim Rule on Hemp Production applies only to the production or cultivation of hemp plants for market. <https://www.ams.usda.gov/rules-regulations/hemp>. Under the Farm Bill, the United States Drug Enforcement Agency (DEA) has decontrolled hemp, hemp extracts and FDA-approved products containing CBD. On the state level, the MDAR has exclusive authority over the cultivation and processing of hemp.

<sup>3</sup> Although sections of G. L. c. 94G apply to the medical use of marijuana, the amendment is limited to adult use. G. L. c. 94G, § 12 (f).

<sup>4</sup> A number of federal agencies have retained jurisdiction over hemp, including the United States Food & Drug Administration (FDA). While the FDA is primarily concerned about interstate commerce, it acknowledges that “most” cosmetic products will be subject to its jurisdiction:

“What the FD&C Act Means by ‘Interstate Commerce’

“Section 201(b) of the FD&C Act [21 U.S.C. 321(b)] tells what circumstances place a product in interstate commerce:

“(1) commerce between any State or Territory and any place outside thereof, and  
(2) commerce within the District of Columbia or within any other Territory not organized with a legislative body.”

cosmetic products produced by our licensees would be subject to the agency's scrutiny. An FDA investigator looking at a Marijuana Product Manufacturer's processing of products that contain marijuana and hemp and that are not approved by the FDA may not limit their enforcement to hemp, but also seek to enforce federal laws regarding marijuana.<sup>5,6</sup> To address these concerns, we should consider options for leveraging expertise and relationships with federal regulators to determine the applicability of these FDA requirements and the likelihood and scope of their enforcement activity.

#### MDAR's Exclusive Authority Over Licensing the Production and Processing of Hemp.

The Legislature delegated to MDAR the authority to license individuals and entities seeking to cultivate and process industrial hemp for commercial purposes. Under Section 117:

*"[a] person planting, growing, harvesting, possessing, processing or selling industrial hemp for commercial purposes shall: (i) be licensed by the department pursuant to section 118."*

G. L. c. 128, § 117 (b) (emphasis added). Section 118 provides, in part:

*"No person, other than a person utilizing hemp for commercial purposes pursuant to subsection (c) or a person utilizing industrial hemp for research pursuant to subsection (d), shall plant, grow, harvest, possess, process or sell industrial hemp without a license issued by the department.*

*[...]*

*"(c) A person utilizing hemp for commercial purposes shall register with the department."*

Id. at § 118 (a) (emphasis added). In addition, MDAR has explicitly retained jurisdiction in its policy materials by stating: "All proposed commercial activities related to the processing of

---

"'Interstate commerce' applies to all steps in a product's manufacture, packaging, and distribution. It is very rare that a cosmetic product on the market is not in 'interstate commerce' under the law. For example, at least some of your ingredients or packaging most likely originate from out of state, or even out of the country. Likewise, it is foreseeable that your products will leave the state. Although there are certain exemptions [21 CFR 701.9], factors such as these generally cause the requirements of the FD&C Act to apply to your products."

[https://www.fda.gov/cosmetics/cosmetics-laws-regulations/key-legal-concepts-cosmetics-industry-interstate-commerce-adulterated-and-misbranded#Interstate Commerce](https://www.fda.gov/cosmetics/cosmetics-laws-regulations/key-legal-concepts-cosmetics-industry-interstate-commerce-adulterated-and-misbranded#Interstate%20Commerce).

<sup>5</sup> The FDA has observed that marijuana is still regulated by the DEA as a Schedule 1 drug under the Controlled Substances Act, 21 U.S.C. 802(16). See Question 1 at <https://www.fda.gov/news-events/public-health-focus/fda-regulation-cannabis-and-cannabis-derived-products-including-cannabidiol-cbd>.

<sup>6</sup> The Commission may also need to consider the concerns raised by federal law enforcement in the now rescinded Cole Memorandum, dated August 19, 2013. In this memo, federal law enforcement considered the states' efforts to legalize marijuana and suggested guidelines for when they would consider enforcing federal prohibitions. They recognized a concern with legalized marijuana activity being used as a pretext for other illegal activity or in a manner that placed the public at risk. <https://www.justice.gov/iso/opa/resources/3052013829132756857467.pdf>. To the extent that United States Attorney General Merrick Garland has signaled his intent to reinstate the memorandum, the guidelines set forth in the memo may become relevant again.

Hemp require licensing in accordance with this Policy in order to be considered in compliance with M.G.L. c. 128, Sections 116 through 123”; and “Licenses are required for Processors prior to engaging in any activity authorized by M.G.L. c. 128, Sections 118 through 123 or this Policy.”<sup>7</sup>

While the Legislative amendment allows for an exception to use cultivated or processed hemp, the Commission’s licensees that process hemp, including incorporating hemp into a marijuana product, may be subject to MDAR’s statutory licensing requirements to the extent that they are processing a regulated substance. In addition, the Commission should consider the implications of endorsing its licensees and agents to engage in unlicensed activity. MDAR as the agency charged with jurisdiction over this area should clarify whether it can cede its exclusive jurisdiction to allow our licensees to process hemp in compliance with state laws or recognize an exception to the existing licensing requirements.

#### Sale of MDAR’s Consumer-Ready Products by MEs.

It seems likely that the Commission can authorize its Marijuana Retailers to purchase consumer-ready processed hemp products from MDAR Manufacturers, while acknowledging that MDAR would need to put requirements in place to protect consumers and the public for risks potentially posed by their licensees’ products. A Marijuana Retailer will not need to be licensed by federal or state regulators to sell processed hemp products. In accordance with federal rules, MDAR established an Industrial Hemp Program, which does not license retail activity to consumers.<sup>8</sup> Similarly, federal regulators do not regulate this licensing activity; although they reserve the right to take enforcement action with or without the cooperation of state regulators.<sup>9</sup> Thus, so long as our licensees comply with the Commission’s and municipality’s requirements, and with the applicable federal rules, they can purchase these consumer-ready products from MDAR Manufacturers and sell them directly to consumers<sup>10</sup> who are 21 years of age or older.<sup>11</sup>

That said, based on this initial review, federal regulators and MDAR only allow for the sale of a limited number of products and MDAR does not recognize an exception in at least one

---

<sup>7</sup> See <https://www.mass.gov/doc/mdar-policy-statement-sale-of-hemp-derived-products/download>; <https://www.mass.gov/doc/2020-hemp-processor-policy/download>.

<sup>8</sup> MDAR’s authority is established in G. L. c. 128, §§ 116 to 128, which includes “[the] responsibility to regulate all activities related to hemp and industrial hemp within the Commonwealth.” <https://www.mass.gov/doc/mdar-policy-statement-sale-of-hemp-derived-products/download>. The Legislature has directed MDAR “to administer a licensing and registration program for the cultivation, processing, and sale of hemp and industrial hemp[. . . including] general oversight responsibility for approving the sale of hemp-derived products for commercial purposes.” *Id.* MDAR’s regulation of hemp-derived products supplements FDA rules and directives. *Id.*

<sup>9</sup> See Question No. 14 at <https://www.fda.gov/news-events/public-health-focus/fda-regulation-cannabis-and-cannabis-derived-products-including-cannabidiol-cbd>.

<sup>10</sup> See <https://www.mass.gov/doc/mdar-policy-statement-sale-of-hemp-derived-products/download>.

<sup>11</sup> Although there are no external market age-restriction on hemp sales, given the restriction that you must be 21+ to access a Marijuana Retailer, retail sales of hemp-derived products would be age limited.

instance. In general, consumers will not be able to access any consumable products that create a risk of ingesting THC or CBD. The list of **permissible products** include:

- If purchased from MDAR Manufacturers, not Extractors, these products will be consumer ready.
  - Hemp seed (Per the FDA, can be added to food, so long as it is manufactured in a way that is consistent with its specifications.)<sup>12</sup>
  - Hemp seed oil (same)
  - Hulled hemp seeds (same)
  - Hemp seed powder
  - Hemp protein (same)
- In compliance with FDA rules, cosmetic products containing hemp or CBD.<sup>13</sup>

---

<sup>12</sup> According to the FDA:

“Hemp seeds are the seeds of the *Cannabis sativa* plant. The seeds of the plant do not naturally contain THC or CBD. The hemp seed-derived ingredients that are the subject of these GRAS notices contain only trace amounts of THC and CBD, which the seeds may pick up during harvesting and processing when they are in contact with other parts of the plant. Consumption of these hemp seed-derived ingredients is not capable of making consumers ‘high.’

“[C]ertain hemp seed ingredients can be legally marketed in human food. However, all food ingredients must comply with all applicable laws and regulations. For example, by statute, any substance intentionally added to food is a food additive, and therefore subject to premarket review and approval by FDA, unless the substance is generally recognized as safe (GRAS) by qualified experts under the conditions of its intended use, or the use of the substance is otherwise excepted from the definition of a food additive (sections 201(s) and 409 of the FD&C Act [21 U.S.C. §§ 321(s) and 348]). Aside from the three hemp seed ingredients mentioned in Question #12, no other cannabis or cannabis-derived ingredients have been the subject of a food additive petition, an evaluated GRAS notification, or have otherwise been approved for use in food by FDA. Food companies that wish to use cannabis or cannabis-derived ingredients in their foods are subject to the relevant laws and regulations that govern all food products, including those that relate to the food additive and GRAS processes.”

See Question Nos. 10 and 12 at <https://www.fda.gov/news-events/public-health-focus/fda-regulation-cannabis-and-cannabis-derived-products-including-cannabidiol-cbd>.

<sup>13</sup> As the DPH clarifies in its guidance document, the FDA, not DPH, regulates and enforces the rules relating to selling cosmetic products containing hemp or CBD. <https://www.mass.gov/info-details/cbd-in-food-manufactured-or-sold-in-massachusetts>. [According to the FDA, it will enforce the following limits on cosmetic products:](#)

“A cosmetic is defined in 201(i) as “(1) articles intended to be rubbed, poured, sprinkled, or sprayed on, introduced into, or otherwise applied to the human body or any part thereof for cleansing, beautifying, promoting attractiveness, or altering the appearance, and (2) articles intended for use as a component of any such articles; except that such term shall not include soap.

“Under the FD&C Act, cosmetic products and ingredients are not subject to premarket approval by FDA, except for most color additives. Certain cosmetic ingredients are prohibited or restricted by regulation, but currently that is not the case for any cannabis or cannabis-derived ingredients. Ingredients not specifically addressed by regulation must nonetheless comply with all applicable requirements, and no ingredient – including a cannabis or cannabis-derived ingredient – can be used in a cosmetic if it causes the product to be adulterated or misbranded in any way. A cosmetic generally is adulterated if it bears or contains any poisonous or deleterious substance which may render it injurious to users under the conditions of use

- Clothing
- Building material
- Items made from hemp fiber
- Flower/plant; although if purchased from MDAR Growers or Producers, it will not be consumer ready<sup>14</sup>

The list of **prohibited products** include:

- Per the FDA and given MDAR’s decision not to recognize an exception, any food product containing CBD<sup>15</sup>
- Per the FDA, any product containing CBD derived from hemp that is a drug or makes therapeutic/medicinal claims<sup>16</sup>
- Per the FDA, any product that contains hemp in a dietary supplement<sup>17</sup>
- Animal feed that contains any hemp products<sup>18</sup>
- Per MDAR rule, unprocessed or raw plant material, including the flower meant for end use by a consumer<sup>19</sup>
- Per FDA, any product that was obtained through interstate commerce that contains CBD or that is adulterated, misbranded, or prohibited under the FD&C Act, 21 U.S.C. § 381(a)(3).<sup>20</sup>

---

prescribed in the labeling, or under such conditions of use as are customary or usual (section 601(a) of the FD&C Act [21 U.S.C. § 361(a)]).

“If a product is intended to affect the structure or function of the body, or to diagnose, cure, mitigate, treat or prevent disease, it is a drug, or possibly both a cosmetic and a drug, even if it affects the appearance. (See Question #3 for more information about drugs.)”

See Question No. 13 at <https://www.fda.gov/news-events/public-health-focus/fda-regulation-cannabis-and-cannabis-derived-products-including-cannabidiol-cbd>.

<sup>14</sup> See <https://www.mass.gov/doc/mdar-policy-statement-sale-of-hemp-derived-products/download>.

<sup>15</sup> As DPH observes in its guidance document, MDAR does not recognize an exception to the federal exemption to allow the addition of CBD to manufactured or retail food. <https://www.mass.gov/doc/cbd-cannabidiol-in-food-manufactured-or-sold-in-massachusetts/download>.

<sup>16</sup> The FDA has stated that there are no other FDA-approved drug products other than Epidiolex. It has indicated that it may take enforcement action in the event that there is a sale of these types of products:

“The agency has and will continue to monitor the marketplace and take action as needed to protect the public health against companies illegally selling cannabis and cannabis-derived products that can put consumers at risk and that are being marketed for therapeutic uses for which they are not approved.”

Question No. 4 at <https://www.fda.gov/news-events/public-health-focus/fda-regulation-cannabis-and-cannabis-derived-products-including-cannabidiol-cbd>.

<sup>17</sup> *Id.* at Question No. 9.

<sup>18</sup> See

<https://www.aafco.org/Portals/0/SiteContent/Announcements/Guidelines on Hemp in Animal Food May 1 2019.pdf>.

<sup>19</sup> See <https://www.mass.gov/doc/mdar-policy-statement-sale-of-hemp-derived-products/download>;  
<https://www.mass.gov/doc/mdar-policy-statement-sale-of-hemp-derived-products/download>.

<sup>20</sup> According to the FDA, some imports may be prohibited or violate federal law:

“Regarding imports, if it appears that an article is adulterated, misbranded, in violation of section 505 of the FD&C Act, or prohibited from introduction or delivery for introduction into interstate commerce under



Because restrictions that MDAR has currently put on its licensees, we are not clear how our retailers could obtain consumer-ready products from the following MDAR licensees:

MDAR Extractors. While MDAR Extractors are responsible for ensuring that the unfinished hemp it acquires to process meets MDAR testing certificate standards,<sup>21</sup> they are not subject to the same testing, packaging and labeling requirements.

MDAR Cultivators. MDAR Cultivators are not subject to the same testing requirements, and are restricted from packaging, labeling and making flower, whole plants, or leaves ready for sale to consumers.<sup>22</sup>

As noted above, the Commission will continue to work with MDAR to ensure that its licensees produce a product that protects the public. MDAR contemplates that its Manufacturers produce processed hemp products ready for consumers that may ultimately be used for human consumption and absorption.<sup>23</sup> MDAR Manufacturers are required to test in accordance with the Commission's standards (except for pesticides),<sup>24</sup> to maintain records,<sup>25</sup> and to label<sup>26</sup> processed

---

section 301(II) of the FD&C Act, such article will be refused admission (see section 801(a)(3) of the FD&C Act [21 U.S.C. § 381(a)(3)]).”

Question No. 15 at <https://www.fda.gov/news-events/public-health-focus/fda-regulation-cannabis-and-cannabis-derived-products-including-cannabidiol-cbd>.

<sup>21</sup> See <https://www.mass.gov/doc/2020-hemp-processor-policy/download>.

<sup>22</sup> MDAR Certification of Industrial Hemp through regulatory testing ensures THC levels < 0.3%. Certificates are issued by MDAR. See MDAR's "Interim Policy Commercial Industrial Hemp Program", Section II, Part B. "Inspections and Testing" at [https://www.mass.gov/doc/2018-ma-hemp-program-policy/download \(providing grower information in Section II. B.\)](https://www.mass.gov/doc/2018-ma-hemp-program-policy/download%20(providing%20grower%20information%20in%20Section%20II.%20B.)).

<sup>23</sup> See <https://www.mass.gov/doc/2020-hemp-processor-policy/download>.

<sup>24</sup> Under the 2020 Hemp Processor Policy, MDAR's licensees must comply with the following testing standards: "The Department is utilizing the same testing requirements as the Cannabis Control Commission ("CCC") for Hemp derived products. While the CCC does not have jurisdiction over Hemp and will have no role in the testing of Hemp or Hemp-derived products, Hemp Processors must have products tested according to the Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products. These testing protocols are available on the website at <https://www.mass.gov/info-details/medical-use-of-marijuana-programproduct-testing#cannabis-control-commission-testing-protocols>. If test results exceed the limits set forth in the Testing Protocols for heavy metal, microbiological contaminants, solvents (if used), and a cannabinoid profile then the Department must be notified. Failure to notify the Department may result in the loss of your license. Testing for pesticide residue is not required at this time."

Id. at page 9.

<sup>25</sup> Under the processor policy, MDAR Manufacturers must maintain the date of production; batch number (including lot number); amount produced; and name of product for all "end products" for at least three years. Id.

<sup>26</sup> Under the processor policy, MDAR Manufacturer's must ensure that products that will be used for human consumption and absorption are labeled in clear, legible wording no less than 1/16 inch in size on each container. Labels must be firmly affixed and include manufacturer name, license number and address; cannabinoid profile (THC and CBD concentrations, if applicable); batch number; and disclosure statement: "this product derived from Hemp has not been tested, analyzed, or approved by the Massachusetts Department of Agricultural Resources of the FDA." Id.



hemp products. It is important to emphasize, however, that in evaluating the public risks, MDAR and the Commission do not require testing for delta-8 THC despite the identified risks.<sup>27</sup> Moreover, there are no potency limits or dosing limitations regarding delta-8 THC.

To the extent that the product creates a risk to the public, the Commission risks claims that it exceeded its authority by responding to consumer questions regarding products produced and processed by MDAR's licensees. MDAR should exercise its authority and expertise over hemp, including addressing any risks posed by other unregulated, compounds with psychoactive effects or pesticides.<sup>28</sup> The label should provide sufficient information so that MDAR or the licensee could be contacted about these licensed activities. This approach considers the sale of these products akin to the sale of a Marijuana Accessory or Marijuana Establishment Branded Good that requires Marijuana Retailers to monitor its inventory and sales, but does not require tracking, given that the risk to the public will be addressed by the manufacturer of that product.<sup>29</sup> In addition, the FDA has established resources to receive constituent complaints and potentially take enforcement action.<sup>30</sup>

Finally, there is a question as to how sales of processed hemp will be taxed, and relatedly, a need for coordination with the Department of Revenue to determine how hemp sales are reported. Retail sales of non-marijuana products, such as accessories and branded goods are generally only subject to the state sales tax if they are separately stated on the receipt to the purchaser. Otherwise, the state excise tax and local option tax imposed by the host community of the Marijuana Retailer will apply to the entire transaction. Thus, sales of processed hemp products may be taxed under these circumstances.

### Additional Alternatives.

---

<sup>27</sup> To the extent that Delta-8 THC poses a risk to the public; see <https://www.nytimes.com/2021/02/27/health/marijuana-hemp-delta-8-thc.html?referringSource=articleShare>; the FDA did not identify it in its guidance, Question Nos. 1 and 2 at <https://www.fda.gov/news-events/press-announcements/statement-fda-commissioner-scott-gottlieb-md-signing-agriculture-improvement-act-and-agencys?source=techstories.org>; and our Legislature has not defined hemp or cannabis to include this substance.

<sup>28</sup> Under the 2020 Processor Policy, MDAR is not requiring pesticide testing. <https://www.mass.gov/doc/2020-hemp-processor-policy/download> (stating, under testing requirements that “[t]esting for pesticide residue is not required at this time”).

<sup>29</sup> Recording the inventory and sale of manufactured hemp items into the Commission's Seed-to-Sale SOR, which come already tested, packaged and labelled, may be an unnecessary step given MDAR's record keeping requirements, which are identified on page 8 at <https://www.mass.gov/doc/2020-hemp-processor-policy/download>.

<sup>30</sup> The FDA has constituent reporting mechanisms for the following:

- Consumers and healthcare providers can report adverse events associated with cannabis or cannabis-derived products via the FDA's MedWatch reporting system, either [online](#) or by phone at 1-800-FDA-1088. For more information, please see the [FDA's webpage on MedWatch](#).
- FDA can take action if it has information that an ingredient or cosmetic product is unsafe to consumers. Consumers can report adverse events associated with cosmetic products via the FDA's MedWatch reporting system, either online or by phone at 1-800-FDA-1088, or by contacting your nearest FDA district office consumer complaint coordinator. For more information, please see the FDA's webpage on how to [report a cosmetic-related complaint](#).

See Questions Nos. 7 and 13.



To move forward, it is recommended that staff continue to work with other state agencies to leverage their expertise and relationships, including with federal regulators, and to determine how our licensees could lawfully engage in licensed activity to process and sell hemp or hemp products. Clarification is needed for the following alternatives:

- Whether Marijuana Product Manufacturers can lawfully purchase hemp flower from MDAR Cultivators or Producers without being licensed.
- Whether Marijuana Product Manufacturers can lawfully purchase processed hemp from MDAR Processors and further process that hemp to produce hemp/marijuana products.
- Whether the FDA's jurisdiction over food and beverages would control under the Supremacy Clause, given our Legislature's decision to treat marijuana differently under G L. c. 94G, § 1.
- Whether Marijuana Retailers can purchase hemp flower, whole plants or leaves from MDAR Cultivators or Producers without being licensed, given MDAR's restrictions on their Cultivators or Producers creating consumer-ready products.
- Whether Marijuana Cultivators and Manufacturers can lawfully purchase flower from MDAR Cultivators or Producers without being licensed, and test and package and label the flower.

## BEACON COMPASSION, INC.

### **ESTABLISHMENT OVERVIEW**

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

Beacon Compassion, Inc.  
RMD Provisional License (Framingham)  
RMD Provisional License (New Bedford)  
MC281378 (Cultivation)  
MP281517 (Product Manufacturing)

### **BACKGROUND OVERVIEW**

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

Individual	Role
Chad W. Wise, D.D.S	Owner and Board Member
Benton B. Bodamer, Esq.	Owner and Board Member

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

Entity	Role
BCR Holdings, LLC	Owner

4. Background checks were conducted on all individuals and entities disclosed within the application, as applicable. No suitability issues were discovered.
5. The individuals and entity that are requesting ownership and control over the license(s) do not appear to have exceeded any ownership and control limits over any particular license type or cultivation canopy.
6. Commission staff conducted an organizational and financial inspection into the individuals and entity associated with this change of ownership and control request. Commission staff



found no issues or inconsistencies with the information provided to the Commission in the application.

### **RECOMMENDATION**

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

1. The licensee and the individuals/entity associated with this change in ownership and control may now effectuate any outstanding business agreements related to the change. The licensee will notify the Commission when the change in ownership and control has occurred.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations;
3. The licensee remains suitable for licensure;
4. The licensee shall cooperate with and provide information to Commission staff; and
5. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and/or 935 CMR 501.105(1) after effectuating the change in ownership and control, if applicable, and shall give Commission staff adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.



## COMMONWEALTH ALTERNATIVE CARE, INC.

### **ESTABLISHMENT OVERVIEW**

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

Commonwealth Alternative Care, Inc.  
MTC License (RMD785)  
MTC Provisional License  
MTC Provisional License

### **BACKGROUND OVERVIEW**

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

Individual	Role
Gary Santo, Jr.	Sole Director of Board of Directors

3. Background checks were conducted on the individual disclosed within the application, as applicable. No suitability issues were discovered.
4. The individual that is requesting ownership and control over the license(s) do not appear to have exceeded any ownership and control limits over any particular license type or cultivation canopy.

### **RECOMMENDATION**

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

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

COO Executive Summary 1



5. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 501.105(1) after effectuating the change in ownership and control, if applicable, and shall give Commission staff adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.



## COMMONWEALTH CULTIVATION, INC.

### **ESTABLISHMENT OVERVIEW**

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

Commonwealth Cultivation, Inc.  
MC281457 (Cultivation)

### **BACKGROUND OVERVIEW**

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

Individual	Role
Jason Kabbes	Managing Member of OBCC, LLC
Rashda Buttar	Owner of OBCC, LLC

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

Entity	Role
OBCC, LLC	Owner

4. Background checks were conducted on all individuals and entities disclosed within the application, as applicable. No suitability issues were discovered.
5. The individuals and entity that are requesting ownership and control over the license(s) do not appear to have exceeded any ownership and control limits over any particular license type or cultivation canopy.
6. Commission staff conducted an organizational and financial inspection into the individuals and entity associated with this change of ownership and control request. Commission staff found no issues or inconsistencies with the information provided to the Commission in the application.

### **RECOMMENDATION**

COO Executive Summary 1



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

1. The licensee and the individuals/entity associated with this change in ownership and control may now effectuate any outstanding business agreements related to the change. The licensee will notify the Commission when the change in ownership and control has occurred;
2. If following the effectuation of this change a change of business name is required, the licensee shall submit a change of name application for the license;
3. The licensee shall make any required changes in its pending product manufacturing license application;
4. The licensee is subject to inspection to ascertain compliance with Commission regulations;
5. The licensee remains suitable for licensure;
6. The licensee shall cooperate with and provide information to Commission staff; and
7. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and/or 935 CMR 501.105(1) after effectuating the change in ownership and control, if applicable, and shall give Commission staff adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.





## DEBILITATING MEDICAL CONDITION TREATMENT CENTERS, INC.

### **ESTABLISHMENT OVERVIEW**

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

Debilitating Medical Condition Treatment Centers, Inc.  
MTC Provisional License  
MC283056 (Cultivation)  
MR281621 (Retail)

### **BACKGROUND OVERVIEW**

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

Individual	Role
Jared Glanz-Berger	Owner, Board Member, Executive
David Goldblum	Owner, Board Member
Bradley Joseph	Owner, Board Member
Adam Firsel	Owner

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

Entity	Role
Core High Yield MA, LLC	Holding Company
MidCo CHY MA, LLC	Owner
JointCo LLC	Owner
JointCo JGB LLC	Owner
Core High Yield Investments, LLC	Owner
Shine Yingala Holdings LLC	Owner
22 Squared Holdings, LLC	Owner
JointCo Manager LLC	Manager
CHY Manager LLC	Owner



4. Background checks were conducted on all individuals and entities disclosed within the application, as applicable. No suitability issues were discovered.
5. The individuals and entities that are requesting ownership and control over the license(s) do not appear to have exceeded any ownership and control limits over any particular license type or cultivation canopy.
6. Commission staff conducted an organizational and financial inspection into the individuals and entities associated with this change of ownership and control request. Commission staff found no issues or inconsistencies with the information provided to the Commission in the application.

### **RECOMMENDATION**

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

1. The licensee and the individuals/entities associated with this change in ownership and control may now effectuate any outstanding business agreements related to the change. The licensee will notify the Commission when the change in ownership and control has occurred;
2. The licensee is subject to inspection to ascertain compliance with Commission regulations;
3. The licensee remains suitable for licensure;
4. The licensee shall cooperate with and provide information to Commission staff; and
5. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and/or 935 CMR 501.105(1) after effectuating the change in ownership and control, if applicable, and shall give Commission staff adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.



## HEAL, INC.

### **ESTABLISHMENT OVERVIEW**

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

Heal, Inc.  
MTC Provisional License (Sturbridge)  
MTC Provisional License (Provincetown)

### **BACKGROUND OVERVIEW**

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

Entity	Role
TAJ Green, LLC	Owner

3. Background checks were conducted on all individuals and entities disclosed within the application, as applicable. No suitability issues were discovered.
4. The entity that is requesting ownership and control over the license(s) do not appear to have exceeded any ownership and control limits over any particular license type or cultivation canopy.
5. Commission staff conducted an organizational and financial inspection into the entity associated with this change of ownership and control request. Commission staff found no issues or inconsistencies with the information provided to the Commission in the application.

### **RECOMMENDATION**

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

1. The licensee and proposed parties may now effectuate the approved license change.
2. The licensee shall notify the Commission when the change has occurred.
3. The licensee is subject to inspection to ascertain compliance with Commission regulations.

COO Executive Summary 1



4. The licensee shall remain suitable for licensure.
5. The licensee shall cooperate with and provide information to Commission staff.
6. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 501.105(1) after effectuating the change, if applicable, and shall give Commission staff adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.



## LIBERTY COMPASSION, INC.

### **ESTABLISHMENT OVERVIEW**

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

Liberty Compassion, Inc.  
MTC1586  
RMD1465  
MC282178 (Cultivation)  
MP281752 (Product Manufacturing)

### **BACKGROUND OVERVIEW**

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

Individual	Role
Benjamin Klover	President, CEO, Secretary and Director of Affinity; Manager of GTI Core, LLC; Manager of VCP23, LLC; Director of GTI23, Inc.; Chairman and CEO Green Thumb Industries Inc.
Anthony Georgiadis	CFO and Treasurer of Affinity; Manager of GTI Core, LLC; Manager of VCP23, LLC; Director of GTI23, Inc.; CFO and Director of Green Thumb Industries Inc.
Andrew Grossman	Manager of GTI Core, LLC; Manager of VCP23, LLC; Director of GTI23, Inc.
William Gruver	Director of Green Thumb Industries Inc.
Wendy Berger	Director of Green Thumb Industries Inc.
Glen Senk	Director of Green Thumb Industries Inc.
Westley Moore	Director of Green Thumb Industries Inc.

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

Entity	Role
GTI Core, LLC	Sole shareholder of Affinity



VCP23, Inc.	Sole member of GTI Core, LLC
GTI23, Inc.	Sole member of VCP23, LLC
Green Thumb Industries Inc.	Sole shareholder of GTI23, Inc.

4. Background checks were conducted on all individuals and entities disclosed within the application, as applicable. No suitability issues were discovered.
5. The individuals and entities that are requesting ownership and control over the license(s) do not appear to have exceeded any ownership and control limits over any particular license type or cultivation canopy.
6. Commission staff conducted an organizational and financial inspection into the individuals and entities associated with this change of ownership and control request. Commission staff found no issues or inconsistencies with the information provided to the Commission in the application.

### **RECOMMENDATION**

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

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



## NEW ENGLAND TREATMENT ACCESS, LLC

### **ESTABLISHMENT OVERVIEW**

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

New England Treatment Access, LLC  
RMD125  
RMD185  
RMD3028  
MC281267 (Cultivation)  
MP281240 (Product Manufacturing)  
MR281240 (Retail)  
MR281287 (Retail)  
MR283065 (Retail)

### **BACKGROUND OVERVIEW**

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

Entity	Role
Aegis MA LLC	Owner of Parent Company

3. Background checks were conducted on all individuals and entities disclosed within the application, as applicable. No suitability issues were discovered.
4. The entity that is requesting ownership and control over the license(s) do not appear to have exceeded any ownership and control limits over any particular license type or cultivation canopy.
5. Commission staff conducted an organizational and financial inspection into the entity associated with this change of ownership and control request. Commission staff found no issues or inconsistencies with the information provided to the Commission in the application.

### **RECOMMENDATION**



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

1. The licensee and the entity associated with this change in ownership and control may now effectuate any outstanding business agreements related to the change. The licensee will notify the Commission when the change in ownership and control has occurred.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
5. The licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) and/or 935 CMR 501.105(1) after effectuating the change in ownership and control, if applicable, and shall give Commission staff adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.





## MARIJUANA ESTABLISHMENT RENEWALS

### EXECUTIVE SUMMARY

COMMISSION MEETING: APRIL 16, 2021

#### **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
ARL HEALTHCARE INC.	MC281622	MCR139983	NEW BEDFORD	\$0.00
ARL HEALTHCARE INC.	MP281681	MPR243597	NEW BEDFORD	\$47,434.48
ARL HEALTHCARE INC.	MR282382	MRR205712	MIDDLEBOROUGH	\$47,434.48
BEACON COMPASSION, INC.	MC281378	MCR139982	ATTLEBORO	\$0.00
BEACON COMPASSION, INC.	MP281517	MPR243596	ATTLEBORO	\$0.00
BUD'S GOODS & PROVISIONS CORP.	MR281774	MRR205736	WATERTOWN	\$0.00
BUD'S GOODS & PROVISIONS CORP.	MR282319	MRR205723	WORCESTER	\$60,00.00
CANNA 11 HOLYOKE, LLC	MC281342	MCR139949	HOLYOKE	\$0.00
CAPE COD GROW LABS, LLC	MC281275	MCR139965	BREWSTER	\$0.00
CAPE COD GROW LABS, LLC	MP281446	MPR243584	BREWSTER	\$0.00
CTDW LLC	MR281844	MRR205713	SALEM	\$0.00
CULTIVATE LEICESTER, INC	MR281843	MRR205717	WORCESTER	\$0.00
EAGLE EYES TRANSPORT, INC	MT281320	MTR263099	PLYMOUTH	\$10,000.00
EOS-BITTERSWEET LLC	MC282296	MCR139987	PITTSFIELD	\$0.00
FERNWAY LLC	MP281661	MPR243600	NORTHAMPTON	\$0.00
GALIL GREENERY LLC	MR281978	MRR205699	NORTHAMPTON	\$0.00
GANESH WELLNESS INC.	MP281634	MPR243592	WEST BOYLSTON	\$64,097.46

ME Renewal Executive Summary 1



GANESH WELLNESS INC.	MR282519	MRR205710	WEST BOYLSTON	\$64,097.46
GARDEN WONDERS, INC	MR281970	MRR205707	MILLVILLE	\$60,000.00
GREEN MEADOWS FARM, LLC	MR282316	MRR205725	SOUHBRIDGE	\$3,898.38
GREEN STRATUS CORP	MR282256	MRR205722	BROCKTON	\$0.00
GROW TEAM GARDENS LLC	MB281521	MBR169271	LOWELL	\$0.00
HARVEST OF WORCESTER	MR281816	MRR205709	WORCESTER	\$60,000.00
HEAL PROVINCETOWN, INC	MR282621	MRR205719	PROVINCETOWN	\$0.00
HENNEP, INC.	MR281450	MRR205730	PROVINCETOWN	\$0.00
HIGH HAWK FARM LLC	MC282412	MCR139975	BARRE	\$0.00
HIGHMINDED LLC	MP281662	MPR243587	GREAT BARRINGTON	\$0.00
HIGHMINDED LLC	MR282318	MRR205703	GREAT BARRINGTON	\$0.00
HUDSON BOTANICAL PROCESSING, LLC	MP281588	MPR243588	HUDSON	\$217.56
HUMBOLDTEAST LLC	MC282004	MCR139977	GEORGETOWN	\$0.00
IN GOOD HEALTH INC.	MR282468	MRR205711	BROCKTON	\$393,069.47
MANTIS MANAGEMENT GROUP	MP281550	MPR243593	WINCHENDON	\$0.00
MUNRO ASSOCIATES LLC	MR282527	MRR205732	WORCESTER	\$60,000.00
MUNRO ASSOCIATES LLC	MR282604	MRR205733	LAKEVILLE	\$0.00
MUNRO ASSOCIATES LLC	MR282814	MRR205734	WEBSTER	\$0.00
NATIVE SUN MFG, LLC	MP281433	MPR243595	FITCHBURG	\$0.00
NATIVE SUN WELLNESS INC	MR281800	MRR205706	HUDSON	\$0.00
NATURE'S REMEDY OF MASSACHUSETTS, INC.	MR282049	MRR205718	WORCESTER	\$0.00
NORTHEMPTON ENTERPRISES, INC.	MR282356	MRR205702	NORTHAMPTON	\$0.00
NS AJO HOLDINGS INC.	MC281884	MCR139986	FITCHBURG	\$0.00
NS AJO HOLDINGS INC.	MP281564	MPR243599	FITCHBURG	\$0.00
NS AJO HOLDINGS INC.	MR282236	MRR205708	FITCHBURG	\$0.00
OCEAN BREEZE CULTIVATORS LLC	MC281908	MCR139984	GLOUCESTER	\$0.00
OCEAN BREEZE CULTIVATORS LLC	MP281663	MPR243598	GLOUCESTER	\$0.00
SILVER THERAPEUTICS, INC.	MR281910	MRR205705	ORANGE	\$32,901.00
SUNS MASS, INC.	MC281732	MCR139985	DEERFIELD	\$0.00
THE OLD BANK, LLC	MR282467	MRR205715	WELLFLEET	\$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.

The following licensees must comply with additional conditions:

1. ARL Healthcare Inc. (MC281622/ MP281681/ MR282382)
  - a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
  - b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
  - c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).
2. Beacon Compassion, Inc. (MC281378/ MP281517)
  - a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
  - b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
  - c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual,

ME Renewal Executive Summary 3



resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

- d. Within 60 days, or upon a post-provisional license inspection if this inspection has not yet taken place, the licensee shall submit documentation (energy compliance or exemption letter) regarding its requirement to comply with the Commission's energy regulations pursuant to 935 CMR 500.120(11).

3. Bud's Goods & Provisions Corp. (MR281774/ MR282319)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

4. Canna 11 Holyoke, LLC (MC281342)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).
- d. Within 60 days, or upon a post-provisional license inspection if this inspection has not yet taken place, the licensee shall submit documentation (energy compliance or exemption letter) regarding its requirement to comply with the Commission's energy regulations pursuant to 935 CMR 500.120(11).

5. Cape Cod Grow Lab, LLC (MC281275/ MP281446)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.



- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).
- d. Within 60 days, or upon a post-provisional license inspection if this inspection has not yet taken place, the licensee shall submit documentation (energy compliance or exemption letter) regarding its requirement to comply with the Commission's energy regulations pursuant to 935 CMR 500.120(11).

6. CTDW LLC (MR281844)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

7. Cultivate Leicester, Inc. (MR281843)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

8. Eagle Eyes Transport, Inc (MT281320)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.



- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

9. EOS-Bittersweet LLC (MC282296)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

10. Fernway LLC (MP281661)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

11. Galil Greenery LLC (MR281978)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).





resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

12. Ganesh Wellness Inc. (MP281634/MR282519)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

13. Garden Wonders, Inc (MR281970)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

14. Green Meadows Farm, LLC (MR282316)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).



15. Green Stratus Corp (MR282256)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

16. Grow Team Gardens LLC (MB281521)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

17. Harvest of Worcester (MR281816)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

18. Heal Provincetown, Inc (MR282621)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.





- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

19. Hennep, Inc (MR281450)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

20. High Hawk Farm LLC (MC282412)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).
- d. Within 60 days, or upon a post-provisional license inspection if this inspection has not yet taken place, the licensee shall submit documentation (energy compliance or exemption letter) regarding its requirement to comply with the Commission's energy regulations pursuant to 935 CMR 500.120(11).

21. Highminded LLC (MP281662/ MR282318)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.



- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

22. Hudson Botanical Processing, LLC (MP281588)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

23. Humboldt LLC (MC282004)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).
- d. Within 60 days, or upon a post-provisional license inspection if this inspection has not yet taken place, the licensee shall submit documentation (energy compliance or exemption letter) regarding its requirement to comply with the Commission's energy regulations pursuant to 935 CMR 500.120(11).

24. In Good Health Inc. (MR282468)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.



- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).
- d. Within 60 days, or upon a post-provisional license inspection if this inspection has not yet taken place, the licensee shall submit documentation (energy compliance or exemption letter) regarding its requirement to comply with the Commission's energy regulations pursuant to 935 CMR 500.120(11).

25. Mantis Management Group (MP281550)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

26. Munro Associates LLC (MR282527/ MR282604/ MR282814)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

27. Native Sun MFG, LLC (MP281433)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.



- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

28. Native Sun Wellness Inc (MR281800)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

29. Nature's Remedy of Massachusetts, Inc. (MR282049)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

30. Northampton Enterprises, Inc. (MR282356)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).



resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

31. NS AJO Holdings Inc. (MC281884/MP281564/MR282236)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).
- d. Within 60 days, or upon a post-provisional license inspection if this inspection has not yet taken place, the licensee shall submit documentation (energy compliance or exemption letter) regarding its requirement to comply with the Commission's energy regulations pursuant to 935 CMR 500.120(11).

32. Ocean Breeze Cultivators LLC (MC281908/ MP281663)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).
- d. Within 60 days, or upon a post-provisional license inspection if this inspection has not yet taken place, the licensee shall submit documentation (energy compliance or exemption letter) regarding its requirement to comply with the Commission's energy regulations pursuant to 935 CMR 500.120(11).

33. Silver Therapeutics, Inc. (MR281910)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.



- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).

34. Suns Mass, Inc. (MC281732)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).
- d. Within 60 days, or upon a post-provisional license inspection if this inspection has not yet taken place, the licensee shall submit documentation (energy compliance or exemption letter) regarding its requirement to comply with the Commission's energy regulations pursuant to 935 CMR 500.120(11).

35. The Old Bank, LLC (MR282467)

- a. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Plan to Positively Impact Disproportionately Harmed People.
- b. Within 90 days of the removal of the State of Emergency declaration, the licensee shall notify the Cannabis Control Commission of updated actions taken on their Diversity Plan.
- c. Within 90 days, the licensee shall submit documentation that it requested from its Host Community the records of any cost to the city or town, whether anticipated or actual, resulting from the licensee's operation within its borders. Additionally, the licensee shall submit any response received from the Host Community, and if no response received, an attestation to that effect. The licensee shall comply with this requirement as stated within 935 CMR 500.103(4)(f).





## MEDICAL MARIJUANA TREATMENT CENTER RENEWALS

### EXECUTIVE SUMMARY

COMMISSION MEETING: APRIL 16, 2021

#### **RENEWAL OVERVIEW**

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

Medical Marijuana Treatment Center Name	License Number	Location (Cultivation & Processing)	Location (Dispensing)
ALTERNATIVE COMPASSION SERVICES	RMD585	BRIDGEWATER	BRIDGEWATER
ATLANTIC MEDICINAL PARTNERS, INC.	RMD1506	FITCHBURG	FITCHBURG
BEACON COMPASSION CENTER, INC.	MTC	ATTLEBORO	NEW BEDFORD
BRIARLEAF, LLC	MTC	ATTLEBORO	ATTLEBORO
GREEN GOLD GROUP, INC.	RMD786	NORTH BROOKFIELD	CHARLTON
HOLISTIC INDUSTRIES	RMD1526	MONSON	EASTHAMPTON
MASS ALTERNATIVE CARE, INC.	RMD726	CHICOPEE	CHICOPEE
PHYTOTHERAPY, INC.	MTC	FITCHBURG	PEABODY
PLEASANTTREES, INC.	MTC	CHESTER	CHESTER
THEORY WELLNESS INC.	RMD305	BRIDGEWATER	BRIDGEWATER

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

#### **RECOMMENDATION**



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





## **BUD'S GOODS & PROVISIONS CORP.**

MR282410

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Bud's Goods & Provisions Corp.  
1540 Bedford Street, Abington, MA 02351

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 9/Outdoor (70,001 – 80,000 sq. ft.)	Provisional License	Halifax
Cultivation, Tier 3/Indoor (10,001 – 20,000 sq. ft.)	Provisional License	Lakeville
Product Manufacturing	Provisional License	Lakeville
Retail	Commence Operations	Worcester
Retail	Provisional License	Watertown

### **LICENSING OVERVIEW**

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

Final License Executive Summary 1



## **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): March 9, 2021.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Retail Operation

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

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

- d. Transportation



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

### **RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:

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

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

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



## **CANNATECH MEDICINALS, INC.**

MC282690

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Cannatech Medicinals, Inc.  
1100 Innovation Way, Fall River, MA 02722

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

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

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

Type	Status	Location
Product Manufacturing	Provisional License	Fall River
MTC	Provisional License	Fall River-Fall River

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on October 8, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**

Final License Executive Summary 1



8. Commission staff inspected the licensee's facility on the following date(s): February 5, 2021.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.

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

a. Security

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

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

b. Inventory and Storage

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

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

c. Cultivation Operation

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

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

d. Transportation

The licensee owns a vehicle and will request a vehicle inspection after final licensure.



## **RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:

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

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

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



## **CAREGIVER-PATIENT CONNECTION, LLC**

MC282206

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Caregiver-Patient Connection, LLC  
61C Tripp Street, Framingham, MA 01701

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

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

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

Type	Status	Location
Cultivation, Tier 2/Indoor (5,001 – 10,000 sq. ft.)	Commence Operations	Barre
Cultivation, Tier 2/ Outdoor (5,001 – 10,000 sq. ft.)	Commence Operations	Barre
Product Manufacturing	Provisional License	Framingham
Retail	Commence Operations	Sturbridge

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on January 9, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

Final License Executive Summary 1



## **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): March 8, 2021.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

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

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

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

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

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



## COASTAL CULTIVARS, LLC

MC282052

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

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

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

Cultivation, Tier 11/Outdoor (90,000 – 100,000 sq. ft.)

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

Type	Status	Location
Product Manufacturing	Application Submitted	Wareham
Retail	Application Submitted	Great Barrington

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on July 9, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): March 17, 2021.

Final License Executive Summary 1



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

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

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

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



## GREEN MEADOWS FARM, LLC

MC282409

MP281763

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Green Meadows Farm, LLC  
64 Mill Street, Southbridge, MA 01550

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

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

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

Type	Status	Location
Retail	Commence Operations	Southbridge
MTC	Provisional License	Southbridge - Southbridge

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on July 9, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**

Final License Executive Summary 1



8. Commission staff inspected the licensee's facility on the following date(s): February 5, 2021 and March 3, 2021.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

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

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

- d. Product Manufacturing Operation



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

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

e. Transportation

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 sell, or otherwise transport marijuana to other Marijuana Establishments, until upon inspection, receiving permission from the Commission to commence full operations;
2. The licensee is subject to inspection to ascertain compliance with Commission regulations;
3. The licensee remains suitable for licensure;
4. The licensee shall cooperate with and provide information to Commission staff; and
5. Licensure is subject to notification to the Commission of any update to written operations plans required by 935 CMR 500.105(1) prior to the issuance of a commencement of operations and that Commission staff be given adequate opportunity to review said plans at the business location or the location where any such plans are maintained in the normal course of business.

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

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



**GREEN STRATUS CORP.**  
MR282256

**ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Green Stratus Corp.  
d/b/a Cannapi  
255 N. Pearl Street, Brockton, MA 02301

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

Retail

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

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

**INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): February 18, 2021.





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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Retail Operation

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

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

- d. Transportation

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

## **RECOMMENDATION**



Commission staff recommend final licensure with the following conditions:

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

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

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



**GREEN WORLD, LLC**  
MR281939

**ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Green World, LLC  
d/b/a Green Heart  
897 North Montello Street, Brockton, MA 02301

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

Retail

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

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

**INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): February 17, 2021.



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Retail Operation

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

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

- d. Transportation

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

## **RECOMMENDATION**



Commission staff recommend final licensure with the following conditions:

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

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

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



## **HARMONY OF MA, INC.**

MR282668

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Harmony of MA, Inc.  
111 Shrewsbury Street, West Boylston, MA 01583

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

Retail

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

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

### **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): March 17, 2021.



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Retail Operation

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

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

- d. Transportation

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

## **RECOMMENDATION**



Commission staff recommend final licensure with the following conditions:

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

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

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





## **HEAL STURBRIDGE, INC.**

MR283323

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Heal Sturbridge, Inc.  
660 Main Street, Sturbridge, MA 01566

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

Retail

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

The licensee is not an applicant or licensee for any other license type. However, individuals and entities are licensees for two (2) Medical Marijuana Treatment Centers and an additional adult-use Cultivation, Product Manufacturing, and Retail under different variations of the business name.

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on September 10, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**



8. Commission staff inspected the licensee's facility on the following date(s): February 26, 2021.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

a. Security

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

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

b. Inventory and Storage

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

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

c. Retail Operation

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

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

d. Transportation

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



## **RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:

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

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

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



## **LIBERTY MARKET, LLC**

MR281804

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

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

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

Retail

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

The 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(s) on October 10, 2021.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): March 23, 2021.



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Retail Operation

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

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

- d. Transportation

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

## **RECOMMENDATION**



Commission staff recommend final licensure with the following conditions:

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

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

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



**MMM TRANSPORT, INC.**  
MT281556

**ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

MMM Transport, Inc.  
376 Easthampton Road, Northampton, MA 01060

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

Third-Party Transporter

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

**INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): February 23, 2021.



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Transportation

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

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

## **RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:





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

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

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



**THE HEADYCO, LLC**  
MC281292

**ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

The Headyco, LLC  
4 LaChance Street, Gardner, MA 01441

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

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

3. The licensee 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

**LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on January 16, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

**INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): March 5, 2021.

Final License Executive Summary 1



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

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

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

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



## **THE HEALING CENTER, LLC**

MR283193

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

The Healing Center, LLC  
346 River Street, Fitchburg, MA 01420

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

Retail

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

The 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(s) on September 10, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): February 17, 2021.



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Retail Operation

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

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

- d. Transportation

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

## **RECOMMENDATION**



Commission staff recommend final licensure with the following conditions:

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

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

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



**THE OLD BANK, LLC**  
MR282467

**ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

The Old Bank, LLC  
d/b/a The Piping Plover  
10 Main Street, Wellfleet, MA 02667

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

Retail

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

The 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(s) on April 9, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

**INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): March 3, 2021.





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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Retail Operation

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

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

- d. Transportation

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

## **RECOMMENDATION**



Commission staff recommend final licensure with the following conditions:

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

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

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



**VOLCANN, LLC**  
MR282925

**ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Volcann, LLC  
d/b/a Dreamer  
15 College Highway, Unit G2, Southampton, MA 01073

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

Retail

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

The 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(s) on July 9, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

**INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): February 24, 2021.



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Retail Operation

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

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

- d. Transportation

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

## **RECOMMENDATION**



Commission staff recommend final licensure with the following conditions:

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

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

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



## GREEN MEADOW FARM, LLC MTC1626

### **ESTABLISHMENT OVERVIEW**

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

Green Meadow Farm, LLC

Cultivation: 64 Mill Street, Southbridge, MA 01550

Product Manufacturing: 64 Mill Street, Southbridge, MA 01550

Dispensary: 64 Mill Street, Southbridge, MA 01550

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

Type	Status	Location
Cultivation, Tier 3/Indoor (10,001 – 20,000 sq. ft.)	Provisional License	Southbridge
Product Manufacturing	Final License	Southbridge
Retail	Commence Operations	Southbridge

### **LICENSING OVERVIEW**

3. The licensee was approved for provisional licensure on April 25, 2019.
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): February 5, 2021, March 3, 2021, and March 29, 2021.
8. The licensee's Medical Marijuana Treatment Center was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 501.000, as applicable.
9. No evidence was discovered during the inspection(s) that indicated the Medical Marijuana Treatment Center was not in compliance with all applicable state and local bylaws or ordinances.

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

a. Security

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

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

b. Inventory and Storage

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

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

c. Cultivation Operation

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

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

d. Product Manufacturing Operation



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.





**BOATHOUSE STORE, LLC**  
MRN283919

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Boathouse Store, LLC  
4 Town Forest Road, Webster, Massachusetts 01570

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

Retail

The application was reopened twice (2) for additional information.

3. The applicant is 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
Stephen Harrington	Manager
Terence Fracassa	Manager

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

Entity	Role
CanWell, LLC	Entity Providing Capital Resources

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on November 9, 2020.



8. The applicant conducted a community outreach meeting on October 15, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 1, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide a minimum of twelve (12) expungement filings per year for individuals who have prior possession charges.
2	Give hiring consideration to at least 50% of individuals or their spouses or the direct descendants of such individuals who have obtained expungement services (goal #1).

### **SUITABILITY REVIEW**

11. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

### **MANAGEMENT AND OPERATIONS REVIEW**

13. The applicant states that it can be operational within five (5) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:  
  
Monday – Sunday: 8:00 a.m. – 9:00 p.m
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Give hiring preference (50%) to minorities, women, veterans, people with disabilities and people identifying as LGBTQ+.



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

Boathouse Store, LLC will obtain marijuana or marijuana products by contracting with other licensed establishments.

**RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

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

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



**C3 BERLIN, LLC**  
MRN283625

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

C3 Berlin, LLC  
64 Banner Road, Berlin, Massachusetts 01503

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 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
Ankur Rungta	Executive/Officer
Vishal Rungta	Executive/Officer
Joel Ruggiero	Executive/Officer

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

Entity	Role
C3 Industries, LLC	Holding Company

6. Applicant's priority status:

General Applicant



7. The applicant and municipality executed a Host Community Agreement on August 31, 2020.
8. The applicant conducted a community outreach meeting on June 15, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the city/town of Berlin on January 8, 2021. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Contribute an annual donation of \$5,000.00 to Nueva Esperanza, Inc. an organization that serves an Area of Disproportionate Impact (Holyoke, MA).
2	Contribute an annual donation of \$5,000.00 as an educational grant to support individuals who are past or present residents of Mansfield, Holyoke and/or Boston. This grant is focused on individuals who are interested in continuing education and career development in the cannabis industry.

### **SUITABILITY REVIEW**

11. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

### **MANAGEMENT AND OPERATIONS REVIEW**

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

#	Goal
---	------



<b>1</b>	Give hiring preference (20%) to minorities and women.
----------	-------------------------------------------------------

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

C3 Berlin, LLC will obtain marijuana or marijuana products by contracting with other licensed establishments.

## **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

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

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



**COASTAL CULTIVARS, LLC**  
MRN282884

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Coastal Cultivars, LLC  
454 Main Street, Great Barrington, Massachusetts 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 three (3) times for additional information.

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

Type	Status	Location
Cultivation, Tier 11/Outdoor (90,001 – 100,000 sq. ft.)	Final License	Wareham
Product Manufacturing	Provisional License	Wareham

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

Individual	Role
Benjamin Smith	Owner/Partner
Jose Breton	Owner/Partner
Jarrad Glennon	Owner/Partner
Krishna Gandhi	Owner/Partner

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



Entity	Role
Samoel Ventures, LLC	Jarred Glennon – sole owner of entity.
Greenfin, LLC	Benjamin Smith – sole owner of entity.
Walnut 1 <sup>st</sup> Partners, LLC	Krishna Gandhi – sole owner of entity. Providing capital resources.

6. Applicant's priority status:

Expedited Applicant (Minority-Owned Business)

7. The applicant and municipality executed a Host Community Agreement on December 7, 2020.
8. The applicant conducted a community outreach meeting on September 17, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Great Barrington on January 14, 2021. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Give hiring preference (25%) to individuals from Pittsfield, individuals with past drug convictions and/or parents or spouses with drug convictions.
2	Source 25% of its vendors, contractors, builders and ancillary services from Pittsfield or West Springfield.

### **SUITABILITY REVIEW**

11. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

### **MANAGEMENT AND OPERATIONS REVIEW**

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





Monday – Sunday: 8:00 a.m. – 9:30 p.m.

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

#	Goal
1	Give hiring preference (35%) to minorities, women, veterans, people with disabilities and people identifying as LGBTQ+.

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

Coastal Cultivars, LLC will obtain marijuana or marijuana products by contracting with other licensed establishments.

### **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

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

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



## DEBILITATING MEDICAL CONDITION TREATMENT CENTERS

MCN283056

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

1. Name and address of the proposed Marijuana Establishment:

Debilitating Medical Condition Treatment Centers  
7 River Road, Whately, Massachusetts 01093

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

Cultivation, Tier 10/Outdoor (80,001 – 90,000 sq. ft.)

The application was reopened twice (2) for additional information.

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

Type	Status	Location
MTC	Provisional License	Agawam - Agawam
Cultivation	Application Submitted	Whately
Product Manufacturing	Application Submitted	Agawam

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

Individual	Role
Grant Guelich	Owner/Partner
David Goldblum	Owner/Partner
Bradley Joseph	Owner/Partner
Adam Firsell	Owner/Partner
Samuel Hanmer	Owner/Partner
Jared Glanz-Berger	Owner/Partner



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

Entity	Role
Englewood Managements, LLC	Management Company
Jin Yang MA, LLC	Management Company
Core High Yield MA, LLC	Management Company
MidCO CHY MA, LLC	Management Company
JointCo, LLC	Management Company
JointCo JGB, LLC	Management Company
Core High Yield Investments, LLC	Management Company
Shine Yingala Holdings, LLC	Management Company
22 Sqaured Holdings, LLC	Management Company

6. Applicant's priority status:

Expedited Applicant (License Type)

7. The applicant and municipality executed a Host Community Agreement on July 15, 2020.
8. The applicant conducted a community outreach meeting on June 15, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 12, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Give hiring preference (25%) to past or present residents of an Area of Disproportionate Impact, specifically focused on Greenfield.

### **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 eight (8) months of receiving the provisional license(s).



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	Give hiring preference to minorities (35%), women (35%), veterans (35%) and people with disabilities (35%).

17. Summary of cultivation plan (if applicable):

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

## **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

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

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



**DISCERN'D CANNABIS PURVEYORS, INC.**  
MRN283997

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Discern'd Cannabis Purveyors, Inc.  
130 Worcester Street, Grafton, Massachusetts 01519

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

Retail

The application was reopened once (1) for additional information.

3. The applicant is 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
Allan Villatoro	Executive/Officer
Bruce Spinney	Director

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

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

6. Applicant's priority status:

Expedited Applicant (Minority-Owned Business)

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



8. The applicant conducted a community outreach meeting on December 28, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 3, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Contribute an annual donation of \$2,500.00 to New England Veterans Alliance (“NEVA”).
2	Contribute \$3,000.00 per calendar year to Cannabis Expungement Program (“CEP”) to provide financial assistance for legal/filing fees for up to five (5) individuals from an ADI attempting to expunge cannabis related charges from their record.

### **SUITABILITY REVIEW**

11. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

### **MANAGEMENT AND OPERATIONS REVIEW**

13. The applicant states that it can be operational within five (5) months of receiving the provisional license(s).
14. The applicant’s proposed hours of operation are the following:  
  
Monday – Sunday: 10:00 a.m. – 8:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission’s regulations.
16. The applicant proposed the following goals for its Diversity Plan:

#	Goal
1	Give hiring preference (35%) to minorities.



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

Discern'd Cannabis Purveyors, Inc. will obtain marijuana or marijuana products by contracting with other licensed establishments.

**RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

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

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



**EAST BOSTON BLOOM, LLC**  
MRN283011

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

East Boston Bloom, LLC  
69-71 Maverick Square, Boston, Massachusetts 02128

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

Retail

The application was reopened three (3) times for additional information.

3. The applicant is 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
Julius Sokol	Owner/Partner
Nicholas Spagnola	Owner/Partner
Luis Vasco	Owner/Partner
Steven Vasco	Owner/Partner

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

Entity	Role
Bloom Market Garden, Inc.	Holding Company
Maverick Dispensary	Holding Company

6. Applicant's priority status:





Expedited Applicant (Minority- and Veteran-Owned Business)

7. The applicant and municipality executed a Host Community Agreement on February 11, 2019.
8. The applicant conducted a community outreach meeting on January 27, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Boston on January 14, 2021. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Contribute an annual donation of at least \$5,000.00 to the CultivatED Program.
2	Contribute employee volunteer time with a goal of donating eight (8) hours per employee, per year. East Boston Bloom seeks 85% participation in the neighborhood clean-up program by its employees each calendar year.

**SUITABILITY REVIEW**

11. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

**MANAGEMENT AND OPERATIONS REVIEW**

13. The applicant states that it can be operational within six (6) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:  
  
Monday – Saturday: 9:00 a.m. – 7:00 p.m.  
Sunday: 11:00 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	Comprise a workforce of at least 50% women and 25% minorities, veterans, people with disabilities and people identifying as LGBTQ+.
2	Ensure all participants in the establishment's supply chain and ancillary services are owned and/or managed by minorities, women, veterans, people with disabilities and people identifying as LGBTQ+.

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

East Boston Bloom, LLC will obtain marijuana or marijuana products by contracting with other licensed establishments.

### **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

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

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



**FCC HOLDINGS, LLC**  
MBN282029

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

FCC Holdings, LLC  
d/b/a Florence Cannabis Company  
131 Texas Road, Northampton, Massachusetts 01060

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

Microbusiness (Cultivation)

The application was reopened twice (2) for additional information.

3. 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
Chris Rivers	Owner/Partner

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

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

6. Applicant's priority status:

Expedited Applicant (License Type)

7. The applicant and municipality executed a Host Community Agreement on December 15, 2020.



8. The applicant conducted a community outreach meeting on November 10, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on February 22, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Comprise a staff and management team of at least 25% being residents of an area of disproportionate Impact and individuals with 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 two (2) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:  
  
Monday – Friday: 8:00 a.m. – 5:30 p.m.  
Saturday – Sunday: 8:00 a.m. – 3:00 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	Comprise a staff of 25% minorities, women, veterans, people with disabilities and people identifying as LGBTQ+.
2	Hold annual diversity trainings for all employees. FCC Holdings seeks a 100% participation rate from all employees to participate in this program.



17. Summary of cultivation plan (if applicable):

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

**RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws 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.



## FLOWER POWER GROWERS, INC.

MCN283122

MPN281983

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

1. Name and address of the proposed Marijuana Establishment:

Flower Power Growers, Inc.  
180 Industrial Blvd., Montague, Massachusetts 01376

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

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

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

3. The applicant is not an applicant or licensee for any other license type.
4. List of all required individuals and their business roles in the Marijuana Establishment:

Individual	Role
John Stobierski	Owner/Partner
Michael Cohen	Owner/Partner
Josh Goldman	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 11, 2020.
8. The applicant conducted a community outreach meeting on November 24, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on February 23, 2021 (both cultivation and product manufacturing) stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	To provide a number of Franklin County residents with legal assistance, support, and legal representation if necessary, to either seal or expunge marijuana possession court records. Flower Power Growers seek to have at least seven (7) participants.
2	Provide effected people with advice in the form of in-person or electronic consultations at the Franklin County Bar Association at least twice a month.

### **SUITABILITY REVIEW**

11. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

### **MANAGEMENT AND OPERATIONS REVIEW**

13. The applicant states that it can be operational within three (3) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:  
  
Monday – Sunday: 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	Give hiring preference (50%) to minorities, women, veterans, people with disabilities and people identifying as LGBTQ+.

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Edibles (square shaped); fruit puree combined with extracted cannabis oil, dried, and crisped. Flavors available: mango, strawberry, and raspberry.

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

Flower Power Growers, Inc. plans to obtain marijuana from its affiliated licenses. If the need arises, Flower Power Growers, Inc. will obtain marijuana or marijuana products by contracting with other licensed establishments.

## **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

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

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





## HOME GROWN 617, LLC

MRN281626

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

1. Name and address of the proposed Marijuana Establishment:

Home Grown 617, LLC  
d/b/a Yamba  
580 Massachusetts Ave, Cambridge, Massachusetts 02139

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

Retail

The application was reopened twice (2) for additional information.

3. The applicant is 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
Sieh Samura	Owner/Partner
Sean Hope	Owner/Partner
Binoj Pradhan	Board Member
Scott Zink	Board Member

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

Entity	Role
Home Grown 617, LLC	Parent Company

6. Applicant's priority status:

Priority Review (Economic Empowerment Priority Applicant)  
(Sieh Samura—51% ownership— EE201972)



7. The applicant and municipality executed a Host Community Agreement on October 2, 2020.
8. The applicant conducted a community outreach meeting on August 13, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on February 11, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide mentorship and funding programs, hiring plans, and direct peer support for: Commission-designated Certified Economic Empowerment Priority recipients; Commission-designated Social Equity Program participants; Massachusetts residents who have past drug convictions; Massachusetts residents with parents or spouses who have drug convictions; and Past or present residents of and ADI. Home Grown seeks to assist at least 10-20 individuals falling into the above listed demographics.
2	Technical and Funding Assistance Program: identify one (1) Social Equity Participant and one (1) Economic Empowerment Applicant and provide \$5,000.00 per participant for funding assistance.
3	Give hiring preference (51%) to Past or present residents of communities designated by the Cannabis Control Commission as disproportionately impacted specifically the neighborhoods of Boston Roxbury, Dorchester, Mattapan, Jamaica Plain and Hyde Park. Commission-designated Certified Economic Empowerment Priority recipients; Commission-designated Social Equity Program participants; Massachusetts residents who have past drug convictions; and Massachusetts residents with parents or spouses who have drug convictions.

### **SUITABILITY REVIEW**

11. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

### **MANAGEMENT AND OPERATIONS REVIEW**

13. The applicant states that it can be operational within three (3) of receiving the provisional license(s).



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

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

Sunday: 10:00 a.m. – 8:00 p.m.

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

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

#	Goal
1	Give hiring preference to women (50%), minorities (50%), veterans (10%), people with disabilities (10%), and people identifying as LGBTQ+ (10%).

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

Home Grown 617, LLC will obtain marijuana or marijuana products by contracting with other licensed establishments.

## **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

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

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



## IDEAL CRAFT CANNABIS, INC.

MCN283286

MPN282007

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

1. Name and address of the proposed Marijuana Establishment:

Ideal Craft Cannabis, Inc.  
616 Douglas Street, Uxbridge, MA 01569

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

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

The application was reopened one (1) time for additional information.

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

Type	Status	Location
Retail	Application Submitted	Provincetown

Individuals and entities associated with this application are also associated with a Pre-Delivery Certification application under the name of Ideal C2, Inc.

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

Individual	Role
Nicholas Saba	Executive / Officer
Joseph Daly	Executive / Officer
Patrick Stack	Executive / Officer
Edward Daly	Capital Contributor

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

Provisional License Executive Summary 1



Entity	Role
Ed Alone, LLC	Entity with Direct or Indirect Authority

6. Applicant's priority status:

Expedited Applicant (Social Equity Participant)  
(Nicholas Saba—40% ownership—SE303568)

7. The applicant and municipality executed a Host Community Agreement on October 26, 2021.
8. The applicant conducted a community outreach meeting on November 25, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on February 18, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Donate \$2,500 annually to New England Veterans Alliance to enhance its ability to cultivate veterans through alternative therapeutic programs. NEVA offers support, education and/or job training to Massachusetts residents disproportionately impacted by the War on Drugs.
2	Commit \$2,500 per calendar year to its Cannabis Expungement Program that will provide financial assistance for legal/filing fees for up to five (5) individuals from areas of disproportionate impact in an attempt to expunge cannabis criminal charges from their record.

### **SUITABILITY REVIEW**

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

### **MANAGEMENT AND OPERATIONS REVIEW**

13. The applicant states that it can be operational within three (3) months of receiving the provisional license(s).



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

**Cultivation**

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

**Product Manufacturing**

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

Thursday: 9:00 a.m. – 8:00 p.m.

Friday - Sunday: 8:00 a.m. – 8:00 a.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	Achieve at least 51% of its staffing needs from people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, Women, Veterans, Persons with disabilities, and LGBTQ+ individuals.

17. Summary of cultivation plan (if applicable):

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

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

#	Product
1	Flower (Indica, Sativa, Hybrid, varieties in the form of loose flower and pre-rolls)
2	Kief (Cannabis extract in single gram containers)

## **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. Final licensure is subject to the applicant providing Commission staff, upon inspection, with a detailed list of all proposed products to be produced with specific information as to types, forms, shapes, colors, and flavors;



4. The applicant shall cooperate with and provide information to Commission staff; and
5. Provisional licensure is subject to the payment of the appropriate license fee.

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



**LC SQUARE, LLC**  
MPN282013

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

LC Square, LLC  
173 Howland Avenue, Adams, Massachusetts 01220

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

Product Manufacturing

The application was reopened once (1) for additional information.

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

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

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

Individual	Role
Arthur Babayan	Owner/Partner

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

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

6. Applicant's priority status:





## General Applicant

7. The applicant and municipality executed a Host Community Agreement on August 23, 2018.
8. The applicant conducted a community outreach meeting on January 13, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 15, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Give hiring preference (40%) to Past or present residents of the geographic areas of disproportionate impact, specifically North Adams; Commission-designated Economic Empowerment Priority applicants; Commission-designated Social Equity Program participants; Massachusetts residents who have past drug convictions; and Massachusetts residents with parents or spouses who have drug convictions.
2	Source 35% of its vendors, contractors and builders located in North Adams or whose owners and employees are individuals who qualify for the Commissions Social Equity Program.

## **SUITABILITY REVIEW**

11. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

## **MANAGEMENT AND OPERATIONS REVIEW**

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

Monday – Sunday: 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	Comprise a staff and management team of at least 50% women and 30% minorities, veterans, people with disabilities and people identifying as LGBTQ+.
2	Source 20% of its suppliers, contractors and wholesale partners from businesses owned by minorities, women, veterans, people with disabilities; and/or people identifying as LGBTQ+.

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

#	Product
1	Rosin
2	Ice Water Hash
3	Shatter
4	Wax
5	Vaporizer Cartridges
6	Chocolate bars (rectangular in shape)
7	Hard lozenges (square in shape); lemon and cherry flavor.
8	Gummies (square in shape); lemon and cherry.
9	Cookies (round in shape)
10	Brownies (rectangular in shape)

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

LC Square, LLC plans to obtain marijuana from its affiliated licenses.

## **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

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



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



**LEAF RELIEF, INC.**  
MRN283784

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Leaf Relief, Inc.  
165 Westgate Drive, Brockton, Massachusetts 02301

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

Retail

The application was reopened twice (2) for additional information.

3. The applicant is 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
Eric Holstein	Owner/Partner
Anthony Ackil	Owner/Partner
John Jeha	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 October 9, 2018.
8. The applicant conducted a community outreach meeting on June 11, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent the municipal notice to the City/Town of Brockton on January 8, 2021. To date, the Commission has not received a response.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Participate in at least four (4) neighborhood clean-up events in Brockton, fall River and Taunton (target communities) per year.
2	Provide one (1) cannabis retail workshop per year and one (1) capital raising workshop per year for Massachusetts residents that have past drug convictions or those with parents or spouses who have drug convictions or who live in the target communities.
3	Give hiring preference (10%) to individuals residing in the target communities.
4	Source 25% of its contractors from the target communities.

### **SUITABILITY REVIEW**

11. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.
12. There were no concerns arising from background checks on the individuals or entities associated with the application.

### **MANAGEMENT AND OPERATIONS REVIEW**

13. The applicant states that it can be operational within one (1) year of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:  
  
Monday – Sunday: 8:00 a.m. – 8:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:



#	Goal
1	Give hiring preference (10%) to minorities, women, veterans, people with disabilities and people identifying as LGBTQ+.
2	Ensure that at least 25% of minorities, women, veterans, people with disabilities and people identifying as LGBTQ+ will hold management and executive positions.

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

Leaf Relief, Inc. will obtain marijuana or marijuana products by contracting with other licensed establishments.

## **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws and local codes, ordinances, and bylaws (including the issuance of a local license);
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.



**MORNING DEW, LLC**  
MBN282152

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Morning Dew, LLC  
47 Daniel Shays Highway, Orange, Massachusetts 01364

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

Microbusiness (Cultivation)

The application was reopened twice (2) for additional information.

3. 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
Lori Kaltner	Owner
Victoria Kaltner	COO
Patrick Kaltner	Facility Director
Zachary Peele	Director of Cultivation

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

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

6. Applicant's priority status:

Expedited Applicant (Woman-Owned Business and License Type)



7. The applicant and municipality executed a Host Community Agreement on January 7, 2021.
8. The applicant conducted a community outreach meeting on December 12, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 1, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide free technical training and free mentoring to at least three (3) individuals age 21+ each year who are past or present Residents of Greenfield, or Amherst through a Cultivation Skill-BUILDER 4-Week Incubator Program run by Morning Dew staff.
2	Contribute two (2) \$1,000.00 donations on a biannual basis to the Holyoke-based charity Entrepreneurship for All (EforAll).

### **SUITABILITY REVIEW**

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

### **MANAGEMENT AND OPERATIONS REVIEW**

13. The applicant states that it can be operational within one (1) year of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:  
  
Monday – Sunday: 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
---	------





<b>1</b>	Provide a free training program to at least two (2) individuals age 21+ each year who are minorities, women, veterans, people with disabilities, or people identifying as LGBTQ+, through a Cultivation Skill-BUILDER 4-Week Incubator Program.
<b>2</b>	Morning Dew will commit to equitable partnerships that require its establishment to partner with at least two (2) women-owned service providers annually – including but not limited to retaining a contract with a women-owned law firm and hiring a women-owned marketing consultant.

17. Summary of cultivation plan (if applicable):

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

### **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations;
2. Final license is subject to inspection to ascertain compliance with applicable state laws 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.



**NUESTRA, LLC**  
MRN283974

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Nuestra, LLC  
d/b/a The Boston Garden  
1185 Chestnut Street, Newton, Massachusetts, 02464

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

Retail

The application was reopened once (1) for additional information.

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

Type	Status	Location
Retail	Provisional License	Cambridge

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

Individual	Role
Renata Caines	Executive/Officer
Ivelise Rivera	Owner/Partner
Shaquille Anderson	Manager
Jonathan Tucker	Executive/Officer
Tara Tucker	Manager
Arthur White	Executive/Officer

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

Provisional License Executive Summary 1



Entity	Role
Commonwealth Farm 1761, Inc.	Investor/Contributor
Mikaz, LLC	Partner
Herban Legends of Boston, LLC	Partner

6. Applicant's priority status:

Priority Review—Economic Empowerment Priority Applicant  
(Ivelise Rivera/Renata Caines—51% ownership—EE202121)

7. The applicant and municipality executed a Host Community Agreement on January 22, 2021.
8. The applicant conducted a community outreach meeting on February 22, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 5, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide CORI sealing clinics to four (4) individuals from a geographical location designated as an area of disproportionate impact, specifically Quincy and Chelsea.

### **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 nine (9) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Monday – Saturday: 10:00 a.m. – 8:00 p.m.  
Sunday: 11:00 a.m. – 8:00 p.m.



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

#	Goal
1	Give hiring preference to women (50%), minorities (20%), veterans, people with disabilities and people identifying as LGBTQ+ (10%).

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

Nuestra, LLC will obtain marijuana or marijuana products by contracting with other licensed establishments.

## **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

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

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



**R AND R VENTURES, LLC**  
MBN281504

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

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

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

Microbusiness (Cultivation and Product Manufacturing Operations)

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
Robert Cohen	Manager
Robert Burnell	Owner / Partner
Maura Stanton	Owner / Partner
Amy Cohen	Owner / Partner
William Stanton	Owner / Partner
Michelle Sylvester	Owner / Partner

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

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



6. Applicant's priority status:  
Expedited Applicant (License Type)
7. The applicant and municipality executed a Host Community Agreement on June 30, 2020.
8. The applicant conducted a community outreach meeting on February 11, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 17, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Provide \$12,000 annually to The Last Prisoner Project.
2	Provide Equity Services for Economic Empowerment participants and Social Equity Program participants, who may be seeking pro bono or reduced rate services.

### **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 25 weeks of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:  
  
Monday – Friday: 9:00 a.m. – 5:00 p.m.  
Saturday – Sunday: Closed
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.
16. The applicant proposed the following goals for its Diversity Plan:



#	Goal
1	Comprise a Management/Executive Team of at least 25% women, 25% BIPOC.
2	Provide “inclusive leadership” training to all individuals who are in leadership roles. Content of training will specifically cover topics such as: privilege, implicit bias, micro-aggressions, and micro-affirmations.

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	Cannabis Flower
2	Bubble Hash
3	Granola Bars (Cranberry/Pepita Oat Bar)
4	Mint Lozenges

## **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. Final licensure is subject to the applicant providing Commission staff, upon inspection, with a detailed list of all proposed products to be produced with specific information as to types, forms, shapes, colors, and flavors;
4. The applicant shall cooperate with and provide information to Commission staff; and
5. Provisional licensure is subject to the payment of the appropriate license fee.

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



**RC RETAIL PRINCETON, LLC**  
MRN283815

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

RC Retail Princeton, LLC  
d/b/a Red Cardinal  
104 Main Street, Princeton, Massachusetts, 01541

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

Retail

The application was not reopened 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	Amherst
Retail	Provisional License	Westfield
Cultivation, Tier 11/Indoor (90,001 – 100,000 sq. ft.)	Provisional License	Worcester
Product Manufacturing	Provisional License	Worcester

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

Individual	Role
Salvatore Carabetta	Capital Contributor

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

Entity	Role
--------	------

Provisional License Executive Summary 1





Red Cardinal MA, LLC	Owner and Managing Member of RC Retail Princeton, LLC
----------------------	-------------------------------------------------------

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on December 1, 2020.
8. The applicant conducted a community outreach meeting on September 10, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 9, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	Contribute an annual monetary donation of \$2,500.00 to Girls, Inc. of Worcester.
2	Provide two (2) annual CORI sealing seminars for individuals with past drug convictions.

### **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 nine (9) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:
- Monday – Sunday: 8:00 a.m. – 9:00 p.m.
15. The applicant submitted all applicable and required summaries of plans, policies, and procedures for the operation of the proposed establishment. The summaries were determined to be substantially compliant with the Commission's regulations.



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

#	Goal
1	Give hiring preference to women (40%), minorities (10%), veterans (6%), people with disabilities (6%) and people identifying as LGBTQ+ (6%).

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

RC Retail Princeton, LLC plans to obtain marijuana from its affiliated licenses.

### **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

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

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



**TEMPEST, INC.**  
MRN282429

**BACKGROUND & APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

Tempest, Inc.  
420 State Road, Phillipston, Massachusetts, 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 twice (2) for additional information.

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

Type	Status	Location
Retail	Provisional License	Templeton

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

Individual	Role
Damon Schmidt	Owner/Partner

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

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

6. Applicant's priority status:

Expedited Application (Social Equity Participant)



(Damon Schmidt—100% ownership—SE303857)

7. The applicant and municipality executed a Host Community Agreement on June 3, 2020.
8. The applicant conducted a community outreach meeting on November 30, 2020 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the municipality on March 11, 2021 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Positive Impact Plan:

#	Goal
1	In year one Tempest will successfully train, mentor, and help to launch a new marijuana business for a minimum of one (1) Social Equity participant as defined by the Commission. Tempest's majority owner will help with the financial contribution to the participant(s) to ensure success.

### **SUITABILITY REVIEW**

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

### **MANAGEMENT AND OPERATIONS REVIEW**

13. The applicant states that it can be operational within eight (8) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:  
  
Monday – 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
---	------



<b>1</b>	Give hiring preference to women (25%), minorities (10%), veterans (5%), people with disabilities (5%) and people identifying as LGBTQ+ (5%).
----------	----------------------------------------------------------------------------------------------------------------------------------------------

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

Tempest, Inc. will obtain marijuana or marijuana products by contracting with other licensed establishments.

## **RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

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

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



Category of Delegations	Authority Delegated	Delegated to:	Primary Regulatory Citations	Reporting to Commission
<b>General Regulatory Authority</b>				
	Interpret and apply regulations under 935 CMR 500.000 and 501.000	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.000; 935 CMR 501.000	
	<b>Interpret, apply, and ministerially update or amend guidance associated with any delegated area of authority. This delegation, however, does not constitute authority to substantively replace, eliminate, or create guidance.</b>	<b>Executive Director and to appropriate Commission staff in his discretion.</b>		
	Review the petitions for regulatory change, to determine whether a petition should be resolved with or without a recommendation to the full Commission, and take actions consistent with this regulatory process.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.830; 935 CMR 501.830	
<b>Commission Operations/Administration</b>				
	Authority to hire staff, subject to Commission approval of job descriptions.	Executive Director and to appropriate Commission staff in his discretion.		
	Authority to approve all procurement and contract awards up to \$492,000 and any open bid contracts up to \$150,000, provided the Commission be informed in regular reports from the Executive Director of procurements below those thresholds.	Executive Director and to appropriate Commission staff in his discretion.		
	To establish processes and procedures for instances in which the regulations denote "a form and manner determined by the Commission."	Executive Director and to appropriate Commission staff in his discretion.		
	<b>Approve, interpret, apply, modify, or waive requirements under the Protocol for Sampling and Analysis of Finished Marijuana and Marijuana Products for Marijuana Establishments, Medical Marijuana Treatment Centers and Colocated Marijuana Operations. Provided, however, that notice of such instances be provided to the Commission.</b>	<b>Executive Director and to appropriate Commission staff in his discretion.</b>	<b>935 CMR 500.160; 935 CMR 501.160</b>	<b>Yes</b>
	Appoint members to the Energy and Environment Working Group.	Executive Director and to appropriate Commission staff in his discretion.	St. 2017, c. 55, § 78(b)	
	Approve or deny applications for Energy Compliance Extensions.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.120(1)(g); 935 CMR 501.120(12)(g)	
	Approve or deny to approve Social Equity Program applicants.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.105(17)	
	Authority, on a case by case basis, to disclose confidential information as permitted by 935 CMR 500.820(2) and 501.820(2).	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.820(2)(b); 935 CMR 501.820(b)	
<b>Licensing (Adult and Medical)</b>				
	General authority to administer and operationalize the licensing application process for Marijuana Establishments and Medical Marijuana Treatment Centers.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.101; 935 CMR 500.102; 935 CMR 500.103; 935 CMR 501.101; 935 CMR 501.102; 935 CMR 501.103	
	Approve or deny Delivery Pre-Certification.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.101(2)(c)	
	Authority to make suitability determinations and establish the Suitability Review Committee.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.031(6); 935 CMR 501.031(6); 935 CMR 500.032(3); 935 CMR 501.032(5)-(6); 935 CMR 500.800(2), (4), (5); 935 CMR 501.800(2), (4), (5)	
	Approve or deny a proposed cure to a negative suitability determination.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.800(4)(d); 935 CMR 501.800(4)(d)	
	Authority to review and approve of architectural plans	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.103(1)(a); 935 CMR 501.103(1)(a)	
	Issue an Invitation to Management Operations Plan	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.101(2)(b)	
	Approve recommendations to commence operations and issue notices to commence operations.	Executive Director and to appropriate Commission staff in his discretion.	G.L. 94G, § 12(g); 935 CMR 500.103(2) 935 CMR 501.103(2); and Guidance on Licensing, Section IV, page 48.	
	Distribution and acquisition of marijuana	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.105(8)(g); 935 CMR 140(15); 935 CMR 501.105(8)(j) and (k)	
	Authority to screen petitions for reconsideration and to notify the Commission of their determinations.	Executive Director and to appropriate Commission staff in his discretion.	G.L. c. 30A, § 14(1)	Yes
	<b>Review notifications of Change of Ownership &amp; Control, assess Economic Empowerment Priority Applicant eligibility, and affirm or revoke applicants'/licensees' status as Economic Empowerment Priority Applicants based on the information contained in the notification. Provided, however, that notice of such assessments and outcomes be provided to the Commission.</b>	<b>Executive Director and to appropriate Commission staff in his discretion.</b>	<b>935 CMR 500.104(1)(b)(3)(b)</b>	<b>Yes</b>
<b>Change Request (Adult and Medical)</b>				
	General authority to administer and operationalize the Change Request process for Marijuana Establishments and Medical Marijuana Treatment Centers.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.104(1); 935 CMR 501.104(1)	
	Approve or deny applications Corporate Reorganization/Conversion (provided equity proportions remain the same)	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.104(2)(e); 935 CMR 501.104(2)(e)	Yes
	Approve or deny applications for Name Change	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.104(2)(b); 935 CMR 501.104(2)(b)	Yes
	Approve or deny applications for change in Ownership where the change in equity ownership is less than 10%	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 104(2)(c); 935 CMR 501.104(2)(c)	Yes
	Approve or deny applications for a change of Location	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.104(2)(a); 935 CMR 501.104(2)(a)	Yes
	Approve or deny applications to make structural changes (renovations etc.) to the licensee's Premises.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.104(1)(c); 935 CMR 501.104(1)(c)	Yes
	Authority to the Executive Director to approve applications and authorize operations for Delivery Endorsements for licensed Marijuana Microbusinesses that have complied with Commission requirements pertaining to delivery operations.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.050(5)	
<b>Agent Registration (Adult and Medical)</b>				
	General authority to administer and operationalize the Agent Registration process for Agents of Marijuana Establishments, Medical Marijuana Treatment Centers, and Independent Testing Laboratories	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.029; 935 CMR 500.031; 935 CMR 500.032; 935 CMR 501.029; 935 CMR 501.030; 935 CMR 501.031; 935 CMR 501.032	
	Approval, Denial, and Revocation of Medical Use Laboratory Agent Annual and Renewal Registration	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.029; 935 CMR 501.031; 935 CMR 501.032	
	Approval, Denial, or Revocation Adult Use Laboratory Agent Annual and Renewal Registration	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.029	

	Approval, Denial, and Revocation of Marijuana Establishment Agent Registration Change in Information.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.030; 935 CMR 500.031; 935 CMR 500.032	
	Approval, Denial, and Revocation of Medical Marijuana Treatment Center Agent Registration Change in Information	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.030; 935 CMR 501.031; 935 CMR 501.032	
	Medical and Adult Use Lab Agent Registration Change In Information	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.029(7); 935 CMR 501.029(7)	
<b>Administrative Investigations and Enroachment (Adult and Medical)</b>				
	General authority to administer and operationalize the Administrative Investigations and Enforcement processes for with respect to Commission Licensees and Registrants.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.300 through 500.370; 935 CMR 501.300 through 501.370; 935 CMR 500.500; 935 CMR 501.500	
	Conducting Inspections and Compliance Examinations	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.301; 935 CMR 501.301; 935 CMR 500.302; 935 CMR 501.302	
	Conduct Secret Shopper Program	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.303; 935 CMR 501.303	
	To receive complaints and determine whether to investigate, decline to investigate, refer a complaint to another law enforcement or regulatory authority.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.300; 935 CMR 501.300	
	Approve or deny circumstances as a "documented emergency" for the purposes of an MTC acquiring or distributing Marijuana and Marijuana products to another MTC.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.105(8)(j)2	
	Issue Deficiency Statements	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.310; 935 CMR 501.310	
	Review, Deny, Modify, or Accept Plans of Correction	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.320; 935 CMR 501.320	
	Issue a Cease and Desist Order or a Summary Suspension Order	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.350; 935 CMR 501.350	
	Issue a Quarantine Order	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.340; 935 CMR 501.340	
	Issue an Administrative Hold	Executive Director and to appropriate commission staff in his discretion.	935 CMR 500.321; 935 CMR 501.321	
	Issue a Limitation on Sale	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.330; 935 CMR 501.330	
	Order the removal of or prohibit sales of products.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.335; 935 CMR 501.335	
	To designate a hearing officer and conduct administrative hearings.	Executive Director and to appropriate Commission staff in his discretion	935 CMR 500.500(5); 935 CMR 500.350(5); 935 CMR 501.350(5); 935 CMR 500.500(5); 935 CMR 501.500(5).	
<b>Waiver Requests</b>				
	Waiver of Fees	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.005(1)(b)	
	General Waivers - any regulatory requirement not specifically reserved by the Commission. Executive Director will have authority to waive regulatory requirements, including those established by sub-regulatory guidance established by the Commission.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.850; 935 CMR 501.850	
	Alternative Security/Access	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.110(2); 935 CMR 501.110(2).	
<b>Court Appointees (Adult and Medical)</b>				
	Determine form and manner of application to be a Preapproved Court Appointee	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.104(3)(b)(1); 935 CMR 501.104(3)(b)(1)	Yes
	Preapprove, recommend, disqualify, or discipline Court Appointees	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.104(3)(b)(2); 935 CMR 501.104(3)(b)(2)	
	Approve distribution of escrow funds under 935 CMR 500.105(10) and 501.105(10). Subject to court order prior to expenditure of such funds.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.104(3)(b)(3); 935 CMR 104(3)(b)(3)	
	Approve the use of additional funds subject to the receipt of a court order prior to expenditure of such funds.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.104(3)(b)(4); 935 CMR 104(3)(b)(4)	
	Preapprove or approve certain transactions, provided, however, any change in ownership or control 935 CMR 500.104(1) or 935 CMR 501.104(1) shall be considered by the Commission.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.104(3)(b)(5); 935 CMR 104(3)(b)(5)	
	To impose fines or other disciplinary action under 935 CMR 500.500 or 501.500, provided, however, any suspension or revocation of a License under 935 CMR 500.450 or 501.450 shall be considered by the Commission.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.104(3)(b)(6); 935 CMR 104(3)(b)(6)	
	Approval of Assignments for the Benefit of Creditors.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 500.104(4); 935 CMR 501.104(4)	
<b>Certifying Healthcare Provider Applications</b>				
	Approval of applications for Certifying Physicians, Certifying Nurse Practitioners, and Certifying Physician Assistant	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.006; 935 CMR 501.007; 935 CMR 501.008.	
	Alternative to Using the Massachusetts Prescription Monitoring Program	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.010(6)	
	Change in information for Certifying Physicians, Certifying Nurse Practitioners, and Certifying Physician Assistant	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.006(4); 935 CMR 501.007(4); 935 CMR 501.008(4).	
<b>Patient Registration</b>				
	Approval of change in information.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.015(6)	
	Issue Certificate of Registration to Caregiving Institutions.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.021	

	Approval of temporary registration and supply	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.015(1), (3) and 5	
	Approve or deny patient applications for Hardship Cultivation Registration.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.027	
<b>Personal Caregiver Registration</b>				
	Approval of annual and renewal Personal Caregiver registration cards.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.020(1) and (3)	
	Approval of temporary Personal Caregiver registration card.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.020(2)	
	Change in information regarding the registration of a Personal Caregiver	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.020(9)	
	Patient change or additional of a personal caregiver.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.020(8)	
<b>Institution Caregiver Registration</b>				
	Approval or denial of annual and renewal registration of Institutional Caregivers	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.022(1) and (2)	
	Change in information with respect to an Institutional Caregiver registration.	Executive Director and to appropriate Commission staff in his discretion.	935 CMR 501.022(6)	



**Request for Response (RFR)**

**Document Title: Social Equity Program Materials & Services**

**COMMBUYS Bid#: [generated on date of posting]**

Please Note: This is a single document associated with a complete Bid (also referred to as Solicitation) that can be found on [COMMBUYS](http://www.COMMBUYS.com) ([www.COMMBUYS.com](http://www.COMMBUYS.com)). All Bidders are responsible for reviewing and adhering to all information, forms and requirements for the entire Bid, which are all incorporated into the Bid. Bidders may also contact the COMMBUYS Helpdesk at [OSDHelpDesk@mass.gov](mailto:OSDHelpDesk@mass.gov) or the COMMBUYS Helpline at 1-888-627-8283. The Helpline is staffed from 8:00 AM to 5:00 PM Monday through Friday Eastern Standard or Daylight time, as applicable, except on federal, state and Suffolk county holidays.



<b>1</b>	<b><u>RFR INTRODUCTION AND GENERAL DESCRIPTION .....</u></b>	<b><u>5</u></b>
1.1	Procurement Scope and Description .....	5
1.2	Background information.....	5
1.3	Applicable Procurement Law.....	6
1.4	Number of awards .....	6
1.5	Adding Contractors after initial Contract award .....	6
1.6	Eligible Entities.....	6
1.7	Acquisition Method .....	7
1.8	Contract Duration .....	7
<b>2</b>	<b><u>ESTIMATED PROCUREMENT CALENDAR .....</u></b>	<b><u>8</u></b>
2.1	Written questions via the Bid Q&A on COMMBUYS .....	8
2.2	Locating Bid Q&A.....	9
2.3	Amendment Deadline.....	9
2.4	Bidders' Conference.....	10
2.5	Withdrawal of RFR.....	10
2.6	Oral Presentations.....	10
<b>3</b>	<b><u>SPECIFICATIONS.....</u></b>	<b><u>10</u></b>
3.1	Vendor Qualifications .....	10
3.1.1	Company certifications and affiliations .....	10
3.1.2	Company experience.....	11
3.1.3	Contract Management.....	11
3.1.4	References and reference information and/or requirements .....	12
3.1.5	Employee requirements .....	12
3.1.6	Professionalism.....	13
3.2	Service Specifications .....	13
3.2.1	Design requirements .....	13
	Course Descriptions and Learning Objectives:.....	16
3.2.2	Training & training materials .....	28
3.3	Complete Response.....	28
3.4	Compensation Structure/Pricing .....	33
<b>4</b>	<b><u>OTHER TERMS.....</u></b>	<b><u>34</u></b>



4.1	Continued qualification based on performance.....	34
4.2	Reporting.....	35
4.3	Security and confidentiality.....	35
4.4	Alternatives .....	36
4.5	Failure to perform contractual obligations as outlined in the Standard Contract Form, Terms and Conditions, and RFR may result in the following: .....	36
4.6	Confidentiality .....	36
4.7	Closing Date.....	36
4.8	Response Duration .....	36
4.9	Acceptance of Response Content .....	36
4.10	Option to Modify Scope of Work.....	37
4.11	Authorizations and Appropriations.....	37
4.12	Template Statement of Work .....	37
<b>5</b>	<b><u>AUDIT.....</u></b>	<b>37</b>
<b>6</b>	<b><u>EVALUATION CRITERIA .....</u></b>	<b>37</b>
6.1	Alternatives .....	39
<b>7</b>	<b><u>HOW TO SUBMIT A QUOTE .....</u></b>	<b>39</b>
7.1	Quote Submission Method.....	39
7.2	COMMBUYS Quote Submission Training and Instructions.....	40
7.3	COMMBUYS Support.....	40
7.4	Bid Opening Date/Time .....	40
7.5	Quote Contents .....	41
7.5.1	Electronic Signatures.....	41
7.5.2	Ink Signatures .....	41
7.6	Limits and Restrictions.....	41
7.6.1	File Format Restrictions.....	42
7.6.2	Documents and items that cannot be submitted electronically.....	42
7.7	Withdrawing a Quote.....	42
7.7.1	Prior to Bid Opening Date/Time.....	42
7.7.2	After Bid Opening Date/Time.....	42
7.8	Additional Quote Terms .....	42
7.8.1	Prohibition regarding contract terms .....	42



<b>8</b>	<b><u>APPENDIX 1 – REQUIRED TERMS FOR ALL RFRS</u></b>	<b><u>44</u></b>
8.1	General Procurement Information	44
8.1.1	Alterations	44
8.1.2	Ownership of Submitted Quotes	44
8.1.3	Prohibitions	44
8.2	Terms and Requirements Pertaining to Awarded Contracts	45
8.2.1	Commonwealth Tax Exemption	45
8.2.2	Vendor’s Contact Information	45
8.2.3	Publicity	45
<b>9</b>	<b><u>APPENDIX 2 - RFR - REQUIRED SPECIFICATIONS</u></b>	<b><u>45</u></b>
<b>10</b>	<b><u>APPENDIX 3 - INSTRUCTIONS FOR EXECUTION AND SUBMISSION OF COMMONWEALTH STANDARD FORMS</u></b>	<b><u>50</u></b>
10.1	Commonwealth Standard Contract Form	50
10.2	Commonwealth Terms and Conditions	51
10.3	Request for Taxpayer Identification Number and Certification (Mass. Substitute W9 Form)	51
10.4	Contractor Authorized Signatory Listing	51
10.5	Supplier Diversity Program Plan Form 1	52
10.6	Prompt Payment Discount Form	52
10.7	Business Reference Form	53
<b>11</b>	<b><u>APPENDIX 4 – INSTRUCTIONS FOR VENDORS RESPONDING TO BIDS ELECTRONICALLY THROUGH COMMBUYS</u></b>	<b><u>54</u></b>
<b>12</b>	<b><u>APPENDIX 5 – TEMPLATE STATEMENT OF WORK</u></b>	<b><u>58</u></b>
<b>13</b>	<b><u>APPENDIX 6 – TEMPLATE INTELLECTUAL PROPERTY AND WORK EFFORT AGREEMENT IPWEA</u></b>	<b><u>83</u></b>



## 1 RFR INTRODUCTION AND GENERAL DESCRIPTION

### 1.1 Procurement Scope and Description

The Commonwealth of Massachusetts Cannabis Control Commission (**Commission**) is soliciting responses from vendors (**Vendors**) for the acquisition of professional training and technical assistance services and materials for August 2, 2021 to July 31, 2022, to support applicants and licensees participating in the Social Equity Program established under 935 CMR 500.105(17). This Request for Responses (**RFR** or **Bid**) will result in the selection of multiple vendors (**Selected Vendors** or **Qualified Vendors List**) to provide services under a contract that will serve as part of the Commission Master Agreement (**Commission Master Agreement** or **Contract**) used solely by the Commission for the services covered by the Master Agreement.

The Commission Master Agreement between the Commission and Selected Vendors consists of the following documents in the following order of precedence: (1) the Commonwealth Standard Terms and Conditions; (2) the Commonwealth's Standard Form Contract; and (3) this RFR Bid # [generated on date of posting].

### 1.2 Background information

The Commission is responsible for safely, equitably and effectively implementing the laws governing the adult-use and medical-use marijuana industry in the Commonwealth, specifically, G.L. c. 94G, G.L. c. 94I, 935 CMR 500.000, 935 CMR 501.000, and the enabling legislation, St. 2016, c. 334, *The Regulation and Taxation of Marijuana Act*, as amended by St. 2017, c. 55, *An Act to Ensure Safe Access to Marijuana*.

Regulation 935 CMR 500.105(17) requires the Commission to establish the Social Equity Program (**Program**) to provide training and technical assistance to eligible applicants and licensees which may include, but shall not be limited to:

1. Management, recruitment and employee trainings;
2. Accounting and sales forecasting;
3. Tax prediction and compliance;
4. Legal compliance;
5. Business plan creation and operational development;
6. Marijuana industry best practices;
7. Assistance with identifying or raising funds or capital; and
8. Such other topics as the Commission shall identify.

Generally, SEP participants who have been impacted by marijuana prohibition or are from communities that have been disproportionately impacted by marijuana prohibition are eligible to participate in the Program. Eligibility for the Program is set forth in 935 CMR 500.105(17).

The Program aims to decrease the disparities in life outcomes for people from communities that have been



disproportionately harmed by marijuana law enforcement and improve the quality of life in areas of disproportionate impact; and reduce barriers to entry into and promote sustainable, socially and economically reparative practices in the regulated cannabis industry in the Commonwealth.

The Program will connect qualified vendors with Program participants, who will be on pre-selected curriculum tracks. Tracks will be chosen based on the Program participants' area of interest in the cannabis industry, their current skillsets and knowledge base, and their desired goals. Each track will provide comprehensive programming and hands-on guidance coupled with skills-based training to those most impacted by marijuana prohibition and enforcement.

### **1.3 Applicable Procurement Law**

This RFR is issued under the following law(s):

- MGL c. 7, § 22; c. 30, § 51, § 52; and 801 CMR 21.00 (Goods and Services)

### **1.4 Number of awards**

The Commission seeks multiple vendors. The target maximum number of vendors is 3-5. This is a target number; the Commission may select more or fewer vendors, based on the needs of the Program, and if it is in the best interests of the Commonwealth to do so. The intent of this RFR is to establish and maintain a Qualified Vendors List from which the Commission can select for purposes of meeting Program goals and objectives.

### **1.5 Adding Contractors after initial Contract award**

If, over the life of the Commission Master Agreement, the Commission determines that additional vendors should be added to the Qualified Vendors List, these may first be drawn from qualified vendors which responded to this RFR but were not awarded contracts. If necessary to meet the requirements of the Commission, the RFR may be reopened to obtain additional responses.

Non-successful bidders are not entitled to debriefings; and the Commission will consider debriefings only at its sole discretion.

### **1.6 Eligible Entities**

Any contract resulting from this RFR will be open for use to the Commission only.



### 1.7 Acquisition Method

The acquisition method to acquire services from this RFR is Fee for Service.

### 1.8 Contract Duration

The expected duration of this contract is as follows:

Contract Duration	Number of Options	Number of Years/Months
Initial Duration		From the execution date through 07/31/2022
Renewal Options	1	
Total Maximum Contract Duration		From the execution date through 07/31/2023

No other agreements for services may be executed after the Commission Master Agreement has expired.



## 2 Estimated Procurement Calendar

EVENT	DATE
<b>Bid Release Date</b>	4/16/2021
<b>Bidder's Conference</b>	4/26/2021 – Time TBD Virtual via Teams Live
<b>Deadline for Submission of Questions through COMMBUYS “Bid Q&amp;A”</b>	5/5/2021
<b>Official Answers for Bid Q&amp;A published (Estimated)</b>	5/12/2021
<b>Bid Amendment Deadline / Online Quote submission begins. Bid documents will not be amended after this date.</b>	5/14/2021
<b>Deadline for Quotes/Bid Responses (“Bid Opening Date/Time” in COMMBUYS)</b>	05/21/2021
<b>Oral Presentations for Selected Vendor(s) (Estimated)</b>	6/10/2021 - 6/18/2021 Virtual via Teams Live
<b>Notification of Apparent Successful Vendor(s) (Estimated)</b>	7/1/2021
<b>Negotiations (Estimated)</b>	7/2/2021-7/30/2021
<b>Estimated Contract Start Date</b>	8/2/2021-9/1/2021

Times are Eastern Standard/Daylight Savings (US), as displayed on the COMMBUYS system clock displayed to Vendors after logging in. If there is a conflict between the dates in this Procurement Calendar and dates in the Bid's Header, the dates in the Bid's Header on COMMBUYS shall prevail. Vendors are responsible for checking the Bid record, including Bid Q&A, on COMMBUYS for Procurement Calendar updates.

### 2.1 Written questions via the Bid Q&A on COMMBUYS

The “Bid Q&A” provides the opportunity for Vendors to ask written questions and receive written answers from the Commission regarding this Bid. All Vendors' questions must be submitted through the Bid Q&A





found on COMMBUYS (see below for instructions). Questions may be asked only prior to the Deadline for Submission of Questions stated in the Estimated Procurement Calendar. The Commission reserves the right not to respond to questions submitted after this date. It is the Vendor's responsibility to verify receipt of questions.

Please note that any questions submitted to the Commission using any other medium (including those that are sent by mail, fax, email or voicemail, etc.) will not be answered. To reduce the number of redundant or duplicate questions, Vendors are asked to review all questions previously submitted to determine whether the Vendor's question has already been posted.

Vendors are responsible for entering content suitable for public viewing, since all of the questions are accessible to the public. Vendors must not include any information that could be considered personal, security sensitive, inflammatory, incorrect, collusory, or otherwise objectionable, including information about the Vendor's company or other companies. The Commission reserves the right to edit or delete any submitted questions that raise any of these issues or that are not in the best interest of the Commonwealth or this Bid.

**All answers are final when posted. Any subsequent revisions to previously provided answers will be dated.**

It is the responsibility of the prospective Vendor and awarded Vendor to maintain an active registration in COMMBUYS and to keep current the email address of the Vendor's contact person and prospective contract manager, if awarded a contract, and to monitor that email inbox for communications from the Commission, including requests for clarification. The Commission and the Commonwealth assume no responsibility if a prospective Vendor's/awarded Vendor's designated email address is not current, or if technical problems, including those with the prospective Vendor's/awarded Vendor's computer, network or internet service Vendor (ISP) cause email communications sent to/from the prospective Vendor/Awarded Vendor and the Commission to be lost or rejected by any means including email or spam filtering.

## **2.2 Locating Bid Q&A**

Log into COMMBUYS, locate the Bid, acknowledge receipt of the Bid, and scroll down to the bottom of the Bid Header page. The "Bid Q&A" button allows Vendors access to the Bid Q&A page.

## **2.3 Amendment Deadline**

The Commission reserves the right to make amendments to the Bid after initial publication. It is each Vendor's responsibility to check COMMBUYS for any amendments, addenda or modifications to this Bid, and any Bid Q&A records related to this Bid. The Commission and the Commonwealth accepts no responsibility and will provide no accommodation to Vendors who submit a Quote based on an out-of-date Bid or on information received from a source other than COMMBUYS.



## **2.4 Bidders' Conference**

The Bidders' Conference is the conference conducted by the Commission for the purpose of informing prospective Bidders about general Bid information and answering questions from prospective Bidders and will be held via webinar or phone. Attendance is optional. Please refer to the COMMBUYS website for any updated information, including the location, time, and date of the Bidders' Conference.

## **2.5 Withdrawal of RFR**

The Commission reserves the right to terminate this procurement in whole or in part at any time and without notice before or after submission of responses. It makes no guarantee that a contract, or an obligation to purchase materials or services, will result from this RFR.

## **2.6 Oral Presentations**

Selected Vendors who are asked to participate in Oral Presentations will be expected to prioritize this in their schedules. The Commission will make every effort to find a mutually convenient time for the Vendor and the Commission. However, failure to appear at the scheduled time of the presentation/demonstration may result in disqualification, reduction of points or other action that the Commission deems appropriate.

# **3 SPECIFICATIONS**

Additional required terms appear in the Appendices to this RFR.

## **3.1 Vendor Qualifications**

### **3.1.1 Company certifications and affiliations**

The Vendor shall provide a listing of the major resources and other sources (both domestic and international) that will enable the Vendor to perform the services contemplated by this RFR in a time-efficient and authoritative manner. These must include the following information:

- The individual or organization's name and address; and
- What this resource or information source will be used for.

Separately, Vendors must include any and all affiliations with the marijuana industry. All affiliations with the marijuana industry, including all affiliations with current and prospective applicants and licensees of the Commission, must be disclosed with the proposal. Any subsequent affiliation that occurs after the vendor's proposal is submitted must be proactively submitted to the Commission. Any change in



disclosed affiliations must be proactively submitted to the Commission. Based on information received from a Vendor, the Commission may require a Vendor to seek advice under the conflict of interest law from the State Ethics Commission and to disclose the advice received with the Commission.

The limit on each such disclosure is one (1) page.

### **3.1.2 Company experience**

The Vendor should include an organization chart showing the Vendor's entire organizational structure. This chart should show the relationship of the individuals assigned to a contract to the Vendor's overall organizational structure.

The Vendor should also include a contract organization chart, with names showing management, supervisory and other key personnel (including subcontractor management, supervisory or other key personnel) to be assigned to a contract. The chart should include the labor category and title of each such individual.

The Vendor, and its staff, must have demonstrated experience providing comparable materials and services.

- Beginning and ending dates should be given for each similar contract.
- A description of the contract should be given and should demonstrate how the work on a completed contract relates to the ability to contribute to successfully providing the services required by this RFR.
- With respect to each similar contract, the Vendor should include the name and address of each reference together with a person to contact for a reference check and a telephone number.
- Demonstrated experience can, for example, respond to the question: What does social equity mean to you and how does your business implement equity into its policies and practices?"

The Vendor should provide detailed resumes for each subcontractor's management, supervisory and other key personnel that demonstrate knowledge, ability and experience relevant to that part of the work which the subcontractor is designated to perform.

Vendor should include a maximum 2 page narrative describing Vendor's experience, approach and qualification to work with working with disproportionately impacted communities, specifically Black, African American, Latinx, and Indigenous people of color.

### **3.1.3 Contract Management**



The Vendor should describe its specific plans to manage, control and supervise a contract to ensure satisfactory contract completion according to the required schedule. The Vendor should include the address of the Vendor's office that will be responsible for managing a contract and the telephone number and name of the primary contact and its approach to communicate with the Commission's primary contact, including, but not limited to, status meetings, status reports, etc.

### **3.1.4 References and reference information and/or requirements**

Positive references must be available from private and public-sector clients for the specific services solicited.

### **3.1.5 Employee requirements**

Key staff must have demonstrated qualifications to provide professional training and technical assistance.

- Detailed resumes should be submitted for all management, supervisory and key personnel to be assigned to a contract. Resumes should be structured to emphasize relevant qualifications and experience of these individuals in successfully completing contracts of a similar size and scope to those required by this RFR. Resumes should include the following:
  - At the top of the resume, identify which of the following qualifications the individual possesses. It is highly desired that individuals possess at LEAST 3 of the following characteristics:
    - Demonstrated experience in relevant fields
    - Professional licensing experience
    - Cannabis industry experience
    - Demonstrated experience providing comparable materials and services.
    - Demonstrated experience working with disproportionately impacted communities, specifically Black, African American, Latinx, and Indigenous people of color.
    - Demonstrated experience developing content that complies with the Americans with Disability Act (**ADA**) and Section 508 of the Rehabilitation Act, or state accessibility requirements for the sight and hearing impaired.

Backup Staff: The Vendor should include a list of backup staff that may be called upon to assist or replace key individuals assigned. Backup staff must be clearly identified as backup staff. In the event the Vendor must hire management, supervisory and/or key personnel if awarded a contract, the Vendor should include, as part of its recruitment plan, a plan to secure backup staff in the event personnel initially recruited need assistance or need to be replaced during a contract term.

The Vendor should provide documented experience to demonstrate that each subcontractor has successfully performed work on contracts of a similar size and scope to the work that the subcontractor is



designated to perform in the Vendor's proposal. The Vendor must provide a detailed description of services to be provided by each subcontractor.

### **3.1.6 Professionalism**

To contract with the Commission, Selected Vendors must demonstrate a reputation for providing services in a manner that is professional, unbiased, and independent.

Prior to submission of the first Deliverable, Contractor must provide evidence to the Commission that each member of Key Personnel has completed an implicit bias training within the previous 12 months, or substantially similar training or experience that, to the satisfaction of the Commission's Point of Contact/Project Manager, qualifies Key Personnel to work, in an equitable and inclusive fashion, with diverse communities, including those historically marginalized or disproportionately impacted by the prohibition of cannabis.

Past or Pending Professional Discipline & Litigation: Each Vendor shall describe any previous instances of past or pending professional discipline or litigation relevant to the services solicited by this RFR.

## **3.2 Service Specifications**

### **3.2.1 Design requirements**

The Program aims to decrease the disparities in life outcomes for people from communities that have been disproportionately harmed by marijuana law enforcement and improve the quality of life in areas of disproportionate impact; and reduce barriers to entry into and promote sustainable, socially and economically reparative practices in the commercial adult-use marijuana industry in the Commonwealth.

The Commission seeks vendors to develop face-to-face and on-demand curriculum as well as provide professional training, technical assistance, mentoring, and associated materials and services, for individuals and businesses seeking assistance with entry into the adult-use marijuana industry through the Program.

The Program will connect Selected Vendors with Program participants, who will be on pre-selected curriculum tracks (see Table A). Tracks will be chosen based on the Program participants' area of interest in the cannabis industry, their current skillsets and knowledge base, and their desired goals. Each track will provide comprehensive programming and hands-on guidance coupled with skills-based training to those most impacted by marijuana prohibition and enforcement.

Selected Vendors will work with the Commission to develop curriculum and provide face-to-face and on-demand training, technical assistance and mentoring to Program participants from September 1, 2021 through June 30, 2022. Specifically, Vendors will:



1. Develop curriculum and provide education and training for at least one course according to the curriculum tracks listed in Table A below. A description of each course is also provided below.
  - a. Vendors must identify the specific course(s) for which they intend to provide training and on which corresponding track they fall.
  - b. Vendors must describe how their proposed trainings directly relate to the marijuana industry.
  - c. If Vendors wish to propose courses not listed in Table A, the Commission will consider only up to two other courses for each Vendor.
  - d. Each curriculum track will be conducted live in multiple physical or virtual locations across the Commonwealth with a commitment to providing digital access. The locations of live sessions will be re-evaluated and determined by application data and access to adequate meeting space for at least 65-100 applicants per track.
  - e. All courses will be available live.
  - f. All courses will run from Monday through Friday, with alternative time frames provided on Saturdays & Sundays.
  - g. All courses within each track flow sequentially into the next and will be taught in order of Table A. As vendors may propose new courses, Table A may be updated as necessary.
  - h. Vendors must indicate the proposed amount of time to complete each course (number of days and hours per days). Note: For reference each track will run for a duration of six months or less.
  - i. Vendors should propose course durations that are at maximum of 1-2 weeks; however, for skills-based trainings vendors should propose course durations that are at maximum 2-3 weeks.
  - j. Vendors should design courses appropriate for participants applying for (or planning to apply for) different license types.
  - k. Vendors should identify methods of assessing a participant's retention of information, completion and success of each course, mid-way and upon completion.
  - l. **Any and all curriculum and/or materials developed by the Vendor pursuant to this RFR becomes solely the property of the Commonwealth of Massachusetts, Cannabis Control Commission, which may use or modify it in any way.**
2. Support and train Program participants, who are individuals and business in areas of disproportionate impact by providing skills to address their disparities in life circumstances and improve their and their communities' quality of life, while improving the quality of life in areas of disproportionate impact. See the Commission's Guidance for Identifying Areas of Disproportionate Impact, available at <https://mass-cannabis-control.com/wp-content/uploads/2018/04/FINAL-DRAFT-Areas-of-Disproportionate-Impact-1.pdf>

Table A: Curriculum Tracks



	<b>Track 1: Entrepreneurial (13 courses)</b>	<b>Track 2: Core (11 courses)</b>	<b>Track 3: Entry/Re-entry (7 courses)</b>	<b>Track 4: Ancillary (8 courses)</b>
<b>Courses</b>	<b><u>Universal Courses Mandatory for Entrepreneur &amp; Core Tracks – Optionally Available to Entry &amp; Ancillary</u></b> Business Plan Creation Raising Capital Municipal Process HCA's Branding, Marketing, & Advertising Accounting & Taxes Agent Recruitment & Training			
	Retail Subtrack (6 Courses)	Management Opportunities & Business Compliance	Introduction to the Cannabis Plant & Entry Opportunities	Opportunities for Ancillary Businesses
	Cultivation Subtrack (6 Courses)	Restorative Justice in the Workplace	Restorative Justice & Re-Entering the Workforce	Starting an Ancillary Business & Compliance
	Product Manufacturing Subtrack (6 Courses)	Developing Equitable and Accessible  Work Teams	Technology and Financial Literacy	Universal Business Plan Creation
	Delivery Operator and Courier Subtrack (6 Courses)	Skills-Based Training: Cultivation		Facility Design for Ancillary Businesses
	1. Application & Licensing Process 2. Cannabis Business Compliance	Skills-based training: Retail and Delivery		Raising Capital for Ancillary Businesses

3. Facility Design & Real Estate 4. Security and Working with Law Enforcement 5. Testing Process 6. Post-Licensure Operations	Skills-based training: Product Manufacturing	Accounting & Taxes for Ancillary Businesses
	Skills-based training: Testing	Sustaining Operations
	Resume & Interview Prep for Cannabis Careers	

### Course Descriptions and Learning Objectives:

**Accounting & Taxes for Cannabis Businesses [Universal Course]:** Course will provide a comprehensive overview and breakdown of accounting, tax law compliance and guidelines. Course will also have a focus on 26 U.S.C. § 280E.

**Learning Objectives:** Participants will understand tax compliance, practices, violations, projections and documentation associated with a cannabis business. Participants will understand procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8) (9). Participants will draft a written recordkeeping operating procedure and checklist of required tax documents and next steps.

**Accounting & Taxes for Ancillary Businesses [Ancillary Track]:** Course provides a comprehensive overview and breakdown of accounting, tax law compliance, and guidelines for businesses generally and as may intersect with cannabis businesses, in Massachusetts.

**Learning Objectives:** Participants will understand tax compliance, practices, violations, projections, and documentation associated with owning a business. Participants will understand procedures to ensure accurate recordkeeping, including inventory protocols in compliance with state law.



**Agent Recruitment & Training [Universal Course]:** Course will provide a comprehensive overview of how to recruit, register and train Marijuana Establishment agents per 935 CMR 500.029 through 935 CMR 500.033.

**Learning Objectives:** Participants will understand the registration process of Marijuana Establishment agents as well as denial, revocation, and voidance of registration cards per regulations. Participants will also develop a recruitment plan with a focus on equity and the inclusion of Black, African American, Latinx, and Indigenous people of color, women, veterans, farmers, people with disabilities, and individuals regardless of sexual orientation or gender expression. Participants will understand qualifications and required training(s) for Marijuana Establishment agents.

**Ancillary Facility Design [Ancillary Track]:** Course will provide an introductory overview of business facility design and regulations per Massachusetts law. Course will also provide an overview of identifying and securing a suitable location for an ancillary business.

**Learning Objectives:** Participants will understand general business design and regulations and will develop a model design, design checklist, and framework of next steps. Participants will also understand how to identify a suitable location and the process involved in securing a location.

**Application & Licensing Process [Entrepreneur Track: Cultivation Subtrack]:** Course will provide a comprehensive overview and breakdown of the cultivation licensing application process, requirements per 935 CMR 500.101 through 935 CMR 500.104, and general requirements in 935 CMR 500.105(1). Course will also provide an overview of the difference between the state and local components and built in time for group application walk-through. Four Trees will endeavor to be available for one-on-one application walk-through based on participant interest and need.

**Learning Objectives:** Participants will receive hands on group application walkthrough to not only understand the licensing application process but also how to successfully apply, the difference between state and local components of the process, and application guidelines specific to their cultivation license types. Participants will use a Commission-tailored checklist of next steps and required documentation.

**Application & Licensing Process [Entrepreneur Track: Delivery Subtrack]:** Course will provide a comprehensive overview and breakdown of the Delivery Courier and Delivery Operator licensing application process, requirements per 935 CMR 500.101 through 935 CMR 500.146, and general requirements in 935 CMR 500.105(1). Course will also provide an overview of the difference between the state and local components and built-in time for group application walk-through.

**Learning Objectives:** Participants will receive hands on group application walkthrough to not only understand the licensing application process but also how to successfully apply, the difference between



state and local components of the process, and application guidelines specific to their delivery license types. Participants will use a Commission-tailored checklist of next steps and required documentation.

**Application & Licensing Process [Entrepreneur Track: Product Manufacturing Subtrack]:** Course will provide a comprehensive overview and breakdown of the licensing application process, requirements per 935 CMR 500.101 through 935 CMR 500.104, and general requirements in 935 CMR 500.105(1). Course will also provide an overview of the difference between the state and local components and built-in time for one-on-one application walk-through. Vendor will endeavor to be available for one-on-one application walk-through based on participant interest and need. Where Vendor is unable to meet the demand for one-on-one sessions, Vendor will work with the Commission's Project Manager to seek an agreed upon solution.

**Learning Objectives:** Participants will receive hands on, group and one-on-one application walkthrough to not only understand the licensing application process but also how to successfully apply, the difference between state and local components of the process, and application guidelines specific to their product manufacturing or retail license types. Participants will use a Commission-tailored checklist of next steps and required documentation.

**Application & Licensing Process [Entrepreneur Track: Retail Subtrack]:** Course will provide a comprehensive overview and breakdown of the licensing application process, requirements per 935 CMR 500.101 through 935 CMR 500.104, and general requirements in 935 CMR 500.105(1). Course will also provide an overview of the difference between the state and local components and built in time for one-on-one application walk-through. Vendor will endeavor to be available for one-on-one application walk-through based on participant interest and need. Where Vendor is unable to meet the demand for one-on-one sessions, Vendor will work with the Commission's Project Manager to seek an agreed upon solution.

**Learning Objectives:** Participants will receive hands on, group and one-on-one application walkthrough to not only understand the licensing application process but also how to successfully apply, the difference between state and local components of the process, and application guidelines specific to their product manufacturing or retail license types. Participants will use a Commission-tailored checklist of next steps and required documentation.

**Business Plan Creation & Development [Universal Course]:** Course will provide a comprehensive overview on how to create and develop a working business plan and cost analysis. Course will provide built in group application walk-through. Vendor will endeavor to be available for one-on-one application walk-through based on participant interest and need. Where Vendor is unable to meet the demand for one-on-one sessions, Vendor will work with the Commission's Project Manager to seek an agreed upon solution.



Learning Objectives: Participants will develop a fluid draft of their business vision, plan and cost analysis, with checklist and framework of next steps. Participants will know how to apply their business plan and use it to prepare for marketing and fundraising.

**Branding, Marketing & Advertising [Ancillary Track]:** Course will provide a comprehensive overview of how to brand, market and advertise a business outside the context of a cannabis business, per Massachusetts law.

Learning Objectives: Participants will have a clear understanding of permitted and prohibited branding, marketing and advertising requirements. Participants will develop branding, marketing and advertising strategy and checklist for next steps.

**Branding, Marketing & Advertising [Universal Course]:** Course will provide a comprehensive overview of how to brand, market and advertise a cannabis business as well as labeling and packaging design of marijuana and marijuana products per 935 CMR 500.105(4) through (7).

Learning Objectives: Participants will have a clear understanding of permitted and prohibited branding, marketing and advertising requirements. Participants will also understand labeling and packaging design limitations and will develop a branding, marketing and advertising strategy and checklist for next steps.

**Cannabis Business Compliance [Entrepreneur Track: Cultivation Subtrack]:** Course will provide a comprehensive overview of compliance and its guidelines regarding all aspects of owning and running a cultivation business.

Learning Objectives: Participants should have a clear understanding of general compliance and compliance protocols specific to cultivation facilities. Participants will develop a general compliance checklist and framework.

**Cannabis Business Compliance [Entrepreneur Track: Delivery Subtrack]:** Course will provide a comprehensive overview of compliance and its guidelines regarding all aspects of owning and running a Delivery Courier or Delivery Operator business.

Learning Objectives: Participants should have a clear understanding of general compliance and compliance protocols specific to delivery businesses. Participants will develop a general compliance checklist and framework.

**Cannabis Business Compliance [Entrepreneur Track: Product Manufacturing Subtrack]:**

Provide a comprehensive overview of compliance and its guidelines regarding all aspects of owning and running a Product Manufacturing Marijuana establishment.



Learning Objectives: Participants should have a clear understanding of general compliance and compliance protocols specific to product manufacturing facilities. Participants will develop a general compliance checklist and framework.

**Cannabis Business Compliance [Entrepreneur Track: Retail Subtrack]:**

Provide a comprehensive overview of compliance and its guidelines regarding all aspects of owning and running a Retail Marijuana establishment.

Learning Objectives: Participants should have a clear understanding of general compliance and compliance protocols specific to retail facilities. Participants will develop a general compliance checklist and framework.

**Developing Equitable and Accessible Work Teams [Universal Track & Core Track]:**

Provide in depth training on how to ensure teams are equitable, diverse, and accessible. Course should cover ADA regulations, developing reasonable accommodations, and recruiting from communities that have been disproportionately impacted.

Learning Objectives: Participants should have a deep understanding of equity and accessibility as well as its importance in the cannabis industry. Participants will develop strategic plans for equitable recruitment, ensuring accessible workplaces and facilities, and maintaining an equitable workplace both culturally and in policy.

**Facility Design [Entrepreneur Track: Cultivation Subtrack]:** Course will provide a comprehensive overview and breakdown of cannabis business facility design under the Commission's regulations and inform participants on how to navigate these requirements. Course will also provide an overview of identifying and securing a location for a cultivation facility.

Learning Objectives: Participants will grasp cannabis facility design and regulations and will develop a model design, design checklist, and framework of next steps. Participants will also understand how to identify and secure a location including the municipal process involved.

**Facility Design [Entrepreneur Track: Delivery Subtrack]:** Course will provide a comprehensive overview, breakdown, and comparison of cannabis business facility design and design regulations specific to Delivery Courier and Delivery Operator. Course will also provide an overview of identifying and securing a location for delivery licenses.



**Learning Objectives:** Participants will grasp cannabis facility design and regulations and will develop a model design, design checklist, and framework of next steps. Participants will also understand how to identify and secure a location including the municipal process involved.

**Facility Design [Entrepreneur Track: Product Manufacturing Subtrack]:** Course will provide a comprehensive overview and breakdown of cannabis business facility design and design regulations. Course will also provide an overview of identifying and securing a location for a product manufacturing facility.

**Learning Objectives:** Participants will grasp cannabis facility design and regulations and will develop a model design, design checklist, and framework of next steps. Participants will also understand how to identify and secure a location including the municipal process involved.

**Facility Design [Entrepreneur Track: Retail Subtrack]:** Course will provide a comprehensive overview and breakdown of cannabis business facility design and design regulations. Course will also provide an overview of identifying and securing a location for a retail facility.

**Learning Objectives:** Participants will grasp cannabis facility design and regulations and will develop a model design, design checklist, and framework of next steps. Participants will also understand how to identify and secure a location including the municipal process involved.

**Host Community Agreements (HCA's) [Universal Course]:** Course will provide a comprehensive overview on HCA's including negotiating and executing a legal agreement per Commission guidance, navigating the municipal process involved, and application documentation requirements per 935 CMR 500.101(a)(8).

**Learning Objectives:** Participants will understand the purpose of HCAs and how to negotiate and execute a reasonable agreement with the municipality.

**Intro to the Cannabis Plant & Entry Opportunities [Entry Track]:** Provide a comprehensive introduction of the cannabis plant, its uses, and the legal cannabis industry in Massachusetts. Course will also offer an introduction to the various entry level career pathways available in the cannabis industry.

**Learning Objectives:** Participants will have an understanding of the cannabis plant, its uses and how it is regulated. Participants will identify a skills-based path of focus for the remainder of the track.

**Management Opportunities [Core Track]:** Course will provide an introduction to possible career pathways in the cannabis industry including avenues in the medical, finance and accounting, compliance, marketing, information technology, communications and security aspects of the industry. The course will also offer a high-level overview of cannabis business compliance.



**Learning Objectives:** Participants will have a defined understanding of management level opportunities and compliance as it relates to those positions and cannabis businesses. Participants will identify what type of opportunities they are looking to pursue.

**Municipal Approval Process [Universal Course]:** Course will provide a comprehensive breakdown of the municipal process including the differences between municipality requirements, how the municipal process relates to the application for licensure at the state level, and the processes and municipal documentation required for community outreach meetings and the application for a marijuana establishment, per 935 CMR 500.101(a)(6)(7)(8)(9)(10).

**Learning Objectives:** Participants will understand the municipal process, documentation requirements, and how to navigate the process including bans, and zoning. Participants will develop a clear strategy for their community outreach meetings and next steps. Participants will be briefly introduced to Host Community Agreements (HCAs) requirements.

**Opportunities for Ancillary Businesses [Ancillary Track]:** Course will provide comprehensive overview of what ancillary businesses are, how general business principles intersect with the cannabis industry, and opportunities for ancillary businesses.

**Learning Objectives:** Participants will have a clearly defined understanding of ancillary businesses and opportunities for ancillary business. Participants will identify what type of ancillary business they are looking to pursue.

**Post Licensure Operations [Entrepreneur Track: Cultivation Subtrack]:** Course will provide a recap of the track a comprehensive and overview of buildout requirements and next steps in becoming an operational cannabis business under the Commission's Regulations. Course will also cover leadership rating program for Marijuana Establishments and marijuana-related businesses per 935 CMR 500.040.

**Learning Objectives:** Participants will develop checklist and sample timeline for achieving operation and prepare for facility inspection and compliance per 935 CMR 500.300. Participants will understand leadership ratings, how to achieve them and will revisit business plans and applications to finalize checklist and next steps lists. Participants will also develop a plan for communication with Vendor post-licensure as a method of ensuring comprehension and how the course materials may be applicable to sustaining operations.

**Post Licensure Operations [Entrepreneur Track: Delivery Subtrack]:** Course will provide a recap of the track a comprehensive and overview of buildout requirements and next steps in becoming an operational



cannabis delivery business under the Commission's Regulations. Course will also cover leadership rating program for Marijuana Establishments and marijuana-related businesses per 935 CMR 500.040.

**Learning Objectives:** Participants will develop checklist and sample timeline for achieving operation and prepare for facility inspection and compliance per 935 CMR 500.300. Participants will understand leadership ratings, how to achieve them and will revisit business plans and applications to finalize checklist and next steps lists. Participants will also develop a plan for communication with Vendor post-licensure as a method of ensuring comprehension and how the course materials may be applicable to sustaining operations.

**Post Licensure Operations:** [Entrepreneur Track: Product Manufacturing Subtrack]: Course will Provide a recap of the Entrepreneur track and a comprehensive overview of buildout requirements and next steps in becoming an operational cannabis business. Course will also cover the leadership rating program for Marijuana Establishments and marijuana-related businesses per 935 CMR 500.040.

**Learning Objectives:** Participants will develop checklist and proposed timeline for achieving operation and prepare for facility inspection and compliance per 935 CMR 500.300. Participants will understand leadership ratings, how to achieve them and will revisit business plans and applications to finalize checklist and next steps lists. Participants will also develop a plan for communication with vendors post-licensure as a method of sustaining operations.

**Post Licensure Operations:** [Entrepreneur Track: Retail Subtrack]: Course will Provide a recap of the Entrepreneur track and a comprehensive overview of buildout requirements and next steps in becoming an operational cannabis business. Course will also cover the leadership rating program for Marijuana Establishments and marijuana-related businesses per 935 CMR 500.040.

**Learning Objectives:** Participants will develop checklist and proposed timeline for achieving operation and prepare for facility inspection and compliance per 935 CMR 500.300. Participants will understand leadership ratings, how to achieve them and will revisit business plans and applications to finalize checklist and next steps lists. Participants will also develop a plan for communication with vendors post-licensure as a method of sustaining operations.

**Raising Capital for Ancillary Businesses** [Ancillary Track]: Course will teach participants how to use their created cost analysis and budget to identify how to raise capital, create fundraising campaigns and identify and connect with investors. Course will also provide overview of challenges raising capital in the industry.

**Learning Objectives:** Participants will develop a plan to raise capital and have a list of clearly defined fundraising options, investment types, and how to develop investor connections.





**Raising Capital in the Cannabis Industry [Universal Course]:** Course will teach participants avenues of raising capital, investment types and how to identify, connect with, and pitch to investors. Course will also provide insight into the challenges of raising capital, predatory practices, and navigating the industry due to federal illegality.

**Learning Objectives:** Participants will develop a plan to raise capital and understand different fundraising options, investment types, and predatory practices. Participants will also create & practice their pitches. Vendor will provide a panel discussion with investors that provides (i) insights as to investor concerns and (ii) an opportunity for networking with participants.

**Resume & Interview Prep for Cannabis Careers [Core and Entry Track]:** Course will provide a detailed guide for effectively creating or tailoring your resume and preparing for interviews in the cannabis industry.

**Learning Objectives:** Participants will have a developed resume, tailored to the cannabis industry, showcasing their unique value in language specific to the cannabis industry. Participants will understand best interview practices and participate in mock interviews.

**Restorative Justice and Re-Entering the Workforce [Re-Entry/Entry Track]:** Course will provide an in-depth training on restorative justice and how to utilize restorative justice practices when re-entering the workforce.

**Learning Objectives:** Participants will understand the purpose and function of restorative justice, how to utilize restorative justice practices, and a clear understanding of how to manage the challenges of re-entering the workforce following incarceration. Participants will develop tools and strategies for productive conflict management, self-advocacy, and obtaining a job.

**Restorative Justice in the Work Place [Core Track]:** Course will provide an in-depth training on restorative justice and how to incorporate restorative justice into the work place.

**Learning Objectives:** Participants will understand the purpose and function of restorative justice, how to hold restorative justice circles, and how to implement restorative justice practices in the workplace. Participants will have the opportunity to practice leading restorative justice circles in live sessions.

**Security & Working w/ Law Enforcement [Entrepreneur Track: Cultivation Subtrack]:** Course will provide a comprehensive overview of security requirements per 935 CMR 500.110 and intersections with law enforcement. Course will also cover relationship building with law enforcement.

**Learning Objectives:** Participants will understand all security requirements for cultivation facilities including buffer zones, limited access areas, incident reporting and security audits. Participants will develop sufficient safety measures to deter and prevent unauthorized entrance into areas containing





marijuana and theft of marijuana at the Marijuana Establishment. Participants will also develop strategies for establishing positive relationships with law enforcement in the municipality in which the Marijuana Establishment is or will be located.

**Security & Working w/ Law Enforcement [Entrepreneur Track: Delivery Subtrack]:** Course will provide a comprehensive overview of security requirements per 935 CMR 500.110 through 935 CMR 500.146 and intersections with law enforcement. Course will also cover relationship building with law enforcement.

**Learning Objectives:** Participants will understand all security requirements for Delivery Courier and Delivery Operator License types including vehicle requirements, agent training, bodycam requirements, incident reporting and security audits. Participants will develop sufficient safety measures to deter and prevent unauthorized entrance into areas containing marijuana and theft of marijuana from delivery drivers or warehousing facilities. Participants will also develop strategies for establishing positive relationships with law enforcement in the municipality in which the Marijuana Establishment is or will be located.

**Security & Working with Law Enforcement [Entrepreneur Track: Product Manufacturing Subtrack]:** Course will provide a comprehensive overview of security requirements per 935 CMR 500.110 and intersections with law enforcement. Course will also dive into relationship building with law enforcement.

**Learning Objectives:** Participants will understand all security requirements for product manufacturing facilities including buffer zones, limited access areas, incident reporting and security audits. Participants will develop sufficient safety measures to deter and prevent unauthorized entrance into areas containing marijuana and theft of marijuana at the Marijuana Establishment. Participants will also develop strategies for establishing positive relationships with law enforcement in the municipality in which the Marijuana Establishment is or will be located.

**Security & Working with Law Enforcement [Entrepreneur Track: Retail Subtrack]:** Course will provide a comprehensive overview of security requirements per 935 CMR 500.110 and intersections with law enforcement. Course will also dive into relationship building with law enforcement.

**Learning Objectives:** Participants will understand all security requirements for retail facilities including buffer zones, limited access areas, incident reporting and security audits. Participants will develop sufficient safety measures to deter and prevent unauthorized entrance into areas containing marijuana and theft of marijuana at the Marijuana Establishment. Participants will also develop strategies for establishing positive relationships with law enforcement in the municipality in which the Marijuana Establishment is or will be located.



**Skills-Based Trainings: Cultivation [Entry & Core Track]:** Course will provide a comprehensive overview of cultivation establishments, regulations and employment opportunities in cultivation. Course will also offer hands-on guidance and skills-based trainings for specific job positions.

**Learning Objectives:** Participants will receive skills-based training to obtain entry-level positions within cultivation facilities. Participants should have adequate training to secure positions regardless of cultivation style or canopy size.

Examples of job and skill types may include:

- Trimmer Assistant
- Cultivation Site Worker
- Driver / Transporter, in accordance with 935 CMR 500.105(13)

**Skills-Based Training: Product Manufacturing [Entry & Core Track]:** Course will provide a comprehensive overview of product manufacturing establishments, regulations and employment opportunities in product manufacturing. Course will also offer hands-on guidance and skills-based trainings for specific job positions.

**Learning Objectives:** Participants will have received and mastered skills to obtain entry-level positions within product manufacturing facilities.

\*Vendors will only provide skills-based training based on applicant interest.  
All skill-based trainings are merged courses.

**Skills-Based Training: Retail [Entry & Core Track]:** Course provide a comprehensive overview of retail establishments, regulations, and employment opportunities within the cannabis industry. Course will also offer hands-on guidance and skills-based trainings to secure entry level retail positions.

**Learning Objectives:** Participants will understand entry level career pathways and receive skills-based training to obtain entry-level positions within retail facilities.

\*Vendors will only provide skills-based training based on applicant interest.  
All skill-based trainings are merged courses.

**Skills-Based Training: Testing [Entry & Core Track]:** Course provide a comprehensive overview of testing establishments, regulations, and employment opportunities within the cannabis industry. Course will also offer hands-on guidance and skills-based trainings to secure entry level testing positions.

**Learning Objectives:** Participants will understand entry level career pathways and receive skills-based training to obtain entry-level positions within testing facilities.

\*Vendors will only provide skills-based training based on applicant interest.



All skill-based trainings are merged courses.

**Starting an Ancillary Business & Compliance [Ancillary Track]:** Course will provide a comprehensive overview of starting and operating ancillary businesses as well as general business compliance per Massachusetts state law.

**Learning Objectives:** Participants will understand the steps to form and register their entities and guidance on how their businesses may be compliant when intersecting with the cannabis industry

**Sustaining Operations [Ancillary Track]:** Course will provide a comprehensive overview of how to brand, market and advertise a business, not a cannabis business, per Massachusetts law.

**Learning Objectives:** Participants will develop a checklist and proposed timeline for achieving operation. Participants will revisit their business plan and finalize checklist and next steps lists.

**Technology and Financial Literacy [Re-Entry/Entry Track]:** Course will provide a comprehensive overview of the technology and financial literacy to ensure success in the cannabis industry.

**Learning Objectives:** Participants will receive hand-on training with the associated technology platforms commonly utilized in the cannabis industry (METRC, MassCIP, POS systems, etc.). Participants will have a clear understanding of basic financial literacy and its role in entry-level positions (bookkeeping, cash handling, inventory, etc.) .

**Testing Process [Entrepreneur Track: Cultivation Subtrack]:** Course will provide a comprehensive overview of laboratory testing process per 935 CMR 500.160, the investigative testing process per 935 CMR 500.301, and procedures for quality control and testing of product for potential contaminants

**Learning Objectives:** Participants will have a clear understanding of the testing process and will develop an operating procedure for quality control and testing of product for potential contaminants. Participants will understand the investigative process or secret shopper program.

**Testing Process [Entrepreneur Track: Delivery Subtrack]:** Course will provide a comprehensive overview of laboratory testing process per 935 CMR 500.160, the investigative testing process per 935 CMR 500.301, and procedures for quality control and testing of product for potential contaminants

**Learning Objectives:** Participants will have a clear understanding of the testing process and will develop an operating procedure for quality control and testing of product for potential contaminants. Participants will understand the investigative process or secret shopper program.

**Testing Process: [Entrepreneur Track: Product Manufacturing Subtrack]:** Course will provide a



comprehensive overview of laboratory testing process per 935 CMR 500.160, the investigative testing process per 935 CMR 500.301, and procedures for quality control and testing of product for potential contaminants.

Learning Objectives: Participants will have a clear understanding of the testing process and will develop an operating procedure for quality control and testing of product for potential contaminants. Participants will understand the investigative process or secret shopper program.

**Testing Process:** [Entrepreneur Track: Retail]: Course will provide a comprehensive overview of laboratory testing process per 935 CMR 500.160, the investigative testing process per 935 CMR 500.301, and procedures for quality control and testing of product for potential contaminants.

Learning Objectives: Participants will have a clear understanding of the testing process and will develop an operating procedure for quality control and testing of product for potential contaminants. Participants will understand the investigative process or secret shopper program.

### **3.2.2 Training & training materials**

In recognition of the increasing diversity of platforms on which consumers get information, the Commission requires that any produced video messages can be syndicated through a variety of platforms including, but not limited to, traditional broadcast television, local cable access, YouTube, and other social media and web-based platforms. All formats must meet state accessibility requirements for the sight and hearing impaired, including closed captioning, alternate file formats accessible by screen readers, content transcripts, and other requirements as provided by the Commission.

The Commission will own and distribute all materials through its websites and our existing social media accounts. All materials will also be made available to local municipalities and programs across the Commonwealth to distribute to their residents via their communications channels.

- Vendors must supply their own printed material and other supplies for each training, as applicable.
- Vendors must arrange technology resources for each training but may use Commission technology if the Commission agrees to such accommodations.
- Vendors must provide for all their own travel expenses.

### **3.3 Complete Response**

A complete response must be submitted in the following format:

- Proposal must adhere to the page limits described below (excluding required forms, tables listing client references and résumés, which may be attached as exhibits).
- Each copy should be labeled with the name of the response document it contains.



- The sections of the response documents should be identified by either a separator page to match the order and names of the sections listed in the checklist below.
- Complete Response Checklist (please structure your response in the same order listed) and should not exceed 12 pages;
  - Cover Letter (see below);
  - Vendor Qualifications (see Section 3.1 of this RFR, including narrative response);
  - Programmatic Response (see below for further details);
  - Supplier Diversity Plan Form #1 - SDP Plan Commitment, *available at* <https://www.mass.gov/lists/sdo-forms>, see Sections 9 (Appendix 2) and 10.5 (Appendix 3) of this RFR.
  - Proposed Prompt Payment Discount Form (PPD) or indication that Vendor will agree to the 45-day payment cycle, see Sections 9 (Appendix 2) and 10.6 (Appendix 3) of this RFR
  - Business Reference Form, see Section 10.7 (Appendix 3) of this RFR

Please note that it is the Commission's policy not to enter into end-user agreements. Any such agreement and the necessity of that agreement must be identified as part of the Vendor's response or it will not be considered.

**COVER LETTER:** A cover letter that clearly states the name of the Vendor organization, principal address, local (greater Boston) address (if applicable, and if different from principal address), website (if applicable), and the name, address, email, fax and telephone number of the Vendor's primary contact person. The letter must:

- Provide an executive summary of the Vendor's proposal, which identifies the services to be provided;
- Identify the name, title, address, phone number, and email address of the individual serving as the Vendor's primary contact;
- Be signed by an individual authorized to bind the Vendor;
- Clearly commit the key personnel for a minimum of six (6) months from the response due date and describe the way subsequent staff or assignments will be made to ensure continuity;
- Clearly identify any significant subcontractors, their roles, and responsibilities for a minimum of six (6) months from the response due date and describe the way subsequent subcontract assignments will be made to ensure continuity;
- Define "social equity" and demonstrate an understanding of the Commission's equity provisions; and
- Include a statement that the Vendor's proposal will remain in effect for at least 120 days or until a contract resulting from this RFR is executed, whichever is earlier.

Unnecessary attachments or other documents not specifically asked for should not be submitted.

**PROGRAMMATIC RESPONSE AND EVALUATION COMPONENTS:** As part of its programmatic response, the Vendor shall describe its approach and plans for accomplishing the work outlined in Section



3 of this RFR. The Vendor must set forth its understanding of the requirements of this RFR and its ability to successfully complete a contract. The following components will be some of the criteria considered by the Commission when evaluating each Quote.

Responses will be reviewed and evaluated according to the criteria set by the Commission, adherence to the submission requirements, experience working with impacted communities, proven ability to develop and deliver effective training and technical assistance services, and proven commitment to social equity.

#### 1. Vendor Structure

The Vendor shall provide a brief description of business organization, including its organizational structure, its scope of business, its internal organization, number of personnel, and relationship with subcontractors.

#### 2. Strategic Approach

The Vendor shall set forth its overall strategic approach and plans to meet the requirements of the RFR in a narrative format. This narrative should convince the Commission that the Vendor understands the objectives that a contract is intended to meet, the nature of the required work, and the level of effort necessary to successfully complete a contract. It should convey that the Vendor's detailed plans and approach proposed to complete the Scope of Services are realistic, attainable and appropriate and that the Vendor's proposal will lead to successful contract completion. Mere reiterations of RFR tasks and subtasks are strongly discouraged, as they do not provide insight into the Vendor's qualifications and capacities to complete a contract.

Vendors will differentiate themselves by demonstrating to the Commission that the Vendor understands the cannabis industry as well as social equity, and has an approach, contacts and experience providing comparable services in the industry or a related industry.

- a. Required elements of response include rates, budget and deliverables.

Describe your past and present experience developing and implementing curricula in any of the areas listed. Please be encouraged to identify all areas of expertise. Specify if this experience is directly tied to the marijuana industry. (10 points)

- Accounting and sales forecasting.
- Business plan creation and operational development.
- Farming best practices.
- Identifying/raising funds or capital.
- Management, recruitment, and employee trainings.
- Marijuana industry best practices.
- Navigating licensing/certification processes.



- Navigation of municipal processes.
- Tax prediction and legal compliance.
- Understanding and navigating law.
- Skills-based training
- Restorative Justice and Re-Entering the Workforce
- Educating and De-stigmatizing cannabis in communities across the Commonwealth
- Required Technology and Financial Literacy
- Science behind Cannabis and physiological impacts
- Investigation Compliance
- Other - Provide details, specify how this would be transferable to the marijuana industry.

Detail your course curriculum framework. (20 points)

- Specify how long the development of the course will take, overall duration of the curriculum broken down in terms of number of sessions, teaching hours, months and/or years and the number of courses necessary to adequately train a participant. (Specify if you are able to provide alternative time frames).
- Specify the content to be learned in clear, definable standards of what the applicant should know and be able to do once the program concludes.
- Describe how the curriculum is related or transferable to the marijuana industry.
- Describe the location and area of your training site or your plan to procure space and appropriate equipment. Detail any spacing and equipment needs or limitations. (state-wide)

Describe your experience working specifically with Black, African American, Latinx, Asian and Pacific Islander, and Indigenous people of color, veterans, women, LGBTQ+ people, farmers, people with disabilities, or other disproportionately impacted communities. (15 points)

Describe experience developing effective digital content designed to reach various target audiences. (5 points)

Supplier Diversity Plan Form #1 - SDP Plan Commitment (15 points)

### **Vendor Attachment A - PAST & PRESENT EXPERIENCE**

Provide between 3 to 5 examples of your experience with providing trainings and/or technical assistance in the areas of: management, recruitment, and employee trainings; accounting and sales forecasting; tax prediction and legal compliance; business plan creation and operational development; marijuana industry best practices; identifying/raising funds or capital; navigating licensing/certification processes; farming best practices; navigation of municipal processes; and understanding and navigating law. Examples must be able to be reviewed in under 10 minutes. Should include an organized summary of previous courses and evaluations (please do not include raw scores). (10 points)



### **Vendor Attachment B – KEY & BACKUP STAFF & KEY RELATIONSHIPS**

As described below, identify the manager and any other key staff who will routinely work with applicants. Briefly describe the relevant experience of each of those individuals. This relevant experience should include previous work experience with communities disproportionately impacted by the War on Drugs, specifically Black, African American, Latinx, and Indigenous communities. Additionally, include any relevant degrees/certificates/licenses, and relevant SEP status. Describe your plan to obtain additional staff members if needed and whether you will be relying on subcontractors. Please explain what qualities and qualifications you will look for in your search for additional staff members. (10 points)

### **Vendor Attachment C - TIMELINE**

Present a timeline to meet the deliverables in the scope of service. Include adequate time for the Cannabis Control Commission to approval of the initial concepts; initial draft and design samples; and final products. (5 points)

### **Vendor Attachment D – BUDGET (COST RESPONSE)**

Provide a rate-based budget for: 1) the development of each course type; and 2) the delivery of the first live session of each course. The budget shall be inclusive of all personnel time; materials, including copying and printing; travel; communication; project management; overhead costs; overtime including weekends and holidays; and any and all other ancillary costs and charges. All negotiated rates specified are to be firm and fixed throughout the term of a contract and any related extensions.

The Commission anticipates that Vendors will be compensated an estimated amount of \$5,000 - \$10,000 per course, inclusive of all of the expenses listed above and of both deliverables. It would be helpful to the Commission for Vendors to work within this range when providing their cost responses.

As set forth in the Commonwealth Standard Contract Form, any and all payments are subject to appropriation.

(5 points)

### **Vendor Attachment F – REFERENCES**

The Vendor shall provide references from at least three (3) organizations for which the Vendor has provided services similar to the work contemplated by this RFR. Vendors are required to use the Business Reference Form posted along with this procurement on COMMBUYS.





Responses must be limited to 5 narrative pages plus requested appendices. Narrative should use 12-point font and have 1-inch page margins. The appendices should each be submitted as a Word document, PDF or excel sheet with the appendices clearly numbered and marked in the title of the documents. Each answer should be numbered, because each question will be rated separately, unless the reader is referred to another specific answer. Electronic media should be able to be easily accessed. (5 points)

**Vendor Attachment G** - Understanding of current ADA regulations and how it applies to ADA regulations in the Vendor's business. (5 points)

For evaluation purposes, there are a total of 100 points distributed throughout the above mentioned criteria. Per the requirements for this procurement, the SDP Plan must be evaluated at 10% or more of the total evaluation.

### **3.4 Compensation Structure/Pricing**

This will be a rate contract. Compensation will be project based; and payment will be a deliverable-based rate structure, based on the following deliverables:

#### **DELIVERABLE PART 1: Curriculum Development:**

- Curriculum development designed to inform the different pathways to entry into the cannabis industry.
- Development of learning materials that adhere to ADA guidelines and Section 508 regulations, state accessibility requirements for the sight and hearing impaired, and other requirements as provided by the Commission.
- Coursework delivery in online learning management system.
- Development of collateral materials for use in Commission promotional materials as well as dissemination through community partners.

#### **DELIVERABLE PART 2: Training & Technical Assistance Services:**

- Placement and monitoring of applicants in trainings, technical assistance, and/or mentoring.
- Conducting trainings and implementing course curriculum virtually and if possible, in-person. All trainings should be recorded with closed captioning and be made accessible to all participants in the online learning management system.
- Reporting on effectiveness of each element and plans for adjusting as needed to ensure the most effective teaching methods for all learners are being utilized.
- Developing recommendations for future phases and iterations of the program.
- Developing and/or revising trainings for additional audiences and marijuana-related issues.
- Developing and collecting evaluations from Program participants from each course – mid course and end of course.



Payments will be based on completion of Deliverable Part 2.

Please note that for compensation purposes, a course with the same name and or/description appearing under multiple tracks will be treated as separate and distinct courses under each track.

This compensation structure is subject to change pursuant to the needs of the Commission.

Invoice and Payment Specifications. The Commission will not make payment in advance, make a deposit nor make payment on delivery. Vendors must submit an itemized invoice and other documents as negotiated by the 15th of the month after services have been rendered, indicating the date, description and charges. Guidance regarding payment and billing will be discussed during contract negotiations. By default, in compliance with state finance law, the Commission adheres to a 45-day payment schedule unless the Vendor agrees to a prompt payment discount schedule and terms. The Commission is a tax-exempt entity and will provide a copy of the ST-2 tax form for each awarded Vendor to keep on file. See also Section 8.2.1 of this RFR.

Costs. Costs which are not specifically identified in the Vendor's response, and accepted by the Commission as part of the contract, will not be compensated under any contract awarded pursuant to this RFR. The Commonwealth will not be responsible for any costs or expenses incurred by Vendors responding to this RFR.

Reservation of Rights. This RFR does not commit the Commission to award any contracts, or to purchase any services if contracts are awarded. The Commission reserves the right to accept or reject any and all submissions received as a result of this RFR, to negotiate with any or all bidders and bidders selected that are determined qualified, and to cancel in part or in its entirety the RFR if it is in the best interest of the Commonwealth to do so. The Commission reserves the right to make contract changes and/or amendments during the term of the procurement as a result of contract monitoring and evaluation.

## **4 OTHER TERMS**

### **4.1 Continued qualification based on performance**

Performance Requirements: The Commission is endeavoring to deliver the best value to facilitate our needs. However, it is important to measure the Vendor's performance to ensure the engagement is compliant with what has been requested and what the Vendor has offered in this RFR. The following performance areas will be subject to measurement:

- Timely delivery (commodities, services, reports, billing, etc.)
- Responsiveness to commission Inquiries



- Quality of deliverables (commodities, adherence to ADA and Section 508 regulations, reports, etc.)
- Implementation of feedback from Commission staff
- Performance targets/benchmarks (quantities, outcomes, etc.)
- Attendance at scheduled meetings
- Adherence to policies and procedures of the Commission
- Engagement Performance Monitoring: To ensure performance monitoring, the selected vendor(s) will be required to update the Commission on progress toward the goals of the engagement by submitting training evaluations from participants with timely communication, which can be by email, telephone, or in-person meetings.
  - Contractors will maintain a consistent aggregated participant rating score using a 1-5 point Rensis Likert scale of 3.75 or greater sample evaluation ([Attachment X](#)). Two scores below 3.75 within a contract year will require a formal performance discussion with the Commission's Project Manager.
  - Commission staff will conduct routine evaluations using in-person observations of a contract trainer to assess their delivery method, as well as the quality, applicability, and effectiveness of the curriculum/content.
  - Evaluation will consist of instructor evaluations, course evaluation, and use of technology.
  - Instructors evaluation will include teaching methods, demonstrated expertise of knowledge, engagement with participants, cultural competency, demonstrated understanding of social equity, etc.
  - Course evaluation will include accessibility of content, application of course goals and objectives, participant engagement, and content delivery, etc.
  - Technology evaluation will include effective use of technology features within various online learning management systems, distribution of materials, accessibility of webinars/live sessions, etc.

## **4.2 Reporting**

Vendors are responsible for compliance with all other contract reporting requirements including, but not limited to, Supplier Diversity Program (SDP) and other contract reports, as required by Master Agreement.

## **4.3 Security and confidentiality**

The Vendor shall comply fully with all security procedures of the Commonwealth and Commonwealth Agencies in performance of the Contract. The Vendor shall not divulge to third parties any confidential information obtained by the Vendor or its agents, distributors, resellers, subcontractors, officers or



employees in the course of performing Contract work, including, but not limited to, security procedures, business operations information, personally identifiable information, or commercial proprietary information in the possession of the Commission.

#### **4.4 Alternatives**

Vendors may propose alternatives for equivalent, better or more cost effective performance than specified under the Vendor's original Quote at any time during the life of the Contract.

#### **4.5 Failure to perform contractual obligations as outlined in the Standard Contract Form, Terms and Conditions, and RFR may result in the following:**

Termination;  
Suspension;  
Adding additional contractors;  
Cover/Replacement Costs; or  
Liquidated Damages.

#### **4.6 Confidentiality**

Vendors shall demonstrate that they can comply with all state and federal laws and regulations relating to confidentiality and privacy, and security of personal information, including but not limited to G.L. c. 93H, G.L. c. 66A, and associated regulations.

#### **4.7 Closing Date**

Responses received after the response due date and time specified this RFR will be rejected. Due to statutorily imposed timelines, requests for extensions of time for submitting responses cannot be granted. All responses become the property of the Commonwealth of Massachusetts.

#### **4.8 Response Duration**

The Vendor's response shall remain in effect until any contract with the Vendor is executed or the Vendor withdraws its proposal.

#### **4.9 Acceptance of Response Content**

The entire contents of the Vendor's response shall be binding on the Vendor. The specifications and contents of a successful Vendor's response may be incorporated into a contract.



#### **4.10 Option to Modify Scope of Work**

The Commission reserves the right, at its sole discretion and at any time after release of the RFR and during to modify, increase, reduce or terminate any requirements of the procurement, whenever Commission deems necessary or reasonable to reflect any change in policy or program goals.

Commission additionally reserves the right, at its sole discretion and at any time after release of the RFR and to amend the procurement to implement state or federal statutory or regulatory requirements, judicial orders, settlement agreements, or any state or federal initiatives or changes affecting Commission. In the event of a change in the scope of work, Commission will provide written notice to the Vendor and will initiate negotiations with the Vendor.

#### **4.11 Authorizations and Appropriations**

Any contract awarded under this RFR is subject to all necessary federal and state approvals, as applicable, and is subject to appropriation of sufficient funding as determined by Commission.

#### **4.12 Template Statement of Work**

If awarded a contract under this RFR, Vendor shall execute a statement of work (**SOW**), similar to the template attached hereto as Appendix 5, which may be modified at the sole discretion of the Commission.

If awarded a contract under this RFR, Vendor shall execute with each member of Key Personnel (as defined in the SOW) an Intellectual Property and Work Effort Agreement, similar to the template attached hereto as Appendix 6. As part of its response, Vendor should identify terms of such SOW that might prevent it from contracting with the Commission or would otherwise make providing the services unpracticable.

### **5 AUDIT**

During the term of this Agreement and for a period of six years thereafter, the Commission, its auditors, the Operational Services Division, the Office of the Inspector General or other authorized representatives shall be afforded access at reasonable times to Vendor's accounting records, including sales information on any system, reports or files, in order to audit all records relating to goods sold or services performed pursuant to this Agreement. If such an audit indicates that Vendor has materially overcharged the Commission, then the Vendor shall remit the overcharged amount and be responsible for payment of any costs associated with the audit.

### **6 EVALUATION CRITERIA**



Vendor scores will be used to rank Vendors and will determine which Vendors will proceed to subsequent stages of the evaluation and/or enter into negotiations with the Commonwealth to receive a Contract award.

#### Evaluation Process:

The RFR Evaluation Process will be conducted in three phases. Staff and designated Commissioners at the Commission will conduct this portion of the review.

Phase I Review will be conducted for all proposal submissions. The purpose of the Phase I Review is to eliminate any bids that are nonresponsive to the requirements of the RFR. Bids that are deemed to be qualified based on the Phase I Review will be submitted to the Procurement Management Team (PMT) for additional review (Phase II Review). The PMT will make a recommendation to the Commissioners who will then accept or reject the recommendation of the PMT. (Phase I through Phase III of this RFR will be evaluated separately).

The Commission reserves the right to waive or permit cure of non-material errors or omissions and to take any other measures with respect to this RFR in any manner necessary to serve the best interests of the Commission and its staff.

1. Phase I Review: Vendors' responses will be reviewed based on listed criteria and completeness of response including mandatory attachments and compliance to submission criteria. Bids that do not comply with these components may be rejected and not proceed to Phase II Review.
2. Phase II Review (Total 100 points – see Section 3.3 above): Qualified bids, based on the Phase I Review, will be considered for additional review in Phase II. Scoring criteria for the evaluation of proposals was established above.

Prior to contracting with a Vendor, the Commission reserves the right to request a “Best and Final Offer” (**BAFO**) from some or all the Vendors.

#### Oral Presentations/Interviews.

After completion of Phase I and Phase II but prior to Phase III, the PMT shall have the option to invite all or some Vendors to make oral presentations/come in for interviews. Vendors will not be informed of their rank at the time of the oral presentation/interview. Additionally, the PMT reserves the right to adjust any Phase II score following any oral presentation/interview, and before proceeding on to Phase III.

The time allotments and the format shall be the same for all oral presentations/ interviews. The PMT will give the Vendor reasonable notice regarding the date of an oral presentation. The PMT may require the Vendors assign key personnel to conduct the oral presentation/interview.



A Vendor is limited to the presentation of material contained in its proposal, with the limited exception that a Vendor may address specific questions posed by the PMT or provide clarification of information contained in its proposal. A Vendor's failure to agree to an oral presentation/interview may result in disqualification from further consideration.

### Recommendation for Qualification

After the Commission evaluation team completes its evaluation, comparison and ranking of all proposals, and, if applicable, interview(s) and BAFO, it may recommend to Commission a Vendor or Vendors with which to designate as qualified. The decision shall be based on the team's recommendation and on the best interests of the Commonwealth.

## **6.1 Alternatives**

A Quote which fails to meet any material term or condition of the Bid, including the submission of required attachments, may lose points or be deemed unresponsive and disqualified. Unless otherwise specified, Vendors may submit Quotes proposing alternatives which provide equivalent, better or more cost effective performance than achievable under the stated Bid specifications. These alternatives may include related commodities or services that may be available to enhance performance during the period of the Contract. The Quote should describe how any alternative achieves substantially equivalent or better performance to that of the Bid specifications.

The Commission will determine if a proposed alternative method of performance achieves substantially equivalent or better performance. The goal of this Bid is to provide the best value of commodities and/or services to achieve the goals of the procurement.

## **7 HOW TO SUBMIT A QUOTE**

All Vendors may begin creating and compiling Quote materials responsive to this RFR as soon as the Bid with all attachments is in the Sent document status. Vendors are instructed not to submit Quotes before the Bid Amendment Deadline has been reached (see Estimated Procurement Calendar).

### **7.1 Quote Submission Method**

Online Quote Submission via COMMBUYS is required.

All Vendors must submit Quotes online using tools available only to Vendors registered in COMMBUYS. COMMBUYS provides Vendor registration functionality at no charge. To register, go to [www.COMMBUYS.com](http://www.COMMBUYS.com) and click on the "Register" link on the front page. All Vendors who are awarded a contract resulting from this Bid, if any, will be required to maintain an active account during the duration of the Contract, by reviewing their registration information regularly and maintaining its accuracy.



## 7.2 COMMBUYS Quote Submission Training and Instructions

The following resources are provided to assist Vendors in submitting Quotes:

- **Appendix 4, Instructions for Vendors Responding to Bids Electronically through COMMBUYS, which is part of this document;**
- An online job aid, Create a Quote in COMMBUYS, *available at* <https://www.mass.gov/files/documents/2019/03/19/Create-Quote-In-COMMBUYS.pdf>,
- An online job aid, How to Register on COMMBUYS, *available at*: [https://www.mass.gov/files/documents/2019/03/15/JA\\_Vendors\\_COMMBUYS-Vendor-Registration.pdf](https://www.mass.gov/files/documents/2019/03/15/JA_Vendors_COMMBUYS-Vendor-Registration.pdf)
- Webcast video on How to Create a Quote in COMMBUYS (Locate and Respond to Bid Solicitations), *available at* <https://www.youtube.com/watch?v=IG7XDNk4-U0>.

## 7.3 COMMBUYS Support

Technical assistance is available during the procurement process. Every effort is made to respond to inquiries within one business day.

**Website:** Go to [www.mass.gov/osd/COMMBUYS](http://www.mass.gov/osd/COMMBUYS) and select the COMMBUYS Resource Center link offered under Key Resources.

**Email:** Send inquiries to the COMMBUYS Helpdesk at [OSDHelpDesk@mass.gov](mailto:OSDHelpDesk@mass.gov).

**Telephone:** Call the COMMBUYS Help Desk at 1-888-MA-STATE (1-888-627-8283). The Help Desk is staffed from 8:00 AM to 5:00 PM Monday through Friday Eastern Standard or Daylight time, as applicable, except on federal and state holidays.

Vendors are advised that COMMBUYS will be unavailable during regularly scheduled maintenance hours of which all users will be notified.

## 7.4 Bid Opening Date/Time

All Bids must be received by the Cannabis Control Commission before the specified date, month, year and time displayed as the Bid Opening Date/Time in the Header Information section of the Bid in COMMBUYS. Times are Eastern Standard/Daylight Savings (US), as applicable. All Vendors are advised to allow adequate time for submission by considering potential online submission impediments like Internet traffic, Internet connection speed, file size, and file volume. The Commission is not responsible for delays encountered by Vendors or their agents, or for a Vendor's local hardware failures, such as computers or





related networks, associated with bid compilation or submission. Bids submitted via COMMBUYS are time stamped by the COMMBUYS system clock which is considered the official time of record.

## **7.5 Quote Contents**

Vendors must comply with the requirements below.

### **7.5.1 Electronic Signatures**

Quotes submitted via COMMBUYS must be signed electronically by the Vendor or the Vendor's Agent by accepting the terms and conditions of the bid on the "Terms & Conditions" tab of the Bid in COMMBUYS. By selecting "Save & Continue" on the "Terms and Conditions" tab after accepting the terms and conditions of the bid, the submitter attests that s/he is an agent of the Vendor with authority to sign on the Vendor's behalf, and that s/he has read and assented to each document's terms.

### **7.5.2 Ink Signatures**

Original ink signatures are required **only after contracts have been awarded**. The Commonwealth of Massachusetts requires Vendors to submit original ink-signature versions of the following forms:

- Standard Contract Form
- Commonwealth Terms and Conditions
- Contractor Authorized Signatory Listing
- Request for Taxpayer Identification and Verification (Mass. Substitute W9 Form)
- Electronic Funds Transfer Sign Up Form

Successful Vendors who agreed to the terms and conditions of these forms electronically via COMMBUYS online Quote submission tool must still submit the above forms with ink signatures within seven (7) calendar days of award notification or their contract may not be executed by the Commonwealth. Vendors who have previous contract(s) with the Commonwealth and have up-to-date, ink-signature versions of the Commonwealth Terms and Conditions and Request for Taxpayer Identification and Verification (Mass. Substitute W9 Form) on file with the Office of the State Comptroller may submit copies of the signed forms. However, a new Standard Contract Form and Contractor Authorized Signatory Listing with original ink signatures must be submitted for each new contract with the Commonwealth.

## **7.6 Limits and Restrictions**



### **7.6.1 File Format Restrictions**

All scanned documents must be in .pdf or .gif format, and must be scanned in such a way that they can be read on a computer monitor and printed on 8 ½” x 11” paper, unless otherwise specified. Forms provided for the Vendor to complete, with the exception of the forms requiring ink signatures, must be completed and submitted in their original formats, NOT scanned and submitted as PDF or other file types.

### **7.6.2 Documents and items that cannot be submitted electronically**

Documents and items that cannot be submitted electronically, like confidential business references submitted by the reference, must be submitted to the following address in accordance with all of the Quote submission requirements including Bid Opening Date/Time, and Bid Package provisions.

Mail these documents and items to:

Adriana Leon  
Cannabis Control Commission  
Union Station  
2 Washington Square  
Worcester, MA 01604

At the top of each document, Vendors must indicate their Vendor information (name, address, contact information) and the name of the document.

## **7.7 Withdrawing a Quote**

### **7.7.1 Prior to Bid Opening Date/Time**

Quotes may be withdrawn using the “Withdraw Quote” button offered under the Summary tab of a submitted Quote.

### **7.7.2 After Bid Opening Date/Time**

No Quote can be withdrawn after the Bid Opening Date/Time. If the Vendor wants to remove a Quote from consideration, contact the Strategic Sourcing Services Lead for guidance.

## **7.8 Additional Quote Terms**

### **7.8.1 Prohibition regarding contract terms**

Vendors must not, as part of their Quote, propose additional contractual terms, or supplemental or clarifying language pertaining to contractual terms, even if the proposed additions/clarifications are not in conflict with the Commonwealth Terms and Conditions, the Standard Contract Form, or other documents comprising this RFR. It is essential for Contracting



Departments that all Vendors' Statewide Contracts can be depended upon to incorporate the same terms and only those terms. Vendors who wish to propose additional non-conflicting contractual terms, or supplemental or clarifying language, may do so ONLY on a case-by-case basis, negotiated for each specific engagement and memorialized in the Project Statement of Work.



## **8 APPENDIX 1 – REQUIRED TERMS FOR ALL RFRS**

### **8.1 General Procurement Information**

#### **8.1.1 Alterations**

Vendors may not alter (manually or electronically) the Bid language or any Bid component files, except as directed in the RFR. Modifications to the body of the Bid, specifications, terms and conditions, or which change the intent of this Bid are prohibited and may disqualify a Quote.

#### **8.1.2 Ownership of Submitted Quotes**

The Commission shall be under no obligation to return any Quotes or materials submitted by a Vendor in response to this Bid. All materials submitted by Vendors become the property of the Commonwealth of Massachusetts and will not be returned to the Vendor. The Commonwealth reserves the right to use any ideas, concepts, or configurations that are presented in a Vendor's Quote, whether or not the Quote is selected for Contract award.

Quotes stored on COMMBUYS in the encrypted lock-box are the file of record. Vendors retain access to a read-only copy of this submission via COMMBUYS, as long as their account is active. Vendors may also retain a traditional paper copy or electronic copy on a separate computer or network drive or separate media, such as CD or DVD, as a backup.

#### **8.1.3 Prohibitions**

Vendors are prohibited from communicating directly with any employee of the Commission regarding this RFR except as specified in this RFR, and no other individual Commonwealth employee or representative is authorized to provide any information or respond to any question or inquiry concerning this RFR. Vendors may contact the contact person using the contact information provided in the Header Information this Bid in the event that this RFR is incomplete or information is missing. Vendors experiencing technical problems accessing information or attachments stored on COMMBUYS should contact the [COMMBUYS Helpdesk](#) (see the document cover page for contact information).

In addition to the certifications found in the Commonwealth's Standard Contract Form, by submitting a Quote, the Vendor certifies that the Quote has been arrived at independently and has been submitted without any communication, collaboration, or without any agreement, understanding or planned common course or action with, any other Vendor of the commodities and/or services described in the RFR.



## **8.2 Terms and Requirements Pertaining to Awarded Contracts**

### **8.2.1 Commonwealth Tax Exemption**

Invoices or invoices submitted to Massachusetts government entities must not include sales tax.

### **8.2.2 Vendor's Contact Information**

It is the Vendor's responsibility to keep the Vendor's Contract Manager information current. If this information changes, the Vendor must notify the Contract Manager by email immediately, using the address located in the Header Information of the Purchase Order or Master Blanket Purchase Order on COMMBUYS.

The Commission assumes no responsibility if a Vendor's designated email address is not current, or if technical problems, including those with the Vendor's computer, network or internet service Vendor (**ISP**), cause email communications between the Vendor and the Commission to be lost or rejected by any means including email or spam filtering.

### **8.2.3 Publicity**

Any Vendor awarded a contract under this Bid is prohibited from selling or distributing any information collected or derived from the Contract, including Commonwealth employee names, telephone numbers or addresses, or any other information except as specifically authorized by the Commission.

## **9 APPENDIX 2 - RFR - REQUIRED SPECIFICATIONS**

The terms of *801 CMR 21.00: Procurement of Commodities and Services* are incorporated by reference into this RFR. Words used in this RFR shall have the meanings defined in 801 CMR 21.00. Additional definitions may also be identified in this RFR. Other terms not defined elsewhere in this document may be defined in OSD's [Glossary of Terms](#). Unless otherwise specified in this RFR, all communications, responses, and documentation must be in English, all measurements must be provided in feet, inches, and pounds and all cost proposals or figures in U.S. currency. All responses must be submitted in accordance with the specific terms of this RFR.

COMMBUYS Market Center. COMMBUYS is the official source of information for this Bid and is publicly accessible at no charge at [www.COMMBUYS.com](http://www.COMMBUYS.com). Information contained in this document and in COMMBUYS, including file attachments, and information contained in the related Bid Questions and Answers (Q&A), are all components of the Bid, as referenced in COMMBUYS, and are incorporated into the Bid and any resulting contract.



Vendors are solely responsible for obtaining all information distributed for this Bid via COMMBUYS. Bid Q&A supports Vendor submission of written questions associated with a Bid and publication of official answers.

It is each Vendor's responsibility to check COMMBUYS for:

- Any amendments, addenda or modifications to this Bid, and
- Any Bid Q&A records related to this Bid.

The Commonwealth accepts no responsibility and will provide no accommodation to Vendors who submit a Quote based on an out-of-date Bid or on information received from a source other than COMMBUYS.

COMMBUYS Registration. Vendors may elect to obtain a free COMMBUYS Seller registration which provides value-added features, including automated email notification associated with postings and modifications to COMMBUYS records. However, in order to respond to a Bid, Vendors must register and maintain an active COMMBUYS Seller account.

All Vendors submitting a Quote (previously referred to as Response) in response to this Bid (previously referred to as Solicitation) agree that, if awarded a contract: (1) they will maintain an active seller account in COMMBUYS; (2) they will, when directed to do so by the procuring entity, activate and maintain a COMMBUYS-enabled catalog using Commonwealth Commodity Codes; (3) they will comply with all requests by the procuring entity to utilize COMMBUYS for the purposes of conducting all aspects of purchasing and invoicing with the Commonwealth, as added functionality for the COMMBUYS system is activated; (4) Vendor understands and acknowledges that all references to the Comm-PASS website or related requirements throughout this RFR, shall be superseded by comparable requirements pertaining to the COMMBUYS website; and (6) in the event the Commonwealth adopts an alternate market center system, successful Vendors will be required to utilize such system, as directed by the procuring entity. Commonwealth Commodity Codes are based on the United Nations Standard Products and Services Code (UNSPSC).

The COMMBUYS system introduces new terminology, which Vendors must be familiar with in order to conduct business with the Commonwealth. To view this terminology and to learn more about the COMMBUYS system, please visit the [COMMBUYS Resource Center](#).

Supplier Diversity Program (SDP). Massachusetts [Executive Order 565](#) reaffirmed and expanded the Commonwealth's policy to promote the award of state contracts in a manner that develops and strengthens certified Minority Business Enterprises (MBEs), Women Business Enterprises (WBEs), Minority and Women Nonprofit Organizations (M/WNPOs), Veteran Business Enterprises (VBEs), Service-Disabled Veteran-Owned Business Enterprises (SDVOBEs), Disability-Owned Business Enterprises (DOBEs), and Lesbian, Gay, Bisexual and Transgender Business Enterprises (LGBTBEs).



**Partnerships with certified diverse businesses:** All Vendors are **required** to make a significant financial commitment to partner with certified M/WBEs, M/WNPOs, VBEs, SDVOBEs, DOBEs and/or LGBTBEs certified or verified by the Supplier Diversity Office (**SDO**). Vendors must identify a commitment in the form of a specific percentage of sales made under the resulting contract that will be spent with an SDP Partner(s) on a Massachusetts fiscal year basis, using SDP Plan Form #1 – SDP Plan Commitment. This percentage commitment will extend for the life of any resulting contract.

This requirement extends to all Vendors regardless of their certification status, and no Vendor will be awarded a Contract unless and until the above requirement is met. Vendors may not list themselves or affiliates as SDP Partners. In order to ensure compliance with this section and encourage Vendor participation, SDP Plans will be evaluated at 10% or more of the total evaluation score for all for Large Procurements (those with a total value of greater than \$150,000). SDP Plan submission is encouraged but not required for Small Procurements (those with a total value equal to or less than \$150,000).

Once an SDP commitment is approved, the agency will monitor the Vendor’s performance, and use the Vendor’s reported expenditures with M/WBEs, M/WNPOs, VBEs and SDVOBEs to fulfill their own SDP expenditure benchmarks. The Commonwealth reserves the right to contact SDP Partners at any time to request that they attest to the amounts reported to have been paid to them by the Vendor.

**SDP Forms:** Unless otherwise specified in the RFR, the following SDP forms are required to be submitted by the deadlines noted below in order to meet the mandatory participation requirements of the SDP:

<b>SDP Plan Form #/Name</b>	<b>Submitted By</b>	<b>When Submitted</b>
SDP Plan Form #1 – SDP Plan Commitment	All Vendors	With Bid Response
SDP Plan Form #2 – Declaration of SDP Partners	Newly Awarded Contractors	Within 30 days of contract execution
SDP Plan Form #3 – SDP Spending Report	Contractors	Within 45 days of the end of each quarter

In addition to the requirements above, all Vendors must follow the requirements set forth in the Supplier Diversity Program (**SDP**) Plan Section of the RFR. During the life of the contract, the Commonwealth reserves the right to expand the range of certified business categories available for SDP partnerships to all those mentioned above and/or request reports on the Contractors’ spending with such certified business categories.



**Supplier Diversity Program (SDP) Resources:** Vendors may refer to the [SDP Resources for Vendors and Contractors](#) webpage for additional program information, training and compliance resources.

Best Value Selection and Negotiation. The Commission may select the response(s) which demonstrates the best value overall, including proposed alternatives that will achieve the procurement goals of the department. The Commission and a selected Vendor, or a contractor, may negotiate a change in any element of contract performance or cost identified in the original RFR or the selected Vendor's or contractor's response which results in lower costs or a more cost effective or better value than was presented in the selected Vendor's or contractor's original response.

Contract Expansion. If additional funds become available during the contract duration period, the department reserves the right to increase the maximum obligation to some or all contracts executed as a result of this RFR or to execute contracts with contractors not funded in the initial selection process, subject to available funding, satisfactory contract performance and service or commodity need.

Costs. Costs which are not specifically identified in the Vendor's response, and accepted by a department as part of a contract, will not be compensated under any contract awarded pursuant to this RFR. The Commonwealth will not be responsible for any costs or expenses incurred by Vendors responding to this RFR.

Electronic Communication/Update of Vendor's/Contractor's Contact Information. It is the responsibility of the prospective Vendor and awarded contractor to keep current on COMMBUYS the email address of the Vendor's contact person and prospective contract manager, if awarded a contract, and to monitor that email inbox for communications from the Commission, including requests for clarification. The Commission and the Commonwealth assume no responsibility if a prospective Vendor's/awarded contractor's designated email address is not current, or if technical problems, including those with the prospective Vendor's/awarded contractor's computer, network or internet service Vendor (ISP) cause email communications sent to/from the prospective Vendor/awarded contractor and the Commission to be lost or rejected by any means including email or spam filtering.

Electronic Funds Transfer (EFT). All Vendors responding to this RFR must agree to participate in the Commonwealth Electronic Funds Transfer (EFT) program for receiving payments, unless the Vendor can provide compelling proof that it would be unduly burdensome. EFT is a benefit to both contractors and the Commonwealth because it ensures fast, safe and reliable payment directly to contractors and saves both parties the cost of processing checks. Contractors are able to track and verify payments made electronically through the Comptroller's Vendor Web system. A link to the EFT application can be found on the [OSD Forms](#) page ([www.mass.gov/osd](http://www.mass.gov/osd)). Additional information about EFT is available on the [VendorWeb](#) site ([www.mass.gov/osc](http://www.mass.gov/osc)). Click on MASSfinance.

Successful Vendors, upon notification of contract award, will be required to enroll in EFT as a contract





requirement by completing and submitting the *Authorization for Electronic Funds Payment Form* to this department for review, approval and forwarding to the Office of the Comptroller. If the Vendor is already enrolled in the program, it may so indicate in its response. Because the *Authorization for Electronic Funds Payment Form* contains banking information, this form, and all information contained on this form, shall not be considered a public record and shall not be subject to public disclosure through a public records request.

The requirement to use EFT may be waived by the Commission on a case-by-case basis if participation in the program would be unduly burdensome on the Vendor. If a Vendor is claiming that this requirement is a hardship or unduly burdensome, the specific reason must be documented in its response. The Commission will consider such requests on a case-by-case basis and communicate the findings with the Vendor.

**Prompt Payment Discounts (PPD).** All Vendors responding to this procurement must agree to offer discounts through participation in the Commonwealth Prompt Payment Discount (**PPD**) initiative for receiving early and/or on-time payments, unless the Vendor can provide compelling proof that it would be unduly burdensome. PPD benefits both contractors and the Commonwealth. Contractors benefit by increased, usable cash flow as a result of fast and efficient payments for commodities or services rendered. Participation in the Electronic Funds Transfer initiative further maximizes the benefits with payments directed to designated accounts, thus eliminating the impact of check clearance policies and traditional mail lead time or delays. The Commonwealth benefits because contractors reduce the cost of products and services through the applied discount. Payments that are processed electronically can be tracked and verified through the Comptroller's Vendor Web system. The PPD form can be found as an attachment for this Bid on [COMMBUYS](#).

Vendors must submit agreeable terms for Prompt Payment Discount using the PPD form within their proposal, unless otherwise specified by the Commission. The Commission will review, negotiate or reject the offering as deemed in the best interest of the Commonwealth.

The requirement to use PPD offerings may be waived by the Commission on a case-by-case basis if participation in the program would be unduly burdensome on the Vendor. If a Vendor is claiming that this requirement is a hardship or unduly burdensome, the specific reason must be documented in or attached to the PPD form.

**Public Records.** All responses and information submitted in response to this RFR are subject to the Massachusetts Public Records Law, M.G.L., c. 66, § 10, and to c. 4, § 7, cl. 26. Any statements in submitted responses that are inconsistent with these statutes, including marking by Vendors of information as confidential during the quote submission process in COMMBUYS, shall be disregarded.

**Reasonable Accommodation.** Vendors with disabilities or hardships that seek reasonable accommodation, which may include the receipt of RFR information in an alternative format, must communicate such requests in writing to the contact person. Requests for accommodation will be addressed on a case by case basis. A Vendor requesting accommodation must submit a written statement which describes the Vendor's



disability and the requested accommodation to the contact person for the RFR. The Commission reserves the right to reject unreasonable requests.

Restriction on the Use of the Commonwealth Seal. Vendors and contractors are not allowed to display the Commonwealth of Massachusetts Seal in their bid package or subsequent marketing materials if they are awarded a contract because use of the coat of arms and the Great Seal of the Commonwealth for advertising or commercial purposes is prohibited by law.

Subcontracting Policies. Prior approval of the Commission is required for any subcontracted service of a contract. Contractors are responsible for the satisfactory performance and adequate oversight of its subcontractors. Subcontractors are also required to meet the same state and federal financial and program reporting requirements and are held to the same reimbursable cost standards as contractors. Successful Vendors must ensure subcontractor compliance with the Master Agreement.

## **10 APPENDIX 3 - INSTRUCTIONS FOR EXECUTION AND SUBMISSION OF COMMONWEALTH STANDARD FORMS**

Some of the forms listed below can be electronically signed by the Vendor, see [Electronic Signatures](#). However, online Vendors must, if notified of Contract award, submit the following four (4) forms on paper with original ink signatures unless otherwise specified below, within the timeframe referenced in the RFR section entitled [Ink Signatures](#): the Commonwealth Standard Contract Form, the Commonwealth Terms and Conditions, the Request for Taxpayer Identification Number and Certification (Mass. Substitute W9 Form) and the Contractor Authorized Signatory Listing.

### **10.1 Commonwealth Standard Contract Form**

Sign electronically as described above; **if notified of Contract award**, complete as directed below and submit on paper with original ink signature and date.

By executing this document or signing it electronically, the Vendor certifies, under the pains and penalties of perjury, that it has submitted a Response to this RFR that is the Vendor's Offer as evidenced by the execution of its authorized signatory, and that the Vendor's Response may be subject to negotiation by the Commission. Also, the terms of the RFR, the Vendor's Response and any negotiated terms shall be deemed accepted by the Operational Services Division and included as part of the Contract upon execution of this document by the State Purchasing Agent or his designee.

If the Vendor does not have a Vendor Code beginning with "VC," or does not know what their Vendor Code is, the Vendor should leave the Vendor Code field blank. The Vendor should NOT enter a Vendor Code assigned prior to May 2004, as new Vendor Codes have been assigned to all companies since that time.

Signature and date MUST be handwritten in ink, and the signature must be that of one of the people authorized to execute contracts on behalf of the Contractor on the Contractor Authorized Signatory Listing (See below).



## **10.2 Commonwealth Terms and Conditions**

Sign electronically as described above; **if notified of Contract award**, complete as directed below and submit on paper with original ink signature and date, or submit a copy of a previously executed, up-to-date copy of the form as directed below.

If the Vendor has already executed and filed the Commonwealth Terms and Conditions form pursuant to another RFR or Contract, a copy of this form may be included in place of an original. If the Vendor's name, address or Tax ID Number have changed since the Commonwealth Terms and Conditions form was executed, a new Commonwealth Terms and Conditions form is required. The Commonwealth Terms and Conditions are hereby incorporated into any Contract executed pursuant to this RFR.

This form must be unconditionally signed by one of the authorized signatories (see Contractor Authorized Signatory Listing, below), and submitted without alteration. If the provisions in this document are not accepted in their entirety without modification, the entire Proposal offered in response to this Solicitation may be deemed non-responsive.

The company's correct legal name and legal address must appear on this form, and must be identical to the legal name and legal address on the Request for Taxpayer Identification and Certification Number (Mass. Substitute W9 Form).

## **10.3 Request for Taxpayer Identification Number and Certification (Mass. Substitute W9 Form)**

Sign electronically as described above; **if notified of Contract award**, complete as directed below and submit on paper with original ink signature and date, or submit a copy of a previously executed, up-to-date copy of the form as directed below.

If a Vendor has already submitted a Request for Taxpayer Identification and Certification Number (Mass. Substitute W9 Form) and has received a valid Massachusetts Vendor Code, an original W-9 form is not required. A copy of the form as filed may be included in place of an original. If the Vendor's name, address or Tax ID Number have changed since the Mass. Substitute W9 Form was executed, a new Mass. Substitute W9 Form is required. The information on this form will be used to record the Vendor's legal address and where payments under a State Contract will be sent. The company's correct legal name and legal address must appear on this form, and must be identical to the legal name and legal address on the Commonwealth Terms and Conditions. Please do not use the U.S Treasury's version of the W9 Form.

## **10.4 Contractor Authorized Signatory Listing**

Sign electronically as described above; **if notified of Contract award**, complete as directed below and submit on paper with original ink signature and date.

In the table entitled "Authorized Signatory Name" and "Title," type the names and titles of those individuals authorized to execute contracts and other legally binding documents on behalf of the Vendor. Vendors are advised to keep this list as small as possible, as Contractors will be required to notify the Procurement



Manager of any changes. If the person signing in the signature block on the bottom of the first page of this form will also serve as an “Authorized Signatory,” that person’s name must be included in the typed table.

With regard to the next paragraph, which begins “I certify that I am the President, Chief Executive Officer, Chief Fiscal Officer, Corporate Clerk or Legal Counsel for the Contractor...,” if your organization does not have these titles, cross them out and handwrite the appropriate title above the paragraph.

The signature and date should be handwritten in ink. Title, telephone, fax and email should be typed or handwritten legibly.

The second page of the form (entitled “Proof of Authentication of Signature”) states that the page is optional. However, the “optional” aspect of the form is that Commonwealth Departments are not required to use it. In the case of Statewide Contracts, this page is REQUIRED, not optional. The person signing this page must be the same person signing the Standard Contract Form, the Commonwealth Terms and Conditions, and the RFR Checklist.

Please note that in two places where the form says “in the presence of a notary,” this should be interpreted to mean “in the presence of a notary or corporate clerk/secretary.” Either a notary or corporate clerk/secretary can authenticate the form; only one is required.

Organizations whose corporate clerks/secretaries authenticate this form are not required to obtain a Corporate Seal to complete this document.

#### **10.5 Supplier Diversity Program Plan Form 1**

Download this form and complete as directed below; include with online submission. Ink signature is not required.

The specific Supplier Diversity Program (SDP) requirements for this procurement can be found earlier in this document. Vendors are required to state a specific percentage of contract revenues that will represent the SDP annual commitment for the entire contract period, including any renewals.

#### **10.6 Prompt Payment Discount Form**

Download this form and complete as directed below; include with online submission. Ink signature is not required.

Pursuant to the Prompt Payment Discount terms set forth in the RFR Required Specifications for Contracts and on the Prompt Payment Discount Form itself, all Vendors must execute this form. After entering the “Vendor Name” and “Date of Offer for Prompt/Early Payment Discount”, the Vendor must identify the prompt payment discount(s) terms by indicating the “Percentage Discount off of the Proposed Pricing” and the “Turn-around-time for Payments.” In the event of a hardship that prevents the Vendor from offering a prompt payment discount, the Vendor must document this fact and provide supporting information. If



awarded a contract, the final negotiated prompt payment discounts should be reflected on the Commonwealth Standard Contract Form.

#### **10.7 Business Reference Form**

Download this form and complete as directed below; include with online submission. Ink signature is not required.

Vendors must provide all requested information on this form for required references. In completing this form, note that the “Vendor” is the name of the company submitting a Quote in response to this RFR and the “RFR Name/Title” and the “Agency Document Number” can be found on the cover of the RFR document and in the Short Description field in the Header Information of the Bid record in COMMBUYS. Also, please note that: “Reference Name” is the name of the organization (if not applicable, then name of the individual) that is providing the reference; “Contact” is the name of the individual inside the organization that will provide the reference; and the “Address,” “Phone #” and “Fax/Internet Address” are those of the “Contact” so that the Commission may be able to reach them.

## 11 APPENDIX 4 – INSTRUCTIONS FOR VENDORS RESPONDING TO BIDS ELECTRONICALLY THROUGH COMMBUYS

### Introduction

COMMBUYS refers to all solicitations, including but not limited to Requests for Proposals (RFP), Invitations for Bid (IFB), Requests for Response (RFR), Requests for Quote (RFQ), as “Bids.” All responses to Bids are referred to as “Quotes.”

### Steps for Vendors to Submit a Quote

1. Launch the COMMBUYS website by entering the URL ([www.COMMBUYS.com](http://www.COMMBUYS.com)) into the browser.
2. Enter Vendor login credentials and click the **Login** button on the COMMBUYS homepage. Vendors must be registered in COMMBUYS in order to submit a Quote. Each Vendor has a COMMBUYS Seller Administrator, who is responsible for maintaining authorized user access to COMMBUYS.
3. Upon successful login, the Vendor home page displays with the Navigation and Header Bar as well as the Control Center. The Control Center is where documents assigned to your role are easily accessed and viewed.
4. Click on the **Bids** tab
5. Clicking on the Bid tab opens four sections:
  - a. Request for Revision
  - b. Bids/Bid Amendments
  - c. Open Bids
  - d. Closed Bids
6. Click on the blue **Open Bid** hyperlinks to open and review an open bid
7. A new page opens with a message requesting you acknowledge receipt of the bid. Click **Yes** to acknowledge receipt of the bid. Vendors should acknowledge receipt to receive any amendments/updates concerning this bid.
8. After acknowledgement, the bid will open. The top left half of the page contains the following information:
  - a. Purchaser



- b. Department
  - c. Contact for this bid
  - d. Type of purchase
    - i. Open Market
    - ii. Blanket
  - e. Pre-Bid Conference details (if applicable)
  - f. Ship-to and Bill-to addresses
  - g. Any attachments to the bid, which may include essential bid terms, response forms, etc.
- The top right half of the bid includes the following information:

- h. Bid Date
  - i. Required Date
  - j. Bid Opening Date – date the bid closes and no further quotes will be accepted
  - k. Informal Bid Flag
  - l. Date goods/services are required
9. The lower half of the page provides information about the specific goods/services the bid is requesting.
10. Click **Create Quote** to begin.
11. The General tab for a new quote opens. This page is populated with some information from the bid. Fields available to update include:
- a. Delivery days
  - b. Shipping terms
  - c. Ship via terms
  - d. Is “no” bid – select if you will not be submitting a quote for this bid
  - e. Promised Date
  - f. Info Contact
  - g. Comments
  - h. Discount Percent
  - i. Freight Terms
  - j. Payment Terms

It is important to note that the bid documents (RFR and attachments) may specify some or all of these terms and may prohibit you from altering these terms in your response. Read the bid documents carefully and fill in only those items that are applicable to the bid to which you are responding.

Update these fields as applicable to the bid and click **Save & Continue** to save any changes and create a Quote Number.



The page refreshes and messages display. Any message in Red is an error and must be resolved before the quote can be submitted. Any message in Yellow is only a warning and will allow processing to continue.

The following messages are received:

Terms & Conditions is not acknowledged – to resolve this, click on the Terms & Conditions tab and accept the terms. Your quote has not been submitted – information message; no action required

12. Click on the Terms & Conditions Tab. This tab refers to the terms and conditions that apply to this bid. The terms and conditions must be accepted before your quote can be submitted. If your acceptance is subject to any exceptions, those exceptions must be identified here. Exceptions cannot contradict the requirements of the RFR, or required Commonwealth standard forms and attachments for the bid. For instance, an RFR may specify that exceptions may or will result in disqualification of your bid.
13. Click the **Items** tab. The Items tab displays information about the items requested in the bid. To view additional details about an item, click the item number (blue hyperlink) to open.
14. The item opens. Input all of your quote information and click **Save & Exit**.
15. **CONFIDENTIAL INFORMATION:** If documents uploaded in your quote response contain confidential information (security sensitive, EFT, W9, Commonwealth Terms and Conditions), **you must mark each item as confidential**. The confidential column on the Attachments view allows the user to select whether the attached form is confidential or not. Place a check box under the confidential column for each confidential attached form.
16. Click on the **Attachments** Tab. Follow the prompts to upload and name all required attachments and forms and bid response documents in accordance with the instructions contained in the solicitation or bid documents. After uploading each individual file or form, click **Save & Continue**. After you have uploaded all required documents click **Save & Exit**. Be sure to review your attachments to make sure each required document has been submitted.
17. Click the Summary tab. Review the information and update/correct, as needed. If the information is correct, click the **Submit Quote** button at the bottom of the page.
18. A popup window displays asking for verification that you wish to submit your quote. Click **OK** to submit the quote.





19. The Summary tab redisplay with an updated Status for the quote of **Submitted**.
20. Your quote submission is confirmed only when you receive a confirmation email from COMMBUYS. If you have submitted a quote and have not received an email confirmation, please contact the COMMBUYS Help Desk at [COMMBUYS@state.ma.us](mailto:COMMBUYS@state.ma.us).

If you wish to revise or delete a quote after submission, you may do so in COMMBUYS: (1) for a formal bid, prior to the bid opening date, or (2) for an informal bid (which may be viewed upon receipt), prior to the opening of your quote by the issuing entity or the bid opening date, whichever is earlier.

Vendors may not submit Multiple Quotes in response to a Bid unless the Bid authorizes Multiple Quote submissions. If you submit multiple quotes in response to a bid that does not allow multiple quotes, only the latest submission prior to the bid opening date will be evaluated.



## 12 APPENDIX 5 – TEMPLATE STATEMENT OF WORK

---

**STATEMENT OF WORK**  
**BETWEEN**  
**THE CANNABIS CONTROL COMMISSION**  
**AND**  
**[CONTRACTOR NAME]**  
**FOR THE PROVISION OF**  
**TRAINING AND TECHNICAL ASSISTANCE SERVICES AND MATERIALS**

---

### 1. INTRODUCTION

This document serves as the Statement of Work (**SOW**) between the Cannabis Control Commission (**Commission**) and [CONTRACTOR NAME] (**Contractor**) for (1) professional training and technical assistance services and (2) course work and materials, each developed and delivered to participants in the Commission’s Social Equity Program (**SEP**) established under 935 CMR 500.105(17), in accordance with this SOW (the **Services**).

The Commission is responsible for safely, equitably and effectively implementing the laws governing the adult-use marijuana industry in the Commonwealth of Massachusetts (**Commonwealth**), specifically, G.L. c. 94G, G.L. c. 94I, 935 CMR 500.000, 935 CMR 501.000, 935 CMR 502.000, and the enabling legislation, St. 2016, c. 334, *The Regulation and Taxation of Marijuana Act*, as amended by St. 2017, c. 55, *An Act to Ensure Safe Access to Marijuana*.

Pursuant to 935 CMR 500.105(17) the Commission established the SEP to provide training and technical assistance to eligible individuals who intend to apply and gain a license or licenses issued by the Commission, though this is not a program that will result in licensing. Training, technical assistance, course work, and materials shall include, without limitation,



1. Management, recruitment, and employee trainings;
2. Accounting and sales forecasting;
3. Tax prediction and compliance;
4. Legal compliance;
5. Business plan creation and operational development;
6. Marijuana industry best practices;
7. Assistance with identifying or raising funds or capital;
8. Such other topics as the Commission shall identify.

Generally, SEP participants are eligible if they have been impacted or their community has been disproportionately impacted by the enforcement of cannabis prohibition.

The Program aims to decrease the disparities in life outcomes, improve the quality of life, and reduce barriers to entry for SEP participants and their communities. The SEP also promotes sustainable, socially, and economically reparative practices, in Massachusetts's regulated cannabis industry.

SEP members complete course work for a pre-selected curriculum track. Tracks are chosen by SEP participants based on the participants' area of interest in the cannabis industry, their existing skillset and knowledge base, and their desired goals. Within each track, Contractor shall provide comprehensive programming and hands-on guidance coupled with skills-based training to SEP participants.

The entire agreement (the **Agreement**) between the parties consists of the following documents. In the event of conflict between any of underlying documents of the Agreement, documents shall control in the following order of precedence:

- (1) The Commonwealth Standard Contract Form (**SCF**);
- (2) The Commonwealth Terms and Conditions, incorporated by reference into the SCF (**T&Cs**);
- (3) This SOW;
- (4) An executed Intellectual Property and Work Effort Agreement for Employees Consultants, and Agents, executed by each member of Key Personnel identified in Table 1 (**IPWE Agreement**);
- (5) Enterprise Information Security Policy issued by Massachusetts Executive Office of Technology Services and Security (**EOTTS Policy**);
- (6) Request for Response [RFR NUMBER] (**RFR**); and
- (7) Contractor's response to the RFR.

## 2. DEFINITIONS

The terms used in this SOW, unless defined in this SOW or in an amendment made pursuant to Section 3.3, will have the meaning ascribed to them in the other documents that constitute the Agreement between the parties.



- 2.1 “Confidential Information” shall mean any information not already lawfully available to the public concerning the Commission or Commonwealth, including but not limited to information regarding any website of the Commonwealth, any e-commerce products or services, any web development strategy, any financial information or any information regarding users of or Contractor to the Commonwealth’s websites. Confidential Information also includes, without limitation, any technical data, design, pattern, formula, computer program, source code, object code, algorithm, subroutine, manual, product specification, or plan for a new, revised or existing product or web site; any business, marketing, financial or sales information; and the present or future plans of the Commonwealth with respect to the development of its web sites and web services.
- 2.1.1 Confidential Information includes, without limitation:
- 2.1.1.1 Originated from or created by the Commission;
  - 2.1.1.2 Originated from or created by Vender under this Agreement;
  - 2.1.1.3 Submitted by licensees and applicants seeking registration or licensure with the Commission;
  - 2.1.1.4 Submitted by state and federal agencies working with the Commission;
  - 2.1.1.5 Designated as Confidential Information by the Commission; and
  - 2.1.1.6 Publicly or generally known by non-Commission personnel.
- 2.1.2 Commission Confidential Information does not include information that is: (i) is generally known or available to the public, or is in the public domain, at the time of disclosure by the Commission or, after such disclosure, becomes generally known to the public, or falls into the public domain, other than by a breach of this Agreement by Contractor or of the IPWEA by Contractor’s Key Personnel; (ii) is already legally in the possession of Contractor at the time of disclosure by the Commission; (iii) is disclosed to Contractor on a non-confidential basis by a third party having the right to make such disclosure; or (iv) is independently developed by Contractor without reliance in any way on any Commission Confidential Information.



- 2.2 “Deliverable” means any Tasks accomplished or work produced and delivered by Contractor for the purposes of fulfilling its obligations to the Commission under the terms of the Agreement, including that which Contractor must submit to the Commission for the Commission’s approval in accordance with the formal acceptance procedures set forth within the SOW or the Task Order(s) entered into hereunder.
- 2.3 “Milestone Payment” means a defined payment amount associated with the completion of a particular Deliverable or set of Deliverables.
- 2.4 “Task” means a material activity engaged in by Contractor for the purpose of completing a Deliverable or otherwise fulfilling its obligations to the Commission under the terms of the Agreement, which may or may not directly result in the creation of a Deliverable.
- 2.5 “Task Order” means an amendment to this SOW that specifies Tasks, Deliverables, or hourly rate services to be completed by Contractor under the terms of this Agreement.

### 3. TERM, TERMINATION, AND RENEWAL

- 3.1 Term. The term of this Agreement shall on the Contract Start date and continue through the Contract End Date identified in the Standard Contract (**Term**).
- 3.2 Termination.
- 3.2.1 Termination by Contractor. Contractor may terminate this Agreement upon sixty (60) days written notice to the Commission.
- 3.2.2 Termination by the Commission. The Commission shall have the right to terminate this Agreement in accordance with Section 4 of the T&Cs.
- 3.3 Renewal and Amendment.
- 3.3.1 Renewal. The Commission shall have the option to renew this Agreement.
- 3.3.2 Amendment. The Commission shall have the option to amend this Agreement to add, remove, or modify deliverables.
- 3.3.3 In the event that the Commission exercises its option to renew or amend this Agreement, the parties will negotiate in good faith an amendment to this Agreement (**Amended and Restated Agreement**) for such services and/or



duration as the Commission and Contractor shall agree are appropriate under the circumstances.

- 3.3.4 The total cost of the Services under an Amended and Restated Agreement shall not increase by more than 3%.

#### 4. **POINTS OF CONTACT; KEY PERSONNEL; CONFLICTS OF INTEREST**

- 4.1 Points of Contact. Contractor and the Commission shall each assign points of contact (each a **Point of Contact**) with respect to the rights and obligations under this SOW. It is anticipated that the Points of Contact will not change during the Term. If a change is necessary, the party requesting the change will provide two-weeks' written notice in accordance with Section 4.2 of this SOW. For a change resulting from an emergency, notice is required upon notice of such change. Unless otherwise agreed between the parties, the Point of Contact for each party shall serve that party's Project Manager, as defined in Section 4.3 of this SOW.
- 4.2 Notice. Any notice, approval, consent, or other communication under this Agreement shall be in accordance with Section 5 of the T&Cs and shall be in writing. A notice will be considered given when (i) delivered personally, (ii) mailed by registered or certified mail, return receipt requested, or (iii) transmitted by email to the parties' Point of Contact, in each case at the addresses indicated below (or at such other address as a party may specify by notice to the others pursuant hereto). Notice given by a party's counsel shall be considered notice given by that party.

Contractor's Point of Contact:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Phone: \_\_\_\_\_  
Email: \_\_\_\_\_

The Commission's Point of Contact:

Alyssa Flores  
Project Coordinator – Social Equity Program  
Cannabis Control Commission  
2 Washington Square  
Union Station 2nd Floor



Worcester, MA 01604  
Phone: 774-415-0200  
Email: Alyssa.Flores@CCCMass.com

- 4.3 Project Management. Each party will designate a Project Manager for the duration of the Agreement. Unless specified otherwise in writing, the Point of Contact for each party will serve as the Project Manager for that party. Each party must notify the other party of any change in the name, address, phone number, or electronic mail (email) address of their respective Project Manager.
- 4.3.1 The Commission's Project Manager or their designee shall perform project management tasks on behalf of the Commission for this engagement, including, without limitation:
- 4.3.1.1 Working closely with Contractor's Project Manager to ensure successful completion of the project.
  - 4.3.1.2 Consulting with Contractor's Project Manager to coordinate the Staffing Schedule.
  - 4.3.1.3 Coordinating Commission staff's review of Tasks or Deliverables and providing notice of acceptance or rejection for each Task or Deliverable.
  - 4.3.1.4 Communicating authorization of Tasks to be undertaken by Contractor.
- 4.3.2 Contractor's Project Manager will perform project management tasks on behalf of Contractor for this engagement, including, without limitation:
- 4.3.2.1 Responsibility for administering this Agreement and managing operations under this Agreement.
  - 4.3.2.2 Responsibility for the management and deployment of Contractor personnel.
  - 4.3.2.3 Serving as an interface between the Commission's Project Manager and all Contractor personnel participating in this engagement.



4.3.2.4 Developing and maintaining a project management plan (the Project Management Plan), in consultation with the Commission Project Manager and staff.

4.3.2.5 Facilitate regular communication with the Commission's Project Manager, including status reports/updates, including, without limitation, a review of Contractor's performance in relation to the Project Management Plan. Facilitate the Staffing Schedule, as requested by the Commission's Project Manager.

4.3.2.6 Update and distribute the Project Management Plan, as requested by the Commission's Project Manager.

4.3.2.7 Sign acceptance forms or emails to acknowledge their receipt from the Commission.

4.4 Issue Resolution. The Project Manager for each organization bears the primary responsibility for ensuring issue resolution. If the Project Managers mutually agree that they are unable to resolve an issue, they are responsible for escalating the issue to:

For Contractor:

\_\_\_\_\_  
\_\_\_\_\_  
Phone: \_\_\_\_\_  
Email: \_\_\_\_\_

For the Commission:

Cedric Sinclair  
Chief Communications Officer  
2 Washington Square  
Union Station 2<sup>nd</sup> Floor  
Worcester, MA 01604  
Phone: 774-415-0475  
Email: Cedric.Sinclair@CCCMass.com





- 4.5 **Key Personnel.** Contractor agrees to provide the Commission’s Point of Contact and with an electronic copy of a résumé for staff member, either listed below or enlisted during the performance of the Services, to conduct or contribute to any aspect of providing the Services (**Key Personnel**), including any individual that will have any contact or relationship with SEP participants. Contractor represents that the following personnel will provide the Services under this Agreement:

TABLE 1  
KEY PERSONNEL

Role	Name	Time Commitment expressed as percentage 40 hours per week

- 4.5.1 If Contractor engages any third-party Contractor or subcontractor in furtherance of providing the Services (each a Third-Party Contractor), Contractor agrees to (i) provide the Commission’s Point of Contact an electronic copy of a profile or résumé for each Third-Party Contractor and (ii) receive authorization from the Point of Contact prior to incurring fees from that Third-Party Contractor.
- 4.5.2 Contractor shall be responsible for executing any subscription, user, access, or other agreement required by any Third-Party Contractor. Commission shall not be required to execute any agreements in furtherance of the Services except the underlying documents of this Agreement, as specified in Section 1 of this SOW.
- 4.5.3 Prior to submission of the first Deliverable, Contractor must provide evidence to the Commission that each member of Key Personnel has completed an implicit bias training in the previous 12 months or substantially similar training or experience that, to the satisfaction of the Commission’s Point of Contact/Project Manager, qualifies Key Personnel to work, in an equitable and inclusive fashion, with diverse communities, including those historically marginalized or disproportionately impacted by the prohibition of cannabis.



- 4.6 Meetings between Commission and Contractor. All in-person meetings between the Commission and Contractor shall be held at the Commission's headquarters located at 2 Washington Square, Union Station 2nd Floor, Worcester, MA 01604, unless otherwise specified by the Commission. Virtual meetings shall be conducted via Microsoft Teams video call. Meetings must be scheduled at least three full business days in advance, with reasonable accommodation of attendees' schedules. If requested, all meetings will be described in a follow-up report generated by Contractor's Project Manager as defined in Section 4.3 and approved by the Commission's Project Manager
- 4.7 Intellectual Property and Work Effort Agreement for Contractor's Employees, Contractors and Consultants and Agents. Contractor shall ensure that each of Contractor's Key Personnel providing services under this SOW, regardless of whether the individual is an employee, contractor, or agent of Contractor, shall, prior to rendering any Services under this SOW, sign the IPWE Agreement. Contractor shall return the signed copies of the IPWE Agreement to the Commission's Project Manager prior to rendering any Services under this SOW.

## **5. DELIVERABLES**

- 5.1 This Section describes each Deliverable that Contractor will complete in the course of providing the Services. A Deliverable will be considered "complete" when all of the acceptance criteria set forth in this SOW have been met and the Commission has provided written notification of acceptance or the prescribed review period for each Deliverable has expired without written response from the Commission in accordance with the Acceptance or Rejection Process provided in Section 6.
- 5.2 All Deliverables that include written or digital documents and materials shall be delivered in machine-readable format, capable of being completely and accurately processed and read by the Commission and reproduced by computer software on a laser printer. All itemized and/or annotated lists shall be delivered in computer spreadsheets, capable of being imported to Microsoft Excel 2016 or an alternative desktop software used by the Commission. Data extracts will be delivered using secure transmission protocols, such as SFTP or equivalent.
- 5.3 For the Deliverables defined in Table 2 of this Agreement, Contractor shall complete Deliverables in conformance with the Acceptance and Rejection Process under Section 6 of this SOW, on or before Milestone Schedule date set forth in Table 2. With respect to the timely completion of Tasks and Deliverables, time is of the essence.



- 5.4 Fixed Price Deliverables. The Commission shall pay a fixed price for the Deliverables detailed in this SOW. Contractor shall provide Deliverables in conformance with the Description and Metrics of Acceptance on or before Milestone Schedule date set forth in Table 2.
- 5.5 **Course Descriptions:** *[course descriptions, applicable to each Contractor, will be provided in this subsection 5.5]*
- 5.6 Requirements for Deliverables. For each Deliverable, Contractor shall:
- 5.6.1 Submit all coursework for review at least three weeks prior to delivery of course to participants via email to: Alyssa.Flores@CCCMass.com;
  - 5.6.2 Submit list of instructors teaching a given course and relevant contact information via email to: Alyssa.Flores@CCCMass.com, regardless of whether such individual is named as Key Personnel under Section 4.5 of this SOW;
  - 5.6.3 Update existing digital and live/in-person learning materials based on Commission, SEP participant, and Contractor feedback, subject to review and approval by the Commission.
  - 5.6.4 Implement feedback provided following review of course materials and provide all updated, final materials at least one week prior to delivery of course to participants.
  - 5.6.5 Utilize participation and instructor reports from LMS (as defined in Section 5.7) to inform curriculum development and ensure courses are engaging and meeting course objectives.
- 5.7 Requirements for the Learning Management System. Commission shall maintain a Learning Management System (LMS). Contractor shall be responsible for:
- 5.7.1 Uploading and managing course materials within the LMS, including development of course check-ins with SEP participants as described in Sections 5.8 and 5.9.
  - 5.7.2 Integrating attendance and tracking procedures into LMS to manage program track and SEP participant lists, updates, and course attendance records.



- 5.7.3 Testing course upload to ensure course and materials are accessible at least one week prior to course availability to SEP participants.
- 5.7.4 Informing SEP participants of course availability and instructor information via email at least one day prior to the LMS deliverable due date established in Table 2.
- 5.7.5 Addressing any issues that may arise with participants for the duration of course availability in the LMS, including, without limitation, issues related to participant access to materials.
- 5.8 Requirements for the In-Person or Live-Streamed Course. In conducting SEP Program courses, Contractor shall:
  - 5.8.1 Ensure course is accessible for attendance by Commission designee to observe course and provide Commission and program updates.
  - 5.8.2 Implement course curriculum and conduct digital and/or in-person trainings, technical assistance, and/or mentoring of participants.
  - 5.8.3 Provide a date and time during the SEP programming for additional engagement with participants that have opted out of training.
  - 5.8.4 All universal courses must be provided in person or live-streamed through the LMS.
  - 5.8.5 Manage program track and SEP participant lists, updates, and course attendance records.
  - 5.8.6 Facilitate all communications with SEP participants regarding courses, unless otherwise specified by the Commission, including, without limitation, with respect to:
    - 5.8.6.1 Contact information and methods;
    - 5.8.6.2 Course scheduling and logistics;

- 5.8.6.3 Attendance requirements and attendance tracking;
- 5.8.6.4 Access to materials and make-up courses; and
- 5.8.6.5 Periodic follow up with participants after conclusion of program through duration of this contract. Follow up may be conducted on an individual or group basis.
- 5.8.7 Provide one-on-one learning opportunities for participants as requested.
- 5.8.8 Inform participants of in-person/virtual availability and instructor information at least one week prior to the in-person/virtual deliverable due date in Table 2.
- 5.9 Additional Requirements. In addition to the requirements established under Sections 5.6 and 5.8 and in Table 2, Contractor shall:
  - 5.9.1 Work with the Commission's Project Manager or designee in advance of each course, to identify and satisfy any additional reporting requirements.
  - 5.9.2 Attend and participate in Orientation Seminar & Graduation Ceremony.
  - 5.9.3 Provide at least one member of Contractor Key Personnel to participate and attentively engage in weekly Contractor calls during this the Term, unless otherwise specified by the Commission. Key Personnel assigned to participate in weekly Contractor calls must be prepared, and have requisite authority, to respond to curriculum questions, receive important information on behalf of the Contractor.
  - 5.9.4 Provide at least one member of Contractor Key Personnel to participate in a mid-program check-in to discuss feedback and develop working plans for the remainder of the program.
  - 5.9.5 Maintain course records with respect to overall SEP participant attendance and progress and report such information at each one-on-one, mid-program, and end-of program meetings with the Commission.
  - 5.9.6 Prior to communicating to participants, report and obtain approval by the Commission of all course scheduling adjustments or changes, except in cases of an emergency or unforeseen circumstance, at least two weeks prior to the date the course was originally scheduled to be delivered or the modified date, whichever is sooner.



- 5.9.7 In recognition of the increasing diversity of platforms on which consumers get information, ensure that any produced video recordings can be syndicated through a variety of platforms including, but not limited to, traditional broadcast television, local cable access, YouTube, and other social media and web-based platforms.
- 5.9.8 Ensure that all course formats meet state accessibility requirements for the sight and hearing impaired, including closed captioning, alternate file formats accessible by screen readers, content transcripts, and other requirements as provided by the Commission.
- 5.9.9 Supply their own printed material and other supplies for each training, as applicable.
- 5.9.10 Arrange technology resources for each training but may use Commission technology if the Commission agrees to such accommodations.
- 5.9.11 Report all instructions for Commission designee to attend in-person/live-streamed courses.
- 5.9.12 Report on effectiveness of each element and plans for adjusting as needed to ensure most effective avenues are being utilized.
- 5.9.13 Participate in end-of-program, one-on-one, meeting with Commission designee.
- 5.9.14 Develop recommendations for future phases and iterations of the program.
- 5.9.15 Conduct mid-program check-in with participants and develop a report to be delivered to the Commission at one-on-one meeting with Commission designee.
- 5.9.16 Report and coordinate all program press inquiries with the Press Secretary, [Press@CCCMass.com](mailto:Press@CCCMass.com).
- 5.10 Performance Monitoring and Evaluation. To ensure progress toward the goals of the SEP through Services, each course delivered by the Contractor shall be subject to evaluations to assess their delivery method, as well as the quality, applicability, and effectiveness of the curriculum/content, as described in this Section 5.10.
  - 5.10.1 Each evaluation will consist of an instructor evaluation, course evaluation, and use of technology.

- 5.10.1.1 Instructor evaluations will include teaching methods, demonstrated expertise of knowledge, engagement with participants, cultural competency, demonstrated understanding of social equity, etc.
- 5.10.1.2 Course evaluations will include accessibility of content, application of course goals and objectives, participant engagement, and content delivery, etc.
- 5.10.1.3 Technology evaluations will include effective use of technology features within various online learning management systems, distribution of materials, accessibility of webinars/live sessions, etc.
- 5.10.2 Evaluation rankings will be conducted using a 1-5 point Rensis Likert scale.
- 5.10.3 Evaluations will be conducted by both (i) SEP participants and (ii) the Commission's Point of Contact/Contract manager or their designee.
  - 5.10.3.1 The Commission shall request evaluations from each SEP participant upon conclusion of the course. The Commission will calculate the average of the scores submitted by each SEP participant (**Participant Score**).
  - 5.10.3.2 The Commission's point of Contact/Project manager, or their delegate, shall review recordings of all courses and complete an evaluation (**Commission Score**).
  - 5.10.3.3 The Commission will calculate the average of the Participant Score and Commission Score to determine the score used to evaluate the Contractor's performance with respect to each Course (**Final Score**).
- 5.10.4 Contractors shall maintain a Final Score of 3.75 or greater for each Course.
- 5.10.5 If the Final Score for any course drops below 3.75, Contractor shall attend a performance discussion with the Commission's Point of Contact/Project Manager to develop an informal plan to address the unsatisfactory rating.
- 5.10.6 If the Final Score drops below 3.75 for any two courses within the same contract year, Contractor shall attend a performance discussion with the Commission's Project Manager to develop a formal written correction plan.
- 5.10.7 If the Final Score drops below 3.75 for any three courses within the same contract year, Contractor shall be required to obtain, at its own cost, training to address the deficiencies resulting in the unsatisfactory Final Score.

- 5.10.8 If the Final Score drops below 3.75 for any four courses within the same contract year or the Contractor cannot complete the training required under Section 5.10.7 prior to the expected date of the next course to be taught by the Contractor, the Commission shall, in its sole discretion, have the option to reschedule the course or engage a different contractor to teach the course. The Contractor shall be responsible for paying any additional cost incurred by the Commission in engaging another contractor to teach a course above the amount identified in Table 3 for that course.

**[THIS TABLE 2 IS A SAMPLE FOR PURPOSES OF THE RFR AND WILL BE MODIFIED FOR EACH CONTRACTOR TO REFLECT THE APPLICABLE COURSES.]**

TABLE 2  
DELIVERABLES

Deliverable or Task Name	Deliverable or Task Number	Description and Metrics of Acceptance	Milestone Schedule (Due Date)
<b>Attend Orientation</b>	1	<b>Attend Orientation</b> (virtual)	
<b>Business Plan Creation &amp; Development</b>  [Universal Course Merged w/ Ancillary Track]	1a	<b>Deliverables due to the Commission</b> (See Section 5.6 <i>Requirements for deliverables due to the Commission</i> )	
	1b	<b>Upload to LMS</b> (See Section 5.7 <i>Requirements for the Learning Management System (LMS)</i> )	
	1c	<b>Course available to participants on LMS</b> (See Section 5.7 <i>Requirements for the Learning Management System (LMS)</i> )	
	1d	<b>Teach course in-person</b> or live streamed (See Section 5.8 <i>Requirements for the in-person course</i> )  Contractor will design the course to accommodate: 1) those who have started a business plan and 2) those who have not.	TBD by Contractor





Deliverable or Task Name	Deliverable or Task Number	Description and Metrics of Acceptance	Milestone Schedule (Due Date)
		All Universal Courses are <b>mandatory</b> for Entrepreneur & Core participants and optional to Entry & Ancillary. Except 5.5.1. which will be a merged Ancillary Course.	
<b>Raising Capital in the Cannabis Industry</b>  [Universal Course]	2a	<b>Deliverables due to the Commission</b> (See Section 5.6 <i>Requirements for deliverables due to the Commission</i> )	
	2b	<b>Upload to LMS</b> (See Section 5.7 <i>Requirements for the Learning Management System (LMS)</i> )	
	2c	<b>Course available to participants on LMS</b> (See Section 5.7 <i>Requirements for the Learning Management System (LMS)</i> )	
	2d	<b>Teach course in-person</b> or live streamed (See Section 5.8 <i>Requirements for the in-person course</i> )	TBD by Contractor

## 6. ACCEPTANCE OR REJECTION PROCESS

A Deliverable will be considered “completed” when the Commission has determined that the acceptance criteria for that specific Deliverable have been met as specified in Table 2 of this SOW, in accordance with the following process:

- 6.1 Contractor shall complete Tasks associated with a Deliverable and submit the required Deliverables to the Commission’s Point of Contact/Project Manager for approval and acceptance. The Commission will review the work product for each of the Deliverables and evaluate whether the Deliverable has clearly met, in all material respects, the criteria established in this SOW. Once reviewed and favorably evaluated, the Deliverable will be deemed accepted.
- 6.2 Within fifteen (15) business days of completion of a Task or receipt of each Deliverable, the Commission’s Point of Contact will notify Contractor’s Point of Contact, in writing,



of the acceptance or rejection of said Task or Deliverable.

- 6.3 Any rejection will include a written description of the defects of the Task or Deliverable, which may include, without limitation, incomplete Tasks associated with the Deliverable, timeliness of delivery, or any violation of obligations under this SOW.
- 6.4 If the Commission does not respond to the submission of the Deliverable within five (20) working days of the Commission's receipt of each Deliverable, Contractor shall provide a reminder notice to the Commission's Point of Contact.
- 6.5 If the Commission fails to reject a Deliverable within ten (10) business days after the Commission's receipt of the reminder notice, the Deliverable shall be deemed accepted.
- 6.6 If the Commission rejects a Deliverable, Contractor will, upon receipt of such rejection, act promptly and diligently to correct the specified defects and deliver an updated version of the Deliverable to the Commission. The Commission will then have an additional fifteen (15) business days from receipt of the updated Deliverable to notify Contractor, in writing, of the acceptance or rejection of the updated Deliverable. Any such rejections will include a description of the way in which the updated Deliverable fails to correct the previously reported deficiency.

## 7. PAYMENT TERMS

- 7.1 All payments under this Agreement shall be made for accepted Tasks and Deliverables in accordance with the Commonwealth's bill paying policy. Contractor will perform its Services on a fixed fee basis for fixed capacity of eight (8) weeks of work performed by the project team identified in Table 1. Based on the terms set forth in this SOW, Contractor's fees for its Services will be \$285,000.

***[THIS TABLE 3 IS A SAMPLE FOR PURPOSES OF THE RFR AND WILL BE MODIFIED FOR EACH CONTRACTOR TO REFLECT THE APPLICABLE COURSES.]***

TABLE 3

### Fixed Price Deliverables and Tasks



<b>Deliverable or Task Number</b>	<b>Deliverable or Task Name</b>	<b>Milestone Payment</b>
1 – 1d	Business Plan Creation & Development (Universal Course merged w/ Ancillary Track)	
2a – 2d	Raising Capital in the Cannabis Industry (Universal Course)	
3a – 3d	Ancillary Facility Design (Ancillary Track)	
Total		\$

- 7.2 Invoices. Contractor shall provide the Commission with an invoice for completed and accepted Deliverables in accordance with the fees established in Table 3. The Commission shall not pay for incomplete Deliverables. The invoice shall be submitted electronically to Adriana León, Chief Financial & Accounting Officer, and May Nguyen, Fiscal Specialist, at Finance@CCCMass.com.
- 7.3 Absent advance written approval from the Commission’s Project Manager, the Executive Director, or their designee, Contractor will not be reimbursed for any expenses not included in the fixed price for Deliverables as set forth in Table 3.
- 7.4 Liquidated Damages.
- 7.4.1 The parties acknowledge that untimely or prolonged unsatisfactory performance of Tasks and Deliverables shall cause the Commission injury and damage.
- 7.4.2 The parties acknowledge that such injury and damage would be in the form of compromised experience by SEP participants and the diversion of Commission resources to offset untimely or poor performance, the value of which may be difficult to calculate.
- 7.4.3 The parties agree that, for the purposes of this Section 7.4, the Contractor will be deemed to have breached this Agreement, triggering liquidated damages, if (i) the Commission rejects a Deliverable, in good faith, three times or (ii) the Contractor, without prior written approval by the Commission’s Point of



Contact/Project Manager, submits a Deliverable or completes a Task associated with a Deliverable more than two business days after the milestone date identified in Table 2.

- 7.4.4 In the event of a breach described in Section 7.4.3, the Commission shall have the exclusive remedy of damages in the amount of 10% of the Milestone Payment identified in Table 3 for the Deliverable, which shall be deducted from the invoice for that Deliverable.
- 7.4.5 The parties agree and acknowledge that the liquidate damages amount identified in Section 7.4.4 is intended to be a fair estimate of the actual damages suffered in the event of a breach described in Section 7.4.3.

### 13. DATA SECURITY

- 13.1.1 As part of providing the Services under this SOW, Contractor will be required to use electronic data and information provided by the Commission to Contractor, which may physically reside at or on the Commission or Contractor's premises, information systems, the LMS, or other equipment owned and/or controlled by either the Commission or Contractor (**Commission Data**). Contractor may be required to have access to personal data under M.G.L. c. 66A and/or personal information under M.G.L. c. 93H (collectively, **Personal Information**), or to work on or with information technology systems that contain Personal Information, including, without limitation, the LMS. Personal Information shall be included in the definition of Commission Data.
- 13.1.2 Data Safeguards. In addition to the security requirements in the Agreement, Contractor must comply with the EOTTS Enterprise Information Security Policy and implement commercially reasonable safeguards necessary to prevent (i) unauthorized access to Commission Data from any public or private network; (ii) physical access to any information technology resources involved in providing the Services; (iii) interception and manipulation of Commonwealth Data during transmission to and from Contractor; and (iv) any compromise in the security, confidentiality, and integrity of Commission Data and Personal Information. Contractor shall encrypt Commission Data in transit and at rest.
- 13.1.3 Commonwealth Data must be partitioned from other information and data in Contractor's possession in such a manner that access to it will not be impacted or forfeited due to e-discovery, search and seizure, or other actions by third parties obtaining or attempting to obtain access to Contractor's records, information, or



data for reasons or activities that are not directly related to the Commission's business.

- 13.1.4 In the event of any breach of security that results in the unauthorized disclosure of Commission Data or Contractor's obligations under this Section 8, or any evidence that leads Contractor to reasonably believe that such a breach is imminent, Contractor will (and in no event more than twenty-four hours after discovering such breach) notify Commission. Contractor shall identify the affected Commission Confidential Information and inform the Commission of the actions Contractor has taken or will take to reduce the risk of further loss to Commission and mitigate the damage caused by the breach. Contractor will provide the Commission the opportunity to participate in the investigation of the breach and to exercise control over reporting the unauthorized disclosure, to the extent permitted by law.
- 13.1.5 In the event that a breach of Commission Data includes Personal Information Contractor shall be responsible for providing breach notification to the Commission and pay reasonable costs to assist that Commission in providing notice to data owners in coordination with Commission and the Commonwealth of Massachusetts as required by M.G.L. c. 93H or other applicable law or policy.

#### **14. REPRESENTATIONS, WARRANTIES, AND COVENANTS**

Contractor acknowledges that it occupies a position of trust and confidence with respect to the Commission's SEP and SEP participants and (ii) makes the following representations, warranties, and covenants regarding its performance of the Agreement.

- 14.1 Related Project Knowledge. Contractor shall, prior to commencing the Services, become familiar with the Commission's governing laws and guidance documents, electronic licensing systems, including, without limitation, M.G.L. cc. 94G and 94I, 935 CMR 500.000 and 501.000, as each is currently in effect and as amended from time to time, and any other materials identified by the Commission's Point of Contact. Contractor shall also become familiar and comply with all Massachusetts and Federal laws with respect to protecting Personal Information.
- 14.2 Confidential Information.
  - 14.2.1 Contractor shall not, surviving the termination of this Agreement, discuss or disclose Confidential Information with any person or entity other than as



necessary to carry out its duties relative to the Agreement or in compliance with applicable law, without first obtaining the Commission's consent. The foregoing obligation not to disclose Confidential Information shall not apply to disclosures required by law, government rule or regulation, or judicial or administrative process; provided, however, that if Contractor shall be required to make such a disclosure, Contractor shall notify the Commission as promptly as possible (and, if possible, prior to making such disclosure) so that the Commission may seek confidential treatment or protection of the disclosed Confidential Information.

14.2.2 Contractor shall take all reasonable precautions to prevent inadvertent disclosure of Confidential Information, including, without limitation, disclosing that any similarity exists between Confidential Information and information independently developed by another person or entity, and

14.2.3 Surviving termination of this Agreement, Contractor shall take all reasonable precautions to prevent inadvertent or unauthorized access, use, copying, destruction, modification, disclosure, or transfer of Confidential Information. This prohibition against the use, copying, or transfer includes, without limitation, selling, licensing, or otherwise exploiting, directly or indirectly, any products or services (including software in any form) that embody or are derived from Confidential Information.

14.2.4 Upon termination of this Agreement, Contractor will return to the Commission all Confidential Information conceived of or made by Contractor, solely or jointly with others, pursuant to this Agreement.

14.2.5 Upon Termination of this Agreement, Contractor will return to the Commission all items that relate to or are derived (in whole or in part) from Confidential Information conceived or made by Contractor, solely or jointly with others.

14.3 Public Records. Contractor acknowledges that that all information, materials, and work product will be subject to Massachusetts Public Records Law, M.G.L. c. 66 (the **PRL**), and the Commission may disclose records made by or received from Contractor, in response to a request made under the PRL. Unless the requested record is exempt under PRL, or specifically or by necessary implication exempted from disclosure by statute, the record may be made available to the public.

14.4 Developments are Property of the Commission. Contractor acknowledges all confidential, proprietary or other trade secret information and all other works of authorship,



trademarks, trade names, discoveries, inventions, processes, methods and improvements, conceived, developed, or otherwise made by Contractor or its Key Personnel, alone or with others, and in any way relating to the Commission or the Services, whether or not patentable or subject to copyright protection and whether or not reduced to tangible form or reduced to practice during the period of your assignment with the Commonwealth (**Developments**) shall be the sole property of the Commission. All materials submitted by Contractor become the property of the Commonwealth of Massachusetts and the Commission and will not be returned. The Commission reserves the right to use any ideas, concepts, or configurations that are presented. All copyrightable material contained within a Development produced in the course of providing the Services are works made for hire. Contractor bears the burden to prove that a work was not made during the period of its assignment with the Commission. If a work is determined to not be made for hire or that designation is not sufficient to secure rights, to the fullest extent allowable and for the full term of protection otherwise accorded to Contractor under such law, Contractor shall and hereby irrevocably does, assign and transfer to the Commission free from all liens and other encumbrances or restrictions, all right, title and interest Contractor may have or come to have in and to such Development. CONTRACTOR HEREBY WAIVE IN FAVOR OF THE COMMISSION ANY AND ALL ARTIST'S OR MORAL RIGHTS (INCLUDING, WITHOUT LIMITATION, ALL RIGHTS OF INTEGRITY AND ATTRIBUTION) YOU MAY HAVE PURSUANT TO ANY STATE OR FEDERAL LAWS OF THE UNITED STATES IN RESPECT TO ANY DEVELOPMENT AND ALL SIMILAR RIGHTS UNDER THE LAWS OF ALL OTHER APPLICABLE JURISDICTIONS. Contractor agrees to disclose all Developments promptly, fully, and in writing to the Commission promptly after development of the same, and at any time upon request. Contractor agrees to, and hereby does assign to the Commission all its right, title, and interest throughout the world in and to all Developments without any obligation on the part of the Commission to pay royalties or any other consideration to Contractor in respect of such Developments. Contractor Agrees to execute such documents and take such actions as the Commission reasonably requests with respect to "works for hire" for the purpose of vesting, confirming, securing, or assigning the Commission's right(s), title(s), and interest(s) in Deliverables, including patents and copyrights relating thereto in the United States and foreign territories.

#### 14.5 Conflicts, Disclosures.

14.5.1 Within five (5) business days of the execution of this SOW, Contractor shall disclose in writing to the Commission's Point of Contact/Project Manager any and all existing interest in or relationship with any Marijuana Establishment or Medical Marijuana Treatment Center applicant or licensee (collectively,



**Licenseses)** it or any Key Personnel has.

- 14.5.2** During the Term and prior to Contractor or any of its Key Personnel establishing any new interest in or relationship with a Licensee, regardless of whether such interest would make Contractor an applicant or licensee, Contractor shall make a written disclosure to the Commission's Project Manager of the potential interest or relationship.
- 14.5.3** During the Term, and for six months thereafter, Contractor and Key Personnel shall not initiate or target communications with any SEP participant to solicit any private business relationship or engage in any private business dealings, regardless of whether or not such relationship or dealing would result in Contractor being an Owner, as defined in 935 CMR 500.002 and 501.002.
- 14.5.4** If an SEP participant initiates or solicits a private business relationship or business dealing with, Contractor may accept, provided, however, Contractor shall be required to disclose such private business relationship or dealing with the Commission's Point of Contact/Project Manager prior to accepting. Vendor shall affirm in such disclosure that the SEP participant approached the Vendor, and Vendor did not initiate the private business relationship.
- 14.5.5** During the Term, Contractor or its agents shall not appear before the Commission to engage in any act to promote, oppose, influence, or attempt to influence the policy decisions of any Commissioner or employee of the Commission, on its own or through SEP participants, unless otherwise agreed upon by the Commission. This Section 9.5.5 shall not prohibit Contractor or its agents from participating in ordinary public comment processes as members of the public.
- 14.5.6** During the Term, and for six months thereafter, the Contractor, including its subsidiaries and affiliates, and Key Personnel may not receive or solicit monetary donations in connection with a Licensee's Positive Impact or Diversity Plans.
- 14.5.7** During specific times when Contractor or its Key Personnel is delivering the Services to SEP participants (e.g. presenting, instructing, or teaching any other classes of individuals deemed eligible to participate in the training program, including one-on-one discussion with participants), Contractor and its Key Personnel shall not engage in private business activities outside of the scope of this Agreement, including but not limited to, marketing and promotion of its private business interests.





14.5.8 Contractor and its Key Personnel shall not act as a representative of the Commission, and shall overtly disclaim that Contractor or Key Personnel has any special knowledge or insight into Commission practices, policy, or enforcement of its regulations. Contractor and its Key Personnel shall not, and shall decline to, comment, opine, or speculate on the compliance or practices of a particular individual or entity licensed by the Commission.

***[The remainder of this page is intentionally left blank. The signature page follows.]***



The undersigned hereby represent that they are duly authorized to execute this SOW on behalf of their respective organizations.

**CANNABIS CONTROL  
COMMISSION**

**CONTRACTOR**

---

**Adriana León**

**Chief Finance & Accounting Officer**

---

**Date:**

---

**Name:**

**Title:**

---

**Date:**



## 13 APPENDIX 6 – TEMPLATE INTELLECTUAL PROPERTY AND WORK EFFORT AGREEMENT IPWEA

### **Intellectual Property and Work Effort Agreement for Contractor’s Employees, Consultants, and Agents**

#### **Confidentiality, Assignment of Inventions and Representation of Non-Infringement Agreement; Other Representations**

The undersigned, being an employee of or consultant to the following contractor of the Commonwealth of Massachusetts:

Name of Contractor: \_\_\_\_\_ (“Contractor”)

desires to be assigned by the Contractor to perform services for the Commonwealth, and that the Contractor desires to assign you to perform services on one or more projects for the Commonwealth, but only under the condition that you sign this Intellectual Property and Work Effort Agreement (IPWEA) and agree to be bound by all of its terms and conditions.

NOW THEREFORE, in consideration of your assignment to work for the Commonwealth, the access you have to the confidential information of the Commonwealth, and for other good and valuable consideration, the parties agree as follows:

1. Confidentiality of the Commonwealth’s Materials. You agree that both during your assignment at the Commonwealth and thereafter you will not use for your own benefit, or divulge or disclose to anyone except to persons within the Commonwealth whose positions require them to know it, any information not already lawfully available to the public concerning the Commonwealth (“Confidential Information”), including but not limited to information regarding any website of the Commonwealth, any e-commerce products or services, any web development strategy, any financial information or any information regarding users of or Contractors to the Commonwealth’s websites. Confidential Information also includes, without limitation, any technical data, design, pattern, formula, computer program, source code, object code, algorithm, subroutine, manual, product specification, or plan for a new, revised or existing product or web site; any business, marketing, financial or sales information; and the present or future plans of the Commonwealth with respect to the development of its web sites and web services.
2. All Developments the Property of the Commonwealth. All confidential, proprietary, or other trade secret information and all other works of authorship, trademarks, trade names, discoveries,



inventions, processes, methods and improvements, conceived, developed, or otherwise made by you, alone or with others, and in any way relating to the Commonwealth or any of its web development projects, whether or not patentable or subject to copyright protection and whether or not reduced to tangible form or reduced to practice during the period of your assignment with the Commonwealth (“Developments”) shall be the sole property of the Contractor’s customer, the Commonwealth. All copyrightable material contained within a Development during the period of your assignment with the Commonwealth are works made for hire. You bear the burden to prove that a work was not made during the period of your assignment with the Commonwealth. If a work is determined to not be made for hire or that designation is not sufficient to secure rights, to the fullest extent allowable and for the full term of protection otherwise accorded to you under such law, you shall and hereby irrevocably do, assign and transfer to the Commonwealth free from all liens and other encumbrances or restrictions, all right, title and interest you may have or come to have in and to such Development. YOU HEREBY WAIVE IN FAVOR OF THE COMMONWEALTH ANY AND ALL ARTIST’S OR MORAL RIGHTS (INCLUDING, WITHOUT LIMITATION, ALL RIGHTS OF INTEGRITY AND ATTRIBUTION) YOU MAY HAVE PURSUANT TO ANY STATE OR FEDERAL LAWS OF THE UNITED STATES IN RESPECT TO ANY DELIVERABLE AND ALL SIMILAR RIGHTS UNDER THE LAWS OF ALL OTHER APPLICABLE JURISDICTIONS. You agree to disclose all Developments promptly, fully, and in writing to the Commonwealth promptly after development of the same, and at any time upon request. You agree to, and hereby do, assign to the Commonwealth all your right, title, and interest throughout the world in and to all Developments without any obligation on the part of the Commonwealth to pay royalties or any other consideration to you in respect of such Developments. You agree to assist the Contractor’s customer the Commonwealth, (without charge, but at no cost to you) to obtain and maintain for itself such rights.

3. Return of the Commonwealth’s Materials. At the time of the termination of your assignment with the Commonwealth, you agree to return to the Commonwealth all Commonwealth materials, documents and property, in your possession or control, including without limitation, all materials relating to work done while assigned by the Contractor to projects for Commonwealth or relating to the processes and materials of the Commonwealth. You also agree to return to the Commonwealth all materials concerning past, present and future or potential products and/or services of the Commonwealth. You also agree to return to the Commonwealth all materials provided by persons doing business with the Commonwealth and all teaching materials provided by the Commonwealth.
4. Representation of Non-Infringement. You hereby represent and warrant that, to your best knowledge, no software, no web content and no other intellectual property that you develop during your assignment to and deliver to the Commonwealth, and no Developments made by you



and assigned to the Commonwealth pursuant to Section 2 above, shall infringe a patent, copyright, trade secret or other proprietary or intellectual property right of any third party.

5. No Conflicting Agreements. You represent and warrant that you are not a party to any agreement or arrangement which would constitute a conflict of interest with the obligations undertaken hereunder or would prevent you from carrying out your obligations hereunder.
6. Tax Payments. You hereby represent and warrant that you have paid all due state and federal taxes, or, if your tax status is in dispute or in the process of settlement, that you have responded as directed and within the required timeframes to all communications received from the state or federal government.
7. You acknowledge that you are not an employee of any Massachusetts state or municipal government agency, and are not entitled to any benefits, guarantees or other rights granted to state or municipal government agencies, including but not limited to group insurance, disability insurance, paid vacations, sick leave or other leave, retirements plans, health plans, or premium overtime pay. Should you be deemed to be entitled to receive any such benefits by operation of law or otherwise, you expressly waive any claim or entitlement to receiving such benefits from Massachusetts state or municipal government agencies.
8. Miscellaneous:
  - a. The Commonwealth is a third party beneficiary of this IPWEA between you and Contractor with full rights to enforce its terms directly.
  - b. This IPWEA contains the entire agreement between the parties with respect to the subject matter hereof, superseding any previous oral or written agreements.
  - c. Your obligations under this IPWEA shall survive the termination of your assignment with the Commonwealth regardless of the manner of or reasons for such termination. Your obligations under this IPWEA shall be binding upon and shall inure to the benefits of the heirs, assigns, executors, administrators, and representatives of the parties.
  - d. You agree that the terms of this IPWEA are reasonable and properly required for the adequate protection of our customer the Commonwealth's legitimate business interests. You agree that in the event that any of the provisions of this IPWEA are determined by a court of competent jurisdiction to be contrary to any applicable statute, law, rule, or policy or for any reason unenforceable as written, then such court may modify any of such provisions so as to permit enforcement thereof to the maximum extent permissible as thus modified. Further, you agree that any finding by a court of competent jurisdiction that any provision of this IPWEA is contrary to any applicable statute, law, or policy or



for any reason unenforceable as written shall have no effect upon any other provisions and all other provisions shall remain in full force and effect.

- e. You agree that any breach of this IPWEA will cause immediate and irreparable harm to the Contractor's customer the Commonwealth not compensable by monetary damages and that the Commonwealth will be entitled to obtain injunctive relief, in addition to all other relief, in any court of competent jurisdiction, to enforce the terms of this IPWEA, without having to prove or show any actual damage to the Commonwealth.
- f. No failure to insist upon strict compliance with any of the terms, covenants, or conditions hereof, and no delay or omission in exercising any right under this IPWEA, will operate as a waiver of such terms, covenants, conditions, or rights. A waiver or consent given on any one occasion is effective only in that instance and will not be construed as a bar to or waiver of any right on any other occasion.
- g. This IPWEA shall be governed by and construed in accordance with the laws of the Commonwealth of Massachusetts, without regard to the doctrine of conflicts of law. This IPWEA is executed under seal.

The undersigned believes that this IPWEA imposes reasonable standards of conduct for all of the employees, consultants, and agents of the Contractor on assignment at the Commonwealth, and that this IPWEA will serve to best protect the interests of all involved parties. If you agree with the terms set forth herein, please sign and return this IPWEA.

Agreed and Accepted:

<b>Name of Employee, Consultant, or Agent</b>	
<b>Signature</b>	
<b>Date</b>	
<b>Name of Contractor</b>	
<b>Contractor Signature</b>	
<b>Contractor Signatory Name</b>	



<b>Contractor Signatory Title</b>	
<b>Contractor Signature Date</b>	



# Cannabis Control Commission

## Monthly Public Meeting

April 16, 2021 at 10:00 a.m. via Microsoft Teams Live



# Agenda

1. Call to Order
2. Chairman's Comments and Updates
3. Minutes for Approval
4. Executive Director's Report
5. Staff Recommendations on Changes of Ownership
6. Staff Recommendations on Renewals
7. Staff Recommendations on Final Licenses
8. Staff Recommendations on Provisional Licenses
9. Commission Discussion and Votes
10. New Business that the Chair did not Anticipate at the Time of Posting
11. Next Meeting Date
12. Adjournment



# Executive Director's Report

# Highlights from Licensing Data\*

- 12 applications awaiting first review
- 19 applications for staff consideration
- 21 applications awaiting 3<sup>rd</sup> party responses
- 39 applications awaiting supplemental review
- 96,649 certified active patients
- 281 expedited applications

\*Additional data available at the end of slide presentation



## Licensing Applications | April 16, 2021

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

Type	#
Pending	232
Withdrawn	820
Incomplete (Less than 4 packets submitted)	6,552
Denied	4
Approved: Delivery-Only Pre-Certification	62
Approved: Licenses	794
Total	8,464

## Licensing Applications | April 16, 2021

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

Type	#
Craft Marijuana Cooperative	1
Delivery-Only Provisional License	7
Independent Testing Laboratory	11
Marijuana Cultivator	242
Marijuana Microbusiness	17
Marijuana Product Manufacturer	184
Marijuana Research Facility	0
Marijuana Retailer	323
Marijuana Third Party Transporter	4
Marijuana Transporter with Other Existing ME License	5
<b>Total</b>	<b>794</b>



## Licensing Applications | April 16, 2021

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

Type	#
Pre-Certified/Delivery Endorsement Microbusiness	62
Provisionally Approved	93
Provisional License	440
Final License	38
Commence Operations	223
<b>Total</b>	<b>856</b>

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

## Licensing Applications | April 16, 2021

Status	#
Application Submitted: Awaiting Review	12
Application Reviewed: More Information Requested	180
Application Deemed Complete: Awaiting 3 <sup>rd</sup> Party Responses	21
All Information Received: Awaiting Staff Recommendation	19
Applications Considered by Commission ( <i>includes Delivery Pre-Cert</i> )	860
<b>Total</b>	<b>1,092</b>



## Licensing Applications | April 16, 2021

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

The 1,092 applications represent 614 separate entities

Type	#
MTC Priority	259
Economic Empowerment Priority	64
Expedited Review	281
General Applicant	488
Total	1,092

Expedited Applications	
Expedited: License Type	46
Expedited: Social Equity Participant	94
Expedited: Disadvantaged Business Enterprise	115
Expedited: Two or More Categories	26
Total	281



## Licensing Applications | April 16, 2021

*Of 856 applications approved by the Commission, the following applications have Economic Empowerment Priority Review, Social Equity Program Participant, and/or Disadvantaged Business Enterprise status. Please note, applicants may hold one or more statuses.*

Type	Economic Empowerment	Social Equity Program	Disadvantaged Business Enterprise
Pre-Certified/Delivery Endorsed Microbusiness	18	47	7
Provisionally Approved	7	14	31
Provisional License	12	25	61
Final License	0	1	3
Commence Operations	4	4	17
<b>Total</b>	<b>41</b>	<b>91</b>	<b>119</b>

## MMJ Licensing Data | April 16, 2021

MTC License Applications	#
Pending-Application of Intent Stage	0
Pending-Management and Operations Profile Stage	0
Pending-Siting Profile Stage	3
Application Expired	150
Application Withdrawn	3
<b>Total</b>	<b>156</b>

MTC Licenses	#
Provisional	54
Final	7
Commence Operations	79
License Expired	37
<b>Total</b>	<b>156</b>

\* Additional data available at the end of slide presentation

# Hiring Update

## Press Secretary

- Final candidate selected.

## Director of Equity Programming and Community Outreach

- First round interviews.

## Chief Technology & Innovation Officer

- Interviews completed.



# Hiring Update

## Investigations and Enforcement

- Posting for Investigators closed on March 31<sup>st</sup>
  - Received more than 200 applicants; screening applicants.
- Posting for Licensing Specialists closed on March 31<sup>st</sup>
  - Received more than 60 applicants; screening applicants.
- Investigations and Enforcement Internal Promotions
  - Investigations Managers
  - Licensing Manager

## HR/Operations Project Coordinator

- Coordinator started March 29



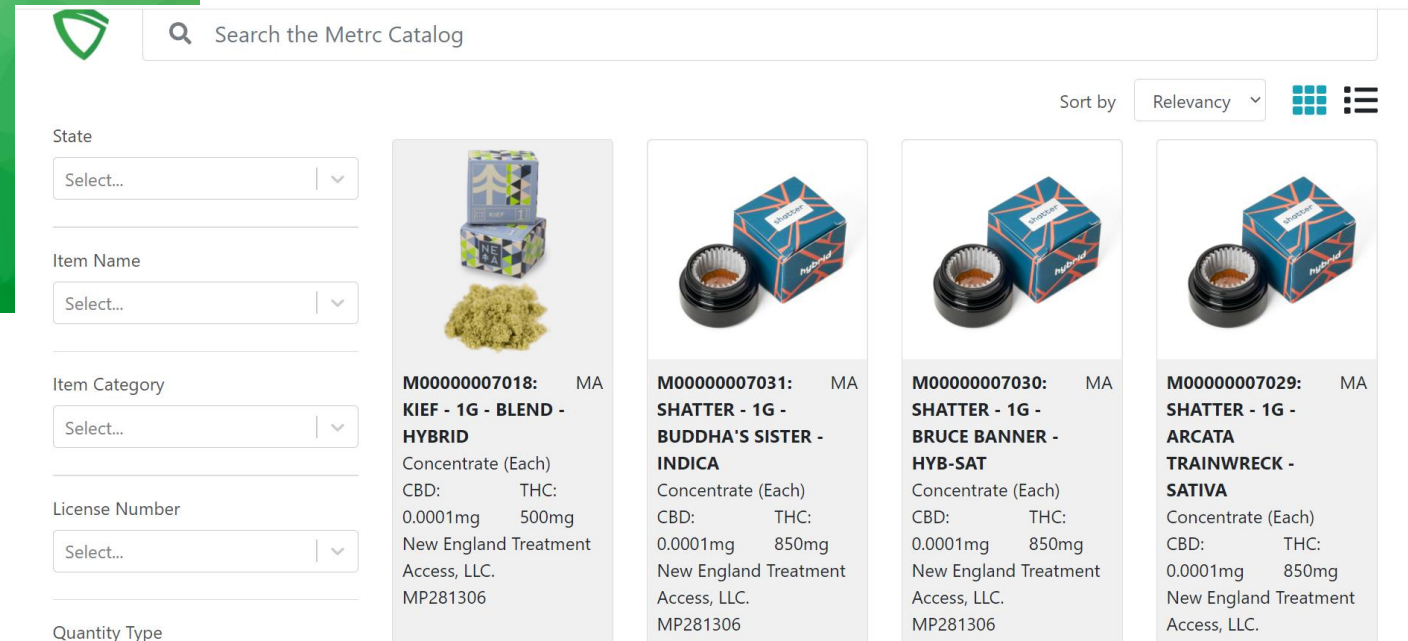
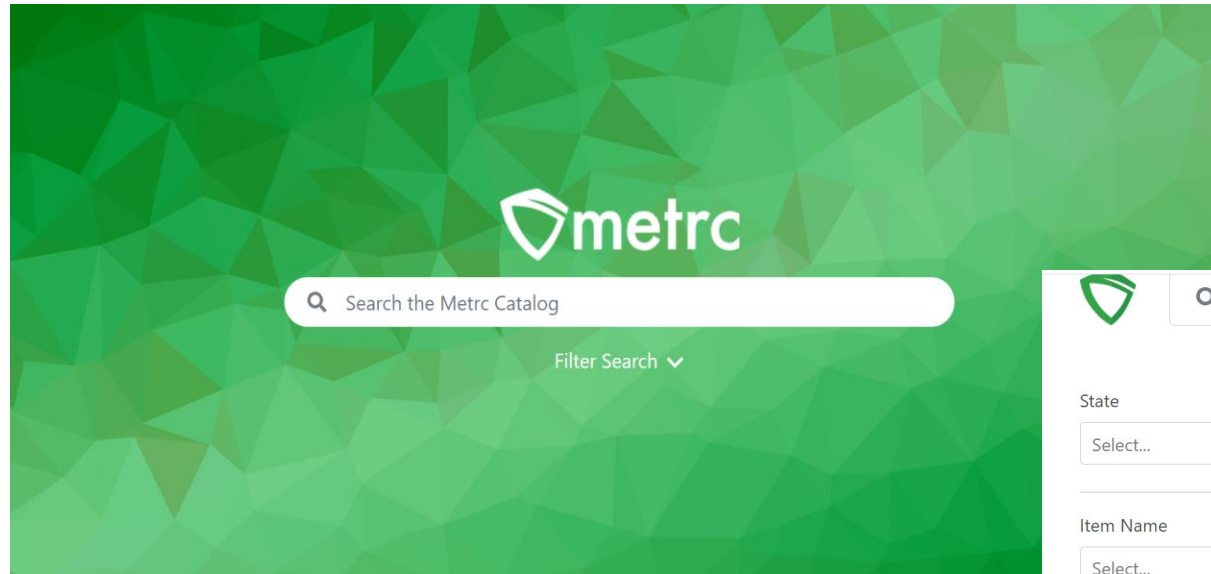
# Product Catalog

- Launched Monday, April 12<sup>th</sup>
- Offer key public stakeholders important product information:
  - Law Enforcement
  - Parents / Educators
  - Medical Professionals
  - Patients
  - Researchers/ Policymakers
  - General Public
- First of its kind in the nation.



# Product Catalog

Search to find product names, ingredients, manufacturer, potency level, and photographs

A screenshot of the Metrc product catalog interface. It shows a search bar at the top with the text "Search the Metrc Catalog". Below the search bar are several filter options: "State" (a dropdown menu), "Item Name" (a dropdown menu), "Item Category" (a dropdown menu), "License Number" (a dropdown menu), and "Quantity Type". To the right of the filters is a "Sort by" dropdown menu set to "Relevancy". Below the filters and sort options are four product listings. Each listing includes a photograph of the product, a product ID, a name, a category, and potency information (CBD and THC).

Product ID	Name	Category	CBD	THC	Manufacturer
M00000007018	KIEF - 1G - BLEND - HYBRID	Concentrate (Each)	0.0001mg	500mg	New England Treatment Access, LLC.
M00000007031	SHATTER - 1G - BUDDHA'S SISTER - INDICA	Concentrate (Each)	0.0001mg	850mg	New England Treatment Access, LLC.
M00000007030	SHATTER - 1G - BRUCE BANNER - HYB-SAT	Concentrate (Each)	0.0001mg	850mg	New England Treatment Access, LLC.
M00000007029	SHATTER - 1G - ARCATA TRAINWRECK - SATIVA	Concentrate (Each)	0.0001mg	850mg	New England Treatment Access, LLC.



# Social Equity Program Update

- Academic partnerships
- Mentorship tracker
- Procurements (Connector App RFI, Third Cohort RFR)
- 3-Year Strategic Plan
- Cohort Three



# Update on Hemp Products

- December 2020 – FY 2021 Budget signed into law; included the following amendment:

SECTION 37. Section 12 of chapter 94G of the General Laws, as so appearing, is hereby amended by inserting after the word “chapter”, in line 36, the following words:- or any hemp and hemp products cultivated and manufactured in compliance with a license from the department of agricultural resources pursuant to chapter 128 and is in compliance with regulations set forth by the United States Department of Agriculture.

- Commission / MDAR collaborating to implement the law and assess regulatory challenges.






# Disproportionate Impact Study: Update

- DIA report Q&A
- Impacted policies
- External stakeholder engagement
- Public Comment Period
- DEI workgroup – *Access & Equity*





# Staff Recommendations on Licensure



# Staff Recommendations: Changes of Ownership

- a. Beacon Compassion, Inc.
- b. Commonwealth Alternative Care, Inc.
- c. Commonwealth Cultivation, Inc.
- d. Debilitating Medical Condition Treatment Centers, Inc.
- e. Heal, Inc.
- f. Liberty Compassion, Inc.
- g. New England Treatment Access, LLC



# Staff Recommendations: Renewals

- a. ARL Healthcare, Inc. (#MCR139983)
- b. ARL Healthcare, Inc. (#MPR243597)
- c. ARL Healthcare, Inc. (#MRR205712)
- d. Beacon Compassion, Inc. (#MCR139982)
- e. Beacon Compassion, Inc. (#MPR243596)
- f. Buds Goods & Provisions Corp. (#MRR205736)
- g. Buds Goods & Provisions Corp. (#MRR205723)
- h. Canna 11 Holyoke, LLC (#MCR139965)
- i. Cape Cod Grow Labs, LLC (#MCR139965)
- j. Cape Cod Grow Labs, LLC (#MPR243584)
- k. CTDW LLC (#MRR205713)
- l. Cultivate Leicester, Inc (#MRR205717)
- m. Eagle Eyes Transport, Inc (#MTR263099)
- n. EOS-Bittersweet LLC (#MCR139987)
- o. Fernway LLC (#MPR243600)
- p. Gaul Greenery LLC (#MRR205699)
- q. Ganesh Wellness Inc. (#MPR243592)
- r. Ganesh Wellness Inc. (#MRR205710)
- s. Garden Wonders, Inc (#MRR205707)
- t. Green Meadows Farm, LLC (#MRR205725)
- u. Green Stratus Corp (#MRR205722)
- v. Grow Team Gardens LLC (#MBR169271)
- w. Harvest of Worcester (#MRR205709)
- x. Heal Provincetown, Inc (#MRR205719)
- y. Hennep, Inc. (#MRR205730)
- z. High Hawk Farm LLC (#MCR139975)
- aa. Highminded LLC (#MPR243587)
- bb. Highminded LLC (#MRR205703)
- cc. Hudson Botanical Processing, LLC (#MPR243588)
- dd. Humboldtcast LLC (#MCR139977)
- ee. In Good Health Inc. (#MRR205711)
- ff. Mantis Management Group (#MPR243593)



# Staff Recommendations: Renewals

gg. Munro Associates LLC (#MRR205732)  
hh. Munro Associates LLC (#MRR205733)  
ii. Munro Associates LLC (#MRR205734)  
jj. Native Sun MFG LLC (#MPR243595)  
kk. Native Sun Wellness Inc (#MRR205706)  
**ll. Nature's Remedy of Massachusetts, Inc. (#MRR205718)**  
mm. Northampton Enterprises, Inc. (#MRR205702)  
nn. NS AJO Holdings Inc. (#MCR139986)  
oo. NS AJO Holdings Inc. (#MPR243599)  
pp. NS AJO Holdings Inc. (#MRR205708)  
qq. Ocean Breeze Cultivators LLC (#MCR139984)  
rr. Ocean Breeze Cultivators LLC (#MPR243598)  
ss. Silver Therapeutics, Inc. (#MRR205705)  
tt. Suns Mass, Inc. (#MCR139985)

uu. The Old Bank, LLC (#MRR205715)  
vv. Alternative Compassion Services (#RMD585)  
ww. Atlantic Medicinal Partners, Inc. (#RMD1506)  
xx. Beacon Compassion Center, Inc. Medical Marijuana  
Treatment Center  
yy. Briarleaf, LLC, Medical Marijuana Treatment Center  
zz. Green Gold Group, Inc. (#RMD786)  
aaa. Holistic Industries (#RMD1526)  
bbb. Mass Alternative Care, Inc. (#RMD726)  
ccc. Phytotherapy, Inc., Medical Marijuana Treatment Center  
ddd. Pleasantrees, Inc., Medical Marijuana Treatment Center  
eee. Theory Wellness Inc. (#RMD305)

# Staff Recommendations: Final Licenses

- a. Bud's Goods & Provisions Corp. (#MR282410), Retail
- b. Cannatech Medicinals, Inc. (#MC282690), Cultivation, Tier 2 / Indoor
- c. Caregiver-Patient Connection, LLC (#MC282206), Cultivation, Tier 3 / Indoor
- d. Coastal Cultivars, LLC (#MC282052), Cultivation, Tier 11 / Outdoor
- e. Green Meadows Farm, LLC (#MC282409), Cultivation, Tier 3 / Indoor
- f. Green Meadows Farm, LLC (#MP281763), Product Manufacturer
- g. Green Stratus Corp. (#MR282256), Retail
- h. Green World, LLC (#MR281939), Retail
- i. Harmony of MA, Inc. (#MR282668), Retail
- j. Heal Sturbridge, Inc. (#MR283323), Retail





# Staff Recommendations: Final Licenses

- k. Liberty Market, LLC (#MR281804), Retail
- l. MMM Transport, Inc. (#MT281556), Third-Party Transporter
- m. The Headyco, LLC (#MC281292), Cultivation, Tier 2 / Indoor
- n. The Healing Center, LLC (#MR283193), Retail
- o. The Old Bank, LLC (#MR282467), Retail
- p. Volcann, LLC (#MR282925), Retail
- q. Green Meadow Farm, LLC (#MTC1626), Medical Marijuana Treatment Center



# Staff Recommendations: Provisional Licenses

- a. Boathouse Store, LLC (#MRN283919), Retail
- b. C3 Berlin, LLC (#MRN283625), Retail
- c. Coastal Cultivars, LLC (#MRN282884), Retail
- d. Debilitating Medical Condition Treatment Centers (#MCN283056), Cultivation, Tier 10 / Outdoor
- e. **Discern'd** Cannabis Purveyors, Inc. (#MRN283997), Retail
- f. East Boston Bloom, LLC (#MRN283011), Retail
- g. FCC Holdings, LLC (#MBN282029), Microbusiness
- h. Flower Power Growers, Inc. (#MCN283122), Cultivation, Tier 3 / Indoor
- i. Flower Power Growers, Inc. (#MPN281983), Product Manufacturer
- j. Home Grown 617, LLC (#MRN281626), Retail
- k. Ideal Craft Cannabis, Inc. (#MCN283286), Cultivation, Tier 1 / Indoor
- l. Ideal Craft Cannabis, Inc. (#MPN282007), Product Manufacturer
- m. LC Square, LLC (#MPN282013), Product Manufacturer
- n. Leaf Relief, Inc. (#MRN283784), Retail
- o. Morning Dew, LLC (#MBN282152), Microbusiness
- p. Nuestra, LLC (#MRN283974), Retail
- q. R and R Ventures, LLC (#MBN281504), Microbusiness
- r. RC Retail Princeton, LLC (#MRN283815), Retail
- s. Tempest, Inc. (#MRN282429), Retail



# Commission Discussion & Votes



# Commission Discussion & Votes

- Commission Delegation of Limited Authority to the Executive Director
- Authorization to Issue Request for Responses: Social Equity Program Vendors







# Upcoming Meetings & Adjournment

# Upcoming Meetings and Important Dates

Next Meeting Date:  
Thursday, May 13

- Monthly Public Meeting
  - Remote via Teams



# 2021 Public Meeting Schedule

*Public Meeting dates are tentative and subject to change*

June 17

October 14

July 15

November 18

August 12

December 16


September 9





The Commission is in recess  
and will return at 1:00pm





# Additional Licensing Data

## Licensing Applications | April 16, 2021

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

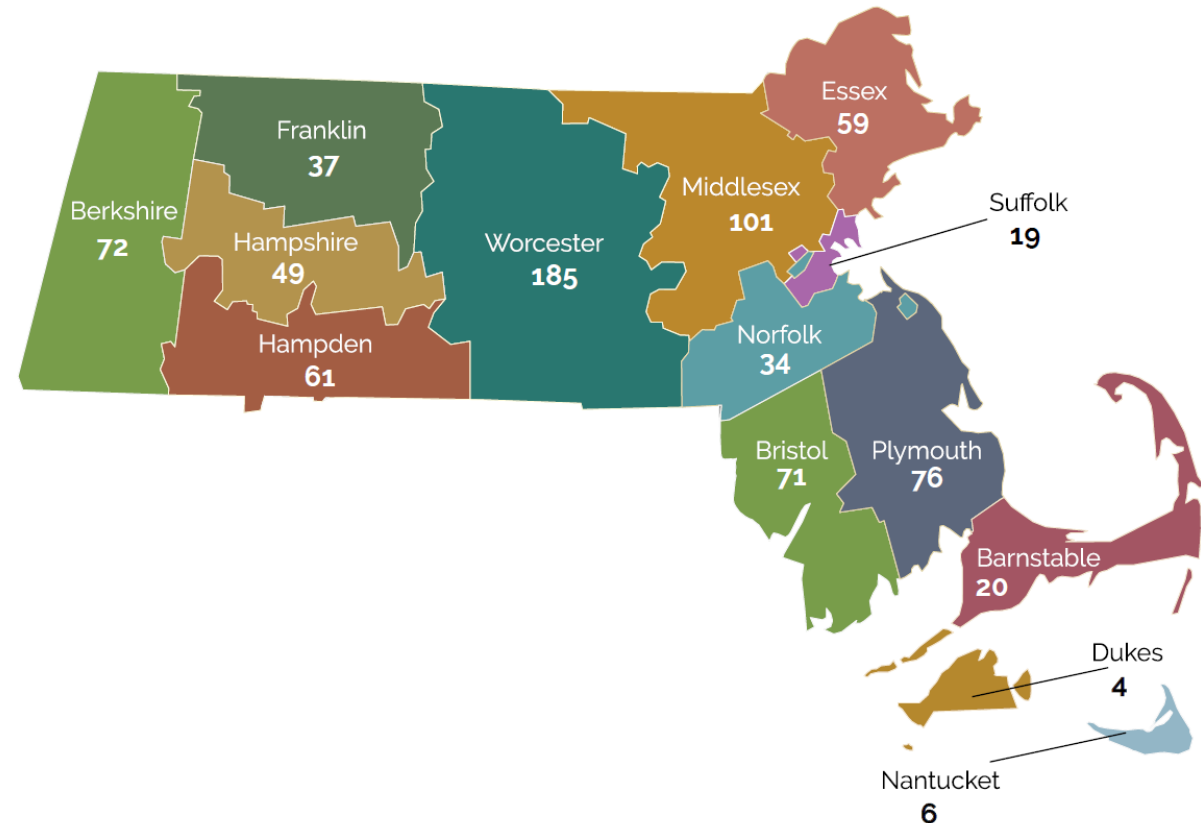
Type	#
Craft Marijuana Cooperative	4
Delivery-Only Provisional Licensure (Part 2)	4
Delivery-Only Pre-Certification (Part 1)	17
Independent Testing Laboratory	6
Marijuana Cultivator	60
Marijuana Microbusiness	6
Marijuana Product Manufacturer	46
Marijuana Research Facility	7
Marijuana Retailer	74
Marijuana Third Party Transporter	2
Microbusiness Delivery Endorsement	2
Marijuana Transporter with Other Existing ME License	4
<b>Total</b>	<b>232</b>



# Licensing Applications | April 16, 2021

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

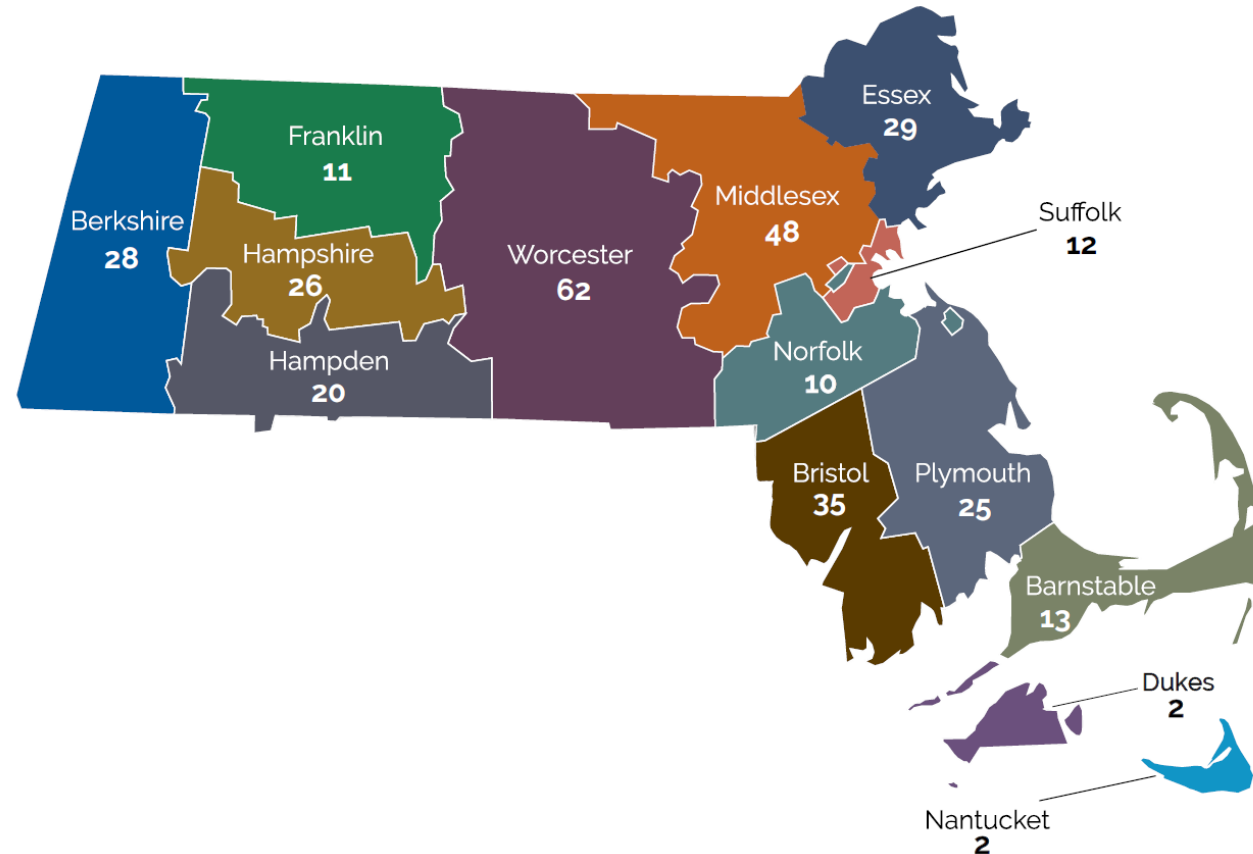
COUNTY	#	+/-
BARNSTABLE	20	
BERKSHIRE	72	+2
BRISTOL	71	+1
DUKES	4	
ESSEX	59	
FRANKLIN	37	+1
HAMPDEN	61	+2
HAMPSHIRE	49	
MIDDLESEX	101	+5
NANTUCKET	6	
NORFOLK	34	+2
PLYMOUTH	76	+1
SUFFOLK	19	+1
WORCESTER	185	+5
<b>TOTAL</b>	<b>794</b>	<b>+20</b>



## Licensing Applications | April 16, 2021

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

COUNTY	#	+/-
BARNSTABLE	13	
BERKSHIRE	28	
BRISTOL	35	+1
DUKES	2	
ESSEX	29	
FRANKLIN	11	
HAMPDEN	20	+2
HAMPSHIRE	26	
MIDDLESEX	48	+3
NANTUCKET	2	
NORFOLK	10	+1
PLYMOUTH	25	+1
SUFFOLK	12	
WORCESTER	62	+2
<b>TOTAL</b>	<b>323</b>	<b>+10</b>



## Licensing Applications | April 16, 2021

TYPE	PENDING APPLICATION	PRE-CERTIFIED/ ENDORSEMENT	INITIAL LICENSE DENIED	PROVISIONALLY APPROVED	PROVISIONAL LICENSE	FINAL LICENSE	COMMENCE OPERATION	TOTAL
Craft Marijuana Cooperative	4	-	0	0	1	0	0	5
Delivery-Only Provisional License (Part 2)	4	-	0	0	7	0	0	11
Delivery Pre-Certification (Part 1)	17	61	0	0	0	0	0	78
Independent Testing Laboratory	6	-	0	0	7	0	4	17
Marijuana Cultivator	60	-	2	28	150	17	47	304
Marijuana Microbusiness	6	-	0	4	9	1	3	23
Marijuana Product Manufacturer	46	-	1	27	104	12	41	231
Marijuana Research Facility	7	-	0	0	0	0	0	7
Marijuana Retailer	74	-	1	32	159	8	124	398
Marijuana Transporter with Other Existing ME License	2	-	0	2	1	0	2	7
Microbusiness Delivery	2	1	0	0	0	0	0	3
Third Party Transporter	4	-	0	0	2	0	2	8
<b>Total</b>	<b>232</b>	<b>62</b>	<b>4</b>	<b>93</b>	<b>440</b>	<b>38</b>	<b>223</b>	<b>1,092</b>

## Adult Use Agent Applications | April 16, 2021

24,231 Total Agent Applications:

255 Pending Establishment Agents

273 Total Pending { 18 Pending Laboratory Agents

- 1,122 Withdrawn
- 1,858 Incomplete
- 795 Expired
- 7,176 Surrendered
- 2 Denied
- 13,005 Active

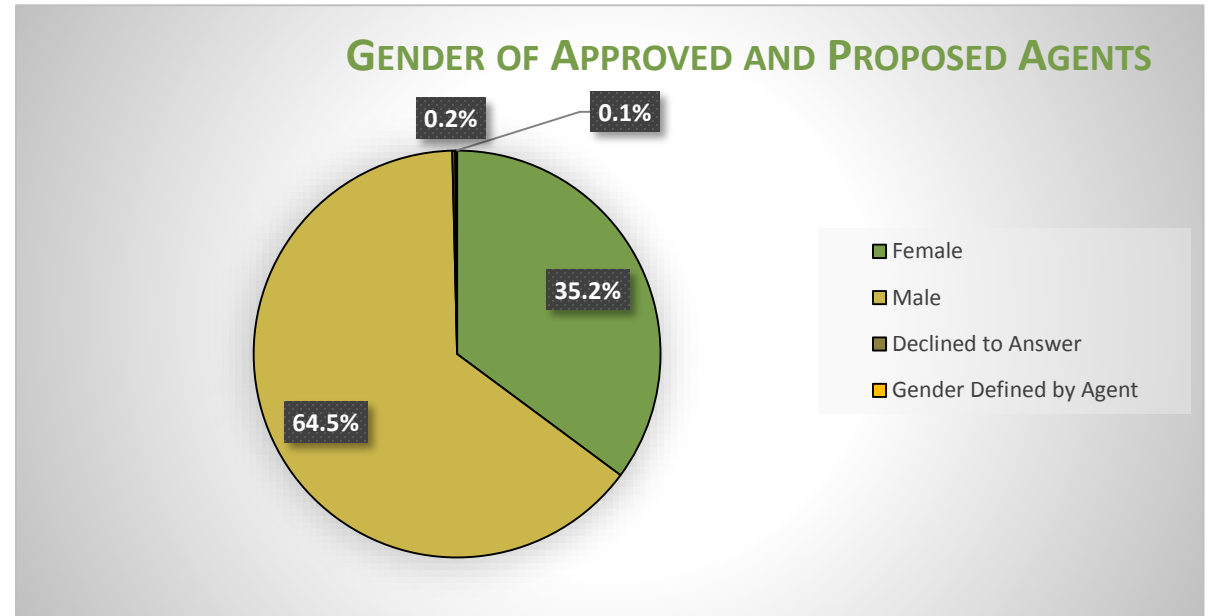
Of 273 Total Pending:

- 137 not yet reviewed
- 122 CCC requested more information
- 14 awaiting third party response
- 0 Review complete; awaiting approval

## Agent Applications | April 16, 2021

### Demographics of Approved and Pending Marijuana Establishment Agents

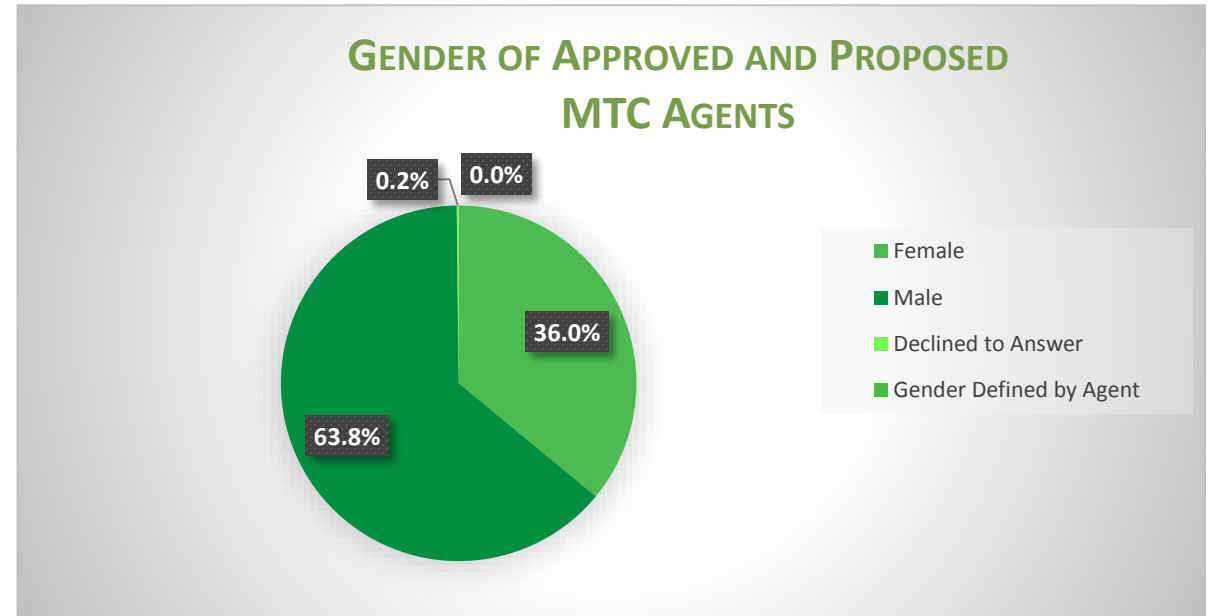
Gender	#	%
Female	4,668	35.2%
Male	8,560	64.5%
Declined to Answer	31	0.2%
Gender Defined by Applicant	19	0.1%
<b>Total</b>	<b>13,278</b>	<b>100%</b>



## Agent Applications | April 16, 2021

### Demographics of Approved and Pending Medical Marijuana Treatment Center Agents

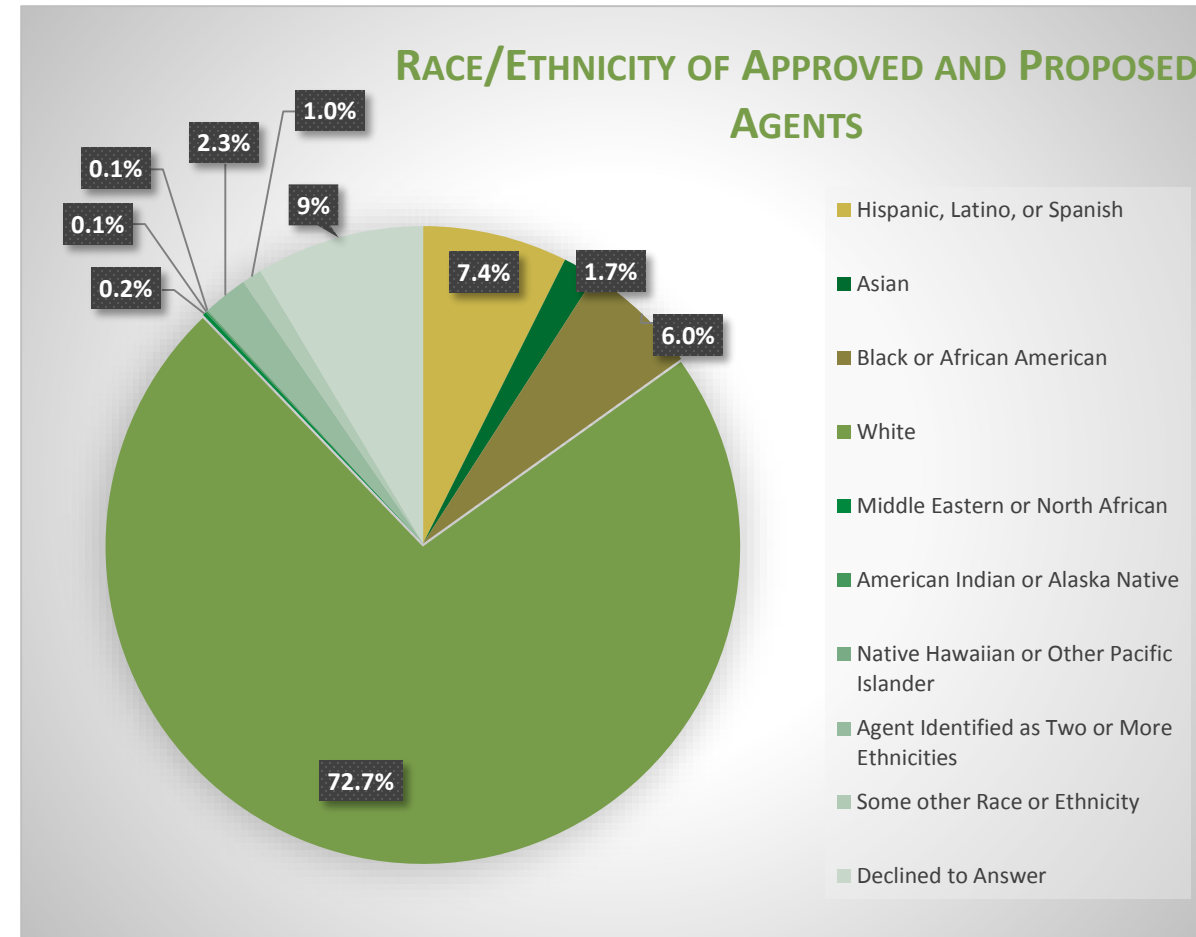
Gender	#	%
Female	2,685	36%
Male	4,765	63.8%
Declined to Answer	13	0.2%
Gender Defined by Applicant	0	0%
<b>Total</b>	<b>7,463</b>	<b>100%</b>



## Agent Applications | April 16, 2021

### Demographics of Approved and Pending Agents

Race/Ethnicity	#	%
Hispanic; Latino; Spanish	980	7.4%
Asian	228	1.7%
Black; African American	799	6%
White	9,651	72.7%
Middle Eastern; North African	25	0.2%
American Indian; Alaska Native	12	0.1%
Native Hawaiian; Other Pacific Islander	9	0.1%
Identified as Two or More Ethnicities	301	2.3%
Other Race or Ethnicity	134	1%
Declined to Answer	1,139	8.6%
<b>Total</b>	<b>13,278</b>	<b>100%</b>

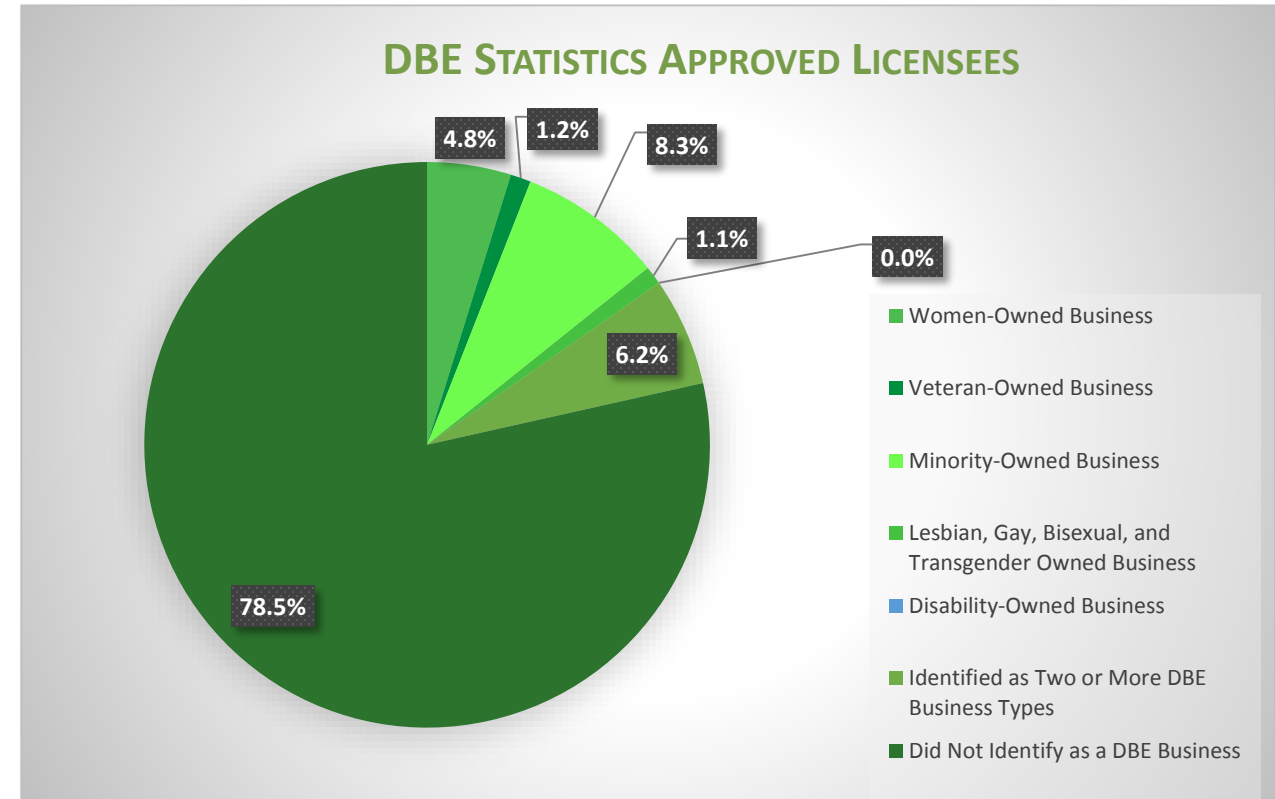


\* Additional data available at the end of slide presentation

## Licensing Applications | April 16, 2021

### Disadvantaged Business Enterprise Statistics for Approved Licensees

Type	#	% of Group
Women-Owned Business	41	4.8%
Veteran-Owned Business	10	1.2%
Minority-Owned Business	71	8.3%
Lesbian, Gay, Bisexual, and Transgender Owned Business	9	1.1%
Disability-Owned Business	0	0%
Identified as Two or More DBE Business Types	53	6.2%
Did Not Identify as a DBE Business	672	78.5%
<b>Total</b>	<b>856</b>	<b>100%</b>

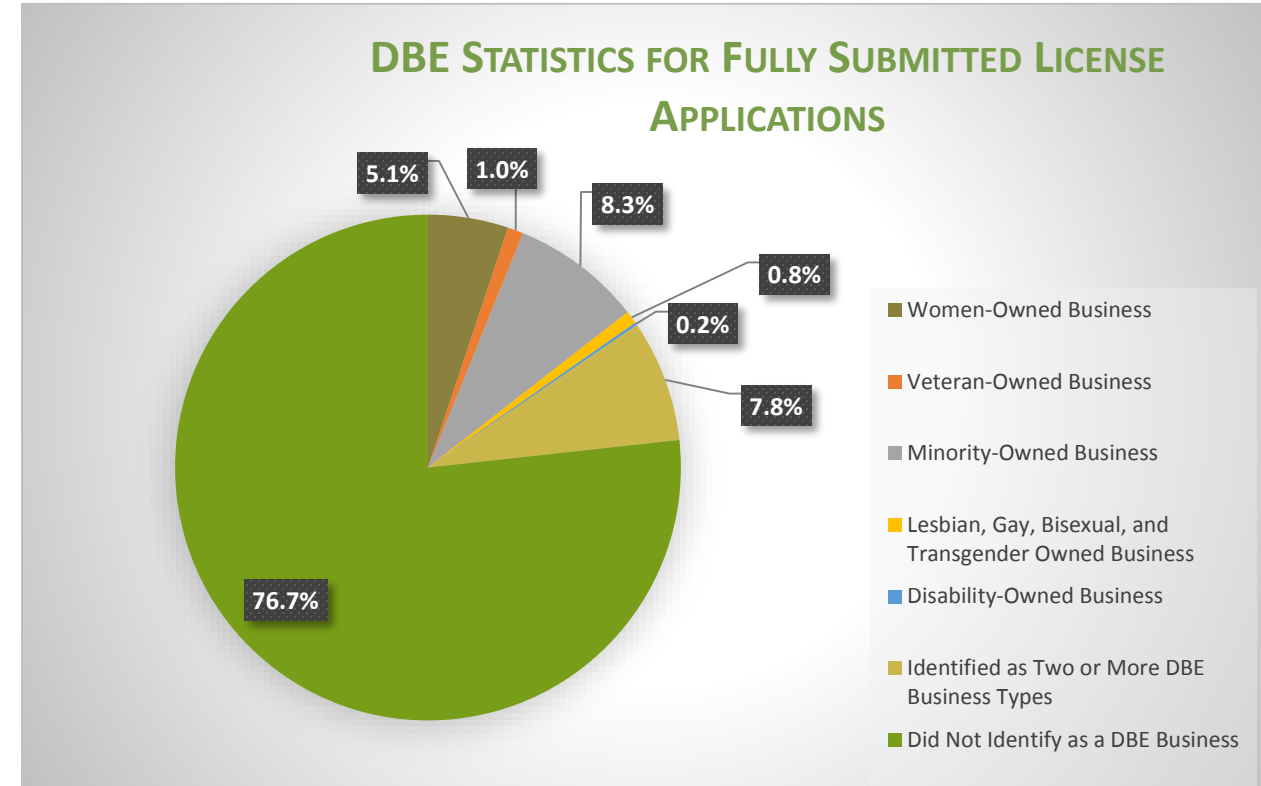




## Licensing Applications | April 16, 2021

### Disadvantaged Business Enterprise (DBE) Statistics for Fully Submitted License Applications

Type	#	% of Group
Women-Owned Business	56	5.1%
Veteran-Owned Business	11	1%
Minority-Owned Business	91	8.3%
Lesbian, Gay, Bisexual, and Transgender Owned Business	9	0.8%
Disability-Owned Business	2	0.2%
Identified as Two or More DBE Business Types	85	7.8%
Did Not Identify as a DBE Business	838	76.7%
<b>Total</b>	<b>1,092</b>	<b>100%</b>



## Medical Use Agent Application and Registrations | April 16, 2021

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

MTC Agent Applications	#
Pending MTC Agent Applications	62
Pending Laboratory Agent Applications	0
Incomplete	42
Revoked	4
Denied	31
Surrendered	6,120
Expired	992
Active	7,401
<b>Total Agent Applications</b>	<b>14,652</b>

MMJ Program	#
Certified Patients	102,598
Certified Active Patients	96,649
Active Caregivers	8,545
Registered Certifying Physicians	279
Registered Certifying Nurse Practitioners	93
Ounces Sold	80,124