



November Public Meeting

Remote Via Teams



November Monthly Public Meeting Packet

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Next Meeting Date & Adjournment

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November 9, 2022

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

CANNABIS CONTROL COMMISSION

**November 10, 2022
10:00AM**

Via Remote Participation via Microsoft Teams Live*

PUBLIC MEETING AGENDA

- I. Call to Order
- II. Commissioners' Comments & Updates
- III. Minutes for Approval
- IV. Executive Director's Report
- V. Staff Recommendations on Changes of Ownership
 - 1. Ember Gardens Cape Cod, LLC
 - 2. Temescal Wellness of Massachusetts, LLC
- VI. Staff Recommendations on Provisional Licenses
 - 1. Curaleaf Processing, Inc. (#REN281303), Marijuana Research Facility
 - 2. Delivered, Inc. (#MDA1303), Marijuana Delivery Operator
 - 3. Debilitating Medical Condition Treatment Centers (#MRN281621), Retail
 - 4. Ember Gardens Production, LLC (#MCN283722), Cultivation, Tier 3 / Indoor
 - 5. Ember Gardens Production, LLC (#MPN282196), Product Manufacturer
 - 6. Greenwayv, Inc. (#MCN283707), Cultivation, Tier 3 / Indoor
 - 7. Greenwayv, Inc. (#MPN282209), Product Manufacturer
 - 8. I & I Rose Garden, LLC (#MRN284031), Retail
 - 9. Natural Agricultural Products, LLC (#MRN284177), Retail
 - 10. Northeastcann, Inc. (#MRN284438), Retail
 - 11. The Blue Jay Botanicals (#DOA100159), Marijuana Courier
 - 12. Western Front, LLC (#MRN284389), Retail



VII. Staff Recommendations on Final Licenses

1. B Leaf Wellness Centre, LLC (#MR281356), Retail
2. Beacon Compassion, Inc. d/b/a UpTop (#MR284569), Retail
3. Capeway Cannabis, LLC (#MR282446), Retail
4. Community Growth Partners Northampton Operations, LLC d/b/a Rebelle (#MC282162), Cultivation, Tier 3 / Indoor
5. Green Meadow Farm, LLC (#MR284280), Retail
6. Green River Cannabis Company, Inc. (#MR282175), Retail
7. Holistic Health Group, Inc. d/b/a Suncrafted (#MR283126), Retail
8. KG Collective, LLC (#MR284181), Retail
9. Morando Brands, LLC (#MP281488), Product Manufacturing
10. Root 2 Naturals, LLC (#MB281675), Microbusiness
11. Rooted In, LLC d/b/a Rooted in Roxbury (#MR284261), Retail
12. Sira Naturals, Inc. (#MP281613), Product Manufacturing
13. Solurge, Inc. (#MC281300), Cultivation, Tier 3 / Indoor
14. Southcoast Apothecary, LLC d/b/a Ascend (#MR283075), Retail

VIII. Staff Recommendations on Renewals

1. 6 Bricks, LLC. (#MRR206151)
2. 617 Therapeutic Health Care, Inc. (#MRR206242)
3. B.O.T Realty, LLC (#MRR206254)
4. Bada Bloom!, Inc. (#MCR140335)
5. COASTAL CULTIVARS, INC. (#MCR140343)
6. Coil Brothers LLC (#MPR243862)
7. Community Care Collective, Inc. (#MRR206215)
8. Community Growth Partners Northampton Operations LLC (#MCR140349)
9. dba EMJ LLC (#MCR140353)
10. Emerald Grove, Inc. (#MPR243872)
11. Emerald Grove, Inc. (#MCR140338)
12. Evergreen Strategies, LLC. (#MRR206248)
13. Gibby's Garden LLC (#MBR169298)
14. Green Era LLC (#MRR206246)
15. Green Era LLC (#MRR206245)
16. Green Era LLC (#MRR206217)
17. Green Highland LLC (#MCR140347)
18. Green Highland LLC (#MPR243883)
19. Green Highland LLC (#MRR206255)



20. Greenhouse Naturals LLC (#MRR206238)
21. Highdration LLC (#MPR243858)
22. I & I Rose Garden LLC (#MPR243868)
23. Impressed LLC (#MCR140316)
24. Just Healthy, LLC (#MRR206264)
25. Just Healthy, LLC (#MPR243889)
26. Just Healthy, LLC (#MCR140360)
27. JustinCredible Cultivation, LLC (#MCR140333)
28. Lifted Genetics, LLC (#MCR140320)
29. Littleton Apothecary LLC (#MRR206218)
30. Mainely Productions LLC (#MCR140357)
31. Massachusetts Green Retail, Inc. (#MRR206224)
32. New England Cannabis Corporation, Inc. (#MPR243867)
33. New England Cannabis Corporation, Inc. (#MCR140328)
34. New Green LLC (#MRR206210)
35. Nova Farms, LLC (#MPR243869)
36. Nova Farms, LLC (#MCR140329)
37. Other Side Agronomy, Inc. (#MCR140342)
38. Pepperell Roots, LLC (#MCR140366)
39. Pepperell Roots, LLC (#MPR243892)
40. Power Fund Operations (fka) Silver Therapeutics, Inc. (#MCR140375)
41. ProVerde Laboratories, Inc. (#ILR267910)
42. Pudding Hill Farm LLC (#MCR140374)
43. Smokey Leaf (#MRR206257)
44. TDMA LLC (#MRR206236)
45. Temescal Wellness of Massachusetts, LLC (#MPR243870)
46. Temescal Wellness of Massachusetts, LLC (#MCR140330)
47. Terpene Journey, LLC (#MRR206188)
48. The Blue Jay Botanicals, Inc. (#MRR206240)
49. The Green Harbor Dispensary, LLC (#MRR206233)
50. The Hub Craft, LLC (#MCR140314)
51. Volcann LLC (#MRR206253)
52. 4BROS, INC. (#RMD1325)
53. ACK Natural, LLC (#RMD1627)
54. Apothca, Inc. (#RMD1065)
55. ARL Healthcare (#RMD1085)



- 56. Cresco HHH, LLC (#RMD686)
- 57. Cultivate Leicester, Inc (#RMD485)
- 58. Ermont, Inc (#RMD225)
- 59. Sanctuary Medicinals, Inc. (#RMD605)
- 60. Sanctuary Medicinals, Inc. (#RMD1128)
- IX. Commission Discussion and Votes
 - 1. Access & Equity Group: Discussion on Disproportionately Impacted Areas
 - 2. Draft Executive Director Performance Review Tool
 - 3. Job Description: Senior IT Support Specialist
 - 4. Consideration of New Host Community Agreement Requirements
- X. New Business Not Anticipated at the Time of Posting
- XI. Next Meeting Date
- XII. Adjournment

*Closed captioning available



CANNABIS CONTROL COMMISSION

September 15, 2022

10:00 AM

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

PUBLIC MEETING MINUTES

Documents:

- Application Materials associated with:
 - Staff Recommendations on Changes of Ownership
 - Greenhouse Naturals, LLC
 - Grow Team Gardens, LLC
 - Northampton Enterprises, Inc
 - Staff Recommendations on Provisional Licenses
 - Ahava, LLC (#MCN283670), Cultivation, Tier 10 / Indoor
 - Ahava, LLC (#MPN282159), Product Manufacturing
 - Bloominati AG, LLC (#MPN282180), Product Manufacturing
 - CastleLeaf, LLC (#MPN282158), Product Manufacturing
 - CastleLeaf, LLC (#MRN284521), Retail
 - CNA Stores, Inc. (#MCN283470), Cultivation, Tier 2 / Indoor
 - CNA Stores, Inc. (#MPN282064), Product Manufacturing
 - Coyote Cannabis Corporation (#MCN283657), Cultivation, Tier 1 / Indoor
 - Coyote Cannabis Corporation (#MPN282152), Product Manufacturing
 - Green Origin Farm, LLC (#MCN283660), Cultivation, Tier 4 / Outdoor
 - Green Origin Farm, LLC (#MPN282161), Product Manufacturing
 - Hudson Botanical Processing, LLC (#MPN282157), Product Manufacturing
 - New England Alchemy, LLC (#MPN282119), Product Manufacturing
 - New England Alchemy, LLC (#MPN282120), Product Manufacturing
 - New England Alchemy, LLC (#MRN284398), Retail
 - New England Alchemy, LLC (#MRN284412), Retail
 - New England Regional Dispensary (#MRN284607), Retail
 - Primus, LLC (#MRN284441), Retail
 - Solar Therapeutics, Inc. D/b/a Solar Cannabis Co. (#MRN282731), Retail
 - I.N.S.A., Inc. (#RMDA3362), Vertically Integrated Medical Marijuana Treatment Center
 - Staff Recommendations on Final Licenses
 - Canna Provisions, Inc. (#MC283454), Cultivation, Tier 2 / Outdoor



- Canna Provisions, Inc. (#MP281964), Product Manufacturing
- Coastal Infusions, LLC (#MP281984), Product Manufacturing
- Full Harvest Moonz, Inc. (#MR283351), Retail
- Green Era, LLC (#MR282001), Retail
- Highmark Provisions, LLC (#MC283492), Cultivation, Tier 2 / Indoor
- Ideal Craft Cannabis, Inc. (#MC283286), Cultivation, Tier 1 / Indoor
- Ideal Craft Cannabis, Inc. (#MP282007), Product Manufacturing
- Safetiva Labs, LLC (#IL281354), Independent Testing Laboratory
- Solurge, Inc. (#MR282372), Retail
- The Harvest Club, LLC d/b/a The Goods (#MR284103), Retail
- Toy Town Project, LLC d/b/a Toy Town Alternative Health (#MR281782), Retail
- Staff Recommendations on Renewals
 - Advesa MA, Inc. (#MRR206136)
 - 202 Trading Company, Inc. d/b/a Bud Barn (#MRR206106)
 - Alternative Therapies Group II, Inc. (#MRR206178)
 - Alternative Therapies Group II, Inc. (#MRR206121)
 - Alternative Therapies Group II, Inc. (#MRR206179)
 - ARL Healthcare Inc. (#MRR206009)
 - ARL Healthcare Inc. (#MPR243749)
 - ARL Healthcare Inc. (#MCR140183)
 - B Leaf Wellness Centre LLC (#MRR206162)
 - Blackstone Valley Naturals, LLC (#MBR169295)
 - Boston Bud Factory Inc. (#MRR206111)
 - Boston Bud Factory Inc. (#MPR243809)
 - Bud's Goods & Provisions Corp. (#MCR140291)
 - Bud's Goods and Provisions, Corp. (#MPR243841)
 - Caroline's Cannabis, LLC (#MRR206177)
 - Cedar Roots LLC (#MPR243826)
 - Cedar Roots LLC (#MCR140283)
 - Cloud Creamery LLC (#MPR243844)
 - Coastal Solutions (#MTR263105)
 - Cultivate Cultivation, LLC (#MPR243835)
 - Cultivate Cultivation, LLC (#MCR140287)
 - Cultivate Leicester, Inc. (#MRR206173)
 - Curaleaf Massachusetts Inc (#MRR206138)
 - Curaleaf Massachusetts Inc (#MRR206137)
 - DayDreamz Estates LLC (#MPR243819)
 - Deerfield Naturals, Inc. (#MRR206212)
 - Deerfield Naturals, Inc. (#MPR243857)
 - Deerfield Naturals, Inc. (#MCR140315)
 - Elevated Cultivation Co. LLC (#MPR243843)
 - Elevated Cultivation Co. LLC (#MCR140279)
 - Evokanna Labs LLC (#MPR243850)



- Evokanna Labs LLC (#MCR140303)
- Evokanna Labs LLC (#MXR126663)
- FFD Enterprises MA, Inc. (#MRR206201)
- FFD Enterprises MA, Inc. (#MPR243855)
- FFD Enterprises MA, Inc. (#MCR140309)
- GreenGrab, Inc. (#MDR272534)
- GTE Franklin LLC (#MRR206184)
- Heal Sturbridge, Inc. (#MRR206186)
- High Hopes LLC (#MRR206152)
- Highmark Provisions, LLC (#MCR140290)
- HOLYOKE 420 LLC (#MRR206156)
- I.N.S.A., Inc. (#MRR206203)
- I.N.S.A., Inc. (#MPR243853)
- I.N.S.A., Inc. (#MCR140305)
- Ideal Craft Cannabis, Inc. (#MPR243765)
- Ideal Craft Cannabis, Inc. (#MCR140208)
- Ideal Craft Cannabis, Inc. (#MRR206158)
- Insa, Inc. (#MRR206147)
- KG Collective LLC (#MRR206143)
- Late Spring, Inc. D/B/A Gage Cannabis Company (#MRR206157)
- Local Roots NE, Inc. (#MRR206167)
- Mass Wellspring LLC (#MRR206159)
- MCR Labs, LLC (#ILR267908)
- MedMen Boston, LLC (#MRR206095)
- Mill Town Agriculture, LLC (#MCR140294)
- Nature's Medicines, Inc. (#MRR206110)
- Nature's Medicines, Inc. (#MRR206109)
- Nature's Medicines, Inc. (#MCR140263)
- Nature's Medicines, Inc. (#MRR206170)
- Neamat, LLC (#MCR140254)
- NEO Manufacturing MA LLC (#MCR140288)
- New England Treatment Access, LLC. (#MRR206140)
- New England Treatment Access, LLC. (#MRR206180)
- New England Treatment Access, LLC. (#MRR206161)
- New England Treatment Access, LLC. (#MPR243838)
- New England Treatment Access, LLC. (#MCR140276)
- Patriot Care Corp (#MRR206176)
- Patriot Care Corp (#MRR206175)
- Patriot Care Corp (#MPR243837)
- Patriot Care Corp (#MCR140293)
- Power Fund Operations (fka) Silver Therapeutics, Inc. (#MPR243818)
- QPS Massachusetts Holdings LLC (#MPR243863)
- QPS Massachusetts Holdings LLC (#MCR140325)
- Reverie 73 Lowell, LLC (#MRR206142)



- Richards Flowers LLC (#MBR169293)
- Shine Delivery, LLC (#DOR5182947)
- SIRA NATURALS, INC. (#MCR140296)
- SIRA NATURALS, INC. (#MXR126664)
- SIRA NATURALS, INC. (#MCR140299)
- Solar Therapeutics Inc. (#MRR206153)
- Solar Therapeutics, Inc. (#MPR243830)
- Stafford Green, Inc. (#MCR140259)
- Team Green, LLC (#MRR206189)
- Temescal Wellness of Massachusetts, LLC (#MRR206194)
- Temescal Wellness of Massachusetts, LLC (#MRR206193)
- The Green Lady Dispensary II, Inc. (#MRR206206)
- The Haven Center, Inc. (#MRR206131)
- The Haven Center, Inc. (#MRR206130)
- The Haven Center, Inc. (#MPR243814)
- The Haven Center, Inc. (#MCR140271)
- The Heirloom Collective, Inc. (#MPR243821)
- The Heirloom Collective, Inc. (#MCR140280)
- Theory Wellness Inc (#MRR206155)
- Turning Leaf Centers Northampton, LLC (#MRR206120)
- Verdant Reparative, Inc. (#MRR206165)
- Verdant Reparative, Inc. (#MPR243831)
- Wellman Farm, Inc (#MPR243834)
- Western Front, LLC (#MRR206171)
- Cultivate Leicester, Inc. (#RMD3193)
- FFD Enterprises MA, Inc. (#RMD1165)
- Holistic Health Group, Inc. (#RMD1566)
- Happy Valley d/b/a HVV Massachusetts, Inc. (#RMD1405)
- M3 Ventures, Inc. (#RMD806)
- M3 Ventures, Inc. (#RMD465)
- Mass Wellspring, LLC (#RMD665)
- Patriot Care Corp Boston d/b/a Cannabist (#RMD265)
- Patriot Care Corp. (#RMD727)
- Silver Therapeutics, Inc. (#RMD3059)
- The Green Harbor Dispensary, LLC (#RMD1305)
- The Heirloom Collective, Inc (#RMD825)
- Life Essence, Inc. - d/b/a Trulieve (#RMD1365)
- Life Essence, Inc. - d/b/a Trulieve (#RMD1735)
- Life Essence, Inc. - d/b/a Trulieve (#RMD1736)
- [Meeting Packet](#)
- Memorandum re: 4 Bros, Inc. d/b/a East Coast Pharms Final Order and Stipulated Agreement
- Memorandum re: September 2022 Government Affairs Update



In Attendance:

- Chair Shannon O'Brien
- Commissioner Nurys Z. Camargo
- Commissioner Ava Callender Concepcion
- Commissioner Kimberly Roy
- Commissioner Bruce Stebbins

Minutes:

1) Call to Order

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

2) Chair's Comments and Updates – 00:02:15

- The Chair thanked her fellow Commissioners and staff for welcoming her to the Commission, helping onboard, and their work related to helping to ensure a safe, secure, and equitable cannabis industry in the Commonwealth. Commissioner Camargo welcomed new Chair Shannon O'Brien. She echoed the Executive Director's comments from the last Public Meeting regarding opening the Commission's Regulations. She noted that there was much at stake with the law's passage. She also stated the time frame to promulgate new regulations and the crucial policy discussion that needs to take place, primarily related to the Commission's equity mandate. She also noted that it was great to see her fellow Commissioners at the September 13th, 2022, Governance Executive Session and noted that the work being done at the Governance Session would help create a manual for Commissioners and thanked her fellow commissioners – for their input and the value they bring to the governance process. She thanked small business owners she met with last month, referenced some of the hurdles they face, and noted that as a policymaker, it was insightful to hear from them firsthand. She thanked former Interim Chair Sarah Kim for her work and leadership while with the Commission. She also noted that September was Hispanic/Latino heritage month and said that it was a great time to celebrate "Latinidad," the rich values, and the cultural contributions made to Hispanics/Latinos had made to society.
- Commissioner Concepcion thanked former Interim Chair Sarah Kim for her work and leadership while she was with the Commission, welcomed new Chair Shannon O'Brien, and noted that the Chair was joining the Commission at a pivotal time; and said that she looked forward to learning about the Chair's commitments and goals. She pointed out that the Commission's work remains ongoing and noted what the Commission had accomplished within the last year, especially around the Commission's equity mandate and addressing the deep scars of the War on Drugs. She noted she was looking forward to implementing the new law and detailed her focus on suitability and want to increase access for people with previous CORI records who want to participate in the industry, increase public awareness around



- those access and opportunity points, and move the Commission into a resource for any stakeholder working within the cannabis industry. She also noted that she and the Executive Director had the opportunity to represent the Commission and the Commonwealth at the Payment and Banking Compliance (PBC) Conference and talked with a wide array of Stakeholders about the lessons learned from state legalization while at the conference.
- Commissioner Roy noted the Commission's fifth anniversary and thanked the Commission staff for their work in helping to ensure a safe, secure, and equitable cannabis industry in the Commonwealth. She also specifically thanked Director of Government Affairs and Policy Matt Giancola and Manager of Government Affairs Ernesto Reyes Hernandez for their work and leadership around the passage of the Cannabis Omnibus Bill. She thanked former Interim Chair Sarah Kim for her work and leadership while with the Commission and welcomed new Chair Shannon O'Brien. She also said that the Commission was entering a new phase in its history and noted her excitement to work with the new Chair, her fellow Commissioners, Commission staff, and stakeholders to embark on a new round of regulatory review and promulgation. She noted that September 7th was overdose awareness day. She reported that there were over 2,000 confirmed opioid-related overdoses in the Commonwealth and said that she was encouraged by many in the cannabis industry that continue to look for effective ways to help folks end the cycle of opioid addiction.
 - Commissioner Stebbins welcomed Chair O'Brien and thanked former Interim Chair Sarah Kim for her work and leadership while with the Commission. He also thanked the Commission staff for their work in preparing the Commissioners for the Public Meeting. He also specifically thanked Director of Licensing Kyle Potvin and the Licensing staff for their work in bringing forth the most extensive roster of Renewals for Commission vote and consideration. He also thanked the Social Equity Team for their work and leadership related to the Social Equity Program and noted the team's presentation on workforce development in a program hosted by the Boston Chambers of Commerce. He also stated that he had an opportunity to join the Commission Advisory Board (CAB) Market Participation subcommittee as the Commission liaison and some of the topics discussed. He requested that organizations that assist veterans with employment reach out to him as he would appreciate learning about their work. He noted that he saw licensees' continued efforts to hire veterans. He also posed the question regarding the right opportunity for Commissioners to provide an update in a public meeting regarding their work with CAB subcommittees. He also echoed Commissioner Camargo's comments on Hispanic Heritage month and noted that September 15th was Roberto Clemente Day.
 - The Chair noted that as this was her first Commission Public Meeting, she would abstain from voting on matters up for Commission consideration and vote.

3) Minutes for Approval – 00:14:21

- July 28, 2022



- The Chair asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
- Commissioner Stebbins moved to approve the minutes for July 28, 2022, Commission public meeting.
- Commissioner Roy seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O'Brien – Abstained
- The Commission approved the minutes for the July 28, 2022, Commission public meeting by a vote of four in favor and one abstention.

4) Executive Director's Report – 00:16:04

- The Executive Director gave an overview of licensing data, starting on page 130 of the [Meeting Packet](#).
 - Commissioner Camargo asked a clarifying question regarding the number of courier licenses.
 - The Executive Director noted that the plus sign was meant to represent the increase in Courier licenses from the calendar year 2021.
 - Commissioner Roy noted the ratio between the number of providers to patients and asked if barriers to access could be the driving force behind the decline of Certified Patients from the calendar year 2021.
 - The Executive Director noted that barriers to access could be a driving force behind the decline of Certified Patients, noted some initiatives that the Commission had undertaken to address some of the barriers to access, and noted other possible barriers that could affect the number of Certified Patients, and their access to treatment.
 - Commissioner Concepcion asked a clarifying question regarding the decrease in Certified Active Patients and asked if the decline was included in the Active Patient count.
 - The Executive Director noted the decrease in Certified Active Patients was not included in the Active Patient count as they would not have an active certification.
 - The Chair asked a clarifying question regarding the Commission's outreach to Certified Active Caregivers.
 - The Executive Director noted the Commission's work to outreach to the Physician Assistant (PA) community and noted that there was still more that the Commission can do and referenced some intricacies related to becoming an Active Caregiver, especially as it related to cost.
 - The Chair also asked about the Commission's outreach to community health centers.



- The Executive Director noted that the Commission has not reached out to the Massachusetts League of Community Health Centers and noted the intricacies related to Community Health Centers becoming active caregivers.
- Commissioner Roy thanked the Commissioners for engaging in the conversation and noted the Commission's policy decisions to eliminate barriers to access. She noted that patients could go to the Commission's website to find the nearest caregiver and referenced other factors that affect access to medicine.
- Commissioner Camargo asked a clarifying question regarding the steps the Commission has taken to help veterans access medicine.
 - The Executive noted a previous study that the Commission Advisory Board conducted around veterans' access and that many veterans accessed healthcare through the United States Department of Veterans Affairs and noted intricacies related to veterans' ability to access medical cannabis.
- Commissioner Roy thanked the Executive Director, noted a previous study that the Commission Advisory Board conducted around veterans' access and that many veterans accessed healthcare through the United States Department of Veterans Affairs, and noted intricacies related to veterans' ability to access medical cannabis.
 - Commissioner Camargo thanked Commissioner Roy and noted her interest to continue the conversation.
 - The Chair also noted her interest to continue the conversation.
- The Executive Director gave an update on speaking engagements that the staff and Commission have participated in since the last public meeting.
- The Executive Director gave an update related to legislation that the Commission monitors in the Statehouse.
 - Commissioner Concepcion asked a clarifying question related to a presentation on the breakdown of the new law.
 - The Executive Director noted that staff would present and provide a breakdown of the new law at either the October or November public meeting and noted the August presentation on the topic.
 - Commissioner Concepcion noted her reasoning behind her question.
- The Executive Director gave an update related to hiring activity at the Commission.
 - The Chair encouraged the public to visit the Commission's website to look at the current and future job postings.
- The Executive Director, Chief Financial and Administrative Officer, Adriana Leon (CFAO Leon), and Budget Director May Nguyen (Budget Director Nguyen) gave an update related to FY 2022 Budget Closeout.
 - The Chair thanked CFAO Leon and Budget Director Nguyen for their presentation and asked a clarifying question regarding the budget for the Public Awareness Campaign.
 - CFAO Leon noted that the public awareness campaign was not funded past FY 2021 budget.



- The Executive Director provided further information on the Public Awareness Campaign and how the Commission has adapted to not receiving funding for the Public Awareness Campaign.
- Commissioner Camargo thanked CFAO Leon and Budget Director May for their presentation and work related to the Commission's Budget.
- Commissioner Roy echoed the Chair's comments and asked that the Commission get further clarity related to the public awareness requirements in the new Cannabis Equity law and thanked CFAO Leon and Budget Director May for their presentation and work related to the Commission's Budget. She also noted her willingness to advocate for Public Awareness Campaign funding.
- Commissioner Concepcion thanked CFAO Leon and Budget Director May for their presentation and work related to the Commission's Budget and suggested that the team present the revenue generated and allocated budget side by side. She also recommended that the team present the requested budget and what was received and utilized in future Budget Closeout presentations.
 - The Executive Director noted there might not be a correlation between the revenue generated and expenses and referenced the Legislative mandate that the Commission must be cost-neutral.
 - Commissioner Concepcion confirmed that the Executive Director was correct and provided further insight into her suggestion.
- Commissioner Roy suggested a slide on the budget calendar in a future presentation.
 - The Executive Director noted that he would incorporate that request into his Executive Director presentation in the future and noted the effects of the new law on the Commission's budget.
- Commissioner Concepcion noted that her previous comments were considerations and not necessarily concrete requests.
- Commissioner Stebbins noted that the Commission could collaborate and coordinate with the Department of Public Health to ensure some Public Awareness Campaign funding in the 2024 FY budget.
 - The Executive Director noted that the finance teams live in three traversing fiscal years.
- Commissioner Camargo noted that the Public Awareness Campaigns could be of interest to Commissioners, and some could focus and advocate on the matter.
 - The Executive Director noted the implications of the new law and the fact that the team was already thinking about a proposal for FY 2024 and that the Commissioners will have a chance to comment on the FY 2024 in the future.

Commissioner Camargo moved to take a fifteen-minute recess.

- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:



- Commissioner Camargo – Yes
- Commissioner Concepcion – Yes
- Commissioner Roy – Yes
- Commissioner Stebbins – Yes
- Chair O’Brien – Yes
- The Commission unanimously approved taking a fifteen-minute recess, returning at 11:05 AM (01:45:15)

5) Staff Recommendations on Changes of Ownership

- Commissioner Roy noted her reasoning behind adding a blanket condition to apply to all Changes of Ownership applications.
- Commissioner Roy requested a condition to apply to all Changes of Ownership applications.
 - Proposed condition: To help ensure compliance with 500.104(5), 501.104(5), it is required that an update be provided to the Commission within 5 days of any changes, modifications, or implementation issues by new ownership of prior ownerships’ Commission approved Diversity Plan and/or Positive Impact Plan, including but not limited to goals, programs, measurements, and accountability.

1. Greenhouse Naturals, LLC

- Licensing Manager Tsuko Defoe (Licensing Manager Defoe) presented the Staff Recommendation for Change of Ownership.
- The Chair asked for questions or comments.
- Commissioner Stebbins moved to approve the Change of Ownership, subject to the condition requested by Commissioner Roy.
- Commissioner Roy seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
- The Commission approved the Change of Ownership, subject to the condition requested by Commissioner Roy by a vote of four in favor and one abstention.

2. Grow Team Gardens, LLC

- Licensing Manager Defoe presented the Staff Recommendation for Change of Ownership.
- The Chair asked for questions or comments.
- Commissioner Roy moved to approve the Change of Ownership, subject to the condition requested by Commissioner Roy.
- Commissioner Stebbins seconded the motion.



- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O'Brien – Abstained
- The Commission approved the Change of Ownership, subject to the condition requested by Commissioner Roy by a vote of four in favor and one abstention.

3. Northampton Enterprises, Inc.

- Licensing Manager Defoe presented the Staff Recommendation for Change of Ownership.
- The Chair asked for questions or comments.
- Commissioner Stebbins moved to approve the Change of Ownership, subject to the condition requested by Commissioner Roy.
- Commissioner Roy seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O'Brien – Abstained
- The Commission unanimously approved the Change of Ownership, subject to the condition requested by Commissioner Roy.

6) Staff Recommendations on Provisional Licenses – 01:51:52

1. Ahava, LLC (#MCN283670), Cultivation, Tier 10 / Indoor

- Licensing Manager Defoe presented the Staff Recommendation for both Ahava, LLC Provisional Licenses.
- The Chair asked for questions or comments.
- Commissioner Roy thanked and congratulated Ahava, LLC for their Quality Control Plans.
- Commissioner Roy moved to approve the Provisional License.
- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O'Brien – Abstained
- The Commission approved the Provisional License, subject to the condition requested by Commissioner Roy by a vote of four in favor and one abstention.



2. Ahava, LLC (#MPN282159), Product Manufacturing
 - The Chair asked for questions or comments.
 - Commissioner Concepcion moved to approve the Provisional License.
 - Commissioner Stebbins seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O'Brien – Abstained
 - The Commission approved the Provisional License, subject to the condition requested by commissioner Stebbins by a vote of four in favor and one abstention.
3. Bloominati AG, LLC (#MPN282180), Product Manufacturing
 - Licensing Manager Defoe presented the Staff Recommendation for Provisional Licenses.
 - The Chair asked for questions or comments.
 - Commissioner Roy requested a Condition.
 - Proposed condition: Prior to final licensure please inform the Commission of your “Additional Operational Plans for Product Manufacturers” as it relates to Quality Control Samples. Licensees that opt to provide Quality Control Samples must include written policies and procedures in accordance with 935 CMR 500.130(5)(k) and 935 CMR 500.130 (9).
 - Commissioner Stebbins requested a condition.
 - Proposed condition: Prior to Final Application for Licensure, review Positive Impact Plan and consider any strategy for outreach to residents of nearby Areas of Disproportionate Impact designated communities in close proximity to Host Community of Northampton for employment and provide any update in accordance with 935 Code Mass. Regs. § 500.101(1)(a)11 and provide any updates to CCC Licensing Division.
 - Commissioner Camargo moved to approve the Provisional License subject to the conditions requested by Commissioners Roy and Stebbins.
 - Commissioner Concepcion seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O'Brien – Abstained
 - The Commission approved the Provisional License subject to the conditions requested by Commissioners Roy and Stebbins by a vote of four in favor and one abstention.



4. CastleLeaf, LLC (#MPN282158), Product Manufacturing
 - Licensing Manager Tsuko Defoe (Licensing Manager Defoe) presented the Staff Recommendation for both CastleLeaf, LLC Provisional Licenses.
 - The Chair asked for questions or comments.
 - Commissioner Roy requested a condition.
 - Proposed condition: Prior to final licensure please inform the Commission of your “Additional Operational Plans for Product Manufacturers” as it relates to Quality Control Samples. Licensees that opt to provide Quality Control Samples must include written policies and procedures in accordance with 935 CMR 500.130(5)(k) and 935 CMR 500.130 (9).
 - Commissioner Stebbins moved to approve the Provisional License, subject to the condition requested by Commissioner Roy.
 - Commissioner Camargo seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
 - The Commission approved the Provisional License, subject to the condition requested by Commissioner Roy by a vote of four in favor and one abstention.
5. CastleLeaf, LLC (#MRN284521), Retail
 - The Chair asked for questions or comments.
 - Commissioner Roy requested a condition.
 - Proposed condition: Prior to final licensure, in accordance with 935 CMR.140 (6) please include the phone number of the Massachusetts Substance Use Helpline on your consumer education.
 - Commissioner Stebbins moved to approve the Provisional License, subject to the condition requested by Commissioner Roy.
 - Commissioner Roy seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
 - The Commission approved the Provisional License, subject to the condition requested by Commissioner Roy by a vote of four in favor and one abstention.
6. CNA Stores, Inc. (#MCN283470), Cultivation, Tier 2 / Indoor



- Licensing Manager Tsuko Defoe (Licensing Manager Defoe) presented the Staff Recommendation for both CNA Stores, Inc. Provisional Licenses.
 - The Chair asked for questions or comments.
 - Commissioner Stebbins requested a condition to apply to both CNA Stores, Inc. Provisional Licenses.
 - Proposed condition: Prior to Final Application for Licensure, review Positive Impact Plan and consider any strategy for outreach to residents of nearby Areas of Disproportionate Impact designated communities in close proximity to Host Community of Winchendon for employment and provide any update in accordance with 935 Code Mass. Regs. § 500.101(1)(a)11 and provide any updates to CCC Licensing Division.
 - Commissioner Stebbins noted his reasoning for proposing a condition for the Bloominati AG, LLC, and both CNA Stores, Inc. Provisional Licenses.
 - Commissioner Stebbins moved to approve the Provisional License, subject to the condition requested by Commissioner Stebbins.
 - Commissioner Camargo seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
 - The Commission approved the Provisional License, subject to the condition requested by Commissioner Roy by a vote of four in favor and one abstention.
7. CNA Stores, Inc. (#MPN282064), Product Manufacturing
- The Chair asked for questions or comments.
 - Commissioner Stebbins moved to approve the Provisional License, subject to the condition requested by Commissioner Stebbins.
 - Commissioner Roy seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
 - The Commission approved the Provisional License, subject to the condition requested by Commissioner Stebbins by a vote of four in favor and one abstention.
8. Coyote Cannabis Corporation (#MCN283657), Cultivation, Tier 1 / Indoor
- Licensing Manager Tsuko Defoe (Licensing Manager Defoe) presented the Staff Recommendation for both Coyote Cannabis Corporation Provisional Licenses.
 - Commissioner Roy requested a condition.



- Proposed condition: Prior to final licensure please inform the Commission of your “Additional Operational Plans for Indoor Marijuana Cultivators” as it relates to Quality Control Samples. Licensees that opt to provide Quality Control Samples must include written policies and procedures in accordance with 935 CMR 500.120(12)(i), and 935 CMR 500.120(14).
 - Commissioner Stebbins moved to approve the Provisional License, subject to the condition requested by Commissioner Roy.
 - Commissioner Roy seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
 - The Commission approved the Provisional License, subject to the condition requested by Commissioner Roy by a vote of four in favor and one abstention.
9. Coyote Cannabis Corporation (#MPN282152), Product Manufacturing
- The Chair asked for questions or comments.
 - Commissioner Roy requested a condition.
 - Proposed condition: Prior to final licensure please inform the Commission of your “Additional Operational Plans for Product Manufacturers” as it relates to Quality Control Samples. Licensees that opt to provide Quality Control Samples must include written policies and procedures in accordance with 935 CMR 500.130(5)(k) and 935 CMR 500.130 (9).
 - Commissioner Stebbins noted his reasoning for the proposed condition.
 - Commissioner Roy moved to approve the Provisional License, subject to the conditions requested by Commissioner Roy and Stebbins.
 - Commissioner Roy seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
 - The Commission approved the Provisional License, subject to the conditions requested by Commissioners Roy and Stebbins by a vote of four in favor and one abstention.
10. Green Origin Farm, LLC (#MCN283660), Cultivation, Tier 4 / Outdoor
- Licensing Manager Defoe presented the Staff Recommendation for both Green Origin Farm, LLC Provisional Licenses.



- The Chair asked for questions or comments.
- Commissioner Roy commended the licensee for being a women owned business.
- Commissioner Roy requested a condition.
 - Proposed condition: Prior to final licensure please inform the Commission of your “Additional Operational Plans for Outdoor Marijuana Cultivators” as it relates to Quality Control Samples. Licensees that opt to provide Quality Control Samples must include written policies and procedures in accordance with 935 CMR 500.120(12)(i), and 935 CMR 500.120(14).
- Commissioner Camargo moved to approve the Provisional License, subject to the conditions requested by Commissioner Roy.
- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
- The Commission approved the Provisional License, subject to the conditions requested by Commissioner Roy by a vote of four in favor and one abstention.

11. Green Origin Farm, LLC (#MPN282161), Product Manufacturing

- The Chair asked for questions or comments.
- Commissioner Roy requested a condition.
 - Proposed condition: Prior to final licensure please inform the Commission of your “Additional Operational Plans for Product Manufacturers” as it relates to Quality Control Samples. Licensees that opt to provide Quality Control Samples must include written policies and procedures in accordance with 935 CMR 500.130(5)(k) and 935 CMR 500.130 (9).
- Commissioner Stebbins moved to approve the Provisional License.
- Commissioner Camargo seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
- The Commission approved the Provisional License, subject to the conditions requested by Commissioner Roy by a vote of four in favor and one abstention.

12. Hudson Botanical Processing, LLC (#MPN282157), Product Manufacturing

- Licensing Manager Defoe presented the Staff Recommendation for all four Hudson Botanical Processing, LLC Provisional Licenses.
- The Chair asked for questions or comments.



- Commissioner Roy noted her reasoning behind the proposed condition.
- Commissioner Roy requested a condition.
 - Proposed condition: Prior to final licensure please inform the Commission of your “Additional Operational Plans for Product Manufacturers” as it relates to Quality Control Samples. Licensees that opt to provide Quality Control Samples must include written policies and procedures in accordance with 935 CMR 500.130(5)(k) and 935 CMR 500.130 (9).
- Commissioner Concepcion moved to approve the Provisional License.
- Commissioner Roy seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
- The Commission unanimously approved the Provisional License.

13. New England Alchemy, LLC (#MPN282119), Product Manufacturing

- Licensing Manager Defoe presented the Staff Recommendation for all four New England Alchemy, LLC Provisional Licenses.
- The Chair asked for questions or comments.
- Commissioner Roy requested a condition to apply to both New England Alchemy, LLC Product Manufacturing Licenses.
 - Proposed Condition: Prior to final licensure please inform the Commission of your “Additional Operational Plans for Product Manufacturers” as it relates to Quality Control Samples. Licensees that opt to provide Quality Control Samples must include written policies and procedures in accordance with 935 CMR 500.130(5)(k) and 935 CMR 500.130 (9).
- Commissioner Stebbins requested a condition for all four New England Alchemy, LLC Provisional Licenses.
 - Proposed condition: Prior to Final Application for Licensure, contact CCC Licensing Division with an update to confirm your training and recruitment partners and eligibility to support your activities in accordance with 935 CMR 500.101(1)C 8.k.
- Commissioner Stebbins noted the reasoning behind adding his condition.
- Commissioner Stebbins moved to approve the Provisional License, subject to the conditions requested by Commissioners Roy and Stebbins.
- Commissioner Roy seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes



- Chair O'Brien – Abstained
- The Commission approved the Provisional License, subject to the conditions requested by Commissioners Roy and Stebbins by a vote of four in favor and one abstention.

14. New England Alchemy, LLC (#MPN282120), Product Manufacturing

- The Chair asked for questions or comments.
- Commissioner Stebbins moved to approve the Provisional License, subject to the conditions requested by Commissioners Roy and Stebbins.
- Commissioner Concepcion seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O'Brien – Abstained
- The Commission approved the Provisional License, subject to the conditions requested by Commissioners Roy and Stebbins by a vote of four in favor and one abstention.

15. New England Alchemy, LLC (#MRN284398), Retail

- The Chair asked for questions or comments.
- Commissioner Roy requested a condition to apply to both New England Alchemy, LLC Retail licenses.
 - Proposed Condition: Prior to final licensure, in accordance with 935 CMR.140 (6) please include the phone number of the for the Massachusetts Substance Use Helpline on your consumer education.
- Commissioner Stebbins moved to approve the Provisional License, subject to the conditions requested by Commissioners Roy and Stebbins.
- Commissioner Roy seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O'Brien – Abstained
- The Commission approved the Provisional License, subject to the conditions requested by Commissioners Roy and Stebbins by a vote of four in favor and one abstention.

16. New England Alchemy, LLC (#MRN284412), Retail

- The Chair asked for questions or comments.



- Commissioner Roy moved to approve the Provisional License, subject to the conditions requested by Commissioners Roy and Stebbins.
- Commissioner Concepcion seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
- The Commission approved the Provisional License, subject to the conditions requested by Commissioners Roy and Stebbins by a vote of four in favor and one abstention.

17. New England Regional Dispensary (#MRN284607), Retail

- Licensing Manager Defoe presented the Staff Recommendation for Provisional License.
- The Chair asked for questions or comments.
- Commissioner Roy requested a condition.
 - Proposed condition: Prior to final licensure, in accordance with 935 CMR.140 please include the phone number for the Massachusetts Substance Use Helpline on your consumer education.
- Commissioner Stebbins moved to approve the Provisional License, subject to the condition requested by Commissioner Roy.
- Commissioner Roy seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
- The Commission approved the Provisional License, subject to the condition requested by Commissioner Roy by a vote of four in favor and one abstention.

18. Primus, LLC (#MRN284441), Retail

- Licensing Manager Defoe presented the Staff Recommendation for Provisional License.
- The Chair asked for questions or comments.
- Commissioner Roy requested a condition.
 - Proposed condition: Prior to final licensure, in accordance with 935 CMR.140 (6) please include the phone number for the Massachusetts Substance Use Helpline on your consumer education.
- Commissioner Concepcion moved to approve the Provisional License, subject to the condition requested by Commissioner Roy.



- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
- The Commission approved the Provisional License, subject to the condition requested by Commissioner Roy by a vote of four in favor and one abstention.

19. Solar Therapeutics, Inc. D/b/a Solar Cannabis Co. (#MRN282731), Retail

- Licensing Manager Defoe presented the Staff Recommendation for Provisional License.
- The Chair asked for questions or comments.
- Commissioner Roy commended the licensee for their use of renewable energy.
- Commissioner Roy requested a condition.
 - Proposed condition: Prior to final licensure, in accordance with 935 CMR.140 (6) (a-j) please provide the commission with a copy of your consumer education. To ensure compliance, consumer educational materials shall include subsections; a – j, as listed in said regulation and must also include the phone number for the Massachusetts Substance Use Helpline.
- Commissioner Stebbins moved to approve the Provisional License, subject to the condition requested by Commissioner Roy.
- Commissioner Roy seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
- The Commission approved the Provisional License, subject to the condition requested by Commissioner Roy by a vote of four in favor and one abstention.

20. I.N.S.A., Inc. (#RMDA3362), Vertically Integrated Medical Marijuana Treatment Center

- Licensing Manager Defoe presented the Staff Recommendation for Provisional License.
- The Chair asked for questions or comments.
- Commissioner Stebbins requested a condition.
 - Proposed condition: Prior to Final Application for Licensure, submit to CCC response regarding new Diversity Plan Goal #2 and how goal promotes equity among people of color, particularly Black, African American, Latinx, and Indigenous people, women, Veterans, persons with disabilities, and LGBTQ+



people, in the operation of the MTC in accordance with 935 Code Mass. Regs. § 501.101 1(c) 8.k.

- Commissioner Stebbins moved to approve the Provisional License, subject to the condition requested by Commissioner Stebbins.
- Commissioner Camargo seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O'Brien – Abstained
- The Commission approved the Provisional License, subject to the condition requested by Commissioner Stebbins by a vote of four in favor and one abstention.

7) Staff Recommendations on Final Licenses – 02:32:56

- The Chair noted that Final Licenses would be considered in one roster (1) all Adult-Use Licenses.
- Adult-Use Roster
 - The Chair noted that the adult-use Renewal roster will consist of items numbered 1 through 12, as identified on the agenda.
 - The Chair asked for questions or comments.
 - Commissioner Stebbins moved to approve the roster of Adult-Use Final Licenses.
 - Commissioner Camargo seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O'Brien – Abstained
 - The Commission approved the Adult-Use roster of Final Licenses by a vote of four in favor and one abstention.

1. Canna Provisions, Inc. (#MC283454), Cultivation, Tier 2 / Outdoor
2. Canna Provisions, Inc. (#MP281964), Product Manufacturing
3. Coastal Infusions, LLC (#MP281984), Product Manufacturing
4. Full Harvest Moonz, Inc. (#MR283351), Retail
5. Green Era, LLC (#MR282001), Retail
6. Highmark Provisions, LLC (#MC283492), Cultivation, Tier 2 / Indoor



7. Ideal Craft Cannabis, Inc. (#MC283286), Cultivation, Tier 1 / Indoor
8. Ideal Craft Cannabis, Inc. (#MP282007), Product Manufacturing
9. Safetiva Labs, LLC (#IL281354), Independent Testing Laboratory
10. Solurge, Inc. (#MR282372), Retail
11. The Harvest Club, LLC d/b/a The Goods (#MR284103), Retail
12. Toy Town Project, LLC d/b/a Toy Town Alternative Health (#MR281782), Retail

8) Staff Recommendations on Renewals – 02:35:00

- Commissioner Camargo noted that the roster of Renewals set a record for the number of licenses up for Commission consideration and vote. She also acknowledged ARL Healthcare Inc., B Leaf Wellness Centre LLC, Boston Bud Factory Inc., GTE Franklin LLC for their work in their Diversity and Positive Impact Plans.
- Commissioner Stebbins thanked the licensing Staff for their work related to the number of Renewals up for Commission consideration and vote. He also noted that he was impressed with the roster of Renewal applications up for Commission consideration and vote. He commended Neamat, LLC, Boston Bud Factory Inc., and Nature's Medicines, Inc for their Diversity and Positive Impact Plans. He noted that he has previously raised an issue related to the requests from licensees to host communities for the municipal cost associated with an operation of a marijuana establishment and noted that by in large roster of Renewal applications did a good job of giving host communities adequate time to respond before their renewal applications but noted that two licenses did not allow adequate time before their renewal.
- Commissioner Roy acknowledged ARL Healthcare Inc., Boston Bud Factory Inc., Caroline's Cannabis LLC, and GTE Franklin LLC for their leadership in their host community and for their Diversity and Positive Impact Plans. She also noted that Blackstone Valley Naturals, LLC, did not meet its original goal to donate to a charity and asked the licensee to identify a new charity.
- The Chair noted that Renewals would be considered as one or more rosters; There are two rosters: (1) Team Green, LLC (#MRR206189) (2) all Adult-use applications, including those subjects to a Commissioner's individually requested conditions (3) Verdant Reparative, Inc. (#MRR206165), Verdant Reparative, Inc. (#MPR243831) and Western Front, LLC (#MRR206171), which Commissioner Camargo was recusing herself from and (4) all Medical-use applications.
- Adult-Use
 - The Chair noted that the adult-use Renewal roster will consist of items numbered 1 through 94, as identified on the agenda.
 - The Chair asked for questions or comments.
 - Commissioner Roy moved to approve the roster of adult-use Renewals, subject to Commissioner Stebbins's individually requested conditions.
 - Commissioner Concepcion seconded the motion.



- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
 - The Commission approved the adult-use Renewals, by a vote of four in favor, and one abstention.
- Adult-Use
 - The Chair noted that the adult-use Renewal roster will consist of items numbered 95, and 96, and 98 as identified on the agenda.
 - The Chair asked for questions or comments.
 - Commissioner Concepcion moved to approve the roster of adult-use Renewals, subject to Commissioners Camargo and Stebbins’s individually requested conditions.
 - Commissioner Stebbins seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Recused
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
 - The Commission approved the roster of adult-use Renewals, by a vote of three in favor, one recusal, and one abstention.
 - Adult-Use
 - The Chair noted that the adult-use Renewal roster will consist of item numbered 97, as identified on the agenda.
 - The Chair asked for questions or comments.
 - Commissioner Stebbins moved to approve the adult-use license.
 - Commissioner Roy seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
 - The Commission approved the roster of adult-use Renewals, by a vote of Four in favor, and one abstention.
 - Medical-Use
 - The Chair noted that the medical-use Renewal roster will consist of items numbered 99 through 113 as identified on the agenda.



- The Chair asked for questions or comments.
 - Commissioner Stebbins moved to approve the roster of medical-use Renewals.
 - Commissioner Camargo seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
 - The Commission unanimously approved the roster of medical-use Renewals by a vote of four in favor and one abstention.
- Adult-Use
 - The Executive Director noted that Team Green, LLC (#MRR206189) was included on the agenda, but not included in the presentation. Thus, it was voted on after the lunch recess and considered a separate matter.
 - The Chair noted that the adult-use Renewal roster will consist of item numbered 83, as identified on the agenda.
 - The Chair asked for questions or comments.
 - Commissioner Stebbins moved to approve the adult-use license.
 - Commissioner Roy seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
 - The Commission approved the adult-use Renewals, by a vote of four in favor, and one abstention.

1. 202 Trading Company, Inc. d/b/a Bud Barn (#MRR206106)
2. Alternative Therapies Group II, Inc. (#MRR206178)
3. Alternative Therapies Group II, Inc. (#MRR206121)
4. Alternative Therapies Group II, Inc. (#MRR206179)
5. ARL Healthcare Inc. (#MRR206009)
6. ARL Healthcare Inc. (#MPR243749)
7. ARL Healthcare Inc. (#MCR140183)
8. B Leaf Wellness Centre LLC (#MRR206162)
9. Blackstone Valley Naturals, LLC (#MBR169295)
10. Boston Bud Factory Inc. (#MRR206111)
11. Boston Bud Factory Inc. (#MPR243809)
12. Bud's Goods & Provisions Corp. (#MCR140291)
13. Bud's Goods and Provisions, Corp. (#MPR243841)



14. Caroline's Cannabis, LLC (#MRR206177)
15. Cedar Roots LLC (#MPR243826)
16. Cedar Roots LLC (#MCR140283)
17. Cloud Creamery LLC (#MPR243844)
18. Coastal Solutions (#MTR263105)
19. Cultivate Cultivation, LLC (#MPR243835)
20. Cultivate Cultivation, LLC (#MCR140287)
21. Cultivate Leicester, Inc. (#MRR206173)
22. Curaleaf Massachusetts Inc (#MRR206138)
23. Curaleaf Massachusetts Inc (#MRR206137)
24. DayDreamz Estates LLC (#MPR243819)
25. Deerfield Naturals, Inc. (#MRR206212)
26. Deerfield Naturals, Inc. (#MPR243857)
27. Deerfield Naturals, Inc. (#MCR140315)
28. Elevated Cultivation Co. LLC (#MPR243843)
29. Elevated Cultivation Co. LLC (#MCR140279)
30. Evokanna Labs LLC (#MPR243850)
31. Evokanna Labs LLC (#MCR140303)
32. Evokanna Labs LLC (#MXR126663)
33. FFD Enterprises MA, Inc. (#MRR206201)
34. FFD Enterprises MA, Inc. (#MPR243855)
35. FFD Enterprises MA, Inc. (#MCR140309)
36. GreenGrab, Inc. (#MDR272534)
37. GTE Franklin LLC (#MRR206184)
38. Heal Sturbridge, Inc. (#MRR206186)
39. High Hopes LLC (#MRR206152)
40. Highmark Provisions, LLC (#MCR140290)
41. HOLYOKE 420 LLC (#MRR206156)
42. I.N.S.A., Inc. (#MRR206203)
43. I.N.S.A., Inc. (#MPR243853)
44. I.N.S.A., Inc. (#MCR140305)
 - Commissioner Stebbins requested two conditions to apply to all three I.N.S.A, Inc. licenses.
 - Requested conditions:
 - Within thirty business days of approval of Application for Renewal, submit to CCC response regarding new Diversity Plan Goal #2 and how goal promotes equity among people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, women, Veterans, persons with disabilities, and LGBTQ+ people, in the operation of the Marijuana Establishment in accordance with 935 Code Mass. Regs. § 500.101(1)(c) 8.k.
 - Within thirty business days of approval of Application for Renewal, submit to CCC response regarding how new Diversity Plan incorporates stated intentions “To maintain a diverse



workforce that is representative of the communities in which the Company operates by striving to meet or exceed the following target demographics for the Company's operations in Massachusetts..." and "The Company will continue to pursue programs in order to maintain or exceed the target demographics for these groups" in order to promote equity among people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, women, Veterans, persons with disabilities, and LGBTQ+ people, in the operation of the Marijuana Establishment in accordance with 935 Code Mass. Regs. § 500.101(1)(c) 8.k.

45. Ideal Craft Cannabis, Inc. (#MPR243765)

46. Ideal Craft Cannabis, Inc. (#MCR140208)

47. Ideal Craft Cannabis, Inc. (#MRR206158)

48. Insa, Inc. (#MRR206147)

- Commissioner Stebbins requested two conditions to apply to the Insa, Inc. (#MRR206147) license.

- Requested conditions:

- Within thirty business days of approval of Application for Renewal, submit to CCC response regarding new Diversity Plan Goal #2 and how goal promotes equity among people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, women, Veterans, persons with disabilities, and LGBTQ+ people, in the operation of the Marijuana Establishment in accordance with 935 Code Mass. Regs. § 500.101(1)(c) 8.k.
- Within thirty business days of approval of Application for Renewal, submit to CCC response regarding how new Diversity Plan incorporates stated intentions "To maintain a diverse workforce that is representative of the communities in which the Company operates by striving to meet or exceed the following target demographics for the Company's operations in Massachusetts..." and "The Company will continue to pursue programs in order to maintain or exceed the target demographics for these groups" in order to promote equity among people of color, particularly Black, African American, Hispanic, Latinx, and Indigenous people, women, Veterans, persons with disabilities, and LGBTQ+ people, in the operation of the Marijuana Establishment in accordance with 935 Code Mass. Regs. § 500.101(1)(c) 8.k.

49. KG Collective LLC (#MRR206143)

50. Late Spring, Inc. D/B/A Gage Cannabis Company (#MRR206157)

51. Local Roots NE, Inc. (#MRR206167)

52. Mass Wellspring LLC (#MRR206159)

53. MCR Labs, LLC (#ILR267908)

54. MedMen Boston, LLC (#MRR206095)



55. Mill Town Agriculture, LLC (#MCR140294)
56. Nature's Medicines, Inc. (#MRR206110)
57. Nature's Medicines, Inc. (#MRR206109)
58. Nature's Medicines, Inc. (#MCR140263)
59. Nature's Medicines, Inc. (#MRR206170)
60. Neamat, LLC (#MCR140254)
61. NEO Manufacturing MA LLC (#MCR140288)
62. New England Treatment Access, LLC. (#MRR206140)
63. New England Treatment Access, LLC. (#MRR206180)
64. New England Treatment Access, LLC. (#MRR206161)
65. New England Treatment Access, LLC. (#MPR243838)
66. New England Treatment Access, LLC. (#MCR140276)
67. Patriot Care Corp (#MRR206176)
68. Patriot Care Corp (#MRR206175)
69. Patriot Care Corp (#MPR243837)
70. Patriot Care Corp (#MCR140293)
71. Power Fund Operations (fka) Silver Therapeutics, Inc. (#MPR243818)
72. QPS Massachusetts Holdings LLC (#MPR243863)
73. QPS Massachusetts Holdings LLC (#MCR140325)
 - Commissioner Stebbins requested a condition to apply to both QPS Massachusetts Holdings LLC licenses.
 - Requested conditions: Within thirty business days of approval of Application for Renewal, provide updated request to the Host Community of Franklin related to the operation of the establishment in accordance with 935 Code Mass. Regs. § 500.103(4)(b) and (4)(f).
74. Reverie 73 Lowell, LLC (#MRR206142)
75. Richards Flowers LLC (#MBR169293)
76. Shine Delivery, LLC (#DOR5182947)
77. SIRA NATURALS, INC. (#MCR140296)
78. SIRA NATURALS, INC. (#MXR126664)
79. SIRA NATURALS, INC. (#MCR140299)
80. Solar Therapeutics Inc. (#MRR206153)
81. Solar Therapeutics, Inc. (#MPR243830)
82. Stafford Green, Inc. (#MCR140259)
83. Team Green, LLC (#MRR206189)
84. Temescal Wellness of Massachusetts, LLC (#MRR206194)
85. Temescal Wellness of Massachusetts, LLC (#MRR206193)
86. The Green Lady Dispensary II, Inc. (#MRR206206)
87. The Haven Center, Inc. (#MRR206131)
88. The Haven Center, Inc. (#MRR206130)
89. The Haven Center, Inc. (#MPR243814)
90. The Haven Center, Inc. (#MCR140271)
91. The Heirloom Collective, Inc. (#MPR243821)
92. The Heirloom Collective, Inc. (#MCR140280)



93. Theory Wellness Inc (#MRR206155)
94. Turning Leaf Centers Northampton, LLC (#MRR206120)
95. Verdant Reparative, Inc. (#MRR206165)
96. Verdant Reparative, Inc. (#MPR243831)
97. Wellman Farm, Inc (#MPR243834)
98. Western Front, LLC (#MRR206171) (End of Adult-Use)
99. Cultivate Leicester, Inc. (#RMD3193)
100. FFD Enterprises MA, Inc. (#RMD1165)
101. Holistic Health Group, Inc. (#RMD1566)
102. Happy Valley d/b/a HVV Massachusetts, Inc. (#RMD1405)
103. M3 Ventures, Inc. (#RMD806)
104. M3 Ventures, Inc. (#RMD465)
105. Mass Wellspring, LLC (#RMD665)
106. Patriot Care Corp Boston d/b/a Cannabist (#RMD265)
107. Patriot Care Corp. (#RMD727)
108. Silver Therapeutics, Inc. (#RMD3059)
109. The Green Harbor Dispensary, LLC (#RMD1305)
110. The Heirloom Collective, Inc (#RMD825)
111. Life Essence, Inc. - d/b/a Trulieve (#RMD1365)
112. Life Essence, Inc. - d/b/a Trulieve (#RMD1735)
113. Life Essence, Inc. - d/b/a Trulieve (#RMD1736)

Commissioner Stebbins moved to take a Thirty-minute lunch recess.

- Commissioner Concepcion seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Yes
- The Commission unanimously approved taking a Thirty-minute lunch recess, returning at 1:30 PM (03:30:47)

9) Commission Discussion and Votes

1. Ratification of Enforcement Action

i. Commissi4bros, Inc. d/b/a East Coast Pharms

- Enforcement Counsel Rebecca Lopez (Enforcement Counsel Lopez) and Associate Enforcement Counsel Jacob Nielson (Associate Enforcement Counsel Nielson) gave an update and overview on the topic.
- The Chair thanked Enforcement Counsel Lopez and Associate Enforcement Counsel Nielson for their work and leadership on the topic.



- Commissioner Roy thanked Enforcement Counsel Lopez and Associate Enforcement Counsel Nielson for their work and leadership on the topic.
- Commissioner Concepcion thanked Enforcement Counsel Lopez and Associate Enforcement Counsel Nielson for their work and leadership on the topic.
- Commissioner Stebbins asked a clarifying question regarding the next steps if the Commission were to approve the ratification of enforcement action and whether the municipality would be notified.
 - Associate Enforcement Counsel Nielson noted that historically it had not been the Commission's practice to notify the municipality but noted that the enforcement action would be posted on the Commission website.
- The Chair noted that it would be good policy to notify the municipalities and local law enforcement entries when the Commission takes enforcement actions on a licensee.
 - The Executive Director noted that he agreed that it would be good practice to notify the municipality and noted that it would be good practice to also notify other States as it relates to Multi-State Operators and provided further clarity into the Commission's practice of partnering with local entries as it related to inspection and investigations.
- Commissioner Roy noted that the investigatory report noted diversion.
 - The Executive Director confirmed that the report did note diversion and noted that the diversion would be a matter for law enforcement as well.
- Commissioner Stebbins moved to ratify the Stipulated Agreement for Commis4bros, Inc. d/b/a East Coast Pharms.
- Commissioner Roy seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O'Brien – Abstained
- The Commission approved the Ratification of the Stipulated Agreement, by a vote of four in favor and one abstention.

2. Vote on Executive Session Minutes

- The Chair gave an update and overview on the topic.
- July 9, 2020
 - The Chair asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
 - Commissioner Stebbins moved to approve the minutes for July 9, 2020, Commission public meeting.
 - Commissioner Concepcion seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes



- Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
- The Commission approved the minutes for the July 9, 2020, Commission Executive Session Minutes by a vote of four in favor and one abstention.
- June 9, 2022
 - The Chair asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
 - Commissioner Stebbins moved to approve the minutes for June 9, 2022, Commission public meeting.
 - Commissioner Roy seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Abstained
- The Commission approved the minutes for the June 9, 2022, Commission public meeting by a vote of four in favor and one abstention.

3. Upcoming Anticipated Public Meeting Topics

- Commissioner Stebbins gave an update and overview on the topic and noted his want to connect with the Chair on next steps.

11) New Business the Chair Did Not Anticipate at the Time of Posting – 03:52:30

- No new items were identified.

12) Next Meeting Date

- The Chair noted that the next meeting would be on October 13th, 2022.
- The Chair gave a tentative schedule for the remainder of the calendar year.
- Commissioner Concepcion asked when the Commission will decide whether to have a December meeting.
 - The Chair noted that it was her hope to decide whether to hold a December meeting soon.

13) Adjournment – 03:55:45

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



- Chair O'Brien – Yes
- The Commission unanimously approved the motion.



Ember Gardens Cape Cod, LLC
0195-COO-03-0722

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Ember Gardens Cape Cod, LLC

| License Number | License Type |
|----------------|--------------|
| MR284542 | Retail |

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

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

| Entity | Role |
|------------------------------------------------|----------------------------------------|
| Anita Halani Orleans Cape Cod Investment, Inc. | Entity with Direct or Indirect Control |

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

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

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

RECOMMENDATION

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

1. The licensee and proposed parties may now effectuate the approved change.



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



Temescal Wellness of Massachusetts, LLC
0194-COO-01-0922

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Temescal Wellness of Massachusetts, LLC

| License Number | License Type |
|----------------|------------------------------------|
| MC281550 | Cultivation |
| MP281402 | Product Manufacturing |
| MR281309 | Retail |
| MR281588 | Retail |
| MR282033 | Retail |
| MTC705 | Medical Marijuana Treatment Center |
| MTC965 | Medical Marijuana Treatment Center |
| MTC985 | Medical Marijuana Treatment Center |

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

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

| Individual | Role |
|-------------------|----------------------------------------|
| Gerald Lindenmuth | Person with Direct or Indirect Control |

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

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

RECOMMENDATION

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



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



Curaleaf Processing, Inc.

REN281303

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Curaleaf Processing, Inc.
241 Riverview Avenue, Newton, MA 02466

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

Marijuana Research Facility

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

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

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

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use cultivation, product manufacturing, and retail applications/licenses under the names of Curaleaf Massachusetts, Inc. and Curaleaf North Shore, Inc.

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

| Individual | Role |
|---------------|---------------------------------------|
| Jessie Kater | Person Having Direct/Indirect Control |
| Boris Jordan | Person Having Direct/Indirect Control |
| Andrey Blokh | Person Having Direct/Indirect Control |
| Matthew Darin | Person Having Direct/Indirect Control |
| Edward Kremer | Person Having Direct/Indirect Control |

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

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| Entity | Role |
|----------------|-------------------------------------------------------------|
| Curaleaf, Inc. | Entity Having Direct/Indirect Control / Capital Contributor |

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on December 2, 2021.
8. The applicant conducted a community outreach meeting on November 15, 2021 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the City/Town of Newton on August 29, 2022 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

| # | Goal |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Give hiring preference to individuals from areas of disproportionate impact to ensure inclusion in the legal cannabis industry with a goal of hiring 5% of its employees from Boston, Chelsea, or Revere and 10% of individuals who have past drug convictions. |
| 2 | Donate a minimum of \$5,000 annually to organizations empowering individuals in disproportionate impact areas, specifically, Big Hope Project, Inc. |

BACKGROUND CHECK REVIEW

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

MANAGEMENT AND OPERATIONS PROFILE REVIEW

13. The applicant states that it can be operational upon receiving the provisional and final licenses.
14. The applicant's proposed hours of operation are the following:



| Day(s) | Hours of Operation |
|---------------------------------|------------------------|
| Monday-Tuesday; Thursday-Sunday | 7:00 a.m. to 7:00 p.m. |
| Wednesday | 7:30 a.m. to 7:00 p.m. |

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

| # | Goal |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit 40% Women; 5% Veterans; 2% People with Disabilities; 10% Minorities; and 10% LGBTQ+. |
| 2 | Source and add 420 new diverse suppliers and organizations from underrepresented communities within the cannabis ecosystem that are 45% Minorities; 40% Women; 5% Veterans; 5% People with Disabilities; and 5% LGBTQ+. |

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

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

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



Delivered, Inc.

MDA1303

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Delivered, Inc.
75 Green St., Clinton, MA 01510

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

Marijuana Delivery Operator

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

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

| Type | Status | Location |
|-----------------------------|---------------------|----------|
| Marijuana Delivery Operator | Provisional License | Holyoke |
| Marijuana Courier | Pre-Certification | N/A |

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use cultivation and a Marijuana Courier Pre-Certification under the name of Tripps Tree Farm, LLC and Florencia, LLC

4. The applicant was pre-certified by the Commission for Marijuana Delivery Operator on August 30, 2021. Pursuant to 935 CMR 500.101(2)(b), the applicant demonstrated a propensity to successfully operate a Marijuana Establishment.
5. List of all required individuals and their roles in the Marijuana Establishment:

| Individual | Role |
|---------------|---------------------------------------|
| Ruben Seyde | Person Having Direct/Indirect Control |
| Jackson Mejia | Person Having Direct/Indirect Control |

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6. 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.

7. Applicant's priority status:

Expedited Applicant (Social Equity Program Participant)
(Ruben Seyde / 51% majority ownership / SE303970)

8. The applicant and municipality executed a Host Community Agreement on June 2, 2022.
9. The applicant conducted a community outreach meeting on May 2, 2022 and provided documentation demonstrating compliance with Commission regulations.
10. The Commission received a municipal response from the City/Town of Clinton on October 6, 2022 stating the applicant was in compliance with all local ordinances or bylaws.
11. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

| # | Goal |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Reduce the economic and regulatory barriers to enter into commercial adult use cannabis industry by providing mentoring, professional and technical services, and access and introductions to potential sources of capital to five (5) Holyoke residents. |
| 2 | Create a Social Impact Fund to provide at least two (2) individuals from Holyoke Fitchburg or Worcester, a scholarship to be used towards a degree from an accredited college or university. |

BACKGROUND CHECK REVIEW

12. 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.
13. There were no concerns arising from background checks on the individuals or entities associated with the application.

MANAGEMENT AND OPERATIONS PROFILE REVIEW

14. The applicant states that it can be operational within eight (8) months of receiving the provisional license(s).



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

| Day(s) | Hours of Operation |
|---------------|------------------------|
| Monday-Sunday | 9:00 a.m. to 9:00 p.m. |

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

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

| # | Goal |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit a minimum of 50% women, 25% minorities, 10% veterans, 10% persons with disabilities, and 10% LGBTQ+ for its hiring initiatives. |
| 2 | Contract with suppliers, vendors, and service providers who are 25% women, 25% minorities, 20% veterans, 10% LGBTQ+, 10% persons with disabilities owned. |

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

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

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



Debilitating Medical Condition Treatment Centers

MRN281621

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Debilitating Medical Condition Treatment Centers
424 State Rd., Whately, MA 01373

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

Retail

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

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

| Type | Status | Location |
|-----------------------------------------------------------|------------------------|----------------|
| Product Manufacturing | Commence Operations | Whately |
| Product Manufacturing | Provisionally Approved | Agawam |
| Cultivation, Tier 1/Indoor (up to 5,000 sq. ft.) | Provisional License | Whatley |
| Cultivation, Tier 10/Outdoor (80,001 – 90,000 sq. ft.) | Commence Operations | Whatley |
| MTC | Provisional License | Whately-Agawam |

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

| Individual | Role |
|----------------|---------------------------------------|
| Grant Guelich | Person Having Direct/Indirect Control |
| David Goldblum | Person Having Direct/Indirect Control |
| Bradley Joseph | Person Having Direct/Indirect Control |
| Adam Firsell | Person Having Direct/Indirect Control |
| Samuel Hanmer | Person Having Direct/Indirect Control |

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| | |
|--------------------|---------------------------------------|
| Jared Glanz-Berger | Person Having Direct/Indirect Control |
| John Hanmer | Person Having Direct/Indirect Control |

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

| Entity | Role |
|----------------------------------|---------------------------------------|
| Englewood Managements, LLC | Entity Having Direct/Indirect Control |
| Jin Yang MA, LLC | Entity Having Direct/Indirect Control |
| Core High Yield MA, LLC | Entity Having Direct/Indirect Control |
| MidCo CHY MA, LLC | Entity Having Direct/Indirect Control |
| JointCo, LLC | Entity Having Direct/Indirect Control |
| JointCo, JGB, LLC | Entity Having Direct/Indirect Control |
| Core High Yield Investments, LLC | Entity Having Direct/Indirect Control |
| Shine Yingala Holdings, LLC | Entity Having Direct/Indirect Control |
| 22 Squared Holdings, LLC | Entity Having Direct/Indirect Control |
| Core High Yield Management | Entity Having Direct/Indirect Control |
| JointCo Manager, LLC | Entity Having Direct/Indirect Control |
| DMC | Capital Contributor |

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on June 2, 2021.
8. The applicant conducted a community outreach meeting on January 24, 2022 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent a municipal notice with a copy of the application to the City/Town of Whately on August 8, 2022. The Commission did not receive a response within 60 days pursuant to 935 CMR 500.102(1)(d).
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

| # | Goal |
|---|------------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit 25% of its staff who are past or present residents of Greenfield and/or other ADI's including Holyoke and Amherst. |
| 2 | Provide industry-specific training for ten (10) individuals who are past and present residents of Greenfield and other ADI's |

BACKGROUND CHECK REVIEW



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

MANAGEMENT AND OPERATIONS PROFILE REVIEW

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

| Day(s) | Hours of Operation |
|---------------|-------------------------|
| Monday-Sunday | 7:00 a.m. to 10:00 p.m. |

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

| # | Goal |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit 35% minorities, 35% women, 35% veterans, 35% people with disabilities and 5% LGBTQ for its hiring initiatives. |
| 2 | Develop an internal mentorship program to bolster job retention and foster a positive team atmosphere with a goal of retaining 50% of its employees that enter the program over a year period, with the goal of seeking to promote 25% of the employees that complete the program with 20% female, 20% LGBTQ+ and 15% veteran. |

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

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



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



Ember Gardens Production, LLC

MCN283722

MPN282196

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Ember Gardens Production, LLC
198 Mill Village Road, Deerfield, MA 01342

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 one (1) time for additional information.

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

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

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use cultivation, product manufacturing, retail and marijuana courier applications and/or licenses under the names of Fuego Farms, Inc., Ember Gardens Delivery, LLC, Ember Gardens Boston, LLC, Ember Gardens Cape Cod, LLC, and Ember Gardens NBP, LLC.

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

| Individual | Role |
|--------------------|---------------------------------------|
| Shane Hyde | Person Having Direct/Indirect Control |
| Daniel Gillan | Person Having Direct/Indirect Control |
| George Friedlander | Person Having Direct/Indirect Control |
| Stephen Soscia | Person Having Direct/Indirect Control |



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

| Entity | Role |
|-----------------------------|-------------------------------------------------------------|
| Ember Gardens Holdings, LLC | Entity Having Direct/Indirect Control / Capital Contributor |
| NEC Capital, LLC | Entity Having Direct/Indirect Control |

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on May 4, 2022.
8. The applicant conducted a community outreach meeting on March 24, 2022 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent a municipal notice with a copy of the application to the City/Town of Deerfield on August 8, 2020. The Commission did not receive a response within 60 days pursuant to 935 CMR 500.102(1)(d).
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

| # | Goal |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Provide an annual donation in the amount of \$16,000 to CCOE in order to provide scholarships to four (4) students who have been disproportionately harmed by the war on drugs. |
| 2 | Recruit at least one (1) of the sponsored students from the scholarship program who has been disproportionately impacted by the war on drugs or is a spouse or family member disproportionately impacted by the war on drugs for its hiring initiatives. |

BACKGROUND CHECK REVIEW

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

MANAGEMENT AND OPERATIONS PROFILE REVIEW



13. The applicant states that it can be operational within one 1 ½ years of receiving the provisional license(s).

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

| Day(s) | Hours of Operation |
|---------------|-----------------------|
| Monday-Sunday | Open 24 hours per day |

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

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

| # | Goal |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit 25% Woman; 25% Minorities; 5% Veterans; 5% Persons with disabilities; and 5% LGBTQ+ for general staff, management and executive positions |
| 2 | Cultivate diversity among suppliers, vendors, and service providers by contracting with 7% Woman; 7% Minorities; 2% Veterans; 2% Persons with disabilities; and 2% LGBTQ+ -Owned business enterprises. |

17. Summary of cultivation plan (if applicable):

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

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

| # | Product |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Flower Products (1gram pre-rolled joints sold individually and as multi-packs; 1/2 gram pre-rolled joints sold individually and as multi-packs; Cannagar; "Infused Cannabis" - cannabis flower combined with cannabis extracts) |
| 2 | Extracts (Distillate; Rick Simpson Oil; Wax; Shatter; Budder; Sap; Crumble; Live Resin; Bubble Hash; Rosin; Vaporizer Cartridges.) |

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.

Provisional License Executive Summary 3



3. Final licensure is subject to the applicant providing Commission staff, upon inspection, with a detailed list of all proposed products to be produced with specific information as to types, forms, shapes, colors, and flavors.
4. The applicant shall cooperate with and provide information to Commission staff.
5. Provisional licensure is subject to the payment of the appropriate license fee.

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



Greenwayv, Inc.

MCN283707

MPN282209

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Greenwayv, Inc.
174 Mashapaug Rd, Holland, MA 01521

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

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

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

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

| Individual | Role |
|---------------------|---------------------------------------|
| Christopher Allison | Person Having Direct/Indirect Control |
| Jacob LaMountain | Person Having Direct/Indirect Control |
| Carolyn Reardon | Person Having Direct/Indirect Control |
| Michael Skowron | Person Having Direct/Indirect Control |

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

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

6. Applicant's priority status:

General Applicant

Provisional License Executive Summary 1



7. The applicant and municipality executed a Host Community Agreement on October 22, 2021.
8. The applicant conducted a community outreach meeting on May 23, 2022 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent a municipal notice with a copy of the application to the City/Town of Holland on August 26, 2022. The Commission did not receive a response within 60 days pursuant to 935 CMR 500.102(1)(d).
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

| # | Goal |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Donate an amount equal to one and a half (1.5%) of its annual net profit to the Ohketeau Cultural Center to benefit Massachusetts residents disproportionately impacted by the war on drugs. |
| 2 | Assist at least on (1) disproportionately harmed applicant by providing financial investment. |

BACKGROUND CHECK REVIEW

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

MANAGEMENT AND OPERATIONS PROFILE REVIEW

13. The applicant states that it can be operational within nine (9) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Cultivation

| Day(s) | Hours of Operation |
|---------------|--------------------|
| Monday-Sunday | Open 24 hours |

Product Manufacturing

| Day(s) | Hours of Operation |
|-----------------|-----------------------|
| Monday-Friday | 9:00 a.m. – 5:00 p.m. |
| Saturday-Sunday | Closed |



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

| # | Goal |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit 30% women; 30% people of color (particularly Black, African American, Latinx and Indigenous people), 20% veterans, 10% LGBTQ+, and 10% persons with disabilities. |
| 2 | Support and enhance industry and community diversity by contracting with 40% of diverse businesses. |

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 | Oil |
| 2 | Shatter |
| 3 | Wax |
| 4 | Capsules |

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

1. Final license is subject to inspection to ascertain compliance with Commission regulations.
2. Final license is subject to inspection to ascertain compliance with applicable state laws, local codes, ordinances or bylaws, and local licensing requirements.
3. Final licensure is subject to the applicant providing Commission staff, upon inspection, with a detailed list of all proposed products to be produced with specific information as to types, forms, shapes, colors, and flavors.
4. The applicant shall cooperate with and provide information to Commission staff.
5. Provisional licensure is subject to the payment of the appropriate license fee.

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



I & I Rose Garden, LLC

MRN284031

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

I & I Rose Garden, LLC
22 Birch St., Boston, MA 02131

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 |
|-----------------------|---------------------|----------|
| Product Manufacturing | Provisional License | Boston |

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

| Individual | Role |
|----------------|-------------------------------------------------------------|
| Kijana Rose | Person Having Direct/Indirect Control / Capital Contributor |
| Ryan Casale | Person Having Direct/Indirect Control / Capital Contributor |
| Michaela Duffy | Person Having Direct/Indirect Control / Capital Contributor |

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

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



6. Applicant's priority status:

Economic Empowerment Priority Applicant
(Kijana Rose / 89% ownership / EE201827)

7. The applicant and municipality executed a Host Community Agreement on August 13, 2021.
8. The applicant conducted a community outreach meeting on September 6, 2022 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the City/Town of Boston on October 13, 2022 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

| # | Goal |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit 25% Boston residents (targeting neighboring Census tracts 90100, 90200, 90300, 90600, 91900, 92000, 92300, 92400, 110201, and 980101); 25% Lynn residents; 10% Chelsea residents; 10% Revere residents for its hiring initiatives. |
| 2 | Collaborate with Sisters Unchained, in developing an apprenticeship program aimed at promoting women who have disproportionately harmed by cannabis prohibition. |
| 3 | Provide industry specific virtual seminars to individuals who have been disproportionately harmed by cannabis prohibition or are residents of Boston, Lynn, Revere, Chelsea, Fall River, New Bedford, Lowell, Worcester and Haverhill for up to 50 seats. |
| 4 | Donate 1% of annual revenue to Sisters Unchained. |

BACKGROUND CHECK REVIEW

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

MANAGEMENT AND OPERATIONS PROFILE REVIEW

13. The applicant states that it can be operational within two (2) months of receiving the provisional license(s).



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

| Day(s) | Hours of Operation |
|-----------------|-------------------------|
| Monday-Thursday | Closed |
| Friday - Sunday | 8:00 a.m. to 10:00 p.m. |

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

| # | Goal |
|---|-------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit 75% women, 50% minorities, 10% veterans, 10% persons with disabilities, and 20% persons who identify as LGBTQ+. |
| 2 | Pay hourly employees a minimum wage of \$20 per hour and salaried employees no less than 70K per year. |

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

The applicant will obtain marijuana or marijuana products by contracting with other licensed establishments.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

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

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



Natural Agricultural Products, LLC

MRN284177

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Natural Agricultural Products, LLC
1437 Bedford Street, Abington, MA 02351

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

Retail

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

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

| Type | Status | Location |
|-----------------------------------------------------|---------------------|----------|
| Cultivation, Tier 2/Indoor (5,001-10,000 sq.ft.) | Provisional License | Brockton |
| Product Manufacturing | Provisional License | Brockton |

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

| Individual | Role |
|------------------|---------------------------------------|
| Gary Leonard | Person Having Direct/Indirect Control |
| Kathryn Redden | Person Having Direct/Indirect Control |
| David Willette | Person Having Direct/Indirect Control |
| Keshaudas Pahuja | Person Having Direct/Indirect Control |

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

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



6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on April 28, 2021.
8. The applicant conducted a community outreach meeting on June 14, 2022 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the City/Town of Abington on August 9, 2022 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

| # | Goal |
|---|-----------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit Massachusetts residents, with a selective hiring process ensuring no less than 20% of its employees have past drug convictions. |
| 2 | Provide mentoring and professional training to any Brockton and/or Abington residents and employees. |
| 3 | Donate volunteer hours and \$25,000 to the Brockton Champion Plan. |

BACKGROUND CHECK REVIEW

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

MANAGEMENT AND OPERATIONS PROFILE REVIEW

13. The applicant states that it can be operational within seven (7) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

| Day(s) | Hours of Operation |
|---------------|------------------------|
| Monday-Sunday | 8:00 a.m. to 8:00 p.m. |

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



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

| # | Goal |
|---|---------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit 20% women; 15% minorities; 10% veterans; 5% persons with disabilities; and 5% LGBTQ+. |
| 2 | Provide one annual cultural sensitivity training for all employees including specific training for employees in management positions. |

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

The applicant will obtain marijuana or marijuana products by contracting with other licensed establishments.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

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

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



Northeastcann, Inc.

MRN284438

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Northeastcann, Inc.
61 GAR Highway, Swansea, MA 02777

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

Retail

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

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

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

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use product manufacturing, and retail applications and/or licenses under the names of The Green Resource, Inc.

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

| Individual | Role |
|------------------|-------------------------------------------------------------|
| Ashim Joshi | Person Having Direct/Indirect Control |
| Gabriel Ruz | Person Having Direct/Indirect Control / Capital Contributor |
| Adam Demaral | Person Having Direct/Indirect Control |
| Jonathan Bernier | Person Having Direct/Indirect Control |

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



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

6. Applicant's priority status:

General Applicant

7. The applicant and municipality executed a Host Community Agreement on March 23, 2022.
8. The applicant conducted a community outreach meeting on June 17, 2022 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the City/Town of Swansea on August 23, 2022 stating the applicant was in compliance with all local ordinances or bylaws.
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

| # | Goal |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit at least ten (10) residents from Fall River, New Bedford, and Taunton and 30% of its workforce who have past drug convictions for its hiring initiatives. |

BACKGROUND CHECK REVIEW

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

MANAGEMENT AND OPERATIONS PROFILE REVIEW

13. The applicant states that it can be operational within eight (8) months of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

| Day(s) | Hours of Operation |
|---------------|------------------------|
| Monday-Sunday | 8:00 a.m. to 8:00 p.m. |

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



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

| # | Goal |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit, at a minimum, one person of each category of the equitable demographic group being one woman, one individual that is a racial minority, one member of the LGBTQ+ community, one military veteran and one individual with a physical or mental disability for its hiring initiatives. |
| 2 | Source 10% of its independent contractors and third-party vendors from the demographic groups as follows: (2%) minorities, (2%) women, (2%) veterans, (2%) people with disabilities, and (2%) LGBTQ+. |

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

The applicant will obtain marijuana or marijuana products by contracting with other licensed establishments.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

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

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



The Blue Jay Botanicals

DOA100159

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

The Blue Jay Botanicals
d/b/a Boston Garden Dispensary
22 Chestnut Hill Avenue, Athol, MA 01331

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

Marijuana Courier

The application was reopened two (2) times for additional information.

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

| Type | Status | Location |
|-----------------------------|---------------------|----------|
| Retail | Commence Operations | Athol |
| Marijuana Delivery Operator | Pre-Certification | N/A |

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use cultivation, product manufacturing, and retail licenses under the names of Nuestra, LLC. and Commonwealth Farm 1761, Inc.

4. The applicant was pre-certified by the Commission for a Marijuana Courier license on December 14, 2021. Pursuant to 935 CMR 500.101(2)(b), the applicant demonstrated a propensity to successfully operate a Marijuana Establishment.
5. List of all required individuals and their roles in the Marijuana Establishment:

| Individual | Role |
|----------------|---------------------------------------|
| Renata Caines | Person Having Direct/Indirect Control |
| Ivelise Rivera | Person Having Direct/Indirect Control |

Provisional License Executive Summary 1



| | |
|--------------------|---------------------------------------|
| Shaquille Anderson | Person Having Direct/Indirect Control |
| Jonathan Tucker | Person Having Direct/Indirect Control |
| Tara Tucker | Person Having Direct/Indirect Control |

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

| Entity | Role |
|-------------------------------|---------------------------------------|
| Nuestra, LLC | Entity Having Direct/Indirect Control |
| Herban Legends of Boston, LLC | Entity Having Direct/Indirect Control |
| Mikaz, LLC | Entity Having Direct/Indirect Control |
| Commonwealth Farm 1761, Inc. | Entity Having Direct/Indirect Control |

7. Applicant's priority status:

Expedited Applicant

Economic Empowerment Priority Applicant
(Ivelise Rivera / 26% ownership / EE202121)

Social Equity Program Participant
(Renata Caines / 25% ownership / SE303838)

8. The applicant and municipality executed a Host Community Agreement on October 18, 2021.
9. The applicant conducted a community outreach meeting on December 22, 2021 and provided documentation demonstrating compliance with Commission regulations.
10. The Commission received a municipal response from the City/Town of Athol on October 11, 2022 stating the applicant was in compliance with all local ordinances or bylaws.
11. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

| # | Goal |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Host four (4) CORI sealing clinics annually to support Massachusetts residents who have past drug convictions. |
| 2 | Recruit at least 5% of staff that are Greenfield residents and at least 5% of staff that are Massachusetts residents who have past drug convictions. |

BACKGROUND CHECK REVIEW

12. There were no disclosures of any past civil or criminal actions, occupational license issues, or marijuana-related business interests in other jurisdictions.

Provisional License Executive Summary 2



13. There were no concerns arising from background checks on the individuals or entities associated with the application.

MANAGEMENT AND OPERATIONS PROFILE REVIEW

14. The applicant states that it can be operational within two (2) months of receiving the provisional license(s).
15. The applicant's proposed hours of operation are the following:

| Day(s) | Hours of Operation |
|---------------|---------------------------|
| Monday-Sunday | 10:00 a.m. to 9:00 p.m. |

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

| # | Goal |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit 50% women; 20% minorities; 5% veterans; 5% persons with disabilities; and 5% persons who identify as LGBTQ+ for its hiring initiatives. |
| 2 | Participate in at least one (1) job fair annually. |

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

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

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



Western Front, LLC
MRN284389

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Western Front, LLC
98 Winthrop Street, Cambridge, MA 02138

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

Retail

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

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

| Type | Status | Location |
|-------------------|---------------------|-----------|
| Retail | Commence Operations | Cambridge |
| Retail | Commence Operations | Chelsea |
| Marijuana Courier | Pre-Certification | N/A |

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

| Individual | Role |
|------------------|---------------------------------------|
| Marvin Gilmore | Person Having Direct/Indirect Control |
| Dennis Benzan | Person Having Direct/Indirect Control |
| Omwale Moses | Person Having Direct/Indirect Control |
| Timothy Flaherty | Person Having Direct/Indirect Control |

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

| Entity | Role |
|-----------|---------------------------------------|
| THC Trust | Entity Having Direct/Indirect Control |



6. Applicant's priority status:

Economic Empowerment Priority Applicant

(Timothy Flaherty / 10.3% ownership / EE202211)
(Marvin Gilmore Jr. / 9.17% ownership/ EE202211)
(Dennis Benzan / 9.17% ownership/ EE202211)
(Omowale Moses / 1.36% ownership/ EE202211)

(Additional individuals not required to be listed on the license application contribute ownership equity stakes towards overall ownership by Economic Empowerment Priority Applicant. The applicant's status as a Economic Empowerment Priority Applicant was verified on May 28, 2021 pursuant to 935 CMR 500.104(1)(b)(3).)

7. The applicant and municipality executed a Host Community Agreement on May 18, 2022.
8. The applicant conducted a community outreach meeting on July 12, 2022 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent a municipal notice with a copy of the application to the City/Town of Cambridge on August 19, 2022. The Commission did not receive a response within 60 days pursuant to 935 CMR 500.102(1)(d).
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

| # | Goal |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Providing mentoring, professional, and technical services by providing one (1) training for Chelsea residents, a geographical location designated as a disproportionately impacted area, each year that is attended by 20 people |
| 2 | Providing \$5,000 each year to the Chelsea Collaborative to support its endeavors in the City of Chelsea. |

BACKGROUND CHECK REVIEW

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

MANAGEMENT AND OPERATIONS PROFILE REVIEW



13. The applicant states that it can be operational within seven and a half (7 ½) months of receiving the provisional license(s).

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

| Day(s) | Hours of Operation |
|---------------|------------------------|
| Monday-Sunday | 9:00 a.m. to 9:00 p.m. |

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

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

| # | Goal |
|---|------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Recruit 20% Minorities, 20% Women, 5% Veterans, 5% People with Disabilities, 5% Individuals who identify as LGBTQ+ for its hiring initiatives. |
| 2 | Provide career development services to a minimum of eight (8) participants annually. |

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

The applicant will obtain marijuana or marijuana products by contracting with other licensed establishments.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

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

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



B Leaf Wellness Centre, LLC

MR281356

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

B Leaf Wellness Centre, LLC
24 W. Main Street, Ware, MA 01082

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

Retail

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

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

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on 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): September 21, 2022



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

Not applicable.

- d. Product Manufacturing Operation

Not applicable.

- e. Retail Operation

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

- i. Verification of identifications for access;
- ii. Layout of the sales floor; and



- iii. Availability and contents of adult-use consumer education materials.
- f. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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



Beacon Compassion, Inc.

MR284569

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Beacon Compassion, Inc.
d/b/a UpTop
1524 VFW Parkway, Boston, MA 02132

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

Retail

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

| Type | Status | Location |
|---------------------------------------------------------|------------------------|-----------------------|
| Retail | Provisional License | New Bedford |
| Cultivation, Tier 4/Indoor (20,001 – 30,000 sq. ft.) | Provisional License | Attleboro |
| Product Manufacturing | Provisional License | Attleboro |
| Retail | Provisionally Approved | Framingham |
| MTC | Provisional License | Attleboro-Boston |
| MTC | Commence Operations | Attleboro-Framingham |
| MTC | Provisional License | Attleboro-New Bedford |

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on May 12, 2022.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).

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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): September 28, 2022.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

Not applicable.

- d. Product Manufacturing Operation



Not applicable.

e. Retail Operation

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

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

f. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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



Capeway Cannabis, LLC

MR282446

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Capeway Cannabis, LLC
307 Tremont Street, Carver, MA 02330

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

Retail

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

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

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on March 10, 2022.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): October 4, 2022.
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.

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

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

a. Security

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

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

b. Inventory and Storage

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

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

c. Cultivation Operation

Not applicable.

d. Product Manufacturing Operation

Not applicable.

e. Retail Operation

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

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

f. Transportation



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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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



Community Growth Partners Northampton Operations, LLC

MC282162

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Community Growth Partners Northampton Operations, LLC
d/b/a Rebelle
20 Ladd Avenue, Northampton, MA 01060

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

Cultivation, Tier 3/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 | Commence Operations | Northampton |

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use retail licenses and marijuana courier licenses under the names of Community Growth Partners Great Barrington Operations, LLC and Community Growth Partners Delivery, Inc.

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on November 30, 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): September 20, 2022.
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

Not applicable.

e. Retail Operation

Not applicable.

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

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

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



Green Meadows Farm, LLC

MR284280

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Green Meadows Farm, LLC
50 Whalon Street, Suite C, 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):

| Type | Status | Location |
|------------------------------------------------------|-----------------------|-------------------------|
| Cultivation, Tier 3/Indoor (10,001 – 20,000 sq. ft.) | Commence Operations | Southbridge |
| Product Manufacturing | Commence Operations | Southbridge |
| Retail | Commence Operations | Southbridge |
| MTC | Commence Operations | Southbridge-Southbridge |
| MTC | Application Submitted | Southbridge-Fitchburg |

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on June 9, 2022.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

INSPECTION OVERVIEW

Final License Executive Summary 1



8. Commission staff inspected the licensee's facility on the following date(s): September 27, 2022.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

a. Security

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

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

b. Inventory and Storage

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

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

c. Cultivation Operation

Not applicable.

d. Product Manufacturing Operation

Not applicable.

e. Retail Operation



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

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

f. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

1. The licensee may possess and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Marijuana Establishments, or to consumers, until upon inspection, receiving permission from the Commission to commence full operations.
2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
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 River Cannabis Company, Inc.

MR282175

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Green River Cannabis Company, Inc.
398 Deerfield Street, Greenfield, MA 01301

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

Retail

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

| Type | Status | Location |
|--------|---------------------|-----------|
| Retail | Provisional License | Hopedale |
| Retail | Provisional License | Attleboro |

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).

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): September 27, 2022.

Final License Executive Summary 1



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

Not applicable.

- d. Product Manufacturing Operation

Not applicable.

- e. Retail Operation

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

- i. Verification of identifications for access;
- ii. Layout of the sales floor; and



- iii. Availability and contents of adult-use consumer education materials.
- f. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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



Holistic Health Group, Inc.

MR283126

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Holistic Health Group, Inc.
d/b/a Suncrafted
477 Wareham Street, Middleborough, MA 02346

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

Retail

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

| Type | Status | Location |
|---------------------------------------------------------|------------------------|-----------------------------|
| Cultivation, Tier 3/ Indoor 10,001 – 20,000 sq. ft.) | Provisional License | Middleborough |
| Product Manufacturing | Provisionally Approved | Middleborough |
| MTC | Commence Operations | Middleborough-Middleborough |

LICENSING OVERVIEW

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

INSPECTION OVERVIEW

Final License Executive Summary 1



8. Commission staff inspected the licensee's facility on the following date(s): October 12, 2022.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.

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

a. Security

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

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

b. Inventory and Storage

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

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

c. Cultivation Operation

Not applicable.

d. Product Manufacturing Operation

Not applicable.

e. Retail Operation



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

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

f. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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



KG Collective, LLC
MR284181

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

KG Collective, LLC
701-738B Mt. Auburn Street, Cambridge, MA 02138

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

Retail

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

| Type | Status | Location |
|--------|---------------------|----------|
| Retail | Provisional License | Boston |

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use retail licenses and marijuana courier under the names of KG Collective Brockton, LLC and KG Collective Delivery, LLC.

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on June 17, 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): September 29, 2022.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.

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

a. Security

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

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

b. Inventory and Storage

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

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

c. Cultivation Operation

Not applicable.

d. Product Manufacturing Operation

Not applicable.

e. Retail Operation



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

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

f. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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



Morando Brands, LLC

MP281488

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Morando Brands, LLC
319 Newburyport Turnpike Units 002/003, Rowley, MA 01969

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

Product Manufacturing

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

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

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on February 10, 2022.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): September 8, 2022.



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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

Not applicable.

- d. Product Manufacturing Operation

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

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

- e. Retail Operation



Not applicable.

f. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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

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

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



Root 2 Naturals, LLC

MB281675

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Root 2 Naturals, LLC
201 Daniel Shays Highway, Athol, MA 01331

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

Microbusiness (Cultivation and Product Manufacturing Operations)

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

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

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on 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): June 29, 2022.
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.

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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. Retail Operation



Not applicable.

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

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

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



Rooted In, LLC

MR284261

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Rooted In, LLC
d/b/a Rooted in Roxbury
331 Newbury Street, Boston, MA 02115

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

Retail

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

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

Please note that individuals and/or entities associated with the proposed application(s) are also associated with a Marijuana Delivery Operator application under the name of EnRoot Home Delivery, LLC.

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on February 10, 2022.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).



INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): October 12, 2022.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

Not applicable.

- d. Product Manufacturing Operation

Not applicable.

- e. Retail Operation



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

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

f. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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



Sira Naturals, Inc.
MP281613

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Sira Naturals, Inc.
5-7 Industrial Road, Milford, MA 01757

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

Product Manufacturing

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

| Type | Status | Location |
|----------------------------------------------------------|-----------------------|--------------------|
| Retail | Commence Operations | Somerville |
| Retail | Commence Operations | Watertown |
| Retail | Commence Operations | Boston |
| Cultivation, Tier 3/Indoor (10,001-20,000 sq. ft.) | Commence Operations | Milford |
| Product Manufacturing | Commence Operations | Milford |
| Marijuana Transporter with Other Existing ME Licenses | Commence Operations | Milford |
| Cultivation, Tier 2/Indoor (5,001-10,000 sq. ft.) | Commence Operations | Milford |
| Cultivation, Tier 8/Indoor (60,001-70,000 sq. ft.) | Final License | Milford |
| Marijuana Research Facility | Application Submitted | Milford |
| MTC | Commence Operations | Milford-Needham |
| MTC | Commence Operations | Milford-Somerville |
| MTC | Commence Operations | Milford-Watertown |



LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on July 15, 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): October 11, 2022.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

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

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

- b. Inventory and Storage

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



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

c. Cultivation Operation

Not applicable.

d. Product Manufacturing Operation

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

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

e. Retail Operation

Not applicable.

f. Transportation

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

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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



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

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



Solurge, Inc.
MC281300

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Solurge, Inc.
650 Beaulieu Street, Holyoke, MA 01040

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 |
|-----------------------|---------------------|-----------------|
| Retail | Final License | Holyoke |
| Product Manufacturing | Provisional License | Holyoke |
| MTC | Provisional License | Holyoke-Holyoke |

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): October 5, 2022.

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

- a. Security

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

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

- b. Inventory and Storage

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

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

- c. Cultivation Operation

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

Not applicable.

- e. Retail Operation



Not applicable.

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

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

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



Southcoast Apothecary, LLC

MR283075

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Southcoast Apothecary, LLC
d/b/a Ascend
95 Coggeshall Street, New Bedford, MA 02746

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

Retail

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

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

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use cultivation, product manufacturing, and/or retail applications/licenses under the names of Ascend Mass, LLC and MassGrow, LLC.

LICENSING OVERVIEW

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

INSPECTION OVERVIEW

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8. Commission staff inspected the licensee's facility on the following date(s): September 27, 2022.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.

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

a. Security

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

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

b. Inventory and Storage

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

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

c. Cultivation Operation

Not applicable.

d. Product Manufacturing Operation

Not applicable.

e. Retail Operation



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

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

f. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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



MARIJUANA ESTABLISHMENT RENEWALS

EXECUTIVE SUMMARY

COMMISSION MEETING: NOVEMBER 10, 2022

RENEWAL OVERVIEW

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

| | Licensee Name | License Number | Renewal Application Number | Location | Municipal Costs Disclosed |
|----|------------------------------------------------------|----------------|----------------------------|---------------|---------------------------|
| 1 | 6 Bricks, LLC. | MR283098 | MRR206151 | Springfield | \$0.00 |
| 2 | 617 Therapeutic Health Care, Inc. | MR283963 | MRR206242 | Boston | \$0.00 |
| 3 | B.O.T Realty, LLC | MR283113 | MRR206254 | Fitchburg | \$0.00 |
| 4 | Bada Bloom!, Inc. | MC283393 | MCR140335 | Tyngsborough | \$0.00 |
| 5 | COASTAL CULTIVARS, INC. | MC282052 | MCR140343 | Wareham | \$0.00 |
| 6 | Coil Brothers LLC | MP281388 | MPR243862 | Harvard | \$0.00 |
| 7 | Community Care Collective, Inc. | MR283742 | MRR206215 | Littleton | \$0.00 |
| 8 | Community Growth Partners Northampton Operations LLC | MC282162 | MCR140349 | Northampton | \$0.00 |
| 9 | dba EMJ LLC | MC282135 | MCR140353 | Cummington | \$0.00 |
| 10 | Emerald Grove, Inc. | MP281770 | MPR243872 | Middleborough | \$0.00 |
| 11 | Emerald Grove, Inc. | MC282426 | MCR140338 | Middleborough | \$0.00 |
| 12 | Evergreen Strategies, LLC. | MR283100 | MRR206248 | Belchertown | \$0.00 |
| 13 | Gibby's Garden LLC | MB281347 | MBR169298 | Uxbridge | \$0.00 |
| 14 | Green Era LLC | MR282001 | MRR206246 | Fitchburg | \$0.00 |
| 15 | Green Era LLC | MR282211 | MRR206245 | Fitchburg | \$0.00 |
| 16 | Green Era LLC | MR282902 | MRR206217 | Mendon | \$0.00 |
| 17 | Green Highland LLC | MC283173 | MCR140347 | Holyoke | \$0.00 |
| 18 | Green Highland LLC | MP281975 | MPR243883 | Holyoke | \$0.00 |
| 19 | Green Highland LLC | MR283775 | MRR206255 | Holyoke | \$0.00 |
| 20 | Greenhouse Naturals LLC | MR282334 | MRR206238 | Beverly | \$0.00 |
| 21 | Highdration LLC | MP282070 | MPR243858 | Lowell | \$0.00 |

ME Renewal Executive Summary 1



| | | | | | |
|----|-------------------------------------------------------|----------|-----------|--------------|------------|
| 22 | I & I Rose Garden LLC | MP281917 | MPR243868 | Boston | \$0.00 |
| 23 | Impressed LLC | MC282148 | MCR140316 | Hanson | \$0.00 |
| 24 | Just Healthy, LLC | MR281863 | MRR206264 | Northampton | \$0.00 |
| 25 | Just Healthy, LLC | MP281559 | MPR243889 | Northampton | \$0.00 |
| 26 | Just Healthy, LLC | MC281866 | MCR140360 | Northampton | \$0.00 |
| 27 | JustinCredible Cultivation, LLC | MC281313 | MCR140333 | Cummington | \$0.00 |
| 28 | Lifted Genetics, LLC | MC282183 | MCR140320 | Hopedale | \$0.00 |
| 29 | Littleton Apothecary LLC | MR283727 | MRR206218 | Littleton | \$0.00 |
| 30 | Mainely Productions LLC | MC281899 | MCR140357 | Uxbridge | \$0.00 |
| 31 | Massachusetts Green Retail, Inc. | MR284144 | MRR206224 | Lynn | \$0.00 |
| 32 | New England Cannabis Corporation, Inc. | MP281466 | MPR243867 | Holliston | \$0.00 |
| 33 | New England Cannabis Corporation, Inc. | MC281251 | MCR140328 | Holliston | \$0.00 |
| 34 | New Green LLC | MR282969 | MRR206210 | Egremont | \$9,749.14 |
| 35 | Nova Farms, LLC | MP281325 | MPR243869 | Attleboro | \$0.00 |
| 36 | Nova Farms, LLC | MC281263 | MCR140329 | Sheffield | \$0.00 |
| 37 | Other Side Agronomy, Inc. | MC282507 | MCR140342 | Worcester | \$0.00 |
| 38 | Pepperell Roots, LLC | MC283252 | MCR140366 | Pepperell | \$0.00 |
| 39 | Pepperell Roots, LLC | MP282002 | MPR243892 | Pepperell | \$0.00 |
| 40 | Power Fund Operations (fka) Silver Therapeutics, Inc. | MC281359 | MCR140375 | Orange | \$0.00 |
| 41 | ProVerde Laboratories, Inc. | IL281279 | ILR267910 | Milford | \$0.00 |
| 42 | Pudding Hill Farm LLC | MC283501 | MCR140374 | Blandford | \$0.00 |
| 43 | Smokey Leaf | MR284276 | MRR206257 | Greenfield | \$0.00 |
| 44 | TDMA LLC | MR282376 | MRR206236 | Worcester | \$0.00 |
| 45 | Temescal Wellness of Massachusetts, LLC | MP281402 | MPR243870 | Worcester | \$0.00 |
| 46 | Temescal Wellness of Massachusetts, LLC | MC281550 | MCR140330 | Worcester | \$0.00 |
| 47 | Terpene Journey, LLC | MR281612 | MRR206188 | Swampscott | \$0.00 |
| 48 | The Blue Jay Botanicals, Inc. | MR282243 | MRR206240 | Athol | \$0.00 |
| 49 | The Green Harbor Dispensary, LLC | MR281430 | MRR206233 | Provincetown | \$0.00 |
| 50 | The Hub Craft, LLC | MC282323 | MCR140314 | Fitchburg | \$0.00 |
| 51 | Volcann LLC | MR282925 | MRR206253 | Southampton | \$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.



MEDICAL MARIJUANA TREATMENT CENTER RENEWALS

EXECUTIVE SUMMARY

COMMISSION MEETING: NOVEMBER 10, 2022

RENEWAL OVERVIEW

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

| | Licensee Name | License Number | Location (Cultivation) | Location (Dispensing) |
|----|----------------------------|----------------|------------------------|-----------------------|
| 52 | 4BROS, INC. | RMD1325 | Holyoke | Holyoke |
| 53 | ACK Natural, LLC | RMD1627 | Nantucket | Nantucket |
| 54 | Apothca, Inc. | RMD1065 | Fitchburg | Lynn |
| 55 | ARL Healthcare | RMD1085 | New Bedford | Middleborough |
| 56 | Cresco HHH, LLC | RMD686 | Fall River | Fall River |
| 57 | Cultivate Leicester, Inc | RMD485 | Leicester | Leicester |
| 58 | Ermont, Inc | RMD225 | Quincy | Quincy |
| 59 | Sanctuary Medicinals, Inc. | RMD605 | Littleton | Gardner |
| 60 | Sanctuary Medicinals, Inc. | RMD1128 | Littleton | Woburn |

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

RECOMMENDATION

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



Review of the March 2021 Identifying Disproportionately Impacted Areas by Cannabis Prohibition in Massachusetts Study

November 2022

Massachusetts Cannabis Control Commission

Shannon O'Brien, Chair
Nurys Camargo, Commissioner
Ava Callender Concepcion, Commissioner
Kimberly Roy, Commissioner
Bruce Stebbins, Commissioner

Shawn Collins, Executive Director

Diversity, Equity, and Inclusion: Access and Equity Workgroup

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I. Introduction

In March of 2021, the Commission's Research Department and researchers from the University of Massachusetts Amherst Donohue Institute presented the Identifying Disproportionately Impacted Areas by Cannabis Prohibition in Massachusetts Study (UMass Study) to the Cannabis Control Commission (Commission). To solicit additional feedback and perspective, the study was referred to the Access and Equity internal workgroup to evaluate. Over the last year, the Access and Equity workgroup met with internal stakeholders, including Commissioners, leadership staff, and others who participated in the study development or equity programming. The Access and Equity workgroup also participated in meetings with external stakeholders, including licensees, equity program participants, and community leaders. This review presents findings and recommendations from the Access and Equity workgroup.



II. Legal Framework

Statutory Mandates & Regulatory Requirements Relating to the Identification of Areas of Disproportionate Impact.

The Commission's primary statutory mandate is to issue licenses and registrations for individuals and entities seeking to work in the regulated industry.¹ The Commission has broad authority, including "all the powers necessary or convenient to carry out and effectuate [this] purposes."² To effectuate this mandate, the Commission promulgates regulations that are "consistent with this chapter [94G] for the administration, clarification and enforcement of laws regulating and licensing" Marijuana Establishments ("ME").³

A related mandate requires the Commission to adopt "procedures and policies to promote and encourage full participation in the regulated marijuana industry by people from communities that have previously been disproportionately harmed by marijuana prohibition and enforcement and to positively impact those communities."⁴

Consistent with this mandate, the Commission adopted a policy of identifying Areas of Disproportionate Impact ("ADI"), or geographic areas associated with cannabis prohibition and enforcement. The Commission defines ADI as "a geographic area identified by the Commission for the purposes identified in M.G.L. c. 94G, § 4(a½)(iv), and which has had historically high rates of *arrest, conviction, and incarceration related to Marijuana crimes*."⁵

The current regulatory definition limits an ADI designation to geographic areas where there are high rates of arrests, convictions and incarceration related to cannabis crimes only. ADI does not include geographic areas which suffered harm from other drug prohibition and enforcement, such as opioids, cocaine, heroin, etc. Relatedly, Economic Empowerment Priority Applicants included criteria based on ADIs.⁶

¹The Commission shall approve a license application and issue a license if the prospective marijuana establishment has submitted an application in compliance with regulations and paid the required fees. G. L. c. 94G, § 5 (b)(1).

² G. L. c. 94G, § 4 (a).

³ G. L. c. 94G, § 4 (a1/2).

⁴ G. L. c. 94G, § 4 (a 1/2) (iv).

⁵ 935 CMR 500.002 and 501.002 (emphasis added).

⁶ See 935 CMR 500.002. and 501.002.



III. Historical Overview/Racial Disparities

Historical Overview

The Marihuana Tax Act of 1937 was the most significant effort by the federal government to regulate the use of cannabis in the United States in the Twentieth century. It was a federal government effort to outlaw all comportment involved in marijuana production and a precursor to the 1970 Federal Controlled Substance Act (CSA) and the *War on Drugs*.

In 1971, President Nixon declared the *War on Drugs*. In the decades following, America's prison population went from 300,000 to more than 2.0 million.⁷ Drug offenses accounted for about two-thirds of the increase in the federal inmate population and more than half of the state prison population.⁸ Black and Hispanic/Latino people disproportionately made up that increase.

There is a consensus that cannabis prohibition has been a failure: it has not met its goal of a drug-free America, has been expensive, and has created a great deal of collateral damage.⁹ The harms and failures of the *War on Drugs* and cannabis prohibition might be one of many contributing factors that led to a new push in the United States to legalize cannabis. The new cannabis industry began in 1996 when California became the first state to legalize cannabis for medical use. As of June 2022, 41 states, as well as the District of Columbia and Puerto Rico, have medical marijuana programs, and 23 of those have decriminalized cannabis or have full adult-use programs.¹⁰ In 2012 Massachusetts voters elected to legalize medical-use cannabis and adult-use cannabis in 2016. Massachusetts adult-use retailers have recorded over \$3 billion since the state first launched commercial sales in November 2018.¹¹

Impact of legalization

The new cannabis industry has yet to curtail the disproportionate impact of drug arrests, even in states that have legalized cannabis. Although the number of people arrested for marijuana possession and arrests rates has decreased in states where cannabis is legal or decriminalized,

⁷ Alexander, M. (2010). The War on Drugs and the New Jim Crow. Race, Poverty & the Environment,. from <https://urbanhabitat.org/files/Alexander.20th.17-1.pdf>

⁸ Alexander, M. (2010). The War on Drugs and the New Jim Crow. Race, Poverty & the Environment,. from <https://urbanhabitat.org/files/Alexander.20th.17-1.pdf>

⁹ Hudak, J. (2016). Marijuana: A Short History. Brookings Institution Press. <http://www.jstor.org/stable/10.7864/j.ctt1hfr1qj>

¹⁰ The Cannigma, Marijuana Legal States: US Map (2022) From: <https://cannigma.com/us-states-where-cannabis-is-legal/>

¹¹ Cannabis Control Commission (CCC). (May 18, 2022) Massachusetts Marijuana Establishments Surpass \$3 Billion in Gross Sales. From: <https://masscannabiscontrol.com/2022/05/massachusetts-marijuana-establishments-surpass-3-billion-in-gross-sales/>



the racial disparities in arrest rates in these states remain. Specifically, in every state that has legalized or decriminalized cannabis, Black people are still more likely to be arrested for possession than white people.¹² Furthermore, the increasing number of states legalizing, or decriminalizing cannabis has not reduced the national trends in racial disparities.¹³ Black people are on average are 3.64 times more likely to be arrested for cannabis possession.¹⁴ The same study found that Black people in Massachusetts were four times more likely than white people to be arrested for Marijuana possession; the data also found that the racial disparities in marijuana possession arrests in Massachusetts were larger in 2018 than in 2010. Further, in Massachusetts the racial disparities in incarceration increase as one progresses through the criminal justice system. The State significantly outpaced national racial disparity rates in incarceration, imprisoning Black people at a rate 7.9 times larger and Hispanic/Latino people at a rate 4.9 times larger than that of their white counterparts.¹⁵ Additionally, Black and Hispanic/Latino people sentenced to incarceration receive longer sentences than their white counterparts, with Black people receiving sentences that are an average of 168 days longer and Hispanic/Latino people receiving sentences that are an average of 148 days longer.¹⁶

In states where adult use is legal, the lack of public consumption venues disproportionately harms people who cannot consume in their households. If legalization occurs without providing consumption spaces open to the public, people who live in rental or public housing may not have a place to consume cannabis products without risking eviction or criminalization for public consumption. Per the National Low Income Housing Coalition, across all public housing, about 45% of residents are Black, and a little over 20% are Hispanic/Latino.¹⁷ As 65% of all people across all public housing are Black and/or Hispanic/Latino, the lack of public consumption venues disproportionately impacts these groups, who comprise a disproportionate percentage of people living in federally assisted housing.

¹² American Civil Liberties Union (ACLU). (2020). A Tale Of Two Countries: Racially Targeted Arrests In The Era Of Marijuana Reform. From <https://www.aclu.org/report/tale-two-countries-racially-targeted-arrests-era-marijuana-reform>

¹³ Id.

¹⁴ Id.

¹⁵ The Criminal Justice Policy Program (2020), Harvard Law School. Racial Disparities in the Massachusetts Criminal System. From: <https://hls.harvard.edu/wp-content/uploads/2022/08/Massachusetts-Racial-Disparity-Report-FINAL.pdf>

¹⁶ Id.

¹⁷ National Low Income Housing Coalition (NLIHC). (2012), Who Lives In Federally Assisted Housing? NLIHC. From: <https://nlihc.org/sites/default/files/HousingSpotlight2-2.pdf>



State of the Industry

Although cannabis legalization has proven lucrative for many, it has come short as it relates to bringing equity for people of color, sexual minorities, and women. Systemic racism in multiple systems (i.e., education systems, healthcare systems, and banking), impedes the ability of Black and Hispanic/Latino persons to access capital, and has left people of color less able to compete in the new capital-intensive cannabis industry.

Additionally, despite the Commission's current social equity efforts, Black and Hispanic/Latino people represent a small percentage of ownership and agents (employees, who work at a cannabis establishment) in the Massachusetts cannabis industry. As of August 2022, per the Massachusetts Cannabis Industry Portal registration data, Black people only represent 7.12% of agents and 6.54% of the owners and partners, and Hispanic/Latino people only represent 9.32% of agents and 4.32% of owners or partners. Finally, as of April 2020, agents in senior positions were 84% white, 2% Latino, 5% Black/African American, and 82%, male.¹⁸ In summary, not everyone benefits equally from access to the new cannabis industry or the benefits generated by the industry. The licensing process and high upfront costs limit the number of individuals with access to the capital required to become owners or partners. Although legislative and regulatory efforts have been made, Black and Hispanic/Latino people make up a very small percentage of agents in senior positions. The cannabis industry was brought in part by a promise of equity, but so far, the work remains ongoing.

¹⁸ Doonan, S. M., Johnson, J. K., Firth, C., Flores, A., & Joshi, S. (2022). Racial Equity in Cannabis Policy: Diversity in the Massachusetts Adult-Use Industry at 18-months. *Cannabis*, 5(1), 30-41 From: <https://publications.sciences.ucf.edu/cannabis/index.php/Cannabis/article/download/103/61>.



IV. People and Community

Throughout our internal and external interviews, there were several types of harms to a geographic area discussed. One being the harm of over policing; which is captured through analyzing location of arrest data. Another being the collateral impacts to a geographic area from community members' absence due to being placed in the criminal justice system – the farther one goes in the system, the greater the harm to the individual, family structure, and community at large.

Often, discussions centered around the residual impact of cannabis enforcement and prohibition on a geographic community. Feedback suggests that when identifying geographic areas that have been disproportionately harmed, both qualitative data and quantitative data; such as, convictions, incarceration, and even juvenile detention (to the extent available) is an important part of understanding and assessing which areas were harmed. Not only does the inclusion of this data better align with our statutory mandate, but it helps to identify geographic communities that have disproportionately endured the collateral effects of cannabis prohibition and enforcement.

While arrest data was included in the Gettman and UMass reports, the data did not include where the arrestee resided or other post arrest data that may assist with capturing the impact of cannabis enforcement on the individual, their family, and the community in which they reside. Research has shown that mass incarceration disrupts the social and economic fabric of neighborhoods and deepens the layers of inequality in a geographic area.¹⁹ For example, incarceration affects neighborhoods by breaking up families, weakening financial health and purchasing power, and discouraging investment.²⁰ Moreover, it often results in “changes in parent–child relationships, work–family conflict and shifts in labor force participation, [and] the intensification of poverty and need for public assistance.”²¹

Additionally, data supports a finding that specific demographic communities were expressly harmed more than others by cannabis prohibition and enforcement.

As noted in the “racial disparities” section, Black and Hispanic/Latino communities were

¹⁹ Center for Community Change(2017), The Relationship between Poverty & Mass Incarceration How mass incarceration contributes to poverty in the United States.

https://www.masslegalservices.org/system/files/library/The_Relationship_between_Poverty_and_Mass_Incarceration.pdf

²⁰ Id.

²¹ Joyce A. Arditti (2005), Families and Incarceration: An Ecological Approach,

https://www.researchgate.net/publication/276455241_Families_and_Incarceration_An_Ecological_Approach



disproportionately harmed at every level of enforcement – from the initial stop to incarceration.²² Research has also shown that these racial groups were harmed at a disproportionate rate, regardless of location and socio-economic conditions.²³ As such, the *War on Drugs* has been characterized by many as a *war on people*.

In the Gettman study, race was not a specific variable in the formula used to identify ADIs. And, while the UMass study does include racial demographics, the formula used for scoring and ranking areas is weighted equally among all four variables: *(0.5)*average annual number of drug arrests + average annual rate of drug arrests per 100,000 population + (0.5)*percent of people living in poverty + (0.5)*percent of residents who are Black and/or Latino*.

Feedback from our discussions suggest that when assessing which communities were disproportionately harmed, the demographic variable should reflect the increased harm incurred by Black and/or Hispanic/Latino, because of the disproportionate impact such cannabis enforcement had on these demographic communities, notwithstanding their socio-economic status and where they resided.

²² The Criminal Justice Policy Program (2020), Harvard Law School. Racial Disparities in the Massachusetts Criminal System. <https://hls.harvard.edu/content/uploads/2020/11/Massachusetts-Racial-Disparity-Report-FINAL.pdf>

²³ ACLU (2020), A Tale Of Two Countries: Racially Targeted Arrests In The Era Of Marijuana Reform. www.aclu.org/report/tale-two-countries-racially-targeted-arrests-era-marijuana-reform



V. Dataset Areas of Opportunity

First Study (Dr. Gettman)

The 2017 Impact of Drug and Marijuana Arrests on Local Communities in Massachusetts study (Dr. Gettman study) utilized arrest data from the Uniform Crime Reporting (UCR) program Summary Reporting System (SRS) of the Federal Bureau of Investigation (FBI) and economic data from the American Community Survey (ACS) conducted by the United States Census Bureau. The data represents the period of 2006 through 2010, three years prior to Massachusetts decriminalizing cannabis and two years following decriminalization. The study examined two different data sets for arrests, total drug arrests and marijuana arrests. Where ACS data was also available, total drug arrest data were available for 160 municipalities and marijuana arrest data were available for 148 municipalities.

As Massachusetts is divided into 351 municipalities (39 cities and 312 towns), total drug arrest data for 191 municipalities were not included in this analysis, and marijuana arrest data was not included for 203 municipalities.

This study did not consider the impact of conviction, sentencing, incarceration, or other sanctions. It also did not examine the impact of juvenile arrests on employment and educational opportunities. The researcher noted that these are all areas that should be assessed. While the researcher acknowledged that racial disparities in marijuana arrests have been convincingly established, the report remained race-neutral.

Second Study (UMass)

The UMass study utilizes arrest data from the FBI's National Incident Based Reporting System (NIBRS), and the Boston Police Department (BPD) and utilized the 2000 U.S. Census Bureau's Decennial Census and two ACS five-year databases for demographic (inclusive of race and ethnicity) and socio-economic data. The data represents the period from January 1, 2000, through December 31, 2017. The study examines arrest data for all drug arrests for 295 municipalities.

Not all Massachusetts municipalities contribute to NIBRS. By the end of 2000, 183 municipalities reported into the system. This grew to 294 reporting municipalities by the end of 2017. The city of Boston did not report to NIBRS from the period of 2000-2017; therefore, the Commission procured arrest data directly from the Boston Police Department. As Massachusetts is divided into 351 municipalities, arrest data was not included in this analysis for 55 municipalities.



It is important to note that the UCR program (which has existed in some form since 1920) was retired and transitioned to the NIBRS (created in the 1980s) as of January 1, 2021. The FBI notes that unlike the UCR, which is an aggregate monthly tally of crimes, NIBRS goes much deeper with the ability to provide circumstances and context for crimes including if the incident was cleared. Additionally, while the UCR only records the most serious crime in an incident, NIBRS records all crimes in an incident.

While the UMass study expanded to consider the percentage of Black and/or Latino residents it did not extend to consider the impact of conviction, sentencing, incarceration, or other sanctions. Through discussion with the Commission research team, we understand that post-arrest impact studies are typically done through qualitative research or a mixed methods study. This is due to quantitative data not being directly comparable if comparable at all. To compare the data in any way, would require cleaning and analyzation that is labor/time intensive and costly.

The UMass study also expanded upon the Dr. Gettman study, by considering socio-economic changes of municipalities but only considered these changes for the period of 2000-2017, rather than the changes that occurred since the 1971 declaration of the greater *War on Drugs*.

The UMass study also did not evaluate the impact of juvenile arrests on employment and educational opportunities. While the NIBRS datasets procured included juvenile arrest data, the BPD did not provide this information. As such, juvenile data was excluded from the study.

Associated costs of juvenile detention to both individuals and communities include a higher likelihood of going further through the carceral system, disruption to education, and both immediate and long-term adverse employment and economic outcomes. As is seen in adult arrest rates, there is a disproportionate impact on Black and/or Hispanic/Latino youth incarceration rates versus their white counterparts. Additionally, while the overall rate of youth incarceration in Massachusetts went down between 2003 and 2013, the disproportionate impact not only remained but increased. In 2003 Black youth were incarcerated at a rate 6.2 times larger than white youth; this increased in 2013 to 8.3 times larger; similarly in 2003, Hispanic/Latino youth were incarcerated at a rate 4.3 times higher than white youth which increased to 6.9 time larger than white youth by 2013.²⁴

²⁴ Policy Brief: Racial Disparities in Youth Commitments and Arrests (2016), The Sentencing Project, <https://www.sentencingproject.org/wp-content/uploads/2016/04/Racial-Disparities-in-Youth-Commitments-and-Arrests.pdf>



Studies have shown that when juveniles are detained, they are more likely to go deeper into the system; meaning, they are more likely to be referred to court and receive a serious disposition.²⁵ Juvenile detention interrupts one's education including some youth having a harder time returning to school and if they return, staying in school.²⁶ Studies also show that incarcerating young people has significant immediate and long-term negative employment and economic outcomes.²⁷

²⁵ The Dangers of Detention: The Impact of Incarcerating Youth in Detention and Other Secure Facilities (2013), A Justice Policy Institute Report by Barry Holman and Jason Zidenberg, https://justicepolicy.org/wp-content/uploads/2022/02/06-11_rep_dangersofdetention_jj.pdf

²⁶ Id

²⁷ Id



VI. Policy Recommendations and Considerations

Based on our review, we submit the following policy recommendations and considerations.

1. Cannabis arrest data and the UMass model

The 2021 UMass study identified ADI by using data from all drug arrests in its model. While data procured by UMass includes all drug arrest data, it can also be evaluated at the cannabis arrest data level. The Commission's regulatory definition of an ADI includes arrest, conviction, and incarceration data solely related to cannabis. Rerunning the model using only cannabis arrest data better aligns with our legislative and regulatory mandates, to encourage full participation in the regulated industry by those disproportionately harmed by cannabis prohibition and enforcement.

Data were not available for Lawrence at the time of the Gettman or UMass studies because the city did not report into NIBRS or UCR. However, the socio-economic characteristics of Lawrence are similar to Holyoke, New Bedford, and Brockton, all of which are included on the current ADI list. In 2017, Lawrence had an unemployment rate of 11%, with 24% of residents under the poverty line and over 80% of the population identifying as Latino. In the intervening years since the Gettman and UMass studies were conducted, the Commission has procured data for Lawrence. Therefore, any future analysis should include data for Lawrence in its review.

Recommendation: Rerun the analysis from the UMass model including data for Lawrence, using only cannabis arrest data.

The result of this work would be a list of municipalities scored using a formula that focuses on the impact of cannabis arrests. The Commission would then need to determine what municipalities are on the final ADI list.

Consideration:

Set a minimum DI score to identify municipalities. This will ensure the list includes all municipalities with a certain level of disproportionate impact.

Further Consideration: Given the disproportionate impact of cannabis prohibition on Black and/or Hispanic/Latino people, regardless of geographic area or socio-economic status, the Commission should consider if the equal weighting of all variables captures the harms endured by these communities.



The UMass study assigned scores using the following formula: $(0.5) \times \text{average annual number of drug arrests} + \text{average annual rate of drug arrests per 100,000 population} + (0.5) \times \text{percent of people living in poverty} + (0.5) \times \text{percent of residents who are Black and/or Latino}$.



2. State of the data analysis

The Gettman and UMass studies have utilized the data sources prescribed by the Commission after discussion and evaluation of what was most readily available. We understand that many sources of data could be considered, including, but not limited to, court records and municipal level police records. However, we recognize that record keeping is inconsistent and may not be complete and comparable across municipalities.

Recommendation: Conduct a state of the data analysis, to understand the universe of data available to researchers, as well as any costs and timelines associated with procurement, data cleaning, and analysis.

This analysis should consider the availability of quantitative and qualitative data from 1971 to the present. The state of the data analysis may include:

- Number and rates of adult cannabis arrests, convictions, and incarceration
- Number and rates of juvenile cannabis arrests, convictions, and detentions
- Percent of people living in poverty
- Percent of residents who report Black and/or Latino race/ethnicity
- Any other data that the Commission deems necessary

On completion of the state of the data analysis, the Commission will have a better understanding of data sources available, as well as the cost and time to procure and analyze the data. The Commission could then weigh the costs and benefits of procuring an additional study.



3. Census tract 7320.01

The Dr. Gettman report, *Identifying the Top 25% of Census Tracts According to Unemployment Data in The Largest Cities*, includes census tract 7320.01 in Worcester. On page four of the Dr. Gettman study he identified that this census tract satisfied the criteria to be included on the ADI list, as it had the highest level of unemployment in Worcester (18.4%). However, this census track was not included on the Commission's ADI list. Based on our review of the materials related to the Dr. Gettman study, we believe the failure to include this census track on the ADI list was based on a clerical error.

Recommendation: Add census tract 7320.01 to the Commission's current Areas of Disproportionate Impact list.



VII. In Closing

While these recommendations speak to how to utilize the ADI studies, this list is not the only tool the Commission has when striving to create and sustain an equitable industry. We acknowledge that the *War on Drugs* is a war on people, and the harms inflicted on Black, and Latino/Hispanic people occurred no matter where they live(d) in the Commonwealth. We support the Commission's ongoing work providing programming to those most harmed by cannabis prohibition and enforcement.

In addition, these recommendations may have resource implications, in terms of time, money and staff bandwidth. If the Commission chooses to act on any recommendations, we support the Executive Director in implementing the Commission's policy objectives.



Review of 2021 DI Study and Recommendations

Diversity, Equity, and Inclusion:
Access and Equity Workgroup

November 10, 2022

Tiixa Chukwuezi, Sabiel Rodriguez, Andrew Carter, and Meghan Dube



Agenda

1. Introduction
2. Legal Framework
3. Historical Overview and Racial Disparities
4. People and Community
5. Dataset Areas of Opportunity
6. Research Recommendation
7. Research Procurement Recommendations
8. Policy Considerations

Introduction

December 2017

- Report: *The Impact of Drug and Marijuana Arrests on Local Communities in Massachusetts*
 - January 2018: *The Impact of Drug and Marijuana Arrests Within the Largest Cities of Massachusetts*
 - April 2018: *Identifying the Top 25% of Census Tracts in Boston, Worcester, Springfield, and Lowell according to Unemployment Data (2006-2010)*
- Completed by Dr. Jon Gettman, Professor of Criminal Justice at Shenandoah University in Winchester, Virginia

March 2021

- Report: *Identifying Disproportionately Impacted Areas by Cannabis Prohibition in Massachusetts*
- Completed by the University of Massachusetts Amherst Donohue Institute



Legal Framework: Statutory Authority

- The Commission enjoys broad legal authority with “all the powers necessary or convenient to carry out and effectuate its purposes.” G. L. 94G, § 4(a). One of the purposes the Commission must effectuate is building and maintaining an inclusive and equitable industry that accounts for the past harms of marijuana prohibition and enforcement.
- The Commission’s authority includes, but is not limited to, the power to promulgate regulations that are “consistent with this chapter [94G] for the administration, clarification and enforcement of laws regulating and licensing marijuana establishments.” G. L. 94G, § 4(a1/2). The Commission has the authority to implement, clarify and enforce the laws regulating adult and medical use marijuana.
- The Commission shall approve a marijuana establishment license application and issue a license if: the prospective marijuana establishment has submitted an application in compliance with regulations made by the commission, the applicant satisfies the requirements established by the commission, the applicant is in compliance with this chapter and the regulations made by the commission and the applicant has paid the required fee [...]. G. L. c. 94G, § 5 (b)(1).



Legal Framework: Procedures and Policies to Encourage Full Participation in the Regulated Industry

- As part of our statutory mandate, the Commission must adopt "procedures and policies to promote and encourage full participation in the regulated marijuana industry by people from communities that have previously been **disproportionately harmed by marijuana prohibition and enforcement and to positively impact those communities.**" G. L. c. 94G, § 4 (a 1/2) (iv).
- One of the policies adopted by the Commission to promote full participation in the regulated industry was to identify geographic areas harmed by cannabis prohibition and enforcement, known as Area of Disproportionate Impact. The Commission defined Area of Disproportionate Impact as “a geographic area identified by the Commission for the purposes identified in M.G.L. c. 94G, § 4(a½)(iv), and which has had historically high rates of **arrest, conviction, and incarceration related to Marijuana crimes.**” 935 CMR 500.002 and 501.002.
- The current regulatory definition limits an Area of Disproportionate Impact to areas with high rates of arrests, convictions and incarceration related to cannabis crimes only, it does not include other drugs, such as opioids, cocaine, heroin, etc.



Racial Disparities: Historical Overview

- The Marijuana Tax Act of 1937
 - The Marihuana Tax Act of 1937 was the most significant effort by the federal government to regulate the use of cannabis in the United States in the Twentieth century.
- The War on Drugs
 - In 1971, President Nixon declared the War on Drugs. In the decades following America's prison population went from 300,000 to more than 2 million.
- Legalization:
 - Between the start of the new industry in 1996 and 2018, 18 states voted on 62 marijuana-related ballot measures.
 - Overall, Massachusetts adult-use retailers have recorded over \$3.3 billion since the state first launched commercial sales in November 2018.



Racial Disparities: Impact of Legalization

- Although the total number of people arrested for marijuana possession and rates of arrests have decreased in states where cannabis is legal or decriminalized, the racial disparities in arrest rates in these states remain.
 - In 2018, Black people were four times more likely than white people to be arrested for marijuana possession in Massachusetts.
- In Massachusetts, racial disparities increase as one progresses through the criminal justice system.
 - Massachusetts significantly outpaced national racial disparity rates in incarceration, imprisoning Black people at a rate 7.9 times more and Hispanic people at a rate 4.9 times more than that of white people.
- There is a lack of Social Consumption spaces in Massachusetts.
 - Per the National Low Income Housing Coalition, across all public housing, about 45% of residents are African American, and a little over 20% are Hispanic.

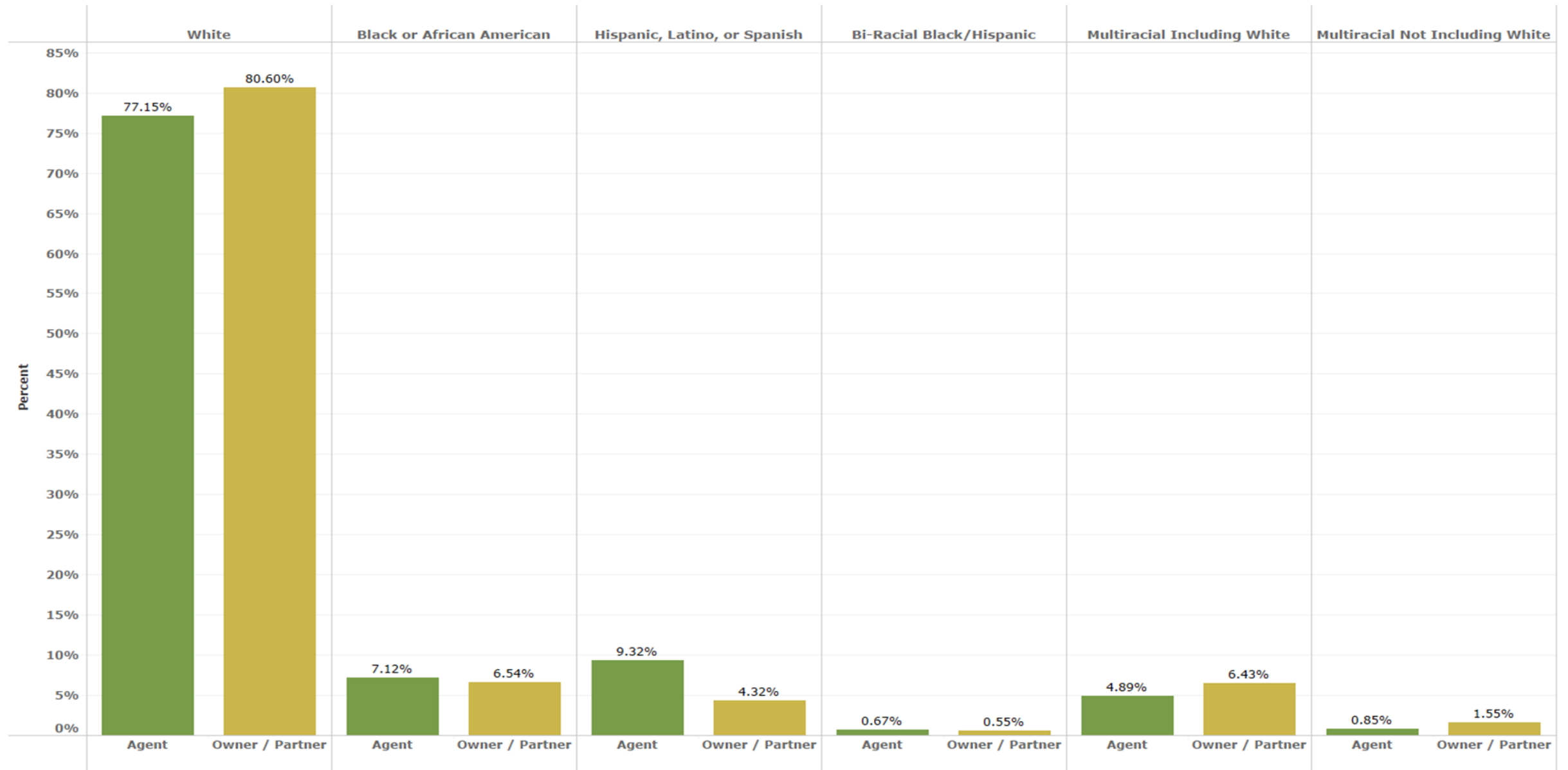


Racial Disparities: State of the Industry

- Systemic barriers, such as racism, and the disparities in the criminal justice system have left people of color less able to compete in the new capital-intensive cannabis industry. The Massachusetts cannabis industry was legalized with a promise of equity, but so far, the work remains ongoing.
- Black and Hispanic people represent a small percentage of owners and agents in the Massachusetts cannabis industry, despite the Commission's current social equity efforts, examples are below:
 - Expedited licensing review for Equity program participants and Disadvantaged Business Enterprises
 - Pre-certification and exclusive access to delivery and social consumption licenses
 - Fee waivers
 - Technical assistance and training
 - Mandatory Diversity Plans and Positive Impact Plans for all licensees

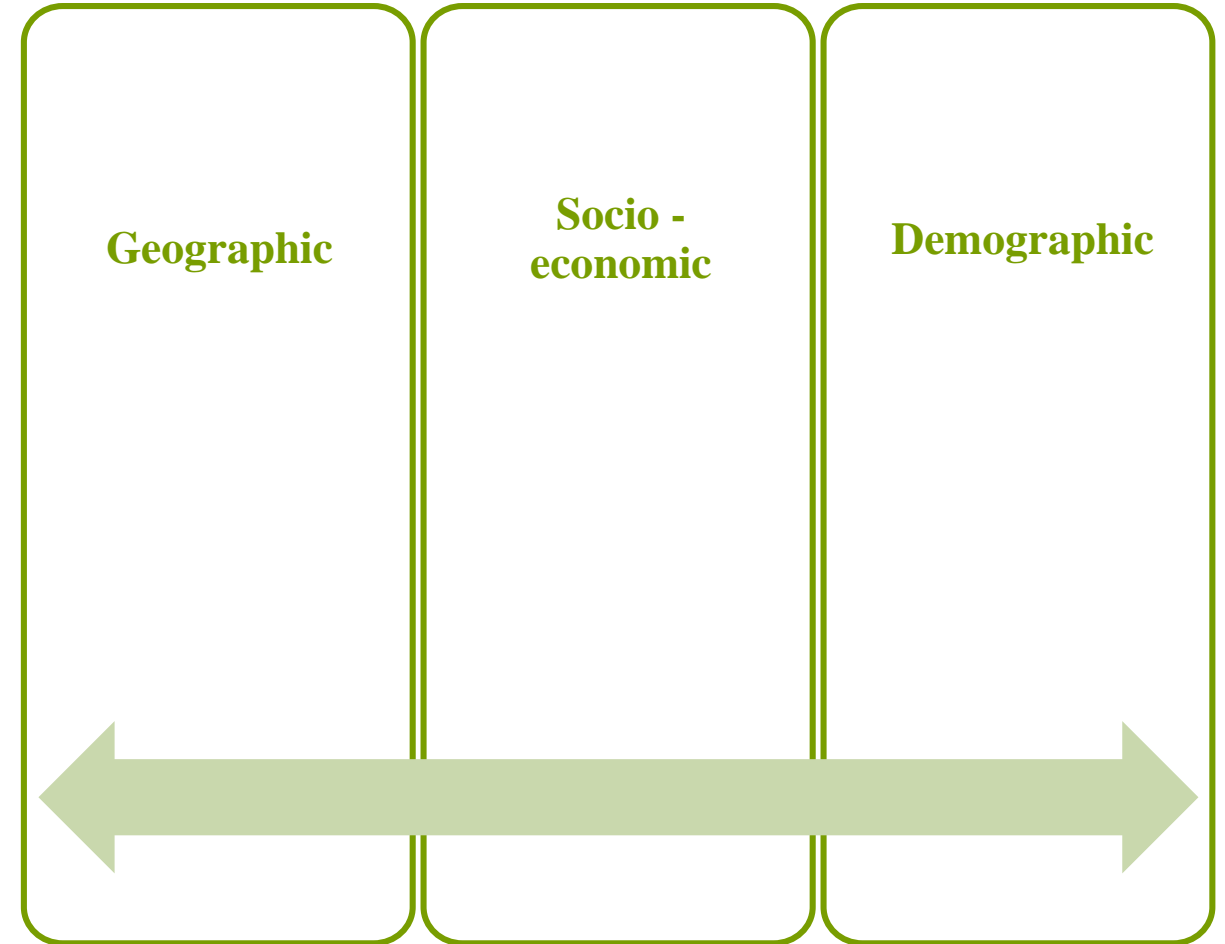


Percent of Agents and Owners/Partners (Commence Operations) by Race as of August 2022



People and Community

- How were geographic areas harmed by cannabis prohibition and enforcement?
- What data should be collected and assessed to capture the harms to a geographic area?
- Does the formula used to score areas of disproportionate impact account for the disproportionate harm to certain demographic communities?



Past and Current Study

Gettman Report

- Drug and marijuana arrest rates (2/3)
- Unemployment rates; Poverty level and Population size (1/3)
- *Race neutral*

UMASS Report

- Average annual number of drug arrests (0.5)
- Average annual rate of drug arrests per 100,000 population residents (0.5)
- Percent of people living in poverty (0.5)
- Percent of residents who are Black and/or Latino (0.5)

Dataset Areas of Opportunity: Gettman Study

Data Analyzed

- **Arrest data:** total drug and marijuana only drug arrest data from the Uniform Crime Reporting (UCR) program Summary Reporting System (SRS)
 - Total drug arrest data was available for 160 municipalities
 - Marijuana arrest data was available for 148 municipalities
- **Economic data:** from the American Community Survey (ACS)
- **Time period:** 2006 through 2010
 - Three years prior to Massachusetts cannabis decriminalization
 - Two years following Massachusetts cannabis decriminalization

Areas of Opportunity

- The researcher notes that racial disparities exist, yet the study was race neutral
- Alternative data sources that would allow for an increased number of municipalities to be considered
 - Total drug arrest UCR data was not available for 191 municipalities
 - Marijuana arrest UCR data was not available for 203 municipalities
- Impact of adult conviction, sentencing, incarceration or other sanctions
- Impact of juvenile arrests on employment and educational opportunities
- Quantitative and/or qualitative data for the period of 1971 (the declaration of the *War on Drugs*) to 2006, and 2011 through the present



Dataset Areas of Opportunity: UMass Study

Data Analyzed

- **Arrest data:** drug arrest data from the National Incident Based Reporting System (NIBRS) and the Boston Police Department (BPD)
 - Data was available for 295 municipalities
- **Demographic and socioeconomic data:** from the 2000 U.S. Census Bureau's Decennial Census and two ACS 5-year databases
- **Time period:** 2000 through 2017

Areas of Opportunity

- Alternative data sources that would allow for an increased number of municipalities to be considered
 - NIBRS data was not available for 55 municipalities
 - Data has since been obtained from Lawrence
- Impact of conviction, sentencing, incarceration or other sanctions
- Impact of juvenile arrests on employment and educational opportunities
- Socioeconomic changes of municipalities for the period of 1971 to the present
 - To account for the impact since the declaration of the greater War on Drugs as declared in 1971
- The formula used assigns equal weight to all variables, there is an opportunity to consider if race should be weighed more heavily to account for the War on People that the *War on Drugs* represents





Policy Recommendation & Considerations



Cannabis Arrest Data and the UMass Model

- **Recommendation:** Rerun the analysis from the UMass model, using only cannabis arrest data, include Lawrence data
 - Rerunning model using only cannabis arrest data better aligns to legislative and regulatory mandates to encourage full participation in the regulated industry by those disproportionately harmed by cannabis prohibition and enforcement
 - Commission's regulatory definition of ADI: means a geographic area identified by the Commission for the purposes identified in M.G.L. c. 94G, § 4(a½)(iv), and which has had historically high rates of arrest, conviction, and incarceration related to Marijuana crimes.
 - Study analyzed data from all drug arrests, but data was procured that can be analyzed at the cannabis arrest data level
- **Consideration 1:** Set a minimum DI score when creating a list – rather than a percentage of top ranking
- **Consideration 2:** Formula should account for disproportionate impact on Black and/or Hispanic/Latino people regardless of where reside in Commonwealth



State of the Data Analysis

- **Recommendation: Conduct a state of the data analysis to understand the universe of data available as well as costs and timelines associated with procurement, cleaning and analysis.**

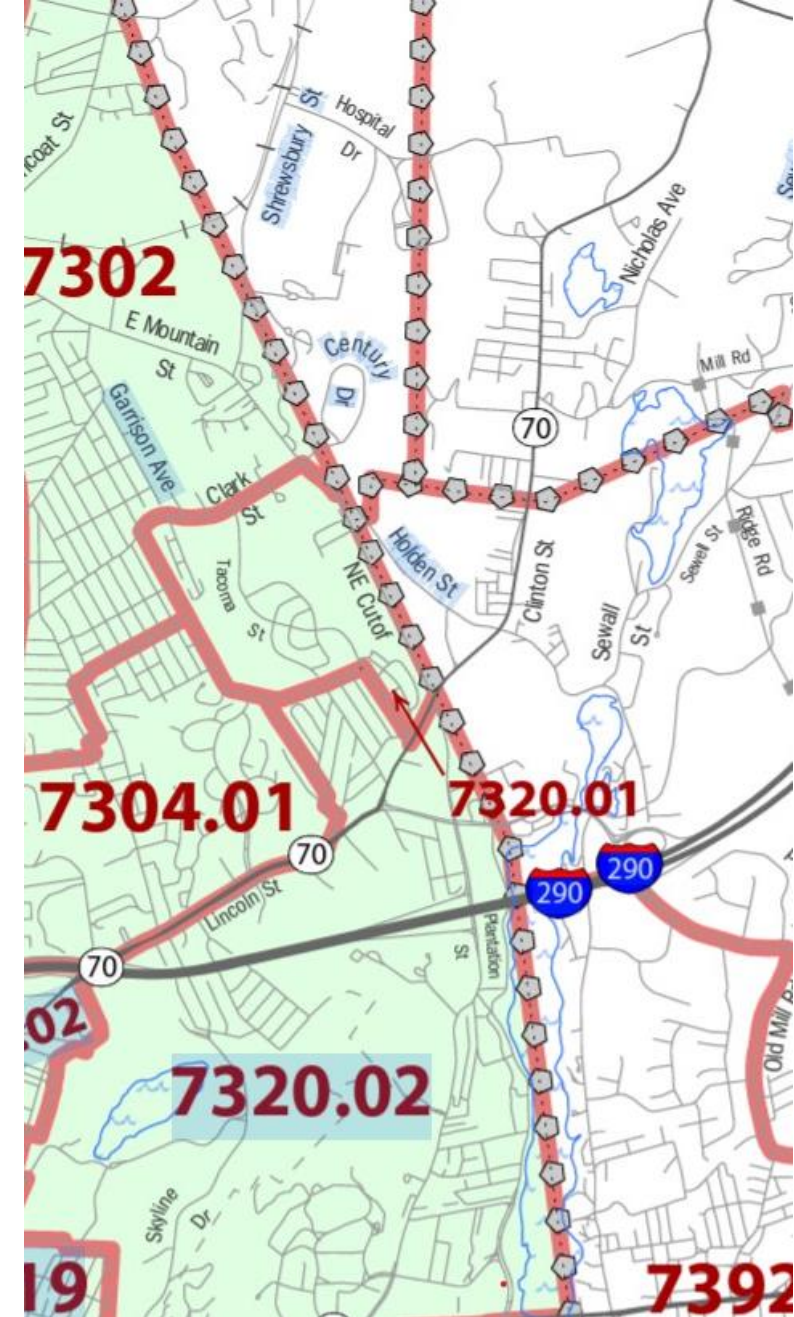
Datasets:

- Number and rates of adult cannabis arrests, convictions, and incarceration;
 - Number and rates of juvenile cannabis arrests, convictions, and detentions;
 - Percent of people living in poverty;
 - Percent of residents who report Black and/or Latino race/ethnicity;
 - Quantitative and qualitative data from 1971 to present; and
 - Any other data that the Commission deems necessary
- Purpose: Gain a better understanding of available data, as well as cost and time, to procure and analyze an additional study.



Census Tract 7320.01

- **Recommendation: Add census tract 7320.01 to the Commission's current ADI list**
 - Dr. Gettman report, *Identifying the Top 25% of Census Tracts According to Unemployment Data in The Largest Cities*, identified the tract as being a top tract but due to a clerical error it was not included on the ADI list
 - Tract had highest level of unemployment in Worcester (18.4%)
 - Tract represents public housing complex, Great Brook Valley



In Closing

- While these recommendations speak to how to utilize the ADI studies, this list is not the only tool the Commission has when striving to create and sustain an equitable industry. We acknowledge that the *War on Drugs* is a war on people, and the harms inflicted on Black, and Latino/Hispanic people occurred no matter where they live(d) in the Commonwealth. We support the Commission's ongoing work providing programming to those most harmed by cannabis prohibition and enforcement.
- In addition, these recommendations may have resource implications, in terms of time, money, and staff bandwidth. If the Commission chooses to act on any recommendations, we support the Executive Director in implementing the Commission's policy objectives.





Questions?

Areas of Disproportionate Impact**Public Comments Tally**

| <u>Name</u> | <u>Entity/Org</u> | |
|----------------------------------------------------------------------------|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 Ryan Dominguez | CultivatED | |
| 2 Shanel Lindsey | Equitable Opportunities NOW! | Part of the Equitable Opportunities NOW! campaign |
| 3 Marcus Williams | | "" |
| 4 Gregnalis Gonzalez | | "" |
| 5 Taylor Shubrick | | "" |
| 6 Mary Jo Marion | Worcester State University | "" |
| 7 Shaleen Title | | "" |
| 8 Julie Todd | Iliff School of Theology | "" |
| 9 Luis Rosado | | "" |
| 10 Sheila Ramirez | | "" |
| 11 Raúl Miller | | "" |
| 12 Payton Shubrick | 6 Brick's LLC | "" |
| 13 Devon Swearingen | | "" |
| 14 Cheis Garrus | | "" |
| 15 Your Green Package | | "" |
| 16 Nairobi Sanchez | | "" |
| 17 Laura Beohner | | "" |
| 18 Jessica Sebastian-Cummings | | "" |
| 19 Armani White | | "" |
| 20 Sara Wilson | Lawyers for Civil Rights | |
| 21 Ari Zorn | | |
| 22 Lara Gonzalez | C.HR Services, LLC | |
| 23 Aaron Tobey, Jr. | | |
| 24 Autume Estrada | Goddess Of Green LLC | |
| 25 Daniel Berger | | |
| 26 MA Black and Latino Caucus | | |
| 27 Talia Landry | | |
| 28 William Watkins | Urban League of Eastern Massachusetts | |
| 29 Segun Idowu | City of Boston | |
| 30 Warren Lynch | Benevolent Botanicals LLC, DBA Continuum | |
| 31 Harry Jean Jacques | | |
| 32 Brandey Rodriguez | | |
| 33 Scholange Smith | | |
| 34 Teddy's Veggie Farm | | |
| 35 Randy Musto | | |
| 36 John Wanless | | |
| 37 Nicole Campbell | The Green Lady Dispensary, Inc. | |
| Other organizations that co-signed the Equitable Opportunities NOW! letter | | Equitable Opportunities NOW!, Mass CultivatED, Minorities 4 Medical Marijuana, Let's Talk Weed, Parabola Center, JustinCredible Cultivation, Your Green Package, Cookies Worcester, New Dia Fenway, EVG Farms, Pure Oasis, Lowkey Dispensary, NAACP Boston, The Big Hope Project |



MASS CultivatED

March 4, 2022

Cannabis Control Commission
Union Station
2 Washington Square
Worcester, MA 01604

Re: Public Comment - Disproportionately Impacted Areas

Dear Honorable Members of the Cannabis Control Commission,

Thank you for the opportunity to submit public comments. On behalf of Mass CultivatED, I am writing to express our concern with the Cannabis Control Commission (“CCC”) plan to update its Disproportionately Impacted Areas (“DIAs”).

Mass CultivatED’s mission is to provide equitable opportunities to individuals and communities targeted by the failed War on Drugs through providing a comprehensive cannabis education program, free legal services, workforce preparedness training, and cannabis externships with livable wages and benefits. All of the fellows in our program are either formerly incarcerated or reside in DIAs as defined by the CCC.

Correctly defining the DIAs is critical to ensuring that Mass CultivatED – and the cannabis industry as a whole – can effectively correct the harms to the Black and Brown communities that have been unduly targeted by the War on Drugs. Mass CultivatED’s cannabis industry partners seek to employ fellows from our program that come directly from DIAs. Unfortunately, Mass CultivatED receives applications from many Black and Brown individuals that reside in communities that have been disproportionately impacted, but are not designated as DIAs. As a result, Mass CultivatED is not able to place a number of individuals who would greatly benefit from a social equity program like ours.

Many of Mass CultivatED’s graduates have also gone on to apply and be accepted into this year’s Social Equity Program (and we only expect this number to grow in the future). It is unacceptable for new candidates in wealthy communities to take advantage of this benefit while those truly affected by the War on Drugs are excluded due to their communities not being listed as DIAs. The CCC should seek to provide these life changing opportunities to **only** those truly affected individuals and communities.

As such, Mass CultivatED believes the CCC must take the time to gain a better understanding of the urban neighborhoods, cities, and towns that may have been excluded as DIAs due to insufficient data collection and racist policing practices.

In order to correct these concerning matters, Mass CultivatED requests that the CCC utilize a racial-equity lens and prioritize the identification and designation of only those communities that have truly been disproportionately harmed by the War on Drugs.

Mass CultivatED’s recommended actions include:



MASS CultivatED

- Conducting a scholarly peer review of this report with researchers who are from, and understand the impact of the War on Drugs in, communities of color
- Focusing on those who have been harmed and embracing that a larger DIA list is inherently inequitable - the focus should be serving communities who are deserving, not serving more communities
- Revisiting the review period of this report to include the 80's and 90's and de-emphasize the opioid epidemic of the 2000's - the opioid epidemic is not synonymous with the War on Drugs
- Ensuring sufficient data collection and analysis to consider missing cities like Lawrence
- Focusing on marijuana arrests, convictions, and incarceration instead of "all drugs" to de-emphasize the opioid epidemic
- Revisiting the overuse of arrest data and include conviction and incarceration data to understand the impact of the War on Drugs as people of color go deeper into the justice system
- Identifying and implementing a more effective mechanism than census tracts to ensure you are truly capturing the impact that the War on Drugs had on entire neighborhoods
- Removing arbitrary "ceilings" (e.g. designating the top 20% of Massachusetts municipalities as DIA) to ensure the list is identifying disproportionately impacted communities, rather than an ineffective ranking list of communities, which overwhelmingly includes communities that have not been harmed by the War on Drugs
- Focusing on neighborhoods where crime perpetrators reside, not just where the crimes occurred - a truer indicator of the people who have been harmed by the War on Drugs

Thank you for your time and consideration. If you have any questions, feel free to contact me at (617)286-6173 or masscultivated@gmail.com.

Sincerely,

Ryan Dominguez
Executive Director
MassCultivatED

3/4/2022

Dear Commissioners,

Regarding the designation for Disproportionately Impacted Areas (DIAs), relying on UMass' report to make changes to the program will not advance the statutorily mandated equity goals. In fact, it would undermine progress made thus far and further marginalize the Black and Brown communities that have been the most harmed by discriminatory overenforcement.

The programming developed by the Commission is admirable, but it cannot have real impact if the opportunities and resources are not available to whom they belong. Most troubling, the UMass report fails to put any focus on communities that have been disproportionately harmed by overenforcement of drug policies. Its suggestions for DIA designations are not based on any viable metric that would serve to properly identify communities harmed by prohibition. Bizarrely, the report suggests the addition of thirty wealthy MA cities and towns that have not faced any meaningful harm from marijuana prohibition. Previously and to this day, insufficient data collection and poor understanding of urban neighborhoods excluded cities like Lawrence and important neighborhoods of color within Boston, Worcester, Springfield, and other large cities. Properly including these communities and identifying where the current designations are overbroad should be first priority. Above all, solid research methods must be utilized. This is especially true when the equity goals of the entire industry hang in the balance.

In order to address the above, we request that the Cannabis Control Commission revisit this report and its findings in an equitable manner that utilizes a racial-equity lens and prioritizes the identification and designation of *only* those who have been disproportionately harmed by the War on Drugs.

Please move forward with the following actions:

- Conducting a scholarly peer review of this report with researchers who are from, and understand the impact of the War on Drugs in, communities of color.
- Focusing on those who have been harmed and embracing that a larger DIA list is inherently inequitable - the focus should be serving communities who are deserving, not serving more communities.
- Revisiting the review period of this report to include the 80's and 90's and de-emphasize the opioid epidemic of the 2000's - the opioid epidemic is not synonymous with the War on Drugs.
- Ensuring sufficient data collection and analysis to consider missing cities like Lawrence.
- Focusing on marijuana arrests, convictions, and incarceration instead of "all drugs" to de-emphasize the opioid epidemic.
- Revisiting the overuse of arrest data and include conviction and incarceration data to understand the impact of the War on Drugs as people of color go deeper into the justice system.
- Identifying and implementing a more effective mechanism than census tracts to ensure you are truly capturing the impact that the War on Drugs had on entire neighborhoods.
- Removing arbitrary "ceilings" (e.g. designating the top 20% of Massachusetts municipalities as DIA) to ensure the list is identifying disproportionately impacted communities, rather than an

ineffective ranking list of communities, which overwhelmingly includes communities that have not been harmed by the War on Drugs.

- Focusing on neighborhoods where crime perpetrators reside, not just where the crimes occurred - a truer indicator of the people who have been harmed by the War on Drugs.
-

We appreciate your time and attention to this. These communities are counting on you!

Sincerely,

Shanel A. Lindsay

Co-founder, Equitable Opportunities NOW

Director of Entrepreneurship, The Parabola Center

CEO Ardent Life, Inc.



March 4, 2022

BY EMAIL (Commission@CCCMass.com)

Cannabis Control Commission
Union Station
2 Washington Square
Worcester, MA 01604

Re: Public Comment on Disproportionately Impacted Areas

Dear Cannabis Control Commission:

Thank you for the opportunity to submit public comment on recent plans to update your Disproportionately Impacted Areas (DIAs). Many Massachusetts communities have been deeply harmed by decades of over-policing, particularly surrounding drug laws. As civil rights advocates, we appreciate that the Cannabis Control Commission (“CCC”) has developed programming and opportunities earmarked for DIAs to remedy the community harm. These programs and your Positive Impact Plans (“PIP”) will deliver millions of dollars to communities and non-profit organizations across Massachusetts. Further, we applaud that these programs and the PIP prioritizes increasing the presence of people of color in the cannabis industry.

In a report issued by the University of Massachusetts, [*Identifying Disproportionately Impacted Areas by Drug Prohibition in Massachusetts*](#) (“The Report”), the disproportionately high numbers of arrests and incarcerations for Black and Latinx individuals was acknowledged, yet it failed to center DIA designations on those communities. Instead, The Report doubled the number of DIAs within the “Tier 2 list”, a list used to identify the top 11-20% of disproportionately impacted areas in the Commonwealth, ultimately diluting priority status of the most affected neighborhoods. The addition of 30 wealthy, majority white, cities and towns that have not faced any meaningful harm from marijuana prohibition, would force DIAs to unfairly compete against well-resourced communities for jobs, non-profit donations, and other forms of community investment.

To correct these concerning matters, we ask that the Cannabis Control Commission revisit The Report and its findings in an equitable manner that utilizes a racial-equity lens and prioritizes the identification and designation of only those communities that have been disproportionately harmed by the War on Drugs. We recommend the following:

61 BATTERYMARCH STREET • 5TH FLOOR • BOSTON, MA 02110
(617) 482-1145 (TELEPHONE) • (617) 482-4392 (FACSIMILE)
WWW.LAWYERSFORCIVILRIGHTS.ORG

- Embrace that a larger DIA list is inherently inequitable - the focus should be serving communities who are more deserving, not serving more communities;
- Revisit the review period of this report to include the 1980's and 1990's and de-emphasize the opioid epidemic of the 2000's, as the opioid epidemic is not synonymous with the War on Drugs;
- Focus on marijuana arrests, convictions, and incarcerations instead of "all drugs" to de-emphasize the opioid epidemic;
- Focus on neighborhoods where formerly arrested, convicted, or incarcerated individuals reside, not just where the crimes occurred. This is a more accurate indicator of the people who have been harmed by the War on Drugs.

Thank you for the opportunity to submit a public comment. We can be reached at the contact information below with any questions or concerns regarding this request.

Sincerely,

Iván Espinoza-Madrigal
Executive Director
617-988-0624
iespinoza@lawyersforcivilrights.org

Sara L. Wilson, Esq.
Legal Fellow
(781) 627-5119
swilson@lawyersforcivilrights.org





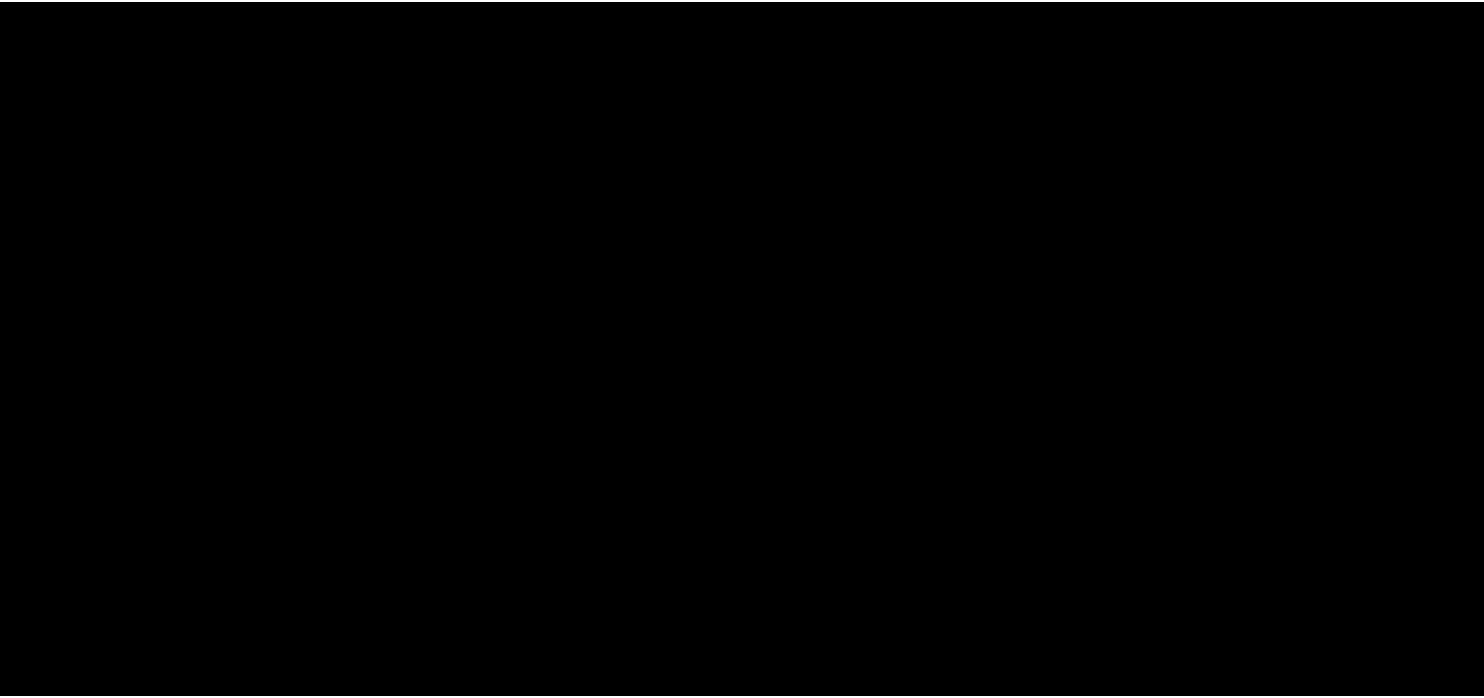
From: Ari Zorn <zornari@gmail.com>

Sent: Friday, March 4, 2022 4:40 PM

To: Cannabis Control Commission <commission@cccmass.com>

Subject: Public comment/ Disproportionately impacted communities

Hi my name is Ari Zorn of Devine Retail Cannabis in S.Egremont Massachusetts. I am the first licensed black cannabis retail store owner in the Berkshires along with my white (minority) wife. Thank you for this opportunity and the work you have done to date. I am also getting involved with the organization called The Block. I have read Marcus Williams response and I fully agree. I want to take the time to express my personal concerns. I am a black man who has suffered all the injustices of being black in America yet I do not qualify under your guidelines. This feels like pouring salt on a wound. I need to have a criminal record or live in an impoverished area? It also bothers me to see black people being used as the face of larger corporations so they can received minority/ social equity status? As hard as you tried the reality of an individual with a criminal record from a impacted community is close to impossible. This makes it appear as if it was never design to work. Simply checking off a box to say "well we tried". I feel like I am repeating what you have most likely heard. Banking/loan issues, business knowledge, expungement, and know how. I want to be clear that this isn't an attack but the more you hear from the community the better. Thank you for your time. Sincerely.



From: Lara Gonzalez- Rodriguez <lgonzalezc.hr@gmail.com>
Sent: Friday, March 4, 2022 4:38 PM
To: Cannabis Control Commission <commission@cccmass.com>
Subject: Public comment

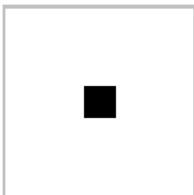
To whom it May concern,

My name is Lara Gonzalez and I live in Springfield massachusetts. I moved to Springfield Massachusetts from Puerto Rico when I was around 4 or 5 years old and have lived in this area for 28 years. I recently attempted to apply for the social equity program as a lifelong resident and afro-latina but was denied due to my zip code, and no one in my family having been incarcerated for a non-violent drug offense. As an afro Latina, even though I have not nor has anyone in my family been arrested for this, the war on drugs has affected me greatly. I spent over 15 years in a deep depression being affected by my mental health and nothing I would use worked. My life was not moving forward and it felt dim and dark as if I would never achieve my goals. The moment cannabis became legal I began using it for my mental health and immediately saw a positive change in my life. Because of the use of cannabis I am now active in the industry, going to school, and literally rebuilding my life. I genuinely do not know where I would be right now if cannabis was still illegal in the state of Massachusetts. Having been denied because of my ZIP code even though Springfield is a predominantly black and Latino area absolutely broke my heart. How is it possible that a town like Amherst which has been red lined and has excluded people who look like me qualifies for this program but Springfield is broken up and not every area qualifies. The way this program is set up is boring so many others like me who would qualify if their zip code was covered. This program could potentially change the trajectory on my career path and help me on the path of doing what it is that I want to do within the Cannabis industry. I believe that a revision of these rules can help benefit not just me but so many other black and brown people of color to make waves in this industry. We all know that this industry is very white male dominated and I feel as if with the social equity program as it stands will help the industry continue on this path. I would love to see a more equitable and diverse industry because only then can this industry reach its complete potential, only then can we see how innovative and creative this industry can be. I'm

not sure if my words will help make a change but I certainly hope that it does. This industry has so much potential and I would love to be one of those people given the opportunity to help it reach that. I sincerely hope that the necessary changes can be made to the social equity program to ensure that it can be truly equitable. When it comes to cannabis time is of the essence because things are changing so rapidly and each round of program that goes by is a wasted opportunity.

Thank you all for your time.

kind regards,



Lara Gonzalez | Operations Consulting

C.HR Services, LLC | 1365 Main St. Springfield | Springfield, MA 01103

Mobile: 413.657.4479 | Email: lgonzalezc.hr@gmail.com

Website: <https://www.chrservice.org>

Friday March 4 2022

Dear Cannabis Control Commissioners

We write this letter to you today as Black and Brown led racial justice organizations and Black-owned businesses that have been advocating for racial justice in the recreational marijuana industry since its legalization. Many of us pushed for this newly regulated industry to create measures to remedy the harm done by the war on drugs and we were proud of the creation of programming and opportunities and the use of Disproportionately Impacted Areas (DIAs), however we always knew that these measures didn't go far enough. Thank you for the opportunity to submit public comment on your plans to update your Disproportionately Impacted Areas (DIAs). Our communities have been deeply harmed by the War on Drugs through decades of policing and over enforcement of drug laws. These programs and your PIP plans will deliver millions of dollars to communities and non-profits across Massachusetts and aim to prioritize some people of color entering the cannabis industry. However, enough hasn't been done and UMass' recent report, Identifying Disproportionately Impacted Areas by Drug Prohibition in Massachusetts would reverse the limited progress made and further disparities for those of us who have been most harmed – black and brown people.

The report fails to focus directly on the communities that have truly been ***disproportionately*** harmed by overenforcement of drug policies. While the report states that “prior research demonstrates that enforcement of drug prohibition has resulted in disproportionately high numbers of arrests and incarceration for Black and Latino individuals,” it does not center the DIA designations on those communities of color. Instead, the report doubles the number of DIAs with a “Tier 2 list.” The addition of 30 wealthy cities and towns that have not faced any meaningful harm from marijuana prohibition, would force our community to unfairly compete against well-resourced communities for jobs, non-profit donations, and other forms of community investment. Insufficient data collection and poor understanding of urban neighborhoods has ***entirely excluded*** cities like Lawrence and important neighborhoods of color within Boston, Worcester, Springfield, and other large cities. These cities and neighborhoods have already been devastated by the War on Drugs and UMass' report will cause further harm because of the ineffective use of census tracts and missing data. Lastly, the intentional decision to use certain research methodologies and datasets paint a distorted picture of who has been harmed and should benefit from the millions of dollars in community investment from the legal cannabis industry.

In order to correct these concerning matters, we ask that the Cannabis Control Commission revisit this report and its findings in an equitable manner that utilizes a racial-equity lens and prioritizes the identification and designation of ***only*** those who have been disproportionately harmed by the War on Drugs.

We recommend doing so by: Conducting a scholarly peer review of this report with researchers who are from, and understand the impact of the War on Drugs in, communities of color

- Focusing on those who have been harmed and embracing that a larger DIA list is inherently inequitable – the focus should be serving communities who are deserving, not serving more communities
- Revisiting the review period of this report to include the 80's and 90's and de-emphasize the opioid epidemic of the 2000's – the opioid epidemic is not synonymous with the War on Drugs
- Ensuring sufficient data collection and analysis to consider missing cities like Lawrence
- Focusing on marijuana arrests, convictions, and incarceration instead of “all drugs” to de-emphasize the opioid epidemic
- Revisiting the overuse of arrest data and include conviction and incarceration data to understand the impact of the War on Drugs as people of color go deeper into the justice system
- Identifying and implementing a more effective mechanism than census tracts to ensure you are truly capturing the impact that the War on Drugs had on entire neighborhoods
- Removing arbitrary “ceilings” (e.g. designating the top 20% of Massachusetts municipalities as DIA) to ensure the list is identifying disproportionately impacted communities, rather than an ineffective ranking list of communities, which overwhelmingly includes communities that have not been harmed by the War on Drugs
- Focusing on neighborhoods where crime perpetrators reside, not just where the crimes occurred – a truer indicator of the people who have been harmed by the War on Drugs

Thank you for the opportunity to submit a public comment as the undersigned racial justice advocacy groups and Black owned Businesses:

Equitable Opportunities NOW!

NAACP Boston

The Big Hope Project

Mass CultivatED

Minorities 4 Medical Marijuana

Let's Talk Weed

Parabola Center

JustinCredible Cultivation

Your Green Package

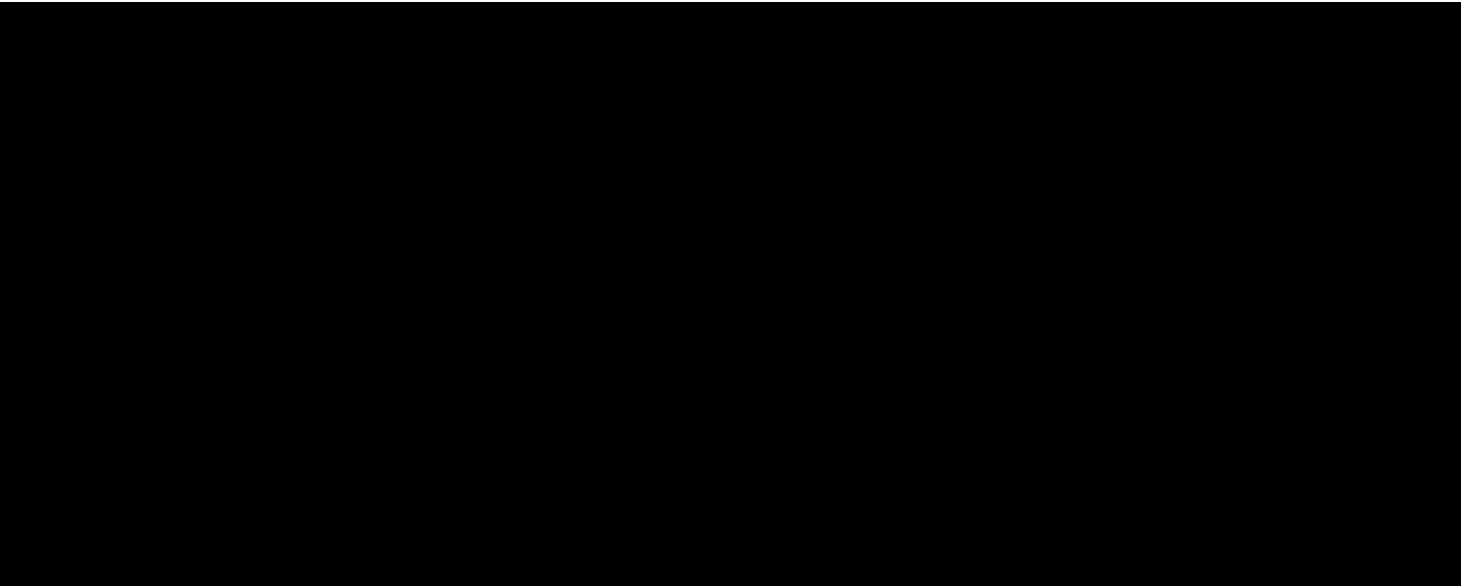
Cookies Worcester

New Dia Fenway

EVG Farms

Pure Oasis

Lowkey Dispensary



From: Aaron Tobey <Aaron.Tobey@mwtribe-nsn.gov>
Sent: Friday, March 4, 2022 3:40 PM
To: Cannabis Control Commission <commission@cccmass.com>
Cc: Brian Weeden <Brian.Weeden@mwtribe-nsn.gov>
Subject: Public Comment

Dear Commission Chairman Hoffman and Members,

Through this email I wish to reinforce the request made in my July 12, 2018 email to you with regard to including Indigenous People, Native Americans in the eligibility as economic empowerment applicants, particularly in Southeastern Massachusetts, Cape Cod and Island communities.

I write again because I learned this afternoon that the public comment period for a set of regulatory updates relevant to this request will close at 5 PM today, March 4, 2022. Please accept this email as testimony reiterating my request as the deadline approaches.

Since both the statutory and regulatory framework related to Cannabis in the Commonwealth include special emphasis for the inclusion of underrepresented groups, racial equity, and assisting disproportionately impacted individuals and communities, the Indigenous Peoples and Native American people, and the communities in which they live, deserve full consideration as so many fall within these categories.

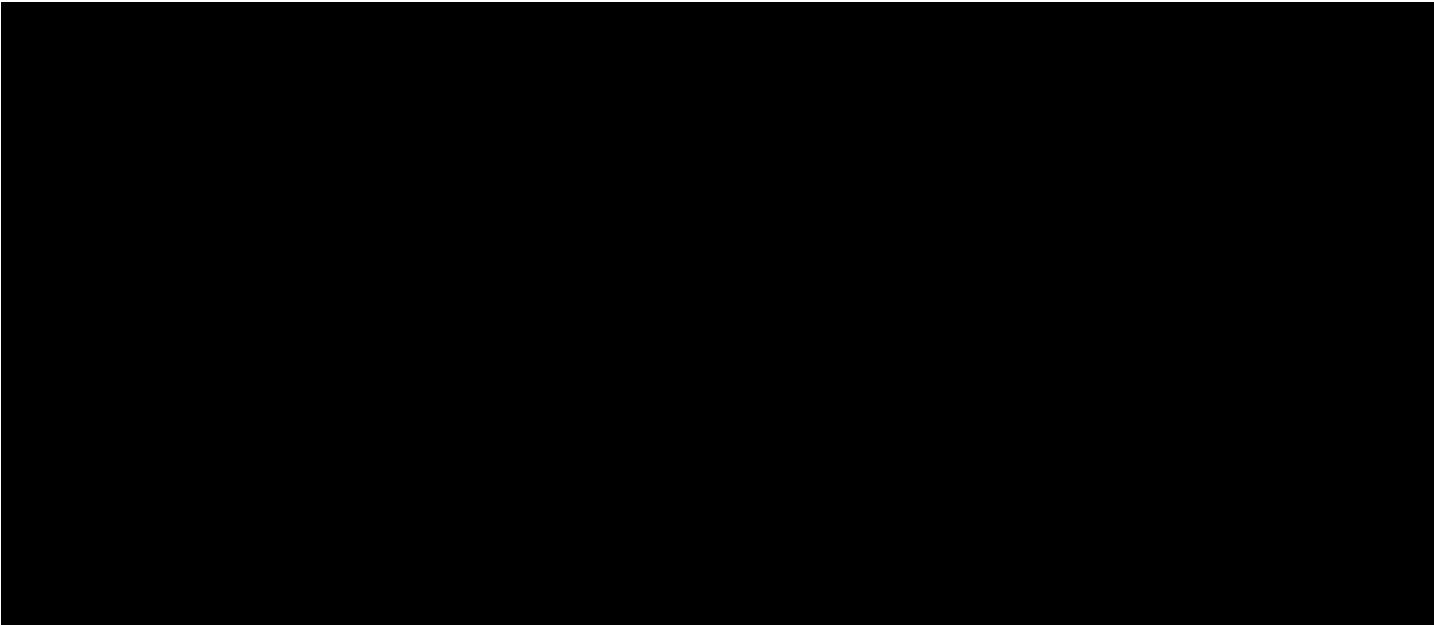
Therefore, I respectfully request that we be specifically enumerated in any and all related policies and programs, and most especially the revised regulations being

contemplated at this time.

I and others would be happy to meet with Commissioners and staff, at its convenience, to discuss this in greater detail.

Thank you for considering these comments. We look forward to the opportunity to pursue this subject with you in the coming weeks.

Sincerely,
Aaron Tobey, Jr.



From: Goddess Of Green LLC. <goddessofgreenllc@gmail.com>

Sent: Friday, March 4, 2022 3:41 PM

To: Cannabis Control Commission <commission@cccmass.com>

Subject: "Public Comment: Disproportionately Impacted Areas"

What is a system that was not made for its people?

Well the war on drugs is still controlling society and social equity. Cash value on skills of people that were harmed by the system for generations is not helping them it is harming them. You have many who have had cannabis passed down to them fighting for land, money and a space that their families have generations of history in. We have lost our whole identities to these atrocities. So forgive me for not being thankful for the Social Equity program anymore. I have spent the last 2 yrs. With wealthy individuals who look down on the originators of this industry because they are not "legal". This is another slap in the face as an American-Mexican daughter of immigrant farmers. I have a skill that is bought once again like a slave.

I moved to Massachusetts as a shotgun domestic violence survivor to overcome, I would have no idea how much it would show me that all around the world the system is the same towards humans that they do not understand.

I have spent over 16 years of giving my life back to medicine, holistic health in the hopes of one day my traditional medicines of cannabis would be accepted by others. It has now become another commodity. It is being treated like every other thing on this earth and we are harming what has been giving to us to take care of one another.

I can tell you that I want my cannabis license so I can change things, but that is not enough. I will tell you that I was NOT raised to take someone's (investor's) money to do what I know I can fund myself for. If I am given the chance.

How? You ask. Can we do this, well we have been doing this for generations with no funding. Why? Because just like the common investors that I have met with they do not believe in this "illegal" industry and feel that the "legal industry" may go away in a few years. I tell them sir in my short 35 years on this planet my family has had their hands in the dirt with this plant and many others, and

they will even long after I am gone.

So I ask you this in 30 years can we the people count on you to really cause a positive change from the ground for social equity brown and black people?

Or will we continue the narrative of the system helping the system while the people on the ground in the dirt are continued to be displaced and pushed into a system that has been built to cause them shame guilt and no sense of humanness.

I now live in New Bedford, Massachusetts where I'm very proud to call home and my business home. New Bedford is listed as #2 in Cannabis arrests in the state we are a multiethnic and multicultural community with a high proportion of foreign residents. Almost 10,000 people in New Bedford consider themselves hispanic or latino. New Bedford is home to Fredrick Douglas and let me tell you that coming from Colorado it is very refreshing to walk through City Hall and see the different color faces on the wall. As a female who grew up around diversity and through adversity I love what Massachusetts has birthed in me.

I now live to help others and that's exactly what I plan on showing others through Goddess Of Green, LLC.

I ask that you all please consider us the ones who are in the dirt everyday not afraid to get dirty, who genuinely want to help their communities globally, but locally first.

Thank you for your time.

- Autume Estrada

508-933-9260

I can be available to further conversation.



From: Cannabis Business <masscannabisbusiness@gmail.com>

Sent: Friday, March 4, 2022 1:11 PM

To: Cannabis Control Commission <commission@cccmass.com>

Subject: Public Comment: Disproportionately Impacted Areas

Hello,

I am reaching out today to submit my Public Comment on the Cannabis Control Commission's new study - Identifying Disproportionately Impacted Areas by Drug Prohibition in Massachusetts.

First - there is not one mention of the word indigenous, nor any substantive look into the effects the War on Drugs had on any of the Federal or State Recognized Tribes in Massachusetts. As someone with First Nation Mi'kmaq ancestry, it seems like a gross oversight to not at least acknowledge one of the original "Disproportionately Impacted" communities in this country. Not even a mention in the FAQ.

Second - the seasonal housing exclusion. As someone who has lived on Nantucket year-round, one could argue the same apparatus used to ensnare tourists during peak seasons is just as detrimental, if not more so, to the folks who call that community home full time. I would urge the CCC to consider allowing communities with high seasonal housing levels still on the list of DIA's. Suppose you add more robust residency/arrest requirements. In that case, the individual can prove the arrest occurred while they lived/worked in the community, or the arrest happened in the offseason, coupled with proof of income, that would make this list more comprehensive and genuinely Equitable.

Third - the City of Lawrence. The omission of any data from any community is a shame, especially from one with a population close to 100,000 people and the demographic makeup detailed in the report and FAQ. I again urge the Commission to make all effort possible to include the City of Lawrence and flesh out any data gaps before updating any policies surrounding DIA's and the State's Equity Programs.

I appreciate the diligence the Commission is taking to understand the breadth and scope of the War on Drugs' damage on communities in the Commonwealth. Massachusetts has been a standard-bearer for Equity in the emerging legal cannabis market. If we keep that in mind and make sure anyone touched by the brutality of the War on Drugs has a fighting chance to get involved in this industry, we will continue to do so. I hope this study pushes us further towards a truly Equitable cannabis industry.

Thank you,

signature.jpg



Daniel R. Berger
137 State St #2
North Adams MA 01247
masscannabisbusiness@gmail.com



The Commonwealth of Massachusetts
STATE HOUSE, BOSTON 02133

March 4, 2022

Dear Cannabis Control Commission,

Thank you for the opportunity to [submit public comment](#) on your plans to update your [Disproportionately Impacted Areas](#) (DIAs). Our communities have been deeply harmed by the War on Drugs through decades of policing and over enforcement of drug laws. We appreciate that the state's Cannabis Control Commission has developed [programming and opportunities](#) earmarked for DIAs, to remedy the harm that has been done to our communities. These programs and your [PIP plans](#) will deliver millions of dollars to communities and non-profits across Massachusetts and aim to prioritize some people of color entering the cannabis industry. However, enough has not been done, and UMass' recent report, [Identifying Disproportionately Impacted Areas by Drug Prohibition in Massachusetts](#) would reverse the limited progress made and further disparities for those of us who have been most harmed - Black and Brown people.

The report fails to focus directly on the communities that have truly been *disproportionately* harmed by overenforcement of drug policies. While the report states that "prior research demonstrates that enforcement of drug prohibition has resulted in disproportionately high numbers of arrests and incarceration for Black and Latino individuals," it does not center the DIA designations on those communities of color. Instead, the report doubles the number of DIAs with a "Tier 2 list". The addition of 30 wealthy cities and towns that have not faced any meaningful harm from marijuana prohibition, would force our communities to unfairly compete against well-resourced communities for jobs, non-profit donations, and other forms of community investment. Insufficient data collection and poor understanding of urban neighborhoods has *entirely excluded* cities like Lawrence and important neighborhoods of color within Boston, Worcester, Springfield, and other large cities. These cities and neighborhoods have already been devastated by the War on Drugs and UMass' report will cause further harm because of the ineffective use of census tracts and missing data. Lastly, the intentional decision to use certain research methodologies and datasets paint a distorted picture of who has been harmed and should benefit from the millions of dollars in community investment from the legal cannabis industry.

In order to correct these concerning matters, we ask that the Cannabis Control Commission revisit this report and its findings in an equitable manner that utilizes a racial-equity lens and prioritizes the identification and designation of *only* those who have been disproportionately harmed by the War on Drugs.


We recommend doing so by:

- Conducting a scholarly peer review of this report with researchers who are from, and understand the impact of the War on Drugs in, communities of color
- Focusing on those who have been harmed and embracing that a larger DIA list is inherently inequitable - the focus should be serving communities who are deserving, not serving more communities
- Revisiting the review period of this report to include the 80's and 90's and de-emphasize the opioid epidemic of the 2000's - the opioid epidemic is not synonymous with the War on Drugs
- Ensuring sufficient data collection and analysis to consider missing cities like Lawrence
- Focusing on marijuana arrests, convictions, and incarceration instead of "all drugs" to de-emphasize the opioid epidemic
- Revisiting the overuse of arrest data and include conviction and incarceration data to understand the impact of the War on Drugs as people of color go deeper into the justice system

- Identifying and implementing a more effective mechanism than census tracts to ensure you are truly capturing the impact that the War on Drugs had on entire neighborhoods
- Removing arbitrary “ceilings” (e.g. designating the top 20% of Massachusetts municipalities as DIA) to ensure the list is identifying disproportionately impacted communities, rather than an ineffective ranking list of communities, which overwhelmingly includes communities that have not been harmed by the War on Drugs
- Focusing on neighborhoods where crime perpetrators reside, not just where the crimes occurred - a truer indicator of the people who have been harmed by the War on Drugs

We greatly appreciate the opportunity to submit a public comment.

Sincerely,



Chynah Tyler, Chair
M.A. Black and Latino Caucus
State Representative
7th Suffolk

Frank A. Moran
State Representative
17th Essex District

Russell E. Holmes
State Representative
6th Suffolk District

Andres X. Vargas
State Representative
3rd Essex District

Brandy Fluker-Oakley
State Representative
12th Suffolk District

Danillo A. Sena
State Representative
37th Middlesex District

Liz Miranda
State Representative
5th Suffolk District

Orlando Ramos
State Representative
9th Hampden District

Nika C. Elguardo
State Representative
15th Suffolk District

Marcos A. Devers
State Representative
16th Essex District

Jon Santiago
State Representative
9th Suffolk District

Bud L. Williams
State Representative
11th Hampden District

Carlos González
State Representative
10th Hampden District

Kip A. Diggs
State Representative
2nd Barnstable

Sonia Chang-Díaz
State Senator
2nd Suffolk District

Adam Gómez
State Senator
Hampden District

Lydia Edwards
State Senator
1st Suffolk and Middlesex

Závon Billups
M.A. Black and Latino Caucus
Executive Director



From: Talia Landry <talialandry23@gmail.com>

Sent: Friday, March 4, 2022 12:54 PM

To: Cannabis Control Commission <commission@cccmass.com>

Subject: Public Comment: Disproportionately Impacted Areas

Native American's are greatly impacted by the war on drugs and should be included in the social equity program. According to the CDC, "Nationally, American Indians and Alaska Natives (AI/AN) have experienced the largest increases in drug and opioid-involved overdose mortality rates compared with other racial/ethnic groups. Misclassification of AI/AN race is known to underestimate AI/AN mortality rates."

I am a Mashpee Wampanoag Tribal Member, personally I have lost 6 immediate cousins to drug overdoses in the past 4 years. The tribe as a whole has lost over 20 tribal members to drug overdoses and suicide since 2016. Two of my first cousins are currently battling with addiction and drug related charges. We are a tribe of only 2,800 and not all of us live in MA.

This past month my older brother has been released from Federal Prison, after 9 years of being incarcerated. He initially was charged by the state regarding drug charges. During his 4-year sentence incarcerated, the Federal government began their case on him. He was then convicted by a federal judge in connection with running a large scale marijuana operation and laundering proceeds. He is out on supervised release for the next three years. All of his charges and time served since 2017 has been regarding Marijuana Charges. His is one example of many other tribal members that have received even more time. Another being my cousins husband, his brother, and cousin. The cousin is still serving a 25-year sentence for drug charges.

Our tribal community continues to be impacted by the war on drugs. Whether it be drug use or sale, our youth is susceptible to the trend. We are confined on cape cod and a lot of families are living outside their means in order to stay on our ancestor's land. Many kids do not see the world over "the Bridge" until adulthood. With living prices rising, parents are getting more pressure financially that trickles down to our youth, Especially our tribal boys. Many families are seeing 1 parent households, this puts a lot of strain on the parent and child. A young boy never wants to ask their hardworking mother for extra money to do anything, therefore they take advantage of their opportunities.

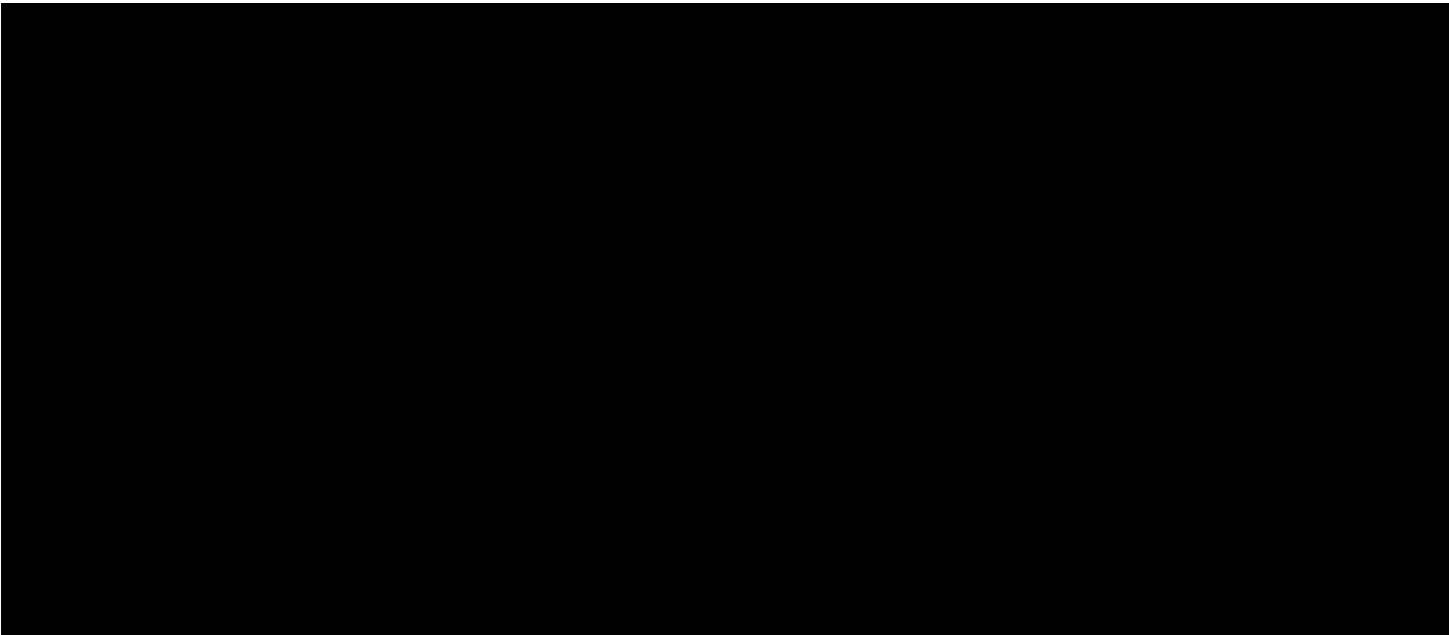
In my family's situation, my father has struggled with drug and alcohol abuse his entire life. This left my brother raising myself and younger brother. Not only would he protect us from abusive behaviors, he would be our responsible party when our mother worked late. When he grew throughout HS he felt the responsibility to help my mother out as a co-parent would. This would mean taking myself school shopping, providing lunch money, rides, and more. The pressure of his financial status trickled from his family into his community. He held onto responsibilities to feed his community. This involved him growing his drug business to a bigger scale to provide for more mouths to feed and to put them in situations where they could provide for their families as well.

Our ancestors survived small pox, genocide, and assimilation by staying on the land where we were created and together as a community. American society has constantly been polluting our community, our land, air, blood, and minds. It is a constant struggle to be indigenous in American, drugs are one of our many poisons.

Marijuana has been used as medicine within our history. It was introduced by the Indigenous tribes of central and south America that became part of tribal practice. We have many skilled business people and plant nurturers among the community that would benefit the cannabis industry here in Massachusetts, if they were given the same opportunities of OTHER disadvantaged communities in the commonwealth. To completely miss us in the social equity program is an actual disgrace for the state. Not only did we greet the pilgrims on their arrival, we guided those now Europeans Americans to health and safety. There would not be a commonwealth or American without the assistance of Native Americans. Although we are only about 1% of America, we are still here and we are getting affected the most by colonization. Colonization began with religion but heavily relied on alcohol and drugs to wipe out our existence. Quite frankly leaving native Americans out of this program is absurd.

Talia Landry

Talialandry23@gmail.com



From: William Watkins <WWatkins@ulem.org>

Sent: Friday, March 4, 2022 11:27 AM

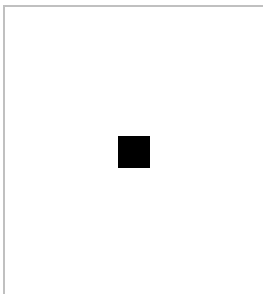
To: Cannabis Control Commission <commission@cccmass.com>

Subject: Public Comment

According to the report, the exclusion of towns that have a high concentration of communities that the “War has disproportionately impacted on Drugs” (e.g., Black, Latino)) may harm our equity efforts by creating eligibility gaps for populations that are critical to our mission.

There are other things to consider when looking at those gaps:

- It does not consider a black family affected by their family member engaging in that activity outside the census tract.
- It does not consider the siblings that were indirectly affected by the family member being incarcerated, and the family saving went to support or fight the courts. It kept a family from creating general wealth to buy a home or send a sibling to college.
- It does not consider public housing as a cesspool for this activity trapping generations of families into a life of poverty



William Watkins

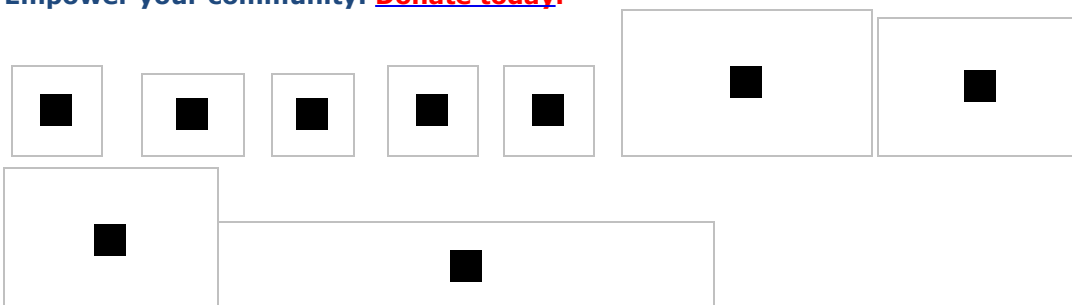
Director for Workforce Development

Urban League of Eastern Massachusetts

88 Warren Street | Roxbury, MA 02119

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From: Shaleen Title <shaleen@shaleentitle.com>
Sent: Friday, March 4, 2022 10:44 AM
To: Cannabis Control Commission <commission@cccmass.com>
Cc: Nurys Z Camargo <Nurys.Camargo@cccmass.com>
Subject: Public Comment: Disproportionately Impacted Areas

Dear Commission,

In the spirit of continuously improving the process of identifying disproportionately harmed communities and making updates based on the best data and information available, I am writing to support the actions below. Thank you for the opportunity to submit a public comment.

Sincerely,
Shaleen Title

*Conducting a scholarly peer review of this report with a diverse group of researchers who are from and understand the impact of the War on Drugs on communities of color

*Focusing on those who have been harmed and embracing that a larger DIA list is not necessary equitable - the focus should be on an accurate list, not serving more communities

*Revisiting the review period of this report to include the 1980s and 1990s

*Ensuring sufficient data collection and analysis to consider missing cities like Lawrence

*Revisiting the overuse of arrest data and include conviction and incarceration data to understand the impact of the War on Drugs as people of color go deeper into the justice system

*Seek to identify a more effective mechanism than census tracts to ensure you are truly

capturing the impact that the War on Drugs had on entire neighborhoods

*Removing arbitrary “ceilings” (e.g. designating the top 20% of Massachusetts municipalities as DIA) to ensure the list is identifying disproportionately impacted communities, rather than an ineffective ranking list of communities, which overwhelmingly includes communities that have not been harmed by the War on Drugs

*Focusing on neighborhoods where the people reside, not just where the offenses occurred - a truer indicator of the people who have been harmed by the War on Drugs



City of Boston
Economic Opportunity
and Inclusion

February 24, 2022

Chairman Steven J. Hoffman

Commissioners:

Nurys Camargo

Ava Callender Concepcion

Kimberly Roy

Bruce Stebbins

Union Station

2 Washington Sq.

Worcester, MA 01604

RE: Expansion of ADI in Boston:

Dear Commissioners,

Thank you for opening up a comment period for feedback and recommendations on how the CCC measures Areas of Disproportionate Impact (ADI). As you know, at the Mayor's Office of Economic Opportunity & Inclusion (OEI) at the City of Boston, we are committed to ensuring equitable regulation of cannabis establishments by providing funding and technical assistance to certified equity applicants and licensees from backgrounds and neighborhoods most affected by the War on Drugs.

Similar to the State's Social Equity Program, OEI offers the Boston Equity Program, which offers a local equity applicant certification if at least 51 percent of the ownership group meets at least three of the following criteria:

1. A person who has resided in an area of disproportionate impact (ADI), as defined by the Boston Cannabis Board, for at least 5 of the last 10 years
2. A person who has a past arrest or conviction for the possession, sale, manufacturing, or cultivation of Marijuana between 1971 and 2016, who has been a resident of Boston for the past five years, **OR**
is the child of a person with a past arrest or conviction for the possession, sale, manufacturing, or cultivation of Marijuana between 1971 and 2016, who has been a resident of Boston for the past 5 years



- **The challenge:**

- The CCC currently only recognizes the majority of neighborhoods in Tiers 1-2 as ADI in Boston, excluding access for benefits and participation for many Boston residents living outside of Tiers 1-2 that may have also been affected by the war on drugs.
- OEI recognizes the need for expanded access for Boston residents to qualify for the benefits offered by the Boston Equity Program & CCC's Social Equity Program. Currently, there are 39 certified Boston Equity Applicants, and each of them have a 51% beneficial interest holder that fits 3 out of the 7 criteria – one of which is living in an Area of Disproportionate Impact for 5 out of the last 10 years. While we do not have data reflecting how many folks have tried to qualify for equity certification and did not qualify (or apply) based on where they lived, we know it's come up several times that an applicant has lived in a neighborhood their whole lives and are surprised that their address does not qualify as an ADI based on their personal experience with the "war on drugs" in their neighborhoods of Hyde Park, Roslindale, Mattapan, all of which are not highly represented in Tiers 1 and 2.
- OEI recognizes the need for expanded access for eligible areas to designate Positive Impact Plans.

- **Our recommendation:**

- In addition to Tier 1 and Tier 2, we recommend that the CCC expand the eligibility to include Tier 3 and Tier 4 in Boston. We also welcome and support your policy consideration on including additional eligibility as defined as "***membership in an additional priority group (e.g., personal or family history of drug arrest or incarceration; Black race and/or Latino ethnicity)***".
- The addition of Tiers 3 and 4 will more accurately capture the scope of Disproportionately Impacted Areas, particularly for Boston's Black and/or Latino residents living in neighborhoods that may otherwise not be included, such as the majority of Mattapan, Dorchester Center, Hyde Park, Roslindale, Jamaica Plain, and East Boston.



City of Boston
Economic Opportunity
and Inclusion

We believe that eligibility to access equity programs need to be centered around people who have been disproportionately impacted by the war on drugs rather than on their current census tracts. The more inclusive we are, the more accessible our resources will be to equity applicants trying to get into the legal cannabis industry in Boston.

My office is available if you have any questions about our feedback and comments. I can be reached at segun.idowu@boston.gov or 617-635-5729.

Thank you,

Segun Idowu
Chief of Economic Opportunity & Inclusion
City of Boston

March 2, 2022

To whom it may concern:

As scholars and practitioners involved with a range of urban challenges in communities of color in Massachusetts, we are deeply concerned by the Cannabis Control Commission's study titled "*Identifying Disproportionately Impacted Areas by Drug Prohibition in Massachusetts*" (Whitehill, Melnik et al. 2021). It is our contention that the study is flawed and presents several inconsistencies. The overall approach is not fully reflective of a racial/ethnic equity lens. Moreover, the framework used by the authors does not allow to properly capture the adverse effects of the War on Drugs. Below, we point out the major methodological shortcomings and inconsistencies of the study. We also make suggestions for further research.

Because the authors rely on *all* drug arrests, it is clear that the study is more an assessment of the opioid crisis in Massachusetts over the past twenty years, rather than a study of the impact of the enforcement of *cannabis-related* legislation on individuals and communities across the commonwealth since the heyday of the War on Drugs. This comes in contradiction with the mandate assigned to the Cannabis Control Commission. Indeed, the Commission is required to develop "procedures and policies to promote and encourage full participation in the regulated cannabis industry by people from communities that have previously been disproportionately harmed by cannabis prohibition and enforcement and to positively impact those communities" (G. L. c. 94G, § 4 (a ½) (iv)).

According to the Commission's Guidance on Equity program, "the Social Equity Program (SEP) ... focuses on those most impacted by the War on Drugs, marijuana prohibition, disproportionate arrests and incarceration..." Surprisingly, the authors use arrests data but do not take into account *incarceration* (imprisonment), and more importantly, *conviction* data, thus giving a partial and incomplete picture of the impact of the War on Drugs on historically and disproportionately impacted communities. Simply put, the study reduces the War on Drugs to a policing issue, overlooking the judicial and legal consequences on these communities. Incorporating data capturing incarceration and conviction would give a more accurate account of the sentencing disparities between races.

Equally problematic is the time period used to quantify the impact of the War on Drugs on these communities. The study rightly refers to Richard Nixon's War on Drugs initiated in 1971 and Ronald Reagan's Anti-Drug Abuse Acts of 1986 (p. 9). This is consistent with the Request for Quotes (RFQ #20_PRF61_0207) which correctly indicates that "for the purpose of this study, the 'war on drugs' spanned from June 1970 to December 2017" (p. 1). Incoherently, the authors rely on data from 2000 to 2017. In other words, the study excludes at least fifteen years of enforcement, a time period that includes the peak of the War on Drugs in the mid-1980s. Studying the impact of the War on Drugs without considering the 1980s makes no sense at all.

Furthermore, the lack of clarity concerning the unit of analysis is striking: is it communities or is it individuals? This confusion runs throughout the study. It should be mentioned that the adverse effects of the War on Drugs did not simply fall on individuals, but entire communities.

Therefore, variables such as family-make-up, employment/underemployment/unemployment gaps by race/ethnicity, residential segregation, criminal justice practices, and youth development should be considered in order to effectively address the significant harm of the War on Drugs on people of color and their communities.

Other deficiencies make the study even more problematic:

- The fact that Lawrence is not identified as an impacted community is a red flag. Lawrence is the city with the highest percentage of Latinx residents in Massachusetts. Note that, while both Boston and Lawrence lacked arrest data, the authors proactively reached out to Boston Police to request the data. There is no explanation as to why this was not done in Lawrence.
- The false assertion that poverty is linked to drug use; this is an unfounded claim.
- The threshold of 70% to be identified as a tier one community is not explained or justified; it seems arbitrary without further explanation.

Drawing policy conclusions from such a defective and incomplete study is harmful, misguided, and unfair for the communities harmed by the War on Drugs. A revamped study using a completely different research design should be conducted.

Sincerely,


Ramón Borges-Méndez, PhD
Associate Professor of Community Development & Planning
International Development, Community and Environment Dept. (IDCE)
Coordinator, Urban Studies Concentration (Undergraduate Program)
Clark University

James Jennings, PhD
Professor Emeritus of Urban and Environmental Policy & Planning
Tufts University

Mary Jo Marion
Assistant VP for Urban Affairs and the Latino Education Institute
Worcester State University

Guy Numa, PhD

Lorna Rivera, Ph.D.
Director, Mauricio Gastón Institute for Latino Community Development & Public Policy
Associate Professor of Women's & Gender Studies & Latino Studies
University of Massachusetts-Boston



From: Warren Lynch <warren@continuum420.com>
Sent: Sunday, February 27, 2022 8:23 PM
To: Cannabis Control Commission <commission@cccmass.com>
Subject: Public Comment: Disproportionately Impacted Areas

Dear Cannabis Control Commission,

Thank you for considering the scientific study that shows that my home community of Malden, and the neighboring communities of Everett, Lynn, and Salem, along with 8 other new cities and towns, are Tier 1 disproportionately impacted areas according to the study, and considering adding them to the Areas of Disproportionate Impact!

I understand that the Commission has been working hard on this for a long time, and there are still concerns about one or two cities which were not listed in the study. But while that data is still being processed for those one or two communities, **please** consider putting the definite Tier 1 cities and towns through immediately. Every month that goes by without this happening is another month where folks in 12 Tier 1 cities and towns cannot be Social Equity Participants, and larger companies move in to take the limited number of licenses in those cities and towns.

I'm a certified Social Equity Participant due to a past nonviolent drug arrest. But I'm also a resident of Malden for 12 years, and my partner has been here 10 years. Adding Malden to the list of Disproportionately Impacted cities and towns would mean that other people like me could be Social Equity participants without having to make their arrest record public as I

did. And it would mean other Maldonians such as my partner could also have that chance to receive support as Social Equity Participants.

As of the 2020 census, Malden is now 60% nonwhite and over 40% immigrant. And our median income is well below the state median income. Malden is a Gateway City, has an Opportunity Zone, and was listed as Tier 1 in the study.

Please consider immediately advancing at least the 12 Tier 1 cities in the study to Disproportionately Impacted status, as it would mean the world to residents in those communities, and in **our** community!

Thank you very much,

Warren Lynch

Co-founder, Benevolent Botanicals LLC, DBA Continuum

Social Equity Participant

Malden resident



From: Harry Jean Jacques <bighopeproject@gmail.com>

Sent: Wednesday, February 23, 2022 6:28 AM

To: Bruce Stebbins <Bruce.Stebbins@cccmass.com>; Cannabis Control Commission
<commission@cccmass.com>

Cc: Kate Flanagan <Kate.Flanagan@cccmass.com>; Kevin Sibley <Kevin.Sibley@cccmass.com>

Subject: Re: Big Hope Project Call with CCC

Thank you for the information Bruce. The CCC should consider adding Tiers 2, 3, and 4 ADI and membership in an additional priority group (Black race and/or Latino ethnicity). The addition of these tiers will more accurately capture the scope of Disproportionately Impacted Areas, particularly for our Black and/or Latino residents living in neighborhoods that may otherwise not be included, such as the majority of Mattapan, Dorchester Center, Hyde Park, Roslindale, Jamaica Plain, and East Boston.

Sincerely,
Harry

On Tue, Feb 15, 2022 at 11:05 AM Bruce Stebbins <Bruce.Stebbins@cccmass.com> wrote:
Harry – Thanks for reaching out. Hope all is well with you.

We are inviting public comment on this topic and there is still plenty of time to provide feedback directly to the commission. The deadline is March 4th. Here is a link to the announcement. Please feel free to circle back with any questions.

[Public Comment Now Open Regarding Changes to the Commission's Disproportionately Impacted Areas - Cannabis Control Commission Massachusetts \(masscannabiscontrol.com\)](https://masscannabiscontrol.com/public-comment-now-open-regarding-changes-to-the-commission-s-disproportionately-impacted-areas)

From: Harry Jean Jacques <bighopeproject@gmail.com>
Sent: Tuesday, February 15, 2022 10:32 AM
To: Bruce Stebbins <Bruce.Stebbins@cccmass.com>
Subject: Re: Big Hope Project Call with CCC

Hello Bruce, hope you are well. I read that the CCC is conducting stakeholder meetings about broadening the area of disproportionately impacted areas. How can I be a part of these discussions? Can you please recommend the best pathway for Big Hope Project to conduct classes for the Social Equity Program? Is an RFQ the best path forward?

We are planning a testimonial workshop to empower local constituents regarding upcoming initiatives. The goal is to have our community ready to engage in public meetings about pertinent issues. The focus of the training will be on expanding areas of disproportionate impact so that more Black people harmed by the war on drugs have access to the social equity program (State level). We will also educate our community about the ZBA process from the BCB licensing process (City level). If you could make a brief appearance and give your take on how impactful testimonials effect your decision making on issues. We would be very grateful.

If you have any questions or concerns please contact through text 8573858285 or email me

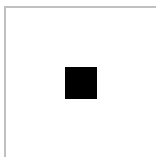
On Fri, Dec 3, 2021 at 3:43 PM Bruce Stebbins <Bruce.Stebbins@cccmass.com> wrote:

Harry – Thanks again for your time this afternoon and for reaching out. I was encouraged to hear how you are paying it forward and supporting your community.

Attached is a link to the most recent Disproportionately Impacted Areas report that the commission was presented back in the spring. The commission did not vote to accept the final report yet. As I mentioned, I would welcome your thoughts and comments as you review it.

[20210310_DI_Study_Report.pdf \(masscannabiscontrol.com\)](https://masscannabiscontrol.com/20210310_DI_Study_Report.pdf)

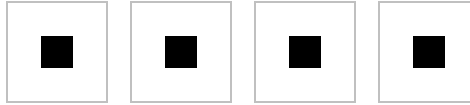
Thanks again for reaching out. Look forward to speaking again.



Bruce Stebbins, *Commissioner*
Pronouns: He, Him, His
Cannabis Control Commission
Union Station
[2 Washington Square](#)
[Worcester, MA 01604](#)
(O) 774.415.0443

Bruce.Stebbins@CCCMass.com

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From: Randy Musto <rmm6677@hotmail.com>

Sent: Tuesday, February 22, 2022 7:47 PM

To: Cannabis Control Commission <commission@cccmass.com>

Subject: PUBLIC COMMENT DISPROPORTIONATELY IMPACTED AREAS


Attention Cannabis Commission:

To my dismay to give applause to the SEP program is quite convoluted. Cohort #3 the applicants have been chosen but currently in a holding pattern. While the SEP program entrepreneurs are waiting with anticipation the current License holders continue to open more Cannabis Dispensaries. At times it seems the larger conglomerates are actually monopolies.

Being under the delusion that a SEP participant will receive guidance and preference and advantages is very deceiving.

Sincerely, Randy M Musto

Sent from my iPhone



From: brandey rodriguez <brandeyrodriguez@gmail.com>
Sent: Wednesday, February 9, 2022 6:40:41 PM
To: Cannabis Control Commission <commission@cccmaass.com>
Subject: Public Comment: Disproportionately Impacted Areas

To whom it may concern,

The city of Lawrence is a great area for growing business opportunities. The ADI maps keeps Lawrence residents and entrepreneurs out of opportunities because Lawrence is not included. I am a person who is interested in these opportunities but don't have access to it and my local city government has made it even more difficult to enter the market because they voted against cannabis. Weed exists in this city but the opportunities to go legal are few. Including Lawrence to the ADI map would allow young residence of Lawrence to learn and expand their knowledge about weed and the laws that pertain to it. I believe adding Lawrence to the ADI map would be a progressive and great opportunity.

From: John Wanless <jtwanless@yahoo.com>
Sent: Tuesday, February 1, 2022 5:31 PM
To: Cannabis Control Commission <commission@cccmass.com>
Subject: Public Comment: Disproportionately Impacted Areas

To the Commission:

The huge leap from compensating drug war victims to compensating "communities" is at best misguided and, at worst, a scam.

If it were only Blacks that got arrested for marijuana and made second-class citizens for life, maybe it would be a good idea to just look at Black communities. - But, of course, that is not the case.

FBI statistics show that 40 percent of all arrests for marijuana are of white people, while 60 percent are of Blacks. How can this injustice for millions of white victims be ignored? Isn't discrimination against smaller groups a bad thing?

Further, these "social equity" programs don't even help a significant number of Black victims of the war on marijuana consumers. Just a very few, lucky (well connected?) Blacks will benefit.

What we should do instead is simply compensate ALL the victims of this insane witch-hunt. Younger victims should get paid job training and placement. Older victims should just get a pension. Funds could come out of the marijuana taxes, and, clearly would be the best use of those funds.

Thank for your consideration of my views.

Sincerely, John Wanless

Memorandum

To: Chair O'Brien and Commissioners Camargo, Concepcion and Roy
Cc: Executive Director Collins, COO Stack and CPO White
From: Commissioner Stebbins
Date: November 1, 2022
Subject: Executive Director Performance Evaluation Tool and Schedule

PURPOSE: To review a draft Executive Director Performance Evaluation Tool and schedule at the November meeting and adopt a final version at its December 2022 meeting.

REQUEST ACTION BY: December 8, 2022

BACKGROUND: At the Commission's November 2021 public meeting, the commissioners adopted a new Executive Director Performance Evaluation and Compensation Process. The new process focused on transparency, providing the Executive Director meaningful input from commissioners and the chance to discuss that input and feedback. The process also incorporated a new process for considering compensation in collaboration with the Commission's Chief People Officer (CPO). The commissioners also adopted a corresponding timeline for providing input, compiling the performance feedback, reviewing that input with the Executive Director and returning to an open public meeting to approve any change in compensation. In 2022, we are also considering a new performance assessment tool to be considered by commissioners for any comments and feedback.

Because the Commission will have a December meeting, the addition of that meeting will require a new review timeline to be considered. The following timeline is provided for the commissioners' consideration.

SCHEDULE

| | |
|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| December 2022 | Presentation by Executive Director on progress toward meeting and achieving 2022 goals. |
| | Appointment of one commissioner to report back to the full commission at a public meeting (no later than March) with a salary recommendation for the entire body to consider. |



| | |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| January 2023 | At the January Commission meeting, the Executive Director will present 2023 goals and seek approval from commissioners. |
| January 16, 2023 | Completed performance assessments by individual commissioners provided to CPO by COB. CPO then to compile all comments without attribution into one overall assessment. |
| February 2023 | Appointed commissioner to meet with Executive Director to review compiled review and discuss salary considerations. |
| March 2023 | Appointed commissioner makes public presentation at full Commission meeting. |

RECOMMENDATION: To review the draft performance review tool and schedule and provide comments or edits during the November public meeting and adopt the final version at the commission's December 2022 meeting.

Cannabis Control Commission

Job Description

Department: Information Technology

Reports to: Director of IT & Security
Operations

Job Title: Senior IT Support Specialist

FLSA Status: Non-Exempt

I. PURPOSE OF THE JOB

Under the direction of the Director of Information and Security Operations, the Senior IT Support Specialist will provide Tier 2 helpdesk and desktop support, perform system administration functions, provide user training and manage the Helpdesk ticketing system for the Commission. This role will supervise Desktop Support Analyst activities. Desktop support is defined as, but not limited to, managing LAN operations at the site, software and hardware installations, inventory control and management, troubleshooting, network account management, and second-level training.

II. ESSENTIAL FUNCTIONS AND RESPONSIBILITIES

- Manage employee onboarding and offboarding including account setup, computer setup and supporting technology such as Microsoft Intune and Autopilot. Recommend improvements for the onboarding and offboarding process;
- Manage the Helpdesk ticketing system and assure that IT Helpdesk requests are responded to in a timely manner;
- Oversee Desktop Support Specialist(s), provide training, documentation, and act as a resource.
- Provide Tier 2 IT support for escalation of issues from Desktop Support Specialist and advanced issues;
- Manage the IT Asset Management Tracking System by collecting, recording, and maintaining inventory of all technology assets;
- Provide software and device training at the manager's discretion with a view toward process improvement;
- Manage the Commission Identity and Access Management (IAM) including users, user devices, access controls, groups and associated platforms such as Microsoft Intune, Autopilot, Azure Active Directory, Azure Directory Services;
- Responsible for software and platform license management;
- Assist in the management of Microsoft Teams and SharePoint environments;
- Assist the support and administration of third-party platforms, perform user account creation and disabling;



- Maintain and support the Commission's high cybersecurity posture, maintain cybersecurity training logs (KnowBe4), assure security software is installed and up to date, respond to cybersecurity incidents;
- Interface with the Commonwealth's EOTSS IT team to provide support to required state platforms as needed.
- Perform system analysis and troubleshooting functions for LAN/WAN infrastructure;
- Provide support for the Commission's Intranet
- Review and Approve Metrc API Request
- Assist Systems Administrator in the operating, upgrading and management of Commission's network and technology infrastructure;
- Responsible for problem escalation through appropriate channels of all technology related issues.

III. OTHER DUTIES AND RESPONSIBILITIES

- Maintain the highest standards of personal, professional, and ethical conduct and support the Commission's goals for a diverse and culturally aware workforce;
- Required to lift 35 pounds and push 65 pounds of computer equipment;
- Assumes personal responsibility to maintain technical proficiency;
- Occasional off-hour/weekend work may be required to meet IT goals and deadlines; and
- Ability to work in and travel between the Commission's headquarters in Worcester and the satellite office in Boston.

IV. KNOWLEDGE AND SKILLS

- Organized self-starter and effective collaborator, showing a strong interest in systems and process improvement;
- Strong technical, analytical, and problem-solving skills, including root cause analysis;
- Demonstrated ability to analyze business situations, create processes, and demonstrate problem-solving and analytical thinking skills for successful support;
- Strong communication skills with the ability to tailor information that establishes rapport;
- Strong Analytical and troubleshooting skills;
- Excellent oral and written communications skills;
- Demonstrated strong organizational and customer service skills, and attention to detail;
- Excellent technical knowledge of network and PC hardware, including Microsoft Office Suite (M365), Windows Desktop Operating Systems, Microsoft Teams and SharePoint, PC hardware configuration skills;
- Ability to make decisions in a timely manner; and
- Ability to work independently and with a team.



V. EDUCATION AND EXPERIENCE

- Bachelor's Degree in Business, Computer Science, Management Information Systems, or related field from an accredited institution of higher education required; Advanced degree preferred;
- Minimum 3-5 years of technical support experience;
- Demonstrated experience supporting the Microsoft suite of products. Preference is given to applicants with relevant Microsoft Certifications: MCDST, MCSE, MCSA, MTA;
- Experience with mobile devices – smartphones, iPad, Mobile Device Management;
- Experience supporting Windows 10/11, MAC experience a bonus;
- Experience supporting The Microsoft M365 suite of applications, experience with MS Dynamics/Power Platform a plus; and
- Experience working with people from diverse cultural and ethnic backgrounds.

VI. SALARY RANGE: \$65,000 - \$75,000



Memorandum

To: Chair O'Brien, Commissioners Camargo, Concepcion, Roy & Stebbins
Cc:
From: Shawn Collins, Executive Director
Christine Baily, General Counsel
Steven Laduzinski, Associate General Counsel
Date: November 4, 2022
Subject: November Public Meeting-Commission Consideration and Vote on Review of
New HCA Requirements
– FOR INFORMATION

We recommend that the Commission consider and vote on a decision not to review certain new requirements pertaining to Host Community Agreements (HCAs), until the Commission has promulgated regulations.

Background

An Act relative to equity in the cannabis industry, St. 2022, c. 180 (Act), at [Session Law - Acts of 2022 Chapter 180 \(malegislature.gov\)](#), became effective as of November 9, 2022. This statute establishes new provisions requiring HCAs to comply with G. L. c. 94G, § 3 (d) (1), (2) (i) to (iii), and (3), at [General Law - Part I, Title XV, Chapter 94G, Section 3 \(malegislature.gov\)](#) (New HCA Requirements).¹ Because municipalities are responsible for implementing the "Local

¹ Under G. L. c. 94G, § 3(d), there are several new requirements:

“(1) A marijuana establishment or a medical marijuana treatment center seeking a new license or renewal of a license to operate or continue to operate in a municipality that permits such operation shall negotiate and execute a host community agreement with that host community setting forth the conditions to have a marijuana establishment or medical marijuana treatment center located within the host community, which shall include, but not be limited to, all stipulations of responsibilities between the host community and the marijuana establishment or medical marijuana treatment center.

“(2)(i) Notwithstanding any general or special law to the contrary, a host community agreement may include a community impact fee for the host community; provided, however, that no host community agreement shall include a community impact fee after the eighth year of operation of a marijuana establishment or a medical marijuana treatment center. The community impact fee shall: (A) be reasonably related to the costs imposed upon the municipality by the operation of the



control” provisions of the statute, the Commission will likely be voting on applications for licensure, including for renewal, where municipalities and applicants have not entered into an HCA incorporating the new requirements.²

marijuana establishment or medical marijuana treatment center, as documented pursuant to subparagraph (iii); (B) amount to not more than 3 per cent of the gross sales of the marijuana establishment or medical marijuana treatment center; (C) not be effective after the marijuana establishment or medical marijuana treatment center’s eighth year of operation; (D) commence on the date the marijuana establishment or medical marijuana treatment center is granted a final license by the commission; and (E) not mandate a certain percentage of total or gross sales as the community impact fee.”

“(ii) Notwithstanding any general or special law to the contrary, the community impact fee shall encompass all payments and obligations between the host community and the marijuana establishment or a medical marijuana treatment center. The community impact fee shall not include any additional payments or obligations, including, but not limited to, monetary payments, in-kind contributions and charitable contributions by the marijuana establishment or medical marijuana treatment center to the host community or any other organization. Payment of the community impact fee shall be due annually to the host community, with the first payment occurring not sooner than upon the first annual renewal by the commission of a final license to operate the marijuana establishment or medical marijuana treatment center. Any other contractual financial obligation that is explicitly or implicitly a factor considered in, or is a condition of a host community agreement, shall not be enforceable. Nothing in this section shall preclude a marijuana establishment or a medical marijuana treatment center from voluntarily providing organizations with monetary payments, in-kind contributions and charitable contributions after the execution of the host community agreement; provided, however, that a host community agreement shall not include a promise to make a future monetary payment, in-kind contribution or charitable contribution.”

“(iii) Any cost imposed upon a host community by the operation of a marijuana establishment or medical marijuana treatment center shall be documented by the host community and transmitted to the licensee not later than 1 month after the date of the annual renewal of a final license to operate the marijuana establishment or medical marijuana treatment center and shall be a public record as defined by clause Twenty-sixth of section 7 of chapter 4 and chapter 66. If a licensee believes the information documented and transmitted by a host community is not reasonably related to the actual costs imposed upon the host community in the preceding year by the operation of the marijuana establishment or medical marijuana treatment center, the licensee may bring a breach of contract action against the host community and recover damages, attorneys’ fees and other costs encompassed in the community impact fee that are not reasonably related to the actual costs imposed upon the city or town.”

² To the extent that a potential plaintiff would be inclined to challenge a decision to approve a license application, that plaintiff would need to establish standing.

Discussion and Recommendation

Ultimately, municipal officials are responsible for interpreting and implementing the statute at the local level. Municipalities should come into compliance with the new HCA requirements as soon as they are able. Municipalities do not have to wait for the Commission to promulgate regulations by or before November 9, 2023, given that its regulations will be consistent with the new statutory requirements. Communities are therefore advised that they should consult counsel to consider whether their existing or pending HCAs conform with the statute.

For these reasons, we recommend that the Commission not review applicants' compliance with these requirements until the Commission has promulgated regulations under the above-mentioned statutory sections. G. L. c. 94G, § 3 (d) (5)-(6). See G. L. c. 94G, § 4 (a) (xxix) (authorizing the Commission to review, regulate, enforce and approve HCAs under § 3 [d]). This will allow the Commission additional time to consult with Commission staff and external stakeholders and to draft regulations that benefit from their input.

Under G. L. c. 94G, § 3 (d) (4), a municipality can waive the HCA requirement through a written submission to the Commission. Accordingly, the Commission will develop an appropriate form for use by municipalities and all applicants, so that they may easily obtain such a waiver if one is granted locally.

We will remind other state and local officials to consult their own counsel to address new statutory requirements under their jurisdiction. For example, the Commission is not preventing the Department of Revenue from collecting appropriate taxes, including the local tax option, or municipalities from collecting host community impact fees in the regular course.

In sum, this approach allows the Commission an appropriate opportunity to establish, consistent with past process, thoughtful regulations that benefit from broad engagement and input, while not halting or hindering our existing licensing process, including those applicants currently pending before the Commission. Relatedly, our regulatory process will prioritize those items addressed within and required by the Act.

Motion

If the Commission supports this recommendation, the motion could include the following:

The Commission votes to not consider applicants' compliance with G. L. c. 94G, § 3 (d) (1), (2) (i) to (iii), (3), until the Commission has promulgated relevant regulations, which will occur on or before November 9, 2023. Further, the Commission encourages communities to consult counsel in order to consider whether their existing or pending Host Community Agreements conform with the new statutory requirements.

Memorandum

To: Commissioners
Cc: Shawn Collins, Executive Director; Cedric Sinclair, Chief Communications Officer
From: Matt Giancola, Director of Government Affairs and Policy
Date: November 10, 2022
Subject: November 2022 Government Affairs Update

Massachusetts State House Update

Commissioner Nurys Camargo met separately with Treasurer Deborah Goldberg, and staff from the Office of the Governor and Attorney General's Office to discuss the pending Social Equity Advisory Board.

Chair Shannon O'Brien met with Cannabis Policy Committee Chair Daniel Donahue to discuss general updates in the cannabis industry.

Municipal Update

Commissioners Nurys Camargo and Bruce Stebbins met with Springfield Mayor Domenic Sarno, City staff, and Commission staff to discuss general updates in the cannabis industry.

Commissioners Nurys Camargo, Bruce Stebbins and Government Affairs and Commission staff met with officials from the City of Framingham and Town of Natick to discuss the Commission's licensing and regulatory framework.

Commissioners Nurys Camargo, Bruce Stebbins, and Government Affairs staff met with officials from the City of Boston to discuss social consumption licensing.

Municipal Law Unit

The Attorney General's Municipal Law Unit (MLU) issued two marijuana-related [decisions](#) this month.

Town of Whately: The MLU approved three Articles adopted by the Whately Annual Town Meeting from May 2022. The Town has added the definitions of Marijuana Delivery Operator and Marijuana Courier to its list of Marijuana Establishments. The MLU advises the Town to ensure consistency with the Commission's definitional regulations.

Town of Princeton: The MLU approved, with substantial comment, three Articles adopted by the Princeton Annual Town Meeting from May 2022 regarding the zoning of adult use Marijuana Establishments. The Town is prohibiting adult use cultivation and product manufacturing in its Residential-Agricultural, Business, and Business-Industrial districts, however, it is regulating and



allowing medical marijuana treatment centers. Because the three zoning districts constitute the only zones in the Town, these by-laws effectively ban one or more license types from operating within its borders. Under G.L. c.94G, Section 3, the question may need to come before the voters at a municipal election before the by-law can take effect. The MLU has advised the Town to consult with its counsel for further advice.





Cannabis Control Commission

Monthly Public Meeting

November 10, 2022 at 10:00 a.m.

Via Microsoft Teams



Agenda

1. Call to Order
2. Commissioners' Comments and Updates
3. Minutes for Approval
4. Executive Director's Report
5. Staff Recommendations on Changes of Ownership
6. Staff Recommendations on Provisional Licenses
7. Staff Recommendations on Final Licenses
8. Staff Recommendations on Renewals
9. Commission Discussion and Votes
10. New Business that the Chair did not Anticipate at the Time of Posting
11. Next Meeting Date and Adjournment



Executive Director's Report

Highlights from Licensing Data*

- 24 applications awaiting first review
- 12 applications for Commission consideration
- 50 applications awaiting supplemental review
- 96,486 certified active patients



Licensing Applications | November 10, 2022

The totals below are number of licenses approved by stage.

| Type | # |
|-----------------------------------------------|--------------|
| Pre-Certified/Delivery Endorsed Microbusiness | 182 |
| Provisionally Approved | 154 |
| Provisional License | 524 |
| Final License | 60 |
| Commence Operations | 454 |
| Total | 1,374 |

➔ + 138

* Note: This represents the increase
since November 2021

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



Licensing Applications | November 10, 2022

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

| Type | Economic Empowerment | Social Equity Program | Disadvantaged Business Enterprise | Total |
|-----------------------------------------------|----------------------------|------------------------------|-----------------------------------|-------------|
| Pre-Certified/Delivery Endorsed Microbusiness | 39 | 136 | 24 | 182 |
| Provisionally Approved | 13 | 23 | 40 | 154 |
| Provisional License | 29 | 68 | 104 | 524 |
| Final License | 1 | 7 | 4 | 60 |
| Commence Operations | 17 | 24 | 47 | 454 |
| Total | 99 [7% of total] | 258 [19% of total] | 219 [16% of total] | 1374 |

+0.6%

+3.7%

+0.3%

* Note: This represents the increase since November 2021



Licensing Applications | November 10, 2022

| Type | Pending Application | Pre-Certified Endorsement | Initial License Declined | Provisionally Approved | Provisional License | Final License | Commence Operation | Total |
|------------------------------------------------------|---------------------|---------------------------|--------------------------|------------------------|---------------------|---------------|--------------------|--------------|
| Craft Marijuana Cooperative | 2 | - | 0 | 0 | 4 | 0 | 0 | 6 |
| Marijuana Courier License | 11 | - | 0 | 0 | 8 | 1 | 9 | 29 |
| Marijuana Courier Pre-Certification | 11 | 93 | 0 | - | - | - | - | 104 |
| Independent Testing Laboratory | 1 | - | 0 | 3 | 5 | 2 | 10 | 21 |
| Marijuana Cultivator | 61 | - | 2 | 52 | 181 | 25 | 92 | 413 |
| Marijuana Delivery Operator License | 12 | - | 0 | 1 | 18 | 0 | 4 | 35 |
| Marijuana Delivery Operator Pre-Certification | 15 | 87 | - | - | - | - | - | 102 |
| Marijuana Microbusiness | 5 | - | 0 | 10 | 15 | 2 | 7 | 39 |
| Marijuana Product Manufacturer | 39 | - | 1 | 48 | 135 | 14 | 79 | 316 |
| Marijuana Research Facility | 8 | - | 0 | 0 | 0 | 0 | 0 | 8 |
| Marijuana Retailer | 60 | - | 1 | 38 | 156 | 16 | 245 | 516 |
| Marijuana Transporter with Other Existing ME License | 3 | - | 0 | 2 | 2 | 0 | 3 | 10 |
| Microbusiness Delivery Endorsement | 1 | 2 | 0 | 0 | 0 | 0 | 1 | 4 |
| Third Party Transporter | 8 | - | 0 | 0 | 0 | 0 | 4 | 12 |
| Total | 237 | 182 | 4 | 154 | 524 | 60 | 454 | 1,615 |



Licensing Applications | November 10, 2022

| Type | Pending Application | Pre-Certified Endorsement | Initial License Declined | Provisionally Approved | Provisional License | Final License | Commence Operation | Total |
|--------------------------------|---------------------|---------------------------|--------------------------|------------------------|---------------------|---------------|--------------------|------------|
| Marijuana Cultivator (Indoor) | 49 | - | 1 | 48 | 165 | 16 | 76 | 355 |
| Marijuana Cultivator (Outdoor) | 12 | - | 1 | 4 | 16 | 9 | 16 | 58 |
| Total | 61 | - | 2 | 52 | 181 | 25 | 92 | 413 |



Cultivation Applications | November 10, 2022

| Type | Pending Application | Initial License Declined | Provisionally Approved | Provisional License | Final License | Commence Operation | Total |
|----------------------------------------------|---------------------|--------------------------|------------------------|---------------------|----------------|--------------------|------------|
| Cultivation Tier 1 (Up to 5,000 sq. ft.) | 14 | 0 | 9 | 34 | 1 | 18 | 76 |
| Cultivation Tier 2 (5,001-10,000 sq. ft.) | 13 | 0 | 13 | 51 | 7 | 22 | 106 |
| Cultivation Tier 3 (10,001-20,000 sq. ft.) | 11 | 2 | 9 | 42 | 4 | 15 | 83 |
| Cultivation Tier 4 (20,001-30,000 sq. ft.) | 3 | 0 | 5 | 12 | 3 | 9 | 32 |
| Cultivation Tier 5 (30,001-40,000 sq. ft.) | 1 | 0 | 7 | 7 | 2 | 8 | 25 |
| Cultivation Tier 6 (40,001-50,000 sq. ft.) | 3 | 0 | 3 | 8 | 3 | 5 | 22 |
| Cultivation Tier 7 (50,001-60,000 sq. ft.) | 2 | 0 | 1 | 4 | 1 | 3 | 11 |
| Cultivation Tier 8 (60,001-70,000 sq. ft.) | 0 | 0 | 0 | 1 | 1 | 1 | 3 |
| Cultivation Tier 9 (70,001-80,000 sq. ft.) | 3 | 0 | 1 | 3 | 1 | 2 | 10 |
| Cultivation Tier 10 (80,001-90,000 sq. ft.) | 1 | 0 | 1 | 1 | 1 | 4 | 8 |
| Cultivation Tier 11 (90,001-100,000 sq. ft.) | 10 | 0 | 3 | 18 | 1 | 5 | 37 |
| Total | 61 | 2 | 52 | 181 | 25 | 92 | 413 |
| Total Maximum Canopy (Sq. Ft.) | 2,150,000 | | 1,465,000 | 5,000,000 | 875,000 | 2,720,000 | - |

64%

13%

* Note: percentage is of “Total” applications/licenses



MMJ Licensing and Registration Data | November 10, 2022

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

| MTC Licenses | # |
|---------------------|------------|
| Provisional | 40 |
| Final | 2 |
| Commence Operations | 100 |
| License Expired | 44 |
| Total | 186 |

* Note: the Medical Use of Marijuana Program has now reached 100 operational MTCs. The Commission has issued 51 commence operations notices to MTCs since transferring jurisdiction of the program from the Department of Public Health.

| MMJ Program | # |
|-------------------------------------------|-----------------|
| Certified Patients | 102,122 (-3) |
| Certified Active Patients | 96,486 (+15) |
| Active Caregivers | 7,700 (-1) |
| Registered Certifying Physicians | 307 (+0) |
| Registered Certifying Nurse Practitioners | 111 (+0) |
| Registered Physician Assistants | 1 |
| Ounces Sold | 88,129 |



Equity Programming and Community Outreach Overview

Thursday, November 10th, 2022

Cannabis Control Commission Public Meeting

Silea Williams, Director of Equity Programming & Community Outreach

Our Team

Equity Programming and Community Outreach (EPCO):

- Cedric Sinclair, Chief Communications Officer
- Silea Williams, Director of Equity Programming & Community Outreach
- Steven Carosello, Project Coordinator
- Akilah Armstrong, Project Coordinator

Open Positions:

- Manager of Community Outreach
 - **Reviewing applications**
- Manager of Equity Programming & Strategic Partnerships
 - **Reviewing applications**

What is Equity?

Equality



= Sameness

Equity



= Fairness

Equity Program & Community Outreach Overview

- We promote the inclusion of communities disproportionately harmed by marijuana arrests and incarceration into the cannabis industry through programming and community outreach initiatives.
- The Social Equity Program (SEP)
 - First statewide social equity program of its kind in the Nation;
 - Programming catering to various interests, such as cannabis entrepreneurs, ancillary business owners, and prospective Registered Agents.

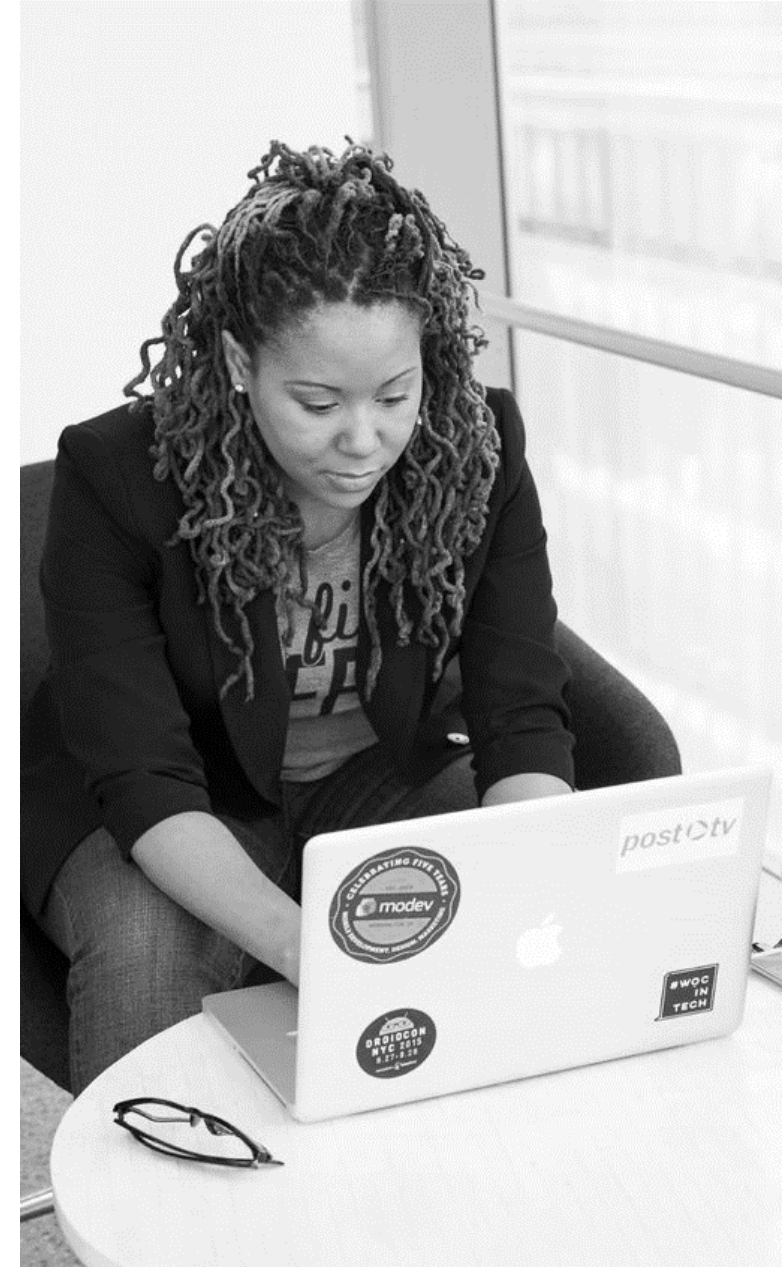
Social Equity Program (SEP)

SEP Overview

The Social Equity Program (SEP) creates sustainable pathways into the cannabis industry for individuals most impacted by the War on Drugs, marijuana prohibition, disproportionate arrest, and incarceration.

The SEP seeks to provide participants with education, skill-based training, and tools for success in the industry across four areas: entrepreneurship, managerial-level workforce development, re-entry and entry-level workforce development, and ancillary business support.

Upon completion of this program, participants will have acquired tools and training to apply for and obtain a license through the Cannabis Control Commission. However, completion of the program does not guarantee licensure.



Social Equity Program

Track Overview

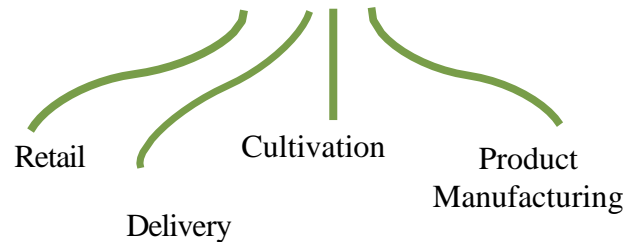
Each track,
Entrepreneur, Core,
Entry and Ancillary are
comprised of several
courses which
encompass a complete
curriculum.



Entrepreneur

Those seeking licensure
and ownership

Sub-tracks based on
participant interest:



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



Core

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

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



Entry

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

All Entry Track
Participants are
encouraged to take
Universal Courses



Ancillary

Those with existing skills
that are directly
transferable to working
with or supporting
cannabis businesses.
Inventors and developers
of new cannabis
accessories and
tools.

Social Equity Program ELIGIBILITY

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

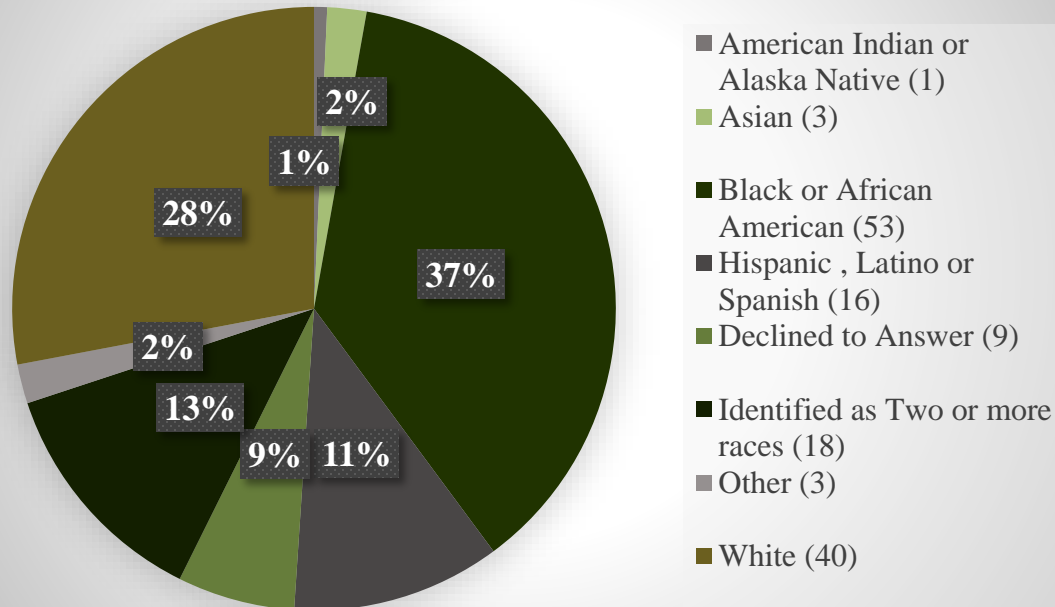
1. Residency in an Area of Disproportionate Impact (ADI) for at least five of the preceding 10 years and income does not exceed 400% of Area Median Income (AMI);
2. A drug conviction, not limited to marijuana, or continuance without a finding and residency in Massachusetts for at least the preceding 12 months;
3. Married to or the child of an individual with a drug conviction, not limited to marijuana, or continuance without a finding and residency in Massachusetts for the preceding 12 months.
4. Any individual listed as an Owner on an original certification of an Economic Empowerment Priority Applicant

**** Participants must maintain at minimum 51% ownership in the business to maintain a Social Equity Participant/EEA Certification ****

Social Equity Program - Cohort I

Demographic Overview

Social Equity Program Participants

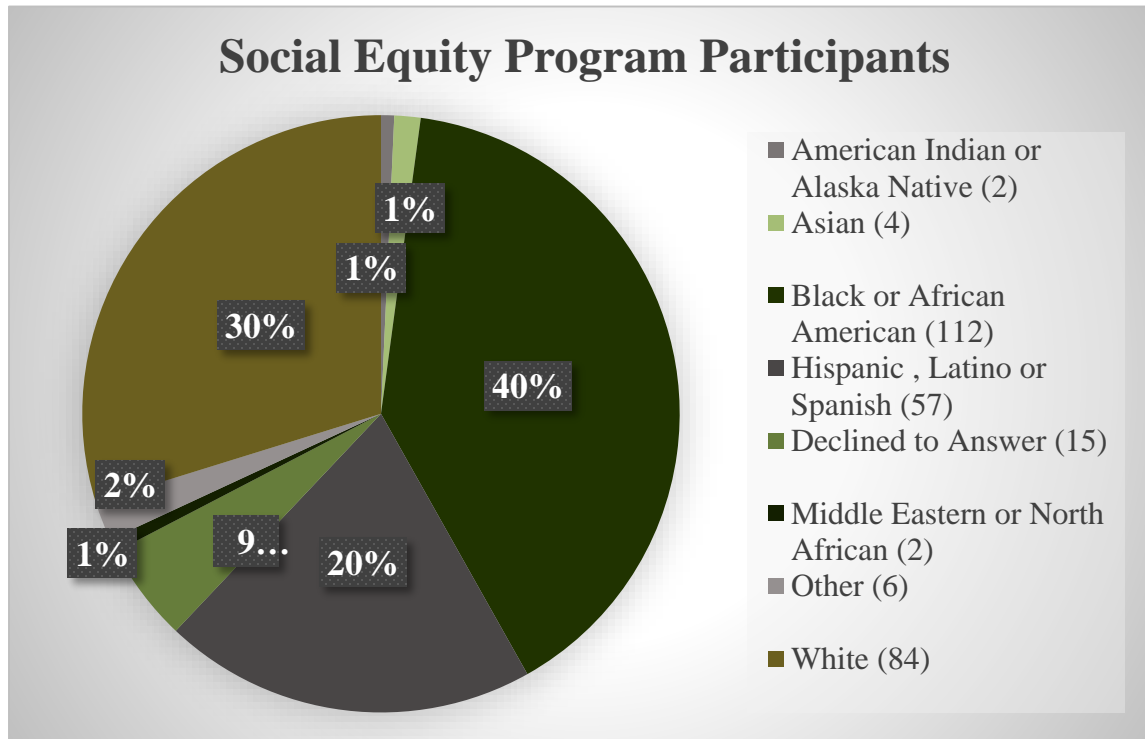


| Track Interest | # of Participants | Percentage |
|----------------|-------------------|------------|
| Ancillary | 13 | 9.09% |
| Core | 7 | 4.9% |
| Entrepreneur | 111 | 77.62% |
| Entry | 12 | 8.39% |
| Total | 143 | |

Percentages are approximate and rounded to the nearest percentage point.

Social Equity Program - Cohort II

Demographic Overview



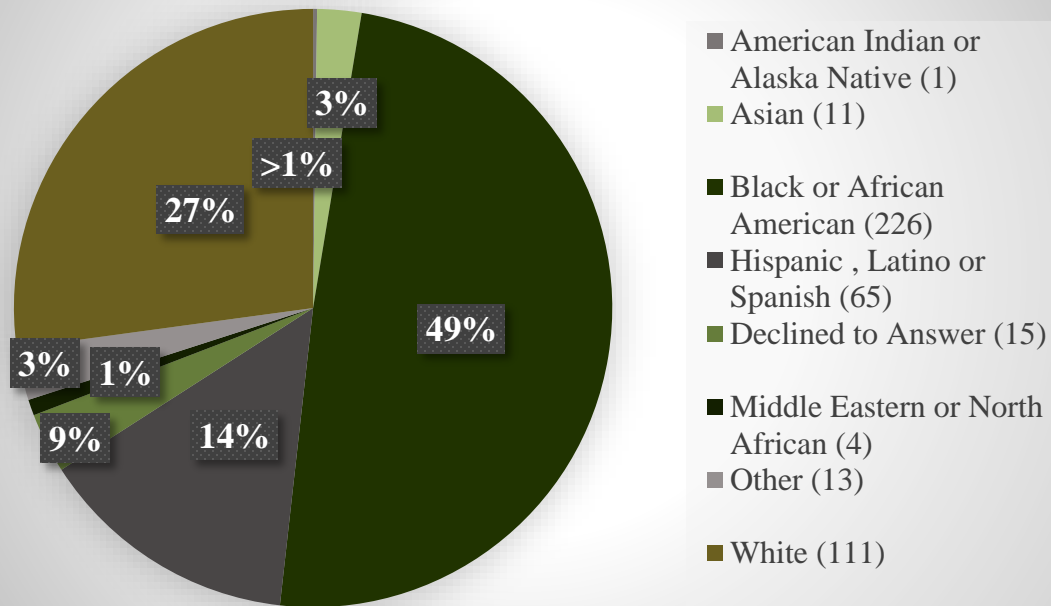
| Track Interest | # of Participants | Percentage |
|----------------|-------------------|------------|
| Ancillary | 8 | 2.84% |
| Core | 19 | 6.74% |
| Entrepreneur | 244 | 86.52% |
| Entry | 11 | 3.90% |
| Total | 282 | |

Percentages are approximate and rounded to the nearest percentage point.

Social Equity Program - Cohort III

Demographic Overview

Social Equity Program Participants



| Track Interest | # of Participants | Percentage |
|----------------|-------------------|------------|
| Ancillary | 10 | 2.24% |
| Core | 38 | 8.50% |
| Entrepreneur | 385 | 85.20% |
| Entry | 13 | 2.90% |
| Total | 446 | |

Percentages are approximate and rounded to the nearest percentage point.

Social Equity Program Fiscal Year '22 Overview

- Managed Cohort III recruitment and orientation;
- Executed 48 live technical assistance instructional courses for Cohort III, with learning vendor, Greenlight Business Solutions.
- Surveyed SEP participants seeking input regarding advanced coursework initiatives;
- Developed a community outreach tool kit with the digital and traditional communications team
- Hosted *Intersection of Cannabis and Equity* event at the Fierce Urgency of Now (FUN) festival.



Community Outreach Toolkit

MASSACHUSETTS' FIRST-IN-THE-NATION, STATEWIDE

Social Equity Program

Helping those harmed by the War on Drugs enter the regulated cannabis industry in Massachusetts

- Free access to technical assistance and training;
- Jump the state's licensing queue and waive certain fees;
- Receive pre-certification for your license application and exclusive opportunities to own a delivery and/or social consumption business in our state;
- Connect to mentors, experts, and more!



FACT Participants have joined our program based on income, residency in a designated, disproportionately impacted area, and/or a conviction they, their spouse, or parent experienced for a previous drug crime.

 Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

MassCannabisControl.com/Equity/SocialEquityProgram

APPLY TO JOIN THE NATION'S FIRST STATEWIDE

Social Equity Program

Helping those harmed by the War on Drugs enter the regulated cannabis industry in Massachusetts

- Have you lived in a Massachusetts disproportionately impacted area for at least five of the past ten years, and your household income is less than 400% of the Area Median Income? *Visit our website for clarification.*
- Have you lived in Massachusetts for the past year or more, and over your lifetime, have you, your spouse, or parent experienced 1) a drug conviction, 2) a continuance without a finding for a similar offense, or 3) an equivalent in another state?
- Are you an Economic Empowerment Applicant who met qualifications for residency, race, or serving or promoting disproportionately impacted areas?

Then you may be eligible for benefits that support participation in the legal marketplace. Learn more and select the programming track that pursues your goals.



FACT Marijuana use is roughly equal among Blacks and Whites, yet Blacks are 3.73 times as likely to be arrested for marijuana possession.

 Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

ACLU, "The War on Marijuana in Black and White," 2015

MassCannabisControl.com/Equity/SocialEquityProgram

LEARN ABOUT YOUR RIGHTS REGARDING YOUR CORI

Expungement and Sealing

Your Criminal Offender Record Information or "CORI" can make life difficult by complicating your search for employment, housing, licensing, and more. In Massachusetts, you can seal or expunge these records to mitigate some consequences.

For more information, visit the *Massachusetts Court System and Massachusetts Probation Services website at:*
<https://www.mass.gov/expunge-your-criminal-record>



FACT Most marijuana convictions will not prevent a person from working at a marijuana business in Massachusetts, unless it involved distribution to a minor.

Contact Equity@CCCMass.com with questions.

 Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

MassCannabisControl.com/Equity/SocialEquityProgram

WORKFORCE DEVELOPMENT IN THE

Cannabis Industry

Did you know as of 2022, 37 U.S. states have legalized medical marijuana use, and 19 have legalized adult-use?

- A 2022 *Leafly* report states there are a total of 428,059 full-time cannabis-related jobs nationwide.
- Since 2018, the Massachusetts adult-use market has generated \$3 billion in sales and supports 20,163 active jobs.
- *Business Insider* reports the U.S. cannabis industry is projected to be a \$100 billion market by 2030.



FACT Marijuana businesses in Massachusetts must submit a Diversity Plan and report progress on efforts to promote equity and industry participation among people of color; women; veterans; persons with disabilities; and LGBTQ+ individuals.

 Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

MassCannabisControl.com/Equity/SocialEquityProgram

Community Outreach Toolkit Overview

- Developing informational videos to simplify the SEP application process, which includes;
 - In-depth overview of the program and its benefits;
 - Tutorials and best practices for verifiable documentation; and
 - SEP criteria explainers.
- Re-developing the current Equity Programming page on the Commission's website to;
 - Streamline navigation for equity resources and documentation;
 - Increase user engagement and accessibility; and
 - Provide new content areas designed to enhance participant success.
- Producing digital content to promote and increase;
 - Awareness of equity programming and mission;
 - Participant profiles and stories; and
 - Thought-leadership from the cannabis equity community

Social Equity Program Fiscal Year '22 and '23 Overview

- Considering advanced coursework for the Social Equity Program
- Planning and implementing recruitment initiatives for Cohort IV
- Completing the 3-year strategic planning process
- Developing a workforce development and outreach portal



Questions?

Silea R. Williams

Director of Equity Programming and Community Outreach

Silea.Williams@CCCMass.com

Or

Equity@CCCMass.com

Commission Updates

- Open Outreach Services Bid:
 - COMMBUYS (BD-22-2018-CNB-CNB3-71816) through February 2023
 - Event managers, marketers, community engagement, and other firms encouraged to apply
- Scheduled METRC outages for internal infrastructure upgrades to improve performance, scalability, and reliability:
 - Saturday, December 10th, 10PM – Sunday, December 11th, 2AM
 - Sunday, December 11th, 10PM – Monday, December 12th, 2AM
 - Saturday, December 17th, 10PM – Sunday, December 18th, 2AM
 - Sunday, December 18th, 10PM – Monday, December 19th, 2AM



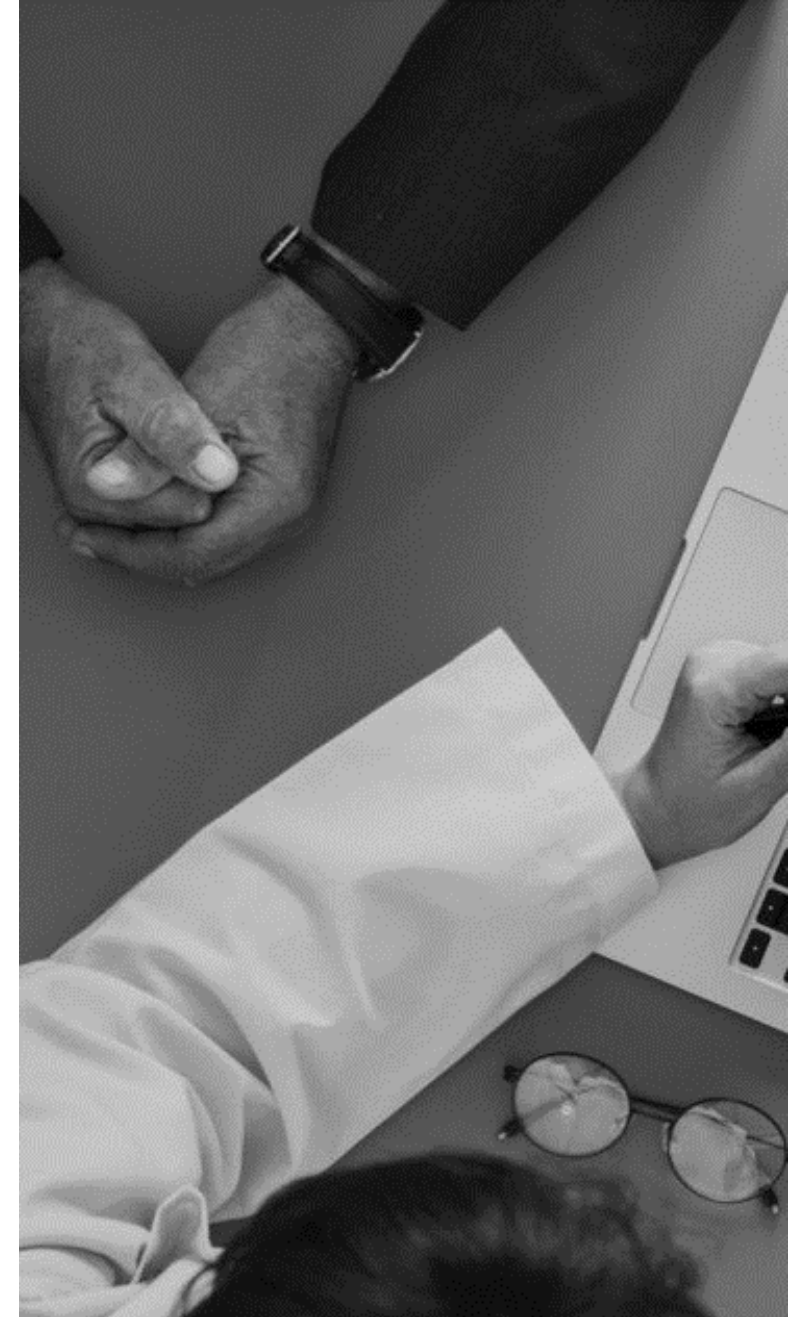
Commission Updates

- Regulations Process Update
 - Prioritizing those items required by Ch. 180 of the Acts of 2022
 - *Ex. HCAs, social consumption, etc.*
 - Organizing Commissioner and staff identified topics into categories to begin sorting what requires use of “working group” and what may be technical or ministerial.
 - Next steps: meetings with Commissioners to review/evaluate topics, delineate working groups and workload, and begin identifying and calendaring initial outreach opportunities.
 - Priorities throughout: active and meaningful stakeholder engagement, ensuring adequate time to review and evaluate implementation, understanding impact on other agency priorities, providing regular updates during public meetings.



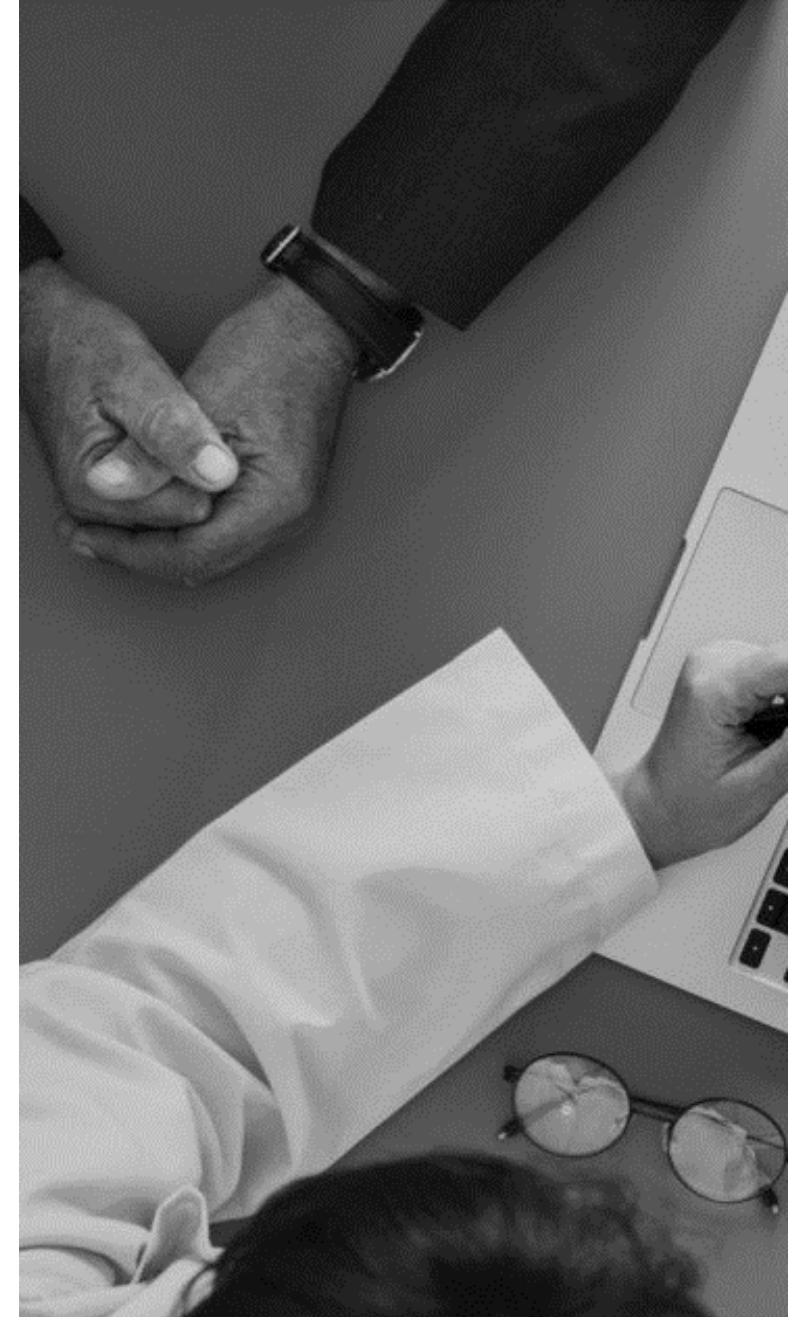
Hiring Update

- **Associate General Counsel (3 of 3)**
- **Investigators (7 of 8)**
- **Project Coordinator, Communications (2)**
 - Onboarded
- **Investigator**
- **Senior Press Secretary**
 - Internal staff promotion
- **Investigators (8 of 8)**
 - Final candidates' stage



Hiring Update

- **Legal Assistant**
- **Constituent Services Associate**
- **Fiscal Specialist**
- **Laboratory & Testing Analyst(s)**
- **Manager of Community Outreach**
- **Manager of Equity Programming and Strategic Partnerships**
- **Project Coordinator, Research**
 - Screening / Interview stage
- **Press Secretary (Closes 12/2)**
- **Desktop Support Analyst (Closes 12/2)**
 - Open positions





Staff Recommendations on Licensure

Staff Recommendations: Changes of Ownership

1. Ember Gardens Cape Cod, LLC
2. Temescal Wellness of Massachusetts, LLC



Staff Recommendations: Provisional Licenses

1. Curaleaf Processing, Inc. (#REN281303), Marijuana Research Facility
2. Delivered, Inc. (#MDA1303), Marijuana Delivery Operator
3. Debilitating Medical Condition Treatment Centers (#MRN281621), Retail
4. Ember Gardens Production, LLC (#MCN283722), Cultivation, Tier 3 / Indoor
5. Ember Gardens Production, LLC (#MPN282196), Product Manufacturer
6. Greenwayv, Inc. (#MCN283707), Cultivation, Tier 3 / Indoor
7. Greenwayv, Inc. (#MPN282209), Product Manufacturer
8. I & I Rose Garden, LLC (#MRN284031), Retail
9. Natural Agricultural Products, LLC (#MRN284177), Retail
10. Northeastcann, Inc. (#MRN284438), Retail
11. The Blue Jay Botanicals (#DOA100159), Marijuana Courier
12. Western Front, LLC (#MRN284389), Retail



Staff Recommendations: Final Licenses

1. B Leaf Wellness Centre, LLC (#MR281356), Retail
2. Beacon Compassion, Inc. d/b/a UpTop (#MR284569), Retail
3. Capeway Cannabis, LLC (#MR282446), Retail
4. Community Growth Partners Northampton Operations, LLC d/b/a Rebelle (#MC282162),
Cultivation, Tier 3 / Indoor
5. Green Meadow Farm, LLC (#MR284280), Retail
6. Green River Cannabis Company, Inc. (#MR282175), Retail
7. Holistic Health Group, Inc. d/b/a Suncrafted (#MR283126), Retail
8. KG Collective, LLC (#MR284181), Retail
9. Morando Brands, LLC (#MP281488), Product Manufacturing
10. Root 2 Naturals, LLC (#MB281675), Microbusiness)
11. Rooted In, LLC d/b/a Rooted in Roxbury (#MR284261), Retail
12. Sira Naturals, Inc. (#MP281613), Product Manufacturing
13. Solurge, Inc. (#MC281300), Cultivation, Tier 3 / Indoor
14. Southcoast Apothecary, LLC d/b/a Ascend (#MR283075), Retail



Staff Recommendations: Renewals

1. 6 Bricks, LLC. (#MRR206151)
2. 617 Therapeutic Health Care, Inc. (#MRR206242)
3. B.O.T Realty, LLC (#MRR206254)
4. Bada Bloom!, Inc. (#MCR140335)
5. COASTAL CULTIVARS, INC. (#MCR140343)
6. Coil Brothers LLC (#MPR243862)
7. Community Care Collective, Inc. (#MRR206215)
8. Community Growth Partners Northampton Operations LLC (#MCR140349)
9. dba EMJ LLC (#MCR140353)
10. Emerald Grove, Inc. (#MPR243872)
11. Emerald Grove, Inc. (#MCR140338)
12. Evergreen Strategies, LLC. (#MRR206248)
13. Gibby's Garden LLC (#MBR169298)
14. Green Era LLC (#MRR206246)
15. Green Era LLC (#MRR206245)
16. Green Era LLC (#MRR206217)
17. Green Highland LLC (#MCR140347)
18. Green Highland LLC (#MPR243883)
19. Green Highland LLC (#MRR206255)
20. Greenhouse Naturals LLC (#MRR206238)
21. Highdration LLC (#MPR243858)
22. I & I Rose Garden LLC (#MPR243868)
23. Impressed LLC (#MCR140316)
24. Just Healthy, LLC (#MRR206264)
25. Just Healthy, LLC (#MPR243889)
26. Just Healthy, LLC (#MCR140360)
27. JustinCredible Cultivation, LLC (#MCR140333)
28. Lifted Genetics, LLC (#MCR140320)
29. Littleton Apothecary LLC (#MRR206218)
30. Mainely Productions LLC (#MCR140357)



Staff Recommendations: Renewals

31. Massachusetts Green Retail, Inc. (#MRR206224)
32. New England Cannabis Corporation, Inc. (#MPR243867)
33. New England Cannabis Corporation, Inc. (#MCR140328)
34. New Green LLC (#MRR206210)
35. Nova Farms, LLC (#MPR243869)
36. Nova Farms, LLC (#MCR140329)
37. Other Side Agronomy, Inc. (#MCR140342)
38. Pepperell Roots, LLC (#MCR140366)
39. Pepperell Roots, LLC (#MPR243892)
40. Power Fund Operations (fka) Silver Therapeutics, Inc. (#MCR140375)
41. ProVerde Laboratories, Inc. (#ILR267910)
42. Pudding Hill Farm LLC (#MCR140374)
43. Smokey Leaf (#MRR206257)
44. TDMA LLC (#MRR206236)
45. Temescal Wellness of Massachusetts, LLC (#MPR243870)
46. Temescal Wellness of Massachusetts, LLC (#MCR140330)
47. Terpene Journey, LLC (#MRR206188)
48. The Blue Jay Botanicals, Inc. (#MRR206240)
49. The Green Harbor Dispensary, LLC (#MRR206233)
50. The Hub Craft, LLC (#MCR140314)
51. Volcann LLC (#MRR206253)
52. 4BROS, INC. (#RMD1325)
53. ACK Natural, LLC (#RMD1627)
54. Apothca, Inc. (#RMD1065)
55. ARL Healthcare (#RMD1085)
56. Cresco HHH, LLC (#RMD686)
57. Cultivate Leicester, Inc (#RMD485)
58. Ermont, Inc (#RMD225)
59. Sanctuary Medicinals, Inc. (#RMD605)
60. Sanctuary Medicinals, Inc. (#RMD1128)





Commission Discussion & Votes



The Commission is in recess
until 1:30

Commission Discussion & Votes

1. Access & Equity Group: Discussion on Disproportionately Impacted Areas



Review of 2021 DI Study and Recommendations

Diversity, Equity, and Inclusion:
Access and Equity Workgroup

November 10, 2022

Tiixa Chukwuezi, Sabiel Rodriguez, Andrew Carter, and Meghan Dube



Agenda

1. Introduction
2. Legal Framework
3. Historical Overview and Racial Disparities
4. People and Community
5. Dataset Areas of Opportunity
6. Research Recommendation
7. Research Procurement Recommendations
8. Policy Considerations

Introduction

December 2017

- Report: *The Impact of Drug and Marijuana Arrests on Local Communities in Massachusetts*
 - January 2018: *The Impact of Drug and Marijuana Arrests Within the Largest Cities of Massachusetts*
 - April 2018: *Identifying the Top 25% of Census Tracts in Boston, Worcester, Springfield, and Lowell according to Unemployment Data (2006-2010)*
- Completed by Dr. Jon Gettman, Professor of Criminal Justice at Shenandoah University in Winchester, Virginia

March 2021

- Report: *Identifying Disproportionately Impacted Areas by Cannabis Prohibition in Massachusetts*
- Completed by the University of Massachusetts Amherst Donohue Institute



Legal Framework: Statutory Authority

- The Commission enjoys broad legal authority with “all the powers necessary or convenient to carry out and effectuate its purposes.” G. L. 94G, § 4(a). One of the purposes the Commission must effectuate is building and maintaining an inclusive and equitable industry that accounts for the past harms of marijuana prohibition and enforcement.
- The Commission’s authority includes, but is not limited to, the power to promulgate regulations that are “consistent with this chapter [94G] for the administration, clarification and enforcement of laws regulating and licensing marijuana establishments.” G. L. 94G, § 4(a1/2). The Commission has the authority to implement, clarify and enforce the laws regulating adult and medical use marijuana.
- The Commission shall approve a marijuana establishment license application and issue a license if: the prospective marijuana establishment has submitted an application in compliance with regulations made by the commission, the applicant satisfies the requirements established by the commission, the applicant is in compliance with this chapter and the regulations made by the commission and the applicant has paid the required fee [...]. G. L. c. 94G, § 5 (b)(1).



Legal Framework: Procedures and Policies to Encourage Full Participation in the Regulated Industry

- As part of our statutory mandate, the Commission must adopt "procedures and policies to promote and encourage full participation in the regulated marijuana industry by people from communities that have previously been **disproportionately harmed by marijuana prohibition and enforcement and to positively impact those communities.**" G. L. c. 94G, § 4 (a 1/2) (iv).
- One of the policies adopted by the Commission to promote full participation in the regulated industry was to identify geographic areas harmed by cannabis prohibition and enforcement, known as Area of Disproportionate Impact. The Commission defined Area of Disproportionate Impact as “a geographic area identified by the Commission for the purposes identified in M.G.L. c. 94G, § 4(a½)(iv), and which has had historically high rates of **arrest, conviction, and incarceration related to Marijuana crimes.**” 935 CMR 500.002 and 501.002.
- The current regulatory definition limits an Area of Disproportionate Impact to areas with high rates of arrests, convictions and incarceration related to cannabis crimes only, it does not include other drugs, such as opioids, cocaine, heroin, etc.



Racial Disparities: Historical Overview

- The Marijuana Tax Act of 1937
 - The Marihuana Tax Act of 1937 was the most significant effort by the federal government to regulate the use of cannabis in the United States in the Twentieth century.
- The War on Drugs
 - In 1971, President Nixon declared the War on Drugs. In the decades following America's prison population went from 300,000 to more than 2 million.
- Legalization:
 - Between the start of the new industry in 1996 and 2018, 18 states voted on 62 marijuana-related ballot measures.
 - Overall, Massachusetts adult-use retailers have recorded over \$3.3 billion since the state first launched commercial sales in November 2018.



Racial Disparities: Impact of Legalization

- Although the total number of people arrested for marijuana possession and rates of arrests have decreased in states where cannabis is legal or decriminalized, the racial disparities in arrest rates in these states remain.
 - In 2018, Black people were four times more likely than white people to be arrested for marijuana possession in Massachusetts.
- In Massachusetts, racial disparities increase as one progresses through the criminal justice system.
 - Massachusetts significantly outpaced national racial disparity rates in incarceration, imprisoning Black people at a rate 7.9 times more and Hispanic people at a rate 4.9 times more than that of white people.
- There is a lack of Social Consumption spaces in Massachusetts.
 - Per the National Low Income Housing Coalition, across all public housing, about 45% of residents are African American, and a little over 20% are Hispanic.

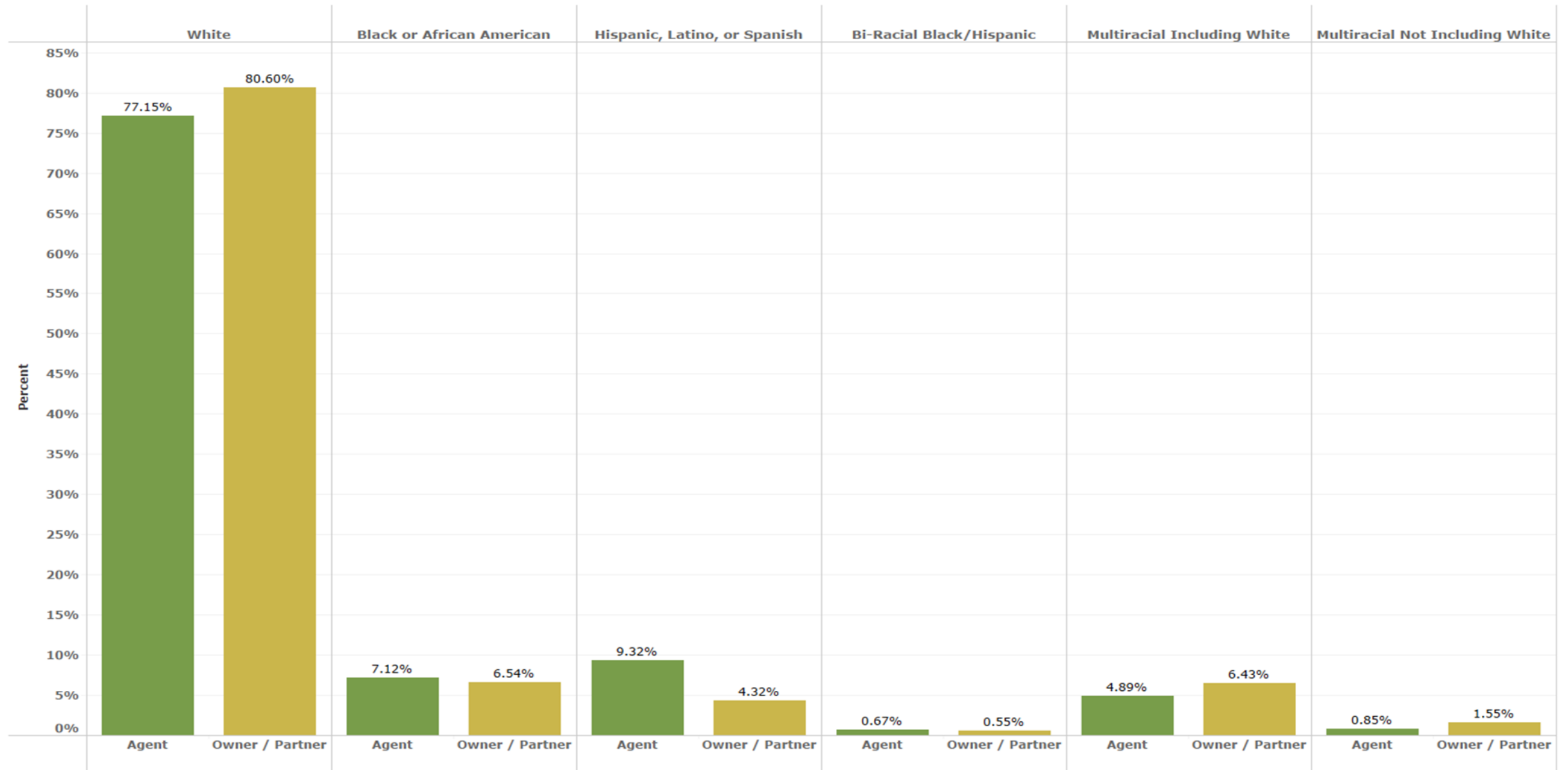


Racial Disparities: State of the Industry

- Systemic barriers, such as racism, and the disparities in the criminal justice system have left people of color less able to compete in the new capital-intensive cannabis industry. The Massachusetts cannabis industry was legalized with a promise of equity, but so far, the work remains ongoing.
- Black and Hispanic people represent a small percentage of owners and agents in the Massachusetts cannabis industry, despite the Commission's current social equity efforts, examples are below:
 - Expedited licensing review for Equity program participants and Disadvantaged Business Enterprises
 - Pre-certification and exclusive access to delivery and social consumption licenses
 - Fee waivers
 - Technical assistance and training
 - Mandatory Diversity Plans and Positive Impact Plans for all licensees

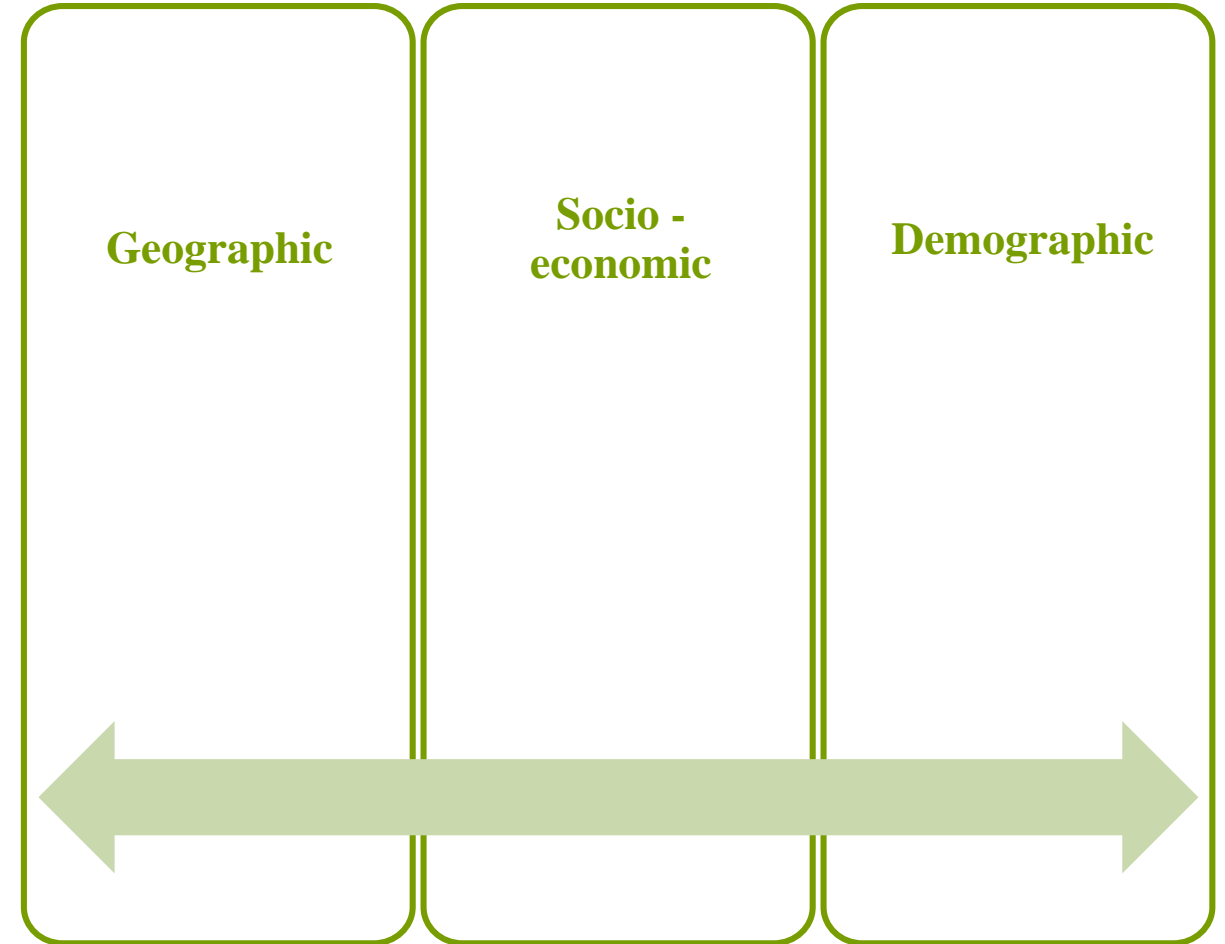


Percent of Agents and Owners/Partners (Commence Operations) by Race as of August 2022



People and Community

- How were geographic areas harmed by cannabis prohibition and enforcement?
- What data should be collected and assessed to capture the harms to a geographic area?
- Does the formula used to score areas of disproportionate impact account for the disproportionate harm to certain demographic communities?



Past and Current Study

Gettman Report

- Drug and marijuana arrest rates (2/3)
- Unemployment rates; Poverty level and Population size (1/3)
- *Race neutral*

UMASS Report

- Average annual number of drug arrests (0.5)
- Average annual rate of drug arrests per 100,000 population residents (0.5)
- Percent of people living in poverty (0.5)
- Percent of residents who are Black and/or Latino (0.5)

Dataset Areas of Opportunity: Gettman Study

Data Analyzed

- **Arrest data:** total drug and marijuana only drug arrest data from the Uniform Crime Reporting (UCR) program Summary Reporting System (SRS)
 - Total drug arrest data was available for 160 municipalities
 - Marijuana arrest data was available for 148 municipalities
- **Economic data:** from the American Community Survey (ACS)
- **Time period:** 2006 through 2010
 - Three years prior to Massachusetts cannabis decriminalization
 - Two years following Massachusetts cannabis decriminalization

Areas of Opportunity

- The researcher notes that racial disparities exist, yet the study was race neutral
- Alternative data sources that would allow for an increased number of municipalities to be considered
 - Total drug arrest UCR data was not available for 191 municipalities
 - Marijuana arrest UCR data was not available for 203 municipalities
- Impact of adult conviction, sentencing, incarceration or other sanctions
- Impact of juvenile arrests on employment and educational opportunities
- Quantitative and/or qualitative data for the period of 1971 (the declaration of the *War on Drugs*) to 2006, and 2011 through the present



Dataset Areas of Opportunity: UMass Study

Data Analyzed

- **Arrest data:** drug arrest data from the National Incident Based Reporting System (NIBRS) and the Boston Police Department (BPD)
 - Data was available for 295 municipalities
- **Demographic and socioeconomic data:** from the 2000 U.S. Census Bureau's Decennial Census and two ACS 5-year databases
- **Time period:** 2000 through 2017

Areas of Opportunity

- Alternative data sources that would allow for an increased number of municipalities to be considered
 - NIBRS data was not available for 55 municipalities
 - Data has since been obtained from Lawrence
- Impact of conviction, sentencing, incarceration or other sanctions
- Impact of juvenile arrests on employment and educational opportunities
- Socioeconomic changes of municipalities for the period of 1971 to the present
 - To account for the impact since the declaration of the greater War on Drugs as declared in 1971
- The formula used assigns equal weight to all variables, there is an opportunity to consider if race should be weighed more heavily to account for the War on People that the *War on Drugs* represents





Cannabis Arrest Data and the UMass Model

- **Recommendation:** Rerun the analysis from the UMass model, using only cannabis arrest data, include Lawrence data
 - Rerunning model using only cannabis arrest data better aligns to legislative and regulatory mandates to encourage full participation in the regulated industry by those disproportionately harmed by cannabis prohibition and enforcement
 - Commission's regulatory definition of ADI: means a geographic area identified by the Commission for the purposes identified in M.G.L. c. 94G, § 4(a½)(iv), and which has had historically high rates of arrest, conviction, and incarceration related to Marijuana crimes.
 - Study analyzed data from all drug arrests, but data was procured that can be analyzed at the cannabis arrest data level
- **Consideration 1:** Set a minimum DI score when creating a list – rather than a percentage of top ranking
- **Consideration 2:** Formula should account for disproportionate impact on Black and/or Hispanic/Latino people regardless of where reside in Commonwealth



State of the Data Analysis

- **Recommendation: Conduct a state of the data analysis to understand the universe of data available as well as costs and timelines associated with procurement, cleaning and analysis.**

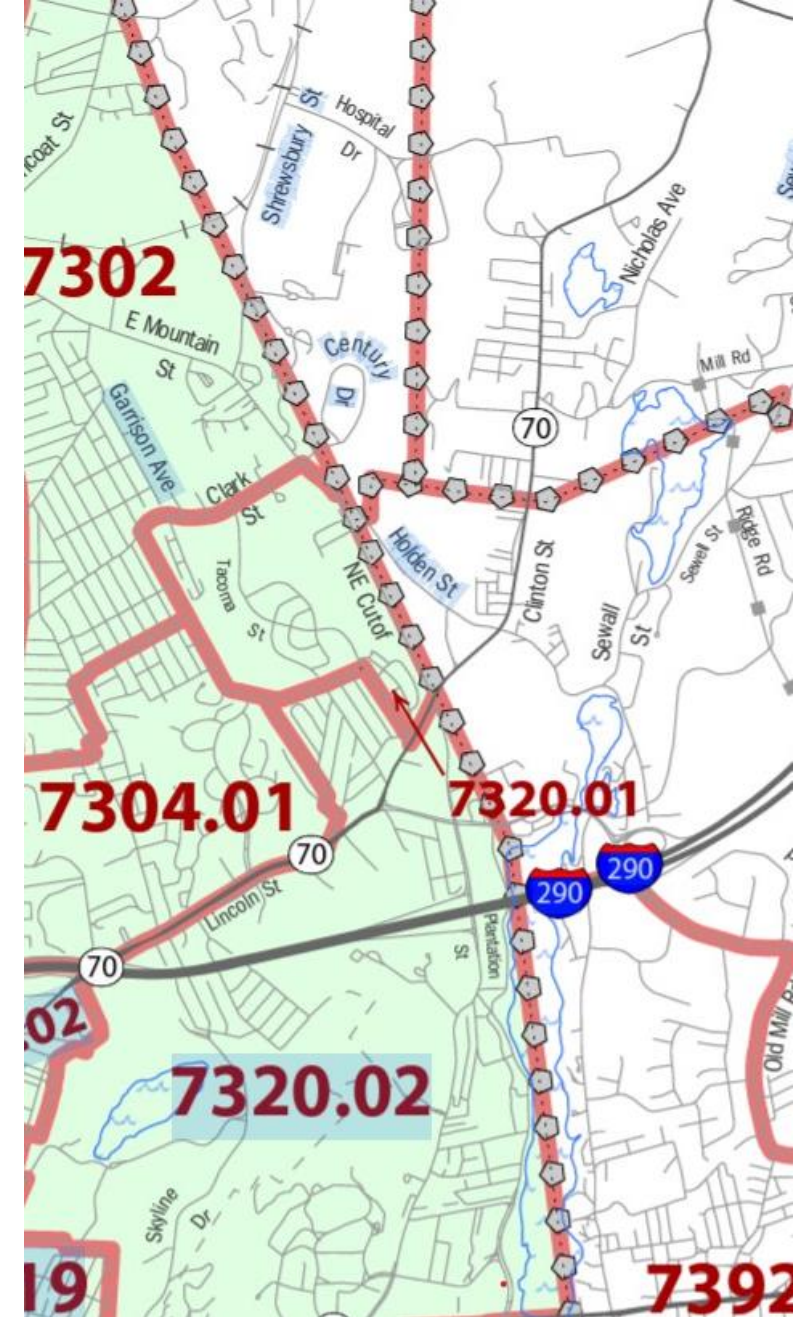
Datasets:

- Number and rates of adult cannabis arrests, convictions, and incarceration;
 - Number and rates of juvenile cannabis arrests, convictions, and detentions;
 - Percent of people living in poverty;
 - Percent of residents who report Black and/or Latino race/ethnicity;
 - Quantitative and qualitative data from 1971 to present; and
 - Any other data that the Commission deems necessary
- Purpose: Gain a better understanding of available data, as well as cost and time, to procure and analyze an additional study.



Census Tract 7320.01

- **Recommendation: Add census tract 7320.01 to the Commission's current ADI list**
 - Dr. Gettman report, *Identifying the Top 25% of Census Tracts According to Unemployment Data in The Largest Cities*, identified the tract as being a top tract but due to a clerical error it was not included on the ADI list
 - Tract had highest level of unemployment in Worcester (18.4%)
 - Tract represents public housing complex, Great Brook Valley



In Closing

- While these recommendations speak to how to utilize the ADI studies, this list is not the only tool the Commission has when striving to create and sustain an equitable industry. We acknowledge that the *War on Drugs* is a war on people, and the harms inflicted on Black, and Latino/Hispanic people occurred no matter where they live(d) in the Commonwealth. We support the Commission's ongoing work providing programming to those most harmed by cannabis prohibition and enforcement.
- In addition, these recommendations may have resource implications, in terms of time, money, and staff bandwidth. If the Commission chooses to act on any recommendations, we support the Executive Director in implementing the Commission's policy objectives.





Questions?

Commission Discussion & Votes

2. Draft Executive Director Performance Review Tool
3. Job Description: Senior IT Support Specialist
4. Consideration of New Host Community Agreement Requirements





Upcoming Meetings & Adjournment

Upcoming Meetings and Important Dates

Next Meeting Date

December 8

Monthly Public Meeting

Remote via Teams

10:00am





Additional Licensing Data

Licensing Applications | November 10, 2022

The totals below are all license applications received to date.

| Type | # |
|---------------------------------------|---------------|
| Pending | 237 |
| Withdrawn | 1,191 |
| Incomplete | 7,591 |
| Denied | 4 |
| Approved: Delivery Pre-certifications | 180 |
| Approved: Delivery Endorsements | 3 |
| Approved: Licenses | 1,191 |
| Total | 10,397 |



Licensing Applications | November 10, 2022

The totals below are number of licenses approved by category.

| Type | # |
|------------------------------------------------------|--------------|
| Craft Marijuana Cooperative | 4 |
| Marijuana Courier | 18 |
| Marijuana Delivery Operator | 23 |
| Independent Testing Laboratory | 20 |
| Marijuana Cultivator | 350 |
| Marijuana Microbusiness | 34 |
| Marijuana Product Manufacturer | 275 |
| Marijuana Research Facility | 0 |
| Marijuana Retailer | 456 |
| Marijuana Third Party Transporter | 4 |
| Marijuana Transporter with Other Existing ME License | 7 |
| Total | 1,191 |



Licensing Applications | November 10, 2022

| Status | # |
|--------------------------------------------------------------------|--------------|
| Application Submitted: Awaiting Review | 24 |
| Application Reviewed: More Information Requested | 193 |
| Application Deemed Complete: Awaiting 3rd Party Responses | 8 |
| All Information Received: Awaiting Commission Consideration | 12 |
| Applications Considered by Commission (includes Delivery Pre-Cert) | 1,378 |
| Total | 1,615 |



Licensing Applications | November 10, 2022

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

The 1,615 applications represent 880 separate entities

| Type | # |
|-------------------------------|--------------|
| MTC Priority | 259 |
| Economic Empowerment Priority | 120 |
| Expedited Review | 588 |
| General Applicant | 648 |
| Total | 1,615 |

| Type | # |
|----------------------------------------------|------------|
| Expedited: License Type | 76 |
| Expedited: Social Equity Participant | 271 |
| Expedited: Disadvantaged Business Enterprise | 172 |
| Expedited: Two or More Categories | 69 |
| Total | 588 |



Licensing Applications | November 10, 2022

| Type | Pending Application | Pre-Certified Endorsement | Initial License Declined | Provisionally Approved | Provisional License | Final License | Commence Operation | Total |
|--------------------------------|---------------------|---------------------------|--------------------------|------------------------|---------------------|---------------|--------------------|------------|
| Marijuana Cultivator (Indoor) | 49 | - | 1 | 48 | 165 | 16 | 76 | 355 |
| Marijuana Cultivator (Outdoor) | 12 | - | 1 | 4 | 16 | 9 | 16 | 58 |
| Total | 61 | - | 2 | 52 | 181 | 25 | 92 | 413 |



Cultivation Applications | November 10, 2022

| Type | Pending Application | Initial License Declined | Provisionally Approved | Provisional License | Final License | Commence Operation | Total |
|----------------------------------------------|---------------------|--------------------------|------------------------|---------------------|----------------|--------------------|------------|
| Cultivation Tier 1 (Up to 5,000 sq. ft.) | 14 | 0 | 9 | 34 | 1 | 18 | 76 |
| Cultivation Tier 2 (5,001-10,000 sq. ft.) | 13 | 0 | 13 | 51 | 7 | 22 | 106 |
| Cultivation Tier 3 (10,001-20,000 sq. ft.) | 11 | 2 | 9 | 42 | 4 | 15 | 83 |
| Cultivation Tier 4 (20,001-30,000 sq. ft.) | 3 | 0 | 5 | 12 | 3 | 9 | 32 |
| Cultivation Tier 5 (30,001-40,000 sq. ft.) | 1 | 0 | 7 | 7 | 2 | 8 | 25 |
| Cultivation Tier 6 (40,001-50,000 sq. ft.) | 3 | 0 | 3 | 8 | 3 | 5 | 22 |
| Cultivation Tier 7 (50,001-60,000 sq. ft.) | 2 | 0 | 1 | 4 | 1 | 3 | 11 |
| Cultivation Tier 8 (60,001-70,000 sq. ft.) | 0 | 0 | 0 | 1 | 1 | 1 | 3 |
| Cultivation Tier 9 (70,001-80,000 sq. ft.) | 3 | 0 | 1 | 3 | 1 | 2 | 10 |
| Cultivation Tier 10 (80,001-90,000 sq. ft.) | 1 | 0 | 1 | 1 | 1 | 4 | 8 |
| Cultivation Tier 11 (90,001-100,000 sq. ft.) | 10 | 0 | 3 | 18 | 1 | 5 | 37 |
| Total | 61 | 2 | 52 | 181 | 25 | 92 | 413 |
| Total Maximum Canopy (Sq. Ft.) | 2,150,000 | | 1,465,000 | 5,000,000 | 875,000 | 2,720,000 | - |



Licensing Applications | November 10, 2022

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

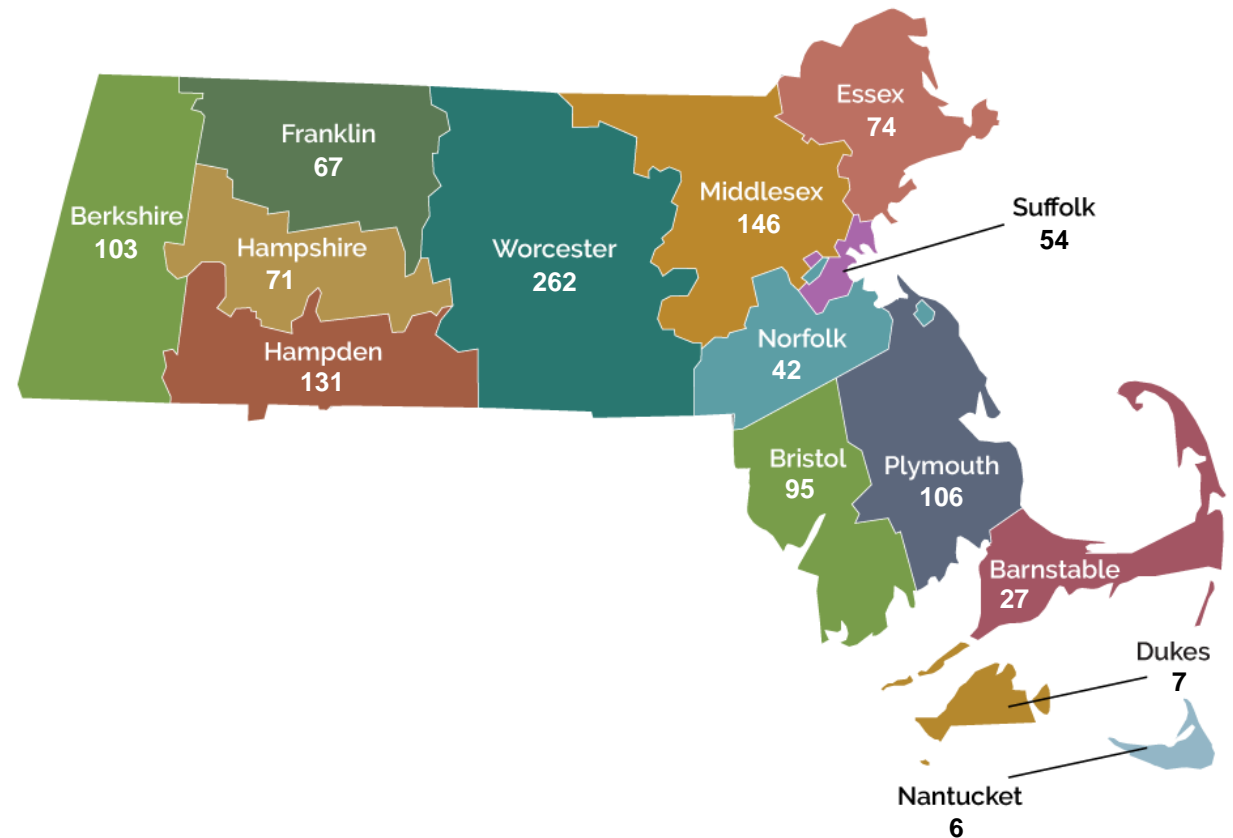
| Type | # |
|----------------------------------------------------------|------------|
| Craft Marijuana Cooperative | 2 |
| Delivery-Only Provisional Licensure (Part 2) | 11 |
| Delivery-Only Pre-Certification (Part 1) | 11 |
| Independent Testing Laboratory | 1 |
| Marijuana Cultivator | 61 |
| Marijuana Delivery Operator Provisional License (Part 2) | 12 |
| Marijuana Delivery Operator Pre-Certification (Part 1) | 15 |
| Marijuana Microbusiness | 5 |
| Marijuana Product Manufacturer | 39 |
| Marijuana Research Facility | 8 |
| Marijuana Retailer | 60 |
| Marijuana Transporter with Other Existing ME License | 3 |
| Microbusiness Delivery Endorsement | 1 |
| Third Party Transporter | 8 |
| Total | 237 |



Marijuana Establishment Licenses | November 10, 2022

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

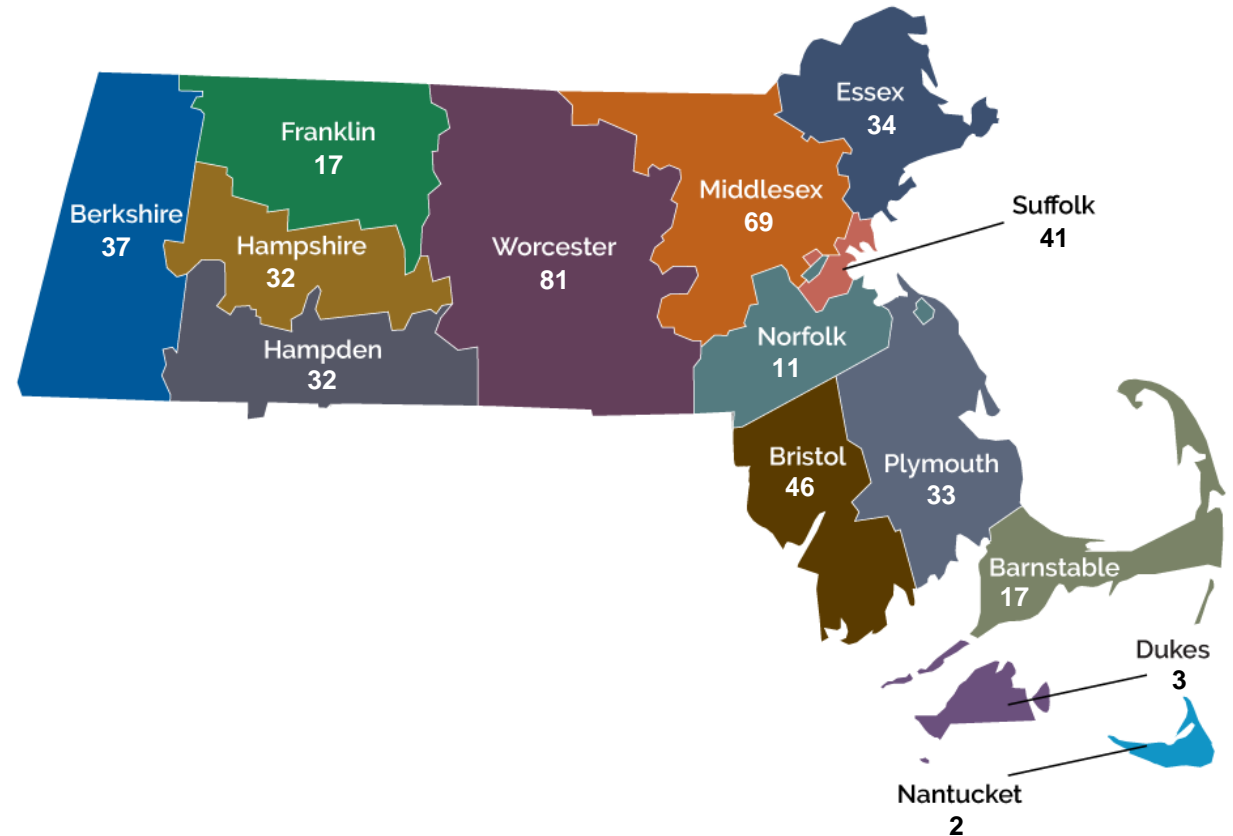
| County | # | + |
|--------------|--------------|-----------|
| Barnstable | 27 | 1 |
| Berkshire | 103 | 0 |
| Bristol | 95 | 2 |
| Dukes | 7 | 0 |
| Essex | 74 | 0 |
| Franklin | 67 | 2 |
| Hampden | 131 | 1 |
| Hampshire | 71 | 3 |
| Middlesex | 146 | 4 |
| Nantucket | 6 | 0 |
| Norfolk | 42 | 0 |
| Plymouth | 106 | 1 |
| Suffolk | 54 | 1 |
| Worcester | 262 | 2 |
| Total | 1,191 | 17 |



Marijuana Retailer Licenses | November 10, 2022

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

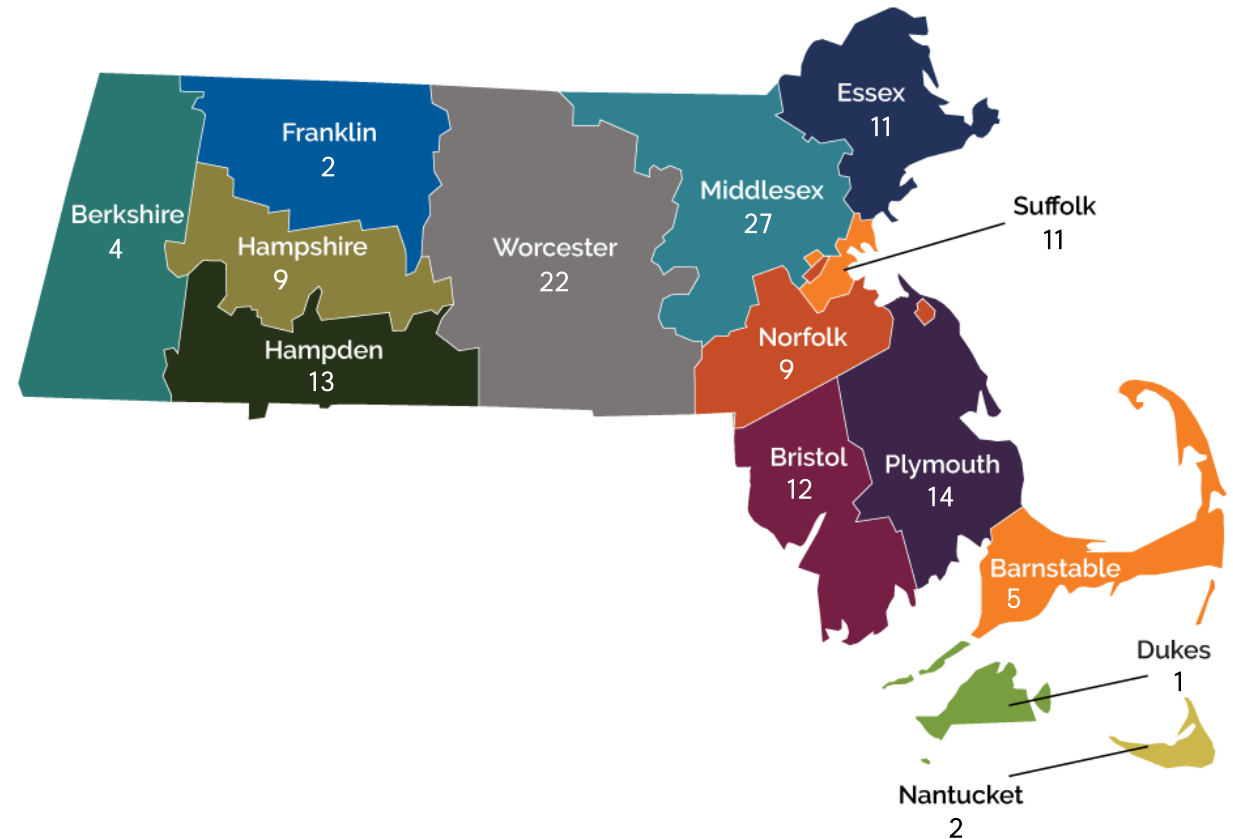
| County | # | +/- |
|--------------|------------|-----------|
| Barnstable | 17 | 1 |
| Berkshire | 37 | 0 |
| Bristol | 46 | 2 |
| Dukes | 3 | 0 |
| Essex | 34 | 0 |
| Franklin | 17 | 1 |
| Hampden | 32 | 0 |
| Hampshire | 32 | 1 |
| Middlesex | 69 | 3 |
| Nantucket | 2 | 0 |
| Norfolk | 11 | 0 |
| Plymouth | 33 | 0 |
| Suffolk | 41 | 1 |
| Worcester | 81 | 2 |
| Total | 455 | 11 |



Medical Marijuana Treatment Center Licenses (Dispensing) November 10, 2022

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

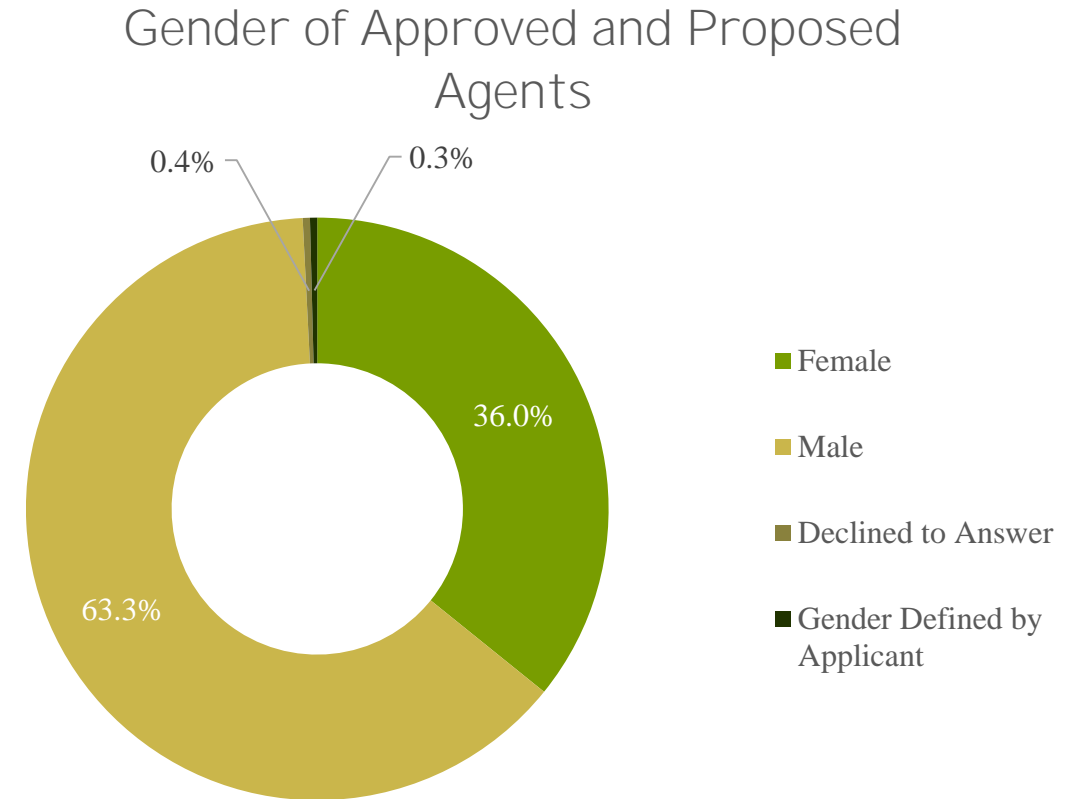
| County | # |
|--------------|------------|
| Barnstable | 5 |
| Berkshire | 4 |
| Bristol | 12 |
| Dukes | 1 |
| Essex | 11 |
| Franklin | 2 |
| Hampden | 13 |
| Hampshire | 9 |
| Middlesex | 27 |
| Nantucket | 2 |
| Norfolk | 9 |
| Plymouth | 14 |
| Suffolk | 11 |
| Worcester | 22 |
| Total | 142 |



Agent Applications | November 10, 2022

Demographics of Approved and Pending Marijuana Establishment Agents

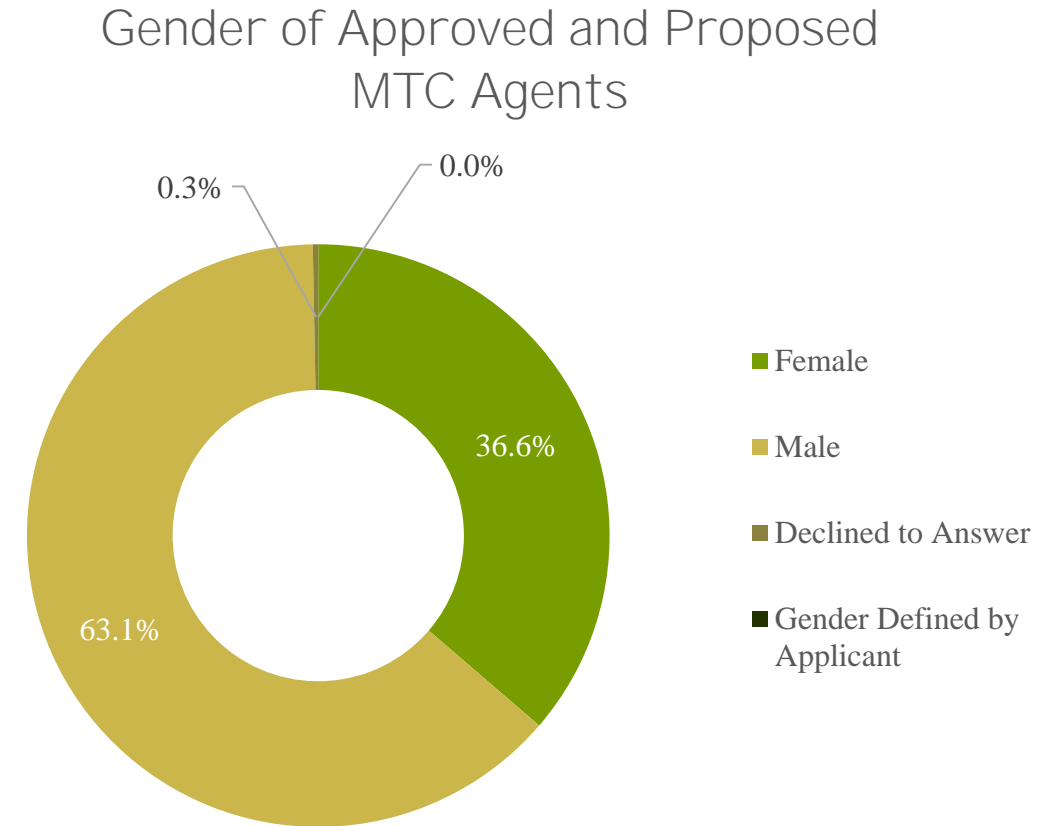
| Gender | # | % |
|-----------------------------|---|-------------|
| Female | | 36.0% |
| Male | | 63.3% |
| Declined to Answer | | 0.4% |
| Gender Defined by Applicant | | 0.3% |
| Total | | 100% |



Agent Applications | November 10, 2022

Demographics of Approved and Pending Medical Marijuana Treatment Center Agents

| Gender | # | % |
|-----------------------------|---|-------------|
| Female | | 36.6% |
| Male | | 63.1 % |
| Declined to Answer | | 0.3% |
| Gender Defined by Applicant | | 0.0% |
| Total | | 100% |

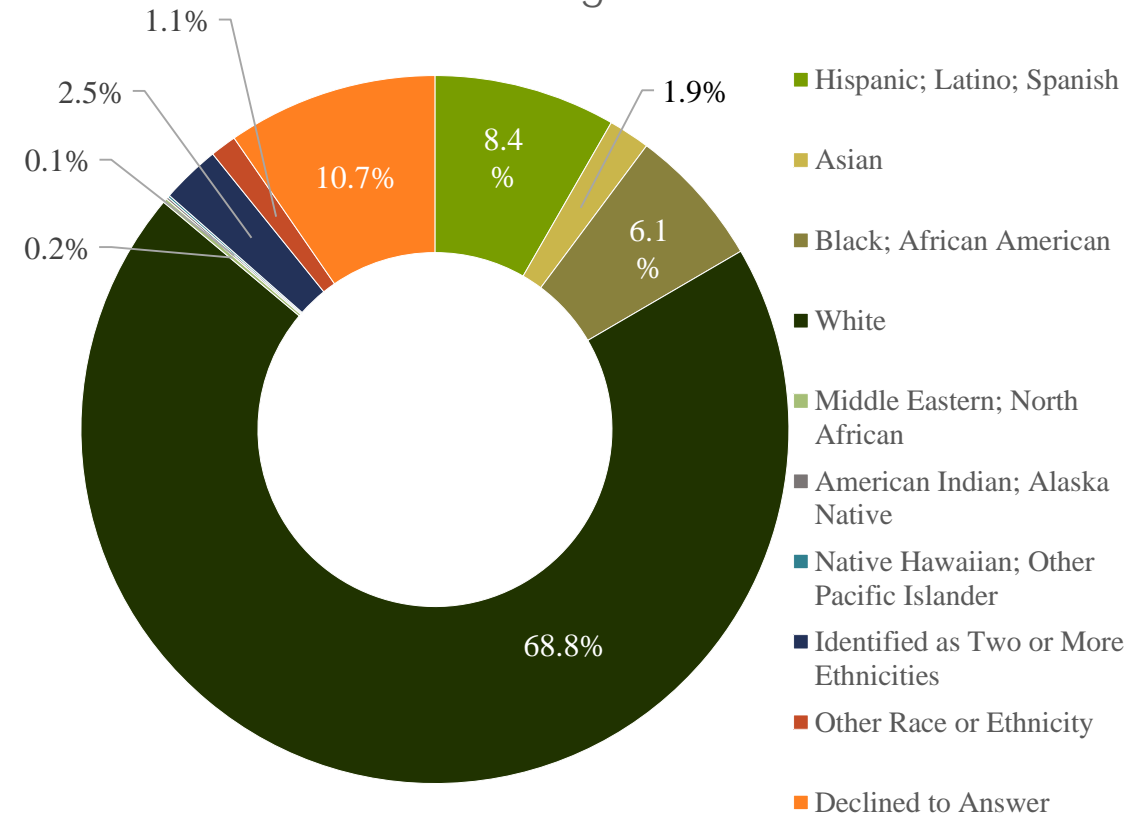


Agent Applications | November 10, 2022

Demographics of Approved and Pending ME Agents

| Race/Ethnicity | # | % |
|-----------------------------------------|---|-------------|
| Hispanic; Latino; Spanish | | 8.4% |
| Asian | | 1.9% |
| Black; African American | | 6.1% |
| White | | 68.8% |
| Middle Eastern; North African | | 0.2% |
| American Indian; Alaska Native | | 0.1% |
| Native Hawaiian; Other Pacific Islander | | 0.1% |
| Identified as Two or More Ethnicities | | 2.5% |
| Other Race or Ethnicity | | 1.0% |
| Declined to Answer | | 10.7% |
| Total | | 100% |

Race/Ethnicity of Approved and Proposed ME Agents

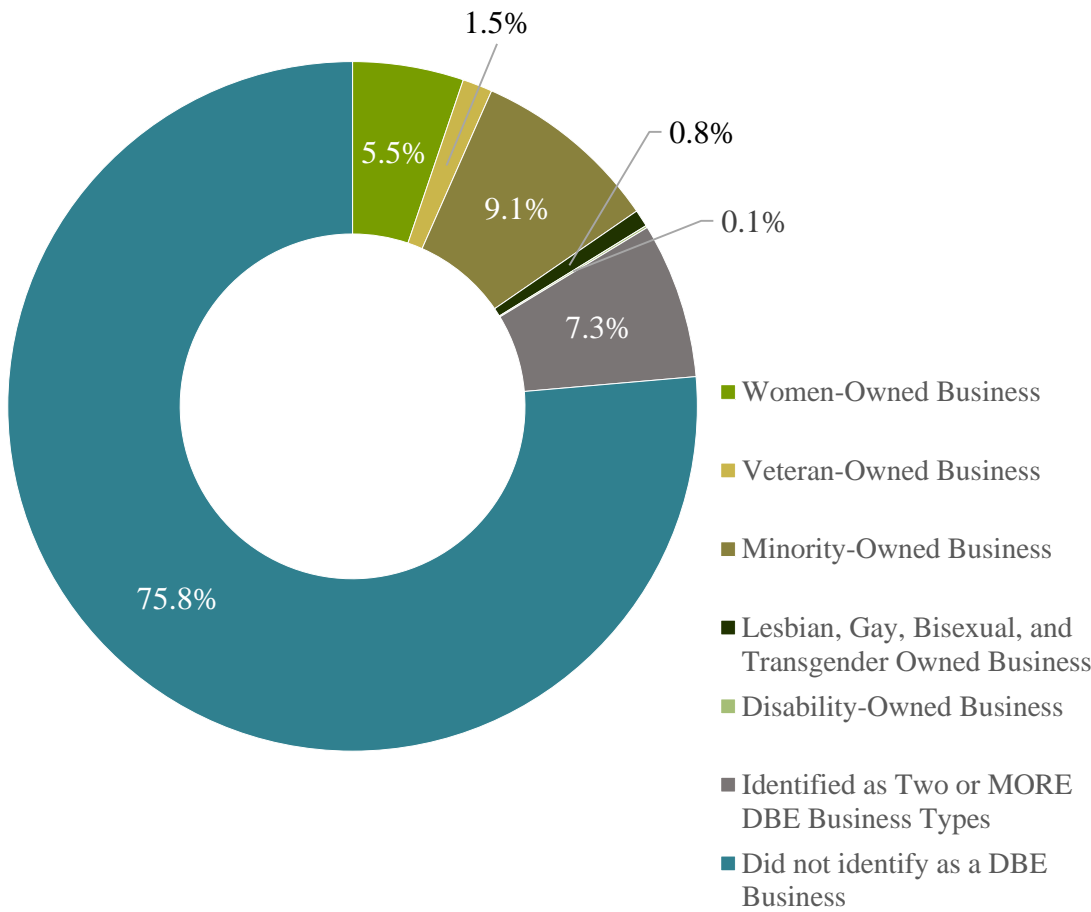


Licensing Applications | November 10, 2022

Disadvantaged Business Enterprise Statistics for Approved Licensees

| Type | # | % of Group |
|--------------------------------------------------------|---|-------------|
| Women-Owned Business | | 5.5% |
| Veteran-Owned Business | | 1.5% |
| Minority-Owned Business | | 9.1% |
| Lesbian, Gay, Bisexual, and Transgender Owned Business | | 0.8% |
| Disability-Owned Business | | 0.1% |
| Identified as Two or MORE DBE Business Types | | 7.3% |
| Did not identify as a DBE Business | | 75.8% |
| Total | | 100% |

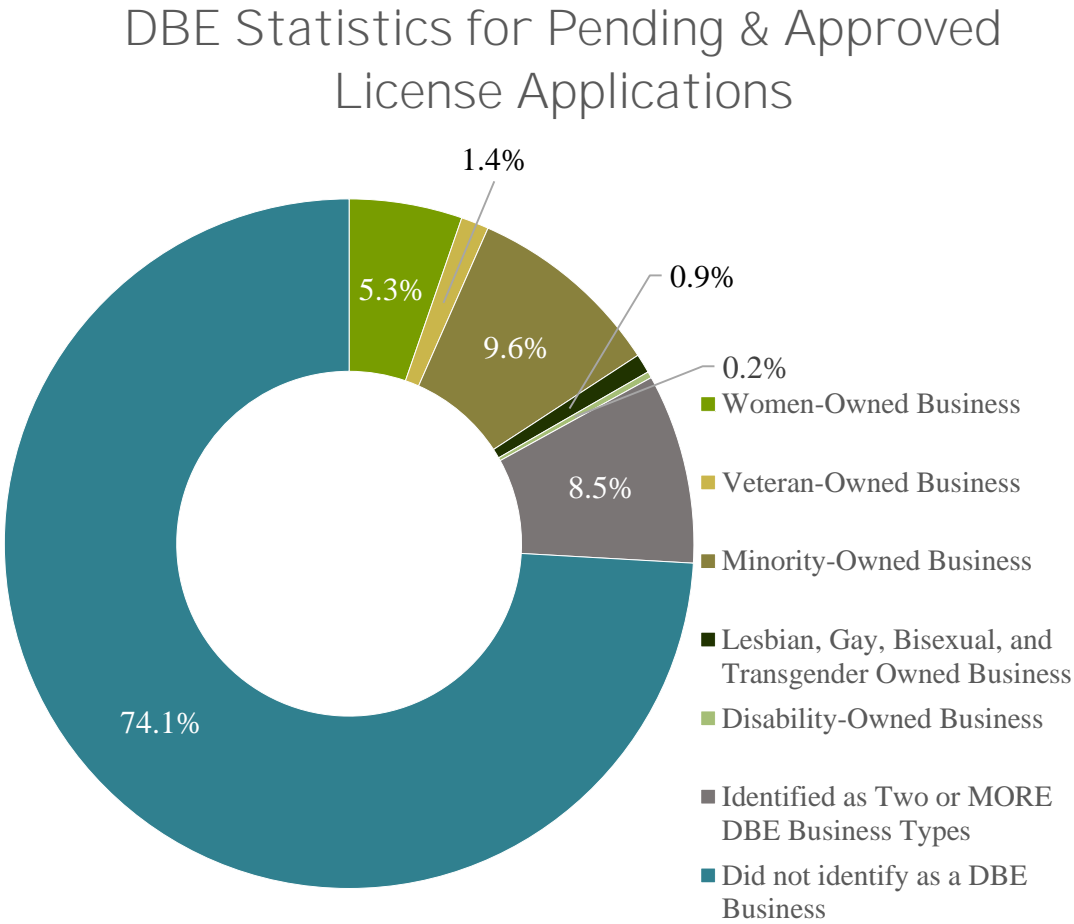
DBE Statistics Approved Licensees



Licensing Applications | November 10, 2022

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

| Type | # | % of Group |
|--------------------------------------------------------|---|-------------|
| Women-Owned Business | | 5.3% |
| Veteran-Owned Business | | 1.4% |
| Minority-Owned Business | | 9.6% |
| Lesbian, Gay, Bisexual, and Transgender Owned Business | | 0.9% |
| Disability-Owned Business | | 0.2% |
| Identified as Two or MORE DBE Business Types | | 8.5% |
| Did not identify as a DBE Business | | 74.1% |
| Total | | 100% |



Adult Use Agent Applications | November 10, 2022

51,989 Total Agent Applications:

- 326 Total Pending
 - 313 Pending Establishment Agents
 - 13 Pending Laboratory Agents
- 2,458 Withdrawn
- 2,365 Incomplete
- 2,843 Expired
- 22,170 Surrendered
- 6 Denied / 1 Revoked
- **21,820 Active**

Of the 326 Total Pending:

- 149 not yet reviewed
- 171 CCC requested more information
- 6 awaiting third party response
- 0 review complete; awaiting approval



Medical Use Agent Application | November 10, 2022

The total number of MTC agent applications received by status.

| MTC Agent Application | # |
|---------------------------------------|---------------|
| Pending MTC Agent Applications | 48 |
| Pending Laboratory Agent Applications | 0 |
| Incomplete | 54 |
| Revoked | 11 |
| Denied | 31 |
| Surrendered | 12,766 |
| Expired | 2,150 |
| Active | 9,098 |
| Total | 24,158 |

