



Cannabis Control Commission November Monthly Public Meeting

Remote via Teams



Meeting Book - Cannabis Control Commission November Monthly Public Meeting Packet

Table of Contents

Call to Order & Commissioners' Comments/Updates

20230926_MEETING AGENDA 11.09.2023.docx

Minutes

20230728_Mins_Public Meeting_For Commission Consideration.docx

20230810_Mins_Public Meeting_For Commission Consideration.docx

20230828_Memo RE_Executive Session Minutes
Recommendation.docx

20230908_Mins_Public Hearing_For Commission Consideration.docx

20230914_Mins_Public Meeting_For Commission Consideration.docx

20210310_DI_Study_Report.pdf

20230512-ED INFO MEMO-MICROBUSINESS POLICIES REC.docx

20230707-IE MUNICIPAL EQUITY IMPACT STATEMENT.docx

Acting Executive Director and Commission Staff Report

Staff Recommendations on Changes of Ownership

F-COO XS-CATAHOULA CANNABIS LLC-v.2.docx

F-COO XS-HUDSON GROWERS ALLIANCE, LLC-v.2.docx

F-COO XS-MEDMEN BOSTON, LLC-v.2.docx

F-COO XS-MUNRO ASSOCIATES, LLC-v.2.docx

F-COO XS-THEORY WELLNESS, INC.-v.2.docx

F-COO XS-TWISTED GROWERS, LLC-v.2.docx

F-COO XS-WEBBER ROAD OPS, LLC-v.2.docx

Staff Recommendations on Renewals

ME RENEWAL XS-NOVEMBER 2023-v.2.docx

MTC RENEWAL XS-NOVEMBER 2023-v.2.docx

Staff Recommendations on Final Licenses

FL XS-GAN OR, LLC-MD1292-MP282097-v.2.docx

FL XS-NORTHAMPTON LABS-IL281313-v.2.docx

FL XS-NUESTRA, LLC-MR281469-v.2.docx

FL XS-PLUTO CANNABIS CO.-MR284913.v.2.docx

FL XS-RHYTHM OF LIFE CANNABIS, LLC-MC283475-MP282066-
v.2.docx

FL XS-SEASIDE JOINT VENTURES, INC.-MR284549-v.2.docx

Staff Recommendation on Provisional Licenses

PL XS-FINEST TREES, LLC-DOA100163.v.2.docx

PL XS-PORTER SQUARE REMEDIES, LLC-MRN284796.v.2.docx

PL XS-THE STORIES COMPANY WHITMAN, LLC-MRN284846-v.2.docx

Responsible Vendor Training

F-RVT XS-C1 COMPLIANCE GROUP-RVN454102-v.2.docx

Commission Discussion & Votes

DEI AND EMPLOYEE RELATIONS DIRECTOR.docx

Director of Enforcement Training Posting_FINAL_10.20.2023.docx

DRAFT_ First Assistant Enforcement Counsel_11.2023_Final.docx

DRAFT_ Senior Investigator_11.2023_Final.docx

November 2023 Government Affairs Update.docx

Next Meeting Date & Adjournment

20231109 PPT.pptx



November 7, 2023

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 9, 2023
10:00 AM**

Remote via [Microsoft Teams Live*](#)

PUBLIC MEETING AGENDA

- I. Call to Order
- II. Commissioners' Comments & Updates
- III. Acting Chair Discussion & Vote
- IV. Minutes for Approval
- V. Acting Executive Director and Commission Staff Report
- VI. Staff Recommendations on Changes of Ownership
 1. Catahoula Cannabis LLC
 2. Hudson Growers Alliance, LLC
 3. MedMen Boston, LLC
 4. Munro Associates, LLC d/b/a The Vault
 5. Theory Wellness, Inc.
 6. Twisted Growers LLC
 7. Webber Road Ops, LLC D/B/A Pioneer Cannabis Company
- VII. Staff Recommendations on Renewal Licenses
 1. 4bros Inc (#MRR206662)
 2. 617 Therapeutic Health Care, Inc. (#MRR206639)
 3. 617 Therapeutic Health Center, Inc. (#MCR140620)
 4. ACMJ, Inc. (#MCR140556)
 5. Advanced Cultivators, LLC (#MCR140593)
 6. Ashli's Extracts, Inc. (#MPR244053)
 7. Ashli's Farm, Inc. (#MCR140576)
 8. Ashli's, Inc. (#MRR206592)



9. B.O.T Realty, LLC (#MRR206631)
10. Cannabis of Worcester LLC (#MRR206638)
11. Caroline's Cannabis, LLC (#MRR206650)
12. Coastal Cultivars, Inc. (#MPR243909)
13. Cosmopolitan Dispensary, Inc. (#MRR206604)
14. Curaleaf Massachusetts, Inc. (#MPR244050)
15. Curaleaf Massachusetts, Inc. (#MCR140575)
16. Curaleaf North Shore, Inc. (#MPR244049)
17. Curaleaf North Shore, Inc. (#MCR140565)
18. Curaleaf Processing, Inc. (#RER234149)
19. Delivered Inc (#MDR272555)
20. Dris Corporation (#MPR244081)
21. Dris Corporation (#MXR126669)
22. Emerald Grove, Inc. (#MPR244060)
23. Emerald Grove, Inc. (#MCR140590)
24. Evergreen Strategies, LLC. (#MRR206663)
25. Four Daughters Compassionate Care, Inc. (#MRR206627)
26. Four Daughters Compassionate Care, Inc. (#MPR244071)
27. Four Daughters Compassionate Care, Inc. (#MCR140592)
28. Good Chemistry of Mass (#MRR206656)
29. Good Chemistry of Massachusetts, Inc. (#MCR140605)
30. Grassp Ventures LLC (#MDR272554)
31. Haverhill Stem LLC (#MRR206643)
32. Impressed LLC (#MCR140603)
33. Jolly Green Inc (#MCR140604)
34. Lifted Genetics, LLC (#MCR140601)
35. Littleton Apothecary LLC (#MRR206647)
36. M3 Ventures, Inc (#MRR206620)
37. M3 Ventures, Inc. (#MPR244066)
38. M3 Ventures, Inc. (#MCR140582)
39. Mainely Productions LLC (#MCR140606)
40. Mass Greenwoods LLC (#MRR206635)
41. Massachusetts Green Retail, Inc. (#MRR206659)
42. MINUTEMAN FARM, LLC (#MCR140586)
43. NAKED NATURE, LLC (#MBR169314)
44. Neamat, LLC (#MPR244073)

45. New Green LLC (#MRR206648)
46. Nova Farms, LLC (#MPR244075)
47. Patient Centric of Martha's Vineyard, Ltd. (#MRR206634)
48. Potency LLC (#MRR206652)
49. PR MA LLC (#MRR206618)
50. ProVerde Laboratories, Inc. (#ILR267929)
51. Pure Oasis LLC (#MRR206596)
52. RC Retail Amherst LLC (#MRR206612)
53. Resinate, Inc (#MCR140583)
54. Rolling Releaf LLC (#MDR272558)
55. Sanctuary Medicinals, Inc. (#MRR206664)
56. Smokey Leaf (#MRR206655)
57. SOCIAL- J LLC (#DOR5182958)
58. Sparkboro Wellness NAMA Corp. (#MRR206646)
59. Sun Drops, LLC (#MPR244061)
60. SunnyDayz Inc. (#MRR206625)
61. Temescal Wellness of Massachusetts, LLC (#MPR244074)
62. Temescal Wellness of Massachusetts, LLC (#MCR140597)
63. Terpene Journey, LLC (#MRR206645)
64. The Blue Jay Botanicals, Inc. (#MRR206658)
65. The Haven Center, Inc. (#MRR206537)
66. The Haven Center, Inc. (#MRR206536)
67. The Haven Center, Inc. (#MPR244022)
68. The Haven Center, Inc. (#MCR140540)
69. The Haven Center, Inc. (#MRR206485)
70. The Healing Center LLC (#MRR206579)
71. Tree Market Lynn LLC (#MRR206669)
72. Tree Market Taunton LLC (#MRR206668)
73. UC Retail, LLC (#MRR206651)
74. Volcann LLC (#MRR206642)
75. Wellman Farm, Inc. (#MPR244031)
76. 4bros, Inc. (#RMD1325)
77. ACK Natural, LLC (#RMD1627)
78. Alternative Therapies Group, Inc. (#RMD1530)
79. ARL Healthcare, Inc. (#RMD1085)
80. ARL Healthcare, Inc. (#RMD225)

81. Central Ave Compassionate Care, Inc. (#RMD145)
 82. Coastal Healing, Inc. (#RMD1529)
 83. Cresco HHH, LLC (#RMD686)
 84. Cultivate Leicester, Inc. (#RMD485)
 85. Good Chemistry of Massachusetts, Inc. (#RMD3061)
 86. Holistic Industries, Inc. (#RMD685)
 87. HVV Massachusetts, Inc. (#RMD1185)
 88. HVV Massachusetts, Inc. (#RMD1405)
 89. Jushi MA, Inc. (#RMD1285)
 90. Patriot Care Corp. (#RMD727)
 91. Patriot Care Corp. (#RMD265)
 92. Revolutionary Clinics II, Inc. (#RMD925)
 93. Revolutionary Clinics II, Inc. (#RMD1346)
 94. Sanctuary Medicinals, Inc. (#RMD605)
 95. Sanctuary Medicinals, Inc. (#RMD1128)
- VIII. Staff Recommendations on Provisional Licenses
1. Finest Trees, LLC (#DOA100163), Marijuana Courier
 2. Porter Square Remedies, LLC (#MRN284796), Retail
 3. The Stories Company Whitman, LLC (#MRN284846), Retail
- IX. Staff Recommendations on Final Licenses
1. Gan Or, LLC (#MP282097), Product Manufacturing
 2. Gan Or, LLC (#MD1292), Marijuana Delivery Operator
 3. Northampton Labs (#IL281313), Independent Testing Laboratory
 4. Nuestra, LLC (#MR281469), Retail
 5. Pluto Cannabis Co. (#MR284913), Retail
 6. Rhythm of Life, LLC (#MC283475), Cultivation, Tier 1 / Indoor
 7. Rhythm of Life, LLC (#MP282066), Product Manufacturing
 8. Seaside Joint Ventures, Inc. (#MR284549), Retail
- X. Staff Recommendations on Responsible Vendor Training
1. C1 Compliance Group (#RVN454102)
- XI. Commission Discussion and Votes
1. Job Description: Diversity, Equity, Inclusion / Employee Relations Director
 2. Job Description: Director of Enforcement Training
 3. Job Description: First Assistant Enforcement Counsel
 4. Job Description: Senior Investigator
- XII. New Business Not Anticipated at the Time of Posting
- XIII. Next Meeting Date

XIV. Adjournment

*Closed captioning available

CANNABIS CONTROL COMMISSION

July 28, 2023
10:00 AM

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

PUBLIC MEETING MINUTES

Documents:

- [Meeting Packet](#)
- Report on Identifying Disproportionately Impacted Areas by Drug Prohibition in Massachusetts
- Memorandum: I&E's Municipal Equity Impact Statement

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 is being recorded.
- The Chair gave an overview of the agenda.

2) Commissioners' Comments & Updates – 00:01:16

- Commissioner Camargo thanked the Commissioners and staff for their efforts during the previous day's public meeting.
- Commissioner Concepcion recognized the members of both the Host Community Agreement (HCA) and Municipal Equity working groups, as well as individual staff who contributed to the suitability regulations.
- Commissioner Roy thanked Director of Licensing Kyle Potvin (DOL Potvin), Enforcement Counsel Rebecca Lopez (EC Lopez), the HCA Working Group and Commissioners for their hard work and expertise.
- Commissioner Stebbins recognized the working groups, Commission staff and Commissioners for their work on the regulatory drafts.
- The Chair thanked the working groups, Commission staff and Commissioners for their efforts toward the previous day public meeting discussion.



3) Commission Discussion and Votes – 00:04:03

1. Regulatory Review Discussion: Host Community Agreements

- The Chair referenced the recommendation by Commissioner Camargo during the June 27th public meeting to add language to 500.181(1) imposing Minimum Acceptable Equity Standards on municipalities. She suggested that the specific language would function best in a guideline rather than as a mandate. She invited Commissioner Concepcion to comment.
 - Commissioner Concepcion stated that she interpreted the recommendation to be an optional presumption.
 - The Chair proposed that the language be added to the Municipal Equity Memo (MEM) or as part of a guidance document.
 - Commissioner Concepcion asked the Chair to elaborate on her comments that a mandate may create barriers for smaller communities.
 - The Chair responded that not all municipalities can meet the demands of such a mandate. She noted that some are limited by a lack of funding and an inability to attract social equity candidates.
 - Commissioner Concepcion noted that a municipality would not be mandated to adopt the policies.
 - The Chair replied that if the language is not a mandate, it would be better suited as part of a guidance document. She reiterated her support of the intent.
 - Commissioner Camargo expressed that she understood the Chair's rationale. She noted that she has worked to get the language featured in guidance and on the website. She stated that the provision was written with the future of smaller communities in mind. She emphasized that the proposed action items would be optional. She indicated thinking about the “no-towns” and the future.
 - Associate General Counsel Andrew Carter (AGC Carter) noted that guidance is not enforceable in the same way as the regulations. He asked Commissioner Camargo to read the language into the record.
 - The Chair responded that the proposed language would be a suggestion.
 - EC Lopez echoed AGC Carter's statement that municipalities would not be subject to the language of a guidance document as a matter of law. She explained that with a presumptive option, municipalities would be presumed to have satisfied the minimum equity standards if they took one of the proposed steps. She added that if the presumption is part of a guidance document, the municipality would not be entitled to that presumption as a matter of law.
 - Commissioner Roy asked to clarify the legality of mandating that a municipality hire a certain percentage of equity businesses. She noted that the Commission was previously advised against it.



- AGC Carter noted that this is the first draft of the regulations and remarked that the question would need to be contemplated further in the intervening time between the public comment period and the November deadline.
- Commissioner Camargo read the language aloud for the record. She reiterated that the proposal represents a concept and not a mandate.
- The Chair requested that EC Lopez and AGC Carter produce a second draft of the language for review. She stated that she is willing to accept the language as guidance in the form of a regulation.
- Commissioner Concepcion commented that the working group is aware that equity standards is an area that needs to be improved upon with more precise and deliberate guidance. She expressed satisfaction that the entire Commission now has the opportunity to contribute their input and perspective.
- AGC Carter asked Commissioner Camargo where in the draft would she like to see the language inserted.
- Commissioner Camargo suggested 500.181(1) or (2).
- The Chair noted a perceived consensus on the proposed.
- The Chair identified an edit to the language of 500.181(3)(a)(2). She reviewed the edit and asked for questions or comments.
 - Commissioner Stebbins asked if the language encompasses the newly classified contingent of pre-verified social equity businesses that do not hold either Economic Empowerment Priority Applicant (EEPA) or Social Equity Program (SEP) designation.
 - EC Lopez offered suggested language.
 - Commissioner Concepcion raised the question of whether the semantics is redundant since the term “Social Equity Business” includes EEPA/SEP businesses without being averse to statute.
 - Commissioner Camargo asked if Commissioner Concepcion is recommending amending the language throughout the document.
 - Commissioner Concepcion replied affirmatively. She further recommended incorporating the regulatory provision on pre-verification that was previously recommended by EC Lopez.
 - EC Lopez clarified the language as written.
 - Commissioner Stebbins identified conflicting statements around the promotion and encouragement of industry participation in subsections (2) and (2)(a).
 - DOL Potvin concurred. He clarified the policy objective and suggested alternative language to include SEP, EEA and SEB.
 - AGC Carter remarked that he will follow up with DOL Potvin to solidify the language.
- The Chair identified an edit to the language of 500.181(3)(a)(3). She reviewed the edit and asked for questions or comments.



- The Chair identified an edit to the language of 500.181(3)(b). She asked if the language of this section will need to be streamlined to reflect the amended definition of “Social Equity Business”.
 - Commissioner Concepcion responded affirmatively. She emphasized the importance of continuity in the language and intention to include designated and pre-verified SEP’s.
 - EC Lopez asked if the concept of the standard evaluation form was developed with pre-verified individuals who had already submitted an application with the host community.
 - The Chair shared that the working group intended to accommodate individuals at various stages of business formation or licensure. She acknowledged that the legislature uses the term “business” which may not be in alignment with the policy objective.
 - EC Lopez noted that subsection (b) pertains to HCA negotiations, which she perceived to encompass licensed applicants only.
 - The Chair shared that some individuals begin HCA negotiations early-on in the process. She invited DOL Potvin to comment.
 - DOL Potvin stated that HCA negotiations are customarily the purview of licensed applicants but not exclusively so. He provided an example and additional context. He added that presently, an HCA is a precursor to filing an application for initial licensure.
 - The Chair asked EC Lopez for additional comment.
 - EC Lopez proposed alternative language.

2. Regulatory Review Discussion: Municipal Equity

- The Chair identified an edit to the language of 500.181(3)(b)(1). She reviewed the edit and asked for questions or comments.
 - Commissioner Camargo noted that there is a lot of data to be collected that would be valuable to the agency. She cited her experience with grant programs. She raised the question of whether the group considered producing a Commission-issued standardized evaluation form for municipalities. She suggested that it would allow them to make efficient lateral assessments of data from throughout the state. She proposed the creation of a dashboard or open data platform akin to the current licensing tracker once data is collected and a standardized form is established.
 - The Chair expressed agreement with Commissioner Camargo’s ideas. She noted that the Commission currently has a public information data platform. She added that the challenge is in keeping it up to date. She expressed the need to bring consistency and automatic transparency to the Commission’s data collection efforts. She acknowledged that there is not a lot of resources being dedicated to those efforts. She raised the possibility of collaborating with the Massachusetts Municipal Association. She proposed alternative language.



- Commissioner Stebbins expressed concern over a Commission-issued standardized evaluation form. He noted that some communities may want to evaluate applicants according to their own metrics. He proposed developing standardized benchmarks that must be included but otherwise allowing municipalities to continue using their own forms.
- The Chair noted that communities such as Somerville already do a good job with transparency and incorporating equity practices in their evaluation process. She asked Commissioner Camargo if she was suggesting mandating the Commission-issued form or also allowing communities to develop their own evaluation so long as it sets forth certain provisions.
- Commissioner Camargo acknowledged Commissioner Stebbins' concerns. She reiterated that her concept is of a standardized form that would allow the agency to make lateral comparisons of data from across municipalities. She added that she is open to suggestions and in particular to the ability for municipalities to add on to the form.
- Commissioner Concepcion explained that the provision was developed around feedback by a multitude of licensees. She noted that it is common for municipalities to employ some manner of scoring mechanism in their evaluation of HCA applications. She added that the working group's intention is to ensure that equity is at the forefront of the processes that are already in place. She expressed support of a Commission-issued standardized form in an effort to streamline data collection and intake efforts. She recommended that it should be open-ended so that municipalities may insert their own provisions.
- Commissioner Camargo added that one potential advantage of a standardized form is that it would enable the Commission to launch an equity dashboard more efficiently.
- The Chair noted that the topic raises practical considerations that may be best discussed in further detail after the public comment period. She reiterated her support of the idea. She expressed the need to determine how the concept will function in practice. She recommended inserting language to serve as notice that a standardized evaluation form concept is under review. She further suggested seeking out feedback on the matter from municipalities and related staff. She offered suggested language.
- Commissioner Camargo clarified that the evaluation form and data collection protocol are separate concepts. She raised the question of how either concept might be limited by the scope of the regulations.
- AGC Carter suggested that both concepts fall within the scope of the regulations. He further suggested that the meeting itself was providing sufficient notice to the public. He added that incorporating the Chair's recommended language would be a good starting point for further contemplation, if needed.
- The Chair reiterated that she would first like to better understand the logistics of maintaining the Commission's databases. She asked Commissioner Camargo to clarify the specific data she hopes to capture with the proposed platform.



- Commissioner Camargo responded that it is essentially the same data currently being collected from the delivery accessibility period. She quoted 935 CMR 500.050 as an example of data collection protocol already in effect by the Commission.
- The Chair noted a perceived consensus on the proposed language around a standardized evaluation form. She invited AGC Carter to comment on possible ways to insert language providing notice that the Commission is reviewing possible ways to prioritize equity in its data collection practices.
- Commissioner Camargo expressed that she would like input from the Municipal Equity Group and staff about the feasibility of the concept. She underscored the prospect of greater transparency. She proposed devising placeholder language and revisiting the matter.
- The Chair concurred.
- DOL Potvin proposed inserting the placeholder language as a second sentence to follow the section regarding the standardized evaluation form. He offered suggested language.
- The Chair explained that some communities have approved a quantity of HCAs that is higher than the number of businesses that will conceivably commence operations. She noted that such communities will likely have questions about implementation. She added that a larger discussion around impact will need to be had.
 - Commissioner Camargo asked how many components of an HCA application will need to be in consideration of equity to equate to twenty-five percent of the evaluation score.
 - The Chair explained how the concept of a numerical scoring system came to be adopted. She stated that municipalities would have autonomy in determining how to satisfy the twenty-five percent requirement.
- Commissioner Camargo asked for clarification around the meaning of “marijuana-related criminal conviction” per romanette (iv).
 - Commissioner Concepcion clarified that the provision is not a matter of suitability. She added that the language originated from the one used in the development of the SEP.
 - EC Lopez indicated that the language of subsection (1) will need to be expanded to accommodate pre-verified social equity businesses.
 - Commissioner Concepcion remarked that her earlier statement about the origins of the language in romanette (iv) was incorrect. She clarified that the language was inspired by that used in the statutory equity requirements in addition to that used in the development of the SEP, which did not require drug convictions to be marijuana related. She raised the question of whether the language of romanette (iv) should be similarly less restrictive in that regard.
 - Commissioner Camargo expressed that the language may be best limited to marijuana convictions.
 - Commissioner Concepcion proposed leaving the language intact pending further contemplation.

- Commissioner Roy noted that the Commission’s Report on Identifying Disproportionately Impacted Areas by Drug Prohibition in Massachusetts includes only marijuana convictions and offenses.
- Commissioner Concepcion suggested that the provision be amended to include offenses.
- The Chair noted a perceived consensus on amending the language to include marijuana-related offenses. She invited AGC Carter to comment.
- AGC Carter asked for clarification if the word “offenses” in this context means arrests and convictions.
- Commissioner Concepcion responded affirmatively. She noted that arrests do not always result in a court summons.
- Commissioner Roy asked Commissioner Concepcion to clarify whether the language precludes individuals with expunged or sealed records.
- Commissioner Concepcion noted that expungement eliminates any record of an offense, thereby necessitating an individual to retain their own records to not be precluded. She suggested that it may be a guidance matter.
- The Chair identified an edit to the language of 500.181(3)(b)(2). She reviewed the edit and asked for questions or comments.
 - EC Lopez asked to clarify if the language will need to be expanded to accommodate pre-verified social equity businesses.
 - The Chair replied affirmatively.
 - Commissioner Roy asked if the language represents a presumption or a mandate.
 - The Chair indicated that it is a mandate.
 - Commissioner Roy reiterated her concerns about the legality of mandating percentages.
 - AGC Carter explained that Chapter 180 has granted the Commission the impose mandates related to licensing. He noted the distinction between mandates in a licensing context and concerns around hiring practices with regard to 500.181(1).
- The Chair identified an edit to the language of 500.181(3)(c). She reviewed the edit and asked for questions or comments.
- The Chair identified an edit to the language of 500.181(3)(d). She noted that the enforcement framework is still in development despite the July 1st compliance deadline for municipalities. She expressed concern over the possibility of having to field complaints before that framework is in place. She conveyed that they are still in the process of determining the best approach to enforcement.
 - Commissioner Concepcion stated that the Department of Revenue is not precluded from assessing fines for non-compliance before the Commission’s May 1, 2025, deadline.
- The Chair identified an edit to the language of 500.181(4)(a). She reviewed the edit and asked for questions or comments.

- EC Lopez proposed additional language to encompass pre-verified applicants.
- The Chair identified an edit to the language of 500.181(4)(b-d). She reviewed the edit and asked for questions or comments.

The Chair moved to take a ten-minute recess.

- 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 – Yes
- The Commission unanimously approved taking a ten-minute recess, returning at 12:05 PM (02:00:39)
- The Chair identified an edit to the language of 500.181(5). She reviewed the edit and asked for questions or comments.
 - Commissioner Stebbins expressed concern about the language regarding minimum contributions to the Cannabis Social Equity Trust Fund (CSETF).
 - The Chair disclosed that a memo by the Enforcement and Licensing departments containing insight on the matter did not reach the working group members in enough time before the July 13th public meeting to allow for review and contemplation.
 - EC Lopez asked for a legal opinion on whether the memo in question will become part of the public record if referenced and if it is covered by the deliberative process exemption.
 - The Chair stated that she is willing to allow the memo to become part of the public record. She asked if that is within the scope of her authority.
 - AGC Carter noted any document relied on by the Commissioners in the course of a public meeting should be included in the public meeting materials. He suggested that any confidential, privileged, or unfinished document should not be referenced. He deferred to the Commissioners.
 - The Chair explained that the memo indicated the working group may have misinterpreted important statutory language about positive impact to communities. She added that she consulted with legislators involved in drafting the statute who were likewise of the opinion that a 3% minimum fee is incongruent with the policy objective. She acknowledged that a single legislator cannot declare legislative intent. She noted that she is ultimately not in support of the provision. She proposed leaving the language as written, pending further contemplation.

- EC Lopez asserted that the plain language of Mass. General Laws c. 94G § 10 is clear in its intent with regard to PIPs. She quoted the statute. She noted the distinction between promoting equity at the individual level versus the community level as separate policy objectives. She added that the agency has always recognized this distinction, as evidenced by the development of the SEP, which impacts individuals and PIPs, which impact communities. She stated that the language of subsection (5)(a) was proposed to better reflect the statutory mandate and initiate a conversation around how the Commission can do more to serve disproportionately impacted areas. She added that the same applies to the criterion in subsection (5)(b)(1).
- The Chair expressed the need for a more in-depth policy discussion with stakeholders.
- Commissioner Stebbins expressed concern that the cost of paying the 3% fee could be passed down to licensees and the funds inadvertently funneled into the CSETF.
- The Chair underscored the importance of deadlines. She expressed her appreciation of the Enforcement and Licensing teams for their alternate perspective on the matter.
- Commissioner Roy posed the question of whether imposing the fee guarantees that DIAs will be positively impacted.
- EC Lopez reiterated that the language is not intended to be a policy recommendation. She encouraged further legal analysis and review.
- Commissioner Roy asked Director of Government Affairs and Policy Matt Giancola (DGAP Giancola) about the possibility of reaching out to the legislature for clarity and edification on the matter.
- DGAP Giancola responded that the Commission could inquire both formally and informally. He noted that there is an outreach policy in place.
- Commissioner Concepcion discouraged seeking legislative intent.
- EC Lopez read a statement from case law that she stated has informed position on seeking legislative intent.
- Commissioner Concepcion noted a lot of discourse around funding the CSETF. She added that the provision is in line with the Commission's efforts to ensure that the Fund is successful.
- Commissioner Camargo raised the question of whether the overarching concern is about the 3% fee or the policy as a concept. She echoed Commissioner Stebbins' concern about cost being passed down to licensees. She quoted literature from the Office of Housing and Economic Development indicating that municipalities will also be able to benefit from the Fund. She reflected on the Commission's obligation to those impacted by the War on Drugs.
- The Chair expressed concern over time constraints. She asked AGC Carter what their options are for meeting the filing deadline if they do not get

- through the draft and have to call a meeting the following week.
- AGC Carter acknowledged the time constraint. He offered a brief description of the labor-intensive filing process. He recommended getting through as much as possible that day. He deferred to the Board.
 - Commissioner Camargo recommended keeping the language intact with the understanding that it will be revisited as a policy discussion.
 - The Chair noted a perceived consensus on keeping the language intact, pending further contemplation.
- The Chair identified an edit to the language of 500.300. She reviewed the edit and asked for questions or comments.
 - The Chair identified an edit to the language of 500.310. She reviewed the edit and asked for questions or comments.
 - The Chair identified an edit to the language of 500.360(3)(b)(8). She observed a potentially erroneous word choice.
 - AGC Carter noted that he will revisit the language and make the appropriate amendment if there is a consensus of the body.
 - The Chair identified an edit to the language of 500.310(5). She reviewed the edit and asked for questions or comments.
 - The Chair identified an edit to the language of 500.310(7). She reviewed the edit and asked for questions or comments.

4) New Business Not Anticipated at the Time of Posting – 02:36:54

- The Chair explained that she is taking the agenda out of order to reference new business not anticipated at the time of posting. She commented that before the May 23rd public meeting, the ED notified her of his intention to resign at the end of the year. She mentioned that she requested the ED to refrain from making any announcements on that day, as the Commission was in the process of hiring a Chief People Officer (CPO) and General Counsel (GC). She commented that before the meeting on July 27, 2023, the ED informed her he would be making the announcement that day, although he ultimately did not, and that he now intended to take parental leave beginning July 31st. She further discussed his potential departure in light of the regulatory deadline. She opined that the Commission is in a precarious state due to his potential absence and clarified that this information is being discussed to preserve the operational integrity of the agency throughout the regulatory process. She added that she would like to meet with the Commissioners to discuss the matter.
 - Commissioner Concepcion stated that she would like to revisit the matter at a later time, given the imminent filing deadline. She added that she would also like to allow the ED the opportunity to discuss the matter. She underscored the importance of completing the task at hand.
 - The Chair explained that when she learned the ED's leave would begin, she had to consider what the impact would be to the regulatory proceedings.
 - Commissioner Camargo noted her shock at the Chair's disclosure. She added that she would like to redirect the conversation back to the draft.

- Commissioner Stebbins remarked that he did not understand how the Chair’s comments fit into their consideration of the agenda and the work before them. He likewise expressed a desire to return to the regulatory discussion.
- The Chair reiterated that the announcement was made to protect the functioning of the Commission. She acknowledged the delicate nature of the matter. She added that she wanted to make the announcement then so that there would be time to provide public notice of a follow-up meeting because the Open Meeting Law precludes the Commissioners from conversing on policy matters outside of an open session.
- Commissioner Camargo clarified that her choice of the word “shock” was intended to reflect her surprise at the announcement.

5) Commissioner Discussion & Votes (continued) – 02:51:07

3. Regulatory Review Discussion: Suitability

- The Chair asked Commissioners Camargo and Concepcion how they would prefer to navigate the review and discussion of the suitability section.
 - Commissioner Concepcion replied that she would like to begin with the PowerPoint presentation because it describes and explains the amendments throughout.
 - The Chair responded affirmatively.
- Commissioner Concepcion thanked DGAP Giancola for his efforts to assemble the presentation. She offered an outline of the overall goals of the presentation and policy conversation. She shared that she hopes it will lead to more CORI-friendly (Criminal Offender Record Information) employment in the cannabis industry. She added that it is the fastest growing industry in the state. She explained that the changes have been mandated by law and are already in effect. She noted the timeliness of the discussion.
- Commissioner Camargo reflected on the importance of the regulations to the people and communities impacted by the War on Drugs. She raised the question of how the Commission can combat the lingering stigma and misconception around cannabis.
- EC Lopez gave an overview of Bill S.3096 and its impact and the Commission’s response. She discussed the suitability process including how the process is initiated, how suitability is determined, and potential outcomes.
- Commissioner Roy asked to clarify whether the new suitability standards are extended to operators and licensees, or just registered agents.
 - EC Lopez clarified that the changes are applicable to individuals seeking employment at marijuana establishments.
- Commissioner Camargo presented information on registered agent demographics.
- Commissioner Concepcion discussed the safeguards that are in place at the federal, state and Commission level to ensure public safety. She expressed her gratitude to Senator William Brownsberger, the Senate and the House of Representatives for unanimously passing the law. She reflected on her efforts as an advocate for the changes and noted the abundance of research in support of them. She read a quote from research conducted by the UMass Donahue Institute. She discussed the



- correlation between gainful employment and recidivism. She outlined the benefits of the new suitability standards for employers. She invited Commissioner Camargo to comment.
- Commissioner Camargo thanked Commissioner Concepcion for her remarks and hard work in helping to bring suitability reform to fruition. She suggested there may be a need to create a guidance document for the new suitability tables.
 - The Chair thanked Commissioners Camargo and Concepcion. She echoed the need for guidance on the suitability tables. She suggested devising a way of ensuring licensees are fluent in the suitability standards and can make an accurate assessment of their own suitability from the outset. She designated Commissioner Roy as Acting Chair for the remainder of the meeting. She offered her apologies for having to leave the meeting early and noted that she will be listening in telephonically.
 - The Acting Chair identified an edit to the language of 500.802(Table B). She shared that she has received many calls from people with concerns about the relaxed suitability standards. She acknowledged that there was a petition against the Bill in circulation.
 - Commissioner Concepcion noted also receiving input from concerned individuals. She identified some information from a petition that was inaccurate and addressed the inaccuracies for the record. She encouraged cannabis industry workers to approach the Commission directly with concerns.
 - Commissioner Camargo echoed Commissioner Concepcion’s remarks to industry employees.
 - The Acting Chair asked if the Commission has safeguards in place if it deems an Agent a public health concern.
 - EC Lopez noted that every table contains a provision intended to capture and assess suitability for public health, safety or welfare reasons. She added that the provision applies to owners and registered agents alike.
 - The Acting Chair asked EC Lopez to detail the process of becoming a registered agent.
 - EC Lopez deferred to DOL Potvin.
 - DOL Potvin provided an overview of the application process.
 - The Acting Chair asked DOL Potvin to confirm that the existing suitability table will still apply for licensees and owners.
 - DOL Potvin confirmed that Table A was not impacted by Chapter 180.
 - The Acting Chair asked if employers were always responsible for conducting background checks on registered agents or if that is a new development.
 - DOL Potvin replied that the practice has been in place and was adapted from the medical marijuana model utilized by the Department of Health.
 - EC Lopez clarified that the term “Marijuana Establishment Agent” is defined by the Commission to mean owners while “Registered Agent” refers to employees of Marijuana Establishments.

- DOL Potvin continued with this overview of the registered agent application process.
- The Acting Chair asked DOL Potvin to confirm that the Commission has the authority to disqualify a registered agent applicant if it deems that the applicant is a threat to public health.
- DOL Potvin noted that on Table B under 501.802, there is a “catch-all” provision in place that allows the Commission to disqualify a candidate if their prior acts pose a public health concern and can be construed in connection with their ability to operate within a marijuana establishment or MTC.
- AGC Carter added that the “catch-all” provision has been present in the tables since their creation.
- The Acting Chair identified an edit to the language of 500.802(Table C). She reviewed the edit and asked for questions or comments.
- The Acting Chair identified an edit to the language of 500.802(Table D). She reviewed the edit and asked for questions or comments.
- The Acting Chair identified an edit to the language of 500.803. She reviewed the edit and asked for questions or comments.
- Commissioner Stebbins thanked the Acting Chair for facilitating the discussion. He recognized DOL Potvin for his thorough explanation of the suitability tables and registered agent hiring process. He thanked Commissioners Camargo and Concepcion for their diligent work on the matter. He echoed earlier sentiments around the need for a guidance document to help prevent individuals from self-excluding. He likewise encouraged individuals who are interested in employment in the cannabis industry to reach out with any questions.
- Commissioner Camargo thanked Commissioner Stebbins for his insight, Acting Chair for her thoughtful questions and Commissioner Concepcion for her dedication to suitability reform.
- The Acting Chair likewise thanked Commissioner Concepcion for her tireless efforts to advance the suitability discussion. She reflected on the impacts of incarceration, the cycle of recidivism, and over 10 years of service as part of the leadership team of the Worcester County Sheriff's Office. She reiterated the need for suitability guidance. She thanked DOL Potvin, AGC Carter and EC Lopez for their contributions. She likewise thanked the working groups for their efforts.
- Commissioner Stebbins clarified that all of the approved amendments will be reflected in the medical use of marijuana regulations as well.
- The Acting Chair asked AGC Carter to provide language for the vote.
- AGC Carter provided the language for the vote.
- Commissioner Concepcion moved to approve to direct staff to take all necessary steps to finalize and file the draft of 935 CMR 500 and to make all corresponding changes to 935 CMR 501 and take all necessary steps to file that series as well.
- Commissioner Camargo seconded the motion.
- The Acting Chair took a roll call vote:



- Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved to direct staff to take all the necessary steps to finalize and file the draft of 935 CMR 500 and to make all corresponding changes to 935 CMR 501 and take all necessary steps to file that series as well, by a vote of four in favor and none opposed.
- DOL Potvin noted that in consideration of the Chair’s absence, it would be prudent to seek counsel’s advice to find a more suitable approach to accurately represent the vote.
- AGC Carter agreed with DOL Potvin’s comment to find another solution to reflect the vote more accurately in light of the Chair’s absence. He also proposed including the word “approve” in the motion language. He expressed that if the Commission is willing to reconsider the previous vote, the motion language can be amended accordingly. He also noted that in order to proceed with the amendment, a motion to reconsider would need to be made first.
- Commissioner Camargo moved to approve reconsideration of the previous vote. Commissioner Concepcion seconded the motion.
- The Acting Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Absent
- The Commission approved to reconsider the previous vote, by a vote of four in favor and none opposed.
- AGC Carter provided the language for the 935 CMR 500 vote.
- Commissioner Concepcion moved to approve the draft regulations 935 CMR 500 and to direct staff to take all steps necessary to finalize and file the regulations with the Secretary of the Commonwealth.
- Commissioner Stebbins seconded the motion.
- The Acting Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Commissioner O’Brien – Absent
- The Commission approved the draft regulations 935 CMR 500 and to direct staff to take all steps necessary to finalize and file the regulations with the Secretary of the Commonwealth, by a vote of four in favor and none opposed.

- AGC Carter provided the language for the 935 CMR 501 vote.
- Commissioner Camargo moved to approve to incorporate all corresponding changes from 935 CMR 500 into 935 CMR 501 and approve the draft and also to finalize and take all necessary steps to promulgate and file with the Secretary of the Commonwealth.
- Commissioner Concepcion seconded the motion.
- The Acting Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Commissioner O’Brien – Absent
- The Commission approved to incorporate all corresponding changes from 935 CMR 500 into 935 CMR 501 and approve the draft and also to finalize and take all necessary steps to promulgate and file with the Secretary of the Commonwealth, by a vote of four in favor and none opposed.
- Commissioner Camargo thanked the working groups and support staff for their efforts in developing the regulatory drafts. She apologized to the Commission staff for the conversation that took place regarding the ED.
- Commissioner Concepcion thanked the Acting Chair for her pointed insights during the suitability conversation.
- Commissioner Stebbins stated that he is honored and humbled to work alongside his colleagues and staff at the Commission. He reflected on the nature of public service work.
- The Acting Chair expressed her gratitude to her colleagues and the staff. She noted that she looks forward to the public hearing and comment period and underscored its importance to the regulatory process. She stated she will reserve all comments related to the other matter for executive session.
- Commissioner Camargo thanked Commissioner Roy for standing in as the Acting Chair. She recognized the Acting Chair for her efforts to facilitate the regulatory discussions.

6) Next Meeting Date– 04:05:56

- The next meeting would be on August 10, 2023.

7) Adjournment – 04:14:57

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



- Commissioner Camargo – Yes
- Commissioner Concepcion – Yes
- Commissioner Roy – Yes
- Commissioner Stebbins – Yes
- The Commission approved the motion to adjourn, by a vote of four in favor and none opposed.

CANNABIS CONTROL COMMISSION

August 10, 2023
10:00 AM

In-Person with Remote Access via [Microsoft Teams Live*](#)

PUBLIC MEETING MINUTES

Documents:

- Application Materials associated with:
 - Staff Recommendations on Changes of Ownership
 - Kaycha MA, LLC
 - Kapnos, Inc.
 - Staff Recommendations on Provisional Licenses
 - Cannabis Healing, LLC (#MRN283634), Retail
 - Euphorium, LLC (#MCN283845), Cultivation, Tier 1 / Indoor
 - Euphorium, LLC (#MPN282263), Product Manufacturing
 - Euphorium, LLC (#MRN284560), Retail
 - FFD Enterprises MA, Inc (#MRN284920), Retail
 - FitzCanna, Inc (#MPN282212), Product Manufacturing
 - FitzCanna, Inc (#MXN281413), Transporter with Other ME License
 - FreeMarketMA, LLC (#MCN283866), Cultivation, Tier 2 / Outdoor
 - Hoop City Ventures, LLC (#MR284806), Retail
 - Mass Tree Holdings, LLC (#MPN282265), Product Manufacturing
 - On Root, LLC (#DOA100179), Marijuana Courier
 - On Root, LLC (#MDA1301), Marijuana Delivery Operator
 - Stone's Throw Cannabis (#MRN284843), Retail
 - Staff Recommendations on Final Licenses
 - Buudda Brothers, LLC (#MC281939), Cultivation, Tier 1 / Product Manufacturing
 - Buudda Brothers, LLC (#MP281585), Product Manufacturing
 - Buudda Brothers, LLC (#MR282225), Retail
 - Comm Ave Canna, Inc (#MR282314), Retail
 - Holistic Industries, Inc d/b/a Liberty Cannabis (#MR281787), Retail
 - J-B.A.M., Inc (#MP282172), Product Manufacturing
 - KG Collective Brockton, LLC (#MR281374), Retail
 - SQ Causeway, (#DO100127), Marijuana Courier
 - ToroVerde (Massachusetts), Inc d/b/a Happy Feelings (#MR282320), Retail
 - ToroVerde (Massachusetts), Inc d/b/a Happy Feelings (#MR282601),



Retail

- JOLO Can, LLC d/b/a Harbor House Collective (#RMD3737)
- Staff Recommendations on Renewal Licenses
 - 202 Trading Company, Inc. d/b/a Bud Barn (#MRR206517)
 - Ahava, LLC (#MCR140539)
 - Ahava, LLC (#MPR244036)
 - Analytics Labs, LLC. (#ILR267919)
 - Apotho Therapeutics Plainville, LLC (#MRR206562)
 - Atlas Marketplace & Delivery, LLC d/b/a Plymouth Armor Group (#MTR263109)
 - Baileys' Buds, LLC (#MBR169315)
 - Berkshire Kind Inc. (#MCR140528)
 - BeWell Organic Medicine, Inc. (#MCR140542)
 - CNA Stores, Inc. (#MCR140529)
 - CNA Stores, Inc. (#MPR244016)
 - Coastal Solutions (#MTR263110)
 - Commonwealth Alternative Care, Inc. (#MRR206524)
 - Commonwealth Alternative Care, Inc. (#MPR244007)
 - Commonwealth Alternative Care, Inc. (#MRR206523)
 - Commonwealth Alternative Care, Inc. (#MCR140532)
 - DayDreamz Estates LLC (#MCR140481)
 - DMS Trinity, LLC (#MRR206542)
 - Evergreen Industries LLC (#MCR140555)
 - Four Score Holdings LLC (#MPR243902)
 - Four Score Holdings LLC (#MCR140369)
 - Frozen 4 Corporation (#MCR140536)
 - G7 Lab LLC (#ILR267923)
 - Gan Or LLC (#MPR244037)
 - Green Gold Group Inc (#MCR140491)
 - Green Valley Analytics LLC (#ILR267924)
 - Greenbridge Technologies, LLC (#MPR244032)
 - Greenbridge Technologies, LLC (#MCR140547)
 - Hennep Cultivation LLC (#MPR243989)
 - Hennep Cultivation LLC (#MCR140501)
 - Hidden Hemlock, LLC (#MBR169313)
 - HumboldtEast, LLC (#MPR244018)
 - HVV Massachusetts, Inc (#MPR244027)
 - N.S.A., Inc. (#MRR206560)
 - INDICA LLC (#MRR206434)
 - JAMACO, LLC (#MCR140468)
 - Life Essence, Inc. (#MCR140520)
 - Life Essence, Inc. (#MRR206449)
 - Major Bloom, LLC (#MRR206338)
 - Mayflower Medicinals, Inc. (#MRR206486)
 - Mayflower Medicinals, Inc. (#MRR206487)
 - Mederi Inc. (#MCR140510)



- Noble Manna Inc. (#MRR206460)
- Nova Farms LLC (#MRR206521)
- NS AJO Holdings Inc. (#MRR206550)
- Patriot Care Corp (#MRR206567)
- Patriot Care Corp (#MRR206543)
- Patriot Care Corp (#MPR244023)
- Patriot Care Corp (#MCR140538)
- Pure Industries, Inc. (#MPR244020)
- Pure Lowell, Inc. (#MRR206526)
- Releaf Cultivation L.L.C (#MCR140525)
- Rhythm of Life Cannabis LLC (#MPR244028)
- Rhythm of Life Cannabis LLC (#MCR140551)
- Root 2 Naturals, LLC (#MBR169316)
- Salisbury Cultivation and Production Manufacturing, LLC (#MPR244010)
- Salisbury Cultivation and Production Manufacturing, LLC (#MCR140519)
- Silver Therapeutics of Palmer, Inc. (#MRR206558)
- Southcoast Apothecary, LLC (#MRR206533)
- STANDISH GREEN GROUP, LLC (#MPR244035)
- Temescal Wellness of Massachusetts, LLC (#MRR206549)
- Temescal Wellness of Massachusetts, LLC (#MRR206548)
- The Green Lady Dispensary II, Inc. (#MRR206553)
- Theory Wellness Inc (#MRR206518)
- Top Shelf Cannaseurs LLC (#MCR140533)
- True East Leaf LLC (#MRR206503)
- Uma Flowers Lunenburg LLC (#MRR206528)
- Union Twist, Inc. (#MRR206530)
- Union Twist, Inc. (#MRR206529)
- Witch City Gardens LLC (#MRR206541)
- Alternative Therapies Group, Inc. (#RMD065)
- Bountiful Farms, Inc. (#RMD1485)
- Four Daughters Compassionate Care, Inc. dba Zen Leaf (#RMD1691)
- Garden Remedies, Inc. (#RMD205)
- Mayflower Medicinals, Inc. (#RMD425)
- Sanctuary Medicinals, Inc. – Danvers (#RMD1127)
- Staff Recommendations on Responsible Vendor Training, Delivery Core Curriculum
 - ACTA LLC (#DCCN462218)
 - Bartucca Consulting LLC (#DCCN462220)
 - Cannabis Trainers (#DCCN462217)
 - Ellen Brown (#DCCN462213)
 - Grass Ceiling, LLC (#DCCN462225)
 - Green CulturED (#DCCN462233)
 - Kristi Talagan (#DCCN462216)
- Staff Recommendations on Responsible Vendor Training Renewals
 - Mary Buller (#RVR453134)



- Willow Street Legal, LLC (#RVR453135)
- [Meeting Packet](#)
- E-mail from Edward DeSousa regarding Microbusinesses
- Enforcement Memo on Microbusinesses

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) Commissioners' Comments and Updates – 00:01:26

- The Chair read a prepared statement regarding her disclosure about the Executive Director (ED) during the July 28 public meeting. She reflected on her vision for expanding the Commission's equity initiatives. She thanked the Commissioners for their individual work in key areas.
- Commissioner Camargo expressed the importance of order and self-governance in the course of public meeting proceedings. She thanked Commission staff at large for their tireless efforts. She encouraged media outlets to reach out to the Communications department with inquiries to ensure accurate reporting.
- Commissioner Concepcion opined that the Chair's remarks at the previous meeting overshadowed the significance of unveiling the new suitability standards. She recognized Associate General Counsel Andrew Carter (AGC Carter), Enforcement Counsel Rebecca Lopez (EC Lopez), and Director of Licensing Kyle Potvin (DOL Potvin) for their contributions on the July 28 public meeting. She recognized former Chairman Steven Hoffman and former Commissioners Doyle, Flanagan, Title and McBride for their work to initiate Host Community Agreement (HCA) reform. She reflected on the process of bringing the proposed regulations to fruition.
- Commissioner Roy thanked the group for the candor of their remarks. She thanked Commissioner Concepcion for her comments about the work that went into the regulatory writing process. She shared that she recently participated in a roundtable discussion on HCAs during which time licensees were able to vocalize their concerns. She thanked Caroline's Cannabis and David O'Brien for hosting the discussion. She noted that she is looking forward to the regulatory public hearing in September. She offered a hiring update on the Chief People Officer and Deputy General Counsel positions. She thanked Grace O'Day and Kate Flanagan for their continued efforts.
- Commissioner Stebbins echoed Commissioner Concepcion's sentiments about the regulations as a milestone for the agency. He discussed the current state of the



cannabis industry in Massachusetts, which has much more competitive pressures. He likewise thanked AGC Carter, EC Lopez, and DOL Potvin for their contributions to the regulatory discussions at the July 27-28 public meetings. He thanked those involved with facilitating the meetings. He shared that he had the opportunity to speak at the recent Let's Talk Weed event in Cambridge. and thanked those staff who were in attendance.

3) Minutes for Approval – 00:26:53

- May 11, 2023
 - The Acting Chair asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
 - Commissioner Roy moved to approve the minutes for the May 11, 2023, Commission public meeting.
 - 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 – Yes
- The Commission unanimously approved the minutes for the May 11, 2023, Commission public meeting.
- May 22, 2023
 - The Acting Chair asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
 - Commissioner Roy moved to approve the minutes for the May 22, 2023, 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 – Yes
- The Commission unanimously approved the minutes for the May 22, 2023, Commission public meeting.

4) Staff Recommendations on Changes of Ownership – 00:28:44

1. Kaycha MA, LLC

- Licensing Manager Tsuko Defoe (Licensing Manager Defoe) presented the Staff Recommendation for Change of Ownership.
- Commissioner Camargo moved to approve the Change of Ownership.



- 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 the Change of Ownership.

2. Kapnos, Inc.

- 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.
- 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 the Change of Ownership.

5) Staff Recommendations on Provisional Licenses – 00:30:37

1. Cannabis Healing, LLC (#MRN283634), Retail

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- Commissioner Roy 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 – Yes
- The Commission unanimously approved the Provisional License.

2. Euphorium, LLC (#MCN283845), Cultivation, Tier 1 / Indoor

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- 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 indoor Marijuana Cultivators as it relates to quality control samples in accordance with 935 CMR 500.120(12) and 935 CMR 500.120(14).
- Commissioner Stebbins requested a condition.
 - Proposed Condition: Prior to Final Application for Licensure, consider review and update diversity hiring goals in Diversity Plan based on statistics of host community and region, in accordance with 935 Code Mass. Regs. § 500.101(1)(c)8k and provide any updates to CCC Licensing Division.
- The Chair asked to clarify the rationale of the condition.
 - Commissioner Stebbins responded that he would like to encourage the applicant to reassess the feasibility of their plan.
- Commissioner Camargo moved to approve the Provisional License, subject to the conditions requested by Commissioner Roy and Commissioner 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 – Yes
- The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioner Roy and Commissioner Stebbins.

3. Euphorium, LLC (#MPN282263), Product Manufacturing

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- 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, in accordance with 935 CMR 500.135(k) and 935 CMR 500.139.
- Commissioner Stebbins requested a condition.
 - Proposed Condition: Proposed Condition: Prior to Final Application for Licensure, consider review and update diversity hiring goals in Diversity Plan based on statistics of host community and region, in accordance with 935 CMR 500.101(1)(c)8k and provide any updates to CCC Licensing Division.
- Commissioner Roy moved to approve the Provisional License, subject to the conditions requested by Commissioner Roy and Commissioner Stebbins.
- 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 the Provisional License, subject to the conditions requested by Commissioner Roy and Commissioner Stebbins.

4. Euphorium, LLC (#MRN284560), Retail

- Licensing Manager Defoe presented the Staff Recommendation for the 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 500.140(6) please include the phone number for the Massachusetts Substance Use Helpline on your consumer education.
- Commissioner Stebbins requested a condition.
 - Proposed Condition: Prior to Final Application for Licensure, consider review and update diversity hiring goals in Diversity Plan based on statistics of host community and region, in accordance with 935 CMR 500.101(1)(c)8k and provide any updates to CCC Licensing Division.
- Commissioner Camargo moved to approve the Provisional License, subject to the conditions requested by Commissioner Roy and Commissioner 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 – Yes
- The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioner Roy and Stebbins.

5. FFD Enterprises MA, Inc. (#MRN284920), Retail

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- The Chair asked for questions or comments.
- Commissioner Stebbins requested a condition.
 - Proposed Condition: Prior to Final Application for Licensure, consider review and update diversity hiring goals in Diversity Plan based on statistics of host community and region and not only based on overall state statistics in accordance with 935 CMR 500.101(1)(c)8k and provide any update to CCC Licensing Division.



- Commissioner Roy moved to approve the Provisional License, subject to the condition requested by Commissioner Stebbins.
- 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 the Provisional License, subject to the condition requested by Commissioner Stebbins.

6. FitzCanna, Inc. (#MPN282212), Product Manufacturing

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- 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, in accordance with 935 CMR 500.135(k) and 935 CMR 500.139.
- 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 – Yes
- The Commission unanimously approved the Provisional License, subject to the condition requested by Commissioner Roy.

7. FitzCanna, Inc. (#MXN281413), Transporter with Other ME License

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- The Chair asked for questions or comments.
- Commissioner Camargo moved to approve the Provisional License.
- 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 the Provisional License.

8. FreeMarketMA, LLC (#MCN283866), Cultivation, Tier 2 / Outdoor

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- 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 outdoor Marijuana Cultivators as it relates to quality control samples, in accordance with 935 CMR 500.120(12) and 935 CMR 500.120(14).
- Commissioner Roy 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 – Yes
- The Commission unanimously approved the Provisional License, subject to the condition requested by Commissioner Roy.

9. Hoop City Ventures, LLC (#MR284806), Retail

- Licensing Manager Defoe presented the Staff Recommendation for the 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 500.140(6) please include the phone number for the Massachusetts Substance Use Helpline on your consumer education.
- Commissioner Stebbins requested a condition.
 - Proposed Condition: Prior to Final Application for Licensure, consider review and update diversity hiring goals in Diversity Plan based on statistics of host community and region and not only based on overall 2010 state statistics in accordance with 935 CMR 500.101(1)(c)8k and provide any update to CCC Licensing Division.
- Commissioner Concepcion moved to approve the Provisional License, subject to the conditions requested by Commissioner Roy and 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 – Yes
- The Commission unanimously approved the Provisional License, subject to the conditions requested by Commissioner Roy and Commissioner Stebbins.

10. Mass Tree Holdings, LLC (#MPN282265), Product Manufacturing

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- The Chair asked for questions or comments.
- Commissioner Camargo moved to approve the Provisional License.
- 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 the Provisional License.

11. On Root, LLC (#DOA100179), Marijuana Courier

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- The Chair asked for questions or comments.
- 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 – Yes

The Commission unanimously approved the Provisional License.

12. On Root, LLC (#MDA1301), Marijuana Delivery Operator

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- The Chair asked for questions or comments.
- 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 – Yes

The Commission unanimously approved the Provisional License.

13. Stone’s Throw Cannabis (#MRN284843), Retail

- Licensing Manager Defoe presented the Staff Recommendation for the 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 500.140(6) please include the phone number for the Massachusetts Substance Use Helpline on your consumer education.
- Commissioner Stebbins requested a condition.
 - Proposed Condition: Prior to Final Application for Licensure, consider review and update diversity hiring goals in Diversity Plan based on statistics of host community and region in accordance with 935 CMR 500.101(1)(c)8k and provide any updates to CCC Licensing Division.
- Commissioner Camargo moved to approve the Provisional License, subject to the conditions requested by Commissioner Roy and Commissioner 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 unanimously approved the Provisional License, subject to the conditions requested by Commissioner Roy and Commissioner Stebbins by a vote of four in favor and one abstention.

6) Staff Recommendations on Final Licenses – 00:53:11

- Adult-Use and Medical-Use Rosters
 - The Chair noted that the Final License roster will consist of items numbered 1 through 11, as identified on the agenda.
 - The Chair asked for questions or comments.
 - Commissioner Camargo moved to approve the roster of Final Licenses.
 - 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 the roster of Final Licenses.

1. Buuddha Brothers, LLC (#MC281939), Cultivation, Tier 1 / Product Manufacturing
2. Buuddha Brothers, LLC (#MP281585), Product Manufacturing
3. Buuddha Brothers, LLC (#MR282225), Retail
4. Comm Ave Canna, Inc (#MR282314), Retail
5. Holistic Industries, Inc d/b/a Liberty Cannabis (#MR281787), Retail
6. J-B.A.M., Inc (#MP282172), Product Manufacturing
7. KG Collective Brockton, LLC (#MR281374), Retail
8. SQ Causeway, (#DO100127), Marijuana Courier
9. ToroVerde (Massachusetts), Inc d/b/a Happy Feelings (#MR282320), Retail
10. ToroVerde (Massachusetts), Inc d/b/a Happy Feelings (#MR282601), Retail
11. JOLO Can, LLC d/b/a Harbor House Collective (#RMD3737)

7) Staff Recommendations on Renewal Licenses – 00:54:00

- Adult-Use and Medical-Use
 - The Chair noted that the Adult-Use and Medical-Use Renewal roster will consist of items numbered 1 through 12, as identified on the agenda.
 - The Chair asked for questions or comments.
 - Commissioner Concepcion moved to approve the roster of Adult-Use and 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 – Yes
 - The Commission unanimously approved the Adult-Use and Medical-Use Renewals.

- Adult-Use
 - The Chair noted that the Adult-Use Renewal roster will consist of items numbered 13 through 16, as identified on the agenda.
 - The Chair asked for questions or comments.
 - Commissioner Concepcion moved to approve the roster of Adult-Use Renewals.
 - Commissioner Roy 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 – Yes
 - The Commission unanimously approved the Adult-Use Renewals by a vote of four in favor and one recused.
- Adult-Use and Medical-Use
 - The Chair noted that the Adult-Use and Medical-Use Renewal roster will consist of items numbered 17 through 41 as identified on the agenda.
 - The Chair asked for questions or comments.
 - Commissioner Camargo moved to approve the roster of Adult-Use and Medical-Use Renewals.
 - Commissioner Concepcion seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Yes
 - The Commission unanimously approved the roster of Adult-Use and Medical-Use Renewals.
- Mederi Inc. (#MCR140510)
 - The Chair noted that the Adult-Use Renewal roster will consist of item numbered 42, as identified on the agenda.
 - The Chair asked for questions or comments.
 - Commissioner Stebbins proposed a condition.
 - Commissioner Stebbins moved to approve the roster of the Adult-Use Renewal, subject to the condition requested by Commissioner Stebbins.
 - Commissioner Roy seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Yes
 - The Commission unanimously approved the roster of the Adult-Use Renewal, subject to the condition requested by Commissioner Stebbins.
- The Chair suggested that the Commission may need to work more closely with early-stage licensees to ensure that they understand the objective of a Positive Impact Plan (PIP) and how it is intended to work in practice.
- Commissioner Stebbins shared that he, Commissioner Camargo and staff updated the guidance around diversity plans with additional information and resources. He added that applicants are producing stronger diversity plans as a result. He proposed revisiting the current PIP guidance.



- The Chair expressed that she would like to look into the development of a working group around updating the current PIP guidance. She added that she would like to gain a better understanding of the established working groups and the scope of their work. She clarified that her statutory imperative as Chair is to delegate and direct the work of the Commissioners.
- Adult-Use and Medical-Use
 - The Chair noted that the Adult-Use and Medical-Use Renewal roster will consist of items numbered 43-76 as identified on the agenda.
 - The Chair asked for questions or comments.
 - Commissioner Roy recognized Southcoast Apothecary, LLC for their dedicated work with the Last Prisoner Project using intervention, advocacy, and awareness campaigns to help secure clemency and record expungement for those incarcerated for cannabis-related drug offenses.
 - Commissioner Concepcion moved to approve the roster of Adult-Use and Medical-Use Renewals.
 - Commissioner Camargo seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Roy – Yes
 - Commissioner Stebbins – Yes
 - Chair O’Brien – Yes
 - The Commission unanimously approved the roster of Adult-Use and Medical-Use Renewals.

1. 202 Trading Company, Inc. d/b/a Bud Barn (#MRR206517)
2. Ahava, LLC (#MCR140539)
3. Ahava, LLC (#MPR244036)
4. Analytics Labs, LLC. (#ILR267919)
5. Apotho Therapeutics Plainville, LLC (#MRR206562)
6. Atlas Marketplace & Delivery, LLC d/b/a Plymouth Armor Group (#MTR263109)
7. Baileys’ Buds, LLC (#MBR169315)
8. Berkshire Kind Inc. (#MCR140528)
9. BeWell Organic Medicine, Inc. (#MCR140542)
10. CNA Stores, Inc. (#MCR140529)
11. CNA Stores, Inc. (#MPR244016)
12. Coastal Solutions (#MTR263110)
13. Commonwealth Alternative Care, Inc. (#MRR206524)
14. Commonwealth Alternative Care, Inc. (#MPR244007)
15. Commonwealth Alternative Care, Inc. (#MRR206523)
16. Commonwealth Alternative Care, Inc. (#MCR140532)
17. DayDreamz Estates LLC (#MCR140481)
18. DMS Trinity, LLC (#MRR206542)
19. Evergreen Industries LLC (#MCR140555)
20. Four Score Holdings LLC (#MPR243902)



21. Four Score Holdings LLC (#MCR140369)
22. Frozen 4 Corporation (#MCR140536)
23. G7 Lab LLC (#ILR267923)
24. Gan Or LLC (#MPR244037)
25. Green Gold Group Inc (#MCR140491)
26. Green Valley Analytics LLC (#ILR267924)
27. Greenbridge Technologies, LLC (#MPR244032)
28. Greenbridge Technologies, LLC (#MCR140547)
29. Hennep Cultivation LLC (#MPR243989)
30. Hennep Cultivation LLC (#MCR140501)
31. Hidden Hemlock, LLC (#MBR169313)
32. HumboldtEast, LLC (#MPR244018)
33. HVV Massachusetts, Inc (#MPR244027)
34. N.S.A., Inc. (#MRR206560)
35. INDICA LLC (#MRR206434)
36. JAMACO, LLC (#MCR140468)
37. Life Essence, Inc. (#MCR140520)
38. Life Essence, Inc. (#MRR206449)
39. Major Bloom, LLC (#MRR206338)
40. Mayflower Medicinals, Inc. (#MRR206486)
41. Mayflower Medicinals, Inc. (#MRR206487)
42. Mederi Inc. (#MCR140510)
 - Commissioner Stebbins requested a condition.
 - Proposed Condition: Within thirty business days of approval of Application for Renewal, contact CCC Licensing Division for an update to clarify goals in Operating Policies and Procedures 2023 Diversity Plan versus 2023 Renewal Final Diversity Plan in accordance with 935 CMR 500.103(4)(b) and 935 CMR 500.101(1)(c)8k.
43. Noble Manna Inc. (#MRR206460)
44. Nova Farms LLC (#MRR206521)
45. NS AJO Holdings Inc. (#MRR206550)
46. Patriot Care Corp (#MRR206567)
47. Patriot Care Corp (#MRR206543)
48. Patriot Care Corp (#MPR244023)
49. Patriot Care Corp (#MCR140538)
50. Pure Industries, Inc. (#MPR244020)
51. Pure Lowell, Inc. (#MRR206526)
52. Releaf Cultivation L.L.C (#MCR140525)
53. Rhythm of Life Cannabis LLC (#MPR244028)
54. Rhythm of Life Cannabis LLC (#MCR140551)
55. Root 2 Naturals, LLC (#MBR169316)
56. Salisbury Cultivation and Production Manufacturing, LLC (#MPR244010)
57. Salisbury Cultivation and Production Manufacturing, LLC (#MCR140519)
58. Silver Therapeutics of Palmer, Inc. (#MRR206558)
59. Southcoast Apothecary, LLC (#MRR206533)



60. STANDISH GREEN GROUP, LLC (#MPR244035)
61. Temescal Wellness of Massachusetts, LLC (#MRR206549)
62. Temescal Wellness of Massachusetts, LLC (#MRR206548)
63. The Green Lady Dispensary II, Inc. (#MRR206553)
64. Theory Wellness Inc (#MRR206518)
65. Top Shelf Cannaseurs LLC (#MCR140533)
66. True East Leaf LLC (#MRR206503)
67. Uma Flowers Lunenburg LLC (#MRR206528)
68. Union Twist, Inc. (#MRR206530)
69. Union Twist, Inc. (#MRR206529)
70. Witch City Gardens LLC (#MRR206541)
71. Alternative Therapies Group, Inc. (#RMD065)
72. Bountiful Farms, Inc. (#RMD1485)
73. Four Daughters Compassionate Care, Inc. dba Zen Leaf (#RMD1691)
74. Garden Remedies, Inc. (#RMD205)
75. Mayflower Medicinals, Inc. (#RMD425)
76. Sanctuary Medicinals, Inc. – Danvers (#RMD1127)

8) Staff Recommendations on Responsible Vendor Training, Delivery Core Curriculum – 01:09:20

1. ACTA, LLA (#DCCN462218)

- Licensing Manager Defoe presented the Staff Recommendation on the Responsible Vendor Training Program, Delivery Core Curriculum.
- The Chair asked for questions or comments.
- Commissioner Roy moved to approve the Responsible Vendor Training Program, Delivery Core Curriculum.
- 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 the Responsible Vendor Training Program, Delivery Core Curriculum.

2. Bartucca Consulting LLC (#DCCN462220)

- Licensing Manager Defoe presented the Staff Recommendation on the Responsible Vendor Training Program, Delivery Core Curriculum.
- The Chair asked for questions or comments.
- Commissioner Concepcion moved to approve the Responsible Vendor Training Program, Delivery Core Curriculum.
- 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 Responsible Vendor Training Program, Delivery Core Curriculum.

3. Cannabis Trainers (#DCCN462217)

- Licensing Manager Defoe presented the Staff Recommendation on the Responsible Vendor Training Program, Delivery Core Curriculum.
- The Chair asked for questions or comments.
- Commissioner Camargo moved to approve the Responsible Vendor Training Program, Delivery Core Curriculum.
- 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 the Responsible Vendor Training Program, Delivery Core Curriculum.

4. Ellen Brown (#DCCN462213)

- Licensing Manager Defoe presented the Staff Recommendation on the Responsible Vendor Training Program, Delivery Core Curriculum.
- The Chair asked for questions or comments.
- Commissioner Roy moved to approve the Responsible Vendor Training Program, Delivery Core Curriculum.
- 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 the Responsible Vendor Training Program, Delivery Core Curriculum.

5. Grass Ceiling, LLC (#DCCN462225)

- Licensing Manager Defoe presented the Staff Recommendation on the Responsible



Vendor Training Program, Delivery Core Curriculum.

- The Chair asked for questions or comments.
- Commissioner Roy moved to approve the Responsible Vendor Training Program, Delivery Core Curriculum.
- 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 the Responsible Vendor Training Program, Delivery Core Curriculum.

6. Green CulturED (#DCCN462233)

- Licensing Manager Defoe presented the Staff Recommendation on the Responsible Vendor Training Program, Delivery Core Curriculum.
- The Chair asked for questions or comments.
- Commissioner Camargo moved to approve the Responsible Vendor Training Program, Delivery Core Curriculum.
- 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 the Responsible Vendor Training Program, Delivery Core Curriculum.

7. Kristi Talagan (#DCCN462216)

- Licensing Manager Defoe presented the Staff Recommendation on the Responsible Vendor Training Program, Delivery Core Curriculum.
- The Chair asked for questions or comments.
- Commissioner Roy moved to approve the Responsible Vendor Training Program, Delivery Core Curriculum.
- 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 the Responsible Vendor Training Program, Delivery Core Curriculum.

9) Staff Recommendations on Responsible Vendor Training Renewals – 01:15:51

1. Mary Buller (#RVR453134)

- Licensing Manager Defoe presented the Staff Recommendation on the Responsible Vendor Training Renewal.
- The Chair asked for questions or comments.
- Commissioner Stebbins moved to approve the Responsible Vendor Training Renewal.
- 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 Responsible Vendor Training Renewal.

2. Willow Street Legal, LLC (#RVR453135)

- Licensing Manager Defoe presented the Staff Recommendation on the Responsible Vendor Training Renewal.
- The Chair asked for questions or comments.
- Commissioner Camargo moved to approve the Responsible Vendor Training Renewal.
- 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 the Responsible Vendor Training Renewal.

Commissioner Camargo moved to take a thirty-minute 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 recess, returning at 11:45 AM (01:39:02)

10) Commission Discussion and Votes – 01:39:16

1. Update on Social Equity Program Cohort Four

- The Chair noted she recently met with a group that runs a job board for individuals seeking work in the cannabis industry in Massachusetts. She added that the Commission will soon enter a contract with a similar group. She added that these developments have prompted her to consider how the Commission interacts with ancillary businesses.
- Chief Communications Officer Cedric Sinclair (CCO Sinclair) noted that the agency's commitment to equity has always included support for entrepreneurship, workforce development, and auxiliary opportunities. He clarified that the contract with Premier Virtual has been executed and will produce employment, contracting and mentorship opportunities within the cannabis arena in the form of an online portal. He added that the project is in the buildout phase with a projected launch at some point during FY24.
 - Commissioner Camargo asked CCO Sinclair if every Social Equity Program (SEP) participant will have access to the portal and for more information about how the portal will function.
 - CCO Sinclair explained that Commissioner Stebbins has been working with the team. The portal is in development and the Communications team will work closely with the Commissioners with regard to features and functionality. He noted that Premier Virtual is contracted with MassHire, which utilizes their specific portal to host virtual statewide job fairs, among other things. He further noted that the platform will allow licensees to meet their PIP requirements and diversity hiring goals more efficiently. He offered an overview of other benefits the portal will provide.
 - Commissioner Roy remarked on the timeliness of the portal. She asked to clarify the timeline of the buildout, whether the portal will be open to all registered agents, and if the Commissioners will receive training on how to use it.
 - CCO Sinclair responded that Commissioners would receive training and also be given access to the forum if desired. He added that training and support will be provided to licensees as well. He explained how the portal could be set up to allow varying levels of access in order to prioritize users with certain designations.
- Commissioner Camargo thanked Commissioner Stebbins for his involvement in getting the project underway. She remarked that many people have expressed to her how helpful such a platform would be.
- Commissioner Stebbins discussed how the partnership with Premier Virtual came about.
- Commissioner Concepcion thanked Commissioner Stebbins for his important work in a multitude of areas.



2. Microbusiness License Type Discussion

- Commissioner Stebbins thanked the Chair for organizing the June policy meeting. He clarified that he is not seeking any change to the current regulatory language. He noted that that microbusiness model is intended to be a way for people to get a foothold in the industry and comes with regulatory limitations around size and growth potential. He indicated that microbusinesses would have to surrender their license to pursue another license. He thanked DOL Potvin and others for their involvement with the creation of a memo outlining the necessary regulatory changes needed to expand on and update the model. He noted the memo presented a redline version. He said that he would like to continue the discussion from June and review the proposed amendments from the memo in preparation of the next regulatory round.
- The Chair stated that she would like to begin convening working groups in anticipation of the next set of regulations in the interest of time and resources. She expressed the desire to invest in a standing regulatory writing group so that the regulations can be adapted on a more ongoing basis.
- Commissioner Camargo concurred. She acknowledged the work Commissioner Roy and Commissioner Stebbins have done around the subject of microbusinesses. She asked how any microbusinesses have reached the commence operations stage, how many of those are SEP or Economic Empowerment Priority Applicant (EEPA) businesses, and how many have a delivery endorsement. She encouraged Commissioner Stebbins to elaborate for the public on why the matter is important and timely.
 - Commissioner Stebbins replied that 11 Microbusinesses have commenced operations and 23 more have been provisionally approved. He explained how limited growth potential impacts microbusinesses in particular EEPA/SEP participants. He added that there are two microbusinesses with SEP designation and one which has a delivery endorsement.
- Commissioner Roy disclosed that there are many microbusiness applicants at varying stages of pre-certification and licensure waiting to move forward in the process. She cited figures. She emphasized the timeliness of the discussion. She raised the question of what can be done during the meeting to advance the matter.
- The Chair underscored the need to devise an actionable, short-term solution. She suggested devising a way for the Social Equity team to help some of the provisionally licensed applicants access the Cannabis Social Equity Trust Fund.
- Commissioner Concepcion asked Commissioner Roy to explain the combination of pre-certification and delivery endorsement.
 - Commissioner Roy explained how a business can hold both designations. She invited DOL Potvin to elaborate.
 - DOL Potvin provided context and clarification around the cited figures. He added that of the 23 provisionally approved microbusinesses, zero hold the EEP designation and five hold the SEP designation.
- Commissioner Camargo asked DOL Potvin to confirm that the ownership of microbusinesses must be comprised of at least 51 percent of Massachusetts residents.
 - DOL Potvin responded that 51 percent of the ownership and executives must

- be Massachusetts residents within 12 months.
- AGC Carter noted that the residency requirement has been the subject of litigation most recently in Maine and New York.
- The Chair asked Commissioner Stebbins to clarify what he is proposing.
 - Commissioner Stebbins expressed that he would like to begin the process of rewriting the regulatory language and would like to establish a consensus in that regard.
 - The Chair again raised the question of how to advance the matter efficiently. She noted that progress has been made to produce suggested amendments to the regulatory language. She opined that waiting until next year to advance the matter will not leave enough time for proper contemplation.
 - Commissioner Stebbins expounded on the financial challenges imposed by the license model. He reiterated that he does not want the discussion to lose momentum.
 - Commissioner Roy invited AGC Carter to comment.
 - AGC Carter acknowledged the hard work of Commissioner Stebbins and the Enforcement team to produce the memo on Microbusinesses. He recommended designating a point person to convene staff to produce a policy proposal or regulatory language.
 - Commissioner Stebbins stated that he is willing to convene staff. He suggested inciting microbusiness owners to provide feedback.
- Commissioner Concepcion asked if Commissioner Stebbins has conducted any manner of impact analysis around the fact that microbusinesses must cease operations in pursuit of a more expansive license-type. She further asked for more information about the businesses he has received feedback from.
 - Commissioner Stebbins replied that he is working with Director of Data Analytics Marianne Sarkis (DDA Sarkis) to track the impact. He noted that he has received feedback primarily from microbusinesses that have commenced operations.
- Commissioner Roy read an e-mail statement on the plight of microbusiness owners by Edward DeSousa of RiverRun Gardens, which is the second microbusiness in the state.
- Commissioner Stebbins reiterated that he would like to establish a consensus on rewriting the regulatory language around microbusinesses so that owners do not have to surrender their license in the course of pursuing another license-type.
 - Commissioner Camargo expressed approval.
 - Commissioner Concepcion stated that she would first like to review impact data.
 - The Chair expressed that she is in favor.
 - Commissioner Roy concurred.

3. Two-Driver Rule Discussion

- The Chair noted that she would be willing to withdraw the discussion of the “two-driver rule” from the agenda. She cited a perceived lack of communication and



consensus.

- Commissioner Camargo stated that the public is expecting a discussion or vote on the matter since it is on the agenda. She recommended keeping it on the agenda. She offered to help produce a formal memo or presentation. She added that there are also other matters within the scope of transportation that require their attention, such as delivery to “no-towns”, liability and more.
- Commissioner Roy thanked Commissioner Camargo and Commissioner Concepcion for their leadership around the “two-driver rule” and delivery model as a whole. She noted that she has met with individuals from across the cannabis delivery spectrum and learned that they are struggling under the current model. She expressed that she is looking forward to a presentation on the subject and is open to suggestions of possible interventions.
- Commissioner Stebbins expressed the desire to have agenda-setting sessions. Commissioner Stebbins indicated that he has many questions about the subject. He added that he would also like input from those working in cannabis delivery as well as Commission staff. He noted that he would especially like to hear from the seven marijuana courier license holders who have commenced operations. He emphasized the need to ensure that all license-types are appealing and lucrative.
- AGC Carter clarified that the “two-driver” rule applies to all manners of transporting marijuana, including from business to business. He suggested that the group consider a sweeping amendment to the rule.
- Commissioner Concepcion asked a clarifying question about the waiver process as it is applicable to the “two-driver rule”.
 - EC Lopez outlined the standard process of applying for a waiver and the applicable criteria per 935 CMR 500.850 and 935 CMR 501.850. She noted that the Commission has received a total of eight waiver requests specific to the “two-driver rule” which were largely denied. She added that the waiver process cannot be used to effectuate a policy change.
 - Commissioner Concepcion asked to clarify that one of the waiver requests was approved.
 - EC Lopez clarified that one application was approved with one reconsideration, for reasons related to the COVID-19 pandemic.
 - Commissioner Concepcion asked if there is anything that can be done short of a regulatory change to provide delivery operators with easier access to waivers.
 - AGC Carter noted that ultimately the Commission has decided on the matter by way of the regulatory process. He added that effectuating a change to that policy would require the same process. He discussed related topics for potential contemplation, including expanding delivering areas.
 - EC Lopez noted that individuals requesting exemptions that are based on a hardship affecting a subset of people are directed to explore the agency’s petition process which leads directly to the regulatory process. She added that there is precedent for the Commission predetermining hardship, as in the case of telehealth waivers.
 - Commissioner Concepcion raised the question of whether a similar

- predetermination could be made with regard to imposed financial hardship.
- EC Lopez indicated that the hardship would have to be determined conclusively through a formal research study.
- Commissioner Concepcion acknowledged that the regulatory process is long and would like to explore what actionable options are available in the short-term.
 - Commissioner Camargo proposed convening staff to determine the most expedient course of action. She encouraged being mindful of resource constraints.
 - AGC Carter suggested that the best path forward is to initiate the necessary research and contemplation, and ensure the proposed amendments are primed for the next regulatory round. He emphasized that policy must be based on fact.

Commissioner Camargo moved to take a ten-minute 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 ten-minute recess, returning at 01:55 PM (03:48:43)

4. Investigative Report Update

- Chief of Investigations and Enforcement Yaw Gyebi (CIE Gyebi) noted that the Investigations and Enforcement department has been working diligently on the Trulieve matter. He extended his condolences to the family and friends of the deceased, Lorna McMurrey. He explained that the department is collaborating with related agencies including OSHA (Occupational Safety and Health Administration) and the Department of Health for assistance. He noted that as the matter is still pending, he cannot provide any additional information.
 - The Chair thanked CIE Gyebi and staff for the process updates that have been furnished to the Commissioners.
- Director of Investigations Nomxolisi Khumalo (DOI Khumalo) disclosed that the Curaleaf investigation has been closed. She added that based on the findings, it was determined that Roman Abramovich holds no control or ownership over the business and that the relationship is of a customary lender-borrower nature.
 - Commissioner Stebbins asked to clarify if the investigation could be reopened if new information was brought forth.
 - DOI Khumalo responded affirmatively.
- Commissioner Roy thanked CIE Gyebi, DOI Khumalo and EC Lopez for the briefings around these matters.
 - The Chair concurred. She thanked CIE Gyebi and the team for their efforts.



- CIE Gyebi thanked the Chair and Commissioners for their engagement in procedural discussions.
- The Chair noted that the MCR investigation has concluded and advised the Commissioners to contact Human Resources with any inquiries.

5. Return to Office Update

- Chief Operations Officer Alisa Stack (COO Stack) noted that the staff has grown to 125 people and counting. She noted that the ED set forth guidance on the return-to-work policy which will be a flexible hybrid model. She added that the plans will be due back on August 15.
- Commissioner Roy thanked COO Stack and those involved with the effort for their diligent work. She noted that many other entities are in the process of considering their return-to-office policy. She further noted the value of both remote and in-office work. She added that the plan will take effect on September 11.
- The Chair asked COO Stack to provide an overview of the new policy.
 - COO Stack offered an overview of the parameters and requirements of the policy, which namely will require that employees report to their individual place of duty four times monthly.
 - Commissioner Camargo expressed her support for the plan. She thanked those involved for their efforts.
- Commissioner Roy asked COO Stack to read what the office space guidelines will be for Commissioners.
 - COO Stack reviewed the guidelines. She raised the question of what “in-office” means for Commissioners with consideration of the Open Meeting Law.
 - The Chair expressed that she would like more time for further contemplation and to revisit the matter.
 - Commissioner Concepcion concurred. She thanked COO Stack and Commissioner Roy for their work on the matter. She noted that the Commissioners’ schedules are highly variable. She asked to clarify the next steps and what is expected from the Commissioners.
- The Chair appointed Commissioner Roy as Acting Chair while she stepped away momentarily.
- COO Stack set forth her expectations for the August 15 deadline.

11) New Business Not Anticipated at the Time of Posting – 04:25:18

- No new items were identified.

12) Next Meeting Date – 04:25:35

- Acting Chair Roy noted that the next meeting would be on September 8, 2023.
- The group discussed the logistics of the public hearing.
- Commissioner Roy gave a tentative schedule for the remainder of the calendar year.

13) Adjournment – 04:33:40

- Commissioner Concepcion moved to adjourn.



- Commissioner Camargo seconded the motion.
- The Acting Chair took a roll call vote:
 - Commissioner Camargo – Did not vote
 - Commissioner Concepcion – Yes
 - Commissioner Roy/Acting Chair – Yes
 - Commissioner Stebbins – Yes
- The Commission unanimously approved the motion to adjourn.

Memorandum

To: Chair O'Brien, and Commissioners Camargo, Concepcion, Roy, and Stebbins
Cc: Shawn Collins, Executive Director
Steve Laduzinski, Associate General Counsel
Andrew Carter, Associate General Counsel
Grace O'Day, Executive Assistant
From: Michael Baker, Associate General Counsel
Date: September 14, 2023
Subject: May 2023 Public Meeting - Tri-annual Review of Executive Session Minutes
– FOR INFORMATION

Summary Recommendation: As part of the Commission's tri-annual review process of executive session minutes,¹ the Legal Department reviewed seventeen sets of minutes not previously disclosed to the public. We recommend that these minutes continue to be withheld because the purpose of the executive sessions remain in effect.

October 8, 2020. The Commission entered executive session under Purpose 7, which allows the Commission to comply with, or act under the authority of, any general or special law. In this executive session, the Commission discussed matters subject to the Second Amended Protective Order (Protective Order) entered in the matter of United States v. Jasiel F. Correia, II & another, United States District Court for the District of Massachusetts Criminal Action No. 18-cr-10364-DPW.

Recommendation: Withhold, because the minutes address matters subject to the Protective Order, we recommend withholding the minutes.

November 19, 2020. The Commission entered executive session under Purpose 7, which is described above, specifically to discuss matters subject to the protective order and that involved Nature's Medicine, Agricultural Healing, and Northeast Alternatives, Inc.

Recommendation: Withhold for the reasons stated above.

June 23, 2022 - Present. The Commission entered executive session fifteen times under Purpose 9, which allows it to meet or to confer with a mediator, as defined in G. L. c. 233, § 23C. The Commission is relying on this purpose to develop a governance charter.

¹ This process satisfies the Commission's statutory obligations to review executive session minutes. G. L. c. 30A, § 22 (g) (1).



Recommendation: Withhold, because the development of a governance charter is still in process and there is a continuing basis for withholding these minutes.

CANNABIS CONTROL COMMISSION

September 8, 2023
10:00 AM

In-Person and Remote Participation via [Microsoft Teams Live*](#)

PUBLIC HEARING MINUTES

1) Call to Order

- The Chair recognized a quorum and called the meeting to order.
- The Chair gave notice that the meeting is being recorded.
- The Chair gave an overview of the process and purpose for the hearing.

2) Public Hearing Testimony – 00:02:49

- Michael Moore, Senator
- Suitability
 - Expressed concern that the expanded suitability standards would provide a means by which individuals with sexual offense convictions may become Registered Agents. Underscored this concern with regard to delivery drivers.
 - Noted his general support of removing barriers to entry for employment within the cannabis industry.
 - Proposed a mandatory and indefinite disqualification of individuals required to register as a sex offender from becoming a Registered Agent. Noted that this provision is already applied to licensure. Further expressed concern that the provision is limited to the preceding five years at the time of application.
 - Commissioner Roy asked to clarify if the Commission has the legal authority to prohibit individuals required to register as sex offenders from serving as retail or delivery operator agents.
 - Senator Moore responded that he believes it does, under M.G.L., c. 94G §4. He quoted the statute.
 - Commissioner Roy asked if Senator Moore was aware of this type of exclusion being utilized elsewhere.
 - Senator Moore cited Lyft, Uber, and similar platforms within the “gig economy” arena.
 - Commissioner Roy asked Senator Moore if the matter falls within the scope of public health, safety, and welfare.
 - Senator Moore responded affirmatively.



- Shaun Suhoski, Town Manager of Athol, MA
- Host Community Agreements
 - Expressed concern that new provisions for Host Community Agreements (HCAs) are impacting established agreements.
 - Suggested that the legislative intent was not for Chapter 180 to be enacted retroactively. Noted that the legislature removed a line from the final draft that would have enacted the laws retroactive to 2016. Cited correspondence from the legislature that he suggested would corroborate this interpretation.

- Ali DiMatteo, Legislative Analyst, Massachusetts Municipal Association
- Host Community Agreements
 - Echoed previous concerns about retroactive enactment being inconsistent with the legislative intent.
 - Suggested that established agreements should be permitted to run their course under the previously agreed upon terms.

- Shaleen Title, Former CCC Commissioner
- Municipal Equity
 - Noted that municipalities not presumed compliant must create an equity plan and suggested devising a process for reviewing the plans initially and on a continued basis to ensure compliance and proper data collection.
 - Recommended developing a model ordinance in the interest of clarity, continuity, less strain on resources, and more efficient lateral comparisons of data.

- Grant Smith Ellis, Independent Journalist
- Host Community Agreements
 - Opined on the necessity of the HCA regulations being applied retroactively. Cited a period of more than 36 months beginning in 2018 wherein HCAs were not being reviewed by the Commission.
- Suitability
 - Noted that registered sex offenders carry their status on a civil basis in perpetuity. He is therefore of the opinion that the catch-all suitability provision should not be limited to the preceding five years at the time of application.
 - Raised the question of how unregistered sex offenders will be detected.

- Lucas Thayer, Provisional License Applicant
- Host Community Agreements
 - Suggested that the current model leaves licensees vulnerable to extortion by municipalities.
 - Objects to the requirement that operators pay rent for the retail space while the HCAs, architectural review, etc. are in development and with no revenue stream. Noted that the financial burden of these expenditures is ultimately passed down to the customer.



- Proposed that the Community Impact Fee (CIF) be reduced by three percent.
- Suitability
 - Echoed prior sentiments about prohibiting registered sex offenders from gaining employment within the cannabis industry.
- Social Consumption
 - Suggested that the Social Consumption license-type should carry an exclusivity period of 10 years for Economic Empowerment Priority (EEP) applicants and Social Equity Program (SEP) participants, given the time required to reach profitability.

- Alisa Nowak, Cohort 1 Social Equity Program Participant
- Host Community Agreements
 - Suggested imposing monetary penalties on municipalities who have not produced a compliant HCA at the time of an operator’s licensure renewal.
 - Suggested rewarding municipalities for either: (i) devising a compliant HCA in a timely manner; or (ii) utilizing the model HCA.
 - Recommended prohibiting municipalities from requesting flat fees or a certain percentage of gross sales.
 - Expressed concern over regulatory language informing parties of their right to discontinue relations. Raised the possibility that it may encourage municipalities to withdraw in objection to the regulations.
 - Remarked that operators should not be penalized for failing to submit a compliant HCA upon license renewal.
 - Suggested including a provision that if communities have a cap on HCAs and have not yet reached that cap then fifty percent of the remaining HCAs be granted to EEP/SEP applicants.
 - Remarked that a lack of efficiency in establishing an HCA causes undue financial burden on the applicant. Suggested time constraints.
- Municipal Equity
 - Proposed that businesses operating in municipalities that have yet to devise an equity plan be granted a CIF waiver.
 - Suggested that municipalities that did not have an equity plan in place by July 1, 2023, as necessitated by Chapter 180 §25, be fined.

- Devin Alexander, CEO and Founder, Rolling Releaf
- Host Community Agreements
 - Expressed concern that marijuana businesses will continue to be vulnerable to exploitation in the intervening time between when the new regulations are promulgated on November 9, 2023, and when they will be enforced in May 2024.
- Suitability
 - Echoed prior sentiments about prohibiting registered sex offenders from gaining employment within the cannabis industry.



- Jeremiah MacKinnon, President & Executive Director, Massachusetts Patient Advocacy Alliance, Inc.
- Telehealth
 - Expounded on the value proposition of telehealth and in particular as it pertains to disabled medical marijuana (MMJ) patients.
 - Encouraged the Commission to make it a permanent option once the waiver period expires.
- Frank Shaw, Patient Advisor, Massachusetts Cannabis Advisory Board
- Telehealth
 - Underscored the subject as an equity matter.
 - Remarked on how his own mobility issues have been prohibitive as a medical marijuana patient.
 - Recommended that the in-person visit requirement for new MMJ be stricken.
- Nicholas Obolensky, Attorney, Obolensky & Balkcom, LLC
- Host Community Agreements
 - Offered anecdotal reports of municipalities acting in bad faith and particularly with regard to implementing the new laws.
 - Suggested that the new regulations be retroactive to 2018 and that municipalities be provided with clear guidance about expectations.
 - Suggested that HCAs should reflect the current applicable laws at the time the business becomes operational.
- Brenda Quintana, Labor & Community Organizer, MA Coalition for Occupational Safety & Health
- Workplace Safety
 - Reflected on the need to expand workplace safety standards.
 - Recommended that the Commission develop and operationalize enforceable rules, trainings and programming tailored to the specific occupational hazards of the cannabis industry.
 - Further recommended that occupational health and safety language be incorporated within the language of HCAs.
- Ryan Dominguez, Executive Director, MassCultivatED
- Host Community Agreements
 - Expressed the need for an expedited implementation timeline for the HCA review process.
 - Urged the Commission to ensure that the HCA review and certification process does not potentially jeopardize license renewals when municipalities do not enter into a compliant agreement.
 - Highlighted the importance of more effective solutions to noncompliant HCAs. Opined that established solutions such as equitable relief for relocation are insufficient.



- Recommended that the Commission prioritize the development of a model HCA.
- Caroline Pineau, Licensee
- Host Community Agreements
 - Expressed the need for operational guidance for HCAs with regard to the intervening time between when the new regulations are promulgated on November 9, 2023, and when they will be enforced in May 2024.
 - Proposed establishing an acceptable notice period for municipality who elect to not renew an HCA as well as an acceptable timeframe for the impacted business to close and/or relocate.
 - Voiced the need for clarity and consistency around municipal accounting.
- Fran Maguire, Licensee
- Host Community Agreements
 - Raised concerns about potential adverse outcomes in the event that an applicant and municipality cannot agree on the terms of an HCA.
 - Opined that the current regulatory language does not compel cities and towns to make a good faith effort to negotiate mutually beneficial agreements.
 - Raised the question of what leverage applicants have under the circumstances.
 - Expressed concern about the threat of cannabis prejudice among local elected officials.
- Cleon Byron, Licensee
- Host Community Agreements
 - Advocated for a more expedient process by which to implement the regulations post-promulgations.
 - Echoed prior sentiments about entities being in a vulnerable position in the intervening time between promulgation and enforcement.
- Ilya Ross, Vice President of Legal & Corporate Development, Trade Roots
- Municipal Equity
 - Voiced support of the Commission's efforts to ensure equity at the municipal level and noted that minimum parameters are a good first step.
- Host Community Agreements
 - Voiced support of the regulatory changes addressing contractual and negotiation requirements, including the certification of CIFs.
- Thomas Dolan, Principal, DD Hotel Advisors
- Social Consumption
 - Expressed objection to not allowing food in a social consumption venue.



- Opined that the concept needs to be developed and particularly with regard to the bifurcation of smoking versus consuming cannabis.
 - Expressed objection to the proposed 20mg consumption limit and noted that alcohol consumption in similar contexts is not limited in this way and advocated for self-governance in this regard.
 - Encouraged the Commission to consult with hospitality professionals as the social consumption model takes shape.
- David O'Brien, President, Massachusetts Cannabis Business Association
 - Host Community Agreements
 - Urged the Commission to implement the regulations expediently.
 - Noted that the Massachusetts Cannabis Business Association conducted two analyses of HCAs which revealed that some municipalities have been misappropriating funds collected from CIFs and failing to produce an accounting of how the funds were used.
 - Requested that the new regulations be enforced retroactively to January 2023, when they first went into effect.
 - Requested that the Commission solicit copies of HCAs from businesses and conduct an independent analysis.
 - Advocated for the issuance of a model HCA.

Commissioner Camargo moved to take a twenty-minute 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 twenty-minute recess, returning at 12:05 PM (02:07:10)

- Linda Tyer, Mayor, Pittsfield, MA
- Host Community Agreements
 - Noted that Pittsfield has been very receptive to the industry and allowed for thirty licenses.
 - Further noted that the town has accepted the movement toward the elimination of CIFs and offered amendments to active HCAs that eliminated these fees.
 - Expressed concern that interfering with established contracts entered into in good faith will sour support for the industry.
 - Advocated for a two-tiered approach that would allow established contracts to



- expire under the original terms.
- Noted that municipalities have no perceived recourse if they are aggrieved by a cannabis business.
- Expressed concern over the strain on municipal resources that the proposed changes would pose.
- Raised the question of the value proposition of HCAs to communities and whether they should be discontinued.
- Municipal Equity
 - Objected to a scoring system and opined that it may be too inflexible to allow the town to issue Social Equity licenses.
 - Expressed that requiring a report on how municipal resources are expended on each licensee is redundant and noted that the same information is part of the public record.
- Paul Brodeur, Mayor, Melrose, MA
- Host Community Agreements
 - Remarked that cities and towns were not expecting the terms of HCAs to be amended when entering into agreements.
 - Explained that HCAs were a crucial point of advocacy in the early stages of establishing the local cannabis industry.
 - Remarked that businesses were eager to enter into HCAs.
 - Raised the question of why they should get relief from existing contracts.
 - Noted that proposed regulations would have major implications on the long-term planning and budgeting that municipalities undergo.
 - Stated that he is in support of fair access efforts but not at the expense of existing agreements.
- Breanna Lungo-Koehn, Mayor, Medford, MA
- Host Community Agreements
 - Explained that she agreed to four HCAs with the fundings and benefits to the community in mind.
 - Expressed concern that interfering with active agreements will result in extensive litigation, sour relations between cannabis businesses and host communities, and negatively impact municipal recourses.
 - Echoed prior sentiments urging the Commission to consider a two-tiered approach.
- Douglas Lapp, Town Administrator, Rockland, MA
- Municipal Equity



- Opined that the proposed mandates would be burdensome to municipal resources.
- Host Community Agreements
 - Remarked that revenue was a factor in voting to allow marijuana establishments in the community.
 - Explained that the town does not have the resources to meet the proposed recordkeeping requirements.
 - Echoed prior sentiments urging the Commission to consider a two-tiered approach.
 - Noted that Rockland voted to maintain the CIF monies in a designated fund. Further noted that the use of the funds is authorized by vote pursuant to a use of funds policy adopted by the Board of Selectmen.
 - Opined the proposed regulations might inspire a mistrust of government. Further opined that the proposed regulations are incongruent with the legislative intent.
- Kevin Rudden, Chair, Massachusetts Association of Assessing Officers
- Taxation/Municipal Requirements
 - Requested that the Commission compel marijuana establishments to submit (i) MA State Tax Form 2 (Form of List) to identify personal property under their ownership and its value; and (ii) MA State Tax Form LA-39D (Annual Expenses for All Property Types) to the assessors of their host community for the issuance of property tax bills.
- Lynsi Sheckler, Senior Director of Compliance, Security & Regulatory Affairs, Acreage Holdings
- Market Saturation
 - Expressed concern that the proposed regulations do not seem to address oversupply and market saturation. Noted that cannabis supply is currently three times that of the previous year.
 - Recommended that the Commission halt licensing until the oversupply is corrected, as well as require cultivators to provide inventory and production records upon renewal of licensure and assert the discretionary right to reduce a licensee's maximum cultivation canopy.
- Definitions
 - Recommended amending the definition of "Gross Annual Sales" to include returns and discounts and not top line revenue.
- Host Community Agreements
 - Recommended allowing operators to maintain business operations in the event that a municipality does not want to renew an HCA.



- Blake Mensing, Attorney, The Mensing Group, LLC
- Municipal Equity
 - Objected to the presumption that municipalities are acting within the interest of marijuana establishments.
 - Echoed prior concerns about cannabis prejudice.
- Host Community Agreements
 - Asserted that the original statute concerning CIFs was clear that the fees had to be reasonably related, sufficiently documented, and not result in a net positive.
 - Suggested that there is an imbalance of power in the HCA process that favors municipalities.
 - Suggested that there is a fundamental and willful misunderstanding among municipalities around the function of CIFs.

- Alisa Brewer, Retired At-Large Town Councilor, Amherst, MA
- Municipal Equity
 - Outlined the impact on resources the proposed regulations would have on municipal resources.
 - Advocated for more expedient action and better guidance on the part of the Commission.
 - Recommended that the Commission pre-certify applicants before they seek HCAs.

- Kevin Gilnack, Consultant, Equitable Opportunities Now
- Equity
 - Urged the Commission to take advantage of the prerogative granted by Chapter 180 to refocus the prioritization of Marijuana Treatment Centers toward SEP/EEP enterprises instead.
 - Encouraged the Commission to strengthen regulatory language around licensing ratios to ensure more equitable industry participation.

- Ellen Brown, Founder, Green Path Training
- Suitability
 - Recommended that the literature about suitability standards include data and information about why removing specific mandatory disqualifiers is for the betterment of the industry.
 - Expressed concern that mandatory disqualifications were being removed for registered and unregistered sex offenders and individuals with human trafficking convictions but restrictions would remain in place with regard to certain cannabis convictions.
 - Advocated for the swift implementation of the Leadership Rating Program.

- Expressed concern over sex offenders being permitted to seek employment in the industry given the notable pediatric care element in the MMJ arena.
- Equity
 - Encouraged greater focus on licensing minority-owned businesses.
 - Echoed prior sentiments in support of telehealth.
- Harry Jean Jacques, Co-Founder, Big Hope Project
- Municipal Equity
 - Urged the Commission to look more closely at what the cities of Boston and Cambridge are doing to implement equitable practices. He outlined some of those practices.
 - Opined that the Commission has failed to meet statutory equity imperatives and its obligation to those disproportionately affected by the War on Drugs.
 - Encouraged the Commission to actively implement regulations, including those pertaining to CIFs that may disproportionately affect equity applicants.
 - Proposed a municipal equity priority period for the next four years.
- Charles Carey, Town Administrator, Brookline, MA
- Municipal Equity
 - Suggested that if the proposed regulations are advanced, Brookline may be unable to accommodate any new Equity applicants and may be resigned to leave the cannabis business altogether.
 - Recommended that the regulatory language be clearer that communities can license cannabis businesses.
 - Expressed concern over the municipal personnel resources being dedicated to cannabis industry matters.
 - Objected to the ability of any “interested party” to lodge a complaint against a municipality for non-compliance with equity standards as it may pose an opportunity for bad faith actors to weaponize the system.
- Juwan Skeens, Candidate for Boston City Council, At-Large
- Civic Engagement
 - Recommended that some of the tax dollars generated from the industry be designated to childcare vouchers, school lunches, books, etc. for families in Disproportionately Impacted Areas as well as non-profits and public transportation.
- Equity
 - Advocated for a more economical Social Equity Program application process.
- Patricia Cooney, RN, Department of Public Health
- Telehealth



- Echoed prior comments in support of telehealth. Noted that she is a nurse specializing in cannabis-involved care. Reflected on how telehealth has been invaluable to her family.
- Opined that medical marijuana treatment should be able to be administered in a school setting for those with a prescription.
- Diego Bernal, Co-Founder, Coastal Healing
- Host Community Agreements
 - Remarkd that he felt pressured to accept a suboptimal HCA as his startup funds continued to become depleted.
 - Expressed that he is willing to reimburse his host community for any costs incurred by the operation of his marijuana establishment but has learned that it has cost the town nothing.
 - Echoed prior sentiments that the new provisions around CIFs should be implemented as efficiently as possible following promulgation.

3) Next Meeting Date– 03:21:30

- The Chair noted the next meeting would be on September 14, 2023.
- The Chair raised a procedural question about how the body would continue with their discussion of the draft regulations at the following public meeting. She invited Commissioner Stebbins to comment.
 - Commissioner Stebbins noted that he would like the opportunity to revisit the proposed regulations after hearing public testimony and suggested that the working groups may want the opportunity to do so as well.
 - The Chair indicated that she would like to discuss the public testimony with the working groups.
 - Acting General Counsel Andrew Carter (AGC Carter) echoed Commissioner Stebbins’ recommendation to allow the working groups to reconvene with their respective Commissioners to review the testimony. He added that any resulting proposed changes should be contemplated in the context of a public meeting.
- Commissioner Roy asked AGC Carter if the public meetings would include live edits.
 - AGC Carter responded affirmatively.
- Commissioner Camargo invited comments from the Commissioners in the HCA and Municipal Equity working groups. She raised a concern about scheduling conflicts.
- Commissioner Roy noted recurring themes from the public testimony which she suggested may help to expedite the working groups’ deliberation efforts. She further noted that the September 14 public meeting is for licensing matters. She proposed holding a dedicated meeting on September 15.
- Commissioner Stebbins stated that he does not want to rush the working groups and that the meeting date should be determined by their needs, if possible. He asked AGC Carter to clarify the deadline.
 - AGC Carter noted that he did not have the date on hand but would follow up.



- Commissioner Concepcion proposed holding one meeting to discuss Municipal Equity and another for HCAs.
- Commissioner Camargo encouraged seeking clarification from the working groups where needed but noted that it would be prudent to act decisively, given the time constraints.
 - The Chair agreed and suggested that the Commissioners meet one-on-one and with staff as needed for additional information. She indicated that she would coordinate with Project Manager, Mercedes Erickson (PM Erickson) to solidify the meeting dates.
- Commissioner Roy asked if the regulatory language would need to be re-written in real time or if the Legal department would take point on that afterward.
 - PM Erickson replied that, as with the regulatory review meetings, Legal would make any final amendments to the verbiage.
 - AGC Carter concurred.
- Commissioner Roy asked to clarify that the Legal department would be on hand during the meeting.
 - AGC Carter responded that Legal would be on hand to offer guidance, as with the regulatory review meetings.
- Commissioner Roy thanked those who provided testimony and underscored its importance to the regulatory process.
- The Chair reiterated that the next public meeting would be held on September 14 as well as September 15, 18, and 19, tentatively.

4) Adjournment – 03:53:26

- Commissioner Camargo moved to adjourn.
- 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 the motion to adjourn.



CANNABIS CONTROL COMMISSION

September 14, 2023
10:00 AM

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

PUBLIC MEETING MINUTES

Documents:

- Application Materials associated with:
 - Staff Recommendations on Changes of Ownership
 - Four Score Holdings, LLC
 - Four Trees Holyoke, LLC
 - I.N.S.A., Inc.
 - LMCC, LLC, (#0209-COO-03-1222)
 - LMCC, LLC, (#0208-COO-03-1222)
 - NEO Manufacturing MA, LLC
 - TSC Operations, LLC
 - Staff Recommendations on Provisional Licenses
 - Alternative Compassion Services, Inc. (#MRN284457), Retail
 - Coastal Roots, LLC (#MCN283846), Cultivation / Tier 1
 - Coastal Roots, LLC (#MPN282266), Product Manufacturing
 - Eudaimonia Health, LLC (#MCN283783), Cultivation / Tier 2
 - Eudaimonia Health, LLC (#MPN282224), Product Manufacturing
 - Healing Greene Massachusetts (#MRN284583), Retail
 - JO Gardner, Inc. (#MRN284026), Retail
 - Ogeez Brands MA, LLC (#MPN282203), Product Manufacturing
 - Pluto Cannabis Co. (#MR284913), Retail
 - Raices on the Hill, LLC (#MRN284380), Retail
 - Staff Recommendations on Final Licenses
 - Advesa MA, Inc. (#MR281454), Retail
 - Cannalive Genetics, LLC (#MB282302), Microbusiness (Cultivation)
 - Cape Cod Grow Lab, LLC (#MC281275), Cultivation / Tier 2
 - Holland Brands SB, LLC (#MR284733), Retail
 - Impressed, LLC (#MP281823), Product Manufacturing
 - Jolly Green, Inc. (#MC283508), Cultivation / Tier 2
 - Jolly Green, Inc. (#MP282234), Product Manufacturing
 - Leaf Lux Group, Inc. (#MR284051), Retail
 - Legacy Foundation Group, LLC (#IL281352), Independent Testing Laboratory



- Low Key, LLC (#MR283332), Retail
- Lucky Green Ladies, LLC (#MD1282), Marijuana Delivery Operator
- Power Fund Operations, LLC (#MC281359), Cultivation / Tier 3
- UC Retail, LLC (#MR284616), Retail
- Berkshire Roots, Inc. (#MTC3480), Vertically Integrated Medical Marijuana Treatment Center
- Staff Recommendations on Renewal Licenses
 - 311 Page Blvd Holding Group LLC (#MRR206515)
 - Alternative Therapies Group II, Inc. (#MRR206519)
 - Alternative Therapies Group II, Inc. (#MRR206522)
 - Alternative Therapies Group II, Inc. (#MRR206577)
 - ARL Healthcare Inc. (#MRR206516)
 - ARL Healthcare Inc. (#MPR244026)
 - ARL Healthcare Inc. (#MCR140545)
 - ARL Healthcare Inc. (#MRR206593)
 - B Leaf Wellness Centre LLC (#MRR206568)
 - Beacon Compassion, Inc. (#MRR206546)
 - BKPN LLC (#MRR206608)
 - Budega, Inc. (#MRR206591)
 - Bud's Goods & Provisions Corp. (#MCR140553)
 - Bud's Goods & Provisions Corp. (FKA Trichome Health Corp.) (#MRR206535)
 - Bud's Goods and Provisions, Corp. (#MPR244030)
 - Caroline's Cannabis, LLC (#MRR206563)
 - Cedar Roots LLC (#MPR244056)
 - Cedar Roots LLC (#MCR140580)
 - Cloud Creamery LLC (#MPR244058)
 - COASTAL CULTIVARS, INC. (#MCR140577)
 - Coyote Cannabis Corporation fka MRM Industries LLC (#MPR244042)
 - Curaleaf Massachusetts Inc (#MRR206573)
 - Curaleaf Massachusetts Inc (#MRR206572)
 - Deerfield Naturals, Inc. (#MRR206575)
 - Deerfield Naturals, Inc. (#MPR244043)
 - Deerfield Naturals, Inc. (#MCR140560)
 - East Boston Bloom, LLC (#MRR206471)
 - FFD Enterprises MA (#MRR206614)
 - FFD Enterprises MA, Inc. (#MRR206588)
 - FFD Enterprises MA, Inc. (#MPR244057)
 - FFD Enterprises MA, Inc. (#MCR140581)
 - Four Score Holdings LLC (#MRR206616)
 - Green Theory Cultivation, LLC (#MPR244024)
 - Green Theory Cultivation, LLC (#MCR140541)
 - Grow Rite, LLC (#MCR140571)
 - GTE Franklin LLC (#MRR206527)
 - H&H Cultivation LLC (#MCR140512)
 - Heal Sturbridge, Inc. (#MRR206582)



- Highmark Provisions, LLC (#MCR140559)
- Holistic Health Group Inc. (#MRR206587)
- HOLYOKE 420 LLC (#MRR206602)
- HVV Massachusetts, Inc. (#MCR140550)
- HVV Massachusetts, Inc. (#MRR206576)
- I.N.S.A., Inc. (#MRR206613)
- I.N.S.A., Inc. (#MPR244059)
- KG Collective LLC (#MRR206578)
- LC Square, LLC. (#MCR140549)
- Leaf Relief, Inc. (#MRR206615)
- Liberty Market (#MRR206603)
- Local Roots NE Inc. (#MRR206551)
- Local Roots NE, Inc. (#MRR206561)
- Mass Wellspring LLC (#MRR206559)
- Massachusetts Citizens for Social Equity LLC (#MRR206569)
- Massachusetts Citizens for Social Equity LLC (#MRR206570)
- Massbiology Technology, LLC (#MCR140569)
- Massbiology Technology, LLC (#MPR244052)
- MassGrow, LLC (#MPR244019)
- MassGrow, LLC (#MCR140535)
- MCR Labs, LLC (#ILR267927)
- Mill Town Agriculture, LLC (#MCR140558)
- Misty Mountain Shop, LLC (#MRR206586)
- MRM Industries LLC (#MCR140564)
- Nature's Medicines, Inc. (#MRR206555)
- Nature's Medicines, Inc. (#MRR206554)
- Nature's Medicines, Inc. (#MCR140554)
- Nature's Medicines, Inc. (#MRR206556)
- NEO Manufacturing MA LLC (#MCR140530)
- NEO Manufacturing MA LLC (#MPR244034)
- New England Treatment Access, LLC. (#MRR206525)
- New England Treatment Access, LLC. (#MRR206544)
- New England Treatment Access, LLC. (#MMRR206545)
- New England Treatment Access, LLC. (#MPR244035)
- New England Treatment Access, LLC. (#MCR140548)
- Old Planters of Cape Ann, Inc. (#MRR206539)
- Pharmacannis Massachusetts Inc. (#MRR206539)
- Pineapple Express, LLC (#MDR272556)
- Power Fund Operations (fka) Silver Therapeutics, Inc. (#MPR244045)
- Pure Oasis LLC (#MRR206547)
- Pure Oasis LLC (#MRR206564)
- Sama Productions, LLC (#MCR140497)
- SIRA NATURALS, INC. (#MCR140562)
- SIRA NATURALS, INC. (#MCR140563)
- Sira Naturals, Inc. (#MRR206468)
- Sira Naturals, Inc. (#MCR140513)



- Sira Naturals, Inc. (#MRR206476)
- SIRA NATURALS, INC. (#MPR244039)
- Sira Naturals, Inc. (#MRR206470)
- Solar Therapeutics Inc. (#MRR206584)
- Solar Therapeutics, Inc. (#MRR206585)
- Stafford Green, Inc. (#MCR140534)
- SunnyDayz Inc. (#MCR140567)
- The Heirloom Collective, Inc. (#MPR244044)
- The Heirloom Collective, Inc. (#MCR140568)
- Theory Wellness Inc (#MRR206566)
- Trifecta Farms Corp (#MPR244047)
- Trifecta Farms Corp (#MCR140570)
- UPROOT LLC (#MBR169320)
- Xhale New England Dispensary LLC (#MRR206540)
- Commonwealth Alternative Care, Inc. (#RMD1126)
- Holistic Health Group, Inc. d/b/a Suncrafted (#RMD1566)
- HVV Massachusetts, Inc. (#RMD1766)
- I.N.S.A., Inc. (#RMD3362)
- M3 Ventures, Inc. (#RMD465)
- M3 Ventures, Inc. (#RMD806)
- Mass Wellspring, LLC (#RMD665)
- Nature's Medicines, Inc. (#RMD1045)
- New England Treatment Access, LLC (#RMD3028)
- Northeast Alternatives, Inc. (#RMD745)
- Sira Naturals, Inc. (#RMD245)
- Sira Naturals, Inc. (#RMD625)
- Sira Naturals, Inc. (#RMD325)
- The Heirloom Collective, Inc (#RMD825)
- Theory Wellness, Inc. (#RMD525)
- Staff Recommendations on Responsible Vendor Training
 - DSBWorldWide, Inc. (#RVN454097)
- Staff Recommendations on Responsible Vendor Training Renewals
 - Medical Marijuana 411 (MM411, Inc) (#RVR453141)
- Memorandum Re: Periodic Review of Executive Session Minutes
- [Meeting Packet](#)

In Attendance

- Commissioner Nurys Z. Camargo
- Commissioner Ava Callender Concepcion
- Commissioner Kimberly Roy
- Commissioner Bruce Stebbins

Minutes:

- 1) Call to Order
 - Commissioner Roy noted that she would serve as the acting Chair (AC) for the



duration of the meeting.

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

2) Commissioners' Comments and Updates – 00:02:02

- Commissioner Camargo thanked the Commissioners and staff for their work to facilitate the public meeting. She noted that September 15 marked the start of Hispanic Heritage Month and she reflected on her status as one of the state's first Latina Commissioners. She discussed attending the New England Streetworker Conference at Gillette Stadium and the importance of outreach professionals.
- Commissioner Concepcion thanked those who participated in the public hearing and public comment process. She expressed the importance of preserving the mindset of a public servant in the course of her work. She recognized the Equity Programming and Public Outreach team for their role in the recent Intersection of Equity and Cannabis event. She congratulated Commissioner Camargo on being honored as one of the Amplify Latinx 100.
- Commissioner Stebbins recognized the Licensing team for their ongoing efforts to process applications. He thanked the members of the Social Equity and Communications staff that took part in the Intersection of Cannabis and Equity event. He observed a strong interest in entering the cannabis industry at the event. He remarked on recent news that the Massachusetts cannabis economy has surpassed \$5B in adult-use sales since legalization. He committed to reviewing other regulations once the work of Chapter 180 was completed.
- The AC congratulated Commissioners Camargo and Concepcion for being honored as part of the Boston Business Journal's 40 under 40 list. She thanked those who submitted testimony for the public hearing. She recognized Commission staff at large for their effort in facilitating the public hearing. She shared her experience attending the North East Regional Cannabis Symposium and hosting a roundtable discussion of small-scale operators regarding the draft regulations.

3) Minutes for Approval – 00:12:25

- June 8, 2023
- The AC asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
- Commissioner Camargo moved to approve the minutes for the June 8, 2023, Commission public meeting.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes



- The Commission approved the minutes for June 8, 2023, by a vote of four in favor and zero opposed.

- June 26, 2023
- The AC asked if the Commissioners had a chance to review the minutes and whether there were questions or edits.
- Commissioner Concepcion moved to approve the minutes for the June 26, 2023, Commission public meeting.
- Commissioner Stebbins seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the minutes for June 26, 2023, by a vote of four in favor and zero opposed.

- July 13, 2023
- The AC 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 13, 2023, Commission public meeting.
- Commissioner Camargo seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the minutes for July 13, 2023, by a vote of four in favor and zero opposed.

4) Executive Director’s Report – 00:13:52

- Director of Communications Cedric Sinclair (Director Sinclair) explained that he and other staff will deliver the Executive Director’s Report in his absence. CCO Sinclair explained ED Collins had delegated his authority for administrative oversight of the Commission during his absence to CCO Cedric Sinclair, COO Alisa Stack, CIE Yaw Gyebi, CPO Debbie Hilton-Creek and Acting GC Andrew Carter. He shared that the Intersection of Cannabis and Equity event marked the return of in-person external events for the Equity Programming and Community Outreach team. He added that the event will be replicated statewide. He discussed chairing the Cannabis Advisory Board (CAB) meeting. He shared feedback and updates from the meeting, which is outlined on page 178 of the Meeting Packet. He noted that Director of Government Affairs and Policy Matt Giancola (Director Giancola) and his team are working to consolidate and disseminate the feedback.



- Commissioner Camargo asked Director Sinclair if any of the feedback for the Commissioners related to Chapter 180 and should be contemplated alongside the public testimony.
 - Director Sinclair responded affirmatively that some of the discussion and feedback pertained to Chapter 180.
- The AC asked Director Sinclair to clarify his statement that the CAB expressed frustration at a perceived lack of access to the Commission.
 - Director Sinclair clarified that the CAB is seeking more interaction with the Commissioners and staff, to convene more frequently, and to have more opportunities to bring policy issues forward to the agency. He added that their perspective would be highly valuable both operationally and in terms of regulatory development.
- The AC asked when the previous meeting was held.
 - Director Sinclair replied that it was held in April of 2022.
- The AC asked if minutes were recorded.
 - Director Sinclair responded that minutes were not recorded but that there is video of the proceedings.
- The AC thanked the CAB and subcommittees for their input.
- Commissioner Camargo noted that the CAB has a strong interest in weighing in on the topics of social consumption and the “two-driver rule”. She shared that she and Commissioner Concepcion would be meeting with the Public Safety subcommittee to discuss courier and delivery matters. She added that she and Commissioner Stebbins would be reach out to CAB members regarding social consumption in the near future.
- Director Sinclair noted that Director Giancola brought on additional resources to help facilitate greater engagement between the Commission and the CAB.
- The AC stated that she has been approached by members of the CAB for information on how to apply for reappointment. She asked what resources are available to them.
 - Director Sinclair replied that their positions are appointed by constitutional officers and not the Commission, but that Director Giancola would be a great resource to help them connect to the appropriate parties.
- Director Sinclair disclosed the recent onboarding of a new Chief People Officer, Debra Hilton-Creek (CPO Hilton-Creek). He invited her to comment.
- CPO Hilton-Creek analyzed how HR can best nurture the mission of the agency, and that the growth and development of the people in the agency is her top priority. She added that a report of her findings is forthcoming.
- Director Sinclair disclosed that a blogger published misinformation about the agency’s HR practices with regard to the open Deputy Executive Director position. He added that the Commission was compelled to issue a statement in response. He explained that the nature of the allegations necessitated a more defensive stance than is customary.
- Commissioner Concepcion congratulated Chief Financial and Accounting Officer Adriana León (CFAO León) on her designation as one of the Boston Business Journal’s 2023 CFOs of the Year.

- CFAO León offered FY23 close-out and FY24 budget updates, which begin on page 183 of the Meeting Packet. She thanked the Legislature for their support. She acknowledged the six hundred-thousand-dollar shortfall in the budget request.
- Commissioner Camargo asked to clarify what information has been communicated to the staff regarding personnel retention.
 - Chief Operating Officer Alisa Stack (COO Stack) shared that a meeting was held to inform the staff of budget developments and offer reassurance that the agency is prioritizing all current payroll. She said we will not have growth in this fiscal year.
- The AC asked what changes have already been made in response to the new budget and if the Commissioners will be able to offer input.
 - COO Stack explained that out-of-state travel has been halted and hiring plans are being further scrutinized. She added that it generally has been and will be an ad hoc process and that she would be happy to brief the Commissioners further.
- The AC asked whether merit increases would be impacted.
 - COO Stack responded that merit increases will need to be taken under advisement.
- The AC asked if there will be any future opportunities to seek supplemental funding.
 - COO Stack replied that DOC Sinclair and his team will be consulted about the legislative schedule and how best to illustrate the need for more funding.
- Commissioner Concepcion asked CFAO León if a cost analysis would be executed with respect to implementing the new regulations.
 - CFAO León that the projections submitted to the legislature in 2022 and presented publicly focused on staffing and contracts.
- The AC asked to clarify the amount of revenue generated by the agency in proportion to the budget request.
 - CFAO León responded that the cumulative total of tax related and non-tax related revenue in FY23 was \$276.4M.
- Commissioner Camargo explained that she is the Commission's sitting Treasurer and that her term as such will conclude in January. She thanked CFAO León for her diligence and attention to detail in preparing the budget update. She likewise thanked COO Stack for her contributions. She reflected on shaping the Treasurer role. She encouraged staff to settle all invoices in a timely manner and thanked them for their efforts to help keep the agency transparent about spending.
- The AC discussed the Marijuana Regulation Fund and how revenue from the cannabis industry is distributed back to the community by way of substance abuse treatment resources, restorative justice initiatives, etc.

5) Executive Session – 00:48:46

- Commissioner Camargo moved to enter Executive Session pursuant to the Open Meeting Law, G.L., c. 30A § 21(a)(9) under Purpose (3) to discuss collective bargaining or litigation if an open meeting may have detrimental effect on the bargaining, or for litigation purposes and the chair so declares.
- Commissioner Concepcion seconded the motion.



- The acting Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved entering Executive Session by a vote of four in favor and zero opposed.
- The AC read the list of participants entering into Executive Session:
 - Commissioner Camargo
 - Commissioner Concepcion
 - Acting Chair Roy
 - Commissioner Stebbins
 - Acting General Counsel Andrew Carter
 - Chief Operating Officer Alisa Stack
 - Chief People Officer Debra Hilton-Creek
 - Associate General Counsel Michael Baker
 - Jaclyn Kugell, Esq.
- The AC stated that the Commission will reconvene in Open Session at the conclusion of the Executive Session.

6) Staff Recommendations on Changes of Ownership – 04:50:00

1. Four Score Holdings, LLC

- Licensing Manager Tsuko Defoe (Licensing Manager Defoe) presented the Staff Recommendation for Change of Ownership.
- Commissioner Camargo moved to approve the Change of Ownership.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the Change of Ownership by a vote of four in favor and zero opposed.

2. Four Trees Holyoke, LLC

- Licensing Manager Defoe presented the Staff Recommendation for Change of Ownership.
- The AC asked for questions or comments.
- Commissioner Concepcion moved to approve the Change of Ownership.
- Commissioner Stebbins seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes



- Commissioner Concepcion – Yes
- Acting Chair Roy – Yes
- Commissioner Stebbins – Yes
- The Commission approved the Change of Ownership by a vote of four in favor and zero opposed.

3. I.N.S.A., Inc.

- Licensing Manager Defoe presented the Staff Recommendation for Change of Ownership.
- The AC asked for questions or comments.
- Commissioner Stebbins moved to approve the Change of Ownership.
- Commissioner Camargo seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the Change of Ownership by a vote of four in favor and zero opposed.

4. LMCC, LLC, (#0209-COO-03-1222)

- Licensing Manager Defoe presented the Staff Recommendation for Change of Ownership.
- The AC asked for questions or comments.
- Commissioner Camargo moved to approve the Change of Ownership.
- Commissioner Concepcion seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes

The Commission approved the Change of Ownership by a vote of four in favor and zero opposed.

5. LMCC, LLC, (#0208-COO-03-1222)

- Licensing Manager Defoe presented the Staff Recommendation for Change of Ownership.
- The AC asked for questions or comments.
- Commissioner Concepcion moved to approve the Change of Ownership.
- Commissioner Stebbins seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes



- The Commission approved the Change of Ownership by a vote of four in favor and zero opposed.

6. NEO Manufacturing MA, LLC

- 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.
- Commissioner Camargo seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the Change of Ownership by a vote of four in favor and zero opposed.

7. TSC Operations, LLC

- Licensing Manager Defoe presented the Staff Recommendation for Change of Ownership.
- The Chair asked for questions or comments.
- Commissioner Camargo moved to approve the Change of Ownership.
- Commissioner Concepcion seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the Change of Ownership by a vote of four in favor and zero opposed.

7) Staff Recommendations on Provisional Licenses – 04:57:52

1. Alternative Compassion Services, Inc. (#MRN284457), Retail

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- Commissioner Stebbins requested a condition.
 - 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 Code Mass. Regs. § 500.101(1)(c) 8k.
- Commissioner Concepcion moved to approve the Provisional License, subject to the condition requested by Commissioner Stebbins.
- Commissioner Stebbins seconded the motion.



- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the Provisional License, subject to the condition requested by Commissioner Stebbins, by a vote of four in favor and zero opposed.

2. Coastal Roots, LLC (#MCN283846), Cultivation / Tier 1

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- The Chair asked for questions or comments.
- Commissioner Stebbins requested a condition.
 - Proposed Condition: Prior to Final Application for Licensure, consider review and update diversity hiring goals in Diversity Plan based on statistics of host community and region in accordance with 935 Code Mass. Regs. § 500.101(1)(c)8k and provide any updates to CCC Licensing Division
- Commissioner Concepcion moved to approve the Provisional License, subject to the condition requested by Commissioner Stebbins.
- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the Provisional License, subject to the condition requested by Commissioner Stebbins, by a vote of four in favor and zero opposed.

3. Coastal Roots, LLC (#MPN282266), Product Manufacturing

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- The Chair asked for questions or comments.
- Commissioner Stebbins requested a condition.
 - Proposed Condition: Prior to Final Application for Licensure, consider review and update diversity hiring goals in Diversity Plan based on statistics of host community and region in accordance with 935 Code Mass. Regs. § 500.101(1)(c)8k and provide any updates to CCC Licensing Division
- Commissioner Concepcion moved to approve the Provisional License, subject to the condition requested by Commissioner Stebbins.
- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes



- Commissioner Stebbins – Yes
 - The Commission approved the Provisional License, subject to the condition requested by Commissioner Stebbins, by a vote of four in favor and zero opposed.
4. Eudaimonia Health, LLC (#MCN283783), Cultivation / Tier 2
- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
 - The Chair asked for questions or comments.
 - Commissioner Stebbins requested conditions.
 - Proposed Conditions:
 - 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 Code Mass. Regs. § 500.101(1)© 8k.
 - Prior to Final Application for Licensure, contact CCC Licensing Division and provide an update to identify any goals for utilizing LGBTQ+ business enterprises (LGBTBE's) and Disability-Owned Business Enterprises (DOBEs) under licensee's Diversity Plan in accordance with 935 CMR § 500.101(1)(c)8k.
 - Prior to Final Application for Licensure, review Positive Impact Plan and verify non-profit partner status and eligibility to support your activities in accordance with 935 Code Mass. Regs. § 500.101(1)(a)11 and provide any updates to CCC Licensing Division.
 - Commissioner Stebbins moved to approve the Provisional License subject to the conditions requested by Commissioner Stebbins.
 - Commissioner Camargo seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
 - The Commission approved the Provisional License, subject to the conditions requested by Commissioner Stebbins, by a vote of four in favor and zero opposed.
5. Eudaimonia Health, LLC (#MPN282224), Product Manufacturing
- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
 - The Chair asked for questions or comments.
 - Commissioner Stebbins requested conditions.
 - Proposed Conditions:
 - 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 Code Mass. Regs. § 500.101(1)(c) 8k.



- Prior to Final Application for Licensure, contact CCC Licensing Division and provide an update to identify any goals for utilizing LGBTQ+ business enterprises (LGBTBE's) and Disability-Owned Business Enterprises (DOBEs) under licensee's Diversity Plan in accordance with 935 CMR § 500.101(1)(c)8k.
 - Prior to Final Application for Licensure, review Positive Impact Plan and verify non-profit partner status and eligibility to support your activities 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 Commissioner Stebbins.
 - Commissioner Concepcion seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
 - The Commission approved the Provisional License, subject to the conditions requested by Commissioner Stebbins, by a vote of four in favor and zero opposed.
6. Healing Greene Massachusetts (#MRN284583), Retail
- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
 - The Chair asked for questions or comments.
 - Commissioner Camargo moved to approve the Provisional License.
 - Commissioner Concepcion seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
 - The Commission approved the Provisional License by a vote of four in favor and zero opposed.
7. JO Gardner, Inc. (#MRN284026), Retail
- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
 - The AC asked for questions or comments.
 - Commissioner Roy requested a condition.
 - Proposed Condition: Prior to Final Application for Licensure, consider review and update diversity hiring goals in Diversity Plan based on statistics of host community and region in accordance with 935 Code Mass. Regs. § 500.101(1)(c)8k and provide any updates to CCC Licensing Division
 - Commissioner Stebbins requested a condition.



- Proposed condition: Prior to Final Application for Licensure, review Positive Impact Plan and clarify strategy for programming in Areas of Disproportionate Impact designated communities of Taunton and Wareham and provide any update in accordance with 935 Code Mass. Regs. § 500.101(1)(a)11
 - Commissioner Concepcion moved to approve the Provisional License, subject to the conditions requested by Commissioners Roy and Stebbins.
 - Commissioner Stebbins seconded the motion.
 - The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
 - The Commission approved the Provisional License, subject to the conditions requested by Commissioners Roy and Stebbins, by a vote of four in favor and zero opposed.
8. Ogeez Brands MA, LLC (#MPN282203), Product Manufacturing
- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
 - 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 in accordance with 935 CMR 500.130(5)(k) and 935 CMR 500.130 (9).
 - Commissioner Concepcion 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
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
 - The Commission approved the Provisional License, subjected to the condition requested by Commissioner Roy, by a vote of four in favor and zero opposed.
9. Pluto Cannabis Co. (#MR284913), Retail
- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
 - 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 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
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the Provisional License, subject to the condition requested by Commissioner Roy, by a vote of four in favor and zero opposed.

10. Raices on the Hill, LLC (#MRN284380), Retail

- Licensing Manager Defoe presented the Staff Recommendation for the Provisional License.
- 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 in accordance with 935 CMR 500.130(5)(k) and 935 CMR 500.130 (9).
- Commissioner Camargo moved to approve the Provisional License, subject to the condition requested by Commissioner Roy.
- Commissioner Concepcion seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the Provisional License, subject to the condition requested by Commissioner Roy, by a vote of four in favor and zero opposed.

8) Staff Recommendations on Final Licenses – 05:11:22

- The AC noted that Final Licenses would be considered in rosters.
- Licensing Manager Defoe presented the Staff Recommendations for Final Licenses.
- Adult-Use and Medical-Use Rosters
- The AC noted that the Final License roster will consist of items numbered 1 through 14, as identified on the agenda.
- The AC asked for questions or comments.
- Commissioner Concepcion moved to approve the roster of Final Licenses.



- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- Commission approved the roster of Final Licenses by a vote of four in favor and zero opposed.

1. Advesa MA, Inc. (#MR281454), Retail
2. Cannalive Genetics, LLC (#MB282302), Microbusiness (Cultivation)
3. Cape Cod Grow Lab, LLC (#MC281275), Cultivation / Tier 2
4. Holland Brands SB, LLC (#MR284733), Retail
5. Impressed, LLC (#MP281823), Product Manufacturing
6. Jolly Green, Inc. (#MC283508), Cultivation / Tier 2
7. Jolly Green, Inc. (#MP282234), Product Manufacturing
8. Leaf Lux Group, Inc. (#MR284051), Retail
9. Legacy Foundation Group, LLC (#IL281352), Independent Testing Laboratory
10. Low Key, LLC (#MR283332), Retail
11. Lucky Green Ladies, LLC (#MD1282), Marijuana Delivery Operator
12. Power Fund Operations, LLC (#MC281359), Cultivation / Tier 3
13. UC Retail, LLC (#MR284616), Retail
14. Berkshire Roots, Inc. (#MTC3480), Vertically Integrated Medical Marijuana Treatment Center

9) Staff Recommendations on Renewals – 05:12:29

- The AC noted that the Renewal Licenses will be considered in rosters.
- Licensing Manager Defoe presented the Staff Recommendations for Renewal Licenses.
- Adult-Use
- The AC noted that the first Adult-Use Renewal roster will consist of item numbered 1, as identified on the agenda.
- The AC asked for questions or comments.
- Commissioner Camargo moved to approve the roster of Adult-Use Renewals.
- Commissioner Concepcion seconded the motion.
- The acting AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Recused
- The Commission approved the Adult-Use Renewals by a vote of three in favor and zero opposed.



- Adult-Use
- The AC noted that the second Adult-Use Renewal roster will consist of item number 99, as identified on the agenda.
- The AC asked for questions or comments.
- Commissioner Concepcion moved to approve the roster of Adult-Use Renewals.
- Commissioner Stebbins seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Recused
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the Adult-Use Renewals by a vote of three in favor and zero opposed.

- Adult-Use
- The AC noted that the second Adult-Use Renewal roster will consist of items numbered 2-98 and 100-113, as identified on the agenda.
- The AC asked for questions or comments.
- Commissioner Stebbins requested a condition for items numbered 8, 29-31 and 49.
- The AC thanked the town of Lee, MA for disclosing their impact costs.
- Commissioner Camargo moved to approve the roster of Adult-Use Renewals.
- Commissioner Concepcion seconded the motion.
 - The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the Adult-Use Renewals subject to the condition requested by Commissioner Stebbins by a vote of four in favor and zero opposed.

1. 311 Page Blvd Holding Group LLC (#MRR206515)
2. Alternative Therapies Group II, Inc. (#MRR206519)
3. Alternative Therapies Group II, Inc. (#MRR206522)
4. Alternative Therapies Group II, Inc. (#MRR206577)
5. ARL Healthcare Inc. (#MRR206516)
6. ARL Healthcare Inc. (#MPR244026)
7. ARL Healthcare Inc. (#MCR140545)
8. ARL Healthcare Inc. (#MRR206593)
 - Commissioner Stebbins requested a condition.
 - Proposed condition: Within five (5) business days of any change following the renewal application, and in accordance with 935 CMR 500.103 (4)(f) and 935 CMR 500.104 (5), the licensee shall submit updated and dated attestation of no response from Host Community or substantive response from Host Community.
9. B Leaf Wellness Centre LLC (#MRR206568)



10. Beacon Compassion, Inc. (#MRR206546)
11. BKPN LLC (#MRR206608)
12. Budega, Inc. (#MRR206591)
13. Bud's Goods & Provisions Corp. (#MCR140553)
14. Bud's Goods & Provisions Corp. (FKA Trichome Health Corp.) (#MRR206535)
15. Bud's Goods and Provisions, Corp. (#MPR244030)
16. Caroline's Cannabis, LLC (#MRR206563)
17. Cedar Roots LLC (#MPR244056)
18. Cedar Roots LLC (#MCR140580)
19. Cloud Creamery LLC (#MPR244058)
20. COASTAL CULTIVARS, INC. (#MCR140577)
21. Coyote Cannabis Corporation fka MRM Industries LLC (#MPR244042)
22. Curaleaf Massachusetts Inc (#MRR206573)
23. Curaleaf Massachusetts Inc (#MRR206572)
24. Deerfield Naturals, Inc. (#MRR206575)
25. Deerfield Naturals, Inc. (#MPR244043)
26. Deerfield Naturals, Inc. (#MCR140560)
27. East Boston Bloom, LLC (#MRR206471)
28. FFD Enterprises MA (#MRR206614)
29. FFD Enterprises MA, Inc. (#MRR206588)
 - Commissioner Stebbins requested a condition.
 - Proposed condition: Within five (5) business days of approval of the renewal application, and in accordance with 935 CMR 500.101(1)(a)(11) and 935 CMR 500.104(5), contact CCC Licensing Division with any updates to confirm Positive Impact Plan regarding targeted Areas of Disproportionate Impact.
30. FFD Enterprises MA, Inc. (#MPR244057)
 - Commissioner Stebbins requested a condition.
 - Proposed condition: Within five (5) business days of approval of the renewal application, and in accordance with 935 CMR 500.101(1)(a)(11) and 935 CMR 500.104(5), contact CCC Licensing Division with any updates to confirm Positive Impact Plan regarding targeted Areas of Disproportionate Impact.
31. FFD Enterprises MA, Inc. (#MCR140581)
 - Commissioner Stebbins requested a condition.
 - Proposed condition: Within five (5) business days of approval of the renewal application, and in accordance with 935 CMR 500.101(1)(a)(11) and 935 CMR 500.104(5), contact CCC Licensing Division with any updates to confirm Positive Impact Plan regarding targeted Areas of Disproportionate Impact.
32. Four Score Holdings LLC (#MRR206616)
33. Green Theory Cultivation, LLC (#MPR244024)
34. Green Theory Cultivation, LLC (#MCR140541)
35. Grow Rite, LLC (#MCR140571)
36. GTE Franklin LLC (#MRR206527)



37. H&H Cultivation LLC (#MCR140512)
38. Heal Sturbridge, Inc. (#MRR206582)
39. Highmark Provisions, LLC (#MCR140559)
40. Holistic Health Group Inc. (#MRR206587)
41. HOLYOKE 420 LLC (#MRR206602)
42. HVV Massachusetts, Inc. (#MCR140550)
43. HVV Massachusetts, Inc. (#MRR206576)
44. I.N.S.A., Inc. (#MRR206613)
45. I.N.S.A., Inc. (#MPR244059)
46. KG Collective LLC (#MRR206578)
47. LC Square, LLC. (#MCR140549)
48. Leaf Relief, Inc. (#MRR206615)
49. Liberty Market (#MRR206603)
 - Commissioner Stebbins requested a condition.
 - Proposed condition: Within five (5) business days of approval of the renewal application, and in accordance with 935 CMR 500.101(1)(c) 8k and 935 CMR 500.104(5), contact CCC Licensing Division with any updates to confirm your training and recruitment partners and eligibility to support your activities.
50. Local Roots NE Inc. (#MRR206551)
51. Local Roots NE, Inc. (#MRR206561)
52. Mass Wellspring LLC (#MRR206559)
53. Massachusetts Citizens for Social Equity LLC (#MRR206569)
54. Massachusetts Citizens for Social Equity LLC (#MRR206570)
55. Massbiology Technology, LLC (#MCR140569)
56. Massbiology Technology, LLC (#MPR244052)
57. MassGrow, LLC (#MPR244019)
58. MassGrow, LLC (#MCR140535)
59. MCR Labs, LLC (#ILR267927)
60. Mill Town Agriculture, LLC (#MCR140558)
61. Misty Mountain Shop, LLC (#MRR206586)
62. MRM Industries LLC (#MCR140564)
63. Nature's Medicines, Inc. (#MRR206555)
64. Nature's Medicines, Inc. (#MRR206554)
65. Nature's Medicines, Inc. (#MCR140554)
66. Nature's Medicines, Inc. (#MRR206556)
67. NEO Manufacturing MA LLC (#MCR140530)
68. NEO Manufacturing MA LLC (#MPR244034)
69. New England Treatment Access, LLC. (#MRR206525)
70. New England Treatment Access, LLC. (#MRR206544)
71. New England Treatment Access, LLC. (#MMRR206545)
72. New England Treatment Access, LLC. (#MPR244035)
73. New England Treatment Access, LLC. (#MCR140548)
74. Old Planters of Cape Ann, Inc. (#MRR206539)
75. Pharmacannis Massachusetts Inc. (#MRR206539)
76. Pineapple Express, LLC (#MDR272556)



77. Power Fund Operations (fka) Silver Therapeutics, Inc. (#MPR244045)
78. Pure Oasis LLC (#MRR206547)
79. Pure Oasis LLC (#MRR206564)
80. Sama Productions, LLC (#MCR140497)
81. SIRA NATURALS, INC. (#MCR140562)
82. SIRA NATURALS, INC. (#MCR140563)
83. Sira Naturals, Inc. (#MRR206468)
84. Sira Naturals, Inc. (#MCR140513)
85. Sira Naturals, Inc. (#MRR206476)
86. SIRA NATURALS, INC. (#MPR244039)
87. Sira Naturals, Inc. (#MRR206470)
88. Solar Therapeutics Inc. (#MRR206584)
89. Solar Therapeutics, Inc. (#MRR206585)
90. Stafford Green, Inc. (#MCR140534)
91. SunnyDayz Inc. (#MCR140567)
92. The Heirloom Collective, Inc. (#MPR244044)
93. The Heirloom Collective, Inc. (#MCR140568)
94. Theory Wellness Inc (#MRR206566)
95. Trifecta Farms Corp (#MPR244047)
96. Trifecta Farms Corp (#MCR140570)
97. UPROOT LLC (#MBR169320)
98. Xhale New England Dispensary LLC (#MRR206540)
99. Commonwealth Alternative Care, Inc. (#RMD1126)
100. Holistic Health Group, Inc. d/b/a Suncrafted (#RMD1566)
101. HVV Massachusetts, Inc. (#RMD1766)
102. I.N.S.A., Inc. (#RMD3362)
103. M3 Ventures, Inc. (#RMD465)
104. M3 Ventures, Inc. (#RMD806)
105. Mass Wellspring, LLC (#RMD665)
106. Nature's Medicines, Inc. (#RMD1045)
107. New England Treatment Access, LLC (#RMD3028)
108. Northeast Alternatives, Inc. (#RMD745)
109. Sira Naturals, Inc. (#RMD245)
110. Sira Naturals, Inc. (#RMD625)
111. Sira Naturals, Inc. (#RMD325)
112. The Heirloom Collective, Inc (#RMD825)
113. Theory Wellness, Inc. (#RMD525)

10) Staff Recommendations on Responsible Vendor Training – 05:20:15

1. DSBWorldwide, Inc. (#RVN454097)
 - Licensing Director Defoe presented the Staff Recommendation for Responsible Vendor Training.
 - The Chair asked for questions or comments.
 - Commissioner Concepcion moved to approve the Responsible Vendor Training.



- Commissioner Stebbins seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the Responsible Vendor Training License by a vote of four in favor and zero opposed.

11) Staff Recommendations on Responsible Vendor Training Renewals – 05:21:27

1. Medical Marijuana 411 (#RVR453141)

- Licensing Director Defoe presented the Staff Recommendation for the Denial of the Renewal License.
- The AC asked for questions or comments.
- Commissioner Stebbins moved to approve the Renewal License.
- Commissioner Camargo seconded the motion.
- The AC took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the Renewal License by a vote of four in favor and zero opposed.

12) Commission Discussion and Votes – 05:22:41

- Acting General Counsel Andrew Carter (AGC Carter) offered the periodic review of Executive Session minutes. He shared that the Legal department reviewed 17 sets of minutes not previously disclosed to the public. He recommended that the minutes continue to be withheld, as the purpose of the Executive Session remains in effect.
- October 8, 2020
 - AGC Carter disclosed that the Commission entered Executive Session under Purpose (7) of the Open Meeting Law, G.L., c. 30A § 21. He explained that in this session, the body discussed a matter subject to a second amended protective order and entered into *The United States v. Correia, et al.*
- November 19, 2020
 - AGC Carter disclosed that the Commission entered Executive Session under Purpose (7) of the Open Meeting Law, G.L., c. 30A § 21 to discuss a matter subject to the protective order involving Nature’s Medicine, Agricultural Healing, and Northeast Alternatives. He recommended that minutes continue to be withheld for the reasons stated.
- June 23, 2020 - present
 - AGC Carter disclosed that the Commission entered Executive Session 15 times under Purpose (9) of the Open Meeting Law, G.L., c. 30A § 21, which allows it to



confer with a mediator as defined in G.L., c. 233 § 23. He added that the Commission is relying on this purpose to develop a governance charter. He likewise recommended that the minutes continue to be withheld, as the governance charter is remains in progress.

- Commissioner Camargo moved to adopt the recommendation set forth in the Legal department's September 14, 2023, triannual review of Executive Session minutes memo.
- Commissioner Concepcion seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the motion by a vote of four in favor and zero opposed.

13) New Business Not Anticipated at the Time of Posting – 05:26:09

- No new items were identified.

14) Next Meeting Date – 05:26:17

- The AC noted that the next meetings would be on September 18 and 19, and, if needed, September 20, 2023. He explained that these meeting would be for the Commissioners to review draft regulations and make any necessary edits.
- The AC gave a tentative schedule for the remainder of the calendar year.

15) Adjournment – 05:30:57

- Commissioner Stebbins moved to adjourn.
- Commissioner Concepcion seconded the motion.
- The Chair took a roll call vote:
 - Commissioner Camargo – Yes
 - Commissioner Concepcion – Yes
 - Acting Chair Roy – Yes
 - Commissioner Stebbins – Yes
- The Commission approved the motion by a vote of four in favor and zero opposed.



Identifying Disproportionately Impacted Areas by Drug Prohibition in Massachusetts

March 2021

Massachusetts Cannabis Control Commission

Steven J. Hoffman, Chairman
Jennifer Flanagan, Commissioner
Nurys Z. Camargo, Commissioner
Bruce Stebbins, Commissioner
Ava C. Concepcion, Commissioner

Shawn Collins, Executive Director

Principal Investigators

Jennifer M. Whitehill, PhD, University of Massachusetts Amherst
Mark Melnik, PhD, University of Massachusetts Donahue Institute

Project Team

April Pattavina, PhD, University of Massachusetts Lowell
Renee M. Johnson, PhD, MPH, Johns Hopkins Bloomberg School of Public Health
Rebecca Loveland, MA, University of Massachusetts Donahue Institute
Carrie Bernstein, MPPA, University of Massachusetts Donahue Institute
Faith English, MPH, University of Massachusetts Amherst
Abigail Raisz, BA, University of Massachusetts Donahue Institute
Michael McNally, BA, University of Massachusetts Donahue Institute
Samantha M. Doonan, BA, Research Analyst, Massachusetts Cannabis Control Commission
Julie K. Johnson, PhD, Director of Research, Massachusetts Cannabis Control Commission

Acknowledgments

External Collaborators

University of Massachusetts Amherst
Jasmine Inim, BA

University of Massachusetts Donahue Institute
Andrew Hall, MPA, MA

Cannabis Control Commission

Commission Leadership

Alisa Stack, Chief Operating Officer

Research Department

Olivia Laramie, Research Project Coordinator

Government Affairs

Matthew Giancola, Director of Governmental Affairs and Policy

Suggested bibliographic reference format:

Whitehill JM., Melnik M., Pattavina A., Johnson RM., Loveland R., Bernstein C., English F., Raisz A., McNally, M., Doonan SM., & Johnson JK. (2021, February). *Identifying Massachusetts Communities Disproportionately Impacted by Drug Prohibition*. Worcester, MA: *Massachusetts Cannabis Control Commission*.

Table of Contents

I.	Executive Summary	4
	Table I-1. Municipalities in Tiers 1 and 2 (Top 20 Percent) of Disproportionate Impact Score	7
	Figure I-1. Disproportionate Impact Tiers for Census Tract in Massachusetts’ Five Largest Cities....	8
II.	Introduction.....	9
	Purpose.....	9
	History of Drug Enforcement	9
	Massachusetts Policy	10
III.	Methods.....	11
	Overview.....	11
	Data Sources and Time Frame	12
	Municipalities and Census Tracts	13
	Variables	13
	Data Exclusions	14
	Special Considerations.....	14
	Scoring.....	15
IV.	Results.....	16
	Figure IV-1. Massachusetts Municipalities by Disproportionate Impact Tier.....	16
	Table IV-1. Municipalities in Tiers 1 and 2 (Top 20 percent) of Disproportionate Impact Score, Ranking with Scores	17
	Census Tract Rankings	18
	Figure IV-2. Boston Census Tracts (within Neighborhoods) by Disproportionate Impact Tier.....	19
	Figure IV-3. Cambridge Census Tracts by Disproportionate Impact Tier.....	20
	Figure IV-4. Lowell Census Tracts by Disproportionate Impact Tier	21
	Figure IV-5. Springfield Census Tracts by Disproportionate Impact Tier	22
	Figure IV-6. Worcester Census Tracts by Disproportionate Impact Tier.....	23
	Table IV-2. Census Tracts in Tier 1 and 2 (Top 20 percent) of Disproportionate Impact Score.....	24
V.	Conclusion	26
	Limitations	26
	Directions for Future Research	27
	Policy Considerations	27
VI.	References.....	29
VII.	Appendices.....	30
	Appendix I. Detailed Study Design and Methods.....	30
	Table VII-1. Time spans and Corresponding Population Data Source(s).....	30
	Appendix II. Data.....	32
	Figure VII-1. Number of Municipalities Reporting to NIBRS, 1990-2017	32
	Table VII-2. Municipalities Excluded from Analysis.....	33
	Table VII-3. Census Tracts Excluded from Analysis	35
	Table VII-4. Point Locations Excluded from Analysis.....	36
	Table VII-5. Characteristics of Adults Arrested for Drug-Related Offenses in Massachusetts, 2000- 2017.....	37
	Table VII-6. Municipalities in Tiers 1 and 2 (Top 20%) of Disproportionate Impact Score, by County	38
	Table VII-7. Disproportionate Impact Scores and score components in Massachusetts by Municipality, 2000-2017.....	39



I. Executive Summary

Introduction

The Massachusetts Cannabis Control Commission (hereafter referred to as “the Commission”) is legislatively 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)). Accordingly, the purpose of this project was to: (1) develop a method to empirically assess the extent to which Massachusetts communities have been impacted historically by cannabis prohibition and the “War on Drugs;”^a (2) apply the method to generate a “disproportionate impact score” (“DI” score) that reflects those impacts for different areas of Massachusetts; and (3) provide a ranking of areas in Massachusetts according to the disproportionate impact score [See *Section III. Methods*].

Approach

Overview. To quantify the impact of cannabis prohibition and the “War on Drugs^a,” it was necessary to first conceptualize how this could be measured using available data. Prior research demonstrates that enforcement of drug prohibition has resulted in disproportionately high numbers of arrests and incarceration for Black and Latino^b individuals.¹ These disparities persist despite cannabis decriminalization in Massachusetts in 2008, medical legalization in 2012, and adult-use legalization in 2016.² There are strong correlations between poverty and involvement in drug selling and/or drug use; and after incarceration, many individuals face steep challenges to gaining legal employment, which can set up cycles of poverty that last generations.³ The disproportionate impact (DI) score, therefore, included four primary factors at a geographic-level: Drug arrests, including: (1) average annual number of drug arrests; and (2) average annual rate of drug arrests per 100,000 population; (3) percent of people living in poverty (“economic deprivation”); and (4) the percent of residents who report Black and/or Latino race/ethnicity (“racial and ethnic composition”). These factors were examined for 295 municipalities across Massachusetts, as well as for 305 census tracts in the state’s five largest cities (Boston, Cambridge, Lowell, Springfield, and Worcester).

Data Sources. Arrest data for all incidents involving a drug crime were obtained from the National Incident-Based Reporting System (NIBRS) and the Boston Police Department (BPD) from January 1, 2000 through December 31, 2017 [See *Section II. Introduction—Massachusetts*

^aThe “War on Drugs” refers to punitive criminal sanctions for drug offenses and use of a harsh criminal justice approach in managing societal problems with drugs in the United States [See *Section II. Introduction. History of Drug Enforcement* for additional discussion and references].

^bRace and ethnicity data analyzed in this report come from the U.S. Census Bureau. The Census asks individuals if they are “Hispanic or Latino.” Hispanic or Latino individuals may be of any race. The term Latino is used in this report to refer to people who identify as Hispanic or Latino/a/x. The term Black is used to refer to individuals who identify as either “Black or African American” on the census and who do not identify as Hispanic or Latino.

Policy for additional information on NIBRS vs. the previously used Uniform Crime Reporting (UCR) data]. Arrests were assigned to the census tract in which they occurred. The year 2000 was selected as the starting point for this analysis as this was the first year that most Massachusetts municipalities reported to NIBRS [See Figure VI-1]. The ending year was selected so that the study assessed the time before Massachusetts implemented legal sales of cannabis for adult use. Municipalities (n=56) that did not have drug arrest data available in NIBRS or from BPD could not be included in the analysis [See: *Section III. Methods. Data Sources and Time Frame* for more detail].

Score Development. Four key indicators were used in an equation^c that assigned a disproportionate impact (DI) score to each area. Municipalities and/or census tracts were scored separately. These indicators were calculated at the area level and included: (1) average annual number of drug arrests; (2) average annual rate of drug arrests per 100,000 population; (3) percent of people living in poverty; and (4) the percent of residents who report Black and/or Latino race/ethnicity.

To account for the fact that some areas have consistently high levels of arrests, poverty, and Black and/or Latino residents over time while other areas have experienced more changes in these indicators, the study period was divided into four time spans.^d The scoring equation was applied to generate a DI^e score and a ranking for each place in each time span. The average of the four rankings^e was calculated to create a final DI score. The final DI scores range from zero to 99.52, with higher scores representing higher impacts. This final DI score was again ranked to identify the most disproportionately impacted areas in Massachusetts according to the score. Municipalities with a high concentration of college students (n=5) or of seasonal housing (n=7) were excluded from the final ranking because the population and arrest data for such areas is unlikely to represent year-round residents. [See *Table VI-2*]. The five largest cities were excluded from the municipality rankings because they are analyzed separately at the census tract level.

Results

There were 279 municipalities included in the municipal-level ranking. Table I-1 below splits the areas with the highest DI scores into two tiers. Tier 1 includes the 28 cities and towns in the top 10 percent of DI scores (range: 78.7 to 99.5). The three highest scoring communities were Holyoke, New Bedford, and Brockton. Tier 2 includes the next 28 municipalities which fell into the top 11-20 percent of DI scores (range: 69.6-78.6). Tier 2 includes places such as Weymouth, Dennis, and Methuen. Each tier after that contains approximately 56 areas that represent 20

^cThe DI scores in this analysis were calculated using rankings for the following measures and in the following equation: $(0.5) * \text{Average Annual Number of Drug Arrests} + \text{Average Annual Rate of Drug Arrests per 100,000 population} + (0.5) * \text{Percent of people living in poverty} + (0.5) * \text{Percent of Black and/or Latino residents}$.

^dThe time spans used for the analysis were: 2000-2004, 2005-2009, 2010-2014, and 2015-2017.

^eDI scores and ranking for each time period were based on the number of municipalities or census tracts reporting arrest data, which varied over time, from n=246 in 2000-2004 to n=295 in 2015-2017. These ranking were converted to percentages before being averaged across the time spans in which an area reported drug arrests.

percent of ranked municipalities. Tier 6 can be thought of as those communities least negatively impacted by drug enforcement and the bottom 20 percent of DI scores (range: 6.2-30.1).

The median traits in 2015-2017 for a municipality in Tier 1 (the top 10 percent) include: 88 average (mean) annual arrests, 308 average annual arrests per 100,000 population, 15 percent living below the federal poverty line, and 23 percent Black and/or Latino residents. The median municipality in Tier 2 (with a score in the 11th to 20th percentile) had: 50 average annual arrests, 226 average annual arrests per 100,000 population, eight percent living below the federal poverty line, and six percent Black and/or Latino residents. By comparison, municipalities in the bottom tier had two average annual arrests, 32 average annual arrests per 100,000 population, four percent living below the federal poverty line, and two percent Black and/or Latino residents.

The DI score tiers for 305 census tracts within the five largest cities are presented in Figure I-1. Boston, Springfield, and Worcester had census tracts that fall within the Tier 1 on the DI score.

Conclusion

This analysis identifies Massachusetts municipalities and specific census tracts within the five largest cities that have experienced high levels of drug arrests, compounded by poverty and racial segregation, and thus disproportionately experienced negative impacts from drug prohibition and enforcement. The areas in the top tiers on both the municipality and census tract rankings are the most disproportionately impacted areas. Because the DI score for each area is calculated using rankings that are relative to other areas in Massachusetts, places further down on the list may have been impacted, but to a lesser degree.

It is notable, if not surprising, that a majority of municipalities on the current list of Disproportionately Impacted Areas^f maintained by the Commission⁴ fall into Tiers 1 and 2 based on the DI score created in this analysis. Further, many municipalities in Tier 1 are legislatively recognized on the state level as “Gateway Cities.” Gateway Cities are midsized urban centers that serve as regional economic anchors and face a variety of social and economic challenges.⁵

Given the nature of the DI scores (*i.e., communities with higher scores are “more impacted” than communities with lower scores*), it may be appropriate for the Commission to consider using different strategies to attempt to address and ameliorate the impacts of drug enforcement on areas in different tiers (or other groupings of areas) on this list. Such an approach would reflect the reality that in Tier 1, residents are more likely to have experienced negative impacts from drug enforcement; whereas in lower tiers, it is most likely to be a subset of people who have such experiences. Eligibility for priority license status and other benefits could be based on a combination of requirements such as residence in a Tier 2 Disproportionately Impacted Area (DIA) and membership in an additional priority group (*e.g., personal or family history of drug arrest or incarceration; Black race and/or Latino ethnicity*).

^f The Commission has previously referred to areas disproportionately impacted by drug prohibition as “Areas of Disproportionate Impact” or “ADIs.” Since the abbreviation ADI is also used in several fields to refer to a measure of economic deprivation called the Area Deprivation Index (ADI), this report utilizes the term Disproportionately Impacted Areas and the abbreviation DIA. See Section II: Introduction, *Massachusetts Policy* for more detail.

It should be noted that disproportionate impacts of drug enforcement occur alongside and interact with other economic and social problems (*e.g., slow job growth and poor-quality schools*). With that, thoughtful and strategic utilization of the DI score for policymaking can help improve social equity within the cannabis industry, and hopefully, in communities that have long-faced social and economic challenges in the Commonwealth.

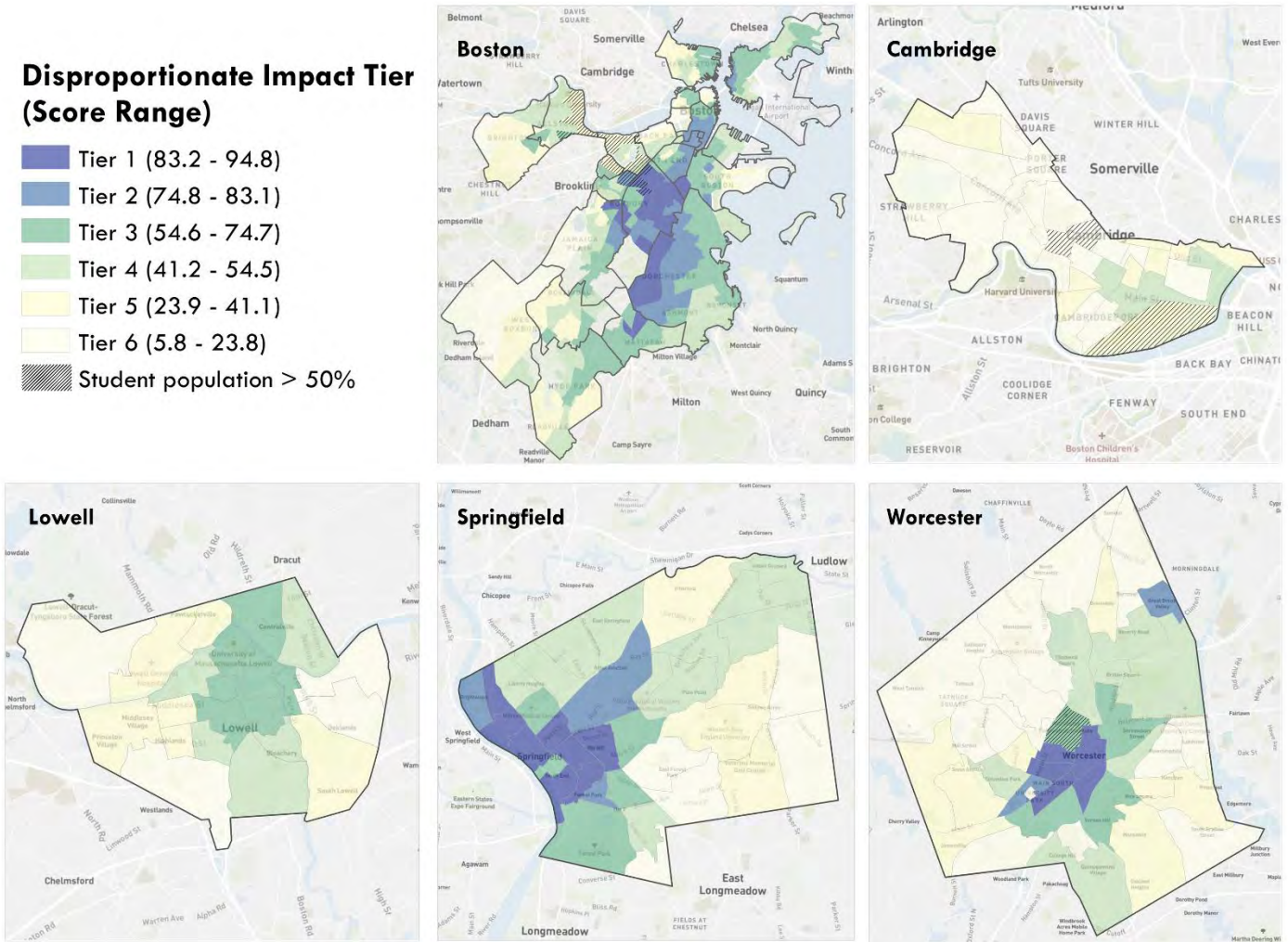
Table I-1. Municipalities in Tiers 1 and 2 (Top 20 Percent) of Disproportionate Impact Score

Tier 1		Tier 2	
Rank	Municipality	Rank	Municipality
1	Holyoke*	29	Weymouth
2	New Bedford*	30	Dennis
3	Brockton*	31	Methuen
4	Lynn*	32	Spencer*
5	Fall River*	33	Stoughton
6	Salem	34	Peabody
7	Chelsea*	35	Wareham*
8	Fitchburg*	36	Yarmouth
9	Southbridge*	37	Palmer
10	Haverhill*	38	Somerville
11	Pittsfield*	39	Plymouth
12	West Springfield*	40	Braintree*
13	Greenfield*	41	Middleborough
14	Taunton*	42	Mashpee
15	Revere*	43	Medford
16	Barnstable	44	Salisbury
17	Everett	45	Woburn
18	Webster	46	Beverly
19	Northampton	47	Marlborough
20	Chicopee	48	Westfield
21	Quincy*	49	Oak Bluffs
22	Gardner	50	Norwood
23	Leominster	51	Montague
24	Randolph*	52	Sturbridge
25	Malden	53	Andover
26	Attleboro	54	Raynham
27	North Adams*	55	Agawam
28	Falmouth	56	Truro

Note: See Table VI-7 for full list of rankings and scores. Disproportionate impact scores ranged from 78.67-99.52 in Tier 1 (top 10%) and 69.56-78.66 (top 11% to 20%) in Tier 2. Tiers were created for 279 cities and towns, after excluding the five largest cities and 9 other municipalities with high student enrollment or seasonality [See Table VI-2 for exclusions].

Municipalities with an asterisk (*) denote those that were included on the Commission’s 2017 list of Disproportionately Impacted Areas (DIAs).⁴

Figure I-1. Disproportionate Impact Tiers for Census Tract in Massachusetts' Five Largest Cities



Note: Further detail on census tracts (and alignment with neighborhoods for Boston only) can be found in *Table IV-2* and *Figures IV-2* through *IV-6*.

See *Appendix II. Data. Table VI-7* for DI scores and components for all Massachusetts Municipalities, 2000-2017.

II. Introduction

Purpose

The Commission is legislatively 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)). Accordingly, the purpose of this project was to: (1) Develop a method to empirically assess the extent to which Massachusetts communities have been impacted historically by cannabis prohibition and the “War on Drugs;”^a (2) apply the method to generate a “disproportionate impact score” (“DI” score) that reflects those different impacts for different areas of Massachusetts; and (3) provide a ranking of areas in Massachusetts according to the disproportionate impact (DI) score. [See *Section III. Methods*].

History of Drug Enforcement

In the 1960s, there was growing public recognition that alcohol and drug use had become a substantial problem in the United States (U.S.). As part of the 91st U.S. Congress’ Title II of the Comprehensive Drug Abuse Prevention and Control Act of 1970, Congress passed the Controlled Substances Act and President Nixon signed it into law. This statute ushered in a new approach to regulating substances and setting a framework for drug offenses. It created five drug schedules with the designations designed to be made after scientific review of the abuse liability and potential for medical use.^{6,7} While Schedule 5 drugs have low addictive potential and established medical uses, Schedule 1 drugs are those considered to have no accepted medical uses and high potential for dependency. Cannabis was designated as a Schedule 1 drug placing it “among the most dangerous drugs, with no medical use and high potential for abuse.” Although this Federal Schedule 1 designation was controversial at the time and continues to be contested, it remains in place.^{8,9}

In June of 1971, Nixon officially declared a “War on Drugs.” This campaign aimed to stop illegal drug use and distribution, but had adverse effects on communities of color (“disproportionate impact”). The campaign increased funding for drug-control agencies and created a mandatory prison sentencing for drug crimes. This prison reform led to a disproportionate incarceration rate of people of color for drugs crimes. Many believe this was the intended effect of the “War on Drugs.”

In the 1980s, President Reagan leaned into the Nixon era drug policies and took on a “Law and Order” approach to the nation’s perceived drug problem. The Anti-Drug Abuse Acts of 1986 and 1988 established punitive criminal sanctions for drug charges including new mandatory minimum sentences for offenses related to most drugs, including cannabis. During the Reagan Administration, drug users were targeted by law enforcement via drug possession charges. Drug



control practices targeted Black men in low-income, urban areas leading to a dramatic increase (“disproportionate impact”) in the proportion of Black people under correctional control. While some “War on Drugs” and “Law and Order” policies have been discontinued, they have affected many systems and social structures in the U.S., leaving a legacy of impacts that persist through the present day.¹

Massachusetts Policy

Massachusetts instituted cannabis decriminalization in January 2009. Although the number of arrests for cannabis possession dropped precipitously in subsequent years, racial disparities in cannabis possession arrests persisted.² The Massachusetts legislature legalized cannabis for medical use in 2012 and dispensaries first opened in 2015. Further, Massachusetts legalized cannabis for adult use in late 2016 and the regulated retail market became operational in Fall 2018. Despite these policy changes, data shows that law enforcement patrol urban minority neighborhoods more aggressively than suburban areas, where fewer people of color reside.¹⁰ People of color, and Black males in particular, experience disproportionate law enforcement contact, arrests, and incarcerations related to drug offenses.¹¹

As part of its mandate to address the harms from cannabis prohibition, the Commission provides certain benefits to geographic communities (“areas”) designated as disproportionately impacted (DIAs). For example, under current regulations, individuals who have resided for five of the past 10 years within a DIA are eligible for certain benefits, such as participation in the skill-based Social Equity Program from the Commission. Additionally, Positive Impact Plans developed by cannabis businesses can seek to invest resources in areas on the DIA list.

A prior study for the Commission led by Dr. Gettman analyzed arrest rates in relation to population size, percent of families below the poverty line, and employment rates, and used these indicators to establish a ranking for 160 municipalities in Massachusetts and census tracts in Boston, Worcester, Springfield, and Lowell using Uniform Crime Reporting (UCR) data.⁴ This study informed the Commission’s original DIA list. The current study sought to expand the analysis of DIAs to include most of the 351 cities and towns in Massachusetts, and a census tract analysis for all of the cities with over 100,000 residents in the state, and to use additional drug arrest and sociodemographic data. The present study further extends the previous analysis through its use of a more comprehensive law enforcement dataset (*i.e.*, *National Incident-Based Reporting System [NIBRS] vs. Uniform Crime Reporting*) and creates a new, empirical approach to identifying communities most impacted by drug enforcement.



III. Methods

Overview

Drawing on prior research, the study team developed a method to quantify the impact of the “War on Drugs” on geographic areas in Massachusetts using arrest, socioeconomic, and demographic data. Critical to this analysis was identifying data that was available at a fine-enough geographic scale to allow analysis at the municipal (*i.e., city or town*) level and at the census tract level for the largest cities.

The methodological approach was based on well-established data attesting that arrest and incarceration have negative impacts on individual health, social, and financial well-being, as well as adverse effects for families and communities.³ Additionally, enforcement of drug prohibition has resulted in disproportionately high numbers of arrest and incarceration for Black and Latino individuals.¹ These disparities persist despite the Commonwealth’s changing cannabis policies, including cannabis decriminalization, followed by medicinal and adult-use legalization.² Because of this situation, it was important to account for the fact that Black and Latino persons experience race-based disparities in drug-related stops, searches, and arrests in the methodology. Further, regardless of race, there are strong correlations between poverty and involvement in drug selling and/or drug use, and after incarceration, many individuals face steep challenges to gain legal employment which can establish cycles of poverty that last generations.³ Taking these factors into account, the disproportionate impact (DI) score was based on a four-pronged approach that measured: (1) average annual number of drug arrests; (2) average annual rate of drug arrests per 100,000 population; (3) percent of people living in poverty; and (4) the percent of residents who report Black and/or Latino race/ethnicity. These three abovementioned factors were examined for 295 municipalities across Massachusetts as well as for the 305 census tracts in the state’s five largest cities (Boston, Cambridge, Lowell, Springfield, and Worcester).

The locations with the highest DI scores are the most disproportionately impacted by drug policy enforcement. These represent areas where the average annual number of drug arrests and rate of drug arrests per 100,000 persons are the highest, and the impact of these arrests likely compounded by high levels of poverty and larger proportions of Black and Latino residents. Conversely, the lowest scoring areas were places with low levels of arrests, low poverty, and a smaller proportion of Black and Latino residents. These can be thought of as areas that have experienced fewer negative impacts from drug enforcement.[§]

[§]It is important to reinforce that the DI scores in this study are relative to other areas in Massachusetts. A low DI score does not indicate that the area or the people residing in that area have experienced no impact from drug enforcement and the other measures that went into the DI score measure.

Data Sources and Time Frame

Drug arrest data from the NIBRS¹² were obtained from the Massachusetts Executive Office of Public Safety and Security (EOPSS). Starting in the 1980s, the Federal Bureau of Investigation (FBI) began implementing the NIBRS program in law enforcement agencies across the U.S. This program requires participating law enforcement agencies to collect incident-level data on offenses reported to the police. In Massachusetts, law enforcement agencies serving municipalities submit these data points to a state repository and the state repository submits the data to the FBI. It is a voluntary reporting program and adoption among law enforcement agencies has been slow.

The overall study period was 2000-2017. By the end of 2000, over half of Massachusetts municipalities (n=183) reported to NIBRS, making 2000 an adequate starting point for the study. The ending year of 2017 was selected to have a “baseline” DI score before Massachusetts implemented legal sales of cannabis for adult use. As of 2017, there were 55 Massachusetts towns that did not contribute to NIBRS¹² and thus could not be included in this analysis [See *Table VI-2*]. In general, these are small municipalities with a population size under 8,000 residents, but there is one notable exception: the city of Lawrence (pop. 80,028). Lawrence is a large Gateway City⁵ with significant economic challenges (11 percent unemployed and 24 percent under the poverty line in 2017), with over 80 percent of the population of Latino ethnicity. One municipality had zero recorded drug arrests during the study period and was also not included. The city of Boston did not report to NIBRS during the study period, thus, data for Boston were procured separately from the Boston Police Department (BPD).

To identify areas that consistently had high DI scores according to our measure, acknowledge variation in arrests, demographic, and socioeconomic patterns over time, and reduce the influence of outliers, the 18-year period was broken into smaller time spans. Three five-year spans (2000-2004, 2005-2009, and 2010-2014) were used and the last time span covered three years (2015-2017).

For demographic and socioeconomic data, the current research leveraged the U.S. Census Bureau’s Decennial Census and American Community Survey (ACS), specifically the 2000 Census, and two ACS five-year databases. The ACS is an annual, sample-based survey of American households. The five-year version of the ACS pools together responses from five years of these surveys to create estimates. The five-year version of the ACS is preferable to the one-year version for this study because the pooled sample size allows for data to be released for all cities and towns in the Commonwealth. One-year ACS data are only released for cities and towns with populations of 65,000 or more, which would have severely limited the number of communities that could be analyzed for this study. Appendix Table VI-1 shows the study time spans for arrest data and the year(s) of the corresponding Census and/or ACS data used for analysis.



Municipalities and Census Tracts

All municipalities in Massachusetts with available drug arrest data were included in our analysis. Municipalities were defined according to the U.S. Census Bureau's city/town areas (CTA) designations. Larger cities can often be very complex, with wide variability in racial and socioeconomic composition and in law enforcement activity from neighborhood-to-neighborhood. This analysis, therefore, assessed trends at a census tract level for the five cities in the state with over 100,000 residents (Boston, Cambridge, Lowell, Springfield, and Worcester). Thus, the geographic areas in our analysis include both municipalities and census tracts within the five largest municipalities. Law enforcement agency data and population data was linked to the geographic area, either at the municipality or census tract level.

Variables

- *Number of drug-related arrests:* Average (mean) annual counts of drug-related arrests were computed using NIRBS and BPD data. This included all incidents when a drug offense was involved. This was calculated for each distinct geographic unit (*i.e., city/town or census tract*) based on the number of months that the area reported to NIBRS in each analytical period and then multiplied to represent an annual count. For example, if a town began reporting to NIBRS in January of 2001, the total number of arrests for that area in the period 2000 to 2004 would be divided by 48 months rather than 60 months (*i.e., five years*) and multiplied by 12. This approach allowed comparability across areas that started reporting to NIBRS at different times.
- *Rate of drug-related arrests per 100,000 residents:* The average annual count of drug arrests within an area was divided by the number of adult residents in that area to create a rate per 100,000 population.
- *Percent of Black^h and/or Latinoⁱ residents:* The U.S. Census and ACS data provide estimates of the population demographic composition with the following racial categories: Black or African American, white, American Indian or Alaska Native (AI/AN), Asian, Native Hawaiian or Other Pacific Islander. Ethnicity categories are Hispanic or Latino or non-Hispanic or Latino. The study assessed the proportion of residents in each area that fall into these categories and calculated the share of adults over age 18 who are Black and/or Latino.
- *Poverty status:* Poverty was measured by the percent of persons below the federal poverty level within a geographic unit (*e.g., city/town, census tract, etc.*).

^hThe term Black is used to report non-Hispanic or Latino persons who identify as either “Black or African American.”

ⁱThe term Latino is used in this report to refer to people who identify as Hispanic or Latino/a/x. Ethnicity data analyzed in this report comes from the U.S. Census Bureau which asks individuals if they are “Hispanic or Latino.” Hispanic or Latino individuals may be of any race.

Data Exclusions

This analysis sought to draw conclusions about the people who reside in a certain place being disproportionately impacted by drug policy enforcement. The arrest data obtained from NIBRS and BPD contained addresses for arrests and, due to privacy reasons, did not contain information about the residential address for arrested individuals. It is therefore necessary to assume that the arrest data reflects arrests of residents of a particular area, rather than people moving through that area. To improve the validity of this assumption, arrests (n=5,042) that occurred at certain locations that were unlikely to represent residents were excluded [See *Table VI-4*]. Arrests that met one of the following geographic criteria were excluded:

- 1) Arrest occurred in a census tract that does not reflect a residential area: parks (e.g., *Boston Common*), water (e.g., *Boston Harbor*), other tracts with fewer than 1,000 residents (e.g., *Suffolk Downs and Irving Oil industrial area*);
- 2) Arrest occurred at a geographic point (i.e., *addresses*) within the five largest cities that likely does not reflect a residential location. Specifically, arrests recorded at: the address of police headquarters (HQ) or substations, major transit hubs (e.g., *at the exact address of South Station*), five specific “suspected drug use/trafficking hubs” without residents (e.g., *Xfinity Center in Mansfield, South Shore Plaza Mall in Braintree*) that accounted for more than 20% of a municipality’s total arrest count;
- 3) Arrests from the five largest cities for which the address could not be mapped to a unique point (e.g., *due to a street name that does not exist*); and
- 4) Arrests that from the five largest cities for which the address, when mapped, was outside of the agency’s jurisdiction (e.g., *an arrest made by the Springfield Police Department in Chicopee*).

Special Considerations

Places with high numbers of undergraduate and graduate students

In communities with large student populations, typically college and university towns, the poverty rate can be inflated, thus, not be an accurate measure of economic deprivation in an area. For example, between 2015 and 2017, the town of Amherst had the highest poverty rate in Massachusetts at 33 percent. Comparatively, the poverty rates of cities such as Springfield and Holyoke were just below 30 percent in that same period. While the poverty rate is similar between these communities, the economic realities of these places are quite different. To account for this, the study examined the percentage of residents for each geographic area that were enrolled in college (undergraduate or graduate), with the aim of separating permanent resident poverty from student-driven poverty. Similarly, places with a high concentration of students may also be subject to higher levels of non-resident arrests. A place was defined as having a high number of students if enrolled students made up 20 percent of the population in a municipality or 50 percent of the population of a census tract, based on data for the latest time span. Areas that fit the criteria (five municipalities and 15 census tracts) were identified and omitted from the final rankings [See *Table VI-2* for list of excluded municipalities and *Table VI-3* for a list of excluded census tracts].



Seasonal housing

Areas with high concentrations of seasonal housing and high levels of seasonal arrests were also identified and removed from the final rankings (n=7) [See *Table VI-2*]. This was done to account for communities that may have seasonal spikes in non-resident arrests. Places with high levels of seasonal housing were defined as those with 25 percent or more of the housing stock as seasonal (based on the percentage of vacant housing units used for seasonal, recreational, or occasional use) and where 40 percent or more of arrests were in one specific season (winter; spring; summer or fall) across the study period. As an example, two towns excluded from rankings via this method were Nantucket and Provincetown.

Scoring

The four variables listed above were calculated for all areas with arrest data within a specific time span, treating municipalities and census tracts separately. Next, the areas were ranked according to each measure, separately, with higher values reflecting more impacted areas. The rankings were then combined using the following equation in order to generate a DI score for each time period:

$(0.5) * \text{average annual number of drug arrests} + \text{average annual rate of drug arrests per 100,000 population} + (0.5) * \text{percent of people living in poverty} + (0.5) * \text{percent of residents who are Black and/or Latino}.$

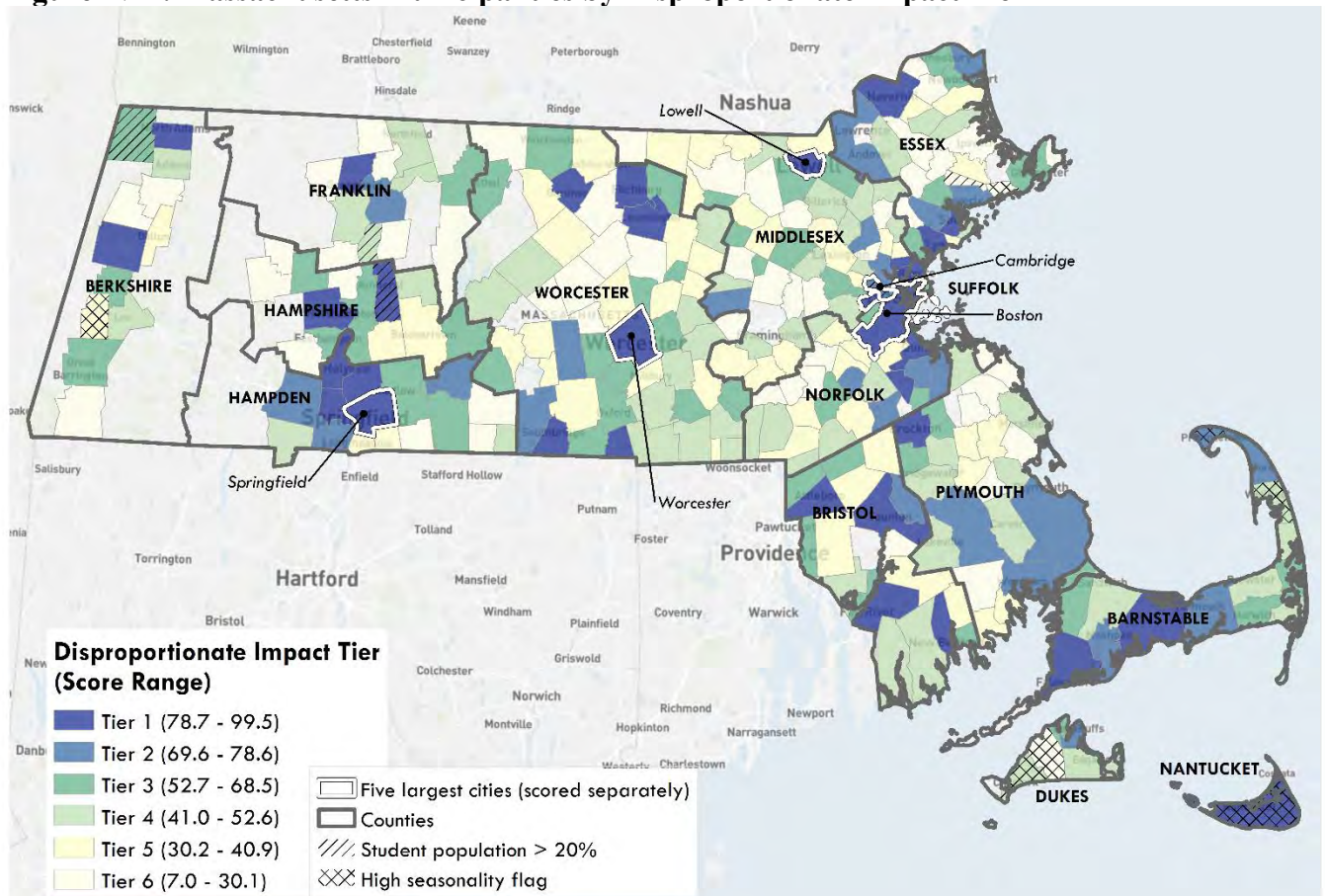
The DI scores for each time span were converted to a percentile and averaged together across the time spans with arrest data to compile the final score.

IV. Results

Municipality Rankings

This analysis shows that there are communities that have been heavily impacted by drug policing all around the Commonwealth [See *Figure IV-1*]. Table IV-1 shows a list of the municipalities that fell within the top 20 percent of highest scores on the disproportionate impact score measure. Tier 1 represents the 28 communities in the top 10 percent and Tier 2 represents the areas that comprised the upper 11 to 20 percent. Excluding the five largest cities in Massachusetts, the municipalities that ranked the highest on the DI score were Holyoke, New Bedford, and Brockton. The cities of Boston, Cambridge, Lowell, Springfield, and Worcester all have DI scores that would fall within the upper 20 percent, but they have been removed from this list since they were analyzed separately at the census tract level.

Figure IV-1. Massachusetts Municipalities by Disproportionate Impact Tier



Note: See *Appendix II. Data. Table VI-7* for DI scores and components for all Massachusetts Municipalities, 2000-2017 and *Appendix II. Data. Table VI-8* for DI scores and components for all Census Tracts of large Massachusetts cities, 2000-2017.



Table IV-1. Municipalities in Tiers 1 and 2 (Top 20 percent) of Disproportionate Impact Score, Ranking with Scores

DI Rank	Municipality	County	DI Score	DI Score Tier	On prior DIA list?
1	Holyoke*	Hampden	99.52	Tier 1	Yes
N/A	Springfield*	Hampden	98.62	Not ranked	Yes
N/A	Boston	Suffolk	98.39	Not ranked	Yes
2	New Bedford*	Bristol	98.02	Tier 1	Yes
N/A	Worcester*	Worcester	97.87	Not ranked	Yes
3	Brockton*	Plymouth	96.55	Tier 1	Yes
4	Lynn*	Essex	95.53	Tier 1	No
5	Fall River*	Bristol	94.78	Tier 1	Yes
6	Salem*	Essex	93.23	Tier 1	No
7	Chelsea*	Suffolk	92.76	Tier 1	Yes
N/A	Lowell*	Middlesex	92.66	Not ranked	No
8	Fitchburg*	Worcester	92.33	Tier 1	Yes
N/A	Amherst	Hampshire	90.82	Not ranked	Yes
9	Southbridge	Worcester	90.13	Tier 1	Yes
10	Haverhill*	Essex	88.80	Tier 1	Yes
11	Pittsfield*	Berkshire	88.58	Tier 1	Yes
12	West Springfield	Hampden	88.56	Tier 1	Yes
13	Greenfield	Franklin	88.42	Tier 1	Yes
14	Taunton*	Bristol	87.62	Tier 1	Yes
15	Revere*	Suffolk	87.30	Tier 1	Yes
16	Barnstable*	Barnstable	87.01	Tier 1	No
17	Everett*	Middlesex	86.66	Tier 1	No
18	Webster	Worcester	85.66	Tier 1	No
19	Northampton	Hampshire	85.00	Tier 1	No
20	Chicopee*	Hampden	84.22	Tier 1	No
21	Quincy*	Norfolk	83.36	Tier 1	Yes
22	Gardner	Worcester	83.14	Tier 1	No
23	Leominster*	Worcester	82.70	Tier 1	No
N/A	Nantucket	Nantucket	81.69	Not ranked	No
24	Randolph	Norfolk	81.03	Tier 1	Yes
25	Malden*	Middlesex	80.42	Tier 1	No
26	Attleboro*	Bristol	80.33	Tier 1	No
27	North Adams	Berkshire	79.71	Tier 1	Yes
28	Falmouth	Barnstable	78.67	Tier 1	No
29	Weymouth	Norfolk	78.64	Tier 2	No
30	Dennis	Barnstable	78.24	Tier 2	No
31	Methuen*	Essex	78.01	Tier 2	No
32	Spencer	Worcester	77.53	Tier 2	Yes
33	Stoughton	Norfolk	77.14	Tier 2	No
34	Peabody*	Essex	77.07	Tier 2	No
35	Wareham	Plymouth	77.04	Tier 2	No
N/A	Provincetown	Barnstable	76.25	Not ranked	No
36	Yarmouth	Barnstable	76.16	Tier 2	No
37	Palmer	Hampden	75.91	Tier 2	No
38	Somerville	Middlesex	74.19	Tier 2	No
39	Plymouth	Plymouth	74.10	Tier 2	No
40	Braintree	Norfolk	73.78	Tier 2	Yes
41	Middleborough	Plymouth	73.61	Tier 2	No
42	Mashpee	Barnstable	73.55	Tier 2	No



DI Rank	Municipality	County	DI Score	DI Score Tier	On prior DIA list?
43	Medford	Middlesex	73.26	Tier 2	No
44	Salisbury	Essex	73.06	Tier 2	No
45	Woburn	Middlesex	72.61	Tier 2	No
46	Beverly	Essex	72.37	Tier 2	No
47	Marlborough	Middlesex	71.85	Tier 2	No
48	Westfield*	Hampden	71.63	Tier 2	No
49	Oak Bluffs	Dukes	71.60	Tier 2	No
50	Norwood	Norfolk	71.44	Tier 2	No
51	Montague	Franklin	71.43	Tier 2	No
<i>N/A</i>	<i>Cambridge</i>	<i>Middlesex</i>	<i>70.99</i>	<i>Not ranked</i>	<i>No</i>
52	Sturbridge	Worcester	70.88	Tier 2	No
53	Andover	Essex	70.76	Tier 2	No
54	Raynham	Bristol	70.15	Tier 2	No
55	Agawam	Hampden	69.81	Tier 2	No
56	Truro	Barnstable	69.57	Tier 2	No

Note: DI=Disproportionate impact. *Indicates Massachusetts legislature-defined Gateway City. Ten places with significant seasonal housing/arrests or 20% or more residents in undergraduate or graduate degree programs have been grayed out and italicized, as have the state's five largest cities. Tiers were created with these places excluded, and therefore reflect percentiles of 279 total cities and towns.

See *Appendix II. Data. Table VI-7* for DI scores and components for all Massachusetts Municipalities, 2000-2017 and *Appendix II. Data. Table VI-8* for DI scores and components for all Census Tracts of large Massachusetts cities, 2000-20017.

The median traits in 2015-2017 for a municipality in Tier 1 (the top 10 percent) include: 88 average (mean) annual arrests, 308 average annual arrests per 100,000 population, 15 percent living below the federal poverty line, and 23 percent Black and/or Latino residents. The median municipality in Tier 2 (with a score in the 11th to 20th percentile) had: 50 average annual arrests, 226 average annual arrests per 100,000 population, eight percent living below the federal poverty line, and six percent Black and/or Latino residents. By comparison, municipalities in the bottom Tier had two average annual arrests, 32 average annual arrests per 100,000 population, four percent living below the federal poverty line, and two percent Black and/or Latino residents.

Census Tract Rankings

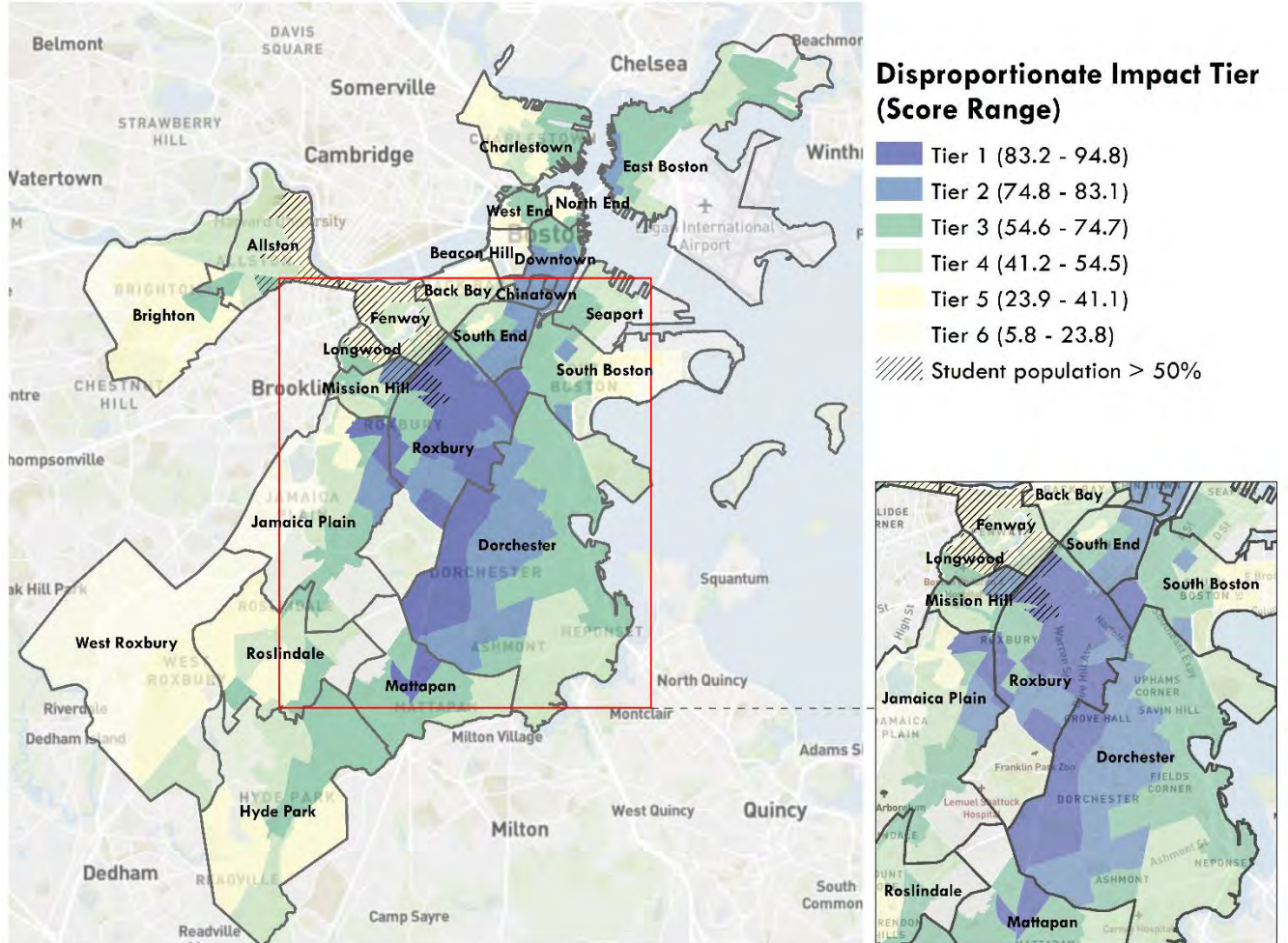
Six tiers that reflect the top 10 percent (Tier 1), top 11 to 20 percent (Tier 2), and 20 percent subsequent groupings were constructed based on the DI score distribution of all 305 census tracts across the state's five largest cities. The areas flagged for having high student enrollment were excluded from the final ranking, resulting in 297 total ranked census tracts.

All of Tier 1 and Tier 2 census tracts in the largest cities in Massachusetts are in Boston, Springfield, and Worcester. In Boston, the tracts with the highest DI scores include the neighborhoods of Roxbury and Dorchester. In Springfield, tracts with the highest DI scores were largely in and around the Metro Center, as well as the South End, Memorial Square, Old Hill, and Six Corners. In Worcester, high scoring tracts were also in and around Downtown, including: Lincoln and Federal Square, Piedmont, Green Island, as well as Great Brook Valley on the East Side. Both Lowell and Cambridge had areas with elevated DI scores, but overall,



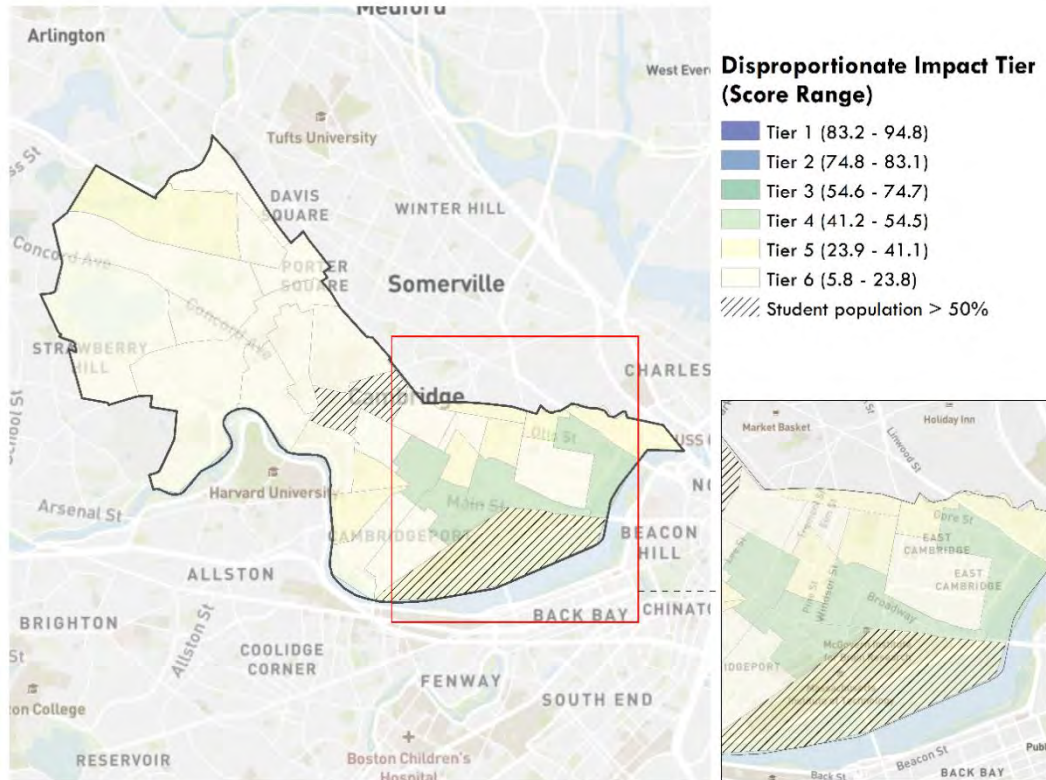
none of the tracts in these two cities rank among the most disproportionately impacted among the tracts in the largest cities of the state.

Figure IV-2. Boston Census Tracts (within Neighborhoods) by Disproportionate Impact Tier



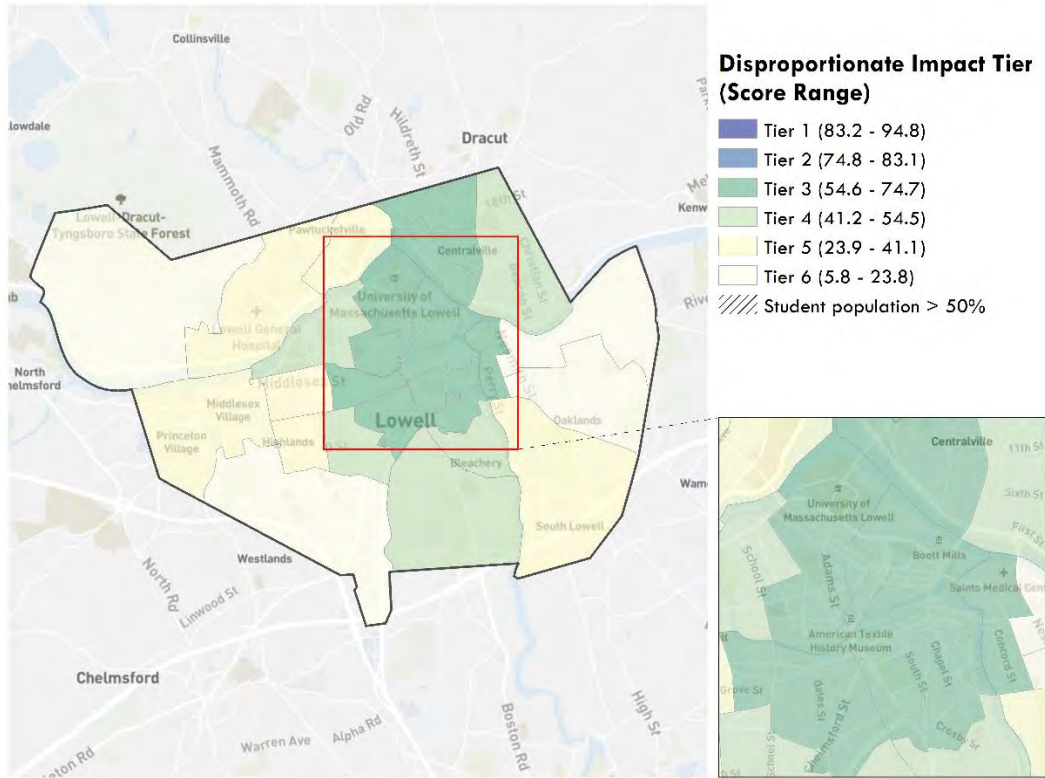
Note: See *Appendix II. Data. Table VI-7* for DI scores and components for all Massachusetts Municipalities, 2000-2017 and *Appendix II. Data. Table VI-8* for DI scores and components for all Census Tracts of large Massachusetts cities, 2000-2017.

Figure IV-3. Cambridge Census Tracts by Disproportionate Impact Tier



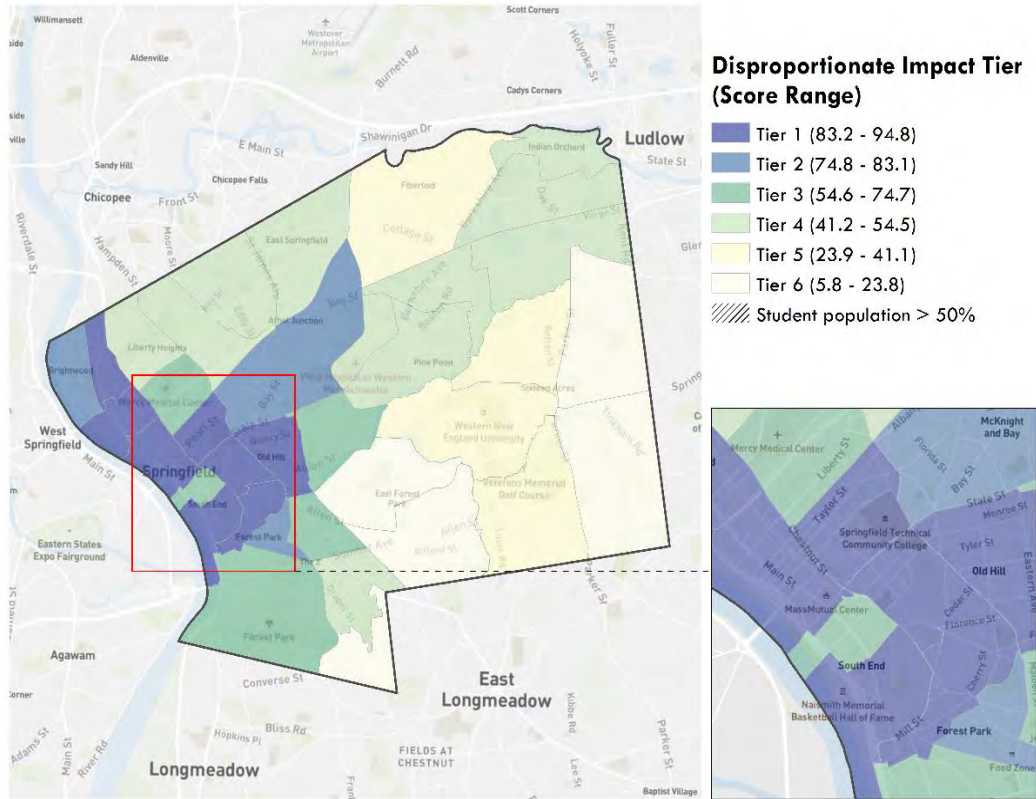
Note: See *Appendix II. Data. Table VI-7* for DI scores and components for all Massachusetts Municipalities, 2000-2017 and *Appendix II. Data. Table VI-8* for DI scores and components for all Census Tracts of large Massachusetts cities, 2000-2017.

Figure IV-4. Lowell Census Tracts by Disproportionate Impact Tier



Note: See *Appendix II. Data. Table VI-7* for DI scores and components for all Massachusetts Municipalities, 2000-2017 and *Appendix II. Data. Table VI-8* for DI scores and components for all Census Tracts of large Massachusetts cities, 2000-2017.

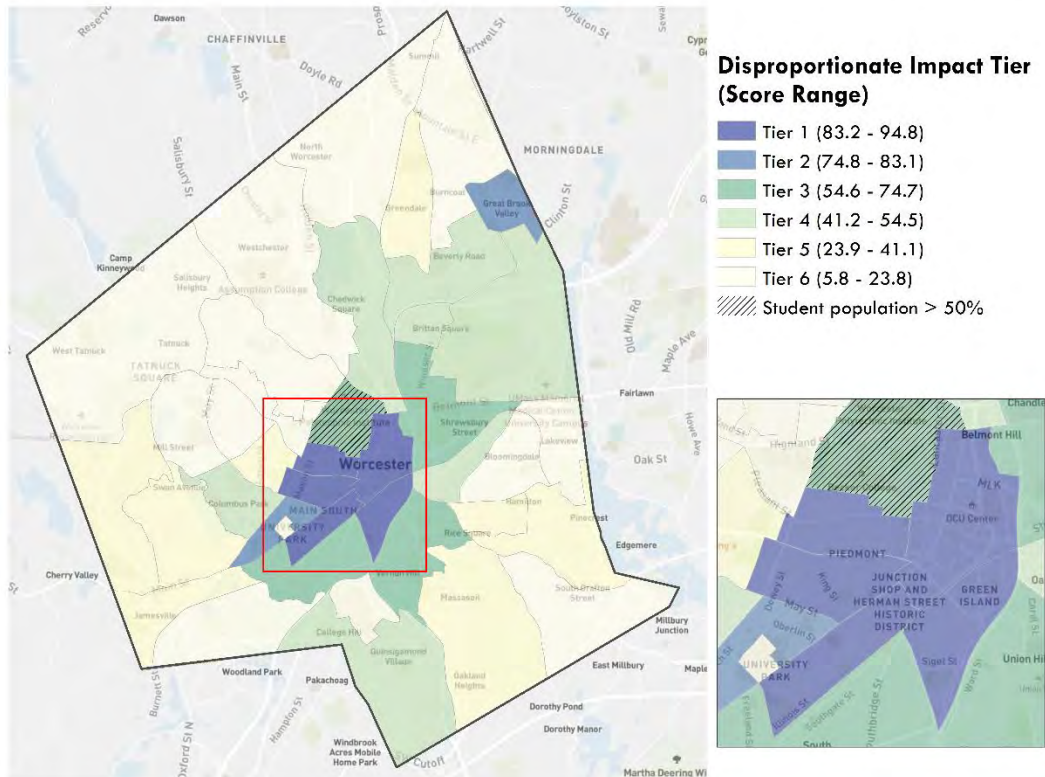
Figure IV-5. Springfield Census Tracts by Disproportionate Impact Tier



Note: See *Appendix II. Data. Table VI-7* for DI scores and components for all Massachusetts Municipalities, 2000-2017 and *Appendix II. Data. Table VI-8* for DI scores and components for all Census Tracts of large Massachusetts cities, 2000-2017.



Figure IV-6. Worcester Census Tracts by Disproportionate Impact Tier



Note: See *Appendix II. Data. Table VI-7* for DI scores and components for all Massachusetts Municipalities, 2000-2017 and *Appendix II. Data. Table VI-8* for DI scores and components for all Census Tracts of large Massachusetts cities, 2000-20017.



Table IV-2. Census Tracts in Tier 1 and 2 (Top 20 percent) of Disproportionate Impact Score

Rank	Tract Name	Municipality	Neighborhood (Boston only)	County	DI Score	DI Score Tier	On prior DIA list?
1	Census Tract 8020	Springfield		Hampden	94.81	Tier 1	Yes
2	Census Tract 804.01	Boston	Roxbury	Suffolk	94.15	Tier 1	Yes
3	Census Tract 8012	Springfield		Hampden	93.05	Tier 1	No
4	Census Tract 8006	Springfield		Hampden	92.53	Tier 1	Yes
5	Census Tract 805	Boston	Roxbury	Suffolk	92.38	Tier 1	Yes
6	Census Tract 7314	Worcester		Worcester	91.80	Tier 1	Yes
7	Census Tract 902	Boston	Dorchester	Suffolk	91.09	Tier 1	Yes
8	Census Tract 801	Boston	Roxbury & South Boston	Suffolk	90.99	Tier 1	No
9	Census Tract 7313	Worcester		Worcester	90.63	Tier 1	Yes
10	Census Tract 924	Boston	Dorchester	Suffolk	90.18	Tier 1	Yes
11	Census Tract 813	Boston	Roxbury & Jamaica Plain	Suffolk	89.91	Tier 1	No
12	Census Tract 803	Boston	Roxbury	Suffolk	89.80	Tier 1	Yes
13	Census Tract 7317	Worcester		Worcester	89.60	Tier 1	Yes
14	Census Tract 812	Boston	Jamaica Plain	Suffolk	89.50	Tier 1	No
15	Census Tract 903	Boston	Dorchester	Suffolk	88.90	Tier 1	Yes
16	Census Tract 8011.01	Springfield		Hampden	88.62	Tier 1	Yes
17	Census Tract 8018	Springfield		Hampden	87.99	Tier 1	Yes
18	Census Tract 817	Boston	Roxbury	Suffolk	87.71	Tier 1	Yes
19	Census Tract 1001	Boston	Dorchester	Suffolk	87.63	Tier 1	Yes
20	Census Tract 818	Boston	Roxbury	Suffolk	87.34	Tier 1	Yes
21	Census Tract 8019.01	Springfield		Hampden	87.30	Tier 1	No
22	Census Tract 901	Boston	Dorchester	Suffolk	87.24	Tier 1	Yes
23	Census Tract 7315	Worcester		Worcester	86.50	Tier 1	Yes
N/A	<i>Census Tract 806.01</i>	<i>Boston</i>	<i>Roxbury</i>	<i>Suffolk</i>	<i>86.49</i>	<i>Not ranked</i>	<i>Yes</i>
24	Census Tract 821	Boston	Roxbury	Suffolk	84.99	Tier 1	Yes
25	Census Tract 8019.02	Springfield		Hampden	84.88	Tier 1	Yes
26	Census Tract 904	Boston	Roxbury	Suffolk	84.61	Tier 1	Yes
27	Census Tract 8008	Springfield		Hampden	84.37	Tier 1	Yes
28	Census Tract 7325	Worcester		Worcester	83.82	Tier 1	No
29	Census Tract 1011.02	Boston	Mattapan	Suffolk	83.68	Tier 1	Yes
30	Census Tract 611.01	Boston	South Boston	Suffolk	82.81	Tier 2	Yes
31	Census Tract 920	Boston	Dorchester	Suffolk	82.78	Tier 2	Yes
32	Census Tract 913	Boston	Dorchester	Suffolk	82.37	Tier 2	No
33	Census Tract 923	Boston	Dorchester	Suffolk	82.14	Tier 2	Yes
34	Census Tract 503	Boston	East Boston	Suffolk	82.07	Tier 2	No
35	Census Tract 1002	Boston	Dorchester	Suffolk	81.81	Tier 2	Yes
36	Census Tract 711.01	Boston	Roxbury & South End	Suffolk	80.86	Tier 2	No
37	Census Tract 607	Boston	South Boston	Suffolk	80.50	Tier 2	Yes
38	Census Tract 712.01	Boston	South End	Suffolk	80.47	Tier 2	Yes
39	Census Tract 820	Boston	Roxbury	Suffolk	80.45	Tier 2	Yes



Rank	Tract Name	Municipality	Neighborhood (Boston only)	County	DI Score	DI Score Tier	On prior DIA list?
40	Census Tract 914	Boston	Dorchester	Suffolk	79.71	Tier 2	Yes
41	Census Tract 1005	Boston	Dorchester	Suffolk	79.67	Tier 2	No
42	Census Tract 916	Boston	Dorchester	Suffolk	79.65	Tier 2	No
43	Census Tract 819	Boston	Roxbury	Suffolk	79.58	Tier 2	Yes
44	Census Tract 8007	Springfield		Hampden	78.75	Tier 2	Yes
45	Census Tract 906	Boston	Roxbury	Suffolk	78.34	Tier 2	Yes
46	Census Tract 701.01	Boston	Downtown & Chinatown	Suffolk	77.84	Tier 2	No
47	Census Tract 8013	Springfield		Hampden	77.77	Tier 2	No
48	Census Tract 919	Boston	Dorchester	Suffolk	77.60	Tier 2	Yes
49	Census Tract 1203.01	Boston	Jamaica Plain	Suffolk	77.09	Tier 2	No
50	Census Tract 918	Boston	Dorchester	Suffolk	76.90	Tier 2	Yes
51	Census Tract 915	Boston	Dorchester	Suffolk	76.54	Tier 2	No
52	Census Tract 7320.01	Worcester		Worcester	76.39	Tier 2	No
53	Census Tract 917	Boston	Dorchester	Suffolk	76.39	Tier 2	Yes
<i>N/A</i>	<i>Census Tract 808.01</i>	<i>Boston</i>	<i>Mission Hill</i>	<i>Suffolk</i>	<i>76.32</i>	<i>Not ranked</i>	<i>Yes</i>
54	Census Tract 8022	Springfield		Hampden	76.23	Tier 2	Yes
55	Census Tract 8014.01	Springfield		Hampden	76.14	Tier 2	Yes
56	Census Tract 7312.03	Worcester		Worcester	76.00	Tier 2	Yes
57	Census Tract 704.02	Boston	South End	Suffolk	75.97	Tier 2	No
58	Census Tract 702	Boston	Downtown & Chinatown	Suffolk	75.16	Tier 2	Yes
59	Census Tract 1003	Boston	Dorchester	Suffolk	74.81	Tier 2	No

Note: 15 tracts grayed out and italicized had rates of high student enrollment (more than 50% of residents enrolled in undergraduate or graduate degree programs). Tiers were created with these places included. Boston neighborhoods are based on neighborhood definitions from the Boston Planning and Development Authority (BPDA).

See *Appendix II. Data. Table VI-7* for DI scores and components for all Massachusetts Municipalities, 2000-2017 and *Appendix II. Data. Table VI-8* for DI scores and components for all Census Tracts of large Massachusetts cities, 2000-20017.

V. Conclusion

This study used 18 years of drug arrest data as well as area-level socioeconomic and demographic data to generate a successive method for assessing the historical impact of cannabis prohibition and the “War on Drugs” to rank Massachusetts municipalities and census tracts according to this disproportionate impact (DI) score. This score identifies the DIAs in Massachusetts. The methodology extends prior efforts to rank Massachusetts areas by incorporating incident-level drug arrest data for most Massachusetts municipalities, and directly including race and ethnicity information in the scoring model.

It is notable that a majority of towns on the current list of DIAs⁴ maintained by the Commission fall in Tiers 1 and 2 based on the DI score created in this analysis. Further, many in Tier 1, in particular, are state legislatively recognized “Gateway Cities.” Gateway Cities are midsized urban centers that serve as regional economic anchors around the state and face a variety of significant social and economic challenges.⁵

Limitations

There are several limitations to this study summarized below. Additional detail can be found in the Appendix. First, the arrest data utilized in this study contained information on the address of an arrest and the law enforcement agency making the arrest (*i.e.*, *Boston Police Department*, *Amherst Police Department*). This study used the addresses of where the arrest took place to assign arrests to a geographic area; information on the residential address of the people who were arrested was not available. Thus, if individuals passing through or visiting an area were arrested in large numbers, it would inflate the count of arrests and the rate of arrests assigned to that area and would be utilized in the DI score. This was addressed by excluding certain locations (*e.g.*, *the Xfinity Center in Mansfield*), but that approach cannot fully account for non-residents being arrested in an area. Relatedly, some communities with elevated scores (*e.g.*, *Peabody*, *Marlborough*, and *Waltham*) are on major transit routes which could have resulted in a higher-than-expected number of arrests. There may be other towns with seasonal fluctuations in population (*e.g.*, *Falmouth and Truro*) that could have influenced how the town ranked with regard to arrests and poverty, but that did not meet the conservative criteria established for seasonality-based exclusions in this study [See *Section III. Methods, Other Considerations*].

Arrest data about juveniles under age 18 were not provided by the BPD. To maintain comparability across the state, juveniles were excluded from the NIBRS-based analyses as well (n=18,522). The impacts, however, of juvenile arrests are particularly difficult for varying areas, making this an important limitation of the DI score and a natural place for further assessment and inclusion in the future.

The federal poverty line does not capture regional variations in the cost of living. As a result, the relative economic deprivation for households is likely higher in high-cost areas, such as Greater Boston, than more low-cost areas.



Not all municipalities reported data to NIBRS during our study period. Boston is one such example, but data were obtained directly from BPD to address this limitation. The next largest example is Lawrence, a city of more than 80,000 people which only started reporting to NIBRS in 2020. Because of this gap in the data, Lawrence could not be included in the rankings of municipalities. Based on the demographics and economics of Lawrence, though, it is highly likely the city would rank high on the DI score if all data were available, indicating another natural place for further assessment and inclusion in the future.

Directions for Future Research

Juvenile populations

The impact of arrest and involvement with the criminal justice system during adolescence may result in different negative outcomes related to future employment, income, and family formation.¹³ The Commission should consider follow-up research to examine impacts of the “War on Drugs” on juveniles. Such an analysis would likely need to incorporate data that captures arrests as well as other markers of juveniles’ interactions with law enforcement and the criminal justice system.

Incarcerated populations

This study focused on drug-related arrests and was unable to consider impacts of other criminal justice system contact such as drug-related incarcerations and other forms of correctional control. Because incarceration has such negative impacts on individuals and areas, future research on this cohort should include measures of incarceration and related consequences (*i.e., parole, probation*) in addition to drug arrests.

Policy Considerations

This study highlights the top tiers of municipalities and census tracts on a measure of the impact of drug policy enforcement, with the top tiers of areas on the DI score indicating the most negatively impacted. The study can be used by the Commission to inform equitable policy and to help rectify and ameliorate the harms done by drug policy enforcement, particularly among low-income populations and communities of color.

This study involved careful construction of a quantitative measure for assessing disproportionate impact of drug enforcement across the Commonwealth. Throughout the report, special attention is paid to communities and census tracts that rank in the top two tiers on the DI score because they have been the most negatively impacted according to the measure. There is a full list of 295 municipalities and 305 census tracts ranked by DI score in the Appendix [See *Table VI-6*]; the precise cutoff point for an updated DIA list is a decision for the Commission.

Based on the relative nature of the calculated DI score (*i.e., areas with higher scores are “more impacted” than areas with lower scores*), it may be appropriate for the Commission to consider a graduated scheme that uses different strategies to attempt to address the impacts of drug policy



enforcement on areas in different tiers (or other groupings of areas). Such an approach would reflect the reality that in Tier 1 of the DI score, most residents may have experienced negative impacts from drug policy enforcement. In contrast, lower tiers are likely to be a subset of people who have such experiences. Eligibility for priority license status and other benefits could be based on a combination of requirements such as residence in a Tier 2 DIA and membership in an additional priority group (*e.g., personal or family history of drug arrest or incarceration; Black race and/or Latino ethnicity*).

It should be noted that disproportionate impact of drug policy enforcement occurs alongside and interacts with other economic and social problems (*e.g., slow job growth, low quality schools, etc.*). Thoughtful and strategic utilization of the DI score for policymaking can help improve social equity within the cannabis industry and in areas that have long faced social and economic challenges in the Commonwealth.

VI. References

1. Provine DM. Race and Inequality in the War on Drugs. *Annual Review of Law and Social Science*. 2011:41.
2. American Civil Liberties Union. *A Tale of Two Countries: Racially Targeted Arrests in the Era of Marijuana Reform*. 2020.
3. Pettit B, Gutierrez C. Mass Incarceration and Racial Inequality. *American Journal of Economics and Sociology*. 2018;77(3-4):1153-1182.
4. Gettman JB. *The Impact of Drug and Marijuana Arrests on Local Communities in Massachusetts*: Massachusetts Cannabis Control Commission; 2017.
5. Massachusetts Institute for a New Commonwealth. About the Gateway Cities. Available at: <https://massinc.org/our-work/policy-center/gateway-cities/about-the-gateway-cities/>. Accessed January 28, 2021.
6. Courtwright DT. The Controlled Substances Act: how a “big tent” reform became a punitive drug law. *Drug and Alcohol Dependence*. 2004;76(1):9-15.
7. United States Drug Enforcement Administration. Drug Scheduling. Available at: <https://www.dea.gov/drug-scheduling>. Accessed February 9, 2021.
8. Spillane J, McAllister WB. Keeping the lid on: a century of drug regulation and control. *Drug and Alcohol Dependence*. 2003;70(3) Supplement:S5-S12.
9. Spillane JF. Debating the Controlled Substances Act. *Drug and Alcohol Dependence*. 2004;76(1):17-29.
10. Gaston S. Enforcing Race: A Neighborhood-Level Explanation of Black–White Differences in Drug Arrests. *Crime & Delinquency*. 2019;65(4):499-526.
11. Petersilia J. *When prisoners come home: Parole and prisoner reentry*: Oxford University Press; 2003.
12. National Archive of Criminal Justice Data. National Incident-Based Reporting System, 2016: Extract Files: Inter-university Consortium for Political and Social Research [distributor]; 2018.
13. Barnert ES, Abrams LS, Dudovitz R, et al. What Is the Relationship Between Incarceration of Children and Adult Health Outcomes? *Academic Pediatrics*. 2019(3).
14. *U.S. Census Bureau Geocoder* [computer program]. Suitland, MD: U.S. Census Bureau; 2018.
15. *Geocodio* [computer program].Arlington, VA; Geocodio; 2020.
16. *Batchgeo* [computer program]. Vancouver, WA: Batchgeo; 2020.
17. *ArcGIS ArcMap* [computer program]. Version 10.7.1. Redlands, CA: ESRI; 2019.



VII. Appendices

Appendix I. Detailed Study Design and Methods

Additional methodological details to supplement information in previous sections are provided here. As described previously, data were analyzed for four time spans within the 18-year study period. For each time span, the source of population data is described in Table VI-1.

Table VII-1. Time spans and Corresponding Population Data Source(s)

Arrests between years	Population data source(s)
2000-2004	2000 Decennial Census
2005-2009	2000 Decennial Census
2010-2014	2010-2014 ACS 5-year set 2010 Decennial Census (for non-Latino racial shares only)
2015-2017	2013-2017 ACS 5-year set 2010 Decennial Census (for non-Latino racial shares only)

Geocoding

For the municipal-level analysis, the NIBRS data included information on where the arrest occurred used to assign each arrest to an area. To conduct geography-based analysis at the census tract level for the five largest cities in Massachusetts (Boston, Cambridge, Lowell, Springfield, and Worcester), each arrest from these areas were assigned to a specific census tract.

Data obtained from NIBRS and BPD include address-level information for the place an arrest occurred, which enabled the analyses to be geocoded (*i.e., assign a latitude and longitude to each arrest*) and aggregate arrests at the census tract level. To do this, unique identifiers were created for each arrest in the five largest cities associated with a drug offense incident. If the same individual was involved in and arrested for more than one incident, it was counted as multiple arrests.

The geocoding process was completed using three geocoding services: the address batch geocoder from the U.S. Census Bureau,¹⁴ and two private batch geocoding services – Geocodio¹⁵ and Batchgeo.¹⁶ Zip codes were lacking in most arrest records obtained for this study, but that information is required for the Census geocoder. Therefore, Geocodio and Batchgeo were used to geocode records without zip codes, intersections, and non-matches from the Census geocoder. Addresses not readable by geocoders, such as highways and place names, were geocoded by hand using ArcGIS software.¹⁷

There were 60,722 unique arrests in the NIBRS data for five largest cities (before exclusions) and 99.9 percent were successfully assigned a geocode. Fifty-six percent of those were geocoded by Geocodio or Batchgeo, with an average accuracy score of 98 percent. Ultimately, only 60 arrests were unable to be geocoded, all from the Springfield Police Department, due to



incomplete or missing street addresses. For BPD records, there were only 26 records out of 71,094 unable to be geocoded.

After geocoding, arrests were mapped to the appropriate census tract. Counts of arrests within each of the study time spans (2000-2004, 2005-2009, 2010-2014, 2015-2017) were then created at a tract and municipal level. Arrest data was then merged with population socioeconomic and demographic data for the key indicators in the same time spans and geographic areas.

Limitations

In addition to limitations mentioned above, there are a few additional considerations.

Poverty:

Some populations are excluded from data on poverty, including:

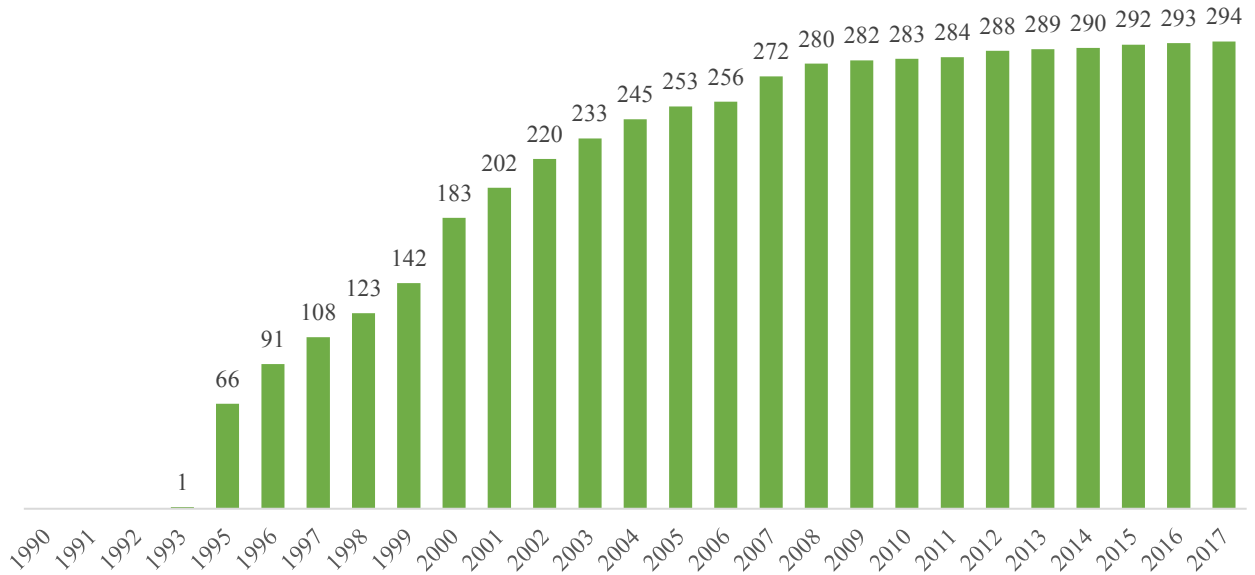
- Institutional group quarters (such as prisons or nursing homes);
- College dormitories (off-campus housing is still included, which can lead to high rates in college towns like Amherst or Williamstown);
- Military barracks; and
- Individuals without conventional housing (and who are not in shelters).

Latino ethnicity

This analysis included an indicator of the percent of adults that were Black and/or Latino in each geographic area. This crosstabulation of age by non-Latino race for the final two time spans do not exist in ACS 5-year data, so weights from the 2010 Decennial Census were applied to racial data from the ACS. For example, in Boston from 2015-2017, the white adult population from the ACS was 314,152. In 2010, the share of white adults who were non-Latino in Boston was 89 percent, resulting in an estimate of 280,781 white non-Latino adults from 2015-2017.

Appendix II. Data

Figure VII-1. Number of Municipalities Reporting to NIBRS, 1990-2017



Note: Boston did not begin reporting to NIBRS until 2019. Data obtained directly from the Boston Police Department was therefore used instead for the entire study period.

Table VII-2. Municipalities Excluded from Analysis

Municipality	County	2017 Population	Share Black/Latino	Reason for exclusion
Alford	Berkshire	411	4%	Did not report to NIBRS
Amherst	Hampshire	39,880	12%	High student enrollment
Aquinnah	Dukes	640	0%	Reports to NIBRS but had no drug arrests during the study period
Ashfield	Franklin	1,598	2%	Did not report to NIBRS
Avon	Norfolk	4,468	17%	Did not report to NIBRS
Becket	Berkshire	1,852	6%	Did not report to NIBRS
Blandford	Hampden	1,259	0%	Did not report to NIBRS
Brookfield	Worcester	3,406	1%	Did not report to NIBRS
Buckland	Franklin	1,927	0%	Did not report to NIBRS
Charlemont	Franklin	1,110	2%	Did not report to NIBRS
Chester	Hampden	1,529	3%	Did not report to NIBRS
Chilmark	Dukes	1,117	5%	Seasonal location
Clarksburg	Berkshire	1,722	1%	Did not report to NIBRS
Colrain	Franklin	1,631	1%	Did not report to NIBRS
Conway	Franklin	1,800	2%	Did not report to NIBRS
Cummington	Hampshire	860	7%	Did not report to NIBRS
Dighton	Bristol	7,438	4%	Did not report to NIBRS
Egremont	Berkshire	1,255	8%	Did not report to NIBRS
Essex	Essex	3,687	1%	Did not report to NIBRS
Florida	Berkshire	816	2%	Did not report to NIBRS
Gosnold	Dukes	34	0%	Did not report to NIBRS
Granville	Hampden	1,660	2%	Did not report to NIBRS
Hancock	Berkshire	639	2%	Did not report to NIBRS
Hawley	Franklin	425	6%	Did not report to NIBRS
Heath	Franklin	770	2%	Did not report to NIBRS
Hinsdale	Berkshire	1,970	0%	Did not report to NIBRS
Huntington	Hampshire	1,977	3%	Did not report to NIBRS
Lawrence	Essex	79,497	82%	Did not report to NIBRS
Leyden	Franklin	676	0%	Did not report to NIBRS
Manchester-by-the-Sea	Essex	5,327	2%	Seasonal location
Middlefield	Hampshire	464	0%	Did not report to NIBRS
Monroe	Franklin	86	0%	Did not report to NIBRS
Monterey	Berkshire	729	1%	Did not report to NIBRS
Montgomery	Hampden	802	2%	Did not report to NIBRS
Mount Washington	Berkshire	140	0%	Did not report to NIBRS
Nantucket	Nantucket	10,912	17%	Seasonal location
New Ashford	Berkshire	334	7%	Did not report to NIBRS
New Braintree	Worcester	1,247	2%	Did not report to NIBRS
New Marlborough	Berkshire	1,370	4%	Did not report to NIBRS
Otis	Berkshire	1,577	1%	Did not report to NIBRS
Peru	Berkshire	811	2%	Did not report to NIBRS
Petersham	Worcester	1,218	2%	Did not report to NIBRS
Phillipston	Worcester	1,640	2%	Did not report to NIBRS
Plainfield	Hampshire	668	4%	Did not report to NIBRS



Municipality	County	2017 Population	Share Black/Latino	Reason for exclusion
Provincetown	Barnstable	2,952	7%	Seasonal location
Richmond	Berkshire	1,521	1%	Did not report to NIBRS
Rockland	Plymouth	17,849	5%	Did not report to NIBRS
Rowe	Franklin	400	2%	Did not report to NIBRS
Russell	Hampden	1,330	3%	Did not report to NIBRS
Sandisfield	Berkshire	859	2%	Did not report to NIBRS
Savoy	Berkshire	764	7%	Did not report to NIBRS
Shutesbury	Franklin	1,752	6%	Did not report to NIBRS
Stockbridge	Berkshire	1,980	5%	Seasonal location
Sunderland	Franklin	3,662	10%	High student enrollment
Tolland	Hampden	666	1%	Did not report to NIBRS
Tyringham	Berkshire	439	4%	Did not report to NIBRS
Warwick	Franklin	750	2%	Did not report to NIBRS
Washington	Berkshire	499	1%	Did not report to NIBRS
Wellfleet	Barnstable	3,171	3%	Seasonal location
Wendell	Franklin	864	3%	Did not report to NIBRS
Wenham	Essex	5,179	7%	High student enrollment
West Stockbridge	Berkshire	1,095	8%	Did not report to NIBRS
West Tisbury	Dukes	2,417	2%	Seasonal location
Westhampton	Hampshire	1,819	1%	Did not report to NIBRS
Williamstown	Berkshire	7,623	12%	High student enrollment
Windsor	Berkshire	909	1%	Did not report to NIBRS
Worthington	Hampshire	1,253	1%	Did not report to NIBRS

Note: “High student enrollment” indicates undergraduate or graduate student enrollment rates of 20% of the area’s population or higher. “Seasonal location” indicates that more than 40% of arrests occurred in a single season and 25% or more of total housing units in an area are vacant for seasonal use (*i.e., vacation homes*).

For student enrollment percentage see Table VI-6.

Table VII-3. Census Tracts Excluded from Analysis

Tract	City	2017 Population	Share Black/Latino	Reason for exclusion
Census Tract 9801.01	Boston	322	32%	<1,000 residents. Natural areas/parks (Harbor Islands)
Census Tract 9803	Boston	365	53%	<1,000 residents. Natural areas/parks (Franklin Park)
Census Tract 9807	Boston	8	0%	<1,000 residents. Natural areas/parks (Stony Brook Reservation)
Census Tract 9810	Boston	0	0%	<1,000 residents. Natural areas/parks (Arnold Arboretum)
Census Tract 9811	Boston	409	72%	<1,000 residents. Natural areas/parks (Forest Hills Cemetery, Mount Hope Cemetery, Calvary Cemetery)
Census Tract 9812.01	Boston	0	0%	<1,000 residents. Natural areas/parks (Harbor Islands)
Census Tract 9812.02	Boston	224	16%	<1,000 residents. Natural areas/parks (Massport)
Census Tract 9813	Boston	426	35%	<1,000 residents. Major commercial/industrial areas (Boston Logan Airport)
Census Tract 9815.01	Boston	0	0%	<1,000 residents. Natural areas/parks (Charles River)
Census Tract 9815.02	Boston	12	100%	<1,000 residents. Major commercial/industrial area (Suffolk Downs & Irving Oil)
Census Tract 9816	Boston	0	0%	<1,000 residents. Natural areas/parks (Belle Island Reservation)
Census Tract 9817	Boston	0	0%	<1,000 residents. Natural areas/parks (Boston Common)
Census Tract 9818	Boston	22	0%	<1,000 residents. Natural areas/parks (Jamaica Pond & Emerald Necklace)
Census Tract 5.02	Boston	5,641	13%	High student enrollment
Census Tract 7.03	Boston	6,592	17%	High student enrollment
Census Tract 8.03	Boston	3,714	16%	High student enrollment
Census Tract 101.03	Boston	3,354	11%	High student enrollment
Census Tract 102.04	Boston	5,134	14%	High student enrollment
Census Tract 103	Boston	4,859	14%	High student enrollment
Census Tract 104.04	Boston	5,389	16%	High student enrollment
Census Tract 104.05	Boston	6,257	19%	High student enrollment
Census Tract 806.01	Boston	4,493	58%	High student enrollment
Census Tract 808.01	Boston	1,926	17%	High student enrollment
Census Tract 3531.02	Cambridge	5,881	12%	High student enrollment
Census Tract 3537	Cambridge	1,513	18%	High student enrollment
Census Tract 7312.02	Worcester	4,493	58%	High student enrollment
Census Tract 7316	Worcester	6,081	20%	High student enrollment

Note: “High student enrollment” indicates undergraduate or graduate student enrollment rates of 50% or higher within a census tract.



Table VII-4. Point Locations Excluded from Analysis

Municipality	County	2017 City Population	Share Black/Latino	Reason for exclusion
Andover	Essex	35,375	6%	Andover La Quinta 93N (suspected drug trafficking hub: in top 25 statewide and >10% of city total)
Andover	Essex	35,375	6%	Andover Mobil 93N (suspected drug trafficking hub: in top 25 statewide and >10% of city total)
Boston	Suffolk	669,158	42%	Police District building A-1, A-15 Downtown & Charlestown
Boston	Suffolk	669,158	42%	Police District building C-6 South Boston
Boston	Suffolk	669,158	42%	Police District building A-7 East Boston
Boston	Suffolk	669,158	42%	Police District building B-3 Mattapan/North Dorchester
Boston	Suffolk	669,158	42%	Police District building C-11 Dorchester
Boston	Suffolk	669,158	42%	Police District building D-4 South End
Boston	Suffolk	669,158	42%	Police District building B-2 Roxbury
Boston	Suffolk	669,158	42%	Boston Police Headquarters
Boston	Suffolk	669,158	42%	Police District building E-13 Jamaica Plain
Boston	Suffolk	669,158	42%	Police District building E-18 Hyde Park
Boston	Suffolk	669,158	42%	Police District building E-5 West Roxbury
Boston	Suffolk	669,158	42%	Police District building D-14 Brighton
Braintree	Norfolk	37,082	5%	South Shore Plaza Mall (suspected drug trafficking hub: in top 25 statewide and >10% of city total)
Cambridge	Middlesex	110,893	19%	Cambridge Police Headquarters
Lowell	Middlesex	110,964	27%	Lowell Police Headquarters
Lowell	Middlesex	110,964	27%	Lowell Regional Transit Authority (transit hub)
Mansfield	Bristol	23,678	5%	Xfinity Center (suspected drug trafficking hub: in top 25 statewide and >10% of city total)
Springfield	Hampden	154,613	63%	Springfield Police Headquarters
Springfield	Hampden	154,613	63%	Springfield Bus Terminal (transit hub)
Worcester	Worcester	184,743	33%	Worcester Police Headquarters
Worcester	Worcester	184,743	33%	Worcester City Motel (suspected drug trafficking hub: in top 25 statewide and >10% of city total)

Note: “Suspected drug trafficking hub” indicates point locations (based on geocoded latitudes and longitudes) that appeared in top 25 statewide arrest locations and comprised >15% of city’s total arrests.



Table VII-5. Characteristics of Adults Arrested for Drug-Related Offenses in Massachusetts, 2000-2017

	2000-2004		2005-2009		2010-2014		2015-2017		Total	
	n	%	n	%	n	%	n	%	n	%
Drug Offense Type Based on Highest Charge										
Class D, Possession	14,532	26.9	18,687	25.7	3,992	6.5	1,484	3.9	38,695	17.1
Class D, Distribution	3,358	6.2	5,201	7.1	5,080	8.2	1,704	4.5	15,343	6.8
Class D, Other	1,476	2.7	1,928	2.6	1,008	1.6	312	0.8	4,724	2.1
Not Class D, Possession	17,017	31.5	24,929	34.2	29,344	47.6	21,733	57.0	93,023	41.1
Not Class D, Distribution	12,831	23.8	16,777	23.0	16,911	27.4	9,512	25.0	56,031	24.7
Not Class D, Other	4,734	8.8	5,294	7.3	5,281	8.6	3,366	8.8	18,675	8.2
Race (Regardless of Ethnicity)										
White	34,408	63.8	48,104	66.1	45,399	73.7	28,889	75.8	156,800	69.2
Black	17,815	33.0	22,391	30.8	14,599	23.7	8,140	21.4	62,945	27.8
American Indian/Alaska Native	8	0.0	12	0.0	3	0.0	4	0.0	27	0.0
Asian	481	0.9	684	0.9	597	1.0	361	0.9	2,123	0.9
Native Hawaiian or Other Pacific Islander	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	1,236	2.3	1,625	2.2	1,018	1.7	717	1.9	4,596	2.0
Ethnicity (Regardless of Race)										
Hispanic/Latino	12,887	23.9	15,210	20.9	13,037	21.2	8,864	23.3	49,998	22.1
Non-Hispanic/Latino	34,642	64.2	50,589	69.5	44,499	72.2	26,694	70.0	156,424	69.1
Unknown	6,419	11.9	7,017	9.6	4,080	6.6	2,553	6.7	20,069	8.9
Age										
18-29	30,339	56.2	43,016	59.1	33,111	53.7	17,451	45.8	123,917	54.7
30-39	13,598	25.2	15,405	21.2	15,507	25.2	11,785	30.9	56,295	24.9
40-49	7,868	14.6	10,621	14.6	8,744	14.2	5,530	14.5	32,763	14.5
50-59	1,843	3.4	3,268	4.5	3,655	5.9	2,813	7.4	11,579	5.1
60+	300	0.6	506	0.7	599	1.0	532	1.4	1,937	0.9
Dataset										
Boston Police Department (BPD)	23,350	43.3	24,301	33.4	15,908	25.8	7,535	19.8	71,094	31.4
National Incident-Based Reporting System (NIBRS)	30,598	56.7	48,515	66.6	45,708	74.2	30,576	80.2	155,397	68.6
<p>Note: Class D offenses include marijuana and hashish. Possession denotes charges where the highest charge was possession. Distribution denotes charges where the highest charge was distribution. Ethnicity is reported in these sources as “Hispanic or non-Hispanic.” Race and ethnicity were reported in NIBRS as combined concepts (e.g., <i>Black Hispanic</i>) whereas they were provided as separate variables in the BPD data set. Categorizing race and ethnicity required aggregating separate categories across both data sets; it was not possible to determine how many individuals from the NIBRS data set had an unknown ethnicity. Therefore, the totals are slightly lower than the subtotals for the year bin. The table above corrects for this by defining the “Unknown” category as the difference between the sum of Hispanic and Non-Hispanic and the total for the year bin.</p>										



Table VII-6. Municipalities in Tiers 1 and 2 (Top 20%) of Disproportionate Impact Score, by County

Rank	Municipality	DI Score	Tier (Score Range)	On prior DIA list?
Barnstable County				
16	Barnstable	87.01	Tier 1 (78.7 - 99.5)	No
28	Falmouth	78.67	Tier 1 (78.7 - 99.5)	No
30	Dennis	78.24	Tier 2 (69.6 - 78.6)	No
<i>N/A</i>	<i>Provincetown</i>	<i>76.25</i>	<i>Not ranked</i>	<i>No</i>
36	Yarmouth	76.16	Tier 2 (69.6 - 78.6)	No
42	Mashpee	73.55	Tier 2 (69.6 - 78.6)	No
56	Truro	69.57	Tier 2 (69.6 - 78.6)	No
57	Bourne	69.04	Tier 3 (52.7 - 69.5)	No
Berkshire County				
11	Pittsfield	88.58	Tier 1 (78.7 - 99.5)	Yes
27	North Adams	79.71	Tier 1 (78.7 - 99.5)	Yes
Bristol County				
2	New Bedford	98.02	Tier 1 (78.7 - 99.5)	Yes
5	Fall River	94.78	Tier 1 (78.7 - 99.5)	Yes
14	Taunton	87.62	Tier 1 (78.7 - 99.5)	Yes
26	Attleboro	80.33	Tier 1 (78.7 - 99.5)	No
Dukes County				
49	Oak Bluffs	71.60	Tier 2 (69.6 - 78.6)	No
Essex County				
4	Lynn	95.53	Tier 1 (78.7 - 99.5)	Yes
6	Salem	93.23	Tier 1 (78.7 - 99.5)	No
10	Haverhill	88.80	Tier 1 (78.7 - 99.5)	Yes
31	Methuen	78.01	Tier 2 (69.6 - 78.6)	No
34	Peabody	77.07	Tier 2 (69.6 - 78.6)	No
44	Salisbury	73.06	Tier 2 (69.6 - 78.6)	No
46	Beverly	72.37	Tier 2 (69.6 - 78.6)	No
53	Andover	70.76	Tier 2 (69.6 - 78.6)	No
Franklin County				
13	Greenfield	88.42	Tier 1 (78.7 - 99.5)	Yes
51	Montague	71.43	Tier 2 (69.6 - 78.6)	No
Hampden County				
1	Holyoke	99.52	Tier 1 (78.7 - 99.5)	Yes
<i>N/A</i>	<i>Springfield</i>	<i>98.62</i>	<i>Not ranked</i>	<i>Yes</i>
12	West Springfield	88.56	Tier 1 (78.7 - 99.5)	Yes
20	Chicopee	84.22	Tier 1 (78.7 - 99.5)	No
37	Palmer	75.91	Tier 2 (69.6 - 78.6)	No
48	Westfield	71.63	Tier 2 (69.6 - 78.6)	No
55	Agawam	69.81	Tier 2 (69.6 - 78.6)	No
Hampshire County				
<i>N/A</i>	<i>Amherst</i>	<i>90.82</i>	<i>Not ranked</i>	<i>Yes</i>
19	Northampton	85.00	Tier 1 (78.7 - 99.5)	No
Middlesex County				
<i>N/A</i>	<i>Lowell</i>	<i>92.66</i>	<i>Not ranked</i>	<i>No</i>
17	Everett	86.66	Tier 1 (78.7 - 99.5)	No
25	Malden	80.42	Tier 1 (78.7 - 99.5)	No
38	Somerville	74.19	Tier 2 (69.6 - 78.6)	No
43	Medford	73.26	Tier 2 (69.6 - 78.6)	No
45	Woburn	72.61	Tier 2 (69.6 - 78.6)	No



Rank	Municipality	DI Score	Tier (Score Range)	On prior DIA list?
47	Marlborough	71.85	Tier 2 (69.6 - 78.6)	No
<i>N/A</i>	<i>Cambridge</i>	<i>70.99</i>	<i>Not ranked</i>	<i>No</i>
59	Waltham	68.81	Tier 3 (52.7 - 69.5)	No
Nantucket County				
<i>N/A</i>	<i>Nantucket</i>	<i>81.69</i>	<i>Not ranked</i>	<i>No</i>
Norfolk County				
21	Quincy	83.36	Tier 1 (78.7 - 99.5)	Yes
24	Randolph	81.03	Tier 1 (78.7 - 99.5)	Yes
29	Weymouth	78.64	Tier 2 (69.6 - 78.6)	No
33	Stoughton	77.14	Tier 2 (69.6 - 78.6)	No
40	Braintree	73.78	Tier 2 (69.6 - 78.6)	Yes
50	Norwood	71.44	Tier 2 (69.6 - 78.6)	No
Plymouth County				
3	Brockton	96.55	Tier 1 (78.7 - 99.5)	Yes
35	Wareham	77.04	Tier 2 (69.6 - 78.6)	Yes
39	Plymouth	74.10	Tier 2 (69.6 - 78.6)	No
41	Middleborough	73.61	Tier 2 (69.6 - 78.6)	No
Suffolk County				
<i>N/A</i>	<i>Boston</i>	<i>98.39</i>	<i>Not ranked</i>	<i>Yes</i>
7	Chelsea	92.76	Tier 1 (78.7 - 99.5)	Yes
15	Revere	87.30	Tier 1 (78.7 - 99.5)	Yes
Worcester County				
<i>N/A</i>	<i>Worcester</i>	<i>97.87</i>	<i>Not ranked</i>	<i>Yes</i>
8	Fitchburg	92.33	Tier 1 (78.7 - 99.5)	Yes
9	Southbridge	90.13	Tier 1 (78.7 - 99.5)	Yes
18	Webster	85.66	Tier 1 (78.7 - 99.5)	No
22	Gardner	83.14	Tier 1 (78.7 - 99.5)	No
23	Leominster	82.70	Tier 1 (78.7 - 99.5)	No
32	Spencer	77.53	Tier 2 (69.6 - 78.6)	Yes
52	Sturbridge	70.88	Tier 2 (69.6 - 78.6)	No
58	Clinton	68.83	Tier 3 (52.7 - 69.5)	No
<p>Note: Cities and towns with high student enrollment (>20%) or high rates of seasonal housing/arrests have been grayed out and italicized. The states five largest cities are also grey as they have been ranked separately by tract (see Table IV-2 for a ranking by tract).</p> <p>See Appendix II. Data. Table VI-7 for DI scores and components for all Massachusetts Municipalities, 2000-2017 and Appendix II. Data. Table VI-8 for DI scores and components for all Census Tracts of large Massachusetts cities, 2000-20017.</p>				



Table VII-7. Disproportionate Impact Scores and score components in Massachusetts by Municipality, 2000-2017

Rank	Municipality	County	DI score	Student enroll (%)	2000-2004								2005-2009							
					Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
1	Holyoke	Hampden	99.52	6.0	486	242	1,731	246	26.4	246	43.3	244	385	279	1,371	284	26.4	284	43.3	282
N/A	Springfield†	Hampden	98.62	9.0	584	244	540	241	23.1	244	46.7	245	587	281	543	274	23.1	282	46.7	283
N/A	Boston†	Suffolk	98.39	16.0	4,546	246	962	244	19.5	241	38.6	243	4,749	284	1,005	283	19.5	279	38.6	281
2	New Bedford	Bristol	98.02	5.0	493	243	700	243	20.2	242	13.8	235	611	282	867	281	20.2	280	13.8	268
N/A	Worcester†	Worcester	97.87	14.0	885	245	671	242	17.9	239	20.9	240	956	283	725	279	17.9	277	20.9	277
3	Brockton	Plymouth	96.55	7.0	327	241	481	239	14.5	233	26.2	242	341	278	501	273	14.5	269	26.2	279
4	Lynn	Essex	95.53	7.0	-	-	-	-	-	-	-	-	228	276	351	254	-	274	-	280
5	Fall River	Bristol	94.78	6.0	314	240	450	237	17.1	238	5.4	206	472	280	677	278	17.1	276	5.4	236
6	Salem	Essex	93.23	10.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Chelsea	Suffolk	92.76	4.0	67	219	261	200	23.3	245	53.2	246	75	252	293	240	23.3	283	53.2	284
N/A	Lowell†	Middlesex	92.66	12.0	-	-	-	-	-	-	-	-	175	274	227	218	-	275	-	273
8	Fitchburg	Worcester	92.33	9.0	128	234	440	236	15.0	235	17.5	238	104	265	359	256	15.0	271	17.5	274
N/A	Amherst‡	Hampshire	90.82	60.0	142	239	466	238	20.2	243	10.6	228	189	275	623	275	20.2	281	10.6	261
9	Southbridge	Worcester	90.13	5.0	39	202	302	216	15.4	236	20.3	239	38	228	294	241	15.4	272	20.3	276
10	Haverhill	Essex	88.80	6.0	66	218	151	168	9.1	212	10.2	225	141	271	322	245	9.1	243	10.2	258
11	Pittsfield	Berkshire	88.58	5.0	-	-	-	-	-	-	-	-	145	273	411	266	-	259	-	235
12	West Springfield	Hampden	88.56	8.0	77	225	362	229	11.9	228	7.3	215	83	258	389	263	11.9	261	7.3	248
13	Greenfield	Franklin	88.42	8.0	43	203	300	215	14.0	231	4.3	197	60	245	423	267	14.0	267	4.3	226
14	Taunton	Bristol	87.62	5.0	110	232	262	201	10.0	220	6.2	210	144	272	343	253	10.0	252	6.2	243
15	Revere	Suffolk	87.30	7.0	140	237	374	231	14.6	234	11.9	229	140	269	374	257	14.6	270	11.9	262
16	Barnstable	Barnstable	87.01	5.0	90	227	241	196	8.8	208	4.3	196	140	270	376	259	8.8	238	4.3	225
17	Everett	Middlesex	86.66	7.0	51	214	171	174	11.8	227	15.3	236	96	263	323	246	11.8	260	15.3	271
18	Webster	Worcester	85.66	5.0	38	200	298	214	11.0	223	4.6	202	31	220	243	225	11.0	255	4.6	231
19	Northampton	Hampshire	85.00	15.0	50	213	208	187	9.8	217	6.8	212	75	253	312	243	9.8	249	6.8	245
20	Chicopee	Hampden	84.22	7.0	131	235	310	221	12.3	229	10.3	226	99	264	235	223	12.3	263	10.3	259
21	Quincy	Norfolk	83.36	9.0	138	236	190	184	7.3	195	4.1	188	236	277	325	247	7.3	220	4.1	216
22	Gardner	Worcester	83.14	5.0	34	198	212	191	9.6	216	5.8	209	41	234	260	228	9.6	248	5.8	241
23	Leominster	Worcester	82.70	6.0	95	229	309	220	9.5	215	13.7	234	50	240	163	174	9.5	247	13.7	267
N/A	Nantucket*	Nantucket	81.69	6.0	30	193	390	232	7.5	199	10.4	227	21	197	276	236	7.5	225	10.4	260
24	Randolph	Norfolk	81.03	9.0	58	217	242	197	4.1	108	24.2	241	63	246	264	229	4.1	120	24.2	278



					2000-2004								2005-2009								
Rank	Municipality	County	DI score	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	
25	Malden	Middlesex	80.42	11.0	141	238	312	222	9.2	213	12.6	231	66	247	147	166	9.2	244	12.6	264	
26	Attleboro	Bristol	80.33	5.0	44	207	140	159	6.2	176	5.7	208	73	251	232	221	6.2	198	5.7	240	
27	North Adams	Berkshire	79.71	13.0	21	180	182	178	18.2	240	3.4	178	25	207	218	211	18.2	278	3.4	205	
28	Falmouth	Barnstable	78.67	3.0	55	216	211	190	6.9	188	3.0	170	85	261	328	249	6.9	211	3.0	195	
29	Weymouth	Norfolk	78.64	6.0	-	-	-	-	-	-	-	-	89	262	212	206	-	189	-	185	
30	Dennis	Barnstable	78.24	5.0	27	190	202	186	7.0	191	3.5	180	27	210	200	200	7.0	214	3.5	207	
31	Methuen	Essex	78.01	8.0	11	141	34	43	7.4	196	9.9	223	56	244	171	183	7.4	221	9.9	256	
32	Spencer	Worcester	77.53	4.0	91	228	1,027	245	8.6	206	1.8	113	72	250	821	280	8.6	235	1.8	133	
33	Stoughton	Norfolk	77.14	6.0	29	192	140	156	4.6	130	7.3	214	50	239	237	224	4.6	146	7.3	247	
34	Peabody	Essex	77.07	6.0	99	230	265	204	5.3	150	4.1	189	78	255	210	203	5.3	167	4.1	218	
35	Wareham	Plymouth	77.04	4.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N/A	Provincetown*	Barnstable	76.25	3.0	8	115	237	195	16.3	237	9.7	221	11	143	342	252	16.3	273	9.7	254	
36	Yarmouth	Barnstable	76.16	5.0	43	204	209	189	7.5	198	2.6	161	45	237	221	214	7.5	224	2.6	184	
37	Palmer	Hampden	75.91	7.0	18	172	195	185	7.9	203	1.8	115	20	191	214	208	7.9	230	1.8	135	
38	Somerville	Middlesex	74.19	15.0	-	-	-	-	-	-	-	-	76	254	115	138	-	264	-	270	
39	Plymouth	Plymouth	74.10	5.0	100	231	260	198	5.4	152	3.3	175	126	268	328	250	5.4	169	3.3	202	
40	Braintree	Norfolk	73.78	5.0	69	221	262	203	3.8	92	2.2	141	121	267	461	271	3.8	104	2.2	162	
41	Middleborough	Plymouth	73.61	5.0	44	209	305	219	5.5	157	2.0	129	56	243	387	262	5.5	175	2.0	150	
42	Mashpee	Barnstable	73.55	5.0	18	171	183	179	5.5	155	4.3	195	43	235	441	269	5.5	173	4.3	224	
43	Medford	Middlesex	73.26	13.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44	Salisbury	Essex	73.06	7.0	21	181	348	228	6.8	184	1.4	80	19	189	311	242	6.8	207	1.4	95	
45	Woburn	Middlesex	72.61	5.0	67	220	227	192	6.1	175	4.7	203	38	229	130	155	6.1	197	4.7	232	
46	Beverly	Essex	72.37	12.0	85	226	272	207	5.7	166	2.7	163	84	259	269	232	5.7	187	2.7	187	
47	Marlborough	Middlesex	71.85	6.0	117	233	419	235	6.8	186	7.4	216	38	227	135	157	6.8	209	7.4	249	
48	Westfield	Hampden	71.63	13.0	37	199	122	144	11.3	226	5.6	207	31	221	100	121	11.3	258	5.6	239	
49	Oak Bluffs	Dukes	71.60	1.0	-	-	-	-	-	-	-	-	8	117	269	233	-	233	-	238	
50	Norwood	Norfolk	71.44	7.0	23	186	102	132	4.4	119	3.8	187	39	232	171	184	4.4	135	3.8	214	
51	Montague	Franklin	71.43	4.0	15	155	232	193	13.1	230	2.9	168	13	156	196	198	13.1	266	2.9	193	
N/A	Cambridge† ‡	Middlesex	70.99	27.0	-	-	-	-	-	-	-	-	83	257	94	112	-	265	-	275	
52	Sturbridge	Worcester	70.88	3.0	15	156	260	199	6.1	172	1.5	93	27	211	455	270	6.1	194	1.5	109	



Rank	Municipality	County	DI score	Student enroll (%)	2000-2004								2005-2009							
					Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
53	Andover	Essex	70.76	8.0	77	224	347	226	3.9	98	2.5	153	85	260	381	261	3.9	110	2.5	176
54	Raynham	Bristol	70.15	5.0	-	-	-	-	-	-	-	-	23	200	259	227	-	126	-	132
55	Agawam	Hampden	69.81	6.0	32	195	148	165	5.6	164	2.6	160	40	233	182	192	5.6	183	2.6	183
56	Truro	Barnstable	69.57	1.0	9	128	522	240	11.2	225	3.0	171	3	63	174	185	11.2	257	3.0	196
57	Bourne	Barnstable	69.04	7.0	13	148	87	122	7.1	192	2.7	162	17	184	119	141	7.1	215	2.7	186
58	Clinton	Worcester	68.83	8.0	31	194	304	217	7.1	194	12.9	232	28	213	271	234	7.1	217	12.9	265
59	Waltham	Middlesex	68.81	18.0	44	206	87	120	7.0	190	12.3	230	34	224	67	81	7.0	213	12.3	263
60	West Bridgewater	Plymouth	68.72	6.0	-	-	-	-	-	-	-	-	34	225	669	276	-	92	-	146
61	Dudley	Worcester	68.64	15.0	-	-	-	-	-	-	-	-	35	226	461	272	-	181	-	166
62	Maynard	Middlesex	68.49	6.0	13	150	165	173	5.6	162	3.5	182	14	168	178	187	5.6	180	3.5	209
63	Milford	Worcester	68.06	5.0	-	-	-	-	-	-	-	-	22	198	108	133	-	218	-	237
64	Ware	Hampshire	67.84	6.0	8	121	109	138	11.2	224	2.3	143	9	127	123	145	11.2	256	2.3	164
65	Framingham	Middlesex	67.51	8.0	-	-	-	-	-	-	-	-	0	8	0	8	-	231	-	269
66	Monson	Hampden	67.29	5.0	17	168	278	209	5.6	161	1.6	98	23	205	374	258	5.6	179	1.6	114
67^	Auburn	Worcester	67.28	7.0	51	215	418	234	3.3	65	1.5	92	44	236	355	255	3.3	74	1.5	108
67^	Leicester	Worcester	67.28	10.0	15	152	188	182	4.3	116	2.9	166	52	241	676	277	4.3	132	2.9	191
68	Abington	Plymouth	65.98	6.0	45	210	412	233	3.6	81	1.4	74	108	266	994	282	3.6	91	1.4	88
69	Hadley	Hampshire	65.82	7.0	5	90	124	146	6.9	187	2.4	146	17	182	433	268	6.9	210	2.4	168
70	Athol	Worcester	65.80	4.0	6	106	71	98	9.4	214	2.4	151	13	155	152	170	9.4	246	2.4	173
71	Great Barrington	Berkshire	65.71	11.0	-	-	-	-	-	-	-	-	10	134	164	176	-	219	-	217
72	Wilbraham	Hampden	65.55	5.0	29	191	296	212	5.1	146	2.4	147	15	177	156	171	5.1	163	2.4	169
73	Ludlow	Hampden	65.53	5.0	11	135	66	91	6.4	180	8.5	218	16	180	97	115	6.4	202	8.5	251
74	Fairhaven	Bristol	65.24	6.0	19	176	149	166	9.0	210	1.4	72	29	216	229	219	9.0	241	1.4	85
75	Easthampton	Hampshire	64.69	10.0	19	175	149	167	8.9	209	2.5	154	26	209	209	202	8.9	239	2.5	177
76	Winchendon	Worcester	64.58	6.0	10	132	155	171	10.0	219	2.6	159	13	158	197	199	10.0	251	2.6	182
77	Tewksbury	Middlesex	62.98	6.0	33	197	154	169	3.8	91	1.8	118	28	212	129	154	3.8	103	1.8	138
78	Watertown	Middlesex	62.70	8.0	21	183	75	105	6.3	178	4.2	193	25	208	88	104	6.3	200	4.2	222
79	Holbrook	Norfolk	62.58	9.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
80	Amesbury	Essex	62.05	4.0	38	201	316	224	5.9	171	1.4	78	22	199	179	189	5.9	193	1.4	93
81	Hull	Plymouth	61.38	4.0	11	143	132	152	8.3	204	1.4	71	19	188	216	210	8.3	232	1.4	84



					2000-2004								2005-2009							
Rank	Municipality	County	DI score	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
82	Danvers	Essex	60.49	6.0	46	212	236	194	2.9	51	1.1	34	80	256	411	265	2.9	58	1.1	40
83	Lunenburg	Worcester	59.99	6.0	2	51	32	38	4.1	110	1.7	110	15	175	218	212	4.1	122	1.7	127
84	Walpole	Norfolk	59.26	5.0	22	184	129	149	2.2	19	3.5	181	54	242	319	244	2.2	21	3.5	208
85	Concord	Middlesex	58.82	3.0	44	208	346	225	3.9	100	4.9	204	23	204	184	193	3.9	112	4.9	233
86	Northbridge	Worcester	58.75	4.0	15	154	155	170	5.3	148	2.1	135	12	150	126	151	5.3	165	2.1	156
87	Whitman	Plymouth	58.66	5.0	-	-	-	-	-	-	-	-	17	183	167	181	-	78	-	91
88	Newburyport	Essex	58.51	4.0	11	136	81	112	5.2	147	1.2	58	29	218	216	209	5.2	164	1.2	67
89	North Attleborough	Bristol	58.23	6.0	69	222	348	227	3.8	96	2.1	136	66	248	334	251	3.8	108	2.1	157
90	Orleans	Barnstable	57.34	1.0	6	105	107	134	6.5	182	1.3	62	21	196	380	260	6.5	204	1.3	75
91	Brookline	Norfolk	57.15	13.0	-	-	-	-	-	-	-	-	32	222	67	82	-	245	-	242
92	Lenox	Berkshire	56.87	6.0	-	-	-	-	-	-	-	-	7	111	167	179	-	240	-	200
93	Somerset	Bristol	56.38	5.0	26	188	176	176	4.0	104	0.6	3	39	230	266	231	4.0	116	0.6	4
94	Saugus	Essex	55.77	5.0	26	189	126	147	4.2	114	1.3	66	29	217	141	160	4.2	129	1.3	79
95	Oxford	Worcester	55.68	9.0	12	145	124	145	7.8	200	2.6	158	10	136	97	117	7.8	227	2.6	181
96	Seekonk	Bristol	55.51	5.0	21	182	209	188	2.4	25	1.2	49	23	202	227	217	2.4	30	1.2	57
97	Hopedale	Worcester	55.13	3.0	3	68	73	102	4.0	106	1.7	106	9	130	211	205	4.0	118	1.7	123
98	West Boylston	Worcester	54.95	4.0	8	117	129	150	3.2	63	9.1	219	23	203	398	264	3.2	72	9.1	252
99	Winthrop	Suffolk	54.49	7.0	12	144	79	109	5.5	159	4.2	192	13	159	90	108	5.5	177	4.2	221
100	Mansfield	Bristol	54.32	7.0	17	163	108	135	4.5	126	3.5	183	14	164	92	110	4.5	142	3.5	210
101	Shrewsbury	Worcester	54.21	6.0	43	205	183	180	4.8	137	2.9	167	30	219	128	152	4.8	153	2.9	192
102	Boxborough	Middlesex	53.86	8.0	9	130	276	208	2.8	45	1.4	85	10	139	290	239	2.8	52	1.4	100
103	Gloucester	Essex	53.82	4.0	10	131	44	62	8.8	207	1.9	122	10	137	41	47	8.8	237	1.9	142
104	Chelmsford	Middlesex	53.77	6.0	76	223	298	213	2.8	44	1.9	126	49	238	192	197	2.8	51	1.9	147
105	Orange	Franklin	53.76	5.0	2	56	44	61	7.8	201	2.6	157	9	129	163	175	7.8	228	2.6	180
106	Tisbury	Dukes	53.67	1.0	-	-	-	-	-	-	-	-	2	57	84	99	-	262	-	215
107	South Hadley	Hampshire	53.37	19.0	6	104	42	57	5.9	169	3.3	176	12	151	87	103	5.9	191	3.3	203
N/A	Williamstown ‡	Berkshire	53.32	35.0	3	62	40	53	5.5	158	5.2	205	7	108	93	111	5.5	176	5.2	234
108	Warren	Worcester	53.13	4.0	4	82	114	142	6.1	173	1.2	42	4	72	103	126	6.1	195	1.2	49
109	Ayer	Middlesex	52.95	10.0	3	69	58	80	10.8	222	10.1	224	6	96	101	123	10.8	254	10.1	257
110	Harwich	Barnstable	52.72	4.0	3	57	25	30	5.5	160	1.6	96	23	201	223	216	5.5	178	1.6	112



Rank	Municipality	County	DI score	Student enroll (%)	2000-2004								2005-2009							
					Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
111	Williamsburg	Hampshire	52.68	3.0	3	60	140	157	5.5	156	0.8	7	2	50	105	129	5.5	174	0.8	9
112	Edgartown	Dukes	52.50	3.0	-	-	-	-	-	-	-	-	2	52	68	83	-	130	-	188
113	Hudson	Middlesex	51.95	6.0	20	179	145	163	4.5	127	3.7	185	20	190	144	164	4.5	143	3.7	212
114	Sutton	Worcester	51.77	4.0	11	139	189	183	4.4	121	0.9	16	16	181	282	237	4.4	137	0.9	20
115	Pelham	Hampshire	51.43	4.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
116	Ashland	Middlesex	51.35	5.0	15	158	140	160	2.0	15	4.5	199	18	186	168	182	2.0	17	4.5	228
117	Bellingham	Norfolk	51.31	6.0	15	157	136	154	2.5	29	2.0	132	12	152	107	132	2.5	35	2.0	153
118	Douglas	Worcester	51.04	4.0	3	64	60	83	4.6	133	1.2	53	14	163	282	238	4.6	149	1.2	62
119	Chatham	Barnstable	50.99	4.0	18	169	305	218	4.8	139	2.8	164	6	100	104	128	4.8	156	2.8	189
120	Canton	Norfolk	50.91	5.0	11	142	72	99	3.4	71	4.1	191	14	160	86	102	3.4	81	4.1	220
121	Dartmouth	Bristol	50.78	18.0	16	160	66	92	4.5	129	2.4	148	15	176	63	74	4.5	145	2.4	170
122	Bridgewater	Plymouth	50.62	20.0	8	118	40	54	3.5	78	6.5	211	14	170	74	88	3.5	88	6.5	244
123	Natick	Middlesex	50.58	6.0	25	187	101	131	2.8	40	3.4	179	39	231	157	172	2.8	47	3.4	206
124	East Bridgewater	Plymouth	50.26	6.0	5	95	56	77	4.1	111	1.6	102	21	194	220	213	4.1	124	1.6	119
125	Sandwich	Barnstable	50.11	7.0	16	159	108	136	3.1	56	1.1	35	18	185	123	147	3.1	64	1.1	41
N/A	Sunderland‡	Franklin	50.08	24.0	1	26	32	39	14.0	232	4.5	200	7	112	233	222	14.0	268	4.5	229
126	Franklin	Norfolk	49.09	8.0	22	185	106	133	2.8	46	2.0	130	67	249	326	248	2.8	53	2.0	151
127	Wakefield	Middlesex	48.76	5.0	12	146	64	89	3.1	59	1.2	40	29	214	149	168	3.1	67	1.2	47
128	Swansea	Bristol	48.38	4.0	17	167	136	155	4.9	141	0.9	14	29	215	231	220	4.9	158	0.9	18
129	Erving	Franklin	48.23	4.0	1	24	71	97	6.7	183	0.8	9	1	31	88	105	6.7	206	0.8	13
130	Billerica	Middlesex	48.03	6.0	11	137	38	51	3.8	89	2.4	152	24	206	82	95	3.8	101	2.4	174
131	North Andover	Essex	48.02	9.0	17	166	82	115	2.9	48	2.6	156	15	173	73	87	2.9	55	2.6	179
132	Northborough	Worcester	47.82	6.0	18	173	184	181	2.8	41	1.9	121	9	132	95	113	2.8	48	1.9	141
133	Georgetown	Essex	47.10	4.0	-	-	-	-	-	-	-	-	9	131	175	186	-	128	-	6
134	Uxbridge	Worcester	47.09	6.0	9	126	111	140	4.7	135	1.0	26	5	90	66	77	4.7	151	1.0	31
135	Wellesley	Norfolk	46.86	18.0	19	177	96	126	3.8	95	3.7	186	12	149	59	69	3.8	107	3.7	213
136	Adams	Berkshire	46.81	3.0	5	87	67	94	10.3	221	1.1	30	7	107	97	116	10.3	253	1.1	36
137	Burlington	Middlesex	46.78	6.0	11	138	63	87	1.9	13	2.5	155	20	192	114	137	1.9	13	2.5	178
138	Plainville	Norfolk	46.61	5.0	1	27	17	25	4.0	107	1.6	101	15	174	266	230	4.0	119	1.6	117
139	Deerfield	Franklin	46.16	6.0	1	35	33	40	4.5	128	2.0	131	4	73	98	118	4.5	144	2.0	152



					2000-2004								2005-2009							
Rank	Municipality	County	DI score	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
140	Lee	Berkshire	46.00	6.0	-	-	-	-	-	-	-	-	6	97	124	148	-	205	-	197
141	Mendon	Worcester	45.93	4.0	3	65	82	114	4.0	105	1.2	41	5	94	145	165	4.0	117	1.2	48
142	Newton	Middlesex	45.87	12.0	33	196	50	71	4.3	117	4.3	194	20	193	31	37	4.3	133	4.3	223
143	Wilmington	Middlesex	45.54	6.0	-	-	-	-	-	-	-	-	33	223	210	204	-	15	-	72
144	Brewster	Barnstable	45.39	3.0	4	80	50	72	3.7	88	1.8	114	13	154	158	173	3.7	100	1.8	134
145	Westport	Bristol	45.37	6.0	16	161	147	164	4.9	140	0.8	8	14	161	124	149	4.9	157	0.8	11
146	Lakeville	Plymouth	45.21	6.0	-	-	-	-	-	-	-	-	9	125	121	142	-	60	-	59
147	Hardwick	Worcester	45.20	4.0	1	30	64	90	7.5	197	1.4	76	0	14	11	20	7.5	223	1.4	90
148	Carver	Plymouth	45.10	5.0	6	107	76	107	5.0	143	2.0	128	5	88	62	70	5.0	160	2.0	149
149	North Reading	Middlesex	44.93	5.0	18	170	176	175	1.5	5	1.1	28	14	167	142	162	1.5	5	1.1	33
N/A	Chilmark*	Dukes	44.86	5.0	-	-	-	-	-	-	-	-	1	33	150	169	-	226	-	34
150	Eastham	Barnstable	44.79	2.0	4	86	98	129	7.0	189	2.3	144	1	38	31	38	7.0	212	2.3	165
151	Marshfield	Plymouth	44.39	6.0	8	123	48	67	5.4	153	1.2	38	15	172	83	96	5.4	171	1.2	45
152	Northfield	Franklin	44.25	6.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
153	Kingston	Plymouth	44.10	6.0	2	49	26	32	5.8	167	1.6	104	14	166	166	177	5.8	188	1.6	121
154	Grafton	Worcester	44.07	6.0	4	84	38	50	5.6	165	3.0	169	10	141	90	109	5.6	184	3.0	194
155	Rowley	Essex	43.62	4.0	3	67	81	113	4.1	112	1.0	25	7	113	182	191	4.1	125	1.0	29
156	Southwick	Hampden	43.57	5.0	5	98	83	116	6.1	174	2.1	133	7	106	102	125	6.1	196	2.1	154
157	Westborough	Worcester	43.45	4.0	5	91	37	48	4.7	134	4.5	201	10	135	75	90	4.7	150	4.5	230
158	Hingham	Plymouth	43.25	4.0	45	211	313	223	3.5	75	1.1	32	14	165	99	119	3.5	85	1.1	38
N/A	Wellfleet*	Barnstable	43.14	4.0	-	-	-	-	-	-	-	-	2	40	66	78	-	222	-	118
159	Arlington	Middlesex	42.86	5.0	17	165	48	69	4.1	109	3.4	177	14	169	42	50	4.1	121	3.4	204
160	Blackstone	Worcester	42.34	5.0	3	63	47	66	3.7	87	1.3	67	9	128	141	161	3.7	99	1.3	80
161	Harvard	Worcester	42.10	4.0	6	110	142	161	2.0	16	9.8	222	2	46	41	48	2.0	18	9.8	255
162	Marblehead	Essex	42.00	4.0	20	178	128	148	4.3	115	1.2	55	18	187	119	140	4.3	131	1.2	64
163	Barre	Worcester	41.73	6.0	1	33	33	41	3.4	74	1.2	47	5	93	148	167	3.4	84	1.2	55
164	Holland	Hampden	41.56	4.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
165	Foxborough	Norfolk	41.54	4.0	-	-	-	-	-	-	-	-	1	25	5	12	-	71	-	129
166	Lincoln	Middlesex	41.42	7.0	5	88	84	118	0.8	1	7.5	217	11	142	190	195	0.8	1	7.5	250
167	Tyngsborough	Middlesex	41.04	6.0	6	109	80	111	4.7	136	1.5	95	3	69	44	54	4.7	152	1.5	111
168	Marion	Plymouth	40.86	3.0	3	61	73	100	4.6	132	2.1	134	5	95	141	159	4.6	148	2.1	155



					2000-2004								2005-2009							
Rank	Municipality	County	DI score	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
169	Sherborn	Middlesex	40.85	2.0	8	114	262	202	2.3	23	1.5	90	5	92	189	194	2.3	26	1.5	106
170	Belchertown	Hampshire	40.83	8.0	8	119	84	117	5.9	170	2.1	138	8	120	85	100	5.9	192	2.1	159
171	Pembroke	Plymouth	40.68	6.0	5	99	45	63	4.8	138	1.0	20	11	144	89	106	4.8	155	1.0	24
172	Easton	Bristol	40.22	12.0	7	111	40	55	2.0	14	3.1	172	12	148	69	84	2.0	16	3.1	198
173	Granby	Hampshire	39.99	5.0	3	58	57	79	2.2	20	1.4	82	8	116	166	178	2.2	22	1.4	97
174	Charlton	Worcester	39.83	7.0	9	129	114	141	5.6	163	1.1	33	8	122	104	127	5.6	182	1.1	39
175	Acushnet	Bristol	39.68	8.0	7	112	87	121	3.8	93	1.0	24	13	157	167	180	3.8	105	1.0	28
176	Acton	Middlesex	39.24	5.0	19	174	130	151	2.9	49	2.3	145	14	171	100	122	2.9	56	2.3	167
177	Swampscott	Essex	39.04	6.0	4	85	38	52	3.7	82	1.9	124	8	123	75	91	3.7	93	1.9	144
178	Melrose	Middlesex	38.98	8.0	14	151	68	95	3.3	69	1.9	123	16	178	76	92	3.3	79	1.9	143
N/A	Stockbridge*	Berkshire	38.94	3.0	0	3	0	4	8.5	205	4.1	190	0	13	10	19	8.5	234	4.1	219
179	Holliston	Middlesex	38.80	5.0	13	149	135	153	3.4	72	2.1	137	10	140	101	124	3.4	82	2.1	158
180	Hubbardston	Worcester	38.62	7.0	8	116	282	210	3.7	83	1.2	51	5	86	178	188	3.7	94	1.2	60
181	East Longmeadow	Hampden	38.61	7.0	2	55	23	29	3.4	73	1.6	100	5	87	47	56	3.4	83	1.6	116
182	Dedham	Norfolk	38.47	7.0	8	125	46	65	4.6	131	3.7	184	10	138	53	63	4.6	147	3.7	211
183	Dracut	Middlesex	38.45	7.0	11	133	50	73	3.7	85	2.2	142	11	145	52	62	3.7	96	2.2	163
184	Millbury	Worcester	38.45	7.0	7	113	73	101	6.3	177	1.5	87	6	103	63	73	6.3	199	1.5	102
185	Shirley	Middlesex	38.35	3.0	2	43	36	47	3.3	64	13.4	233	2	44	32	42	3.3	73	13.4	266
186	East Brookfield	Worcester	37.96	6.0	4	83	269	205	3.9	101	1.2	50	2	51	128	153	3.9	113	1.2	58
187	Freetown	Bristol	37.93	5.0	4	74	56	78	5.0	142	1.4	81	5	89	81	94	5.0	159	1.4	96
188	Millville	Worcester	37.71	4.0	2	47	98	128	5.8	168	1.3	68	2	49	96	114	5.8	190	1.3	81
189	Ashburnham	Worcester	37.53	9.0	2	44	46	64	6.4	181	1.7	112	5	85	122	143	6.4	203	1.7	130
190	Littleton	Middlesex	37.41	6.0	11	134	181	177	3.6	80	1.2	39	12	153	201	201	3.6	90	1.2	46
191	Pepperell	Middlesex	37.36	6.0	11	140	145	162	3.7	84	1.4	75	9	124	111	136	3.7	95	1.4	89
192	Boylston	Worcester	36.65	5.0	8	122	270	206	2.8	39	1.2	46	7	115	244	226	2.8	46	1.2	54
193	Dalton	Berkshire	36.44	6.0	3	72	66	93	2.7	38	1.4	84	6	101	117	139	2.7	45	1.4	99
194	West Brookfield	Worcester	36.35	7.0	2	42	55	75	6.8	185	1.2	48	4	74	123	144	6.8	208	1.2	56
195	Lancaster	Worcester	36.21	6.0	1	17	10	14	4.1	113	16.4	237	0	19	7	13	4.1	127	16.4	272
196	Belmont	Middlesex	36.11	6.0	5	94	27	33	4.4	124	2.8	165	4	79	22	28	4.4	140	2.8	190
197	Hanson	Plymouth	35.91	7.0	5	100	79	110	3.8	94	1.7	107	6	99	85	101	3.8	106	1.7	124



Rank	Municipality	County	DI score	Student enroll (%)	2000-2004								2005-2009							
					Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
198	Hamilton	Essex	35.42	9.0	3	71	55	76	5.3	151	1.4	79	7	109	109	134	5.3	168	1.4	94
199	Hopkinton	Middlesex	35.25	5.0	4	77	43	60	1.7	7	1.9	125	16	179	181	190	1.7	7	1.9	145
200	Upton	Worcester	34.67	5.0	6	102	140	158	3.5	77	1.0	23	4	71	90	107	3.5	87	1.0	27
201	Groveland	Essex	34.65	6.0	4	75	85	119	4.5	125	0.8	6	12	147	273	235	4.5	141	0.8	8
202	Wrentham	Norfolk	34.54	7.0	3	66	42	58	3.9	99	1.3	65	3	67	42	51	3.9	111	1.3	78
203	Westwood	Norfolk	33.41	4.0	9	127	88	123	2.5	31	1.3	60	7	110	65	75	2.5	37	1.3	70
204	Berlin	Worcester	32.92	6.0	5	96	291	211	3.9	97	0.6	2	4	76	213	207	3.9	109	0.6	3
205	Lexington	Middlesex	32.91	6.0	17	164	74	103	3.4	70	2.4	150	11	146	51	60	3.4	80	2.4	172
206	Norton	Bristol	32.77	15.0	15	153	111	139	4.0	103	2.2	140	5	84	36	43	4.0	115	2.2	161
207	North Brookfield	Worcester	32.61	8.0	4	79	117	143	5.5	154	1.3	63	3	60	76	93	5.5	172	1.3	76
208	Holden	Worcester	32.60	6.0	4	81	35	45	3.1	61	1.3	61	7	114	65	76	3.1	69	1.3	74
209	Stoneham	Middlesex	32.36	6.0	-	-	-	-	-	-	-	-	1	37	8	15	-	123	-	175
210	Milton	Norfolk	32.26	11.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
211	Longmeadow	Hampden	32.24	7.0	8	120	70	96	2.1	17	1.7	109	8	121	70	85	2.1	19	1.7	126
212	Norfolk	Norfolk	31.92	4.0	1	36	16	21	1.1	2	9.4	220	3	65	42	52	1.1	2	9.4	253
213	Bolton	Worcester	31.86	5.0	2	46	62	86	1.8	10	0.9	13	4	78	139	158	1.8	10	0.9	17
214	Sharon	Norfolk	31.76	5.0	6	103	48	68	3.0	55	4.4	198	3	70	28	33	3.0	63	4.4	227
215	Bedford	Middlesex	31.50	5.0	1	34	12	18	2.5	26	3.2	174	6	105	67	79	2.5	32	3.2	201
216	Templeton	Worcester	31.40	5.0	1	23	16	22	9.1	211	1.7	108	2	42	32	41	9.1	242	1.7	125
217	Needham	Norfolk	31.06	5.0	13	147	59	81	2.5	30	1.8	116	8	119	37	46	2.5	36	1.8	136
218	Rehoboth	Bristol	30.98	8.0	5	89	63	88	3.1	57	0.8	11	9	133	125	150	3.1	65	0.8	15
219	Dunstable	Middlesex	30.76	7.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
220	Newbury	Essex	30.76	9.0	2	54	49	70	3.1	62	1.2	52	2	45	37	44	3.1	70	1.2	61
221	Mattapoisett	Plymouth	30.52	7.0	5	92	101	130	3.6	79	1.2	43	3	66	67	80	3.6	89	1.2	50
222	Townsend	Middlesex	30.43	5.0	2	53	38	49	5.1	144	1.7	111	4	77	63	72	5.1	161	1.7	128
223	Halifax	Plymouth	30.20	5.0	2	41	29	36	3.3	68	0.8	10	6	104	111	135	3.3	77	0.8	14
224	Ipswich	Essex	30.01	6.0	1	37	12	19	7.1	193	1.3	64	1	28	8	16	7.1	216	1.3	77
225	Groton	Middlesex	29.72	5.0	6	108	96	127	4.0	102	1.5	86	0	15	3	11	4.0	114	1.5	101
226	Stow	Middlesex	29.71	5.0	1	32	28	34	2.7	36	1.5	94	6	102	142	163	2.7	43	1.5	110
227	Nahant	Essex	29.61	4.0	2	45	61	84	2.6	33	1.2	59	2	55	74	89	2.6	40	1.2	69



					2000-2004								2005-2009							
Rank	Municipality	County	DI score	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
228	West Newbury	Essex	29.55	5.0	2	50	76	106	3.8	90	0.8	5	2	43	55	66	3.8	102	0.8	7
229	Sterling	Worcester	29.22	5.0	5	93	93	124	2.9	50	1.2	54	4	81	84	98	2.9	57	1.2	63
230	Sudbury	Middlesex	29.09	4.0	4	78	35	46	2.8	43	2.0	127	14	162	123	146	2.8	50	2.0	148
231	Princeton	Worcester	28.88	6.0	1	21	25	31	4.4	123	1.5	91	1	21	25	30	4.4	139	1.5	107
232	Scituate	Plymouth	28.38	4.0	3	59	20	28	2.6	32	1.2	57	8	118	59	68	2.6	39	1.2	66
233	Whately	Franklin	28.36	8.0	1	38	108	137	3.0	53	1.5	88	2	41	130	156	3.0	61	1.5	103
234	Weston	Middlesex	28.27	9.0	0	8	2	8	2.9	47	3.1	173	3	61	31	39	2.9	54	3.1	199
235	Topsfield	Essex	28.13	5.0	16	162	372	230	1.7	9	1.2	44	3	64	73	86	1.7	9	1.2	51
236	Berkley	Bristol	27.92	5.0	-	-	-	-	-	-	-	-	3	68	83	97	-	38	-	104
237	Merrimac	Essex	27.84	6.0	2	52	54	74	2.7	37	1.1	36	5	83	106	130	2.7	44	1.1	43
238	Plympton	Plymouth	27.60	7.0	0	5	0	3	2.1	18	1.4	73	4	75	191	196	2.1	20	1.4	86
239	Wayland	Middlesex	27.57	4.0	3	70	34	42	2.5	27	1.8	117	6	98	62	71	2.5	33	1.8	137
240	Middleton	Essex	27.50	5.0	1	29	17	24	3.7	86	7.3	213	1	23	10	18	3.7	97	7.3	246
N/A	Manchester-by-the-Sea*	Essex	27.45	5.0	-	-	-	-	-	-	-	-	1	29	20	26	-	154	-	12
241	Rutland	Worcester	26.43	5.0	0	2	0	6	3.3	67	2.2	139	1	39	32	40	3.3	76	2.2	160
242	Shelburne	Franklin	26.33	6.0	0	16	29	37	9.9	218	1.1	29	0	6	0	10	9.9	250	1.1	35
243	Cohasset	Norfolk	26.26	4.0	8	124	160	172	2.8	42	0.9	12	5	91	99	120	2.8	49	0.9	16
244	Reading	Middlesex	26.09	6.0	3	73	19	26	2.6	35	1.2	37	9	126	51	61	2.6	42	1.2	44
245	Gill	Franklin	25.86	5.0	1	25	77	108	4.4	122	1.0	18	1	24	58	67	4.4	138	1.0	22
246	Westford	Middlesex	25.49	6.0	1	19	4	9	1.7	8	1.3	70	3	62	20	25	1.7	8	1.3	83
247	Hanover	Plymouth	25.16	5.0	-	-	-	-	-	-	-	-	21	195	223	215	-	27	-	42
248	Leverett	Franklin	25.06	5.0	-	-	-	-	-	-	-	-	0	9	0	2	-	170	-	131
249	Oakham	Worcester	24.70	8.0	-	-	-	-	-	-	-	-	0	16	17	23	-	14	-	87
250	Winchester	Middlesex	23.89	4.0	5	101	35	44	2.6	34	1.6	99	4	82	28	34	2.6	41	1.6	115
251	Bernardston	Franklin	23.87	4.0	1	28	60	82	4.4	118	0.5	1	0	1	0	5	4.4	134	0.5	2
252	Southampton	Hampshire	23.67	3.0	-	-	-	-	-	-	-	-	4	80	106	131	-	29	-	30
253	Rockport	Essex	22.56	2.0	-	-	-	-	-	-	-	-	3	58	41	49	-	98	-	73
N/A	West Tisbury*	Dukes	22.48	4.0	-	-	-	-	-	-	-	-	1	27	42	53	-	31	-	68
254	Royalston	Worcester	22.46	3.0	-	-	-	-	-	-	-	-	0	17	45	55	-	236	-	10
255	Westminster	Worcester	22.19	7.0	1	18	12	17	3.1	60	1.4	83	2	56	47	58	3.1	68	1.4	98



Rank	Municipality	County	DI score	Student enroll (%)	2000-2004								2005-2009							
					Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
256	Paxton	Worcester	22.01	16.0	0	1	0	2	1.8	11	1.9	120	0	20	12	21	1.8	11	1.9	140
257	Rochester	Plymouth	21.93	6.0	1	40	42	59	3.1	58	1.0	21	2	47	54	65	3.1	66	1.0	25
258	Sheffield	Berkshire	21.59	4.0	0	7	8	11	5.3	149	2.4	149	0	10	0	3	5.3	166	2.4	171
259	Ashby	Middlesex	21.08	5.0	0	15	20	27	5.1	145	1.0	17	1	22	29	36	5.1	162	1.0	21
260	New Salem	Franklin	20.77	2.0	0	10	28	35	6.3	179	1.7	105	0	5	0	7	6.3	201	1.7	122
261	Hatfield	Hampshire	20.60	3.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
262	Hampden	Hampden	20.37	6.0	4	76	94	125	2.2	21	0.7	4	2	48	47	57	2.2	23	0.7	5
263	Brimfield	Hampden	20.27	5.0	0	11	8	12	4.4	120	1.6	103	1	36	49	59	4.4	136	1.6	120
264	Dover	Norfolk	18.34	5.0	0	4	0	1	3.0	54	1.5	89	1	30	21	27	3.0	62	1.5	105
265	Millis	Norfolk	18.29	5.0	1	20	10	15	2.9	52	1.6	97	0	18	7	14	2.9	59	1.6	113
266	Southborough	Worcester	17.84	4.0	0	14	7	10	1.6	6	1.8	119	0	2	0	4	1.6	6	1.8	139
267	Chesterfield	Hampshire	16.91	5.0	-	-	-	-	-	-	-	-	0	7	0	6	-	185	-	1
268	Goshen	Hampshire	16.85	6.0	0	12	41	56	7.9	202	1.1	31	0	12	28	32	7.9	229	1.1	37
269	Lanesborough	Berkshire	16.57	6.0	-	-	-	-	-	-	-	-	1	35	53	64	-	186	-	52
270	Medway	Norfolk	16.44	8.0	1	39	17	23	2.3	22	1.4	77	0	3	0	9	2.3	24	1.4	92
271	Norwell	Plymouth	16.18	4.0	5	97	75	104	1.9	12	0.9	15	3	59	37	45	1.9	12	0.9	19
272	Medfield	Norfolk	15.88	5.0	1	31	15	20	1.4	4	1.3	69	2	53	25	29	1.4	4	1.3	82
273	Duxbury	Plymouth	15.51	6.0	-	-	-	-	-	-	-	-	1	34	10	17	-	25	-	71
274	Carlisle	Middlesex	15.27	6.0	2	48	61	85	2.4	24	1.2	56	1	26	18	24	2.4	28	1.2	65
275	Lynnfield	Essex	14.79	5.0	0	9	2	7	2.5	28	1.1	27	2	54	25	31	2.5	34	1.1	32
<i>N/A</i>	<i>Wenham‡</i>	<i>Essex</i>	<i>14.49</i>	<i>34.0</i>	<i>0</i>	<i>13</i>	<i>10</i>	<i>13</i>	<i>3.3</i>	<i>66</i>	<i>1.0</i>	<i>22</i>	<i>1</i>	<i>32</i>	<i>29</i>	<i>35</i>	<i>3.3</i>	<i>75</i>	<i>1.0</i>	<i>26</i>
276	Wales	Hampden	14.17	4.0	0	6	0	5	3.5	76	1.0	19	0	11	15	22	3.5	86	1.0	23
277	Cheshire	Berkshire	10.10	4.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
278	Boxford	Essex	6.18	5.0	1	22	11	16	1.4	3	1.2	45	0	4	0	1	1.4	3	1.2	53

Note: Ten places with significant seasonal housing/arrests (*) or 20% or more residents in undergraduate or graduate degree programs (‡) have been grayed out and italicized, as have the state's 5 largest cities (†). Auburn and Leicester were tied in the score ranking (^), "-" indicates town did not have data in that time period.



					2010-2014								2015-2017							
Rank	Municipality	County	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
1	Holyoke	Hampden	99.52	6.0	569	290	1,880	292	30.1	291	51.0	290	565	292	1,828	294	28.6	293	54.0	293
N/A	Springfield†	Hampden	98.62	9.0	490	288	434	283	30.1	290	60.7	291	893	294	777	291	28.7	294	62.7	294
N/A	Boston†	Suffolk	98.39	16.0	3,119	292	585	290	21.9	285	41.1	286	2,421	295	432	275	20.5	289	42.1	288
2	New Bedford	Bristol	98.02	5.0	506	289	690	291	24.0	289	24.2	279	464	291	627	287	23.1	292	25.4	280
N/A	Worcester†	Worcester	97.87	14.0	741	291	520	288	22.0	286	31.6	283	710	293	478	279	21.8	290	32.7	285
3	Brockton	Plymouth	96.55	7.0	314	286	452	285	17.9	277	47.3	288	292	287	414	272	16.8	282	49.9	291
4	Lynn	Essex	95.53	7.0	239	284	350	273	20.9	283	45.5	287	334	290	476	278	18.2	285	50.5	292
5	Fall River	Bristol	94.78	6.0	324	287	462	286	23.3	288	12.0	253	310	289	436	276	20.2	288	14.8	260
6	Salem	Essex	93.23	10.0	166	281	479	287	14.4	260	20.9	275	110	280	310	256	15.3	278	22.4	276
7	Chelsea	Suffolk	92.76	4.0	106	275	390	279	22.6	287	68.1	292	89	274	307	255	19.5	287	71.7	295
N/A	Lowell†	Middlesex	92.66	12.0	286	285	340	271	19.1	281	24.9	280	307	288	358	265	22.4	291	27.0	282
8	Fitchburg	Worcester	92.33	9.0	62	261	198	230	19.8	282	27.4	281	98	279	312	258	17.9	284	29.9	284
N/A	Amherst‡	Hampshire	90.82	60.0	119	276	335	270	33.8	292	11.9	252	47	243	129	178	33.2	295	11.7	248
9	Southbridge	Worcester	90.13	5.0	28	226	216	238	18.1	278	34.6	284	70	265	531	283	18.5	286	35.8	287
10	Haverhill	Essex	88.80	6.0	166	280	348	272	12.2	246	19.4	270	241	286	498	280	12.6	262	23.4	278
11	Pittsfield	Berkshire	88.58	5.0	90	273	254	251	16.4	271	10.8	245	87	273	248	239	15.1	276	10.4	239
12	West Springfield	Hampden	88.56	8.0	61	259	274	255	11.0	233	12.6	259	58	253	256	244	12.1	258	14.2	259
13	Greenfield	Franklin	88.42	8.0	51	250	359	276	14.9	264	7.5	222	72	266	503	281	13.2	265	9.3	229
14	Taunton	Bristol	87.62	5.0	130	277	294	257	13.1	253	11.9	250	97	277	217	231	13.8	269	13.4	256
15	Revere	Suffolk	87.30	7.0	61	257	141	198	15.5	268	30.4	282	60	257	138	185	13.0	263	35.5	286
16	Barnstable	Barnstable	87.01	5.0	202	282	547	289	13.0	252	6.9	214	142	282	388	271	9.1	220	8.6	224
17	Everett	Middlesex	86.66	7.0	66	266	200	231	13.8	257	36.8	285	66	260	192	223	13.9	270	42.2	289
18	Webster	Worcester	85.66	5.0	41	244	301	260	15.1	267	12.4	258	45	242	336	263	12.0	257	15.8	263
19	Northampton	Hampshire	85.00	15.0	56	254	236	245	14.6	262	10.3	239	60	256	254	241	15.0	275	11.1	245
20	Chicopee	Hampden	84.22	7.0	61	258	139	197	12.9	250	19.5	271	52	251	116	172	14.4	273	23.6	279
21	Quincy	Norfolk	83.36	9.0	207	283	267	254	10.0	223	8.5	230	202	284	254	242	10.5	239	8.2	217
22	Gardner	Worcester	83.14	5.0	32	232	197	229	17.6	276	10.0	238	45	241	278	251	16.7	281	10.0	235
23	Leominster	Worcester	82.70	6.0	52	251	159	211	11.7	241	19.9	273	51	249	160	201	13.4	267	22.7	277
N/A	Nantucket*	Nantucket	81.69	6.0	13	178	155	210	9.2	213	15.4	266	25	213	291	253	11.2	248	16.6	267
24	Randolph	Norfolk	81.03	9.0	55	253	211	236	11.4	239	48.1	289	49	244	180	217	11.3	251	46.3	290
25	Malden	Middlesex	80.42	11.0	63	263	130	187	16.8	272	24.0	278	43	238	87	134	15.9	279	25.7	281



					2010-2014								2015-2017							
Rank	Municipality	County	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
26	Attleboro	Bristol	80.33	5.0	87	271	259	253	9.2	214	10.3	241	93	276	272	249	9.2	222	10.0	234
27	North Adams	Berkshire	79.71	13.0	22	211	193	226	18.9	280	5.3	177	61	258	547	284	17.8	283	5.3	163
28	Falmouth	Barnstable	78.67	3.0	55	252	212	237	8.3	196	5.9	192	98	278	369	268	6.4	173	5.5	175
29	Weymouth	Norfolk	78.64	6.0	156	279	358	275	6.6	163	5.9	190	149	283	331	260	6.6	179	8.1	215
30	Dennis	Barnstable	78.24	5.0	40	243	327	266	15.5	269	5.3	176	41	236	335	262	10.9	243	6.4	191
31	Methuen	Essex	78.01	8.0	143	278	388	278	9.1	211	23.3	276	224	285	581	286	9.4	224	29.6	283
32	Spencer	Worcester	77.53	4.0	28	225	300	259	11.4	237	5.5	181	14	179	140	186	12.2	259	4.1	124
33	Stoughton	Norfolk	77.14	6.0	45	248	202	233	7.1	173	13.6	262	69	263	300	254	8.3	211	18.5	270
34	Peabody	Essex	77.07	6.0	65	264	155	207	7.7	186	9.7	236	76	270	175	214	9.8	231	12.0	249
35	Wareham	Plymouth	77.04	4.0	60	256	329	268	9.8	222	3.6	128	43	237	234	234	11.7	255	5.2	159
N/A	Provincetown*	Barnstable	76.25	3.0	7	131	240	248	13.5	256	8.1	226	5	106	195	225	10.7	241	7.2	207
36	Yarmouth	Barnstable	76.16	5.0	62	260	306	263	8.3	195	4.0	147	75	269	375	270	6.9	187	3.7	115
37	Palmer	Hampden	75.91	7.0	37	241	387	277	10.3	226	3.0	100	83	272	828	293	14.1	271	5.5	176
38	Somerville	Middlesex	74.19	15.0	69	268	103	162	15.5	270	16.0	267	58	254	82	129	12.4	261	16.0	264
39	Plymouth	Plymouth	74.10	5.0	89	272	195	227	6.8	171	4.3	152	77	271	163	202	6.4	174	4.5	136
40	Braintree	Norfolk	73.78	5.0	91	274	322	264	5.3	127	7.4	219	73	268	255	243	5.0	119	5.4	172
41	Middleborough	Plymouth	73.61	5.0	43	246	234	244	8.1	190	3.7	135	39	235	203	227	7.9	199	4.3	132
42	Mashpee	Barnstable	73.55	5.0	29	229	254	252	8.1	191	4.3	155	26	215	217	232	6.1	164	4.5	137
43	Medford	Middlesex	73.26	13.0	57	255	117	173	10.5	228	13.3	261	51	248	104	160	10.3	235	13.8	257
44	Salisbury	Essex	73.06	7.0	30	230	425	281	8.3	197	1.6	41	59	255	783	292	9.7	229	3.6	109
45	Woburn	Middlesex	72.61	5.0	36	240	115	172	6.8	170	8.9	232	66	261	208	228	6.0	160	9.2	228
46	Beverly	Essex	72.37	12.0	62	262	189	223	8.6	205	5.2	172	32	230	92	142	8.3	207	5.0	151
47	Marlborough	Middlesex	71.85	6.0	35	239	113	170	7.4	183	14.6	265	20	204	63	99	6.5	176	15.6	261
48	Westfield	Hampden	71.63	13.0	35	237	106	164	10.9	231	10.5	243	49	245	146	192	8.5	215	9.9	232
49	Oak Bluffs	Dukes	71.60	1.0	11	163	303	261	11.4	236	2.6	88	9	146	270	248	12.2	260	5.0	152
50	Norwood	Norfolk	71.44	7.0	67	267	295	258	8.2	193	8.8	231	38	234	163	204	8.3	208	12.4	253
51	Montague	Franklin	71.43	4.0	9	150	141	199	17.6	275	5.4	178	11	161	164	205	15.2	277	5.7	179
N/A	Cambridge‡ †	Middlesex	70.99	27.0	66	265	70	114	15.0	265	18.0	269	72	267	74	118	13.5	268	18.8	272
52	Sturbridge	Worcester	70.88	3.0	30	231	440	284	6.7	167	3.6	126	52	250	734	290	4.0	65	3.4	107
53	Andover	Essex	70.76	8.0	38	242	151	205	4.4	84	6.0	195	64	259	244	237	4.4	93	6.2	187



					2010-2014								2015-2017							
Rank	Municipality	County	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
54	Raynham	Bristol	70.15	5.0	20	205	193	225	7.2	177	6.8	213	30	228	284	252	6.4	172	6.7	197
55	Agawam	Hampden	69.81	6.0	43	247	189	222	9.3	216	6.7	211	23	209	100	151	9.4	223	8.1	216
56	Truro	Barnstable	69.57	1.0	7	133	423	280	13.1	254	1.6	42	8	128	579	285	11.2	247	1.8	36
57	Bourne	Barnstable	69.04	7.0	29	228	178	219	11.6	240	5.7	183	67	262	417	273	6.9	185	6.0	185
58	Clinton	Worcester	68.83	8.0	12	174	109	166	8.8	206	11.9	251	4	85	33	53	6.0	157	17.7	268
59	Waltham	Middlesex	68.81	18.0	47	249	89	148	10.4	227	19.8	272	56	252	103	158	9.8	230	19.9	273
60	West Bridgewater	Plymouth	68.72	6.0	18	198	332	269	4.1	66	9.9	237	17	195	311	257	3.6	44	6.0	184
61	Dudley	Worcester	68.64	15.0	15	182	164	213	9.1	212	3.8	139	14	184	157	198	7.8	197	4.3	131
62	Maynard	Middlesex	68.49	6.0	19	202	237	247	9.4	217	6.4	203	12	164	140	187	8.1	202	6.9	199
63	Milford	Worcester	68.06	5.0	26	221	122	181	10.9	232	11.3	247	23	208	103	159	7.9	200	14.1	258
64	Ware	Hampshire	67.84	6.0	16	187	201	232	14.9	263	2.3	71	27	221	347	264	14.3	272	7.0	201
65	Framingham	Middlesex	67.51	8.0	74	270	134	192	11.3	235	20.8	274	119	281	209	229	11.5	254	21.8	275
66	Monson	Hampden	67.29	5.0	16	192	236	246	8.2	192	2.0	57	26	214	362	266	5.6	141	2.6	74
67^	Auburn	Worcester	67.28	7.0	33	235	250	250	4.4	87	5.8	186	32	231	237	235	4.6	102	5.6	177
67^	Leicester	Worcester	67.28	10.0	32	234	351	274	5.1	119	6.4	205	9	145	95	146	5.6	143	5.1	154
68	Abington	Plymouth	65.98	6.0	26	220	209	234	2.9	29	3.1	103	69	264	528	282	3.6	42	5.0	150
69	Hadley	Hampshire	65.82	7.0	6	122	135	194	7.5	185	7.3	218	8	137	187	220	5.4	134	12.4	254
70	Athol	Worcester	65.80	4.0	12	175	132	190	17.4	274	7.5	220	16	190	170	210	14.7	274	6.3	189
71	Great Barrington	Berkshire	65.71	11.0	7	137	124	183	8.5	203	14.2	264	10	151	179	215	5.2	127	15.6	262
72	Wilbraham	Hampden	65.55	5.0	21	208	186	221	4.8	106	4.6	167	28	224	243	236	4.0	66	7.0	200
73	Ludlow	Hampden	65.53	5.0	26	219	148	204	5.9	148	6.9	215	45	240	260	246	5.8	153	9.1	227
74	Fairhaven	Bristol	65.24	6.0	28	224	210	235	10.8	230	1.2	25	23	210	180	216	9.1	221	2.3	62
75	Easthampton	Hampshire	64.69	10.0	11	158	78	132	8.3	198	5.2	171	12	168	88	137	10.7	240	8.4	221
76	Winchendon	Worcester	64.58	6.0	10	152	122	179	12.1	244	3.7	137	9	138	105	162	11.2	246	5.1	153
77	Tewksbury	Middlesex	62.98	6.0	72	269	303	262	4.0	64	3.6	124	91	275	371	269	5.4	133	3.1	96
78	Watertown	Middlesex	62.70	8.0	24	215	88	145	7.3	182	11.6	249	27	220	93	143	8.4	214	11.4	247
79	Holbrook	Norfolk	62.58	9.0	-	-	-	-	-	-	-	-	10	150	105	161	6.7	182	18.2	269
80	Amesbury	Essex	62.05	4.0	19	203	145	202	4.3	78	2.5	83	29	227	214	230	4.9	117	3.5	108
81	Hull	Plymouth	61.38	4.0	17	194	195	228	5.9	146	3.8	140	15	189	169	209	4.9	116	4.1	127
82	Danvers	Essex	60.49	6.0	33	236	155	208	4.9	113	3.9	145	28	223	126	175	6.3	171	5.4	166



					2010-2014								2015-2017							
Rank	Municipality	County	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
83	Lunenburg	Worcester	59.99	6.0	19	199	225	242	9.8	221	6.0	198	22	205	256	245	8.3	212	8.5	222
84	Walpole	Norfolk	59.26	5.0	25	217	135	193	3.4	46	4.6	165	31	229	165	206	2.8	27	6.5	192
85	Concord	Middlesex	58.82	3.0	7	129	45	76	5.0	115	7.6	223	9	139	58	91	6.3	169	9.7	230
86	Northbridge	Worcester	58.75	4.0	16	188	130	186	6.0	149	2.8	97	14	183	114	169	8.4	213	5.9	183
87	Whitman	Plymouth	58.66	5.0	32	233	281	256	6.1	153	2.7	92	17	194	148	193	6.9	186	2.9	88
88	Newburyport	Essex	58.51	4.0	27	222	191	224	7.4	184	3.4	117	22	207	156	197	7.0	189	3.3	103
89	North Attleborough	Bristol	58.23	6.0	10	154	47	81	4.2	73	3.7	134	14	181	62	96	7.3	195	6.7	196
90	Orleans	Barnstable	57.34	1.0	8	142	153	206	4.8	104	2.4	76	7	126	145	190	7.2	193	5.4	169
91	Brookline	Norfolk	57.15	13.0	42	245	86	144	11.8	242	8.1	225	5	98	10	18	11.4	252	8.9	226
92	Lenox	Berkshire	56.87	6.0	4	90	98	157	13.3	255	3.6	131	8	132	195	224	3.8	54	4.6	140
93	Somerset	Bristol	56.38	5.0	19	200	127	185	7.9	188	1.5	38	37	232	245	238	6.7	184	0.9	11
94	Saugus	Essex	55.77	5.0	28	227	126	184	6.0	151	5.9	191	14	180	59	92	8.1	203	7.5	208
95	Oxford	Worcester	55.68	9.0	5	110	51	89	5.0	114	5.1	170	12	169	114	170	10.9	244	6.6	195
96	Seekonk	Bristol	55.51	5.0	15	184	133	191	5.1	120	2.6	89	50	246	420	274	5.5	138	2.2	51
97	Hopedale	Worcester	55.13	3.0	19	201	432	282	2.4	14	5.8	187	12	173	273	250	4.2	78	4.4	134
98	West Boylston	Worcester	54.95	4.0	4	94	66	110	5.4	132	10.7	244	2	53	29	43	8.3	206	16.6	266
99	Winthrop	Suffolk	54.49	7.0	12	171	80	135	8.5	204	9.5	235	5	103	34	54	8.2	205	12.2	252
100	Mansfield	Bristol	54.32	7.0	22	210	130	188	4.1	67	5.4	179	18	199	103	157	2.7	24	5.5	173
101	Shrewsbury	Worcester	54.21	6.0	11	167	41	70	5.0	116	6.1	199	12	166	43	71	4.6	99	8.3	219
102	Boxborough	Middlesex	53.86	8.0	9	148	233	243	4.4	83	0.9	18	8	134	190	221	5.3	131	3.8	119
103	Gloucester	Essex	53.82	4.0	20	206	84	140	9.7	220	3.5	123	51	247	203	226	8.5	216	3.0	89
104	Chelmsford	Middlesex	53.77	6.0	24	216	90	149	3.5	48	3.2	108	24	211	85	131	3.6	43	4.5	135
105	Orange	Franklin	53.76	5.0	6	124	99	159	12.5	248	2.3	73	10	155	167	207	10.3	234	1.8	34
106	Tisbury	Dukes	53.67	1.0	2	65	73	121	18.2	279	2.3	69	6	108	168	208	6.9	188	10.7	241
107	South Hadley	Hampshire	53.37	19.0	10	153	65	109	9.2	215	8.4	229	12	167	78	123	10.4	237	8.3	220
N/A	Williamstown ‡	Berkshire	53.32	35.0	5	105	74	123	6.7	169	6.5	206	9	141	134	181	11.5	253	12.2	251
108	Warren	Worcester	53.13	4.0	5	103	123	182	15.0	266	0.8	17	27	222	665	289	11.3	249	1.9	41
109	Ayer	Middlesex	52.95	10.0	3	75	52	91	12.8	249	8.3	228	2	57	36	61	13.4	266	10.9	242
110	Harwich	Barnstable	52.72	4.0	12	169	112	169	7.3	178	3.8	138	15	188	148	194	6.7	183	3.7	114
111	Williamsburg	Hampshire	52.68	3.0	5	104	222	241	10.2	224	4.5	161	9	147	454	277	10.8	242	1.7	30



					2010-2014								2015-2017							
Rank	Municipality	County	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
112	Edgartown	Dukes	52.50	3.0	12	172	328	267	5.7	142	1.9	55	9	148	254	240	5.1	125	3.3	101
113	Hudson	Middlesex	51.95	6.0	9	146	56	95	6.4	158	4.6	164	4	82	23	31	5.9	156	8.0	214
114	Sutton	Worcester	51.77	4.0	12	170	170	214	3.7	53	0.6	13	16	191	229	233	2.1	13	3.3	100
115	Pelham	Hampshire	51.43	4.0	1	39	122	180	5.7	141	12.2	257	2	47	191	222	4.0	64	5.2	157
116	Ashland	Middlesex	51.35	5.0	11	162	83	138	4.0	65	6.0	193	11	163	84	130	3.2	36	7.9	212
117	Bellingham	Norfolk	51.31	6.0	18	197	135	195	3.0	31	2.1	65	44	239	333	261	4.2	75	4.0	123
118	Douglas	Worcester	51.04	4.0	11	165	177	217	4.2	74	4.2	151	9	143	138	184	4.1	73	8.0	213
119	Chatham	Barnstable	50.99	4.0	3	73	57	98	8.9	207	7.3	217	1	29	19	27	9.5	228	5.8	180
120	Canton	Norfolk	50.91	5.0	16	191	95	153	6.2	155	10.3	240	8	135	47	78	6.0	161	10.3	238
121	Dartmouth	Bristol	50.78	18.0	23	213	79	134	6.5	162	5.0	169	18	198	62	97	8.2	204	5.4	171
122	Bridgewater	Plymouth	50.62	20.0	7	130	31	45	7.3	180	10.9	246	24	212	106	164	9.5	226	11.4	246
123	Natick	Middlesex	50.58	6.0	20	207	78	131	4.0	62	4.7	168	17	196	64	101	3.6	41	5.6	178
124	East Bridgewater	Plymouth	50.26	6.0	16	190	147	203	3.3	43	1.9	56	11	159	103	156	6.6	181	5.2	161
125	Sandwich	Barnstable	50.11	7.0	27	223	171	216	5.6	138	2.2	68	27	218	163	203	5.7	147	2.8	83
N/A	Sunderland‡	Franklin	50.08	24.0	0	14	6	13	21.5	284	6.0	197	1	36	43	70	16.4	280	10.1	236
126	Franklin	Norfolk	49.09	8.0	17	196	73	120	3.8	55	3.9	143	13	174	52	83	4.3	85	3.1	93
127	Wakefield	Middlesex	48.76	5.0	35	238	171	215	4.6	96	3.1	102	26	217	121	174	4.4	91	5.0	149
128	Swansea	Bristol	48.38	4.0	12	173	92	151	5.2	125	1.5	37	12	165	91	140	5.5	137	0.8	8
129	Erving	Franklin	48.23	4.0	2	45	114	171	8.5	201	5.5	180	26	216	1,834	295	8.9	219	2.6	75
130	Billerica	Middlesex	48.03	6.0	26	218	78	133	5.6	139	4.5	160	28	225	81	127	4.3	82	7.5	209
131	North Andover	Essex	48.02	9.0	7	132	31	44	4.6	95	6.7	210	37	233	160	200	5.1	124	8.6	223
132	Northborough	Worcester	47.82	6.0	12	176	112	167	2.9	25	5.2	173	13	175	110	167	3.7	49	4.8	144
133	Georgetown	Essex	47.10	4.0	15	185	245	249	2.6	16	1.5	35	9	144	138	183	3.4	38	4.4	133
134	Uxbridge	Worcester	47.09	6.0	11	166	105	163	5.4	135	1.8	50	19	203	181	219	8.3	209	3.9	122
135	Wellesley	Norfolk	46.86	18.0	15	183	69	112	3.5	47	6.9	216	10	154	47	77	4.4	88	7.6	210
136	Adams	Berkshire	46.81	3.0	8	141	122	178	11.4	238	1.6	40	7	118	100	152	11.1	245	1.7	29
137	Burlington	Middlesex	46.78	6.0	24	214	120	175	4.7	100	5.7	184	13	177	63	100	4.0	63	7.2	205
138	Plainville	Norfolk	46.61	5.0	11	161	160	212	5.3	129	0.6	10	12	170	174	213	6.2	167	0.9	10
139	Deerfield	Franklin	46.16	6.0	3	78	84	139	6.2	154	3.1	104	11	158	266	247	8.3	210	5.3	164
140	Lee	Berkshire	46.00	6.0	4	84	74	122	9.5	218	3.2	106	3	67	57	89	8.0	201	3.4	105



					2010-2014								2015-2017							
Rank	Municipality	County	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
141	Mendon	Worcester	45.93	4.0	9	149	216	239	1.9	6	5.7	185	17	193	367	267	0.5	1	1.3	17
142	Newton	Middlesex	45.87	12.0	22	212	33	51	5.6	140	8.9	233	19	201	27	40	4.3	81	8.6	225
143	Wilmington	Middlesex	45.54	6.0	17	195	100	160	2.2	10	2.5	85	18	197	98	149	2.9	30	4.1	128
144	Brewster	Barnstable	45.39	3.0	10	155	118	174	7.0	172	2.1	59	9	149	113	168	4.8	113	2.4	65
145	Westport	Bristol	45.37	6.0	17	193	131	189	3.4	45	0.4	5	15	186	118	173	4.5	96	0.7	6
146	Lakeville	Plymouth	45.21	6.0	7	134	81	137	4.5	92	2.7	96	28	226	320	259	3.2	35	2.6	71
147	Hardwick	Worcester	45.20	4.0	1	34	41	68	14.5	261	4.6	163	15	187	645	288	12.0	256	2.9	87
148	Carver	Plymouth	45.10	5.0	12	177	136	196	5.4	134	2.5	80	8	136	91	139	4.6	97	3.0	91
149	North Reading	Middlesex	44.93	5.0	13	179	109	165	4.5	90	2.5	84	22	206	180	218	3.4	37	2.5	69
N/A	Chilmark*	Dukes	44.86	5.0	1	41	184	220	13.9	258	0.7	15	0	17	36	60	13.1	264	5.4	167
150	Eastham	Barnstable	44.79	2.0	4	89	85	142	5.1	121	2.1	62	6	109	128	177	6.6	180	3.7	116
151	Marshfield	Plymouth	44.39	6.0	22	209	112	168	5.4	133	1.1	24	27	219	135	182	6.2	166	1.5	21
152	Northfield	Franklin	44.25	6.0	5	108	218	240	3.9	59	2.5	82	3	78	142	188	4.0	59	2.3	56
153	Kingston	Plymouth	44.10	6.0	15	181	145	200	4.3	80	4.1	150	4	92	39	64	6.6	178	2.3	63
154	Grafton	Worcester	44.07	6.0	6	114	41	71	7.2	176	6.1	200	4	94	31	47	5.7	150	10.2	237
155	Rowley	Essex	43.62	4.0	5	100	102	161	9.0	208	1.7	45	8	131	171	211	5.5	136	1.1	13
156	Southwick	Hampden	43.57	5.0	4	96	57	99	2.9	28	0.6	8	11	162	145	191	7.2	194	0.3	2
157	Westborough	Worcester	43.45	4.0	8	144	60	103	4.4	89	9.5	234	5	100	34	55	5.1	122	7.1	204
158	Hingham	Plymouth	43.25	4.0	9	147	52	90	3.9	61	1.4	31	16	192	96	147	5.7	148	1.8	32
N/A	Wellfleet*	Barnstable	43.14	4.0	2	59	81	136	14.0	259	1.4	32	3	76	106	165	11.3	250	2.5	68
159	Arlington	Middlesex	42.86	5.0	15	186	44	72	4.4	88	5.6	182	12	171	35	58	5.2	126	6.2	186
160	Blackstone	Worcester	42.34	5.0	5	111	77	128	5.1	122	6.0	196	10	156	143	189	4.0	61	4.6	139
161	Harvard	Worcester	42.10	4.0	2	52	40	63	9.0	210	13.3	260	3	63	52	82	5.2	128	10.4	240
162	Marblehead	Essex	42.00	4.0	11	159	70	115	4.9	110	3.2	110	4	87	24	34	4.6	101	4.8	147
163	Barre	Worcester	41.73	6.0	13	180	326	265	4.2	72	1.5	34	6	114	149	196	5.7	149	3.6	112
164	Holland	Hampden	41.56	4.0	-	-	-	-	-	-	-	-	3	65	134	180	4.1	71	3.7	117
165	Foxborough	Norfolk	41.54	4.0	16	189	120	176	4.2	76	3.7	132	14	182	102	154	4.9	115	8.2	218
166	Lincoln	Middlesex	41.42	7.0	2	49	37	56	3.9	60	10.3	242	3	66	56	86	2.7	25	12.1	250
167	Tyngsborough	Middlesex	41.04	6.0	6	118	63	106	7.1	174	3.3	116	7	124	76	119	7.1	191	3.6	111
168	Marion	Plymouth	40.86	3.0	3	79	88	146	4.6	97	2.7	95	2	60	61	94	5.6	140	2.7	78
169	Sherborn	Middlesex	40.85	2.0	4	86	121	177	2.0	8	1.0	20	3	69	99	150	4.2	74	3.3	102



					2010-2014								2015-2017							
Rank	Municipality	County	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
170	Belchertown	Hampshire	40.83	8.0	4	85	32	48	7.8	187	3.5	122	5	101	43	73	5.8	152	1.7	25
171	Pembroke	Plymouth	40.68	6.0	20	204	145	201	4.1	70	2.8	98	13	178	95	145	4.2	76	2.3	59
172	Easton	Bristol	40.22	12.0	10	157	56	96	3.5	49	8.2	227	13	176	69	112	4.7	109	6.6	194
173	Granby	Hampshire	39.99	5.0	4	95	89	147	5.8	145	5.9	189	4	83	71	114	5.5	135	6.2	188
174	Charlton	Worcester	39.83	7.0	6	121	60	102	4.9	111	1.5	36	7	122	67	109	4.7	106	2.7	79
175	Acushnet	Bristol	39.68	8.0	7	135	86	143	4.1	69	2.7	94	7	125	85	132	4.1	70	2.2	52
176	Acton	Middlesex	39.24	5.0	6	128	39	59	3.0	35	2.7	90	8	133	47	79	3.8	53	4.2	130
177	Swampscott	Essex	39.04	6.0	8	145	78	129	4.7	102	5.3	174	6	113	57	87	6.1	165	4.1	129
178	Melrose	Middlesex	38.98	8.0	11	160	49	85	3.9	57	6.5	207	6	117	28	41	3.9	57	6.8	198
N/A	Stockbridge*	Berkshire	38.94	3.0	0	18	22	34	12.0	243	4.6	166	2	50	116	171	9.4	225	5.4	170
179	Holliston	Middlesex	38.80	5.0	5	112	53	92	4.0	63	3.3	114	4	89	37	62	1.4	5	4.8	145
180	Hubbardston	Worcester	38.62	7.0	3	74	91	150	6.5	160	2.6	87	0	5	0	12	2.4	21	5.2	158
181	East Longmeadow	Hampden	38.61	7.0	6	123	48	84	5.1	123	6.5	208	19	202	148	195	4.5	95	7.2	206
182	Dedham	Norfolk	38.47	7.0	4	87	19	28	4.4	86	11.6	248	2	41	8	16	5.0	120	16.1	265
183	Dracut	Middlesex	38.45	7.0	2	54	9	15	5.0	118	8.0	224	9	140	36	59	7.2	192	9.9	233
184	Millbury	Worcester	38.45	7.0	5	106	45	75	6.1	152	3.8	141	5	99	43	72	6.0	159	2.2	46
185	Shirley	Middlesex	38.35	3.0	1	30	13	21	12.1	245	23.3	277	2	52	32	49	10.3	233	20.0	274
186	East Brookfield	Worcester	37.96	6.0	1	25	33	49	4.9	107	1.8	52	3	68	157	199	4.8	110	2.3	58
187	Freetown	Bristol	37.93	5.0	5	109	75	124	4.8	105	1.0	23	8	127	106	163	5.9	154	2.1	45
188	Millville	Worcester	37.71	4.0	2	64	93	152	9.0	209	4.0	148	1	30	41	67	4.4	89	1.6	24
189	Ashburnham	Worcester	37.53	9.0	3	70	59	101	8.4	200	2.2	66	2	49	44	75	4.8	111	2.6	72
190	Littleton	Middlesex	37.41	6.0	5	113	77	127	3.9	58	1.3	30	3	79	44	74	3.8	55	1.4	20
191	Pepperell	Middlesex	37.36	6.0	3	80	39	58	4.9	112	3.6	130	3	64	29	44	5.6	142	3.8	118
192	Boylston	Worcester	36.65	5.0	1	35	30	42	3.1	36	2.5	78	3	71	86	133	4.1	69	2.9	86
193	Dalton	Berkshire	36.44	6.0	1	29	15	25	17.1	273	4.0	149	4	95	79	125	10.3	236	2.4	64
194	West Brookfield	Worcester	36.35	7.0	3	69	84	141	7.2	175	4.3	156	1	23	22	29	6.5	175	1.9	40
195	Lancaster	Worcester	36.21	6.0	1	22	9	17	12.3	247	12.1	255	4	84	57	90	5.3	130	11.1	244
196	Belmont	Middlesex	36.11	6.0	6	120	30	43	5.8	143	7.5	221	6	112	31	46	5.5	139	6.3	190
197	Hanson	Plymouth	35.91	7.0	5	99	59	100	3.8	56	3.9	144	7	120	78	124	3.4	39	1.8	31
198	Hamilton	Essex	35.42	9.0	1	32	13	22	3.2	42	5.3	175	4	91	69	111	10.2	232	2.1	42



					2010-2014								2015-2017							
Rank	Municipality	County	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
199	Hopkinton	Middlesex	35.25	5.0	8	139	70	116	2.2	9	2.4	74	8	129	67	106	1.5	6	4.7	141
200	Upton	Worcester	34.67	5.0	2	63	40	66	6.5	161	1.5	39	5	102	87	135	4.8	114	4.1	125
201	Groveland	Essex	34.65	6.0	4	83	69	111	2.7	18	3.2	112	1	35	25	37	2.4	22	4.8	146
202	Wrentham	Norfolk	34.54	7.0	8	143	99	158	5.2	126	1.2	26	7	121	77	122	5.1	121	4.9	148
203	Westwood	Norfolk	33.41	4.0	8	140	75	125	2.8	23	3.1	101	11	160	96	148	1.9	11	2.2	47
204	Berlin	Worcester	32.92	6.0	0	11	9	16	2.7	19	3.3	113	2	61	93	144	2.9	29	1.5	22
205	Lexington	Middlesex	32.91	6.0	11	164	46	78	4.4	82	3.0	99	1	34	5	13	3.6	46	2.8	84
206	Norton	Bristol	32.77	15.0	1	28	5	12	6.0	150	2.4	75	2	38	10	20	5.6	144	5.2	160
207	North Brookfield	Worcester	32.61	8.0	2	51	50	87	6.6	165	2.3	72	0	8	0	10	6.3	170	2.2	48
208	Holden	Worcester	32.60	6.0	10	151	71	117	2.6	15	3.3	115	9	142	64	102	4.7	107	5.5	174
209	Stoneham	Middlesex	32.36	6.0	6	119	33	50	4.5	93	4.3	154	10	157	57	88	4.3	84	5.4	165
210	Milton	Norfolk	32.26	11.0	2	66	12	18	4.4	85	17.9	268	4	93	19	28	4.1	72	18.7	271
211	Longmeadow	Hampden	32.24	7.0	6	116	47	82	5.3	130	4.4	157	3	74	25	35	3.6	45	5.2	162
212	Norfolk	Norfolk	31.92	4.0	2	68	27	37	4.6	94	12.1	256	6	107	62	98	2.8	28	13.2	255
213	Bolton	Worcester	31.86	5.0	6	115	155	209	2.7	20	3.9	142	3	70	81	126	1.4	3	4.1	126
214	Sharon	Norfolk	31.76	5.0	5	107	39	60	2.7	17	6.2	201	4	88	30	45	2.0	12	7.1	202
215	Bedford	Middlesex	31.50	5.0	5	98	45	73	4.2	71	6.0	194	6	111	53	84	2.5	23	7.1	203
216	Templeton	Worcester	31.40	5.0	5	97	72	119	10.6	229	0.4	6	3	62	40	65	4.4	94	1.3	18
217	Needham	Norfolk	31.06	5.0	6	125	29	40	3.2	38	4.5	162	10	153	45	76	3.0	32	4.7	143
218	Rehoboth	Bristol	30.98	8.0	7	136	78	130	3.2	39	0.6	12	6	116	67	108	2.3	17	3.1	95
219	Dunstable	Middlesex	30.76	7.0	4	93	178	218	1.3	2	0.3	3	2	58	92	141	2.1	14	1.1	14
220	Newbury	Essex	30.76	9.0	3	77	63	105	4.9	109	1.0	21	10	152	173	212	4.2	80	3.1	94
221	Mattapoisett	Plymouth	30.52	7.0	3	72	64	107	4.8	103	0.7	14	4	86	72	115	4.6	103	1.7	27
222	Townsend	Middlesex	30.43	5.0	2	56	29	41	4.5	91	1.8	51	5	104	74	117	4.0	68	3.0	90
223	Halifax	Plymouth	30.20	5.0	6	117	98	156	1.9	7	3.7	133	3	73	49	81	4.6	104	5.2	156
224	Ipswich	Essex	30.01	6.0	3	76	31	46	5.8	144	1.7	43	7	123	67	107	7.1	190	3.9	120
225	Groton	Middlesex	29.72	5.0	4	88	46	79	3.7	51	2.7	93	6	110	66	105	4.3	83	1.8	35
226	Stow	Middlesex	29.71	5.0	5	102	96	155	3.0	34	3.4	118	2	42	32	50	4.4	92	2.5	70
227	Nahant	Essex	29.61	4.0	2	50	62	104	5.0	117	6.4	204	2	55	66	104	4.8	112	2.4	66
228	West Newbury	Essex	29.55	5.0	1	40	45	74	8.5	202	3.5	120	3	72	88	138	5.7	145	1.0	12



					2010-2014								2015-2017							
Rank	Municipality	County	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
229	Sterling	Worcester	29.22	5.0	2	61	37	57	4.7	101	3.4	119	1	24	11	21	6.0	158	5.2	155
230	Sudbury	Middlesex	29.09	4.0	4	91	32	47	1.9	5	2.1	63	6	115	48	80	3.1	34	2.4	67
231	Princeton	Worcester	28.88	6.0	1	26	23	35	6.7	168	6.8	212	2	43	60	93	6.5	177	3.9	121
232	Scituate	Plymouth	28.38	4.0	10	156	75	126	3.0	30	1.9	54	12	172	88	136	4.2	79	1.8	37
233	Whately	Franklin	28.36	8.0	0	16	18	26	3.2	40	2.4	77	0	13	29	42	7.6	196	3.7	113
234	Weston	Middlesex	28.27	9.0	5	101	55	93	2.9	26	6.7	209	2	59	27	39	5.1	123	5.8	181
235	Topsfield	Essex	28.13	5.0	0	17	8	14	5.3	128	0.1	2	4	90	82	128	1.4	4	1.3	16
236	Berkley	Bristol	27.92	5.0	2	57	46	77	5.9	147	3.2	109	3	77	66	103	3.9	58	0.4	3
237	Merrimac	Essex	27.84	6.0	2	55	40	65	4.7	98	2.2	67	4	81	68	110	5.4	132	2.8	82
238	Plympton	Plymouth	27.60	7.0	2	58	95	154	3.8	54	1.8	53	2	39	71	113	4.4	87	2.8	81
239	Wayland	Middlesex	27.57	4.0	6	127	64	108	4.3	79	3.6	125	2	56	23	32	3.0	33	4.5	138
240	Middleton	Essex	27.50	5.0	0	13	3	9	4.7	99	12.0	254	1	28	13	24	3.6	47	11.0	243
N/A	Manchester-by-the-Sea*	Essex	27.45	5.0	2	60	55	94	6.6	164	2.1	64	4	96	102	155	3.7	48	1.6	23
241	Rutland	Worcester	26.43	5.0	3	71	49	86	2.3	12	3.5	121	8	130	128	176	2.3	16	2.2	49
242	Shelburne	Franklin	26.33	6.0	0	9	12	19	8.3	199	0.3	4	2	44	102	153	8.5	217	0.8	7
243	Cohasset	Norfolk	26.26	4.0	2	46	27	38	4.1	68	0.6	9	3	80	54	85	3.8	52	0.9	9
244	Reading	Middlesex	26.09	6.0	7	138	39	61	2.4	13	3.9	146	15	185	76	120	2.9	31	2.7	77
245	Gill	Franklin	25.86	5.0	0	12	15	23	7.3	179	5.8	188	0	2	0	7	5.8	151	4.7	142
246	Westford	Middlesex	25.49	6.0	11	168	70	113	2.7	21	3.2	111	19	200	107	166	2.3	19	2.6	73
247	Hanover	Plymouth	25.16	5.0	2	62	21	33	4.3	81	1.2	27	1	37	13	23	3.9	56	1.1	15
248	Leverett	Franklin	25.06	5.0	0	2	0	5	9.6	219	3.6	127	1	31	61	95	6.0	162	1.9	38
249	Oakham	Worcester	24.70	8.0	1	31	57	97	5.1	124	0.6	11	2	54	132	179	3.8	51	3.2	97
250	Winchester	Middlesex	23.89	4.0	6	126	41	69	3.0	32	2.3	70	7	119	41	69	2.3	18	2.3	61
251	Bernardston	Franklin	23.87	4.0	1	21	34	52	6.2	156	4.5	159	1	25	38	63	9.5	227	2.3	60
252	Southampton	Hampshire	23.67	3.0	2	67	51	88	4.9	108	0.9	19	2	46	34	56	4.6	98	0.1	1
253	Rockport	Essex	22.56	2.0	1	37	20	30	5.4	136	3.7	136	1	21	11	22	6.2	168	2.2	53
N/A	West Tisbury*	Dukes	22.48	4.0	1	24	29	39	8.1	189	2.5	79	2	45	76	121	3.7	50	2.1	43
254	Royalston	Worcester	22.46	3.0	0	8	0	4	13.0	251	1.8	49	0	1	0	11	10.5	238	1.7	26
255	Westminster	Worcester	22.19	7.0	4	92	72	118	2.9	27	2.5	86	2	48	34	57	1.6	7	3.6	110
256	Paxton	Worcester	22.01	16.0	2	48	47	80	3.6	50	13.9	263	0	18	8	17	4.6	105	9.8	231
257	Rochester	Plymouth	21.93	6.0	1	42	35	54	6.7	166	2.5	81	2	40	40	66	4.7	108	2.2	50



					2010-2014								2015-2017							
Rank	Municipality	County	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
258	Sheffield	Berkshire	21.59	4.0	0	4	0	8	10.2	225	1.0	22	0	6	0	8	8.7	218	0.5	5
259	Ashby	Middlesex	21.08	5.0	1	36	40	64	6.4	159	2.1	61	0	9	0	2	7.9	198	2.8	80
260	New Salem	Franklin	20.77	2.0	0	3	0	1	8.3	194	1.7	47	0	10	0	4	6.1	163	0.4	4
261	Hatfield	Hampshire	20.60	3.0	1	20	18	27	11.1	234	2.1	60	1	27	23	33	4.4	86	2.3	57
262	Hampden	Hampden	20.37	6.0	2	53	48	83	4.2	77	1.4	33	1	26	16	26	4.0	67	3.4	106
263	Brimfield	Hampden	20.27	5.0	1	23	21	31	3.0	33	1.2	28	1	33	33	52	4.2	77	3.2	99
264	Dover	Norfolk	18.34	5.0	2	47	40	67	0.3	1	6.4	202	0	14	8	14	0.8	2	7.8	211
265	Millis	Norfolk	18.29	5.0	0	1	0	3	6.3	157	3.6	129	1	22	10	19	4.4	90	5.4	168
266	Southborough	Worcester	17.84	4.0	0	15	3	10	3.3	44	2.7	91	5	105	73	116	4.6	100	3.0	92
267	Chesterfield	Hampshire	16.91	5.0	0	7	0	6	7.3	181	0.8	16	0	16	32	51	5.9	155	2.1	44
268	Goshen	Hampshire	16.85	6.0	0	5	0	2	2.8	22	1.7	46	0	3	0	6	2.4	20	3.2	98
269	Lanesborough	Berkshire	16.57	6.0	1	33	34	53	1.5	4	0.0	1	0	4	0	5	4.9	118	1.9	39
270	Medway	Norfolk	16.44	8.0	1	38	12	20	3.1	37	4.3	153	0	7	0	9	5.3	129	5.9	182
271	Norwell	Plymouth	16.18	4.0	2	43	21	32	2.3	11	1.3	29	2	51	26	38	3.6	40	2.3	54
272	Medfield	Norfolk	15.88	5.0	3	81	39	62	4.2	75	4.4	158	0	11	0	3	2.2	15	2.8	85
273	Duxbury	Plymouth	15.51	6.0	2	44	15	24	3.2	41	2.0	58	5	97	41	68	4.0	62	1.7	28
274	Carlisle	Middlesex	15.27	6.0	0	6	0	7	5.5	137	1.7	44	1	32	25	36	1.6	8	2.3	55
275	Lynnfield	Essex	14.79	5.0	3	82	36	55	1.4	3	3.2	107	3	75	31	48	1.8	10	3.4	104
<i>N/A</i>	<i>Wenham‡</i>	<i>Essex</i>	<i>14.49</i>	<i>34.0</i>	<i>1</i>	<i>27</i>	<i>19</i>	<i>29</i>	<i>3.7</i>	<i>52</i>	<i>3.2</i>	<i>105</i>	<i>0</i>	<i>15</i>	<i>8</i>	<i>15</i>	<i>1.7</i>	<i>9</i>	<i>6.5</i>	<i>193</i>
276	Wales	Hampden	14.17	4.0	0	19	26	36	5.3	131	0.5	7	0	19	22	30	5.7	146	2.6	76
277	Cheshire	Berkshire	10.10	4.0	-	-	-	-	-	-	-	-	0	20	14	25	4.0	60	1.4	19
278	Boxford	Essex	6.18	5.0	0	10	3	11	2.8	24	1.8	48	0	12	0	1	2.8	26	1.8	33

Note: 10 places with significant seasonal housing/arrests (*) or 20% or more residents in undergraduate or graduate degree programs (‡) have been grayed out and italicized, as have the state's 5 largest cities (†). Auburn and Leicester were tied in the score ranking (^), "-" indicates town did not have data in that time period.



Table VII-8. Disproportionate Impact Scores and Score Components for Census Tracts, Large Massachusetts Cities, 2000-2017

Rank	Census Tract Name	City	DIA	Student enroll (%)	2000-2004							2005-2009								
					Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
1	Census Tract 8020	Springfield	94.81	5.0	103	242	5,037	243	49.7	242	74.6	208	76	295	3,692	293	49.7	299	74.6	265
2	Census Tract 804.01	Boston	94.15	6.0	118	244	8,387	247	36.5	214	92.6	225	102	300	7,277	303	36.5	270	92.6	282
3	Census Tract 8012	Springfield	93.05	2.0	51	213	2,693	224	40.6	228	75.4	209	70	291	3,725	294	40.6	284	75.4	266
4	Census Tract 8006	Springfield	92.53	4.0	43	206	2,600	221	63.3	248	94.6	230	49	270	2,989	284	63.3	305	94.6	287
5	Census Tract 805	Boston	92.38	14.0	57	222	3,611	234	39.8	226	95.0	233	61	280	3,850	296	39.8	282	95.0	290
6	Census Tract 7314	Worcester	91.80	7.0	101	241	3,370	233	38.1	220	62.6	193	114	301	3,795	295	38.1	276	62.6	250
7	Census Tract 902	Boston	91.09	2.0	53	217	4,469	242	33.7	204	97.0	245	62	281	5,251	301	33.7	259	97.0	302
8	Census Tract 801	Boston	90.99	6.0	122	245	4,312	240	29.8	190	72.2	202	117	302	4,129	298	29.8	242	72.2	259
9	Census Tract 7313	Worcester	90.63	11.0	99	240	3,963	238	40.5	227	54.9	185	88	298	3,493	292	40.5	283	54.9	241
10	Census Tract 924	Boston	90.18	8.0	115	243	2,882	226	37.8	218	96.9	244	99	299	2,476	276	37.8	274	96.9	301
11	Census Tract 813	Boston	89.91	16.0	62	226	2,123	216	30.5	193	93.4	227	73	294	2,491	277	30.5	245	93.4	284
12	Census Tract 803	Boston	89.80	8.0	77	235	6,957	246	29.8	189	93.7	228	67	288	6,049	302	29.8	241	93.7	285
13	Census Tract 7317	Worcester	89.60	15.0	188	247	8,829	248	28.9	184	45.2	165	169	303	7,945	304	28.9	235	45.2	221
14	Census Tract 812	Boston	89.50	12.0	52	216	2,731	225	42.3	231	87.6	221	54	276	2,868	283	42.3	287	87.6	278
15	Census Tract 903	Boston	88.90	6.0	70	232	3,703	235	35.3	210	96.5	240	48	268	2,542	278	35.3	266	96.5	297
16	Census Tract 8011.01	Springfield	88.62	5.0	41	203	2,649	223	44.2	234	71.4	201	19	198	1,228	237	44.2	290	71.4	258
17	Census Tract 8018	Springfield	87.99	14.0	55	221	1,994	210	39.3	224	91.8	224	36	244	1,301	239	39.3	280	91.8	281
18	Census Tract 817	Boston	87.71	14.0	81	237	3,204	231	26.0	171	96.1	238	65	285	2,573	279	26.0	221	96.1	295
19	Census Tract 1001	Boston	87.63	7.0	68	229	1,966	208	32.3	199	96.0	237	84	297	2,436	275	32.3	252	96.0	294
20	Census Tract 818	Boston	87.34	7.0	76	234	3,783	237	26.8	173	95.7	235	60	278	2,997	286	26.8	224	95.7	292
21	Census Tract 8019.01	Springfield	87.30	9.0	29	174	1,063	170	45.6	235	74.2	207	45	266	1,665	258	45.6	291	74.2	264
22	Census Tract 901	Boston	87.24	8.0	78	236	2,601	222	19.6	142	97.6	247	79	296	2,621	280	19.6	184	97.6	304
23	Census Tract 7315	Worcester	86.50	5.0	64	228	1,863	206	33.7	203	54.1	182	54	274	1,578	255	33.7	258	54.1	238
n/a	Census Tract 806.01z	Boston	86.49	64.0	54	219	3,145	230	38.6	222	76.2	210	51	271	2,992	285	38.6	278	76.2	267
24	Census Tract 821	Boston	84.99	7.0	55	220	1,947	207	32.7	200	96.8	242	49	269	1,748	264	32.7	253	96.8	299
25	Census Tract 8019.02	Springfield	84.88	4.0	34	185	1,381	191	45.6	236	74.2	206	18	193	727	200	45.6	292	74.2	263
26	Census Tract 904	Boston	84.61	6.0	60	225	2,892	227	30.3	191	86.6	220	62	282	3,007	287	30.3	243	86.6	277
27	Census Tract 8008	Springfield	84.37	9.0	17	140	1,276	185	51.1	244	83.3	217	13	168	938	218	51.1	301	83.3	274
28	Census Tract 7325	Worcester	83.82	11.0	45	210	3,755	236	35.8	212	22.1	106	38	248	3,143	289	35.8	268	22.1	146
29	Census Tract 1011.02	Boston	83.68	7.0	68	231	2,062	213	21.4	155	97.3	246	72	293	2,159	274	21.4	198	97.3	303



					2000-2004								2005-2009							
Rank	Census Tract Name	City	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
30	Census Tract 611.01	Boston	82.81	6.0	17	134	1,195	181	46.7	239	42.2	155	25	216	1,807	266	46.7	295	42.2	209
31	Census Tract 920	Boston	82.78	9.0	60	224	1,663	201	19.9	145	79.9	213	71	292	1,981	272	19.9	187	79.9	270
32	Census Tract 913	Boston	82.37	13.0	51	214	3,258	232	25.3	169	63.5	194	43	261	2,769	282	25.3	217	63.5	251
33	Census Tract 923	Boston	82.14	5.0	40	201	1,999	211	19.5	141	95.4	234	67	289	3,385	291	19.5	181	95.4	291
34	Census Tract 503	Boston	82.07	10.0	24	165	1,610	200	46.0	237	60.0	189	25	214	1,678	260	46.0	293	60.0	246
35	Census Tract 1002	Boston	81.81	8.0	43	205	2,468	220	19.1	138	96.4	239	54	275	3,140	288	19.1	178	96.4	296
36	Census Tract 711.01	Boston	80.86	14.0	68	230	2,393	219	27.1	179	39.4	152	44	263	1,562	252	27.1	230	39.4	204
37	Census Tract 607	Boston	80.50	8.0	19	149	2,291	218	46.7	238	45.9	166	16	184	1,885	270	46.7	294	45.9	222
38	Census Tract 712.01	Boston	80.47	6.0	35	188	3,051	228	41.3	229	45.2	164	54	272	4,690	299	41.3	285	45.2	220
39	Census Tract 820	Boston	80.45	2.0	29	177	1,463	197	30.7	194	96.7	241	38	247	1,897	271	30.7	246	96.7	298
40	Census Tract 914	Boston	79.71	7.0	35	190	2,066	214	35.5	211	84.4	219	29	230	1,690	261	35.5	267	84.4	276
41	Census Tract 1005	Boston	79.67	7.0	50	212	1,086	172	28.3	183	73.1	204	63	283	1,375	244	28.3	234	73.1	261
42	Census Tract 916	Boston	79.65	7.0	35	187	1,495	198	21.5	156	53.3	180	42	257	1,803	265	21.5	199	53.3	236
43	Census Tract 819	Boston	79.58	7.0	37	197	1,701	203	12.2	81	96.9	243	35	241	1,600	256	12.2	106	96.9	300
44	Census Tract 8007	Springfield	78.75	6.0	9	102	382	115	37.9	219	93.3	226	17	185	705	196	37.9	275	93.3	283
45	Census Tract 906	Boston	78.34	8.0	45	207	3,131	229	15.8	110	60.4	191	38	249	2,655	281	15.8	144	60.4	248
46	Census Tract 701.01	Boston	77.84	29.0	175	246	5,859	244	34.4	206	11.1	70	259	305	8,662	305	34.4	261	11.1	89
47	Census Tract 8013	Springfield	77.77	8.0	29	176	896	161	35.0	207	81.1	215	26	217	797	204	35.0	263	81.1	272
48	Census Tract 919	Boston	77.60	5.0	33	183	1,400	192	29.0	187	94.7	231	44	262	1,855	268	29.0	238	94.7	288
49	Census Tract 1203.01	Boston	77.09	12.0	45	209	1,267	183	22.7	162	69.5	200	66	286	1,837	267	22.7	207	69.5	257
50	Census Tract 918	Boston	76.90	7.0	45	208	2,003	212	22.3	160	78.1	211	35	243	1,575	254	22.3	204	78.1	268
51	Census Tract 915	Boston	76.54	5.0	48	211	1,514	199	22.5	161	66.2	196	54	273	1,704	262	22.5	205	66.2	253
52	Census Tract 7320.01	Worcester	76.39	7.0	83	238	4,421	241	54.3	245	81.3	216	23	210	1,204	235	54.3	302	81.3	273
53	Census Tract 917	Boston	76.39	8.0	37	196	1,679	202	16.7	121	68.9	198	46	267	2,099	273	16.7	158	68.9	255
n/a	Census Tract 808.01‡	Boston	76.32	52.0	39	200	1,748	204	43.1	233	39.8	153	30	232	1,377	246	43.1	289	39.8	205
54	Census Tract 8022	Springfield	76.23	4.0	13	127	622	139	36.1	213	51.4	177	24	212	1,095	228	36.1	269	51.4	233
55	Census Tract 8014.01	Springfield	76.14	18.0	17	137	613	137	37.6	217	88.7	222	17	188	605	184	37.6	273	88.7	279
56	Census Tract 7312.03	Worcester	76.00	28.0	37	198	931	164	29.0	185	32.9	140	45	265	1,121	230	29.0	236	32.9	190
57	Census Tract 704.02	Boston	75.97	13.0	28	171	2,067	215	41.5	230	29.9	133	42	258	3,152	290	41.5	286	29.9	179
58	Census Tract 702	Boston	75.16	41.0	227	248	6,208	245	35.1	209	3.9	23	177	304	4,844	300	35.1	265	3.9	23
59	Census Tract 1003	Boston	74.81	9.0	32	181	1,303	187	20.0	147	96.0	236	35	242	1,443	249	20.0	189	96.0	293



Rank	Census Tract Name	City	DIA	Student enroll (%)	2000-2004								2005-2009							
					Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
60	Census Tract 7330	Worcester	74.64	5.0	33	184	1,427	194	31.0	195	25.5	116	32	235	1,384	247	31.0	247	25.5	160
61	Census Tract 610	Boston	74.26	7.0	28	173	1,347	189	47.6	240	33.9	144	28	226	1,319	240	47.6	296	33.9	193
62	Census Tract 709	Boston	73.98	13.0	35	186	1,448	196	26.9	175	50.9	176	32	237	1,348	243	26.9	226	50.9	232
63	Census Tract 7324	Worcester	73.85	6.0	19	147	404	118	28.1	182	27.6	124	45	264	964	219	28.1	233	27.6	168
64	Census Tract 907	Boston	73.75	8.0	83	239	2,276	217	16.9	125	15.2	89	63	284	1,718	263	16.9	163	15.2	116
65	Census Tract 7312.04	Worcester	73.75	8.0	10	109	554	132	29.0	186	32.9	141	22	204	1,222	236	29.0	237	32.9	189
66	Census Tract 8023	Springfield	73.73	6.0	24	166	570	133	27.2	180	48.4	173	31	233	729	201	27.2	231	48.4	229
67	Census Tract 1010.01	Boston	73.23	4.0	35	191	802	156	14.3	98	94.9	232	60	279	1,376	245	14.3	127	94.9	289
68	Census Tract 815	Boston	72.92	9.0	17	139	1,420	193	14.4	99	90.6	223	23	209	1,866	269	14.4	128	90.6	280
69	Census Tract 3119	Lowell	72.68	8.0	-	-	-	-	-	-	-	-	13	170	650	191	-	262	-	169
70	Census Tract 921.01	Boston	72.14	8.0	59	223	1,186	179	16.8	123	28.5	127	66	287	1,322	242	16.8	160	28.5	172
71	Census Tract 8009	Springfield	71.95	5.0	6	83	241	82	50.5	243	73.1	203	13	171	496	167	50.5	300	73.1	260
72	Census Tract 912	Boston	71.48	7.0	26	170	1,049	168	20.3	149	47.4	170	31	234	1,286	238	20.3	191	47.4	226
73	Census Tract 1004	Boston	71.39	7.0	42	204	1,102	173	14.9	103	78.2	212	34	240	898	214	14.9	133	78.2	269
74	Census Tract 3883	Lowell	70.73	44.0	-	-	-	-	-	-	-	-	18	195	480	164	-	298	-	202
75	Census Tract 7319	Worcester	70.53	10.0	22	161	594	136	30.3	192	44.1	163	37	245	1,004	221	30.3	244	44.1	218
76	Census Tract 1205	Boston	70.51	12.0	35	192	1,983	209	17.4	129	73.6	205	26	224	1,479	250	17.4	169	73.6	262
77	Census Tract 509.01	Boston	70.45	3.0	38	199	1,343	188	19.8	144	43.2	159	34	239	1,187	233	19.8	186	43.2	214
78	Census Tract 3104	Lowell	70.45	6.0	-	-	-	-	-	-	-	-	14	172	583	180	-	218	-	176
79	Census Tract 3101	Lowell	70.30	20.0	-	-	-	-	-	-	-	-	12	163	405	149	-	256	-	206
80	Census Tract 922	Boston	70.08	7.0	30	178	1,128	174	10.0	66	60.3	190	43	260	1,602	257	10.0	83	60.3	247
81	Census Tract 502	Boston	69.10	5.0	36	193	977	166	20.2	148	54.2	183	40	251	1,098	229	20.2	190	54.2	239
82	Census Tract 1010.02	Boston	68.93	6.0	31	180	806	157	16.1	113	93.8	229	40	252	1,058	225	16.1	148	93.8	286
83	Census Tract 814	Boston	68.78	21.0	21	160	1,145	177	17.5	132	80.8	214	26	222	1,405	248	17.5	172	80.8	271
84	Census Tract 1401.06	Boston	68.38	13.0	10	107	683	148	22.9	164	52.1	179	14	177	1,011	222	22.9	210	52.1	235
85	Census Tract 1011.01	Boston	67.87	8.0	15	131	678	147	20.0	146	98.4	248	25	213	1,152	231	20.0	188	98.4	305
86	Census Tract 7318	Worcester	67.46	7.0	17	142	382	114	39.7	225	38.8	151	41	254	901	216	39.7	281	38.8	203
87	Census Tract 506	Boston	67.46	7.0	18	144	1,051	169	17.1	127	60.8	192	20	201	1,183	232	17.1	167	60.8	249
88	Census Tract 1403	Boston	67.12	9.0	36	195	784	154	11.7	76	65.6	195	42	256	925	217	11.7	97	65.6	252
89	Census Tract 501.01	Boston	66.92	6.0	20	151	582	135	20.8	154	42.4	156	26	221	764	203	20.8	197	42.4	210
90	Census Tract 3111	Lowell	66.82	5.0	-	-	-	-	-	-	-	-	9	137	631	189	-	255	-	196



					2000-2004								2005-2009							
Rank	Census Tract Name	City	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
91	Census Tract 8011.02	Springfield	66.40	8.0	9	103	703	149	29.4	188	42.6	157	6	106	437	157	29.4	240	42.6	212
92	Census Tract 3112	Lowell	66.27	6.0	-	-	-	-	-	-	-	-	14	174	640	190	-	239	-	135
93	Census Tract 1101.03	Boston	64.81	4.0	41	202	866	159	19.7	143	47.3	168	42	259	900	215	19.7	185	47.3	224
94	Census Tract 1202.01	Boston	64.42	10.0	35	189	1,216	182	15.4	107	47.1	167	38	250	1,319	241	15.4	141	47.1	223
95	Census Tract 8021	Springfield	64.18	8.0	11	118	238	80	25.8	170	32.2	139	29	228	618	185	25.8	219	32.2	187
96	Census Tract 507	Boston	63.47	4.0	20	153	643	143	18.2	134	49.7	174	22	208	713	198	18.2	174	49.7	230
97	Census Tract 612	Boston	63.28	6.0	71	233	4,254	239	17.1	126	3.6	18	68	290	4,086	297	17.1	166	3.6	18
98	Census Tract 402	Boston	62.98	5.0	13	126	1,188	180	27.6	181	40.7	154	12	157	1,064	226	27.6	232	40.7	208
99	Census Tract 504	Boston	62.62	6.0	21	157	1,046	167	14.3	97	49.8	175	17	187	827	206	14.3	126	49.8	231
100	Census Tract 7326	Worcester	62.21	7.0	11	120	360	108	16.5	118	18.0	100	22	206	706	197	16.5	155	18.0	132
101	Census Tract 408.01	Boston	61.69	8.0	20	154	728	150	33.3	202	24.0	112	23	211	814	205	33.3	257	24.0	154
102	Census Tract 910.01	Boston	60.32	4.0	28	172	1,271	184	13.9	95	14.5	84	33	238	1,491	251	13.9	122	14.5	111
103	Census Tract 3120	Lowell	60.11	6.0	-	-	-	-	-	-	-	-	6	112	314	137	-	249	-	158
104	Census Tract 511.01	Boston	60.06	6.0	24	163	551	131	15.5	109	25.4	115	38	246	878	212	15.5	143	25.4	159
105	Census Tract 7327	Worcester	60.01	4.0	9	104	316	101	17.5	130	18.9	102	12	155	390	146	17.5	170	18.9	134
106	Census Tract 8017	Springfield	59.30	37.0	14	130	273	94	18.8	137	69.4	199	10	143	188	92	18.8	177	69.4	256
107	Census Tract 6.02	Boston	59.29	21.0	11	115	268	92	43.0	232	29.9	134	20	202	511	168	43.0	288	29.9	180
108	Census Tract 303	Boston	59.26	14.0	30	179	795	155	14.0	96	8.5	51	41	253	1,075	227	14.0	123	8.5	60
109	Census Tract 3124	Lowell	59.15	5.0	-	-	-	-	-	-	-	-	3	59	199	95	-	206	-	199
110	Census Tract 705	Boston	58.45	9.0	53	218	1,147	178	21.9	159	34.0	145	26	218	552	176	21.9	203	34.0	194
111	Census Tract 3118	Lowell	58.05	5.0	-	-	-	-	-	-	-	-	13	166	577	179	-	165	-	143
112	Census Tract 1006.03	Boston	56.99	8.0	22	162	1,366	190	16.1	114	11.1	68	26	219	1,575	253	16.1	149	11.1	87
n/a	Census Tract 7.03‡	Boston	56.69	55.0	8	88	327	103	32.2	197	16.2	91	12	165	533	174	32.2	251	16.2	124
113	Census Tract 810.01	Boston	55.94	30.0	17	143	425	122	33.8	205	37.3	149	18	191	435	156	33.8	260	37.3	200
114	Census Tract 911	Boston	55.85	14.0	25	168	648	144	16.1	115	16.6	93	27	225	705	195	16.1	150	16.6	125
115	Census Tract 1404	Boston	55.69	10.0	18	146	309	97	12.5	84	84.1	218	28	227	481	165	12.5	109	84.1	275
116	Census Tract 1102.01	Boston	55.30	6.0	11	116	742	152	10.6	68	59.4	188	11	149	756	202	10.6	88	59.4	245
117	Census Tract 3103	Lowell	55.04	9.0	-	-	-	-	-	-	-	-	7	123	162	81	-	152	-	140
118	Census Tract 203.03	Boston	54.91	8.0	24	164	916	163	11.1	71	15.1	88	15	182	593	182	11.1	91	15.1	115
119	Census Tract 708	Boston	54.60	17.0	29	175	869	160	18.0	133	34.1	146	17	189	525	172	18.0	173	34.1	195
n/a	Census Tract 7316‡	Worcester	54.57	63.0	16	133	259	87	35.0	208	17.9	99	26	220	425	153	35.0	264	17.9	131



					2000-2004								2005-2009							
Rank	Census Tract Name	City	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
120	Census Tract 1401.07	Boston	54.07	9.0	10	112	633	141	22.9	163	52.1	178	10	144	620	188	22.9	209	52.1	234
121	Census Tract 1009	Boston	53.65	7.0	21	155	656	145	9.8	64	66.6	197	19	199	618	186	9.8	81	66.6	254
122	Census Tract 7322.03	Worcester	53.58	7.0	8	90	367	110	10.5	67	15.9	90	15	179	714	199	10.5	87	15.9	121
123	Census Tract 1104.01	Boston	53.58	4.0	12	121	453	126	19.2	140	55.2	186	14	175	529	173	19.2	180	55.2	242
124	Census Tract 8.02	Boston	53.11	40.0	17	135	235	79	32.8	201	22.0	105	30	231	416	152	32.8	254	22.0	145
125	Census Tract 703	Boston	52.92	8.0	63	227	1,858	205	13.3	90	8.9	61	57	277	1,675	259	13.3	116	8.9	72
126	Census Tract 7305	Worcester	52.64	14.0	5	66	171	61	16.8	124	20.3	103	25	215	854	211	16.8	161	20.3	141
127	Census Tract 510	Boston	52.52	7.0	20	150	626	140	18.6	135	15.0	85	19	200	619	187	18.6	175	15.0	112
128	Census Tract 809	Boston	52.31	45.0	17	138	532	130	38.5	221	23.5	111	17	186	513	169	38.5	277	23.5	152
129	Census Tract 1006.01	Boston	52.30	6.0	17	141	414	119	15.3	106	29.9	131	22	205	514	170	15.3	139	29.9	177
130	Census Tract 8004	Springfield	52.23	6.0	4	47	85	31	15.9	112	38.0	150	12	156	263	132	15.9	147	38.0	201
131	Census Tract 3121	Lowell	52.00	5.0	-	-	-	-	-	-	-	-	3	46	121	64	-	164	-	122
132	Census Tract 8005	Springfield	51.82	5.0	5	74	221	76	12.5	85	53.6	181	9	139	391	147	12.5	110	53.6	237
133	Census Tract 7320.02	Worcester	51.78	9.0	33	182	1,297	186	16.2	116	13.8	78	18	190	700	193	16.2	151	13.8	105
134	Census Tract 7304.02	Worcester	51.38	7.0	4	51	330	104	16.6	119	25.5	117	10	145	842	209	16.6	156	25.5	161
135	Census Tract 1007	Boston	50.13	6.0	51	215	1,444	195	5.7	26	3.8	20	42	255	1,189	234	5.7	32	3.8	20
<i>n/a</i>	<i>Census Tract 104.05z</i>	<i>Boston</i>	<i>49.93</i>	<i>82.0</i>	<i>10</i>	<i>108</i>	<i>267</i>	<i>91</i>	<i>39.1</i>	<i>223</i>	<i>21.6</i>	<i>104</i>	<i>15</i>	<i>180</i>	<i>412</i>	<i>150</i>	<i>39.1</i>	<i>279</i>	<i>21.6</i>	<i>144</i>
136	Census Tract 3102	Lowell	49.92	12.0	-	-	-	-	-	-	-	-	11	147	239	116	-	95	-	98
137	Census Tract 102.03	Boston	49.54	36.0	21	159	529	129	27.0	178	13.9	80	13	169	319	139	27.0	229	13.9	107
138	Census Tract 1103.01	Boston	49.52	5.0	8	92	433	124	11.9	78	43.7	161	15	181	832	207	11.9	101	43.7	216
139	Census Tract 8015.03	Springfield	49.51	8.0	10	110	368	111	13.7	93	33.0	142	7	114	248	123	13.7	120	33.0	191
140	Census Tract 3530	Cambridge	49.07	16.0	-	-	-	-	-	-	-	-	4	81	136	69	-	125	-	153
141	Census Tract 1008	Boston	48.93	5.0	25	169	572	134	8.9	57	23.2	109	22	207	496	166	8.9	72	23.2	150
142	Census Tract 3107	Lowell	48.77	23.0	-	-	-	-	-	-	-	-	8	126	221	108	-	201	-	137
143	Census Tract 8002.01	Springfield	48.54	3.0	8	95	176	63	15.1	104	28.3	126	11	152	240	119	15.1	136	28.3	171
144	Census Tract 1304.06	Boston	48.40	14.0	5	69	142	56	14.5	102	28.7	128	11	150	312	136	14.5	131	28.7	173
145	Census Tract 106	Boston	48.38	9.0	25	167	1,072	171	9.6	61	9.3	63	16	183	674	192	9.6	77	9.3	75
146	Census Tract 8001.02	Springfield	48.35	6.0	3	43	116	48	20.5	152	32.2	138	5	87	167	86	20.5	194	32.2	186
147	Census Tract 3531.01	Cambridge	48.22	32.0	-	-	-	-	-	-	-	-	4	68	152	77	-	213	-	139
148	Census Tract 7311.01	Worcester	48.18	7.0	9	101	315	100	16.4	117	22.9	108	11	148	378	143	16.4	154	22.9	149
149	Census Tract 403	Boston	48.08	3.0	21	158	657	146	10.8	69	13.9	81	29	229	895	213	10.8	89	13.9	108



					2000-2004								2005-2009							
Rank	Census Tract Name	City	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
150	Census Tract 1105.02	Boston	47.96	8.0	13	123	402	117	9.7	63	31.0	136	14	176	447	158	9.7	80	31.0	183
151	Census Tract 3524	Cambridge	47.91	17.0	-	-	-	-	-	-	-	-	6	110	448	159	-	222	-	243
152	Census Tract 8015.02	Springfield	47.81	5.0	6	79	263	89	21.6	157	57.9	187	5	88	209	102	21.6	200	57.9	244
153	Census Tract 505	Boston	47.61	7.0	9	105	635	142	15.4	108	47.3	169	7	118	459	162	15.4	142	47.3	225
154	Census Tract 512	Boston	47.50	5.0	10	111	472	127	14.5	100	29.9	132	9	140	434	154	14.5	129	29.9	178
155	Census Tract 1401.05	Boston	47.39	12.0	9	106	357	107	10.0	65	43.8	162	14	173	524	171	10.0	82	43.8	217
156	Census Tract 608	Boston	47.21	4.0	36	194	1,142	176	13.2	89	1.4	6	32	236	1,040	223	13.2	115	1.4	6
157	Census Tract 8026.01	Springfield	47.20	7.0	5	77	112	45	13.6	92	25.8	118	8	130	166	85	13.6	119	25.8	162
158	Census Tract 811	Boston	46.78	27.0	15	132	452	125	20.4	150	43.5	160	8	133	241	120	20.4	192	43.5	215
159	Census Tract 104.03	Boston	46.72	34.0	11	117	378	113	37.6	216	14.0	82	7	125	259	130	37.6	272	14.0	109
160	Census Tract 7329.01	Worcester	46.51	7.0	5	62	97	37	19.1	139	17.6	98	12	158	252	128	19.1	179	17.6	130
161	Census Tract 8014.02	Springfield	46.27	6.0	3	37	193	68	16.6	120	54.3	184	2	43	165	84	16.6	157	54.3	240
162	Census Tract 404.01	Boston	46.09	8.0	13	124	728	151	16.7	122	1.6	7	15	178	844	210	16.7	159	1.6	7
163	Census Tract 909.01	Boston	45.83	45.0	4	60	181	65	31.7	196	47.5	171	6	105	230	112	31.7	248	47.5	227
164	Census Tract 8001.01	Springfield	45.52	8.0	3	39	111	44	20.5	153	32.2	137	4	78	156	78	20.5	195	32.2	185
165	Census Tract 1204	Boston	45.49	6.0	19	148	396	116	9.6	62	18.8	101	26	223	540	175	9.6	78	18.8	133
166	Census Tract 105	Boston	44.87	39.0	11	119	372	112	26.3	172	17.2	96	6	108	196	94	26.3	223	17.2	128
167	Census Tract 7304.01	Worcester	44.82	9.0	10	114	264	90	12.1	79	28.8	130	11	153	289	133	12.1	103	28.8	175
168	Census Tract 3117	Lowell	44.81	7.0	-	-	-	-	-	-	-	-	5	94	144	73	-	134	-	90
169	Census Tract 7.04	Boston	44.47	30.0	9	100	189	67	32.2	198	16.2	92	12	161	256	129	32.2	250	16.2	123
170	Census Tract 8003	Springfield	44.24	9.0	7	87	228	77	8.8	53	25.3	113	7	117	203	100	8.8	68	25.3	156
171	Census Tract 1201.04	Boston	44.06	4.0	7	84	365	109	13.7	94	27.2	123	7	121	387	144	13.7	121	27.2	167
172	Census Tract 606	Boston	42.93	6.0	13	125	1,129	175	6.9	34	3.9	21	12	159	1,044	224	6.9	46	3.9	21
173	Census Tract 8015.01	Springfield	42.64	6.0	5	78	155	58	15.1	105	48.3	172	4	74	115	59	15.1	137	48.3	228
174	Census Tract 1	Boston	42.20	11.0	6	81	181	66	13.5	91	12.2	73	19	197	555	177	13.5	117	12.2	96
175	Census Tract 3122	Lowell	41.97	9.0	-	-	-	-	-	-	-	-	3	60	102	54	-	153	-	136
176	Census Tract 1402.01	Boston	41.82	6.0	5	75	335	105	8.4	49	22.3	107	7	122	435	155	8.4	63	22.3	147
177	Census Tract 3521.02	Cambridge	41.55	13.0	-	-	-	-	-	-	-	-	5	102	240	118	-	182	-	94
178	Census Tract 707	Boston	41.53	7.0	14	129	747	153	11.6	75	42.8	158	5	89	249	125	11.6	96	42.8	213
179	Census Tract 1401.02	Boston	41.03	9.0	8	89	270	93	7.4	38	34.5	147	13	167	455	161	7.4	50	34.5	197
180	Census Tract 107.02	Boston	40.91	16.0	21	156	826	158	6.8	33	4.6	27	21	203	842	208	6.8	43	4.6	28



					2000-2004								2005-2009							
Rank	Census Tract Name	City	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
181	Census Tract 1402.02	Boston	40.10	7.0	8	97	203	71	9.1	59	31.0	135	10	142	236	114	9.1	74	31.0	182
182	Census Tract 706	Boston	40.08	7.0	20	152	970	165	9.1	60	13.0	76	12	160	597	183	9.1	75	13.0	100
183	Census Tract 1304.04	Boston	39.86	8.0	4	52	198	69	14.5	101	28.7	129	5	97	248	122	14.5	130	28.7	174
184	Census Tract 3113	Lowell	39.83	12.0	-	-	-	-	-	-	-	-	3	61	120	62	-	100	-	101
185	Census Tract 406	Boston	39.41	8.0	17	136	907	162	5.5	24	2.8	13	19	196	1,003	220	5.5	30	2.8	13
186	Census Tract 1207	Boston	38.86	15.0	7	86	420	121	17.2	128	33.4	143	8	134	454	160	17.2	168	33.4	192
187	Census Tract 1104.03	Boston	38.70	6.0	8	94	242	83	7.9	46	35.0	148	7	119	200	97	7.9	59	35.0	198
188	Census Tract 2.02	Boston	38.16	11.0	2	31	69	26	12.2	80	17.2	97	8	132	252	127	12.2	105	17.2	129
189	Census Tract 7331.02	Worcester	38.11	6.0	5	67	311	98	6.1	29	8.5	47	9	141	584	181	6.1	38	8.5	56
n/a	Census Tract 8.03‡	Boston	38.11	92.0	1	16	36	15	26.9	176	13.8	79	8	135	249	126	26.9	227	13.8	106
190	Census Tract 6.01	Boston	37.95	16.0	4	55	136	53	15.9	111	10.8	67	8	129	260	131	15.9	146	10.8	86
191	Census Tract 101.04‡	Boston	37.20	54.0	12	122	251	86	23.1	165	9.1	62	10	146	211	104	23.1	211	9.1	74
192	Census Tract 203.02	Boston	37.16	16.0	5	68	429	123	11.1	73	15.1	87	4	76	360	141	11.1	93	15.1	114
193	Census Tract 7311.02	Worcester	36.29	10.0	5	65	260	88	7.6	40	11.9	72	5	86	239	117	7.6	53	11.9	93
n/a	Census Tract 101.03‡	Boston	36.13	93.0	1	14	26	9	57.1	246	8.8	58	7	115	168	88	57.1	303	8.8	69
n/a	Census Tract 102.04‡	Boston	36.12	74.0	2	32	85	32	47.7	241	9.5	64	5	99	200	98	47.7	297	9.5	76
194	Census Tract 7310.02	Worcester	36.00	8.0	5	73	114	47	12.6	87	16.9	95	7	120	149	75	12.6	112	16.9	127
195	Census Tract 3114	Lowell	35.17	13.0	-	-	-	-	-	-	-	-	5	96	108	57	-	79	-	102
196	Census Tract 604	Boston	34.65	10.0	14	128	319	102	7.6	39	1.9	8	18	192	416	151	7.6	52	1.9	8
197	Census Tract 7.01	Boston	34.32	33.0	4	59	99	39	26.8	174	11.1	69	11	151	248	124	26.8	225	11.1	88
n/a	Census Tract 104.04‡	Boston	34.15	80.0	9	98	137	54	37.6	215	14.0	83	4	72	64	33	37.6	271	14.0	110
199	Census Tract 5.04	Boston	33.73	23.0	4	56	92	34	23.9	168	8.5	49	8	136	183	91	23.9	216	8.5	58
200	Census Tract 7323.01	Worcester	33.27	9.0	6	82	212	75	8.5	50	8.9	60	9	138	315	138	8.5	64	8.9	71
201	Census Tract 3106.02	Lowell	33.22	7.0	-	-	-	-	-	-	-	-	6	111	145	74	-	18	-	44
202	Census Tract 1206	Boston	33.07	12.0	9	99	418	120	17.5	131	26.4	121	5	91	224	110	17.5	171	26.4	165
203	Census Tract 3105	Lowell	32.37	40.0	-	-	-	-	-	-	-	-	3	54	114	58	-	124	-	82
204	Census Tract 7323.02	Worcester	32.16	9.0	5	64	161	59	8.5	51	8.9	59	6	113	215	107	8.5	65	8.9	70
205	Census Tract 107.01	Boston	32.15	25.0	10	113	477	128	6.8	32	4.6	28	12	164	569	178	6.8	42	4.6	29
206	Census Tract 7328.02	Worcester	31.97	6.0	5	63	148	57	8.9	54	8.8	57	5	101	167	87	8.9	69	8.8	68
207	Census Tract 3525	Cambridge	31.93	14.0	-	-	-	-	-	-	-	-	4	79	165	82	-	196	-	219
208	Census Tract 3115	Lowell	31.63	9.0	-	-	-	-	-	-	-	-	5	95	229	111	-	44	-	34



					2000-2004								2005-2009							
Rank	Census Tract Name	City	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
209	Census Tract 8016.05	Springfield	31.58	5.0	2	24	54	19	12.9	88	26.8	122	1	19	30	13	12.9	113	26.8	166
<i>n/a</i>	<i>Census Tract 1034</i>	<i>Boston</i>	<i>31.49</i>	<i>93.0</i>	<i>4</i>	<i>48</i>	<i>108</i>	<i>41</i>	<i>57.4</i>	<i>247</i>	<i>26.1</i>	<i>120</i>	<i>4</i>	<i>64</i>	<i>102</i>	<i>55</i>	<i>57.4</i>	<i>304</i>	<i>26.1</i>	<i>164</i>
211	Census Tract 1105.01	Boston	31.16	3.0	3	34	98	38	10.9	70	12.3	74	5	103	204	101	10.9	90	12.3	97
212	Census Tract 8002.02	Springfield	30.24	1.0	2	26	206	73	6.1	30	25.3	114	1	17	103	56	6.1	39	25.3	157
213	Census Tract 3534	Cambridge	30.16	16.0	-	-	-	-	-	-	-	-	2	35	98	51	-	114	-	211
214	Census Tract 302	Boston	30.02	14.0	4	44	243	84	8.9	56	3.1	16	4	82	297	135	8.9	71	3.1	16
215	Census Tract 605.01	Boston	29.85	5.0	18	145	620	138	7.1	36	0.9	4	11	154	401	148	7.1	48	0.9	4
216	Census Tract 8016.02	Springfield	29.47	8.0	1	12	30	10	12.3	83	27.7	125	2	44	71	37	12.3	108	27.7	170
217	Census Tract 3527	Cambridge	29.29	13.0	-	-	-	-	-	-	-	-	4	67	200	96	-	208	-	181
218	Census Tract 4.01	Boston	28.72	19.0	5	70	93	35	21.7	158	6.5	37	7	116	123	65	21.7	202	6.5	41
219	Census Tract 3549	Cambridge	28.72	9.0	-	-	-	-	-	-	-	-	2	42	60	31	-	86	-	207
220	Census Tract 3123	Lowell	28.13	4.0	-	-	-	-	-	-	-	-	6	109	156	79	-	51	-	51
221	Census Tract 1303	Boston	27.76	7.0	8	96	246	85	3.4	7	4.2	25	12	162	357	140	3.4	7	4.2	25
222	Census Tract 8016.01	Springfield	27.65	25.0	3	38	68	24	7.6	41	25.9	119	2	40	50	22	7.6	54	25.9	163
223	Census Tract 3521.01	Cambridge	27.58	30.0	-	-	-	-	-	-	-	-	0	6	56	27	-	183	-	95
224	Census Tract 3526	Cambridge	27.26	13.0	-	-	-	-	-	-	-	-	3	49	126	67	-	104	-	142
225	Census Tract 1106.07	Boston	26.59	6.0	7	85	162	60	3.2	6	8.7	54	8	128	175	90	3.2	6	8.7	64
226	Census Tract 3535	Cambridge	26.49	15.0	-	-	-	-	-	-	-	-	2	33	92	47	-	138	-	188
227	Census Tract 203.01	Boston	26.35	13.0	3	40	179	64	11.1	72	15.1	86	4	73	238	115	11.1	92	15.1	113
228	Census Tract 2.01	Boston	26.03	16.0	2	19	47	17	8.7	52	9.9	65	8	131	233	113	8.7	67	9.9	78
<i>n/a</i>	<i>Census Tract 3531.024</i>	<i>Cambridge</i>	<i>25.75</i>	<i>92.0</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>3</i>	<i>48</i>	<i>52</i>	<i>23</i>	<i>-</i>	<i>214</i>	<i>-</i>	<i>138</i>
230	Census Tract 104.08	Boston	25.45	26.0	2	22	136	52	26.9	177	13.8	77	3	50	211	105	26.9	228	13.8	104
231	Census Tract 401	Boston	25.26	3.0	6	80	348	106	5.9	28	2.1	9	8	127	467	163	5.9	36	2.1	9
232	Census Tract 4.02	Boston	25.20	25.0	2	23	55	20	20.4	151	7.5	43	4	70	116	60	20.4	193	7.5	50
233	Census Tract 7303	Worcester	24.64	6.0	3	35	74	28	5.3	21	5.7	31	5	92	127	68	5.3	26	5.7	35
<i>n/a</i>	<i>Census Tract 5.024</i>	<i>Boston</i>	<i>24.58</i>	<i>63.0</i>	<i>4</i>	<i>45</i>	<i>118</i>	<i>49</i>	<i>23.6</i>	<i>166</i>	<i>8.4</i>	<i>46</i>	<i>3</i>	<i>53</i>	<i>98</i>	<i>50</i>	<i>23.6</i>	<i>212</i>	<i>8.4</i>	<i>55</i>
235	Census Tract 304	Boston	23.99	13.0	4	57	205	72	11.1	74	2.3	10	5	93	224	109	11.1	94	2.3	10
236	Census Tract 3522	Cambridge	23.89	9.0	-	-	-	-	-	-	-	-	1	14	56	28	-	162	-	118
237	Census Tract 7310.01	Worcester	23.88	10.0	1	10	68	23	12.6	86	16.9	94	5	90	389	145	12.6	111	16.9	126
238	Census Tract 3542	Cambridge	23.61	6.0	-	-	-	-	-	-	-	-	18	194	701	194	-	10	-	31
239	Census Tract 3532	Cambridge	22.71	37.0	-	-	-	-	-	-	-	-	3	47	100	52	-	132	-	148



					2000-2004								2005-2009							
Rank	Census Tract Name	City	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
240	Census Tract 3546	Cambridge	22.03	9.0	-	-	-	-	-	-	-	-	2	36	57	29	-	99	-	184
241	Census Tract 8016.03	Springfield	21.99	5.0	1	7	19	5	4.2	13	23.4	110	1	22	44	19	4.2	15	23.4	151
242	Census Tract 1304.02	Boston	21.84	3.0	5	61	121	51	3.4	8	3.9	22	7	124	189	93	3.4	8	3.9	22
243	Census Tract 3533	Cambridge	21.84	15.0	-	-	-	-	-	-	-	-	4	80	143	71	-	84	-	120
244	Census Tract 7328.01	Worcester	21.80	10.0	4	54	120	50	8.9	55	8.8	56	4	84	126	66	8.9	70	8.8	67
245	Census Tract 8026.02	Springfield	21.69	4.0	5	72	307	96	8.0	47	4.1	24	3	51	165	83	8.0	60	4.1	24
246	Census Tract 3116	Lowell	21.60	7.0	-	-	-	-	-	-	-	-	1	12	20	9	-	118	-	79
247	Census Tract 3125.01	Lowell	21.46	4.0	-	-	-	-	-	-	-	-	2	26	45	20	-	45	-	66
248	Census Tract 7322.02	Worcester	21.16	6.0	3	42	140	55	5.8	27	7.9	44	3	62	149	76	5.8	33	7.9	52
249	Census Tract 7331.01	Worcester	21.01	8.0	1	8	53	18	7.7	44	7.3	41	3	56	212	106	7.7	57	7.3	48
250	Census Tract 3539	Cambridge	21.01	75.0	-	-	-	-	-	-	-	-	1	18	18	7	-	220	-	119
251	Census Tract 3106.01	Lowell	20.52	8.0	-	-	-	-	-	-	-	-	4	75	100	53	-	34	-	77
252	Census Tract 1201.03	Boston	20.50	9.0	3	36	230	78	5.2	19	8.6	53	4	83	361	142	5.2	24	8.6	62
n/a	Census Tract 3537.4	Cambridge	20.42	62.0	-	-	-	-	-	-	-	-	2	30	34	15	-	145	-	84
254	Census Tract 3.01	Boston	20.35	10.0	2	30	78	29	9.0	58	8.2	45	5	100	202	99	9.0	73	8.2	54
255	Census Tract 3528	Cambridge	20.31	17.0	-	-	-	-	-	-	-	-	2	41	118	61	-	85	-	155
256	Census Tract 603.01	Boston	20.14	6.0	8	91	284	95	7.1	37	0.8	2	6	107	209	103	7.1	49	0.8	2
257	Census Tract 202	Boston	20.11	15.0	4	46	110	43	11.7	77	7.4	42	3	55	87	45	11.7	98	7.4	49
258	Census Tract 602	Boston	20.00	5.0	5	76	312	99	6.7	31	0.5	1	5	98	289	134	6.7	41	0.5	1
259	Census Tract 7308.02	Worcester	19.87	11.0	1	17	89	33	5.3	22	5.8	35	4	71	242	121	5.3	28	5.8	39
260	Census Tract 3523	Cambridge	19.69	16.0	-	-	-	-	-	-	-	-	1	21	70	35	-	135	-	103
261	Census Tract 8024	Springfield	19.66	7.0	2	20	55	21	3.9	11	8.5	48	2	45	83	44	3.9	13	8.5	57
262	Census Tract 7322.01	Worcester	19.59	12.0	1	6	25	8	12.3	82	8.7	55	1	23	58	30	12.3	107	8.7	65
263	Census Tract 301	Boston	18.86	13.0	4	50	201	70	7.8	45	1.3	5	1	25	74	39	7.8	58	1.3	5
264	Census Tract 3538	Cambridge	18.60	20.0	-	-	-	-	-	-	-	-	0	8	8	5	-	140	-	63
265	Census Tract 3540	Cambridge	18.58	45.0	-	-	-	-	-	-	-	-	1	15	24	10	-	61	-	73
266	Census Tract 7329.02	Worcester	18.57	98.0	0	1	9	2	18.8	136	4.6	26	0	4	0	1	18.8	176	4.6	27
267	Census Tract 3543	Cambridge	18.49	6.0	-	-	-	-	-	-	-	-	1	16	38	17	-	40	-	117
268	Census Tract 601.01	Boston	18.08	8.0	4	58	171	62	4.2	14	0.9	3	4	85	171	89	4.2	16	0.9	3
269	Census Tract 201.01	Boston	17.44	5.0	8	93	211	74	4.2	12	2.7	12	5	104	143	72	4.2	14	2.7	12
270	Census Tract 7301	Worcester	17.09	9.0	2	21	42	16	3.7	9	6.7	38	4	63	95	48	3.7	9	6.7	42



Rank	Census Tract Name	City	DIA	Student enroll (%)	2000-2004								2005-2009							
					Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
271	Census Tract 5.03	Boston	16.91	30.0	0	2	8	1	23.9	167	8.5	50	1	10	24	11	23.9	215	8.5	59
272	Census Tract 3.02	Boston	16.90	14.0	2	25	68	25	5.6	25	4.8	30	2	37	76	41	5.6	31	4.8	32
273	Census Tract 305	Boston	16.45	13.0	5	71	238	81	5.2	20	2.7	11	3	52	137	70	5.2	25	2.7	11
274	Census Tract 8025	Springfield	16.31	7.0	2	18	30	11	5.5	23	10.6	66	2	38	38	18	5.5	29	10.6	83
275	Census Tract 7302	Worcester	15.26	6.0	4	53	95	36	7.0	35	11.2	71	4	69	90	46	7.0	47	11.2	91
276	Census Tract 3550	Cambridge	15.15	7.0	-	-	-	-	-	-	-	-	0	3	0	2	-	37	-	80
277	Census Tract 3547	Cambridge	14.36	13.0	-	-	-	-	-	-	-	-	3	58	158	80	-	20	-	81
278	Census Tract 1302	Boston	13.79	6.0	4	49	101	40	3.0	5	3.1	17	4	65	96	49	3.0	5	3.1	17
279	Census Tract 7309.02	Worcester	13.55	37.0	0	5	19	6	8.3	48	6.0	36	2	27	76	42	8.3	62	6.0	40
280	Census Tract 7307	Worcester	13.12	10.0	1	15	24	7	2.2	2	6.8	39	4	66	73	38	2.2	2	6.8	43
281	Census Tract 3541	Cambridge	12.74	23.0	-	-	-	-	-	-	-	-	2	31	62	32	-	66	-	45
282	Census Tract 1301	Boston	12.74	6.0	3	41	70	27	4.8	16	4.6	29	3	57	74	40	4.8	19	4.6	30
<i>n/a</i>	<i>Census Tract 7312.02‡</i>	<i>Worcester</i>	<i>12.49</i>	<i>100.0</i>	<i>1</i>	<i>9</i>	<i>81</i>	<i>30</i>	<i>0.0</i>	<i>1</i>	<i>7.3</i>	<i>40</i>	<i>1</i>	<i>13</i>	<i>81</i>	<i>43</i>	<i>0.0</i>	<i>1</i>	<i>7.3</i>	<i>47</i>
284	Census Tract 3545	Cambridge	12.31	13.0	-	-	-	-	-	-	-	-	1	11	32	14	-	76	-	33
285	Census Tract 1201.05	Boston	12.08	17.0	2	28	109	42	5.2	18	8.5	52	2	39	120	63	5.2	23	8.5	61
286	Census Tract 3125.02	Lowell	12.00	5.0	-	-	-	-	-	-	-	-	1	20	35	16	-	21	-	26
287	Census Tract 108.01	Boston	11.68	15.0	1	11	33	13	7.7	42	5.8	34	2	28	53	24	7.7	55	5.8	38
288	Census Tract 8016.04	Springfield	11.66	6.0	0	4	13	4	5.1	17	12.7	75	1	24	45	21	5.1	22	12.7	99
289	Census Tract 3536	Cambridge	11.65	47.0	-	-	-	-	-	-	-	-	0	2	0	4	-	102	-	85
290	Census Tract 108.02	Boston	11.12	16.0	2	27	67	22	7.7	43	5.8	33	2	29	54	25	7.7	56	5.8	37
291	Census Tract 7306	Worcester	11.00	26.0	2	29	31	12	2.8	4	3.0	14	4	77	65	34	2.8	4	3.0	14
292	Census Tract 7309.01	Worcester	10.85	12.0	0	3	12	3	3.8	10	5.7	32	2	32	55	26	3.8	12	5.7	36
293	Census Tract 7308.01	Worcester	8.87	7.0	1	13	35	14	4.2	15	3.0	15	2	34	70	36	4.2	17	3.0	15
294	Census Tract 3529	Cambridge	8.44	8.0	-	-	-	-	-	-	-	-	0	5	14	6	-	35	-	46
295	Census Tract 1106.01	Boston	8.37	4.0	2	33	113	46	2.4	3	3.7	19	1	9	28	12	2.4	3	3.7	19
296	Census Tract 3544	Cambridge	7.45	10.0	-	-	-	-	-	-	-	-	0	1	0	3	-	11	-	92
297	Census Tract 3548	Cambridge	5.77	10.0	-	-	-	-	-	-	-	-	0	7	19	8	-	27	-	53

Note: 15 census tracts grayed out and italicized had more than 50% of residents in undergraduate or graduate degree programs (‡), "-" indicates tract did not have data in that time period.



Rank	Census Tract Name	City	DIA	Student enroll (%)	2010-2014								2015-2017							
					Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
1	Census Tract 8020	Springfield	94.81	5.0	54	296	2,766	298	54.1	296	82.0	271	47	288	1,929	292	56.3	298	85.2	278
2	Census Tract 804.01	Boston	94.15	6.0	64	300	3,123	301	36.6	254	88.3	282	44	287	1,945	293	37.8	263	87.0	281
3	Census Tract 8012	Springfield	93.05	2.0	35	274	1,827	291	58.4	300	85.4	278	63	298	3,499	299	62.9	304	85.3	279
4	Census Tract 8006	Springfield	92.53	4.0	22	233	1,167	269	66.5	305	95.7	299	34	277	1,953	294	60.7	302	97.3	304
5	Census Tract 805	Boston	92.38	14.0	45	285	2,089	296	39.6	266	92.4	292	24	257	1,046	275	42.4	281	82.1	272
6	Census Tract 7314	Worcester	91.80	7.0	100	303	2,963	300	49.1	287	64.6	241	104	302	3,214	298	41.1	275	57.7	218
7	Census Tract 902	Boston	91.09	2.0	31	269	1,839	292	31.6	227	83.9	275	22	252	1,232	283	35.9	253	91.3	289
8	Census Tract 801	Boston	90.99	6.0	94	302	3,813	303	38.3	260	70.1	248	123	304	5,399	305	24.8	201	77.3	263
9	Census Tract 7313	Worcester	90.63	11.0	48	289	1,714	290	40.8	268	61.0	233	49	290	1,767	291	41.9	277	62.5	233
10	Census Tract 924	Boston	90.18	8.0	49	291	1,201	271	28.6	209	96.5	300	27	262	635	241	42.3	280	96.8	303
11	Census Tract 813	Boston	89.91	16.0	55	298	1,255	276	38.4	261	82.2	272	53	293	1,159	280	45.1	288	83.8	274
12	Census Tract 803	Boston	89.80	8.0	35	275	2,234	297	33.7	241	87.8	280	24	255	1,391	288	20.6	164	88.0	285
13	Census Tract 7317	Worcester	89.60	15.0	101	304	5,177	305	46.2	283	45.0	200	120	303	4,953	303	44.1	283	41.9	183
14	Census Tract 812	Boston	89.50	12.0	30	268	1,253	275	42.7	271	82.9	273	29	267	1,162	281	36.7	257	70.0	246
15	Census Tract 903	Boston	88.90	6.0	24	248	946	255	36.9	256	89.1	284	20	247	934	266	37.0	259	95.3	300
16	Census Tract 8011.01	Springfield	88.62	5.0	23	247	1,443	282	63.9	303	81.6	269	63	297	4,147	302	64.5	305	86.3	280
17	Census Tract 8018	Springfield	87.99	14.0	29	264	991	261	54.3	297	84.5	277	39	284	1,357	287	39.7	268	84.8	275
18	Census Tract 817	Boston	87.71	14.0	49	290	2,002	295	41.8	270	89.8	286	18	237	594	236	29.4	234	79.7	266
19	Census Tract 1001	Boston	87.63	7.0	44	284	1,021	263	33.7	240	91.1	290	32	272	672	246	30.3	239	94.4	296
20	Census Tract 818	Boston	87.34	7.0	35	276	1,572	287	37.6	258	95.4	298	16	222	656	244	24.8	200	92.6	290
21	Census Tract 8019.01	Springfield	87.30	9.0	37	277	1,362	280	43.3	277	83.1	274	53	294	2,010	295	45.8	290	79.1	265
22	Census Tract 901	Boston	87.24	8.0	46	287	1,226	273	30.2	217	89.9	288	30	269	825	262	33.8	250	94.7	298
23	Census Tract 7315	Worcester	86.50	5.0	51	294	1,479	283	42.9	274	68.4	247	62	296	1,664	289	40.9	274	58.8	222
n/a	Census Tract 806.01‡	Boston	86.49	64.0	41	281	1,108	267	48.4	286	41.3	188	29	268	762	255	45.0	286	42.7	187
24	Census Tract 821	Boston	84.99	7.0	30	266	883	251	45.6	281	95.2	297	17	224	426	202	40.0	270	87.9	284
25	Census Tract 8019.02	Springfield	84.88	4.0	25	253	1,080	265	60.1	301	77.3	265	102	301	4,064	301	54.7	296	74.2	256
26	Census Tract 904	Boston	84.61	6.0	29	265	1,213	272	31.7	229	87.8	281	16	215	491	216	25.9	207	90.5	288
27	Census Tract 8008	Springfield	84.37	9.0	17	201	1,151	268	50.5	289	89.8	287	54	295	3,910	300	55.9	297	87.4	283
28	Census Tract 7325	Worcester	83.82	11.0	39	279	2,896	299	32.2	231	49.0	206	34	278	2,329	296	39.6	266	51.4	208
29	Census Tract 1011.02	Boston	83.68	7.0	29	262	788	235	33.6	239	93.4	295	20	246	556	230	26.7	214	93.3	291
30	Census Tract 611.01	Boston	82.81	6.0	28	259	1,885	293	60.7	302	65.0	242	17	229	1,178	282	60.5	301	63.6	235



					2010-2014								2015-2017							
Rank	Census Tract Name	City	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
31	Census Tract 920	Boston	82.78	9.0	32	271	797	239	27.9	207	80.1	268	42	286	1,060	276	28.8	232	80.4	267
32	Census Tract 913	Boston	82.37	13.0	29	263	1,484	284	23.5	183	63.0	235	19	242	946	268	21.8	179	76.2	261
33	Census Tract 923	Boston	82.14	5.0	22	237	896	252	25.8	194	93.0	294	21	249	783	257	20.9	168	94.1	295
34	Census Tract 503	Boston	82.07	10.0	22	234	1,247	274	39.5	264	58.0	226	18	235	968	272	37.2	261	57.6	217
35	Census Tract 1002	Boston	81.81	8.0	20	226	949	256	23.0	178	91.0	289	16	216	726	252	26.4	212	89.6	287
36	Census Tract 711.01	Boston	80.86	14.0	60	299	1,642	288	33.2	234	34.2	167	67	299	1,746	290	29.9	236	22.4	127
37	Census Tract 607	Boston	80.50	8.0	19	222	1,276	277	39.9	267	64.3	240	10	177	561	232	49.1	294	72.2	251
38	Census Tract 712.01	Boston	80.47	6.0	51	293	1,953	294	33.5	236	44.8	198	9	171	322	175	32.1	246	43.8	192
39	Census Tract 820	Boston	80.45	2.0	22	232	963	258	36.1	249	98.0	304	8	156	365	186	27.9	224	95.1	299
40	Census Tract 914	Boston	79.71	7.0	21	228	1,052	264	30.8	221	76.9	264	10	180	434	204	23.8	192	83.7	273
41	Census Tract 1005	Boston	79.67	7.0	38	278	809	242	31.2	224	76.4	263	28	265	493	219	30.9	241	73.7	255
42	Census Tract 916	Boston	79.65	7.0	33	273	1,298	278	25.4	192	63.3	237	32	270	1,336	286	24.4	196	59.6	224
43	Census Tract 819	Boston	79.58	7.0	21	231	877	250	36.7	255	99.0	305	16	221	630	239	41.9	278	96.3	301
44	Census Tract 8007	Springfield	78.75	6.0	18	213	630	219	50.5	290	96.5	301	78	300	2,605	297	44.5	284	97.8	305
45	Census Tract 906	Boston	78.34	8.0	23	242	1,437	281	25.1	188	75.4	258	12	203	658	245	23.6	191	81.0	268
46	Census Tract 701.01	Boston	77.84	29.0	214	305	4,184	304	22.0	169	8.9	42	319	305	5,353	304	21.1	169	11.4	50
47	Census Tract 8013	Springfield	77.77	8.0	17	204	505	192	39.3	262	81.9	270	33	276	889	265	40.1	271	81.4	269
48	Census Tract 919	Boston	77.60	5.0	19	214	607	213	18.9	142	89.4	285	18	232	585	233	19.7	151	94.4	297
49	Census Tract 1203.01	Boston	77.09	12.0	43	282	980	260	15.0	110	46.4	203	47	289	1,037	274	15.8	123	49.4	205
50	Census Tract 918	Boston	76.90	7.0	16	200	576	206	36.5	253	75.1	257	15	211	526	224	26.1	209	74.9	259
51	Census Tract 915	Boston	76.54	5.0	22	239	618	215	22.9	177	49.1	207	32	271	787	258	20.1	158	66.4	242
52	Census Tract 7320.01	Worcester	76.39	7.0	10	159	519	197	57.2	298	78.2	267	3	79	122	102	58.3	299	82.0	270
53	Census Tract 917	Boston	76.39	8.0	21	230	823	244	26.1	195	74.2	256	16	219	681	247	21.6	178	74.4	257
n/a	Census Tract 808.01‡	Boston	76.32	52.0	26	254	795	238	44.2	279	58.9	228	10	183	263	161	40.0	269	57.8	219
54	Census Tract 8022	Springfield	76.23	4.0	18	210	771	229	45.8	282	74.1	255	23	253	961	270	36.8	258	74.7	258
55	Census Tract 8014.01	Springfield	76.14	18.0	18	211	632	221	39.6	265	86.1	279	19	241	752	254	43.1	282	84.9	276
56	Census Tract 7312.03	Worcester	76.00	28.0	39	280	774	230	49.4	288	44.7	197	39	285	743	253	36.6	254	41.1	181
57	Census Tract 704.02	Boston	75.97	13.0	48	288	3,419	302	53.8	295	12.0	66	7	146	371	188	39.6	265	20.8	120
58	Census Tract 702	Boston	75.16	41.0	77	301	1,486	285	36.3	252	5.2	22	49	291	973	273	27.4	219	5.1	13
59	Census Tract 1003	Boston	74.81	9.0	16	198	643	223	18.9	143	93.8	296	14	209	443	208	24.8	202	93.4	292
60	Census Tract 7330	Worcester	74.64	5.0	27	257	936	253	25.2	189	41.0	187	25	260	865	263	28.0	226	44.0	193



					2010-2014								2015-2017							
Rank	Census Tract Name	City	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
61	Census Tract 610	Boston	74.26	7.0	19	217	795	237	44.1	278	40.1	185	10	178	415	199	36.6	255	55.4	214
62	Census Tract 709	Boston	73.98	13.0	21	229	793	236	20.8	160	39.3	182	32	273	1,319	285	17.6	137	40.7	180
63	Census Tract 7324	Worcester	73.85	6.0	44	283	1,002	262	41.8	269	51.4	210	38	283	818	261	30.2	238	64.4	236
64	Census Tract 907	Boston	73.75	8.0	45	286	1,196	270	26.9	201	25.6	140	35	280	963	271	25.7	205	25.4	138
65	Census Tract 7312.04	Worcester	73.75	8.0	25	250	1,513	286	34.9	244	56.6	224	18	234	1,066	277	39.0	264	49.4	204
66	Census Tract 8023	Springfield	73.73	6.0	23	244	496	190	36.2	250	61.4	234	38	282	814	259	45.0	287	73.5	254
67	Census Tract 1010.01	Boston	73.23	4.0	28	258	581	209	20.8	162	96.7	302	18	236	386	191	27.2	218	93.9	294
68	Census Tract 815	Boston	72.92	9.0	13	177	717	226	33.5	237	84.2	276	9	163	492	217	32.7	248	85.1	277
69	Census Tract 3119	Lowell	72.68	8.0	15	189	853	246	42.7	272	34.3	168	16	218	815	260	48.3	293	43.5	190
70	Census Tract 921.01	Boston	72.14	8.0	52	295	967	259	23.3	181	30.6	153	52	292	875	264	20.5	163	32.7	158
71	Census Tract 8009	Springfield	71.95	5.0	17	205	575	205	58.2	299	91.9	291	19	240	637	242	39.7	267	88.9	286
72	Census Tract 912	Boston	71.48	7.0	22	236	873	249	25.5	193	45.5	202	17	225	703	250	22.3	182	46.1	195
73	Census Tract 1004	Boston	71.39	7.0	32	270	812	243	19.4	148	75.7	260	18	231	402	196	22.3	183	77.4	264
74	Census Tract 3883	Lowell	70.73	44.0	23	246	459	188	52.0	292	38.4	180	21	250	401	195	61.5	303	39.4	176
75	Census Tract 7319	Worcester	70.53	10.0	23	245	632	222	30.7	219	48.7	205	17	226	456	213	29.1	233	47.3	198
76	Census Tract 1205	Boston	70.51	12.0	15	192	783	234	21.9	166	51.8	212	10	174	435	205	20.6	165	54.0	212
77	Census Tract 509.01	Boston	70.45	3.0	20	227	500	191	21.5	163	72.9	253	20	244	556	229	19.7	152	70.1	247
78	Census Tract 3104	Lowell	70.45	6.0	19	220	761	227	32.8	233	36.6	176	28	264	1,104	278	28.0	227	36.1	167
79	Census Tract 3101	Lowell	70.30	20.0	33	272	778	232	29.4	214	33.6	166	35	281	707	251	30.6	240	31.2	154
80	Census Tract 922	Boston	70.08	7.0	28	260	1,087	266	11.4	85	56.5	223	33	274	1,252	284	9.9	70	51.9	209
81	Census Tract 502	Boston	69.10	5.0	23	243	520	198	12.7	96	71.3	250	21	251	441	207	17.0	134	73.2	253
82	Census Tract 1010.02	Boston	68.93	6.0	15	191	411	177	22.9	176	92.9	293	17	228	377	190	17.6	138	93.7	293
83	Census Tract 814	Boston	68.78	21.0	14	185	574	203	28.3	208	58.4	227	8	160	332	177	27.5	223	59.9	227
84	Census Tract 1401.06	Boston	68.38	13.0	18	212	1,342	279	27.1	202	75.7	259	7	139	413	198	20.5	162	82.1	271
85	Census Tract 1011.01	Boston	67.87	8.0	14	182	442	185	16.1	123	96.9	303	11	191	369	187	16.9	132	96.5	302
86	Census Tract 7318	Worcester	67.46	7.0	19	218	389	174	32.8	232	44.0	195	17	227	312	173	37.4	262	53.5	211
87	Census Tract 506	Boston	67.46	7.0	16	194	839	245	15.7	118	78.0	266	11	188	540	225	13.5	103	72.6	252
88	Census Tract 1403	Boston	67.12	9.0	25	252	512	194	15.7	117	75.9	261	25	258	450	212	20.0	155	76.1	260
89	Census Tract 501.01	Boston	66.92	6.0	22	238	527	199	23.0	179	65.6	244	18	230	434	203	28.1	228	64.5	237
90	Census Tract 3111	Lowell	66.82	5.0	11	166	574	204	31.7	228	34.4	170	19	239	950	269	24.7	199	27.8	143
91	Census Tract 8011.02	Springfield	66.40	8.0	9	146	803	241	37.0	257	54.8	219	12	201	1,108	279	22.0	181	60.5	228



					2010-2014								2015-2017							
Rank	Census Tract Name	City	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
92	Census Tract 3112	Lowell	66.27	6.0	19	215	778	231	27.2	203	33.1	165	16	220	692	249	24.0	193	29.5	148
93	Census Tract 1101.03	Boston	64.81	4.0	27	256	542	200	19.2	147	41.7	190	16	217	316	174	14.0	110	40.5	178
94	Census Tract 1202.01	Boston	64.42	10.0	18	208	508	193	24.7	187	41.9	192	11	193	340	183	14.8	115	41.5	182
95	Census Tract 8021	Springfield	64.18	8.0	20	224	441	184	24.3	184	53.9	217	34	279	765	256	25.9	208	49.4	206
96	Census Tract 507	Boston	63.47	4.0	15	188	386	173	24.7	186	72.3	252	11	196	272	164	26.2	210	71.3	250
97	Census Tract 612	Boston	63.28	6.0	55	297	1,652	289	9.5	63	7.3	34	24	256	588	234	7.5	47	4.9	10
98	Census Tract 402	Boston	62.98	5.0	8	139	611	214	33.6	238	44.2	196	4	94	274	166	24.3	195	37.7	173
99	Census Tract 504	Boston	62.62	6.0	20	225	944	254	9.9	72	60.8	232	11	190	494	220	8.4	55	57.5	215
100	Census Tract 7326	Worcester	62.21	7.0	29	261	860	247	28.9	211	49.1	208	19	238	620	237	19.7	153	46.4	196
101	Census Tract 408.01	Boston	61.69	8.0	16	195	464	189	33.4	235	35.2	174	7	137	184	129	32.5	247	39.1	174
102	Census Tract 910.01	Boston	60.32	4.0	22	240	872	248	9.9	74	15.0	85	23	254	934	267	10.4	74	14.8	76
103	Census Tract 3120	Lowell	60.11	6.0	13	178	626	217	29.0	212	31.4	155	9	166	446	210	25.7	206	42.7	186
104	Census Tract 511.01	Boston	60.06	6.0	30	267	579	208	22.4	174	42.8	193	12	204	203	138	21.1	170	48.9	203
105	Census Tract 7327	Worcester	60.01	4.0	17	202	590	211	36.3	251	45.1	201	20	245	683	248	30.0	237	48.2	202
106	Census Tract 8017	Springfield	59.30	37.0	13	175	204	121	36.0	248	67.2	245	27	263	422	201	31.8	245	68.3	243
107	Census Tract 6.02	Boston	59.29	21.0	12	170	389	175	31.5	225	24.6	135	10	185	308	170	34.4	251	29.2	147
108	Census Tract 303	Boston	59.26	14.0	50	292	959	257	17.9	134	12.9	73	33	275	634	240	16.9	131	11.6	53
109	Census Tract 3124	Lowell	59.15	5.0	11	165	618	216	26.8	200	53.3	216	10	175	542	226	26.8	215	47.2	197
110	Census Tract 705	Boston	58.45	9.0	22	235	424	178	14.7	107	18.0	112	9	165	185	130	21.2	172	22.3	125
111	Census Tract 3118	Lowell	58.05	5.0	15	190	596	212	20.0	154	17.3	106	13	207	505	221	22.0	180	21.5	121
112	Census Tract 1006.03	Boston	56.99	8.0	14	181	783	233	7.9	42	18.9	118	11	198	640	243	6.9	42	18.4	103
n/a	Census Tract 7.03‡	Boston	56.69	55.0	10	156	454	187	53.7	294	16.6	98	8	161	437	206	40.6	272	17.5	96
113	Census Tract 810.01	Boston	55.94	30.0	7	129	179	107	43.0	276	32.7	163	5	115	110	94	45.8	289	39.1	175
114	Census Tract 911	Boston	55.85	14.0	23	241	571	202	21.6	164	11.3	60	20	243	468	214	15.0	116	11.7	54
115	Census Tract 1404	Boston	55.69	10.0	19	223	293	149	11.3	83	88.8	283	10	179	145	115	13.0	98	87.4	282
116	Census Tract 1102.01	Boston	55.30	6.0	9	150	515	196	14.7	106	71.8	251	4	105	213	143	14.7	114	76.6	262
117	Census Tract 3103	Lowell	55.04	9.0	13	174	278	146	20.7	157	32.3	158	25	259	548	227	36.6	256	43.7	191
118	Census Tract 203.03	Boston	54.91	8.0	24	249	799	240	18.5	137	23.0	127	11	186	309	172	19.6	150	24.9	136
119	Census Tract 708	Boston	54.60	17.0	8	142	241	135	20.1	155	21.9	125	10	176	297	167	18.5	145	26.9	142
n/a	Census Tract 7316‡	Worcester	54.57	63.0	17	206	281	147	42.9	275	13.9	79	11	187	166	124	42.2	279	17.2	94
120	Census Tract 1401.07	Boston	54.07	9.0	10	153	440	183	9.5	62	67.8	246	3	92	152	119	9.3	65	58.0	220



					2010-2014								2015-2017							
Rank	Census Tract Name	City	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
121	Census Tract 1009	Boston	53.65	7.0	9	151	273	142	14.4	105	63.6	238	7	140	205	140	11.2	82	60.6	229
122	Census Tract 7322.03	Worcester	53.58	7.0	14	186	650	224	20.8	161	26.8	144	12	202	407	197	24.4	197	41.9	184
123	Census Tract 1104.01	Boston	53.58	4.0	7	130	227	129	11.3	81	65.1	243	7	138	218	147	14.4	111	58.3	221
124	Census Tract 8.02	Boston	53.11	40.0	17	203	254	137	34.0	242	28.2	148	7	145	113	96	31.7	243	23.1	131
125	Census Tract 703	Boston	52.92	8.0	15	187	369	171	12.4	95	9.5	47	14	210	335	179	6.1	30	5.9	19
126	Census Tract 7305	Worcester	52.64	14.0	16	197	578	207	28.8	210	31.8	157	5	128	192	133	28.6	230	35.8	166
127	Census Tract 510	Boston	52.52	7.0	16	199	439	182	15.1	112	45.0	199	5	113	132	110	20.0	157	43.4	189
128	Census Tract 809	Boston	52.31	45.0	10	152	272	141	37.9	259	13.8	77	3	88	93	79	40.9	273	12.8	62
129	Census Tract 1006.01	Boston	52.30	6.0	14	184	316	157	15.6	116	32.8	164	11	189	218	146	15.7	122	47.8	200
130	Census Tract 8004	Springfield	52.23	6.0	12	171	274	143	25.2	190	63.2	236	18	233	395	193	28.7	231	62.9	234
131	Census Tract 3121	Lowell	52.00	5.0	11	163	512	195	22.0	168	32.5	160	11	194	506	222	31.7	244	31.3	156
132	Census Tract 8005	Springfield	51.82	5.0	8	135	311	153	24.3	185	70.5	249	6	131	228	153	27.5	222	71.1	249
133	Census Tract 7320.02	Worcester	51.78	9.0	9	149	226	128	13.0	97	24.7	137	16	214	421	200	7.6	49	20.4	116
134	Census Tract 7304.02	Worcester	51.38	7.0	7	126	586	210	7.3	37	38.2	179	8	162	555	228	13.6	104	36.2	169
135	Census Tract 1007	Boston	50.13	6.0	25	251	713	225	4.3	9	4.2	14	20	248	590	235	6.4	34	5.5	16
<i>n/a</i>	<i>Census Tract 104.05z</i>	<i>Boston</i>	<i>49.93</i>	<i>82.0</i>	<i>5</i>	<i>108</i>	<i>91</i>	<i>65</i>	<i>50.8</i>	<i>291</i>	<i>16.4</i>	<i>95</i>	<i>8</i>	<i>155</i>	<i>129</i>	<i>107</i>	<i>44.9</i>	<i>285</i>	<i>20.3</i>	<i>115</i>
136	Census Tract 3102	Lowell	49.92	12.0	19	221	363	169	7.0	33	24.3	132	28	266	558	231	13.0	97	33.8	163
137	Census Tract 102.03	Boston	49.54	36.0	5	107	113	83	44.9	280	17.4	107	7	142	146	116	49.6	295	16.7	90
138	Census Tract 1103.01	Boston	49.52	5.0	9	147	438	181	6.1	28	56.5	222	4	102	186	131	9.5	66	57.5	216
139	Census Tract 8015.03	Springfield	49.51	8.0	6	110	188	111	20.8	159	55.6	221	11	192	336	181	20.0	156	64.8	238
140	Census Tract 3530	Cambridge	49.07	16.0	14	183	435	180	21.9	167	18.7	117	17	223	515	223	17.1	135	20.4	117
141	Census Tract 1008	Boston	48.93	5.0	18	209	343	165	6.6	31	29.8	152	15	212	262	160	10.2	72	35.4	165
142	Census Tract 3107	Lowell	48.77	23.0	12	172	327	160	21.6	165	26.5	142	8	158	211	141	23.1	188	22.1	124
143	Census Tract 8002.01	Springfield	48.54	3.0	12	173	244	136	19.5	150	50.3	209	11	197	205	139	26.3	211	59.7	226
144	Census Tract 1304.06	Boston	48.40	14.0	13	176	343	166	15.5	115	60.6	230	9	168	221	151	21.2	174	61.4	230
145	Census Tract 106	Boston	48.38	9.0	10	158	381	172	15.1	111	10.7	56	13	208	450	211	12.8	96	13.4	68
146	Census Tract 8001.02	Springfield	48.35	6.0	7	128	237	134	34.9	246	60.8	231	8	153	258	159	25.3	204	66.4	241
147	Census Tract 3531.01	Cambridge	48.22	32.0	6	114	265	139	26.2	196	21.1	124	12	199	492	218	17.8	140	28.1	145
148	Census Tract 7311.01	Worcester	48.18	7.0	8	136	278	144	26.3	197	35.5	175	5	122	165	123	29.8	235	34.2	164
149	Census Tract 403	Boston	48.08	3.0	11	164	325	159	16.1	124	10.2	54	10	181	308	171	18.0	142	7.3	27
150	Census Tract 1105.02	Boston	47.96	8.0	14	180	398	176	5.4	23	34.8	173	13	206	342	184	5.0	14	40.6	179



					2010-2014								2015-2017							
Rank	Census Tract Name	City	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
151	Census Tract 3524	Cambridge	47.91	17.0	2	49	131	92	29.3	213	43.5	194	2	64	128	106	21.2	173	52.8	210
152	Census Tract 8015.02	Springfield	47.81	5.0	3	69	107	79	27.4	205	73.4	254	4	99	168	125	21.1	171	69.0	244
153	Census Tract 505	Boston	47.61	7.0	4	86	207	122	19.2	146	60.1	229	2	70	119	101	10.9	77	62.1	232
154	Census Tract 512	Boston	47.50	5.0	4	91	199	116	23.3	182	39.7	183	6	132	263	162	13.6	105	36.1	168
155	Census Tract 1401.05	Boston	47.39	12.0	10	154	330	161	4.5	14	64.2	239	7	141	215	145	5.0	13	64.9	239
156	Census Tract 608	Boston	47.21	4.0	26	255	632	220	8.4	53	0.4	1	10	182	252	158	6.4	33	5.9	18
157	Census Tract 8026.01	Springfield	47.20	7.0	11	167	228	130	18.4	136	51.5	211	26	261	472	215	18.4	144	61.4	231
158	Census Tract 811	Boston	46.78	27.0	6	116	146	98	32.0	230	23.9	130	2	61	53	51	33.0	249	29.7	149
159	Census Tract 104.03	Boston	46.72	34.0	3	84	122	89	46.3	284	16.0	90	3	90	118	99	34.5	252	22.6	129
160	Census Tract 7329.01	Worcester	46.51	7.0	19	219	334	162	18.8	139	32.4	159	16	213	265	163	15.5	119	33.7	162
161	Census Tract 8014.02	Springfield	46.27	6.0	3	83	210	123	11.3	82	53.0	215	9	170	623	238	15.5	118	69.5	245
162	Census Tract 404.01	Boston	46.09	8.0	12	169	563	201	18.8	140	8.4	38	5	120	220	150	21.3	175	7.9	29
163	Census Tract 909.01	Boston	45.83	45.0	2	62	76	57	52.2	293	39.8	184	2	69	71	62	48.1	292	40.2	177
164	Census Tract 8001.01	Springfield	45.52	8.0	6	111	198	115	35.9	247	52.8	214	9	164	306	168	19.2	147	50.1	207
165	Census Tract 1204	Boston	45.49	6.0	17	207	312	154	16.0	121	24.5	134	8	159	144	114	11.0	79	17.4	95
166	Census Tract 105	Boston	44.87	39.0	4	93	130	91	34.9	245	19.9	120	5	121	161	122	27.4	220	22.0	123
167	Census Tract 7304.01	Worcester	44.82	9.0	8	133	189	112	18.7	138	41.4	189	7	148	181	128	20.9	167	36.3	171
168	Census Tract 3117	Lowell	44.81	7.0	13	179	368	170	17.0	128	16.6	97	13	205	337	182	24.1	194	15.3	79
169	Census Tract 7.04	Boston	44.47	30.0	8	137	199	117	27.2	204	16.6	99	5	114	109	92	26.6	213	17.7	99
170	Census Tract 8003	Springfield	44.24	9.0	7	125	211	124	19.0	145	57.1	225	12	200	398	194	13.8	107	59.7	225
171	Census Tract 1201.04	Boston	44.06	4.0	3	81	178	106	20.2	156	27.6	147	6	135	332	178	17.4	136	25.3	137
172	Census Tract 606	Boston	42.93	6.0	19	216	771	228	4.9	18	1.5	6	11	195	374	189	5.5	21	5.0	11
173	Census Tract 8015.01	Springfield	42.64	6.0	6	112	134	93	16.5	125	76.1	262	10	184	247	157	6.8	41	71.0	248
174	Census Tract 1	Boston	42.20	11.0	7	120	216	127	17.1	129	26.8	146	9	172	243	156	13.4	101	20.6	118
175	Census Tract 3122	Lowell	41.97	9.0	10	157	301	150	11.5	86	28.3	149	8	152	220	149	20.2	160	33.4	161
176	Census Tract 1402.01	Boston	41.82	6.0	7	123	344	167	8.6	54	48.1	204	4	110	227	152	6.3	31	54.3	213
177	Census Tract 3521.02	Cambridge	41.55	13.0	8	143	341	164	12.4	92	10.6	55	6	129	274	165	13.3	100	19.5	110
178	Census Tract 707	Boston	41.53	7.0	5	109	213	125	8.9	56	40.2	186	3	73	110	93	8.7	62	30.4	152
179	Census Tract 1401.02	Boston	41.03	9.0	7	121	187	110	9.4	58	55.4	220	5	118	114	98	6.4	35	66.3	240
180	Census Tract 107.02	Boston	40.91	16.0	10	160	449	186	7.9	43	7.3	33	7	150	306	169	6.7	39	6.8	24
181	Census Tract 1402.02	Boston	40.10	7.0	11	162	228	131	9.4	61	52.4	213	5	124	105	89	10.1	71	59.1	223



Rank	Census Tract Name	City	DIA	Student enroll (%)	2010-2014								2015-2017							
					Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
182	Census Tract 706	Boston	40.08	7.0	6	115	313	155	2.7	4	4.5	16	7	144	336	180	5.1	16	7.7	28
183	Census Tract 1304.04	Boston	39.86	8.0	12	168	427	179	4.5	13	25.0	138	6	130	218	148	5.4	20	30.9	153
184	Census Tract 3113	Lowell	39.83	12.0	11	161	344	168	15.8	119	17.7	109	10	173	326	176	13.9	109	15.0	77
185	Census Tract 406	Boston	39.41	8.0	16	196	628	218	7.5	39	6.9	28	5	123	196	135	2.5	4	6.8	25
186	Census Tract 1207	Boston	38.86	15.0	2	48	112	81	11.9	90	16.0	92	1	45	67	59	16.5	128	28.1	146
187	Census Tract 1104.03	Boston	38.70	6.0	5	106	138	94	14.2	102	54.0	218	5	117	129	108	12.2	91	47.9	201
188	Census Tract 2.02	Boston	38.16	11.0	7	124	234	132	22.7	175	23.9	129	6	134	197	136	18.2	143	29.9	151
189	Census Tract 7331.02	Worcester	38.11	6.0	5	103	278	145	7.6	40	25.5	139	7	149	392	192	11.0	78	23.3	133
n/a	Census Tract 8.03‡	Boston	38.11	92.0	10	155	171	104	34.7	243	17.2	105	3	86	49	46	31.1	242	19.1	108
190	Census Tract 6.01	Boston	37.95	16.0	8	138	287	148	22.0	170	9.3	44	8	157	234	155	13.4	102	13.1	63
191	Census Tract 101.04‡	Boston	37.20	54.0	5	101	106	78	26.6	198	14.3	82	3	85	63	58	23.5	190	13.4	69
192	Census Tract 203.02	Boston	37.16	16.0	3	82	317	158	13.1	98	3.7	10	4	109	443	209	12.0	90	2.7	3
193	Census Tract 7311.02	Worcester	36.29	10.0	6	118	308	152	9.5	64	24.5	133	7	136	342	185	10.4	75	20.7	119
n/a	Census Tract 101.03‡	Boston	36.13	93.0	7	131	200	118	42.8	273	12.1	67	1	27	27	27	37.1	260	15.9	85
n/a	Census Tract 102.04‡	Boston	36.12	74.0	4	88	117	87	39.3	263	7.0	29	2	60	60	56	41.2	276	11.2	46
194	Census Tract 7310.02	Worcester	36.00	8.0	8	145	167	103	19.8	153	30.6	154	5	119	102	85	21.6	177	25.9	139
195	Census Tract 3114	Lowell	35.17	13.0	7	127	139	95	18.0	135	26.3	141	5	125	112	95	20.7	166	27.9	144
196	Census Tract 604	Boston	34.65	10.0	15	193	315	156	9.4	59	4.5	17	9	169	172	126	11.5	88	4.5	9
197	Census Tract 7.01	Boston	34.32	33.0	3	72	85	60	30.8	220	16.2	94	1	46	32	32	27.0	217	16.3	87
n/a	Census Tract 104.04‡	Boston	34.15	80.0	3	78	53	37	64.9	304	14.2	81	1	18	13	11	59.0	300	14.1	75
199	Census Tract 5.04	Boston	33.73	23.0	4	96	101	75	30.9	222	11.4	62	4	108	100	83	25.2	203	10.7	44
200	Census Tract 7323.01	Worcester	33.27	9.0	8	141	269	140	4.3	8	13.2	74	7	147	193	134	5.2	17	22.7	130
201	Census Tract 3106.02	Lowell	33.22	7.0	5	99	104	77	15.0	109	19.0	119	9	167	213	144	19.9	154	19.1	109
202	Census Tract 1206	Boston	33.07	12.0	2	41	68	54	10.8	79	17.0	102	2	56	80	68	8.6	57	13.9	73
203	Census Tract 3105	Lowell	32.37	40.0	3	76	111	80	19.4	149	16.9	101	4	104	132	111	28.4	229	13.1	64
204	Census Tract 7323.02	Worcester	32.16	9.0	6	117	197	114	12.4	93	29.4	151	3	82	93	78	19.2	148	36.3	170
205	Census Tract 107.01	Boston	32.15	25.0	5	105	176	105	8.2	50	7.0	31	4	101	159	121	9.9	69	10.3	41
206	Census Tract 7328.02	Worcester	31.97	6.0	5	102	139	96	8.8	55	24.2	131	8	154	232	154	11.8	89	31.7	157
207	Census Tract 3525	Cambridge	31.93	14.0	2	37	65	51	15.2	113	17.8	110	2	72	92	77	14.6	113	18.3	102
208	Census Tract 3115	Lowell	31.63	9.0	4	90	152	100	19.8	152	18.6	116	1	32	44	39	27.9	225	32.8	159
209	Census Tract 8016.05	Springfield	31.58	5.0	3	79	94	67	22.1	171	39.2	181	4	103	130	109	24.6	198	43.0	188



Rank	Census Tract Name	City	DIA	Student enroll (%)	2010-2014								2015-2017							
					Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
<i>n/a</i>	<i>Census Tract 1034</i>	<i>Boston</i>	<i>31.49</i>	<i>93.0</i>	<i>1</i>	<i>24</i>	<i>20</i>	<i>15</i>	<i>27.5</i>	<i>206</i>	<i>14.1</i>	<i>80</i>	<i>1</i>	<i>31</i>	<i>19</i>	<i>17</i>	<i>23.1</i>	<i>187</i>	<i>15.7</i>	<i>83</i>
211	Census Tract 1105.01	Boston	31.16	3.0	8	144	304	151	11.7	87	28.9	150	3	87	106	90	11.2	80	13.6	70
212	Census Tract 8002.02	Springfield	30.24	1.0	2	44	182	109	7.9	41	37.3	177	2	62	201	137	16.3	126	45.9	194
213	Census Tract 3534	Cambridge	30.16	16.0	1	28	49	33	9.6	66	34.6	172	4	98	148	117	12.7	94	33.3	160
214	Census Tract 302	Boston	30.02	14.0	4	94	234	133	14.8	108	9.9	49	3	93	211	142	11.5	87	13.2	66
215	Census Tract 605.01	Boston	29.85	5.0	9	148	260	138	8.1	45	4.8	18	4	95	98	81	4.5	11	2.8	4
216	Census Tract 8016.02	Springfield	29.47	8.0	1	29	38	25	14.4	104	41.7	191	5	127	152	120	22.4	184	42.7	185
217	Census Tract 3527	Cambridge	29.29	13.0	2	50	98	73	15.3	114	32.6	161	0	15	18	16	11.5	86	16.5	88
218	Census Tract 4.01	Boston	28.72	19.0	4	98	94	68	25.3	191	12.6	72	2	49	35	33	27.4	221	6.6	23
219	Census Tract 3549	Cambridge	28.72	9.0	3	64	57	45	18.9	141	37.8	178	1	29	17	15	23.0	186	47.7	199
220	Census Tract 3123	Lowell	28.13	4.0	8	140	191	113	8.2	49	10.0	51	6	133	151	118	2.9	5	15.0	78
221	Census Tract 1303	Boston	27.76	7.0	8	134	215	126	0.2	2	6.8	27	7	143	191	132	0.9	2	9.0	33
222	Census Tract 8016.01	Springfield	27.65	25.0	2	51	50	36	19.0	144	34.3	169	5	126	133	112	16.6	129	37.1	172
223	Census Tract 3521.01	Cambridge	27.58	30.0	1	20	45	28	26.6	199	23.2	128	2	54	91	76	23.4	189	22.3	126
224	Census Tract 3526	Cambridge	27.26	13.0	1	17	34	23	29.6	216	18.0	111	1	34	45	42	21.3	176	23.7	134
225	Census Tract 1106.07	Boston	26.59	6.0	7	132	164	102	14.2	101	16.8	100	5	116	103	88	5.3	19	14.1	74
226	Census Tract 3535	Cambridge	26.49	15.0	1	35	58	46	30.6	218	31.8	156	1	26	45	43	6.8	40	18.8	106
227	Census Tract 203.01	Boston	26.35	13.0	4	87	143	97	11.9	89	2.3	8	2	52	74	65	12.8	95	11.2	48
228	Census Tract 2.01	Boston	26.03	16.0	3	70	97	72	13.2	99	14.5	84	4	111	124	105	14.5	112	11.3	49
<i>n/a</i>	<i>Census Tract 3531.024</i>	<i>Cambridge</i>	<i>25.75</i>	<i>92.0</i>	<i>1</i>	<i>21</i>	<i>22</i>	<i>16</i>	<i>31.5</i>	<i>226</i>	<i>13.3</i>	<i>75</i>	<i>2</i>	<i>53</i>	<i>35</i>	<i>34</i>	<i>22.5</i>	<i>185</i>	<i>13.9</i>	<i>72</i>
230	Census Tract 104.08	Boston	25.45	26.0	0	7	14	10	22.4	173	9.5	46	0	14	25	24	19.5	149	10.4	42
231	Census Tract 401	Boston	25.26	3.0	6	119	336	163	2.1	3	6.4	25	1	39	61	57	2.3	3	5.2	14
232	Census Tract 4.02	Boston	25.20	25.0	3	75	112	82	23.2	180	9.4	45	2	48	55	52	17.8	139	9.5	37
233	Census Tract 7303	Worcester	24.64	6.0	7	122	180	108	12.2	91	8.5	39	7	151	178	127	8.7	60	18.9	107
<i>n/a</i>	<i>Census Tract 5.024</i>	<i>Boston</i>	<i>24.58</i>	<i>63.0</i>	<i>3</i>	<i>67</i>	<i>47</i>	<i>31</i>	<i>31.2</i>	<i>223</i>	<i>11.1</i>	<i>59</i>	<i>0</i>	<i>10</i>	<i>6</i>	<i>8</i>	<i>20.1</i>	<i>159</i>	<i>11.5</i>	<i>52</i>
235	Census Tract 304	Boston	23.99	13.0	4	89	153	101	9.7	69	3.1	9	3	76	101	84	9.7	68	6.0	21
236	Census Tract 3522	Cambridge	23.89	9.0	1	15	35	24	17.1	131	18.2	113	1	42	82	71	15.6	120	23.1	132
237	Census Tract 7310.01	Worcester	23.88	10.0	2	39	91	64	8.2	51	18.3	115	1	22	37	35	5.1	15	20.0	113
238	Census Tract 3542	Cambridge	23.61	6.0	1	30	55	41	5.7	24	4.8	19	3	84	114	97	4.7	12	5.1	12
239	Census Tract 3532	Cambridge	22.71	37.0	1	22	22	17	14.3	103	15.9	89	2	63	43	38	16.8	130	16.9	91
240	Census Tract 3546	Cambridge	22.03	9.0	3	77	70	55	10.2	75	26.8	145	1	24	22	18	7.9	50	20.1	114



					2010-2014								2015-2017							
Rank	Census Tract Name	City	DIA	Student enroll (%)	Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
241	Census Tract 8016.03f	Springfield	21.99	5.0	2	38	48	32	17.3	132	34.5	171	4	107	139	113	8.2	52	31.2	155
242	Census Tract 1304.02	Boston	21.84	3.0	5	104	119	88	5.9	25	10.9	57	4	112	107	91	6.9	43	12.4	59
243	Census Tract 3533	Cambridge	21.84	15.0	2	47	63	50	6.9	32	12.3	68	3	81	86	74	7.5	46	11.5	51
244	Census Tract 7328.01	Worcester	21.80	10.0	2	56	55	39	8.0	44	21.0	123	2	59	44	41	11.3	85	22.4	128
245	Census Tract 8026.02	Springfield	21.69	4.0	1	26	75	56	7.1	36	4.3	15	2	65	118	100	13.6	106	11.8	55
246	Census Tract 3116	Lowell	21.60	7.0	4	85	88	62	9.9	73	17.4	108	3	91	79	66	12.4	92	11.8	56
247	Census Tract 3125.01	Lowell	21.46	4.0	4	92	128	90	10.4	77	12.4	70	2	68	68	60	12.7	93	18.7	105
248	Census Tract 7322.02	Worcester	21.16	6.0	1	18	33	22	16.8	127	12.5	71	3	78	102	86	16.2	125	16.3	86
249	Census Tract 7331.01	Worcester	21.01	8.0	3	66	152	99	5.2	20	15.7	87	1	36	80	67	13.1	99	19.8	112
250	Census Tract 3539	Cambridge	21.01	75.0	0	8	3	5	20.7	158	16.0	91	0	5	0	1	26.9	216	17.7	100
251	Census Tract 3106.01	Lowell	20.52	8.0	2	55	39	26	6.0	27	20.4	121	4	97	73	64	6.0	26	26.8	141
252	Census Tract 1201.03	Boston	20.50	9.0	2	60	203	120	5.9	26	10.2	53	0	8	25	25	3.9	8	8.7	32
n/a	Census Tract 3537z	Cambridge	20.42	62.0	2	58	42	27	19.6	151	13.3	76	2	58	31	30	16.4	127	12.8	61
254	Census Tract 3.01	Boston	20.35	10.0	2	54	92	66	14.1	100	9.6	48	1	25	41	36	8.5	56	17.5	97
255	Census Tract 3528	Cambridge	20.31	17.0	0	11	19	14	10.4	76	12.3	69	1	41	68	61	11.2	81	17.6	98
256	Census Tract 603.01	Boston	20.14	6.0	6	113	201	119	7.1	34	1.0	3	0	12	10	10	8.4	54	2.5	2
257	Census Tract 202	Boston	20.11	15.0	3	80	86	61	16.6	126	9.2	43	1	28	28	28	13.9	108	13.3	67
258	Census Tract 602	Boston	20.00	5.0	2	42	95	70	7.4	38	0.6	2	2	50	81	69	6.1	29	1.0	1
259	Census Tract 7308.02	Worcester	19.87	11.0	2	43	117	86	6.3	30	3.7	11	2	47	100	82	15.9	124	13.9	71
260	Census Tract 3523	Cambridge	19.69	16.0	2	40	54	38	17.1	130	15.4	86	0	6	0	3	15.1	117	19.6	111
261	Census Tract 8024	Springfield	19.66	7.0	3	65	89	63	6.3	29	32.6	162	3	89	102	87	8.9	64	26.4	140
262	Census Tract 7322.01	Worcester	19.59	12.0	1	31	56	43	11.1	80	20.7	122	2	67	81	70	18.0	141	15.4	80
263	Census Tract 301	Boston	18.86	13.0	2	59	103	76	17.4	133	1.3	5	3	80	123	104	7.6	48	4.2	8
264	Census Tract 3538	Cambridge	18.60	20.0	0	12	9	6	16.0	122	11.3	61	4	96	84	73	15.7	121	12.5	60
265	Census Tract 3540	Cambridge	18.58	45.0	4	97	116	85	11.4	84	11.0	58	1	33	25	23	19.1	146	11.2	47
266	Census Tract 7329.02	Worcester	18.57	98.0	0	4	0	4	47.4	285	7.8	35	0	2	0	6	47.7	291	15.8	84
267	Census Tract 3543	Cambridge	18.49	6.0	2	36	57	44	15.9	120	17.0	103	1	38	52	50	8.3	53	18.0	101
268	Census Tract 601.01	Boston	18.08	8.0	2	57	67	53	10.8	78	3.9	12	4	106	123	103	4.0	9	3.3	5
269	Census Tract 201.01	Boston	17.44	5.0	4	95	115	84	4.4	11	2.1	7	2	66	47	44	5.2	18	5.5	15
270	Census Tract 7301	Worcester	17.09	9.0	3	74	66	52	9.2	57	26.5	143	3	74	57	53	8.7	61	17.0	92
271	Census Tract 5.03	Boston	16.91	30.0	0	5	11	7	29.6	215	7.1	32	0	3	0	5	20.3	161	5.8	17



Rank	Census Tract Name	City	DIA	Student enroll (%)	2010-2014								2015-2017							
					Avg arrests / year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank	Avg arrests /year	Rank	Avg arrests/ 100k	Rank	Poverty Rate (%)	Rank	Black/Latino (%)	Rank
272	Census Tract 3.02	Boston	16.90	14.0	2	53	82	58	22.3	172	6.3	24	2	51	59	55	11.3	84	15.5	81
273	Census Tract 305	Boston	16.45	13.0	1	27	47	29	8.2	48	1.3	4	2	71	96	80	9.5	67	5.9	20
274	Census Tract 8025	Springfield	16.31	7.0	3	68	47	30	4.2	7	21.9	126	3	75	48	45	10.5	76	29.7	150
275	Census Tract 7302	Worcester	15.26	6.0	1	34	33	21	8.3	52	16.4	96	0	7	0	2	8.6	59	11.8	57
276	Census Tract 3550	Cambridge	15.15	7.0	1	19	32	20	9.9	71	24.7	136	1	43	50	47	10.2	73	17.1	93
277	Census Tract 3547	Cambridge	14.36	13.0	1	25	55	40	4.8	17	13.9	78	0	13	14	12	8.8	63	9.8	38
278	Census Tract 1302	Boston	13.79	6.0	2	52	49	34	4.4	10	10.0	50	3	83	72	63	8.6	58	7.2	26
279	Census Tract 7309.02	Worcester	13.55	37.0	1	23	30	19	11.8	88	16.1	93	0	9	9	9	17.0	133	16.6	89
280	Census Tract 7307	Worcester	13.12	10.0	3	71	49	35	7.1	35	18.3	114	1	40	23	20	6.4	36	21.6	122
281	Census Tract 3541	Cambridge	12.74	23.0	2	63	96	71	4.6	15	8.7	40	1	20	26	26	4.3	10	9.3	35
282	Census Tract 1301	Boston	12.74	6.0	5	100	99	74	3.4	5	4.1	13	2	57	31	31	3.0	6	8.1	30
<i>n/a</i>	<i>Census Tract 7312.02‡</i>	<i>Worcester</i>	<i>12.49</i>	<i>100.0</i>	<i>1</i>	<i>16</i>	<i>55</i>	<i>42</i>	<i>0.0</i>	<i>1</i>	<i>15.7</i>	<i>88</i>	<i>1</i>	<i>37</i>	<i>90</i>	<i>75</i>	<i>0.0</i>	<i>1</i>	<i>18.4</i>	<i>104</i>
284	Census Tract 3545	Cambridge	12.31	13.0	0	1	0	2	12.4	94	11.9	65	1	30	51	49	11.2	83	10.3	40
285	Census Tract 1201.05	Boston	12.08	17.0	1	14	29	18	9.5	65	10.1	52	0	16	15	13	5.9	24	9.0	34
286	Census Tract 3125.02	Lowell	12.00	5.0	2	46	59	47	4.9	19	6.5	26	3	77	82	72	5.5	22	6.5	22
287	Census Tract 108.01	Boston	11.68	15.0	2	45	62	49	5.2	21	4.9	20	2	55	58	54	6.1	28	8.3	31
288	Census Tract 8016.04	Springfield	11.66	6.0	0	9	13	9	4.6	16	17.2	104	1	35	42	37	3.8	7	24.6	135
289	Census Tract 3536	Cambridge	11.65	47.0	0	3	0	1	9.7	70	14.4	83	1	23	15	14	7.3	45	15.7	82
290	Census Tract 108.02	Boston	11.12	16.0	0	10	14	11	9.4	60	7.0	30	1	44	44	40	6.5	37	11.0	45
291	Census Tract 7306	Worcester	11.00	26.0	1	32	17	13	4.4	12	11.8	64	4	100	51	48	6.0	27	13.1	65
292	Census Tract 7309.01	Worcester	10.85	12.0	3	73	95	69	9.6	67	11.5	63	1	19	23	21	5.8	23	10.6	43
293	Census Tract 7308.01	Worcester	8.87	7.0	2	61	82	59	3.5	6	5.8	23	1	21	23	22	6.6	38	3.3	6
294	Census Tract 3529	Cambridge	8.44	8.0	1	33	59	48	9.7	68	5.1	21	0	4	0	4	8.0	51	4.2	7
295	Census Tract 1106.01	Boston	8.37	4.0	0	13	17	12	8.1	46	8.2	36	1	17	28	29	7.2	44	10.2	39
296	Census Tract 3544	Cambridge	7.45	10.0	0	2	0	3	8.1	47	8.2	37	0	11	23	19	6.3	32	12.2	58
297	Census Tract 3548	Cambridge	5.77	10.0	0	6	11	8	5.2	22	8.8	41	0	1	0	7	6.0	25	9.3	36

Note: 15 Tracts grayed out and italicized had more than 50% of residents in undergraduate or graduate degree programs (‡), "-" indicates tract did not have data in that time period.



Memorandum Deliberative Process

To: Shawn Collins, Executive Director
Cc: Kyle Potvin, Director of Licensing
Rebecca Lopez, Enforcement Counsel
From: Yaw Gyebi Jr., Chief of Investigations and Enforcement
Date: May 12, 2023
Subject: Microbusiness Policy Modification Options—FOR INFORMATIONAL
PURPOSES ONLY
Importance Level: Routine

PURPOSE: To provide the Executive Director (“ED”) with options for policy modifications regarding current license and canopy limitations on Microbusiness applicants and licensees.

REQUEST ACTION BY: N/A

BACKGROUND:

Commission staff have heard from Microbusiness applicants and licensees through various sources that their inability to apply for other license types, e.g., retail, or to increase their tier and canopy allowances, has presented a burden to business growth in the industry.

Pursuant to 935 CMR 500.050(5), Microbusinesses are licensees who can operate as a Tier 1 Marijuana Cultivator and/or Product Manufacturer. If the Microbusiness is held, owned, and operated by a majority of Economic Empowerment Priority Applicants and/or Social Equity Participants, the licensee may also apply for a Delivery Endorsement and sell and deliver their marijuana products to consumers. Additionally, a Microbusiness Licensee is specifically allowed to apply for a Social Consumption license subject to the same social equity participation requirements previously stated for the Delivery Endorsement and subject to implementation.

However, Microbusinesses, or the individuals and entities associated with such license, may not apply for any additional license types. Microbusiness cannot obtain a retail, or cultivation license at a higher tier, which could facilitate the growth of the overall business.

With this barrier to growth, and considering the Commission’s mission towards small businesses, staff have provided suggestions to reevaluate and modify the current policy limitations facing Microbusinesses for ED consideration.



Generally, factors to consider in modifying the current Microbusiness policy include the following:

- Allowing Microbusinesses to remain Microbusinesses but afford opportunities for growth.
- Policies regarding fee reductions and expedited review to remain solely with Microbusiness applications and licenses (and others specifically stated within the regulations) but not extend to future license types applied for by Microbusiness licensees.
- Ensuring the ability of Microbusinesses to transition into other license types (i.e., a retail, or cultivation license at a higher tier) through the established license process, as other applicants and licensees have, without any actual or perceived additional benefits not entitled to others.
- Ensuring Microbusiness licensees are held to the same license and canopy limitations as all other applicants and licensees.

The Commission can modify its policies relative to Microbusinesses through regulatory changes to realize policy objectives of supporting their ability to expand and transition into other license types. The pertinent and affected regulations that would be impacted are the following:

#1: 935 CMR 500.002: Definitions (Microbusiness)

Description of Proposed Change: Minimal change required to ensure that Microbusinesses that obtain additional Marijuana Product Manufacturing licenses are not limited to the amount of marijuana it may obtain under a separate Marijuana Product Manufacturing license.

*“Microbusiness means an entity that can be either a Tier 1 Marijuana Cultivator or Marijuana Product Manufacturer or both, in compliance with the operating procedures for each License and, if in receipt of a Delivery Endorsement issued by the Commission, may deliver Marijuana or Marijuana Products produced at the licensed location directly to Consumers in compliance with established regulatory requirements for retail sale as it relates to delivery. A Microbusiness that **conducts operations under said license as is** a Marijuana Product Manufacturer may purchase no more than 2,000 pounds of Marijuana per year from other Marijuana Establishments for the purpose of Marijuana Product manufacturing by the Licensee **unless an additional and separate Marijuana Product Manufacturing license is obtained by the Microbusiness licensees.**”*

#2: 935 CMR 500.005(1)(b)(1)(a): Application Fees

Description of Proposed Change: Minimal change required to ensure that application fee waivers



apply solely to those applying for a Microbusiness as modified below:

(b) Waiver of Fees.

1. Application fees are waived for:
 - a. **Applicants for** Microbusinesses;

#3: 935 CMR 500.005(1)(b)(4)(b): Metrc Fees

Description of Proposed Change: Minimal change required to ensure that Metrc fee waivers apply solely to the Microbusiness license and not the licensee in general for any other licenses obtained and not specifically stated/listed, as modified below:

4. *Seed-to-sale SOR monthly program fees are waived for:*
 - a. *Craft Marijuana Cooperatives;*
 - b. *Microbusinesses Licenses;*

#4: 935 CMR 500.050(1)(b)(1): Control Limitations (licenses)

Description of Proposed Change: Moderate change required to ensure Microbusiness licenses count towards total Marijuana Cultivation and/or Product Manufacturing license limits, as modified below:

(b) *Control Limitations.*

1. *No Person or Entity Having Direct or Indirect Control shall be granted, or hold, more than three licenses in a particular class, except as otherwise specified in 935 CMR 500.000. Microbusiness Licensees performing cultivation operations shall have the Microbusiness license count towards the total limit on Marijuana Cultivation licenses granted or held for any Person or Entity Having Direct or Indirect Control. Additionally, Microbusiness Licensees performing product manufacturing operations shall have the Microbusiness license count towards the total limit on Marijuana Product Manufacturing licenses granted or held for any Person or Entity Having Direct or Indirect Control.*

#5: 935 CMR 500.050(1)(b)(5): Control Limitations (canopy)

Description of Proposed Change: Minimal change required to ensure Microbusiness licenses held count towards total Marijuana Cultivation license and canopy limits, as modified below:

5. *Any Person or Entity Having Direct or Indirect Control, or Licensee, shall be limited to a total of 100,000 square feet of Canopy distributed across no more than a combined number of three cultivation Licenses or Microbusiness Licenses, if applicable, under 935 CMR 500.000 and three MTC Licenses. A Craft Marijuana*



Cooperative Licensee shall be limited to one license and a total of 100,000 square feet of Canopy.

#6: 935 CMR 500.050(5)(a): Marijuana Microbusiness (stated operations)

Description of Proposed Change: Minimal change required to ensure that Microbusinesses that obtain additional Marijuana Product Manufacturing licenses are not limited to the amount of marijuana it may obtain under a separate license (same as #1 above).

*“Microbusiness means an entity that can be either a Tier 1 Marijuana Cultivator or Marijuana Product Manufacturer or both, in compliance with the operating procedures for each License and, if in receipt of a Delivery Endorsement issued by the Commission, may deliver Marijuana or Marijuana Products produced at the licensed location directly to Consumers in compliance with established regulatory requirements for retail sale as it relates to delivery. A Microbusiness that **conducts operations under said license as is** a Marijuana Product Manufacturer may purchase no more than 2,000 pounds of Marijuana per year from other Marijuana Establishments for the purpose of Marijuana Product manufacturing by the Licensee **unless an additional and separate Marijuana Product Manufacturing license is obtained by the Microbusiness licensees.**”*

#7: 935 CMR 500.050(5)(c): Marijuana Microbusiness (limitation on other licenses)

Description of Proposed Change: Minimal change required to ensure that Microbusinesses may obtain additional licenses, as stated below:

*(c) A Microbusiness Licensee may ~~not~~ be a Person or Entity Having Direct or Indirect Control for any other Marijuana Establishment, except an **Independent Testing Laboratory Social Consumption Establishment**. A majority of the Microbusiness' Executives or Members shall have been residents of Massachusetts for no less than 12 months prior to application.*

#8: 935 CMR 500.050(5)(d): Marijuana Microbusiness (fees)

Description of Proposed Change: Minimal change required to ensure compliance with current application fee structure and not to apply any waivers outside of the Microbusiness license unless otherwise provided, as stated below:

*(d) ~~Application fees and~~ **License fees for Microbusinesses licenses** shall be set at 50% of the combined sum of the ~~application fees and~~ license fees for all the cultivation or manufacturing activities in which the Licensee engages.*



#9: 935 CMR 500.101(5)(a)-(b): Expedited Applicants

Description of Proposed Change: No change required.

(5) Expedited Applicants. Following the review of applications submitted by priority applicants, applications submitted by Expedited Applicants shall be reviewed.

(a) The following applicants are eligible to be considered Expedited Applicants:

1. Social Equity Participants;
2. Marijuana Microbusiness applicants;
3. Marijuana Craft Marijuana Cooperative applicants;
4. Independent Testing Laboratory applicants;
5. Outdoor Marijuana Cultivator applicants; or
6. Minority, women, and veteran-owned businesses.

(b) Eligibility Criteria

1. Applicants for Marijuana Microbusinesses, Craft Marijuana Cooperatives, Independent Testing Laboratories, and Outdoor Marijuana Cultivators are only eligible for expedited review for those specific applications only and no other type of license application.

RECOMMENDATION: N/A

EXECUTIVE DIRECTOR DECISION: N/A

Memorandum

To: Shawn Collins, ED & Mercedes Erickson, PM
Cc: Alisa Stack, COO, Cedric Sinclair, CCO, Paul Clark, CTIO, Kyle Potvin, DOL, Rebecca Lopez, EC, Nomxolisi Khumalo, DOI, James Kocis, DOT, IMs, LMs, AECs, LTM, and LAs
From: Yaw Gyebi Jr., CIE
Date: July 7, 2023
Subject: I&E's Municipal Equity Impact Statement

I. Introduction & Purpose

Leadership of the Commission's Investigations and Enforcement department ("I&E") have had an opportunity to review the Municipal Equity Working Group's ("WG") proposed policies and regulations following the passage of c.180 of the Acts of 2022 ("Act"). This memorandum represents I&E's professional opinions of those recommended policies and regulations in addition to the likely impacts, if promulgated as is, that they would have on the I&E and its team.

At a high level, I&E will address the following:

- Policy recommendation concerns that may lead to implementation issues, policy confusion, statutory mandates that remain unaddressed, and unnecessary deviation from the scope of those mandates with regards to certain policies.
- Likely impacts for I&E in the areas of MassCIP/IT-related platforms, updates to guidance documents and FAQs, creation of new forms, notices, and applications, projections on the need for additional staffing, and the possibility of interruption to the exceptional customer service currently provided by the teams to the Commission's constituencies.
- Propose alternative draft regulations for Commission consideration that account for I&E's concerns while covering each mandate set by the Legislature in its passage of the Act, to the extent possible.

I&E Leadership appreciates and thanks the ED and PM for this opportunity to share our opinions and thoughts regarding this important matter.



II.
Policy Recommendation Concerns

Potential

Following the review of the proposed policies and regulations, I&E have identified the following policy recommendation concerns that may lead to implementation issues, policy confusion, statutory mandates that remain unaddressed, and unnecessary deviation from the scope of those mandates with regards to certain policies.

a. Misinterpretation and Use of “Social Equity Business” (“SEB”)

Based on its interpretation of a new term introduced through the Act that has wide ranging implications, the WG has recommended a verification of “Social Equity Business” status. The WG provides the following: *“Under Chapter 180, Social Equity Businesses include applicants that have not only gone through the Commission’s Social Equity Program and/or are certified Economic Empowerment Priority Applicants, but also applicants that are eligible for these programs and have not necessarily been accepted into these programs.”* In various other sections of the WG recommendations, there are instances of the WG using the following string of terms: *“Social Equity Business applicants, applicants that are Social Equity Program Participants, and Economic Empowerment Priority Applicants”*.

The Act defines SEB as the following: *“a marijuana establishment with not less than 51 per cent majority ownership of individuals who are eligible for the social equity program under section 22 or whose ownership qualifies it as an economic empowerment priority applicant as defined by the commission’s regulations promulgated pursuant to section 4.”* The Commission’s statute further defines Marijuana Establishment as *“a marijuana cultivator, independent testing laboratory, marijuana product manufacturer, marijuana retailer or any other type of licensed marijuana-related business.”* (emphasis added).

It appears that SEB was intended to encompass those businesses with majority ownership of Social Equity Program Participants (“SEP”) and Economic Empowerment Priority Applicants (“EE”)—essentially, a turn of phrase to encapsulate the existing populations and not become a third population of its own. Additionally, the definition specifically starts with “a marijuana establishment...” which lends credence to its purpose and the need for it to be an already licensed business by the Commission.

SEB also seems to be a corollary term for process interactions between the Commission and the Massachusetts Department of Revenue (“DOR”) based on § 4 and 5 of the Act, in which the Legislature provided a monetary incentive for municipalities that have SEBs within their borders. The relevant sections are as follows:

SECTION 4. Section 1 of chapter 64N of the General Laws, as so appearing, is hereby amended by adding the following subsection:-

(c) “Social equity business”, a marijuana retailer that is a social equity business, as defined in section 1 of chapter 94G.

SECTION 5. Section 2 of said chapter 64N, as so appearing, is hereby amended by adding the following paragraph:-

A sum equal to 1 per cent of the total sales price received under this section from a marijuana retailer that is a social equity business, as defined in section 1 of chapter 94G, shall, not less than quarterly, be distributed, credited and paid by the state treasurer upon certification of the commissioner to each city or town that has at least 1 marijuana retailer that is a social equity business, in proportion to the amount of the sums received from the sale of marijuana or marijuana products by any such marijuana retailer in the city or town. Any city or town seeking to dispute the commissioner's calculation of its distribution under this paragraph shall notify the commissioner, in writing, not later than 1 year from the date the money was distributed by the commissioner to the city or town.

If the WG’s interpretation of SEB is adopted, policy and terminology confusion are anticipated to be high among the Commission’s constituencies, especially those who are the intended beneficiaries of said policy initiatives. Additionally, misperceptions of the SEP process and benefits are likely. It could also lead to an illogical result regarding the utilization of the actual SEP currently administered by the Communication’s Social Equity Team as some individuals and businesses may utilize the SEB verification, believe it to be acceptance into the SEP program, and/or just not seek to enter the SEP program.

Lastly, creating a third category of individuals and businesses that the Commission must serve—namely, individuals who would/could qualify for SEP/EEA status if pursued—would not only conflict with the plain statutory language, but also require the Commission to divert its limited resources from processing licensing applications, equity applications, and/or overseeing licensees and license applicants to initially verifying and monitoring ongoing eligibility of an indefinite number of individuals and businesses who may or may not submit an application to the Commission. This would be imprudent, particularly where I&E faces an inevitable and unavoidable increase in demand on its resources due to other provisions of the Act, including expansion of oversight responsibilities over municipalities/Host Communities.

I&E recommends that the Commission amend the WG’s proposed policies to make clear that SEBs are those who have already been accepted in the existing program or are Economic Empowerment Priority Applicants and, if true, the proposed business is held by a majority of those individuals. This will result in increased clarity regarding policies and process and be consistent with the Legislature’s intent, as evidenced by the plain language of the statute.

- b. SEB Application Recommendation Exceeds the Scope of the Legislature’s Mandate and is Duplicative

I&E has identified certain recommendations that appear to exceed the scope of the Legislature’s mandate in the Act, which charges the Commission with establishing and enforcing equity requirements on Host Communities and municipalities, by shifting additional responsibilities to the Commission through significant systemic changes such as the creation of a duplicative application process for SEBs.

For example, the WG proposed the following: *“An applicant may file, in a form and manner specified by the Commission, an application for verification as a Social Equity Business. The Commission shall act on an application for verification within [XX] days of receipt. Once the Commission has confirmed that the application is complete and the applicant qualifies as a Social Equity Business, it will certify the applicant’s status as a Social Equity Business.”* There appears to be a new application and the need for action but no stated qualifications for said review—in the absence of factors to consider for compliance criteria or standards, this process may lead to perceived or actual arbitrary and capricious results. Additionally, the proposed verification process for a SEB, appears to be an I&E Licensing team function. If correct, assessments of eligibility to be a SEB and SEP will be conducted by two separate Commission teams at different points in time—this could lead to inconsistent results and frustration amongst the Commission’s constituencies, especially those who are the intended benefits of said policy initiatives.

I&E recommends amending this policy recommendation to include standards and compliance criteria and requirements for SEB applications. Alternatively, Enforcement predominantly suggests that the burden of verifying an individual or business’ status as a SEP or EE be placed on the Host Community/municipality. The Commission’s role should be secondary – Enforcement suggests that the Commission consider establishing a point of contact in house or providing another mechanism within the Commission to assist towns with verification of SEP/EEA status.

c. Absence of procedures and policies regarding exchange of information with the Department of Revenue.

I&E’s review of the WG’s recommendations did lead to a discovery of another statutory mandate that appears to remain unaddressed by the Commission, regarding its obligations to provide certain information to DOR relative to SEBs. This statutory mandate may not have been part of the WG charter, as it appears to have been a last-minute amendment made by the Legislature which took effect on November 10, 2022.

G.L. c. 94G, § 4(a½) states that:

“The Commission shall, in accordance with chapter 30A, adopt regulations consistent with this chapter for the administration, clarification and enforcement of laws regulating and licensing marijuana establishments. The regulations shall include:

(xxxviii) procedures and policies for the commission to provide the department of revenue with a list of businesses that qualify as social equity businesses to facilitate the department of revenue's timely certification of the amounts required to be distributed, credited and paid to cities and towns pursuant to section 5 of chapter 64N."

I&E recommends that the Commission consider this statutory mandate of the Act when approving draft regulations.

d. Pre-Certification Expansion & Background Check Verification

Pre-certification Expansion: The WG has also recommended extending pre-certification applications for every license type for EEs and SEPs. This recommendation, if adopted, will result in the creation of 24 new license applications in MassCIP—12 new pre-certification and 12 provisional license applications.

Following the implementation of this policy, MassCIP users may be confused or overwhelmed by the license application types they can apply for. For example, following implementation, when a MassCIP user enters the system to apply for a Marijuana Retailer, the user will essentially see three (3) related Marijuana Retailer applications: the current full version application, the retail pre-certification application, and the retail provisional license application. This could lead to significant process confusion for the Commission's constituencies, especially those who are the intended benefits of said policy initiatives. Additionally, this recommendation could pose significant inefficiencies and confusion for staff and unnecessarily elongate an already lengthy licensing process.

I&E suggests that the Commission rescind or decline to adopt this policy recommendation because it exceeds the scope of the Legislature's mandate, making it an unnecessary change for purposes of the Commission's obligation to promulgate regulations consistent with the Act on or before November 9, 2023. Alternatively, I&E recommends restructuring the recommendation and existing regulations to build out a single pre-certification option, regardless of license type, that could be utilized with a single set of requirements to demonstrate the propensity to operate a Marijuana Establishment.

Background Check Verification: The WG also proposes the possibility of pre-certification applicants to submit their own background check and receive verification from the Commission regarding their suitability. *"In addition, providing the opportunity to submit a complete background check at the precertification stage grants an initial opportunity to verify suitability without requiring the full capital investment required by a Provisional License Application."*

The premise behind adding this option, at least from conversations, is to ensure applicants are aware of potential suitability issues that may prevent being licensed—as an aside, it seems to

stem from complaints by pre-certification applicants not being told of these issues.

The pre-certification currently asks for background check disclosures. Additionally, the pre-certification application process was originally created for EEs and SEPs applying for Marijuana Delivery licenses to be a “no cost” option for those individuals and businesses. However, it should be noted, that all background check disclosures in pre-certification are reviewed and if events are identified as potential suitability issues, it stops the pre-certification process and triggers the suitability process—however, it does require that the applicant actually comply with the requirement of full disclosure of criminal events for all listed individuals and businesses. Additionally, the Commission currently has a yes/no suitability pre-screen application solely available to SEPs that can tell applicants of potential mandatory or presumptive suitability issues—also at no cost to them.

Under the WG recommendation, applicants who submit background check reports at the pre-certification application will incur approximately a cost of \$475 per person on the application. They will also be required to undergo the Commission’s statutorily required background check and fingerprinting requirements after their provisional license application is deemed complete—which will require additional payments—and still may differ in scope than the initial background check supplied and produced by the applicant. That difference in scope means that new information could still be obtained by the Commission and serve as grounds for a different suitability result. As a result, having two background check points could lead to duplication of staff resources, requiring two instances of suitability review and analysis of the same applicant, and additional costs to individuals and businesses, especially those who are the intended benefits of said policy initiatives.

I&E suggests that the Commission rescind or decline to adopt this policy recommendation because it exceeds the scope of the Legislature’s mandate, making it an unnecessary change for purposes of the Commission’s obligation to promulgate regulations consistent with the Act on or before November 9, 2023. Alternatively, I&E recommends requiring that all pre-screen suitability applications be available for all individuals seeking licensure and that it be completed by all prior to submitting a pre-certification application. The Commission has a tool in place that is free and available to applicants who can assess how their criminal history interacts with the Commission’s suitability tables. The tool is effective, so long as the applicant is truthful in the information submitted. The Commission should reserve its limited resources by using and, where necessary, improving upon the tools and mechanisms already at its disposal, rather than expending time and resources to create new, ineffective administrative processes.

e. Municipal Response Time Frame

The WG proposed the following: *“To expedite the Commission’s review of Social Equity Business applications and applications from businesses controlled by and with majority ownership comprised of Economic Empowerment Priority Applicants or Social Equity Program Participants, the Commission shall request from the Host Community correspondence certifying that the Social Equity Business applicant’s*

proposed Marijuana Establishment complies with municipal bylaws or ordinances. The Host Community shall respond to the Commission within 30 days of receipt of that correspondence.”

Notwithstanding the above comments about “Social Equity Business” concerns, I&E finds that reducing the 60-day response period to 30 days would create more efficiency in the licensing process. However, having dual and distinct policies for separate groups of applicants could create confusion for the Commission’s constituencies. Instead, I&E recommends reducing the 60-day municipal response to 30 days for all license applicants.

f. Absence of Sufficient Minimum Acceptable Standards for Host Communities to Positively Impact Disproportionately Harmed Communities

G.L. c. 94G, § 3(d)(5) requires the Commission to “*promulgate regulations to establish minimum acceptable standards for host communities to...positively impact [disproportionately harmed] communities.*”

As written, the WG recommendations and draft regulations include minimum acceptable standards for how Host Communities must promote and encourage full participation by individuals from disproportionately harmed communities. The policy recommendations and draft regulations do not sufficiently establish a minimum acceptable standard governing how Host Communities must positively impact communities that were disproportionately harmed by Marijuana prohibition and enforcement.

I&E recommends that the Commission consider the full scope of this statutory mandate of the Act when approving draft regulations. I&E has provided revised draft regulations for the Commission’s consideration.

g. Absence of Sufficient Criteria for Allowing MEs/MTCs to Donate Revenue to the Social Equity Trust Fund as part of its Positive Impact Plan

G.L. c. 94G, § 4(a^{1/2})(xxxv) mandates that the Commission promulgate regulations setting “*criteria for allowing marijuana establishments and medical marijuana treatment centers to satisfy their positive impact plan requirement for licensure in part by donating a percentage of their revenue to the Cannabis Social Equity Trust Fund established in subsection (a) of section 14A.*”

As written, the WG recommendations and draft regulations do not sufficiently establish criteria in accordance with this mandate.

I&E recommends that the Commission consider the full scope of this statutory mandate of the Act when approving draft regulations. I&E has provided revised draft regulations for the Commission’s consideration.

h. Absence of Policies, Procedures, and Minimum Acceptable Standards Governing Host Communities During Actual HCA Negotiations with SEBs and SEP/EEA License Applicants

G.L. c. 94G, § 4(a)(xxxii)-(xxxiii) together confer the Commission with the following powers, respectively: “*the power to establish procedures and policies for municipalities to promote and encourage full participation in the regulated marijuana industry during negotiations of host community agreements with social equity program businesses and economic empowerment priority applicants;*” and the power to “*develop....minimum acceptable standards....for municipalities and prospective licensees during negotiations of host community agreements with social equity businesses.*”

As written, the WG recommendations and draft regulations do not sufficiently establish minimum acceptable criteria or policies or procedures governing Host Communities or municipalities during HCA negotiations with social equity businesses.

I&E recommends that the Commission consider the full scope of this statutory mandate of the Act when approving draft regulations. I&E has provided revised draft regulations for the Commission’s consideration.

i. Municipal Requirements for Transparency to Promote Equity

Working group establishes a number of transparency requirements requiring host communities to publicize certain information on their website and in their offices. The requirements set expectations for detail (e.g., posting names, titles, email addresses of individuals involved with the local approval process), and provide that failure to comply with any one of those requirements (e.g., including situations where the town posts all required information but for an email address) shall result in a fine assessment.

Enforcement recommends that the regulations provide host communities with the opportunity to receive an initial notice of their misstep and an opportunity to cure, or correct, the issue, similar to the standard inspectional process. As written, the policy recommendation could be interpreted to call for an automatic fine assessment, regardless of the particular circumstances.

WG also provides that the Commission may publish on its website: (i) all submitted Community Impact Fee (“CIF”) calculations received from host communities; and (ii) all approved itemized statements of CIFs for each licensee operating within each host community.

Because the purpose of the policy is for host communities to adopt transparent equity policies, the burden of publicizing CIFs should remain with the host community, rather than being shifted to the Commission. Host communities are in the best position to know what should be publicized, in terms of the CIFs that are ultimately approved— whether on certification from the Commission or after a court ruling in a private cause of action.

Putting this responsibility on the Commission would require agency staff resources to upload all alleged CIFs and approved CIFs, before and after the dispute. It would also require multi-tiered tracking by staff, which would pose a significant administrative burden:

- i. Staff would need to track and upload undisputed CIFs that have been paid;
- ii. Staff would have to track and upload disputed CIFs that have been ordered as appropriately issued by a Commission Hearing Officer;
- iii. Staff would have to track and upload disputed CIFs that have been ordered as appropriately calculated and issued by a court;
- iv. CIF resolution will happen at different points in the process, which will complicate the need for tracking; and
- v. Agency staff will have to acquire and account for proof of CIF payments.

I&E recommends removing the WG statement of the Commission’s ability to publish certain information on its website from the regulations because it exceeds the scope of the Legislature’s mandate, making it an unnecessary change for purposes of the Commission’s obligation to promulgate regulations consistent with the Act on or before November 9, 2023.

j. Publication of Non-Compliant Host Communities

The WG has also proposed requiring the Commission to publicize a list of municipalities that have been reported to the Commission as violating regulatory requirements.

I&E advises against publishing a list of Host Communities that have been reported to violate the regulations. The agency should allow complaints to come in through the normal complaints process where they will be investigated by I&E staff. If the matter escalates to a referral to Enforcement Counsel staff, then fines may be assessed if appropriate. In other words, publication of “problem Host Communities” should only occur once the complaint has been substantiated, and fact finding and legal analysis has occurred, not sooner.

III. Potential
Impacts of the WG’s Proposed Policy Recommendations, if Adopted.

If the Commission adopts the WG’s policy recommendations as proposed, I&E have done a preliminary impact analysis. While there can be unanticipated impacts, the proposed policy recommendations appear to influence staffing, technology platforms, various policy documents,



development of standard operating procedures, and updates to necessary administrative documentation.

a. Staffing

The proposed policy recommendations are likely to impact the entire I&E team with heavier impacts on Licensing, Investigations/Compliance, and Enforcement Counsel (EC) staff.

Licensing will primarily be impacted by the creation, reviewing, and processing of SEB applications. Currently, Licensing does not review Social Equity eligibility-related applications. Assuming the need for Licensing to review SEB applications which will, at a minimum, require assessment of Social Equity requirements in addition to business organization requirements, hypothetically, it is projected that at least one (1) additional full-time employee will be needed.

During the last SEP cohort (June-November 2021), 956 new SEP applications for individuals were created. Licensing used the last cohort’s new application creation data points for a 6-month period, adjusted it for a full year open enrollment, predicted 33% submission rate based on individuals collaborating in a business structure together, and expanded out based on number and time of reviews. This model yielded the following:

	6/2021-11/2021 SE APPS	FULL YEAR ADJ	ORG ADJ. (33%)	# OF FIRST/ SUPP REVS	TTL REVS	LOW RANGE (HRS.)	HIGH RANGE (HRS.)	TOTAL LOW RANGE (HRS.)	TOTAL HIGH RANGE (HRS.)	LOW RANGE / FTE	HIGH RANGE / FTE
SOCIAL EQUITY BUSINESS APPS	956	1912	631	2	1262	1	2	1262	2524	0.69	1.37
TOTAL FTEs										0.69	1.37

The Investigations/Compliance team will be largely responsible for assessing relevant documentation, completing regulatory compliance inspections/audits targeting operational requirements, and reports pertaining to these new requirements. Considering that Investigations/Compliance team will handle the issuance of Notices of Deficiencies (“NOD”), review Plans of Correction (“POC”), and all the additional complaints generated from applicants/licensees/municipalities this would require more staff in order to assess these complaints, gather facts, conduct interviews, inspect and, when applicable, now conduct investigations in a prompt and timely manner. We would need to create a “Municipality Unit” within the Investigations/Compliance team to oversee the compliance aspects related to the requirement noted above.

Because the consequence for not following these requirements is the imposition of a fine, EC staff will be significantly affected. EC staff will be responsible for enforcing new regulatory requirements through initiation of a 30A action (i.e., fine assessments). The Commission would likely be required to afford host communities a hearing right to contest any fine issued by EC staff on behalf of I&E. If so, EC staff will see increased administrative litigation given the number of host communities that are now subject to these requirements and will likely challenge fine imposition.

EC staff anticipates an increase in requests for counsel and advice to assist I&E staff in their compliance monitoring of host communities, including issuance of NODs, Requests for Information (“RFI”), and review of POCs, and interpreting and applying new oversight authority and regulatory requirements relative to host communities. EC staff expects an increase in requests for legal assistance including but not limited to, assistance with guidance documents, notices, form updates, communications between I&E staff and host communities and/or municipal counsel, written correspondence to reinforce I&E staff’s authority in connection with investigations of host communities and potential issuance of administrative subpoenas.

EC staff further anticipates an increase in waiver requests submitted by host communities seeking exemption from Commission regulatory requirements. Because some Community Impact Fees (“CIF”) will not be determined by the agency, but rather, by a court, EC staff will have to track all litigation initiated in court to challenge CIFs.

EC staff estimated hours of time spent on simple and complex Counsel and Advice, Waivers, Suitability Actions, and Enforcement Actions with consideration to the number of legal matters referred in FY23. Initial calculation suggests the agency will need, at minimum, two additional Associate Enforcement Counsel FTEs. NOTE: Estimated hours relied on for this calculation are likely an undercount. Legal matters vary in terms of complexity and there is limited data on hours required to prepare for and litigate 30A cases at hearing or on judicial review.

b. MassCIP, Applications, & Other Related IT Updates

If the WG’s proposed policies and regulations are adopted by the Commission, I&E staff, along with IT and JD Software, will have a heavy volume (25) applications to create and program within MassCIP. A natural follow up after the applications are created will be an update and inclusion of this information within MS Dynamics. Additionally, the proposed policies will impact the volume and scope of additional data and data analysis.

c. Guidance Document and FAQ Updates

I&E staff will be required to review and make updates to various policy-related documents which include the following:



- i. Guidance for Municipalities
- ii. Guidance on Licensure
- iii. General FAQs
- iv. Applicant Forum FAQs
- v. Delivery FAQs
- vi. Research FAQs

d. Forms & Notices: Creation & Updates

Substantive updates to the following forms and notices that will require I&E Licensing staff input and review include the following:

- i. Creation of assessment and compliance requirements for SEB
- ii. License review checklist/RFI form
- iii. License renewal checklist/RFI form
- iv. Creation of SEB checklist/RFI form
- v. Update to municipal notices
- vi. Update to application complete notice
- vii. Update to all executive summary recommendation forms

e. Standard Operating Procedures: Creation & Updates

Currently finalized and pending SOPs will require updating based on new or amended processes stemming from these policies. Essentially, SOPs regarding the review of new license applications and SEB applications will require review and updating.

f. Customer Service & Delays

As with implementation and effectuation of prior regulatory rounds, the utilization of I&E's teams can become taxing. In an effort to accomplish specific deadlines associated with new policies, staff have been assigned non-regular duties. This can and will have an impact on the daily rhythm of the review of various applications and can lead to additional (now uncommon) delays.

The implementation and effectuation of new requirements as articulated above require a quick turn-around due to the mandates for municipalities to adopt Municipal Equities bylaws to a date not yet determined. In order to ensure equitable enforcement this would present significant challenges to the I&E's Investigations/Compliance team because it would impact scheduling of inspections, due diligence reviews for compliance related matters such as PPLIs, PFLIs, vehicles, structural changes, architectural reviews, alternative security provisions requests, packaging &



labeling preapprovals, expired product audits, product database audits, Metrc audits, tier relocations & tier expansions, change of ownerships, change of location inspections, investigative related work, and administrative related duties by maintaining records in the case management system, etc. Without adequate staffing this would impact when licensees can obtain their final licenses and it would hinder the team's ability to ensure ongoing regulatory compliance in order to meet the mission of the Commission. Additionally, this would negatively impact the team's ability to conduct inspections in a timely manner thus affecting the expedited applicants. In short, this would create a backlog.

Delays can further be anticipated to EC staff's ability to timely process waiver requests, suitability matters, enforcement actions, and counsel and advice matters. Given the expansion of oversight power and authority, and the need for extensive legal support navigating issues of first impression, EC staff functions may see a backlog on its processing, legal assistance, and advice functions without allocation of additional resources.

IV.

Conclusion & Opportunities for Further Development

I&E Leadership thinks there is additional opportunities for further development between I&E, the Communication and Social Equity teams, and other departments and teams to collaborate with each other regarding impact and implementation of the proposed policies and regulations.

I&E Leadership affirms its opinions stated within this memorandum as being valuable input for policymakers and the ED. We appreciate and thank the ED and PM for this opportunity to share our opinions and thoughts regarding this important matter.

V.

Appendix

A: Proposed Alternative Draft Regulations

500.181: Minimum Acceptable Equity Standards Governing Municipalities and Host Communities

- (1) This section is governed by M.G.L. c. 94G §§ 3 and 4, as amended by St. 2022, c. 180. Pursuant to M.G.L. c. 94G § 3, the Commission must establish minimum acceptable standards for Host Communities to promote and encourage full participation in the regulated Marijuana industry by people from communities that were disproportionately harmed by Marijuana prohibition and enforcement and to positively impact those communities.



- (2) M.G.L. c. 94G § 4(a)(xxxi)-(xxxii) empowers the Commission to establish procedures for municipalities to promote and encourage full participation in the regulated Marijuana industry during negotiations of HCAs with Social Equity Businesses and to develop minimum acceptable standards governing HCA negotiations with Social Equity Businesses. The Commission is further authorized to develop best practices for HCA negotiations between municipalities and License Applicants that have been designated as Social Equity Program Participants or Economic Empowerment Priority Applicants.
- (3) Equity Standards for Host Communities to Promote and Encourage Full Participation in the regulated Marijuana industry.
- a. A Host Community shall adopt the following transparent practices to promote and encourage full equity participation:
1. A Host Community shall publicize certain information in a conspicuous location at its offices and on its website which shall, at minimum, include:
 - a. All required steps of a Host Community’s local approval process, including, but not limited to, all associated fees, deadlines, and meeting schedules for local bodies involved in the local approval process;
 - b. Identification of key individuals involved in a Host Community’s local approval process, including, but not limited to, their name, title, business address, and business contact information such as email address or phone number;
 - c. A list of all documentation required by a Host Community’s local approval process, in downloadable form and paper form;
 - d. Identification of application criteria for local approval to operate a Marijuana Establishment and scoring methodologies relied on by a Host Community;
 - e. General scoring information for all applicants and a Host Community’s scoring of each individual applicant;
 - f. A Host Community’s explanation, in narrative form, of its reasoning for the approval or denial of an application; and
 - g. Any other information required by the Commission.
 2. A Host Community shall develop a plan to promote and encourage full participation in the regulated cannabis industry by individuals from communities disproportionately harmed by cannabis prohibition and enforcement and to positively impact those communities and shall publicize its equity plan in a conspicuous location at its offices and on its website. A Host Community’s equity plan shall:
 - a. Encourage applications from Social Equity Businesses that are operating in a Host Community or License Applicants that have been designated as Social Equity Program Participants or Economic Empowerment Priority Applicants and seek to operate in a Host Community; and
 - b. Include goals, programs, and measurements a Host Community will utilize to promote and encourage equity participation.
 3. A Host Community shall publish data regarding its total applicant pool, which

- shall identify each Social Equity Business and License Applicant that has been designated as a Social Equity Program Participant or Economic Empowerment Priority Applicant.
- b. A municipality or Host Community shall adhere to best practices for HCA negotiations with License Applicants that have been designated as Social Equity Program Participants or Economic Empowerment Priority Applicants including, but not limited to, the following:
 1. A Host Community shall develop a standard evaluation form that scores components of an application. The evaluation form shall include consideration of equity in the overall evaluation score, which must comprise not less than 25 percent of the total evaluation score. This equity component shall include: (i) whether the License Applicant is a Social Equity Program Participant; (ii) whether the License Applicant is an Economic Empowerment Priority Applicant; (iii) whether the License Applicant has a prior Marijuana-related criminal conviction; (iv) whether the License Applicant is part of an Area of Disproportionate Impact, as identified by the Commission; or (v) a majority of the License Applicant entity is comprised of individuals from Black, African American, Hispanic or Latino descent.
 2. In circumstances where a Host Community imposes a cap on the number of Marijuana Establishments or MTCs that may obtain local approval to operate, if a Host Community later decides to allow additional Marijuana Establishments or MTCs, at least 50 percent of those licenses, but no less than 1 license, above the previously-established cap shall be reserved for Social Equity Businesses or License Applicants that have been designated as Social Equity Participants or Economic Empowerment Priority Applicants.
 - c. Host Communities must adopt local rules or bylaws to comply with this section on or before May 1, 2024. A Host Community must submit an attestation in a form and manner determined by the Commission affirming that it has adopted local laws to effectuate compliance with this section and identifying the specific laws passed.
 - d. Any interested person may file a complaint with the Commission alleging noncompliance with an equity requirement under 935 CMR 500.181.
 1. If the Commission substantiates an allegation of noncompliance with 935 CMR 500.181, a Host Community shall be fined after first receiving notice and opportunity for corrective action pursuant to 935 CMR 500.310 and 935 CMR 500.320. A Host Community shall be fined in an amount equal to the annual total of CIFs received from all Marijuana Establishments and MTCs operating in the Host Community during the prior calendar year.
 - a. The Commission shall afford a Host Community a right to hearing pursuant to 935 CMR 500.500.
 - b. All fines collected shall be deposited into the Cannabis Social Equity Trust Fund established in section 14A of chapter 94G.
 - c. The Commission may publish a list of any municipality or Host Community that has been assessed a fine for equity noncompliance.
 - d. Fine assessments pursuant to this subsection shall take effect no sooner than May 1, 2025.

(4) Equity Standards for Host Communities during HCA Negotiations with Social Equity Businesses

- a. A Host Community shall prioritize negotiations of HCAs with equity parties. The equity party in a negotiation of an HCA for an application for licensure is a License Applicant that has been designated as a Social Equity Program Participant, an Economic Empowerment Priority Applicant, or both. The equity party in a negotiation of an HCA for an application for renewal of licensure is a Social Equity Business.
- b. A Host Community may waive or reduce fees for an equity party to an HCA negotiation, including, but not limited to CIFs, zoning and occupancy fees.
- c. Required practices. At minimum, a municipality or Host Community shall take the following actions during HCA negotiations with an equity party to promote and encourage their full participation:
 1. Engage in an ongoing dialogue by providing multiple opportunities for discussion and negotiation of HCA terms including, at minimum, two conferences with an equity party;
 2. Include any attorney, authorized representative, or other advocate, if chosen by an equity party, in all negotiation discussions and conferences;
 3. Promote language access by providing a certified interpreter or translator to assist an equity party who is a Non-English speaker during all negotiation discussions and conferences;
 4. Provide reasonable opportunities for an equity party to review a proposed HCA, HCA term or condition outside of a negotiation conference, or to seek review or input by a third party of their choice.
 5. Negotiate the terms of an HCA in good faith, including consideration of flexible terms that may mitigate particular challenges affecting an equity party, such as access to capital, with all terms and clauses conspicuously identified and openly discussed;
 6. Allow an equity party to propose an amendment to, or seek cancellation of, an HCA within thirty days from the date of execution of the HCA.
- d. Prohibited practices.
 1. No municipality or Host Community shall negotiate an HCA with an equity party through the use of undue influence, duress, coercion, intimidation, threats, or any strong-arm tactics.
 2. No municipality or Host Community shall threaten loss of an equity party's position in its local application queue or delay to the processing of an equity party's application.
 3. No municipality or Host Community shall compel an equity party to sign an HCA in any manner that conflicts with the practices required in 935 CMR 500.181(4)(b).

(5) Equity Standards for Positively Impacting Communities that were Disproportionately harmed by Marijuana Prohibition and Enforcement

- a. A Host Community shall donate, at minimum, 3% of each CIF it receives from a



- Licensee to the Cannabis Social Equity Trust Fund.
- b. Licensees may satisfy their positive impact plan requirement, in part, by donating to the Cannabis Social Equity Trust Fund:
 1. A Licensee must have authorization to commence operations to donate to the Cannabis Social Equity Trust Fund as part of their positive impact plan.

RELATED REGULATORY AMENDMENTS

500.002: Definitions

Social equity business means a Marijuana Establishment comprised of at least 51 percent (majority) ownership of individuals who are Social Equity Program Participants or who have been certified as meeting the Commission's criteria for designation as an Economic Empowerment Priority Applicant, or both.

500.101: Application Requirements

(1) New Applicants. An applicant in any category of Marijuana Establishment shall file, in a form and manner specified by the Commission, an application for licensure as a Marijuana Establishment. The application shall consist of three sections: Application of Intent; Background Check; and Management and Operations Profile, except as otherwise provided. The applicant may complete any section of the application in any order. Once all sections of the application have been completed, the application may be submitted. Application materials, including attachments, may be subject to release pursuant to the Public Records Law, M.G.L. c. 66, § 10 and M.G.L. c. 4, § 7, cl. 26.

(a) Application of Intent. An applicant for licensure as a Marijuana Establishment shall submit the following as part of the Application of Intent:

...
11. A plan by the Marijuana Establishment to positively impact Areas of Disproportionate Impact, as defined by the Commission, for the purposes established in M.G.L. c. 94G, § 4(a $\frac{1}{2}$)(iv). A Marijuana Establishment may satisfy this requirement, in part, by donating to the Cannabis Social Equity Trust Fund established pursuant to M.G.L. c. 94G, § 14A. The plan shall outline the goals, programs, and measurements the Marijuana Establishment will pursue once licensed;

(2) License Pre-certification Application Process for Economic Empowerment Priority Applicants and Social Equity Program Participants.



(a) License Applicants controlled by and with majority ownership comprised of Economic Empowerment Priority Applicants or Social Equity Program Participants may file a Pre-certification Application. The Pre-certification Application for licensure shall be in a form and manner specified by the Commission. After receiving pre-certification by the Commission pursuant to this subsection, a License Applicant may submit a Provisional License Application. After receiving a Provisional License, a License Applicant shall comply with the requirements of 935 CMR 500.103.

(b) Pre-certification Application. The Pre-certification Application shall consist of three sections: (i) Application of Intent; (ii) Suitability Pre-Screening; and (iii) a Management and Operations Profile.

1. A License Applicant may complete any section of the application in any order. Once all sections of the application have been completed, the application may be submitted.

2. The Commission may determine a License Applicant to be pre-certified upon finding a License Applicant has submitted responsive documentation demonstrating a propensity to successfully operate under a Marijuana Establishment license.

3. On approval of the Pre-certification Application, a License Applicant shall be given a dated notice of such approval along with a copy of the Pre-certification Application to the extent permitted by law.

4. Application materials, including attachments, may be subject to release pursuant to the Public Records Law, M.G.L. c. 66, § 10 and c. 4, § 7, cl. 26.

(c) Application of Intent. An applicant for pre-certification under this section shall submit the following as part of the Application of Intent:

1. Documentation that the Marijuana Establishment is an entity registered to do business in Massachusetts and a list of all Persons or Entities Having Direct or Indirect Control;

2. A disclosure of an interest of each individual named in the application in any Marijuana Establishment for licensure in Massachusetts;

3. Documentation disclosing whether any individual named in the application have past or present business interests in Other Jurisdictions;

4. The requisite nonrefundable application fee pursuant to 935 CMR 500.005; and

5. Any other information required by the Commission.

(d) Suitability Pre-Screening. Each License Applicant for pre-certification shall submit to a suitability pre-screening in a form and manner determined by the Commission.

(e) Management and Operations Profile. Each applicant for precertification shall submit, with respect to each application, a response in a form and manner specified by the Commission, which includes:

1. A description of the Marijuana Establishment's plan to obtain a liability insurance policy or otherwise meet the requirements of 935 CMR 500.105(10);

2. A detailed summary of the business plan for the Marijuana Establishment;

3. A detailed summary of operating policies and procedures for the Marijuana

Establishment which shall include, but not be limited to, provisions for:

- a. Security
- b. Prevention of diversion;
- d. Storage of Marijuana
- e. Transportation of Marijuana;
- f. Inventory procedures
- g. Procedures for quality control and testing
- h. Personnel policies;
- i. Dispensing procedures,
- l. Recordkeeping procedures;
- m. Maintenance of financial records;
- o. A detailed description of qualifications and intended training(s) for Marijuana Establishment Agents who will be employees;

4. The Management and Operation Profile submitted in accordance with 935 CMR 500.101(1)(c) shall demonstrate compliance with the operational requirements set forth by incorporation in 935 CMR 500.105 through 500.145 as applicable;

5. Disclosure of the proposed hours of operation, and the names and contact information for individuals that will be the emergency contacts for the Marijuana Establishment; and

6. Any other information required by the Commission.

(f) Provisional License Application. The provisional license application shall consist of the three sections of the application, the Application of Intent, Suitability Pre-screening, and Management and Operations Profile.

1. An applicant may submit a provisional license application within 24 months of the date of the applicant's pre-certification approval pursuant to 935 CMR 500.101(2)(b)3.

2. If there has been a material change of circumstances after the submission of these sections as part of the Pre-certification Application, the applicant shall revise this information and attest in a form and manner determined by the Commission.

3. The applicant may submit any section of the application in any order. Once all sections of the application have been completed, the application may be submitted.

4. Once all sections of the application have been completed, the application may be submitted for review.

5. Once the Provisional License application has been submitted, it will be reviewed in the order it was received pursuant to 935 CMR 500.102(2).

6. The Pre-certification and Provisional License application combined will be reviewed in accordance with 935 CMR 500.102(1).

7. Application materials, including attachments, may be subject to release pursuant to the Public Records Law, M.G.L. c. 66, § 10 and c. 4, § 7, cl. 26.

(g) Application of Intent. An applicant for licensure under this section shall submit the following as part of the Application of Intent:

1. A list of all Persons or Entities Having Direct or Indirect Control currently associated with the proposed establishment. In addition, the applicant shall submit any contractual, management, or other written document that explicitly or implicitly conveys direct or indirect control over the Marijuana Establishment to the listed person or entity pursuant to 935 CMR 500.050(1)(b);
2. A disclosure of an interest of each individual named in the application in any Marijuana Establishment or MTC application for in Massachusetts;
3. Documentation disclosing whether any individual named in the application have past or present business interests in Other Jurisdictions;
4. Documentation of a bond or an escrow account in an amount set by 935 CMR 500.105(16): *Bond*;
5. Identification of the proposed address for the license;
6. Documentation of a property interest in the proposed address. The proposed Marijuana Establishment shall be identified in the documentation as the entity that has the property interest. Interest may be demonstrated by one of the following:
 - a. Clear legal title to the proposed site;
 - b. An option to purchase the proposed site
 - c. A legally enforceable agreement to give such title; or
 - d. Documentation from the Owner evidencing permission to use the Premises.
7. Disclosure and documentation detailing the amounts and sources of capital resources available to the applicant from any individual or entity that will be contributing capital resources to the applicant for purposes of establishing or operating the identified Marijuana Establishment for each license applied for. If any person or entity contributing initial capital, either in cash or in kind, would be classified as a Person or Entity Having Direct or Indirect Control, in exchange for the initial capital, they shall also be listed pursuant to 935 CMR 500.101(1)(a)1. Information submitted shall be subject to review and verification by the Commission as a component of the application process. Required documentation shall include:
 - a. The proper name of any individual or registered business name of any entity;
 - b. The street address; provided, however that the address may not be a post office box;
 - c. The primary telephone number;
 - d. Electronic mail;
 - e. The amount and source of capital provided or promised;
 - f. A bank record dated within 60 days of the application submission date verifying the existence of capital;
 - g. Certification that funds used to invest in or finance the Marijuana Establishment were lawfully earned or obtained; and
 - h. Any contractual or written agreement pertaining to a loan of initial capital, if applicable.

8. Documentation that the applicant has conducted a community outreach meeting consistent with the Commission's Guidance for License Applicants on Community Outreach within the six months prior to the application.

Documentation shall include:

- a. Copy of a notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, that was published in a newspaper of general circulation in the city or town at least 14 calendar days prior to the meeting;
- b. Copy of the meeting notice filed with the city or town clerk;

9. Attestation that notice of the time, place and subject matter of the meeting, including the proposed address of the Marijuana Establishment, was mailed at least seven calendar days prior to the community outreach meeting to abutters of the proposed address of the Marijuana Establishment, and residents within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such Owner is located in another city or town;

a. Information presented at the community outreach meeting, which shall include, but not be limited to:

- i. The type(s) of marijuana establishment to be located at the proposed address;
- ii. Information adequate to demonstrate that the location will be maintained securely;
- iii. Steps to be taken by the marijuana establishment to prevent diversion to minors;
- iv. A plan by the marijuana establishment to positively impact the community;
- v. Information adequate to demonstrate that the location will not constitute a nuisance as defined by law; and
- vi. An attestation that community members were permitted to ask questions and receive answers from representatives of the marijuana establishment.

b. Documentation in the form of a single-page certification signed by the contracting authorities for the municipality and applicant evidencing that the applicant for licensure and host municipality in which the establishment is located executed a host community agreement. In addition to this requirement, the host community shall state that they have accepted the Social Consumption Establishment applicant's plans to:

- i. Mitigate noise;
- ii. Mitigate odor; and
- iii. Comply with outdoor smoking laws, ordinances, or bylaws.

c. A description of plans to ensure that the marijuana establishment is or will be compliant with local codes, ordinances, and bylaws for the physical address of the marijuana establishment, which shall include, but not be limited to, the identification of any local licensing requirements for social consumption of the adult use of marijuana;

- d. A plan by the marijuana establishment to positively impact areas of disproportionate impact, as defined by the Commission, for the purposes established in M.G.L. c. 94G, § 4(a½)(iv). The plan shall outline the goals, programs, and measurements the marijuana establishment will pursue once licensed; and
 - e. Any other information required by the Commission.
- (h) Each License Applicant for pre-certification shall submit to a suitability pre-screening in a form and manner determined by the Commission.
- (i) Management and Operations Profile. Each applicant for licensure shall submit, with respect to each application, a response in a form and manner specified by the Commission, which includes:
- 1. Detailed information regarding its business registration with the Commonwealth, including the legal name, a copy of the articles of organization and bylaws as well as the identification of any doing-business-as names;
 - 2. A certificate of good standing, issued within the previous 90 days from submission of an application, from the Corporations Division of the Secretary of the Commonwealth;
 - 3. A certificate of good standing or certificate of tax compliance issued within the previous 90 days from submission of an application, from the DOR;
 - 4. A certificate of good standing, issued within the previous 90 days from submission of an application, from the DUA, if applicable. If not applicable, a written statement to this effect is required;
 - 5. A proposed timeline for achieving operation of the Marijuana Establishment and evidence that the Marijuana Establishment will be ready to operate within the proposed timeline after notification by the Commission that the applicant qualifies for licensure;
 - 6. A diversity plan 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. The plan shall outline the goals, programs, and measurements the Marijuana Establishment will pursue once licensed.
- (j) The Executive Director of the Commission may approve, provided the Executive Director gives the Commission timely notice of his decision:
- 1. Applications for Delivery Pre-Certification;
 - 2. Applications and authorization to commence operations for Delivery Endorsements pursuant to 935 CMR 500.050(5) for licensed Marijuana Microbusinesses that have complied with Commission requirements pertaining to delivery operations.

500.102: Action on Applications

(1) Action on Each Application. The Commission shall grant licenses with the goal of ensuring that the needs of the Commonwealth are met regarding access, quality, and community safety.



...

(d) On determination that the application is complete, a copy of the completed application, to the extent permitted by law, will be forwarded to the municipality in which the Marijuana Establishment will be located. The Commission shall request that the municipality respond within 30 days of the date of the correspondence that the applicant's proposed Marijuana Establishment complies with municipal bylaws or ordinances.

1. If a Host Community does not respond to the Commission's correspondence within 30 days, the Commission will consider the requirement to be satisfied without any further action by the Host Community or applicant.

Catahoula Cannabis LLC 0241-COO-03-0823

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Catahoula Cannabis LLC

License Number	License Type
MR284693	Retailer

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
Kaushikkumar Patel	Person with Direct or Indirect Control

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

Entity	Role
Shiva Wellness LLC	Entity with Direct or Indirect Control

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

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

7. 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.

Hudson Growers Alliance, LLC
0248-COO-01-0923

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Hudson Growers Alliance, LLC

License Number	License Type
MC282581	Cultivator

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
John Brian Adams	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.

MedMen Boston, LLC
0243-COO-03-0823

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

MedMen Boston, LLC

License Number	License Type
MR282091	Retail

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
Matthew Richman	Person with Direct or Indirect Control
Anthony Banks	Person with Direct or Indirect Control
Paul Hearn	Person with Direct or Indirect Control

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

Entity	Role
BeWell Organic Medicine, Inc.	Entity with Direct or Indirect Control

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

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

7. 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.

**Munro Associates, LLC d/b/a The Vault
0244-COO-02-0923**

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Munro Associates, LLC d/b/a The Vault

License Number	License Type
MR282814	Retail
MR282527	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
The Vault Employee Stock Ownership Trust	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.

Theory Wellness, Inc.
0246-COO-02-0923

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Theory Wellness, Inc.

License Number	License Type
MC281524	Cultivator
MP281424	Product Manufacturer
MR281549	Retail
MR284150	Retail
MR281835	Retail
MTC1567	Medical Marijuana Treatment Center
MTC305	Medical Marijuana Treatment Center
MTC525	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 Entities Having Direct or Indirect Control:

Entity	Role
Theory Wellness Inc. Employee Stock Ownership Trust	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.

Twisted Growers LLC
0235-COO-01-0623

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Twisted Growers LLC

License Number	License Type
MC281714	Cultivator
MP281909	Product Manufacturer

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
Dominick DeMartino	Person with Direct or Indirect Control
Vincent DeMartino	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.

Webber Road Ops, LLC D/B/A Pioneer Cannabis Company 0243-COO-01-0823

CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Webber Road Ops, LLC D/B/A Pioneer Cannabis Company

License Number	License Type
MR283559	Retailer

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
Maura Doyle	Person Having 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.

Marijuana Establishment Renewals Executive Summary

Commission Meeting: November 9, 2023

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	4bros Inc	MR281550	MRR206662	Holyoke	\$0.00
2	617 Therapeutic Health Care, Inc.	MR283963	MRR206639	Boston	\$0.00
3	617 Therapeutic Health Center, Inc.	MC282414	MCR140620	Millis	\$0.00
4	ACMJ, Inc.	MC283322	MCR140556	Holyoke	\$0.00
5	Advanced Cultivators, LLC	MC283314	MCR140593	Lowell	\$0.00
6	Ashli's Extracts, Inc.	MP281374	MPR244053	Attleboro	\$0.00
7	Ashli's Farm, Inc.	MC281451	MCR140576	Attleboro	\$0.00
8	Ashli's, Inc.	MR281332	MRR206592	Attleboro	\$0.00
9	B.O.T Realty, LLC	MR283113	MRR206631	Fitchburg	\$0.00
10	Cannabis of Worcester LLC	MR284603	MRR206638	Worcester	\$0.00
11	Caroline's Cannabis, LLC	MR283694	MRR206650	Hopedale	\$0.00
12	Coastal Cultivars, Inc.	MP281764	MPR243909	Wareham	\$0.00
13	Cosmopolitan Dispensary, Inc.	MR282961	MRR206604	Fall River	\$0.00
14	Curaleaf Massachusetts, Inc.	MP281318	MPR244050	Webster	\$0.00
15	Curaleaf Massachusetts, Inc.	MC281309	MCR140575	Webster	\$0.00
16	Curaleaf North Shore, Inc.	MP281300	MPR244049	Amesbury	\$0.00
17	Curaleaf North Shore, Inc.	MC281255	MCR140565	Amesbury	\$0.00
18	Curaleaf Processing, Inc.	RE281303	RER234149	Newton	\$0.00
19	Delivered Inc	MD1303	MDR272555	Holyoke	\$0.00
20	Dris Corporation	MP282090	MPR244081	Leicester	\$0.00
21	Dris Corporation	MX281395	MXR126669	Bellingham	\$0.00
22	Emerald Grove, Inc.	MP281770	MPR244060	Middleborough	\$0.00
23	Emerald Grove, Inc.	MC282426	MCR140590	Middleborough	\$0.00



24	Evergreen Strategies, LLC.	MR283100	MRR206663	Belchertown	\$0.00
25	Four Daughters Compassionate Care, Inc.	MR281552	MRR206627	Sharon	\$0.00
26	Four Daughters Compassionate Care, Inc.	MP281715	MPR244071	Sharon	\$0.00
27	Four Daughters Compassionate Care, Inc.	MC282243	MCR140592	Sharon	\$0.00
28	Good Chemistry of Mass	MR281702	MRR206656	Worcester	\$0.00
29	Good Chemistry of Massachusetts, Inc.	MC281557	MCR140605	Bellingham	\$0.00
30	Grassp Ventures LLC	MD1262	MDR272554	Salem	\$0.00
31	Haverhill Stem LLC	MR281327	MRR206643	Haverhill	\$0.00
32	Impressed LLC	MC282148	MCR140603	Hanson	\$0.00
33	Jolly Green Inc	MC283508	MCR140604	Gardner	\$0.00
34	Lifted Genetics, LLC	MC282183	MCR140601	Hopedale	\$0.00
35	Littleton Apothecary LLC	MR283727	MRR206647	Littleton	\$0.00
36	M3 Ventures, Inc.	MR281290	MRR206620	Plymouth	\$0.00
37	M3 Ventures, Inc.	MP281346	MPR244066	Plymouth	\$0.00
38	M3 Ventures, Inc.	MC281446	MCR140582	Plymouth	\$0.00
39	Mainely Productions LLC	MC281899	MCR140606	Uxbridge	\$0.00
40	Mass Greenwoods LLC	MR284644	MRR206635	Boston	\$0.00
41	Massachusetts Green Retail, Inc.	MR284144	MRR206659	Lynn	\$0.00
42	MINUTEMAN FARM, LLC	MC282504	MCR140586	Ashby	\$0.00
43	NAKED NATURE, LLC	MB282221	MBR169314	Clinton	\$0.00
44	Neamat, LLC	MP282004	MPR244073	Uxbridge	\$0.00
45	New Green LLC	MR282969	MRR206648	Egremont	\$250.00
46	Nova Farms, LLC	MP281325	MPR244075	Attleboro	\$0.00
47	Patient Centric of Martha's Vineyard, Ltd.	MR283035	MRR206634	Tisbury	\$0.00
48	Potency LLC	MR281594	MRR206652	Pittsfield	\$0.00
49	PR MA LLC	MR282631	MRR206618	North Attleborough	\$0.00
50	ProVerde Laboratories, Inc.	IL281279	ILR267929	Milford	\$0.00
51	Pure Oasis LLC	MR281352	MRR206596	Boston	\$0.00
52	RC Retail Amherst LLC	MR282975	MRR206612	Amherst	\$0.00
53	Resinate, Inc.	MC281259	MCR140583	Douglas	\$0.00
54	Rolling Releaf LLC	MD1265	MDR272558	Newton	\$0.00
55	Sanctuary Medicinals, Inc.	MR281650	MRR206664	Gardner	\$0.00
56	Smokey Leaf	MR284276	MRR206655	Greenfield	\$0.00
57	SOCIAL- J LLC	DO100155	DOR5182958	Northampton	\$0.00
58	Sparkboro Wellness NAMA Corp.	MR283321	MRR206646	North Adams	\$0.00
59	Sun Drops, LLC	MP282053	MPR244061	Sheffield	\$0.00
60	SunnyDayz Inc.	MR284636	MRR206625	Deerfield	\$0.00
61	Temescal Wellness of Massachusetts,	MP281402	MPR244074	Worcester	\$0.00

	LLC				
62	Temescal Wellness of Massachusetts, LLC	MC281550	MCR140597	North Adams	\$0.00
63	Terpene Journey, LLC	MR281612	MRR206645	Swampscott	\$0.00
64	The Blue Jay Botanicals, Inc.	MR282243	MRR206658	Athol	\$0.00
65	The Haven Center, Inc.	MR281258	MRR206537	Provincetown	\$0.00
66	The Haven Center, Inc.	MR282481	MRR206536	Brewster	\$0.00
67	The Haven Center, Inc.	MP281639	MPR244022	Wareham	\$0.00
68	The Haven Center, Inc.	MC282072	MCR140540	Wareham	\$0.00
69	The Haven Center, Inc.	MR282581	MRR206485	Fall River	\$0.00
70	The Healing Center LLC	MR283193	MRR206579	Fitchburg	\$0.00
71	Tree Market Lynn LLC	MR282587	MRR206669	Lynn	\$0.00
72	Tree Market Taunton LLC	MR281597	MRR206668	Taunton	\$0.00
73	UC Retail, LLC	MR284616	MRR206651	Groton	\$0.00
74	Volcann LLC	MR282925	MRR206642	Southampton	\$0.00
75	Wellman Farm, Inc.	MP281317	MPR244031	Lowell	\$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 9, 2023

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)
76	4bros, Inc.	RMD1325	Holyoke	Holyoke
77	ACK Natural, LLC	RMD1627	Nantucket	Nantucket
78	Alternative Therapies Group, Inc.	RMD1530	Salisbury	Amesbury
79	ARL Healthcare, Inc.	RMD1085	New Bedford	Middleborough
80	ARL Healthcare, Inc.	RMD225	Quincy	Quincy
81	Central Ave Compassionate Care, Inc.	RMD145	Ayer	Ayer
82	Coastal Healing, Inc.	RMD1529	Westport	Westport
83	Cresco HHH, LLC	RMD686	Fall River	Fall River
84	Cultivate Leicester, Inc.	RMD485	Leicester	Leicester
85	Good Chemistry of Massachusetts, Inc.	RMD3061	Holliston	Worcester
86	Holistic Industries, Inc.	RMD685	Monson	Somerville
87	HVV Massachusetts, Inc.	RMD1185	Gloucester	Gloucester
88	HVV Massachusetts, Inc.	RMD1405	Gloucester	Boston
89	Jushi MA, Inc.	RMD1285	Lakeville	Millbury
90	Patriot Care Corp.	RMD727	Lowell	Greenfield
91	Patriot Care Corp.	RMD265	Lowell	Boston
92	Revolutionary Clinics II, Inc.	RMD925	Fitchburg	Cambridge
93	Revolutionary Clinics II, Inc.	RMD1346	Fitchburg	Cambridge
94	Sanctuary Medicinals, Inc.	RMD605	Littleton	Gardner
95	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.

Gan Or, LLC

MP282097

MD1292

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Gan Or, LLC
60 Damon Rd., Northampton, MA 01060

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

Product Manufacturing
Marijuana Delivery Operator

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

Type	Status	Location
Cultivation, Tier 1/Indoor (up to 5,000 sq. ft.)	Provisional License	Northampton

Please note that individuals and/or entities associated with the proposed application(s) are also associated with a marijuana delivery pre-certification under the name of TZ Delivery, LLC

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on January 20, 2022 for its product manufacturing operations and March 10, 2022 for its marijuana delivery operations.
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 3, 2023.
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. 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.

- d. 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.

The licensee will not be performing transportation activities at this time for its product manufacturing operations.

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 may acquire, possess, and warehouse marijuana products but shall not sell or delivery marijuana products to consumers, until upon inspection, receiving permission from the Commission to commence full operations).
3. The licensee is subject to inspection to ascertain compliance with Commission regulations.
4. The licensee remains suitable for licensure.
5. The licensee shall cooperate with and provide information to Commission staff.
6. 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.

Northampton Labs

IL281313

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Northampton Labs
d/b/a Cambium Analytica
320 Riverside Dr., Building 7, First Floor, Northampton, MA 01062

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

Independent Testing Laboratory

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 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 12, 2023.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as



applicable.

10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

a. Security

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

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

b. Inventory and Storage

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

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

c. Transportation

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 obtain, possess, and test marijuana and marijuana products for the purpose of ensuring compliance with the Commission's testing protocols. The licensee shall not test marijuana or marijuana products for Marijuana Establishments or Medical Marijuana Treatment Centers for the purposes of establishing usable test results for the sale of any marijuana or marijuana product, until upon inspection, demonstrating to Commission staff full compliance with testing protocols and 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.



Nuestra, LLC
MR281469

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Nuestra, LLC
d/b/a The Boston Garden
200 Monsignor O'Brien Highway, Cambridge, MA 02141

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	Newton

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use retail licenses and a marijuana courier license under the name of The Blue Jay Botanicals, Inc.

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on March 11, 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 18, 2023.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.
10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state laws and local bylaws or ordinances.
11. Specific information from Commission staff's inspection is highlighted below:

a. Security

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

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

b. Inventory and Storage

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

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

c. Retail Operation

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

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

d. Transportation

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

RECOMMENDATION



Commission staff recommend final licensure with the following conditions:

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

Pluto Cannabis Co.

MR284913

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Pluto Cannabis Co.
193-195 Oxford St., Lynn, MA 01901

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 September 14, 2023.
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, 2023.
9. The licensee's facility was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.



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

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

a. Security

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

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

b. Inventory and Storage

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

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

c. Retail Operation

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

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

d. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

1. The licensee may possess and otherwise acquire marijuana, but shall not dispense, sell, or otherwise transport marijuana to other Marijuana Establishments, or to consumers, until upon inspection, receiving permission from the Commission to commence full operations.



2. The licensee is subject to inspection to ascertain compliance with Commission regulations.
3. The licensee remains suitable for licensure.
4. The licensee shall cooperate with and provide information to Commission staff.
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.

Rhythm of Life, LLC

MC283475

MP282066

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Rhythm of Life
217 River Road, Uxbridge, MA 01569

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

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

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

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 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): September 27, 2023.



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

a. Security

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

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

b. Inventory and Storage

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

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

c. Cultivation Operation

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

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

d. Product Manufacturing Operation

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

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



e. Transportation

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

RECOMMENDATION

Commission staff recommend final licensure with the following conditions:

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

Seaside Joint Ventures, Inc.

MR284549

ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Seaside Joint Ventures, Inc.
d/b/a Seaside Cannabis Company
14 Lots Hollow, Orleans, MA 02537

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 retail licenses under the name of Holistic Health Group, Inc.

LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on October 13, 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 20,



2023.

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

a. Security

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

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

b. Inventory and Storage

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

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

c. Retail Operation

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

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

d. Transportation

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

RECOMMENDATION



Commission staff recommend final licensure with the following conditions:

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



Finest Trees, LLC
DOA100163

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Finest Trees, LLC
34-36 Harrington Avenue, Shrewsbury, MA 01545

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
Marijuana Delivery Operator	Pre-Certification	N/A

4. The applicant was pre-certified by the Commission for Marijuana Courier on January 3, 2022. 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
Daniel Yarnie	Person Having Direct/Indirect Control
Rebecca Yarnie	Person Having Direct/Indirect Control

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)
(Daniel Yarnie / 51% ownership / SE305165)

8. The applicant and municipality executed a Host Community Agreement on December 20, 2022.
9. The applicant conducted a community outreach meeting on December 8, 2022 and provided documentation demonstrating compliance with Commission regulations.
10. The Commission received a municipal response from the City/Town of Shrewsbury on October 23, 2023 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	Hold and/or participate no less than bi-annually (two times a year) in clothing, food, or supplies drives geared towards populations and communities within the above-referenced census tracts in the City of Worcester.
2	Make annual monetary donations to Genesis Club, which is an organization based in Worcester that provides its members with access to meaningful employment, healthy lifestyles, safe housing, and education and helps them find genuine belonging, friendships, and purpose.

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 five (5) 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 8:00 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 and retain and diverse and inclusive group of employees which includes, but is not limited to, women (40%), minorities (20%), veterans (5%), persons with disabilities (5%); and LGBTQ+ people (5%) for its hiring initiatives.
2	Contract with women-owned (10%), minority-owned (10%), veteran-owned (5%), persons with disabilities-owned (5%), LGBTQ+-owned (5%) business enterprises for the purchase of marijuana product for delivery.

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.



Porter Square Remedies, LLC

MRN284796

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Porter Square Remedies, LLC
d/b/a TRUTH
1908 Massachusetts Avenue, Cambridge, MA 02140

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

Retail

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

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

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

Please note that individuals and/or entities associated with the proposed license are also associated with other adult-use retail licenses under the name of Union Leaf, Inc.

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

Individual	Role
Laxmi Pradhan	Person Having Direct/Indirect Control / Capital Contributor

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

Entity	Role
Cambridge Gardens, LLC	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 April 5, 2022.
8. The applicant conducted a community outreach meeting on November 3, 2022 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the City/Town of Cambridge on September 7, 2023 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	Donate \$1,500 to the Greater Boston Legal Services, an organization that provides services around CORI sealing and re-entry for previously incarcerated individuals.

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 five (5) 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	10:00 a.m. to 11:00 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 women (65%), minorities (35%), individuals who identify as LGBTQ+ (10%), veterans (5%), persons with disabilities (5%) for its hiring initiatives.



2	Provide training on cultural sensitivity and recognizing unconscious bias upon hire and at least once per year.
3	Provide bi-weekly one-on-one mentorship meetings between Director of Operations and employees who are women, minorities, individuals who identify as LGBTQ+, veterans, and persons with disabilities.

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 Stories Company Whitman, LLC
MRN284846

APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

The Stories Company Whitman, LLC
d/b/a Buddies Cannabis Dispensary
769 Bedford Street, Whitman, MA 02382

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

Retail

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

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

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

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

Individual	Role
Kaushikkumar Patel	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:

Expedited Applicant (Minority-Owned Business)

7. The applicant and municipality executed a Host Community Agreement on January 10, 2023.



8. The applicant conducted a community outreach meeting on January 6, 2023 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the City/Town of Whitman on September 28, 2023 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 10% of individuals who are Massachusetts residents of Abington and Brockton.
2	Provide an annual donation of \$2,500.00 to Whitman Hanson WILL.

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 ten (10) 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	10:00 a.m. to 9:00 p.m.
Friday-Saturday	9:00 a.m. to 10:00 p.m.
Sunday	10:00 a.m. to 6:00 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 a staff comprised of women (50%), minorities (20%), veterans (10%), people with disabilities (10%), individuals who identify as LGBTQ+ (20%) for its



	hiring initiatives.
2	Prioritize contracting with 10% of cannabis and non-cannabis vendors who are woman-owned, minority-owned, veteran-owned, people with disabilities-owned, and individuals who identify as LGBTQ+-owned businesses.

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

The applicant plans to obtain marijuana from its affiliated licenses. If the need arises, the applicant will obtain marijuana or marijuana products by contracting with other licensed establishments.

RECOMMENDATION

Commission staff recommend provisional licensure with the following conditions:

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



C1 Compliance Group

RVN454102

RESPONSIBLE VENDOR TRAINING (“RVT”) APPLICANT SUMMARY

1. Name, address, and contact information of the proposed RVT applicant:

Item	Information
RVT Applicant Name	C1 Compliance Group
RVT Applicant d/b/a Name	N/A
RVT Address	11 Long Meadow Road, Commack, NY 11725
RVT Business Phone Number	310-595-6827
RVT Business Email Address	jkeyes@theintegritusgroup.com
RVT Business Website	https://c1compliance.com/

2. The RVT applicant has applied to provide a training program for the Basic Core Curriculum.
3. No owner, manager, or employee of the RVT applicant is a Person or Entity Having Direct or Indirect Control of a Marijuana Establishment or Medical Marijuana Treatment Center. The following is a list of all required individuals disclosed:

Individual	Role
James Keyes	Owner, Controlling Person or Employee
Tina Murphy	Owner, Controlling Person or Employee
Mathew Murphy	Owner, Controlling Person or Employee

GENERAL OVERVIEW OF TRAINING PROGRAM

4. The RVT applicant’s program will be presented in a both in-person and virtual model.
5. The RVT applicant has demonstrated the following:
 - a. To verify the identification and certify completion of the training program for each agent;
 - b. To track trainees' time needed to complete the course training;
 - c. To allow for the trainees to ask questions of the RVT; and
 - d. To evaluate each trainee's proficiency with course material.
6. The RVT applicant described its plan to maintain its training records at its principal place of business including length of time for retention.



7. The RVT applicant outlined the attendees its training program intends to target, its recruitment approach, and the objectives of its training program.

COURSE MATERIALS AND ATTACHMENTS

8. The RVT applicant submitted following required training and evaluation materials:

1. Marijuana's Effect on the Human Body
2. Diversion Prevention and Prevention of Sales to Minors
3. Compliance with all Tracking Requirements
4. Key State Laws & Rules
5. Testing Materials
6. Evaluation Materials

RECOMMENDATION

Commission staff recommends the RVT applicant listed above be approved for a two-year certification to provide its training program with the following conditions:

1. The RVT applicant shall ensure all training materials reflect current Commission regulations.
2. The RVT applicant shall remain fully compliant with all applicable Commission regulations.

This recommendation is based on the review and evaluations of required materials and information submitted to the Commission.



DEI AND EMPLOYEE RELATIONS DIRECTOR
OUR COMMITMENT TO DIVERSITY
DRAFT

Department: Human Resources

Reports To: Chief People Officer

Job Title: Diversity, Equity, Inclusion/Employee
Relations Director

FLSA: Exempt

PURPOSE

Reporting to, and working closely with the Chief People Officer, the Director of Diversity, Equity, and Inclusion (DEI)/Employee Relations (EE), will be responsible for leading efforts to ensure the Agency's commitment to Diversity, Equity, Inclusion, as well as Belonging and Validation, is reflected in its activities, policies, practices, recruitment, promotion, and woven into every aspect of the Commission's operations and cultural goals and objectives. The DEI/EE REL Director will partner with the Director of (Community Engagement) Equity and Accessibility to ensure the Commission's commitment to DEI also aligns with its community outreach.

The DEI/EE Relations Director will work closely with members of the leadership team and Human Resources to lead the Commission's internal DEI strategy, as well as work with and serve as a department leader in DEI initiatives across the Commission.

ESSENTIAL FUNCTIONSS:

- Assist with the creation and implementation of the Agencies DEI strategic plan.
- Collaborate with departments and executive leadership across the Agency; including, but not limited to, the office of the Executive Director, Communications, Operations, Investigations and Enforcement, and Human Resources, to align best practices and equal and fair application of policies that build a sustainable internal and external DEI culture.
- Develop an environment that will support and ensure that the Agency provides a workplace environment that is welcoming, supportive, and inclusive for all staff, and a culture that reflects DEI best practices.
- Lead department wide training and ongoing education relative to Diversity, Equity, Inclusion, Belonging and Validation.
- Review department policies with a DEI lens and update or revise as needed.
- The DEI/EE REL Director will plan and manage the implementation of educational seminars, workshops and trainings on inclusion, diversity, equity and access programs, seminars, workshops, and conferences for staff for the purpose of building and sustaining an inclusive Commission culture.

- Develop, implement, and execute on communicating the value of DEI to Agency staff and Leadership Team.
- Work with the offices of the Executive Director and Commissioners to ensure and support their work by incorporating the Commission's DEI values and principles.
- Develop metrics for measuring individual department performance on DEI and key performance indicators; oversee metrics collection; evaluate results quarterly; and plan for intervention and corrective measures where necessary.
- Educate, partner, consult, collaborate, and advise on emerging DEI best practices and opportunities to effectively build, incorporate, and manage Agency-wide DEI and Employee Relations initiatives.
- Advise and support the Commission's DEI Steering Committee, Equity and Access Working Group, and Commission Voices Committee.
- Ensures that all employee relations activities are reflective of the Commission's deep commitment to DEI across the Agency as well as in its services to the communities it serves.
- Creating a diverse and culturally responsive workforce.
- Developing diversity, equity, and inclusion (DEI) policies and practices.
- This position works in conjunction with the Commission's HR Director to examine and improve current hiring practices.
- To identify and replicate practices that promote diversity, equity, and inclusion by supporting the development and implementation of an Equitable Hiring policy.
- Oversee the development and application of practices that support teams in designing policies and programs that intentionally promote racial equity, eliminate bias, and foster a culture of respect for diverse voices and perspectives.
- Serve as a member of the Commission Voices Committee and the Equity and Access Working Group.
- Perform other duties as assigned.

Qualifications and Characteristics

- Bachelor's degree in HR Management or Business, Master's preferred; relevant certification in DEI preferred.
- 2 to 5 years experience in facilitating DEI programs in small to medium sized organizations.
- Experience working in government and/or non-profit organizations with complex cultural systems preferred.
- Excellent interpersonal communication skills, engaging presentation style, and relationship management skills.
- Ability to collaborate with diverse racial, religious, cultural; linguistic, and LGBTQ Plus employee populations and communities.
- Proven ability to collaborate with colleagues across all levels of the Commission.

- A genuine, approachable, and supportive style that projects and encourages a high degree of comfort and trust.
- Confidentiality and discretion in handling confidential and sensitive information a must.
- Sound judgment in knowing when to escalate a delicate situation by involving the CPO, or in-house legal counsel as necessary.
- Project and program management skills preferred.
- Demonstrated track record of motivating staff.
- Proactive, creative, innovative approach to training and development.
- High level of proficiency in Microsoft Office suite and other project related technology.
- An analytical and data-driven mindset to prioritize, set goals and track metrics related to the Commission's DEI efforts.
- Share gathered data and metrics with the Commission's Leadership to determine development of future plans and priorities.
- Remain updated on the latest DEI trends, trainings, and tools.

Salary Range: \$103,000 - \$124,000

Benefits Package:

The Commission is pleased to offer a comprehensive benefits package to its employees. The specific components and eligibility may vary based upon position classification, hours worked per week and other variables. Therefore, specific benefits for this position may be discussed as part of the interview and offer process.

This position is non-civil service. This position is an exempt position.

The overall benefits available include: paid vacation, sick and personal leave time, health, dental and vision insurance through the Commonwealth's Group Insurance, and optional pre-tax Health Savings Account plans.

In addition, the Commission provides employees the opportunity to elect life insurance, long-term disability insurance, deferred compensation savings, tuition remission and pre-tax commuter account plans, along with other programs.

The Commission employees also participate in the Commonwealth's State Retirement Plan, which can become a defined benefit plan for those that both vest and subsequently retire from State service. Follow this link for additional retirement information:

<http://www.mass.gov/treasury/retirement/state-board-of-retire/>.

Commitment to Diversity:

The Commission is committed to building a diverse staff across its entire agency and at all levels. The Commission is an equal opportunity/affirmative action employer.

Notice of Required Background Check - Including Tax Compliance:

The Commission requires a background check on all prospective employees as a condition of employment.

Candidates should be aware of this requirement but should also know that such background check is not initiated until:

1. A candidate is invited to a second or subsequent interview, and
2. The candidate has signed the Background Check Authorization Form and related releases.

This background check includes a Criminal Offender Record Information (CORI) check, Federal IRS, and Department of Revenue state tax compliance on all prospective employees as a condition of their employment. The Cannabis Control Commission reserves the right to conduct and or require a physical pre-employment screening, in addition to drug and alcohol testing at its sole discretion.

Candidates with advanced degrees and professional licenses may have these credentials verified. Individuals other than those references provided by a candidate may be contacted while completing a full background and qualification check.

Those candidates invited to interview will be contacted by the Commission. Unfortunately, due to the anticipated high volume of applicants for this vacancy, we are unable to provide status updates to specific individuals.

*Cannabis Control Commission
Job Description*

Department: Investigations and Enforcement Department

Reports To: Chief of Investigations and Enforcement

Job Title: Director of Enforcement Training

FLSA Status: Exempt

I. PURPOSE OF THE JOB

Under the direction of the Chief of Investigations and Enforcement, the Director of Enforcement Training will promote consistency in regulatory oversight and enforcement by administering internal and external training programs related to cannabis industry compliance in the Commonwealth. The Director of Enforcement Training will create internal compliance training programs; monitor and attend external trainings required as a condition of administrative hearing decisions and Dispute Resolution Conference stipulated agreements; create and supervise training efforts related to the secret shoppers' compliance program; provide technical assistance and training guidance related to the Commission's Responsible Vendor Training program; and administer ongoing training programs for Enforcement staff regarding compliance monitoring and investigative techniques. The Director of Enforcement Training will supervise an Enforcement training staff, which may include interns or volunteers who are participating in the Investigations and Enforcement Department compliance program. This position requires a skilled trainer, who has exemplary administrative, organizational, and customer service skills.

II. ESSENTIAL FUNCTIONS AND RESPONSIBILITIES

- Foster the principles of the Commission's Mission Statement among the staff and all stakeholders;
- Establish and administer trainings related to the Commission's licensing, investigations, testing, and enforcement responsibilities;
- Establish and administer trainings related to the Commission's electronic systems, i.e., MassCIP, Metrc, MMJOS, Microsoft Dynamics, etc.;
- Establish and administer specific policy trainings;
- Establish and administer updated trainings based on statutory, regulatory, or policy changes;
- Ensure department staff compliance with other state or Commission mandatory trainings;
- Work with the Commission's finance team to arrange for trainings administered by outside experts for highly specialized subjects;
- Research best practices on training subject matter, including practices utilized by other government agencies;
- Perform educational outreach on general compliance obligations to cannabis industry licensees through compliance bulletins and related notices;
- In order to effectively develop and supervise compliance training programs, participating in investigations, inspections, audits, enforcement action, to ensure that Marijuana Establishments and Medical Marijuana Treatment Centers follow applicable laws, regulations, and policies;
- Supervises Enforcement training staff, interns and volunteers who are facilitating or participating in a compliance training program;

- Responsible for monitoring any licensee compliance training obligations arising from a Commission hearing decision, Informal Dispute Resolution Conference (IDR) stipulated agreements, or suitability cure agreements;
- Manage any vendor relationships relative to maintaining compliance training programs;
- Attend, present, and represent the Commission at public meetings, hearings, and other public forums, when required;
- Willingness to travel to marijuana establishments and other relevant destinations throughout the Commonwealth;
- Assist with the implementation and trainings of regulations after promulgation.

III. OTHER DUTIES AND RESPONSIBILITIES

- Collaborate with other state and local agencies, as well as external constituencies, to raise awareness of the Commonwealth's marijuana laws and regulations.
- Initiate and lead intra-agency cross-training opportunities related to our regulations and other applicable laws;
- Curriculum development, administration, and delivery of accurate, effective, and interactive trainings for the enforcement department.
- Engage in daily phone and digital outreach/marketing campaigns to promote the agency's mission and training opportunities throughout the Commonwealth.
- Meet with stakeholders in order to form training/outreach partnerships.
- Maintain the highest standards of personal, professional, and ethical conduct and support the Commission's goals for a diverse and culturally aware workforce.
- Attend speaking engagements, and conferences as a Commission representative.
- Perform related duties as assigned.

IV. SUPERVISORY RESPONSIBILITIES

- Participating in the hiring of Enforcement training staff;
- Direct daily supervision of Enforcement training staff.

V. KNOWLEDGE AND SKILLS

- Ability to manage and prioritize a high-volume workload.
- Ability to develop and deliver engaging internal and external practical training programs.
- Ability to work collaboratively with cannabis industry stakeholders, including law enforcement agencies.
- Excellent written and oral communication skills.
- Proven problem-solving skills, critical thinking, and sound judgment.
- Developed knowledge of the cannabis regulatory environment.
- Strong interpersonal, executive functioning, and organizational skills.
- Ability to effectively collaborate in a team-oriented setting.
- Ability to maintain accurate training records.
- Ability to operate a motor vehicle and have a valid driver's license.
- Knowledge of the Commission's mission, standards, and goals.
- Knowledge and ability to understand and communicate complex information.

VI. EDUCATION AND EXPERIENCE

- Bachelor's Degree in Criminal Justice or related focus or equivalent experience required, Juris Doctorate from an ABA-accredited law school preferred.

- Verifiable management experience, including a minimum of 3 years of supervisory experience.
- Verifiable ability to develop stakeholder relationships.
- Verifiable experience administering and managing educational trainings to diverse audiences.
- Experience in a regulatory agency or other compliance experience.
- Experience with curriculum development.
- Experience working effectively with individuals from a wide variety of backgrounds.
- Significant travel may be required.

Salary Range: Director classification range

Benefits Package:

The Commission is pleased to offer a comprehensive benefits package to its employees. The specific components and eligibility may vary based upon position classification, hours worked per week and other variables. Therefore, specific benefits for this position may be discussed as part of the interview and offer process.

The Director of Enforcement Training is a management position; as such the successful candidate will be hired as an employee at will. This position is non-civil service. This position is an exempt position.

The overall benefits available include: paid vacation, sick and personal leave time, health, dental and vision insurance through the Commonwealth's Group Insurance, and optional pre-tax Health Savings Account plans.

In addition, the Commission provides employees the opportunity to elect life insurance, long-term disability insurance, deferred compensation savings, tuition remission and pre-tax commuter account plans, along with other programs.

The Commission employees also participate in the Commonwealth's State Retirement Plan, which can become a defined benefit plan for those that both vest and subsequently retire from State service. Follow this link for additional retirement information: <http://www.mass.gov/treasury/retirement/state-board-of-retire/>.

Commitment to Diversity:

The Commission is committed to building a diverse staff across its entire agency and at all levels. The Commission is an equal opportunity/affirmative action employer.

Notice of Required Background Check - Including Tax Compliance:

The Commission requires a background check on all prospective employees as a condition of employment.

Candidates should be aware of this requirement but should also know that such background check is not initiated until:

1. A candidate is invited to a second or subsequent interview, and
2. The candidate has signed the Background Check Authorization Form and related releases.

This background check includes a Criminal Offender Record Information (CORI) check, Federal IRS and Department of Revenue state tax compliance on all prospective employees as a condition of their employment.

Candidates with advanced degrees and professional licenses may have these credentials verified. Individuals other than those references provided by a candidate may be contacted in the course of completing a full background and qualification check.

Those candidates invited to interview will be contacted by the Commission. Unfortunately, due to the anticipated high volume of applicants for this vacancy, we are unable to provide status updates to specific individuals.

###

Cannabis Control Commission
Job Description

Department: Investigations and Enforcement Department **Reports To:** Enforcement Counsel

Job Title: First Assistant Enforcement Counsel **FLSA Status:** Exempt

I. PURPOSE OF THE JOB

The First Assistant Enforcement Counsel, under the direction of the Enforcement Counsel, represents the Commission in complex administrative litigation matters initiated by the Investigations and Enforcement department. The First Assistant Enforcement Counsel assists the Enforcement Counsel with oversight, operations, and decision making relative to advising the agency on all enforcement-related matters, including supervisory responsibilities, as assigned. The First Assistant Enforcement Counsel will prosecute complex administrative litigation matters and also assist the agency through court appearances on external litigation matters involving the Investigations and Enforcement department.

II. ESSENTIAL FUNCTIONS AND RESPONSIBILITIES

- Assist Enforcement Counsel with oversight, operations, and decision making relative to the Enforcement Counsel team and advising the agency on enforcement-related matters;
- Represent the agency on appellate enforcement matters that have advanced to Superior Court for judicial review pursuant to G.L. c. 30A;
- Assist the agency through court appearances for external litigation matters involving cases that are pending with, or have been initiated by, the Investigations and Enforcement department;
- Prosecute complex enforcement matters in formal and informal administrative hearings conducted pursuant to G.L. c. 30A, to include drafting motions, briefs, discovery requests, preparing evidence, conducting direct and cross examination, negotiating disputes at dispute resolution conferences, and drafting compliance stipulated agreements;
- Assist Enforcement Counsel in advising the Commission on enforcement-related legal matters, including but not limited to the Commission's Chief of Investigations and Enforcement, Director of Licensing, Director of Investigations, and Director of Testing and their staff, as evidenced by the development of coherent and well-researched written and oral advice;
- Assist with the supervision of Enforcement Counsel staff as assigned by Enforcement Counsel;
- Lead special investigations as assigned;
- Attend, present, and represent the Commission at public meetings and other public forums in relation to enforcement matters;
- Develop subject matter expertise in the areas of compliance monitoring, assessment, and enforcement of the Commonwealth's marijuana laws;
- Foster the principles of the Commission's Mission Statement among the staff and all stakeholders;

- Monitor developments in federal marijuana policy, state regulatory guidance and the regulated cannabis industry; and
- Collaborate with federal, state, and local government agencies on enforcement-related matters where appropriate and assist the Chief of Investigations and Enforcement on other special initiatives as needed;

III. OTHER DUTIES AND RESPONSIBILITIES

- Maintain the highest standards of personal, professional, and ethical conduct and support the Commission's goals for a diverse and culturally aware workforce; and
- Perform related duties as assigned.

IV. KNOWLEDGE AND SKILLS

- Creativity, intellectual flexibility, and the ability to navigate a wide range of multi-faceted issues;
- Excellent written and oral communication skills;
- Excellent analytical skills;
- Proven problem-solving skills, executive functioning, critical thinking, and sound judgment;
- Knowledge and familiarity with cannabis laws and the cannabis industry;
- Ability to synthesize complex information and convey legal arguments and opinions to a wide range of audiences;
- Ability to conduct comprehensive legal research, including the ability to analyze legal precedent and apply it to factual circumstances;
- Ability to present clear, concise, and well-founded legal arguments and opinions;
- Ability to exercise sound judgment in complex situations;
- Ability to exercise discretion when handling confidential information;
- Strong interpersonal and organizational skills;
- Ability to work independently, productively, and collaboratively in an evolving environment;
- Commitment to building constructive working relationships;
- Ability to resolve disputes with external stakeholders in a timely manner;
- Must demonstrate a proficiency with computers and MS Office Suite (Outlook, Word, Excel, PowerPoint);
- Willingness to learn state and Commission-specific electronic systems;
- Ability to work in and travel to our Worcester headquarters; and
- Willingness to travel throughout the Commonwealth when necessary.

V. EDUCATION AND EXPERIENCE

- Juris Doctor from an ABA-accredited law school and a member in good standing with the Massachusetts bar;
- Experience or familiarity with the Commonwealth's cannabis laws;
- Minimum five-year experience practicing law, preferably in the public sector;
- Demonstrated appellate advocacy experience
- Experience or familiarity with state agencies, especially state commissions;
- Experience in complex civil or criminal litigation;
- Experience in managing large caseloads and/or prosecuting complex cases;
- Experience in administrative law and litigation, licensing and/or investigations;
- Knowledge and understanding of the administrative adjudicatory hearing process

- Knowledge in the areas of constitutional law and/or statutory interpretation;
- Experience in a regulatory agency.
- Experience in corporate, contracts and/or municipal law is a plus

Salary Range: ~~\$105,000 - \$120,000 (Classification needed)~~ ~~\$70,000 - \$80,000~~

Benefits Package:

The Commission is pleased to offer a comprehensive benefits package to its employees. The specific components and eligibility may vary based upon position classification, hours worked per week and other variables. Therefore, specific benefits for this position may be discussed as part of the interview and offer process.

This position is non-civil service. This position is an exempt position.

The overall benefits available include paid vacation, sick and personal leave time, health, dental and vision insurance through the Commonwealth's Group Insurance, and optional pre-tax Health Savings Account plans.

In addition, the Commission provides employees the opportunity to elect life insurance, long term disability insurance, deferred compensation savings, tuition remission and pre-tax commuter account plans, along with other programs.

The Commission employees also participate in the Commonwealth's State Retirement Plan, which can become a defined benefit plan for those that both vest and subsequently retire from State service. Follow this link for additional retirement information:

<http://www.mass.gov/treasury/retirement/state-board-of-retire/>.

Commitment to Diversity:

The Commission is committed to building a diverse staff across its entire agency and at all levels. The Commission is an equal opportunity/affirmative action employer.

Application Process and Deadline:

The Commission encourages interested candidates that meet the minimum requirements for experience and skills to apply for this position. Interested candidates should submit a cover letter and resume by email no later than **XXXXXX**. The application package should be submitted to:

Careers@cccmass.com

Please include the position title in the subject line: CCC - Associate Enforcement Counsel

Submissions are due by 5:00 pm (e-mail) on **XXXXXX**, late submissions may be considered solely at the discretion of the Commission.

Notice of Required Background Check - Including Tax Compliance:

The Commission requires a background check on all prospective employees as a condition of employment.

Candidates should be aware of this requirement but should also know that such background check is not initiated until:

1. A candidate is invited to a second or subsequent interview, and
2. The candidate has signed the Background Check Authorization Form and related releases.

This background check includes a Criminal Offender Record Information (CORI) check, Federal IRS and Department of Revenue state tax compliance on all prospective employees as a condition of their employment.

Candidates with advanced degrees and professional licenses may have these credentials verified. Individuals other than those references provided by a candidate may be contacted in the course of completing a full background and qualification check.

Those candidates invited to interview will be contacted by the Commission. Unfortunately, due to the anticipated high volume of applicants for this vacancy, we are unable to provide status updates to specific individuals.

*Cannabis Control Commission
Job Description*

Department: Investigations and Enforcement Department

Reports to: Investigations Manager

Job Title: Senior Investigator

FLSA Status: Exempt

I. PURPOSE OF THE JOB

The Cannabis Control Commission (Commission) Senior Investigator conducts inspections and investigations of licensed Marijuana Establishments (ME) and Marijuana Treatment Centers (MTC) in the Commonwealth to ensure understanding and compliance with laws, rules, and regulations. A significant component of this position includes visiting MEs and MTCs across the Commonwealth and completing regulatory compliance inspections/audits targeting operational requirements, which may include specific cultivation, product manufacturing, and retail requirements as it pertains to the license type, as well as facility management requirements. Investigator(s) assist in the administration of the registration and licensing compliance process for MEs and MTCs as well as individually registered agents as defined in the regulations. The Senior Investigator will also lead complex investigations and highly involved enforcement actions. The Senior Investigator will assist with supervisory responsibilities when assigned.

II. ESSENTIAL FUNCTIONS AND RESPONSIBILITIES

- Conducts and reports about on-site inspections of MEs and MTCs;
- Tracks compliance with all relevant laws and regulations through on-site visits, auditing, and inspection of records;
- Responds to inquiries from all the parties, constituents, and/or the public by providing outstanding customer service in a reasonable timeframe via on-site visits, telephone, email and/or other written correspondence;
- Assists with ongoing documentation and implementation of Commission policies and procedures to reflect best practices in this growing industry;
- Reviews policies, processes, and oversight of MEs and MTCs to ensure compliance with the regulations (examples of specific policies may include: security policies, product safety policies, sanitation, and waste disposal policies);
- Conducts investigations in a reasonable timeframe by developing investigative plans, gathering, verifying, analyzing, and reviewing documents relating to any investigation or inquiry pursuant to state law and regulations;
- Interviews witnesses, and requests production of documents through request(s) for information
- Reviews the implementation of ME/MTC policies and procedures to ensure the security of the cultivation, processing, and dispensing of marijuana;
- Reviews ME/MTC processes and procedures when determining the placement and proper use of surveillance cameras and other security controls;
- Reviews standards and implementation for storage facilities regarding the use of lighting, ventilation, labeling, security procedures, access controls, etc.;
- Inspects procedures outlined in the ME/MTC's operational documents to ensure compliance with required seed-to-sale tracking;
- Reviews and assesses protocols for the testing of marijuana and marijuana products;
- Reviews all operational policies and procedures, such as: quality control, record keeping and reporting, staffing plans, human resources policies, staff training, business records for accounting administration and operations standards;

- Conduct detailed and/or complex investigative conferences, analyze and preserve evidence;
- Responds to rule violations, incidents, or complaints by issuing deficiency statements in a timely manner and evaluating and approving plans for corrective action;
- Drafts investigative memoranda and other reports;
- Represents Commission in administrative or court hearings related to non-compliance;
- Confers with complainants to resolve issues and encourage compliance with established laws, rules, and regulations through settlement, where appropriate;
- Obtains evidence and establishes facts concerning non-compliance with laws, rules, and regulations regarding marijuana cultivation, processing, and distribution;
- Maintains thorough documentation of inspections and responds to corrective actions recommendations;
- Makes appropriate referrals to Enforcement Counsel in collaboration with the Director of Investigations;
- Summarizes and make appropriate recommendations by writing factually sound reports by applying relevant evidence and legal analysis;
- Complies with quality control procedures to ensure information is accurate and complete;
- Maintains a caseload and updated records in case management system; and
- Assist Investigations Managers with supervisory responsibilities as assigned.

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;
- Maintains professional relationships with assigned agency personnel and various private, local, state, and federal agencies;
- Makes relevant referrals to appropriate state, local, and federal agencies;
- Communicates and, if assigned, works collaboratively with different teams, departments, state and local agencies, including law enforcement and local boards of health;
- Responds to inquiries and complaints to provide information concerning medical use of marijuana and adult-use of marijuana laws, regulations, rules, and procedures;
- Performs related duties such as maintaining records, attending meetings, and preparing correspondence including emails and letters;
- Assists in determining compliance with applicable laws and standards and recommending enforcement actions; and
- Performs other related duties as assigned.

IV. KNOWLEDGE AND SKILLS

- Ability to operate a motor vehicle;
- Possesses a valid Motor Vehicle Operator's License from Massachusetts or another state;
- Ability to establish rapport with persons from different ethnic, cultural, and/or economic backgrounds;
- Ability to use investigative techniques to obtain information;
- Ability to gather information from questioning individuals and observation;
- Ability to gather information by examining records and documents;
- Ability to maintain strict confidentiality;
- Ability to maintain an in-depth knowledge of state statutes related to work performed and agency rules and regulations including 935 CMR 500.000 and 935 CMR 501.000;
- Ability to proficiently utilize computers and MS Office Suite (Word, Excel, Outlook, PowerPoint);
- Ability to write concisely, to express thoughts clearly, and to develop ideas in logical sequence;
- Ability to work independently, as well as with teams;
- Experience or familiarity with administrative law and procedure;
- Ability to exercise discretion in handling confidential information;
- Ability to maintain composure and a calm demeanor in stressful and emergency situations;

- Ability to spend much of the workweek traveling to ME/MTC locations throughout the Commonwealth. Typical schedules may require occasional work on the weekends to conduct inspections;
- Ability to travel to and work in our Worcester headquarters; and
- Approximately 60-70% of the time is spent in the field, out of the office.

V. EDUCATION AND EXPERIENCE

- Bachelor's degree required; advanced degree preferred;
- Extensive report writing experience required;
- Five years of full-time, or equivalent part-time, experience in investigatory or inspection work, or an equivalent or related field;

One or more of the following:

- Experience with financial or fraud investigations, audits, forensic accounting, data finance, and/or data analysis;
- CPA or CPE certification preferred;
- Regulatory compliance experience in the food industry, including safety inspections related to food preparation;
- Experience with building inspection, building code compliance, architectural review, or related inspections;
- Regulatory compliance experience in the pharmaceutical industry;
- Experience in the chemistry industry and public health;
- Experience with agriculture, horticulture, farming, or hydroponic growing;
- Experience in analysis of laboratory tests;
- Experience in energy compliance; and
- Knowledge of and ability to understand and explain independent laboratory tests of soil, temperature, humidity, and carbon dioxide type and use of fertilizers; and processes to implement best practices to limit contamination.

VI. SALARY RANGE: (New Classification range needed; above Investigators but below Investigations Managers)

Please note that this position is being offered as promotional opportunities within the agency.

Benefits Package:

The Commission is pleased to offer a comprehensive benefits package to its employees. The specific components and eligibility may vary based upon position classification, hours worked per week and other variables. Therefore, specific benefits for this position may be discussed as part of the interview and offer process.

This position is non-civil service. This position is an exempt position.

The overall benefits available include: paid vacation, sick and personal leave time, health, dental and vision insurance through the Commonwealth's Group Insurance, and optional pre-tax Health Savings Account plans.

In addition, the Commission provides employees the opportunity to elect life insurance, long-term disability insurance, deferred compensation savings, tuition remission and pre-tax commuter account plans, along with other programs.

The Commission employees also participate in the Commonwealth's State Retirement Plan, which can become a defined benefit plan for those that both vest and subsequently retire from State service. Follow this link for additional retirement information: <http://www.mass.gov/treasury/retirement/state-board-of-retire/>.

Commitment to Diversity:

The Commission is committed to building a diverse staff across its entire agency and at all levels. The Commission is an equal opportunity/affirmative action employer.

Notice of Required Background Check - Including Tax Compliance:

The Commission requires a background check on all prospective employees as a condition of employment.

Candidates should be aware of this requirement but should also know that such background check is not initiated until:

1. A candidate is invited to a second or subsequent interview, and
2. The candidate has signed the Background Check Authorization Form and related releases.

This background check includes a Criminal Offender Record Information (CORI) check, Federal IRS, and Department of Revenue state tax compliance on all prospective employees as a condition of their employment. The Cannabis Control Commission reserves the right to conduct and or require a physical pre-employment screening, in addition to drug and alcohol testing at its sole discretion.

Candidates with advanced degrees and professional licenses may have these credentials verified. Individuals other than those references provided by a candidate may be contacted while completing a full background and qualification check.

Those candidates invited to interview will be contacted by the Commission. Unfortunately, due to the anticipated high volume of applicants for this vacancy, we are unable to provide status updates to specific individuals.

Memorandum

To: Commissioners
Cc: Debra Hilton-Creek, Acting Executive Director; Cedric Sinclair, Chief Communications Officer
From: Matt Giancola, Director of Government Affairs and Policy
Date: November 9, 2023
Subject: **November 2023 Government Affairs Update**

Executive Branch Update

Commissioners Nurys Camargo and Bruce Stebbins joined a call with Executive Office of Economic Development Assistant Secretary Juan Vega to discuss the Social Equity Trust Fund.

Municipal Update

Municipal Law Unit

The Attorney General's Municipal Law Unit (MLU) issued [one marijuana-related decision](#) recently:

Town of Chesterfield: The MLU approved zoning by-laws adopted at the March 2023 Special Town Meeting, with the exception of certain provisions that were at conflict with the Commission regulations. These conflicts pertained to the definition of Marijuana Treatment Centers and the method used to measure buffer zones.



Cannabis Control Commission

Monthly Public Meeting

November 9, 2023 at 10:00 a.m.

Via Microsoft Teams



Agenda

- Call to Order
- Commissioners' Comments and Updates
- Acting Chair Discussion and Vote
- Minutes for Approval
- Acting Executive Director and Commission Staff Report
- Staff Recommendations on Changes of Ownership
- Staff Recommendations on Renewals
- Staff Recommendations on Provisional Licenses
- Staff Recommendations on Final Licenses
- Staff Recommendations on Responsible Vendor Training
- Commission Discussion and Votes
- New Business that the Chair did not Anticipate at the Time of Posting
- Next Meeting Date and Adjournment

Commission Updates

- Chapter 180 Regulations – Promulgated October 27, 2023
- FY2025 Budget Build Update
- Departmental Update
 - Investigations & Enforcement
 - Research
- HR Recruitment Update
- General Counsel Introduction



Highlights from Licensing Data*

- 3 applications awaiting first review
- 5 applications awaiting supplemental review
- 3 applications for Provisional License consideration
- 8 licensees for Final License consideration



Licensing Applications | November 9, 2023

The totals below are number of approvals by stage.

Type	#
Pre-Certified/Delivery Endorsed Microbusiness	202
Provisionally Approved	141
Provisional License	532
Final License	55
Commence Operations	600
Total	1,530

➔ +32%

* Note: This represents the percent increase since November 2022

Provisionally approved means approved by the Commission but has not submitted license fee payment yet - provisional license has not started



Licensing Applications | November 9, 2023

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	2	N/A	0	0	4	0	0	6
Marijuana Courier License	12	N/A	0	0	11	1	10	34
Marijuana Courier Pre-Certification	13	100	0	N/A	N/A	N/A	N/A	113
Independent Testing Laboratory	1	N/A	0	2	3	1	14	21
Marijuana Cultivator	47	N/A	2	49	188	26	118	430
Marijuana Delivery Operator License	8	N/A	0	0	25	0	9	42
Marijuana Delivery Operator Pre-Certification	14	98	0	N/A	N/A	N/A	N/A	112
Marijuana Microbusiness	7	N/A	0	4	17	2	11	41
Marijuana Product Manufacturer	31	N/A	1	48	139	15	102	336
Marijuana Research Facility	5	N/A	0	1	1	0	0	7
Marijuana Retailer	50	N/A	2	34	140	10	327	563
Marijuana Transporter with Other Existing ME License	4	N/A	0	3	4	0	3	14
Microbusiness Delivery Endorsement	1	4	0	0	0	0	1	6
Third Party Transporter	9	N/A	0	0	0	0	5	14
Standards Laboratory	0	N/A	0	0	0	0	0	0
Total	204	202	5	141	532	55	600	1,739





Staff Recommendations on Licensure

Staff Recommendations: Changes of Ownership

1. Catahoula Cannabis LLC
2. Hudson Growers Alliance, LLC
3. MedMen Boston, LLC
4. Munro Associates, LLC d/b/a The Vault
5. Theory Wellness, Inc.
6. Twisted Growers LLC
7. Webber Road Ops, LLC D/B/A Pioneer Cannabis Company



Staff Recommendations: Renewals

1. 4bros Inc (#MRR206662)
2. 617 Therapeutic Health Care, Inc. (#MRR206639)
3. 617 Therapeutic Health Center, Inc. (#MCR140620)
4. ACMJ, Inc. (#MCR140556)
5. Advanced Cultivators, LLC (#MCR140593)
6. Ashli's Extracts, Inc. (#MPR244053)
7. Ashli's Farm, Inc. (#MCR140576)
8. Ashli's, Inc. (#MRR206592)
9. B.O.T Realty, LLC (#MRR206631)
10. Cannabis of Worcester LLC (#MRR206638)
11. Caroline's Cannabis, LLC (#MRR206650)
12. Coastal Cultivars, Inc. (#MPR243909)
13. Cosmopolitan Dispensary, Inc. (#MRR206604)
14. Curaleaf Massachusetts, Inc. (#MPR244050)
15. Curaleaf Massachusetts, Inc. (#MCR140575)
16. Curaleaf North Shore, Inc. (#MPR244049)
17. Curaleaf North Shore, Inc. (#MCR140565)



Staff Recommendations: Renewals

31. Haverhill Stem LLC (#MRR206643)
32. Impressed LLC (#MCR140603)
33. Jolly Green Inc (#MCR140604)
34. Lifted Genetics, LLC (#MCR140601)
35. Littleton Apothecary LLC (#MRR206647)
36. M3 Ventures, Inc (#MRR206620)
37. M3 Ventures, Inc. (#MPR244066)
38. M3 Ventures, Inc. (#MCR140582)
39. Mainely Productions LLC (#MCR140606)
40. Mass Greenwoods LLC (#MRR206635)
41. Massachusetts Green Retail, Inc. (#MRR206659)
42. MINUTEMAN FARM, LLC (#MCR140586)
43. NAKED NATURE, LLC (#MBR169314)
44. Neamat, LLC (#MPR244073)
45. New Green LLC (#MRR206648)



46. Nova Farms, LLC (#MPR244075)

Staff Recommendations: Renewals

61. Temescal Wellness of Massachusetts, LLC (#MPR244074)

62. Temescal Wellness of Massachusetts, LLC (#MCR140597)

63. Terpene Journey, LLC (#MRR206645)

64. The Blue Jay Botanicals, Inc. (#MRR206658)

65. The Haven Center, Inc. (#MRR206537)

66. The Haven Center, Inc. (#MRR206536)

67. The Haven Center, Inc. (#MPR244022)

68. The Haven Center, Inc. (#MCR140540)

69. The Haven Center, Inc. (#MRR206485)

70. The Healing Center LLC (#MRR206579)

71. Tree Market Lynn LLC (#MRR206669)

72. Tree Market Taunton LLC (#MRR206668)

73. UC Retail, LLC (#MRR206651)

74. Volcann LLC (#MRR206642)

75. Wellman Farm, Inc. (#MPR244031)

76. 4bros, Inc. (#RMD1325)

77. ACK Natural, LLC (#RMD1627)



Staff Recommendations: Renewals

90. Patriot Care Corp. (#RMD727)

91. Patriot Care Corp. (#RMD265)

92. Revolutionary Clinics II, Inc. (#RMD925)

93. Revolutionary Clinics II, Inc. (#RMD1346)

94. Sanctuary Medicinals, Inc. (#RMD605)

95. Sanctuary Medicinals, Inc. (#RMD1128)



Staff Recommendations: Provisional Licenses

1. Finest Trees, LLC (#DOA100163), Marijuana Courier
2. Porter Square Remedies, LLC (#MRN284796), Retail
3. The Stories Company Whitman, LLC (#MRN284846), Retail



Staff Recommendations: Final Licenses

1. Gan Or, LLC (#MP282097), Product Manufacturing
2. Gan Or, LLC (#MD1292), Marijuana Delivery Operator
3. Northampton Labs (#IL281313), Independent Testing Laboratory
4. Nuestra, LLC (#MR281469), Retail
5. Pluto Cannabis Co. (#MR284913), Retail
6. Rhythm of Life, LLC (#MC283475), Cultivation, Tier 1 / Indoor
7. Rhythm of Life, LLC (#MP282066), Product Manufacturing
8. Seaside Joint Ventures, Inc. (#MR284549), Retail



Staff Recommendations: Responsible Vendor Training

1. C1 Compliance Group (#RVN454102)





The Commission is in recess
until



Commission Discussion & Votes

Commission Discussion & Votes

- Job Description: Diversity, Equity, Inclusion / Employee Relations
Director
- Job Description: Director of Enforcement Training
- Job Description: First Assistant Enforcement Counsel
- Job Description: Senior Investigator





**The Commission is
in Executive Session**



Upcoming Meetings & Adjournment

Upcoming Meetings and Important Dates

Public Meetings dates are tentative and subject to change

Next Meeting Dates

November 16

Public Meeting on Policy
10:00am

2023 Public Meetings*

December 14



Additional Licensing Data

Licensing Applications | November 9, 2023

The totals below are all license applications received to date.

Type	#
Pending	204
Withdrawn	1,316
Incomplete	7,938
Denied	5
Approved: Delivery Pre-certifications	198
Approved: Delivery Endorsements	5
Approved: Licenses	1,327
Total	10,993



Licensing Applications | November 9, 2023

The totals below are number of licenses approved by category.

Type	#
Craft Marijuana Cooperative	4
Marijuana Courier	22
Marijuana Delivery Operator	34
Independent Testing Laboratory	20
Marijuana Cultivator	381
Marijuana Microbusiness	34
Marijuana Product Manufacturer	304
Marijuana Research Facility	2
Marijuana Retailer	511
Marijuana Third Party Transporter	5
Marijuana Transporter with Other Existing ME License	10
Total	1,327



Licensing Applications | November 9, 2023

Status	#
Application Submitted: Awaiting Review	3
Application Reviewed: More Information Requested	189
Application Deemed Complete: Awaiting 3rd Party Responses	9
All Information Received: Awaiting Commission Consideration	3
Applications Considered by Commission (includes Delivery Pre-Cert)	1,535
Total	1,739



Licensing Applications | November 9, 2023

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)	12
Delivery-Only Pre-Certification (Part 1)	13
Independent Testing Laboratory	1
Marijuana Cultivator	47
Marijuana Delivery Operator Provisional License (Part 2)	8
Marijuana Delivery Operator Pre-Certification (Part 1)	14
Marijuana Microbusiness	7
Marijuana Product Manufacturer	31
Marijuana Research Facility	5
Marijuana Retailer	50
Marijuana Transporter with Other Existing ME License	4
Microbusiness Delivery Endorsement	1
Third Party Transporter	9
Total	204



Licensing Applications | November 9, 2023

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Marijuana Cultivator (Indoor)	37	N/A	1	33	171	22	95	359
Marijuana Cultivator (Outdoor)	10	N/A	1	5	17	4	23	60
Total	47	N/A	2	38	188	26	118	419



Licensing Applications | November 9, 2023

Of 1,530 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	42	165	28	202
Provisionally Approved	12	19	26	141
Provisional License	33	92	107	532
Final License	1	2	7	55
Commence Operations	25	42	70	600
Total	113	320	238	1,530

↑0.2%

↑ 2.1%

↓0.4%

* Note: This represents the increase since November 2022



Licensing Applications | November 9, 2023

The totals below are distinct license numbers that have submitted all required packets.

The 1,739 applications represent 979 separate entities

Type	#
MTC Priority	255
Economic Empowerment Priority	132
Expedited Review	652
General Applicant	700
Total	1,739

Type	#
Expedited: License Type	80
Expedited: Social Equity Participant	324
Expedited: Disadvantaged Business Enterprise	193
Expedited: Two or More Categories	55
Total	652



Licensing Applications - EE Only | November 9, 2023

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	0	N/A	0	0	0	0	0	0
Marijuana Courier License	3	N/A	0	0	4	0	4	11
Marijuana Courier Pre-Certification	2	28	0	N/A	N/A	N/A	N/A	30
Independent Testing Laboratory	0	N/A	0	0	0	0	0	0
Marijuana Cultivator	2	N/A	0	3	4	0	0	9
Marijuana Delivery Operator License	1	N/A	0	0	4	0	2	7
Marijuana Delivery Operator Pre-Certification	1	14	0	N/A	N/A	N/A	N/A	15
Marijuana Microbusiness	0	N/A	0	0	0	0	0	0
Marijuana Product Manufacturer	0	N/A	0	4	2	0	2	8
Marijuana Research Facility	1	N/A	0	0	0	0	0	1
Marijuana Retailer	5	N/A	0	4	18	1	17	45
Marijuana Transporter with Other Existing ME License	0	N/A	0	1	1	0	0	2
Microbusiness Delivery Endorsement	0	0	0	0	0	0	0	0
Third Party Transporter	1	N/A	0	0	0	0	0	1
Standards Laboratory	0	N/A	0	0	0	0	0	0
Total	16	42	0	12	33	1	25	129



Licensing Applications - SEP Only | November 9, 2023

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	0	N/A	0	0	1	0	0	1
Marijuana Courier License	8	N/A	0	0	7	1	7	23
Marijuana Courier Pre-Certification	11	78	0	N/A	N/A	N/A	N/A	89
Independent Testing Laboratory	0	N/A	0	0	0	0	0	0
Marijuana Cultivator	2	N/A	0	7	18	0	6	33
Marijuana Delivery Operator License	4	N/A	0	0	22	0	7	33
Marijuana Delivery Operator Pre-Certification	12	84	0	N/A	N/A	N/A	N/A	96
Marijuana Microbusiness	1	N/A	0	0	5	0	2	8
Marijuana Product Manufacturer	5	N/A	1	6	16	1	6	34
Marijuana Research Facility	0	N/A	0	0	0	0	0	0
Marijuana Retailer	11	N/A	0	5	21	0	12	50
Marijuana Transporter with Other Existing ME License	1	N/A	0	1	2	0	1	5
Microbusiness Delivery Endorsement	1	3	0	0	0	0	1	5
Third Party Transporter	1	N/A	0	0	0	0	0	1
Standards Laboratory	0	N/A	0	0	0	0	0	0
Total	57	165	1	19	92	2	42	378



Cultivation Applications | November 9, 2023

Type	Pending Application	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Microbusiness w/ Tier 1 Cultivation (up to 5,000 sq. Ft.)	0	0	3	6	1	6	16
Cultivation Tier 1 (Up to 5,000 sq. ft.)	15	0	7	36	5	20	83
Cultivation Tier 2 (5,001-10,000 sq. ft.)	6	0	9	56	11	30	112
Cultivation Tier 3 (10,001-20,000 sq. ft.)	5	2	9	42	3	20	81
Cultivation Tier 4 (20,001-30,000 sq. ft.)	2	0	4	13	3	11	33
Cultivation Tier 5 (30,001-40,000 sq. ft.)	2	0	9	8	1	10	30
Cultivation Tier 6 (40,001-50,000 sq. ft.)	3	0	4	8	1	6	22
Cultivation Tier 7 (50,001-60,000 sq. ft.)	2	0	1	4	0	4	11
Cultivation Tier 8 (60,001-70,000 sq. ft.)	1	0	0	1	0	2	4
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	0	6	9
Cultivation Tier 11 (90,001-100,000 sq. ft.)	7	0	4	16	1	7	35
Total	47	2	52	194	27	124	446
Total Maximum Canopy (Sq. Ft.)	1,745,000	40,000	1,630,000	4,960,000	560,000	3,640,000	2,095,000

%

%

* Note: percentage is of "Total" commence operations licenses



MMJ Licensing and Registration Data | November 9, 2023

The numbers below are a snapshot of the program for the month of November.

MTC Licenses	#
Provisional	25
Final	2
Commence Operations	102
License Expired	61
Total	190

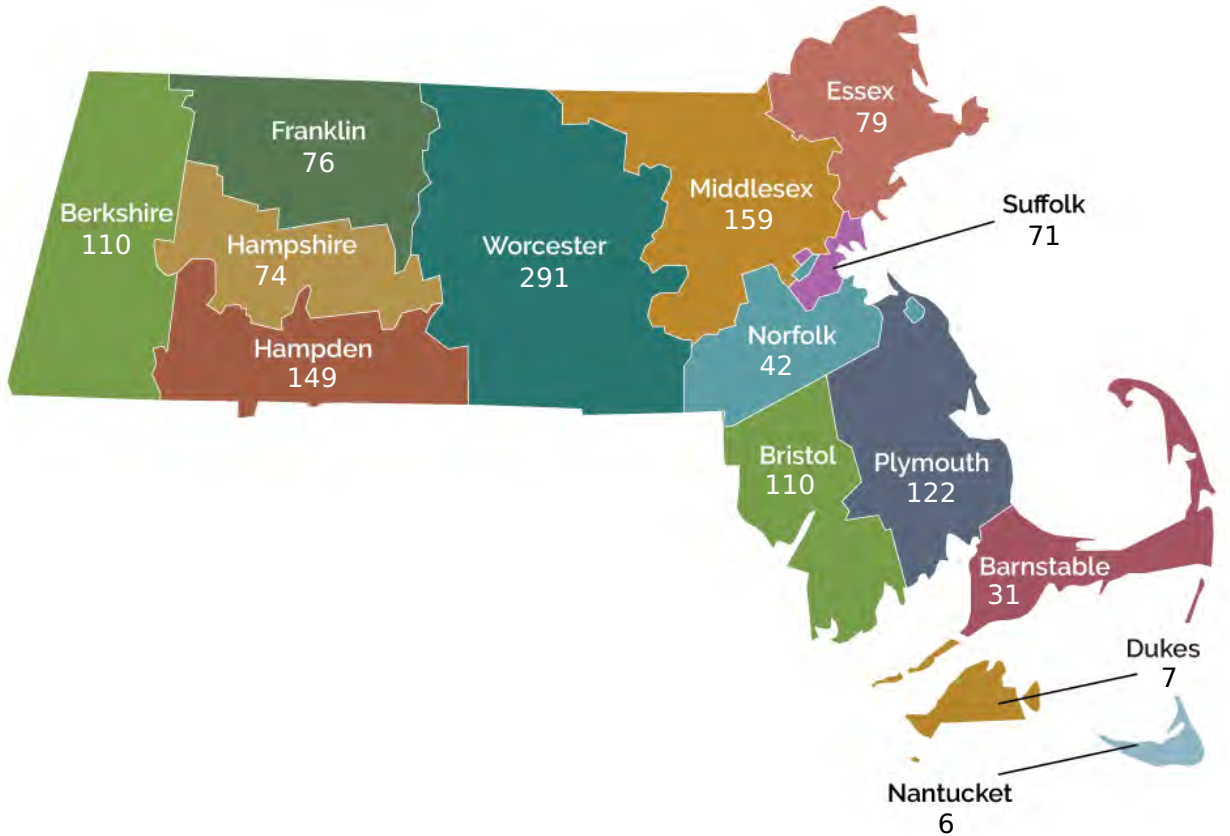
MMJ Program	#
Certified Patients	98,221 (-380)
Certified Active Patients	92,419 (-353)
Active Caregivers	7,087 (-25)
Registered Certifying Physicians	324 (+1)
Registered Certifying Nurse Practitioners	118 (NA)
Registered Physician Assistants	1 (NA)
Ounces Sold	94,305



Marijuana Establishment Licenses | November 9, 2023

The totals below represent entities in each county that have achieved at least a provisional license

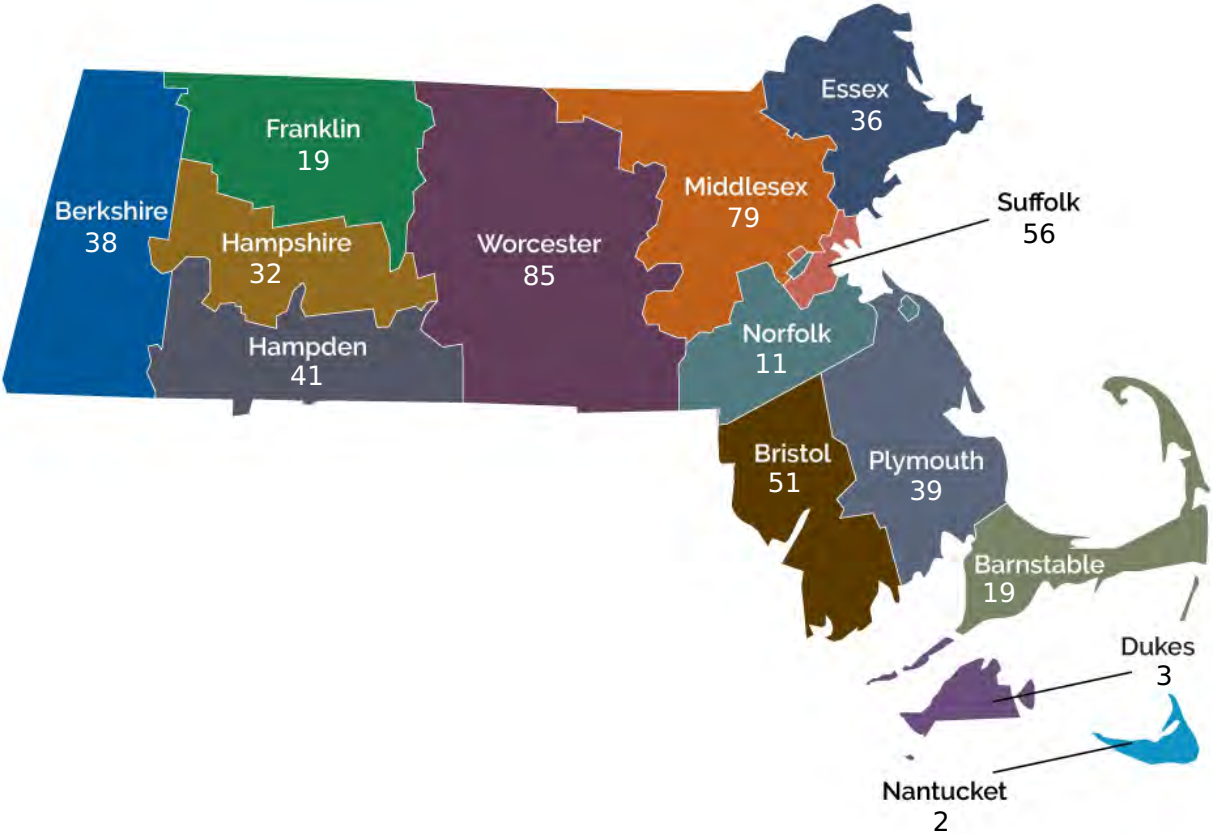
County	#	+/-
Barnstable	31	0
Berkshire	110	0
Bristol	110	0
Dukes	7	0
Essex	79	0
Franklin	76	0
Hampden	149	2
Hampshire	74	0
Middlesex	159	1
Nantucket	6	0
Norfolk	42	0
Plymouth	122	2
Suffolk	71	3
Worcester	291	1
Total	1,327	9



Marijuana Retailer Licenses | November 9, 2023

The totals below are the total number of retail licenses by county.

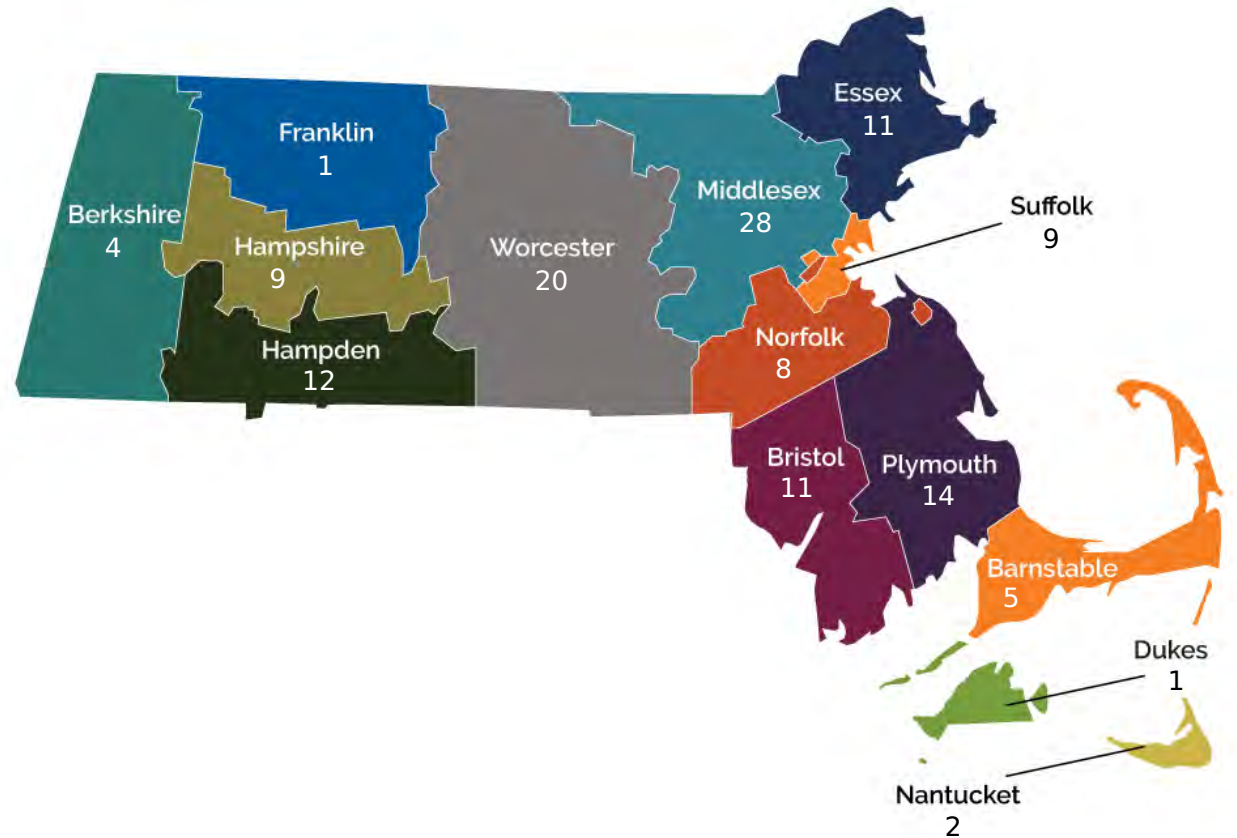
County	#	+/-
Barnstable	19	0
Berkshire	38	0
Bristol	51	0
Dukes	3	0
Essex	36	0
Franklin	19	0
Hampden	41	1
Hampshire	32	0
Middlesex	79	1
Nantucket	2	0
Norfolk	11	0
Plymouth	39	1
Suffolk	56	3
Worcester	85	1
Total	511	7



Medical Marijuana Treatment Center Licenses (Dispensing) November 9, 2023

The totals below are the total number of MTC (Dispensing) licenses by county.

County	#
Barnstable	5
Berkshire	4
Bristol	11
Dukes	1
Essex	11
Franklin	1
Hampden	12
Hampshire	9
Middlesex	28
Nantucket	2
Norfolk	8
Plymouth	14
Suffolk	9
Worcester	20
Total	135

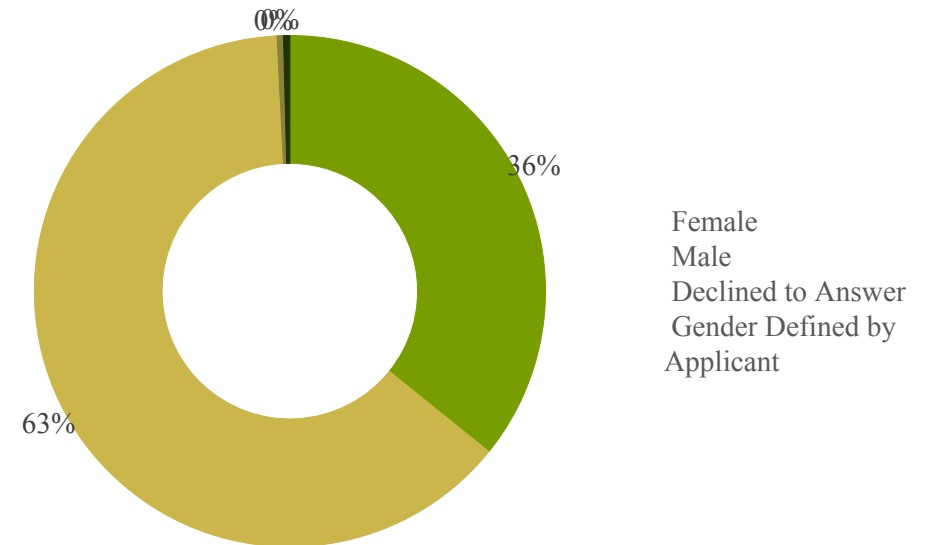


Agent Applications | November 9, 2023

Demographics of Approved and Pending Marijuana Establishment Agents

Gender	#	%
Female	8,090	35.8%
Male	14,247	63.0%
Declined to Answer	190	0.8%
Gender Defined by Applicant	101	0.4%
Total	22,628	100.0%

Gender of Approved and Proposed Agents

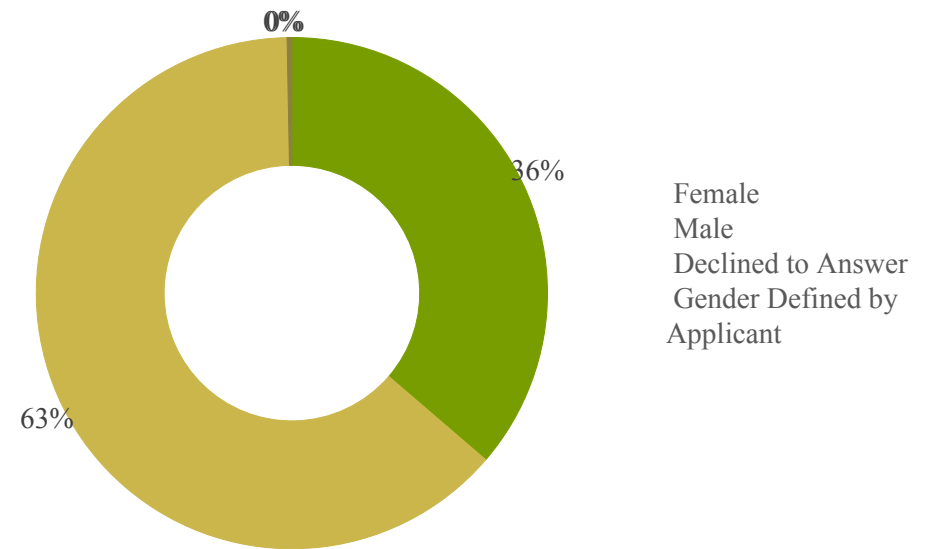


Agent Applications | November 9, 2023

Demographics of Approved and Pending Medical Marijuana Treatment Center Agents

Gender	#	%
Female	2,738	36.5%
Male	4,736	63.1%
Declined to Answer	26	0.4%
Gender Defined by Applicant	0	0.0%
Total	7,500	100.0%

Gender of Approved and Proposed MTC A

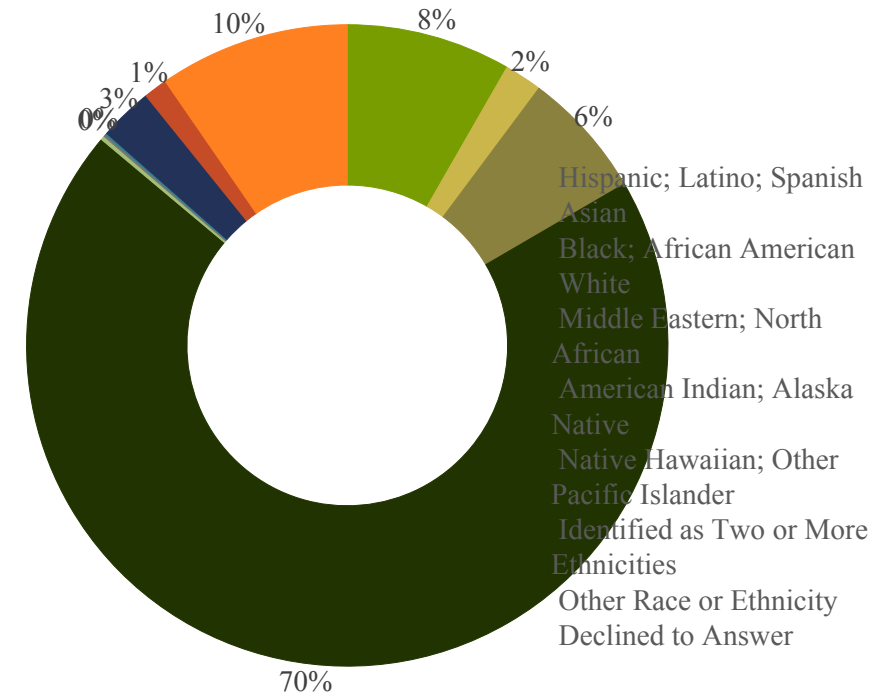


Agent Applications | November 9, 2023

Demographics of Approved and Pending Marijuana Establishment Agents

Race/Ethnicity of Approved and Proposed ME Agents

Race/Ethnicity	#	%
Hispanic; Latino; Spanish	1,933	8.5%
Asian	464	2.1%
Black; African American	1,415	6.3%
White	15,185	67.1%
Middle Eastern; North African	57	0.3%
American Indian; Alaska Native	32	0.1%
Native Hawaiian; Other Pacific Islander	17	0.1%
Identified as Two or More Ethnicities	624	2.8%
Other Race or Ethnicity	213	0.9%
Declined to Answer	2,688	11.9%
Total	22,628	100.0%

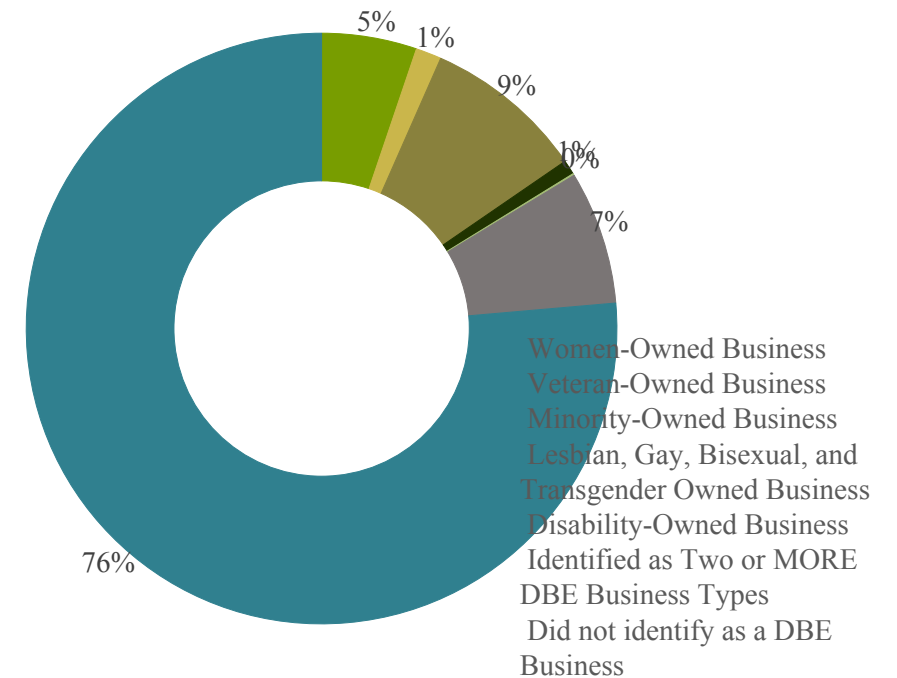


Licensing Applications | November 9, 2023

Disadvantaged Business Enterprise Statistics for Approved Licensees

Type	#	% of Group
Women-Owned Business	86	5.6%
Veteran-Owned Business	23	1.5%
Minority-Owned Business	139	9.1%
Lesbian, Gay, Bisexual, and Transgender Owned Business	12	0.8%
Disability-Owned Business	2	0.1%
Identified as Two or MORE DBE Business Types	105	6.9%
Did not identify as a DBE Business	1,163	76.0%
Total	1,530	100.0%

DBE Statistics Approved Licensees

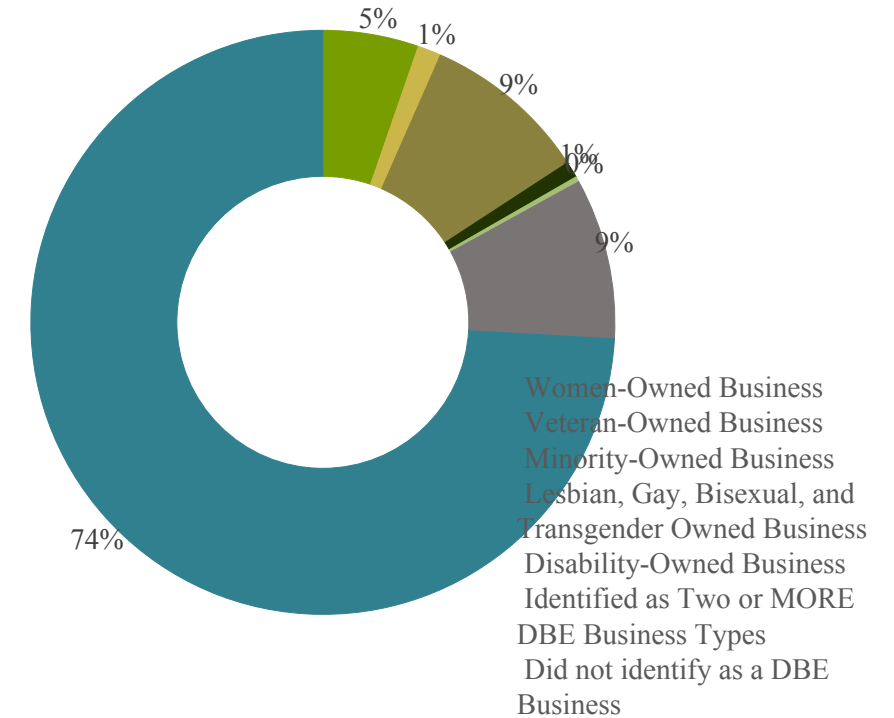


Licensing Applications | November 9, 2023

Disadvantaged Business Enterprise (DBE) Statistics for Pending and Approved License Applications

Type	#	% of Group
Women-Owned Business	96	5.5%
Veteran-Owned Business	27	1.6%
Minority-Owned Business	158	9.1%
Lesbian, Gay, Bisexual, and Transgender Owned Business	14	0.8%
Disability-Owned Business	4	0.2%
Identified as Two or MORE DBE Business Types	137	7.9%
Did not identify as a DBE Business	1,298	74.9%
Total	1,734	100.0%

DBE Statistics for Pending & Approved Lic



Adult Use Agent Applications | November 9, 2023

66,004 Total Agent Applications:

- 159 Total Pending
 - 149 Pending Establishment Agents
 - 10 Pending Laboratory Agents
- 3,206 Withdrawn
- 2,541 Incomplete
- 4,423 Expired
- 34,149 Surrendered
- 6 Denied / 1 Revoked
- 22,628 Active

Of the 159 Total Pending:

- 3 not yet reviewed
- 149 CCC requested more information
- 7 awaiting third party response
- 0 review complete; awaiting approval



Medical Use Agent Applications | November 9, 2023

The total number of MTC agent applications received by status.

MTC Agent Application	#
Pending MTC Agent Applications	7
Pending Laboratory Agent Applications	0
Incomplete	46
Revoked	13
Denied	31
Surrendered	17,277
Expired	2,749
Active	7,492
Total	27,615

