



# December Cannabis Control Commission Public Meeting

In Person and Remote via Teams



## Meeting Book - December Cannabis Control Commission Public Meeting Packet

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December 12, 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

**December 14, 2023  
10:00 AM**

**In Person and 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. Curaleaf Massachusetts, Inc.
  2. Curaleaf North Shore, Inc.
  3. Curaleaf Processing, Inc.
  4. Ganesh Wellness, Inc.
  5. In Good Health, Inc.
  6. Nature's Alternative, Inc.
  7. Northeastcann, Inc.
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- VII. Staff Recommendations on Renewal Licenses
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  2. Apothca, Inc. (#MRR206706)
  3. Aries Laboratories LLC (#ILR267926)
  4. Aspen Blue Cultures Inc. (#MPR243919)
  5. Aspen Blue Cultures Inc. (#MCR140403)





6. ATOZ Laboratories, Inc. (#ILR267930)
7. Aunty Budz LLC (#MBR169322)
8. Aura Cannabis Company LLC (#MCR140557)
9. Aura Cannabis Company LLC (#MRR206637)
10. BB Botanics LLC (#MRR206661)
11. BB Botanics LLC (#MCR140615)
12. Cannabis Connection, Inc (#MRR206686)
13. Caregiver-Patient Connection (#MCR140616)
14. Caregiver-Patient Connection LLC (#MCR140617)
15. Community Growth Partners Northampton Operations LLC (#MCR140587)
16. Coyote Cannabis Corporation (#MCR140600)
17. Coyote Cannabis Corporation (#MPR244079)
18. D2N2, LLC (#MRR206675)
19. dba EMJ LLC (#MCR140610)
20. Emerald City Growers Incorporated (#MCR140368)
21. Four Trees Holyoke LLC (#MRR206660)
22. Four Trees Holyoke LLC (#MCR140634)
23. Gibby's Garden LLC (#MBR169323)
24. Good Chemistry Nurseries of Massachusetts, LLC (#MPR244014)
25. Good Chemistry Nurseries of Massachusetts, LLC (#MCR140527)
26. Green Adventure LLC (#MRR206678)
27. Green Era LLC (#MRR206685)
28. Green Era LLC (#MRR206689)
29. Green Era LLC (#MRR206682)
30. Greencare Collective LLC (#MRR206666)
31. Highdration LLC (#MPR244067)
32. Holland Brands NA, LLC (#MRR206672)
33. Hudson Botanical Processing, LLC (#MPR244078)
34. Infused Element, LLC (#MPR244095)
35. J&L Enterprises, Inc. (#MCR140622)
36. KG Collective Brockton, LLC (#MRR206619)
37. KindRun Massachusetts, LLC (#MDR272557)
38. KRD Growers, LLC (#MRR206704)
39. KRD Growers, LLC (#MCR140637)
40. KRD Growers, LLC (#MPR244100)
41. Mass Yield Cultivation LLC (#MCR140543)



42. Matriline Farms LLC (#MCR140631)
43. Matriline Farms LLC (#MPR244099)
44. Mint Retail Facilities LLC (#MRR206680)
45. Mission MA, Inc. (#MRR206500)
46. Mission MA, Inc. (#MRR206501)
47. Mission MA, Inc. (#MCR140522)
48. MMM Transport, Inc. (#MTR263111)
49. Nature's Alternative, Inc. (#MRR206691)
50. New Leaf Enterprises, Inc. (#MRR206632)
51. New Leaf Enterprises, Inc. (#MRR206622)
52. Pepperell Roots, LLC (#MCR140614)
53. Pepperell Roots, LLC (#MPR244077)
54. PharmaCannis Massachusetts, Inc. (#MRR206670)
55. Prime Tree LLC (#MCR140584)
56. Prime Tree LLC (#MPR244069)
57. QPS Massachusetts Holdings LLC (#MPR244038)
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59. Reverie 73 Beverly LLC (#MRR206676)
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  4. New England Organics, LLC (#MRN281936), Retail
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- IX. Staff Recommendations on Final Licenses
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  2. Charles River Remedies, LLC (#MR283511), Retail
  3. Grass Appeal, LLC (#MC282123), Cultivation, Tier 3 / Indoor
  4. Green Flash Delivery, LLC (#MD1298), Marijuana Delivery Operator
  5. Health Circle, Inc. (#MC281787), Cultivation, Tier 2 / Indoor
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  10. Sweetgrass Botanicals, LLC (#MP282058), Product Manufacturing
  11. Sweetgrass Botanicals, LLC (#MR284185), Retail
  12. Theory Wellness, Inc. (#MR284150), Retail
  13. Twisted Growers, LLC (#MC281714), Cultivation, Tier 11 / Indoor
  14. Twisted Growers, LLC (#MP281909), Product Manufacturing
  15. Union Twist, Inc. (#MR284038), Retail
  16. Grass Appeal, LLC (#MTC3770), Vertically Integrated Medical Marijuana Treatment Center
  17. Green Gold Group (#MTC3831), Vertically Integrated Medical Marijuana Treatment Center
- X. Commission Discussion and Votes
1. Regulatory Review Discussion: Delivery License Type
  2. COVID Administrative Orders
  3. FY 2025 Budget Request
  4. CY 2023 Secretary's Report
  5. Job Description: Director of Operations
- XI. New Business Not Anticipated at the Time of Posting
- XII. Next Meeting Date
- XIII. Adjournment



\*Closed captioning available



CANNABIS CONTROL COMMISSION

September 18, 2023  
10:00 AM

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

PUBLIC MEETING MINUTES

**Documents:**

- [Meeting Packet](#)
- Statement by Chair Donahue

**In Attendance:**

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

**Minutes:**

1) Call to Order

- Commissioner Roy recognized a quorum and called the meeting to order.
- Commissioner Roy gave notice that the meeting is being recorded.
- Commissioner Roy gave an overview of the agenda.

2) Commissioners' Comments and Updates – 00:01:05

- Commissioner Camargo expressed her excitement for the day's proceedings and noted that it is the culmination of years of work.
- Commissioner Concepcion concurred. She thanked those who provided testimony during the public hearing or in writing.
- Commissioner Stebbins thanked those who submitted feedback during and prior to the public comment period. He expressed his eagerness to deliberate and arrive at a final draft of the regulations.
- Commissioner Roy thanked stakeholders for their feedback. She reiterated the objective of the meeting.
- Acting General Counsel Andrew Carter (AGC Carter) explained that the body is compelled to vote on and adopt an Acting Chair (AC) in Chair O'Brien's absence.
  - Commissioner Roy responded that, per statute and precedent, it is the Secretary that serves as AC.
  - AGC Carter replied that an AC can either be designated by the sitting Chair or



- by the Commission as a body. He cited M.G.L., c. 94G § 4.
- Commissioner Roy explained her role as Secretary of the Commission and as Appointed Officer. She noted that historically there has been no objection to the Secretary serving as the AC.
  - AGC Carter responded that in previous instances the sitting Chair designated the AC, which has not occurred, and therefore the body needed to designate one to conduct the meeting.
  - Commissioner Roy asked AGC Carter if Chair O'Brien had been removed from her position.
  - AGC Carter replied that, as far as he was aware, she had not.
  - Commissioner Roy remarked that in light of this, it can be inferred that Chair O'Brien continues to hold the position of Chair.
  - AGC Carter responded that Chair O'Brien was not currently exercising her authority as Chair.
- Commissioner Roy ruled AGC Carter's proposition as being out of order of the agenda. She noted that she intended to proceed with the public meeting as the AC.
  - Commissioner Camargo acknowledged the delicacy of the situation. She echoed AGC Carter's statement that the body has the power and authority to select an AC.
    - Commissioner Roy asked Commissioner Camargo to cite the statute supporting her assertion.
    - AGC Carter quoted M.G.L., c. 94G § 4(a).
  - Commissioner Stebbins moved that the Commission appoint the Secretary as Acting Chair for the purposes of the regulatory review meeting.
  - Commissioner Roy seconded the motion.
  - Commissioner Camargo thanked Commissioner Roy for her service as AC the previous meeting. She indicated that she does not support her continuing in that role. She noted her intention to raise a counter motion.
  - Commissioner Stebbins clarified that the motion is intended to establish an AC in the short term to direct and oversee the remainder of the regulatory review efforts. He further clarified his intention and the role of the AC. He advocated for keeping with precedent in the interest of time.
  - Commissioner Roy read a passage from the Commission's Code of Ethics.
    - Commissioner Concepcion asked to clarify why the passage was being entered into the record.
    - Commissioner Roy replied that it was being entered into the record as a reminder of the heightened ethical standards to which they are held as Commissioners.
    - Commissioner Concepcion asked a clarifying question about how ethics related to the topic at hand.
    - Commissioner Roy explained that her intention is to extend a reminder of the Commission's expectations around ethics as the body navigates unprecedented circumstances and continued to read the Enhanced Code of Ethics.
  - Commissioner Stebbins clarified the intent of the motion and the function of an AC.
  - Commissioner Roy took a roll call vote:



- Commissioner Camargo – No
- Commissioner Concepcion – No
- Commissioner Roy – Yes
- Commissioner Stebbins – Yes
- The Commission denied the motion by a vote of two in favor and two opposed.
- Commissioner Camargo moved to designate Commissioner Concepcion as Acting Chair until the return of the Chairperson.
- Commissioner Concepcion seconded the motion.
- Commissioner Stebbins reiterated that he raised a motion to appoint Commissioner Roy as the AC based on precedent. He noted that Commissioner Concepcion is part of three working groups. He raised the question of how she intends to manage conducting the meeting while contributing to the discussion of such varied policy matters.
  - Commissioner Concepcion responded that her deep involvement with the subject matter will allow her to better facilitate the proceedings.
- Commissioner Stebbins asked Commissioner Camargo if she would be willing to amend her original motion to limit Commissioner Concepcion’s designation as the AC to the regulatory review period.
  - Commissioner Camargo asked Commissioner Stebbins to clarify the rationale behind his request.
  - Commissioner Stebbins recognized the breadth of knowledge that Commissioner Concepcion would bring to the role. He expressed reservation about designating Commissioner Concepcion as the AC beyond the regulatory review period with the state of the Chair seat in question.
  - Commissioner Camargo acknowledged the precariousness of the situation and underscored her confidence in Commissioner Concepcion’s leadership. She declined to amend her motion.
- Commissioner Roy explained that she was unanimously appointed Secretary by the body and that it was likewise agreed upon that the Secretary would serve as AC in the absence of a Chair. She added that she has served in this capacity six times prior with no objection. She asked Commissioner Camargo to clarify the nature of her objection.
  - Commissioner Camargo declined to elaborate.
- Commissioner Roy reiterated that she has served as the AC six times prior without objection. She asked Commissioner Camargo again to clarify the nature of her objection.
  - Commissioner Camargo recognized Commissioner Roy for her service as the AC during the previous meeting. She suggested that Commissioner Concepcion may be better equipped to meet the demands of the regulatory review process and surrounding circumstances. She added that appointing an AC is at the discretion of the body.



- Enforcement Counsel Rebecca Lopez (EC Lopez) raised the question of whether the day’s regulatory work could be legally challenged if an AC is not appointed in a manner consistent with the statute.
  - AGC Carter responded affirmatively that it would leave the Commission vulnerable to the risk of legal challenge.
- EC Lopez advised that the matter of appointing an AC is resolved before proceeding with any regulatory efforts.
- Commissioner Stebbins indicated that he would likely vote against the current motion. He added that he would in turn raise a new motion that would limit Commissioner Concepcion’s service as the AC to the regulatory work of the current week’s public meetings, after which time another vote would be required.
- Commissioner Roy took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Concepcion – Yes
  - Commissioner Roy – No
  - Commissioner Stebbins – No
- The Commission denied the motion by a vote of two in favor and two opposed.
- Commissioner Stebbins moved to appoint Commissioner Concepcion as the Acting Chair for the purposes of conducting the next three regulatory review and meetings as currently noticed.
- Commissioner Concepcion seconded the motion.
- Commissioner Roy took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Concepcion – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
- The Commission unanimously approved the motion.

Commissioner Camargo moved to take a ten-minute recess.

- Commissioner Stebbins seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved taking a ten-minute recess, returning at 10:50 AM (00:50:15)

### 3) Commission Discussion and Votes – 00:50:15

#### 1. Draft Adult Use and Medical Use of Marijuana Regulations





- AGC Carter provided an overview of the regulatory review process. He stated that the Commission’s review would begin with 935 CMR 500.002. He opened the discussion to proposed amendments and debate.
- Commissioner Camargo raised the question of whether guidance needed to be provided around the term Reasonably Related, both for municipalities and industry professionals.
  - EC Lopez responded that the definition as written in 500.002 serves as the agency’s interpretation of “Reasonably Related”. She commented that guidance may be helpful for providing concrete examples.
  - Commissioner Camargo opined that the definition as written leaves too much room for interpretation.
  - EC Lopez replied that the Host Community Agreement (HCA) working group identified several examples of what would constitute “Reasonably Related” but did not incorporate them into the regulatory language as to not be overly prescriptive.
- The AC invited Director of Licensing Kyle Potvin (DOL Potvin) to comment.
- DOL Potvin concurred with EC Lopez. He noted that there is currently a guidance document on HCAs available to the public but will likely need to be revised following promulgation.
- Commissioner Camargo asked to clarify what procedural means the Commission must designate an expense as not “Reasonably Related”.
  - AGC Carter suggested that the matter be revisited as part of the discussion of 500.180(4)(c).
  - EC Lopez added that the legislature granted the Commission the authority to establish criteria for reviewing, certifying, and approving Community Impact Fees (CIF).
- Commissioner Roy proposed including concrete examples of unreasonably related expenses within the guidance document.
  - EC Lopez concurred.
- The AC asked if Commissioner Camargo was recommending a change to the language.
  - Commissioner Camargo responded that she was not proposing a change to the language.
  - The AC noted a consensus on revising the guidance around Reasonably Related fees.
- AGC Carter asked if there were any additional proposed edits to 500.002.
- Commissioner Stebbins noted that he would like to revisit the definition of Host Community Agreement Waiver later in the discussion.
- Commissioner Roy raised the question of expanding the language around the definition of “Model Host Community Agreement” to reflect that municipalities can execute the Model.



- EC Lopez concurred. She recommended adding that an HCA that conforms to the Model HCA is deemed compliant. She further recommended adding clarifying language that an HCA that conforms to the Model HCA is a separate agreement that the parties can negotiate and execute. She proposed regulatory language including “signed and executed by the parties.”
- EC Lopez suggested a modification to the definition of Local Approval Process to reflect that the Commission has the sole authority to issue licenses to Marijuana Establishments (ME) and Marijuana Treatment Centers (MTC) and that there is not a separate local license.
  - The AC suggested using a word other than “licensing” to convey the municipal-level approval process.
  - AGC Carter proposed the word “permitting”.
  - The AC noted a consensus on replacing the word “licensing” with “permitting” in the definition of Local Approval Process.
  - AGC Carter reviewed the amended definition.
  - Commissioner Stebbins proposed further amending the definition to establish more clearly what the Local Approval Process is in practice.
  - EC Lopez offered language.
- Commissioner Camargo recommended establishing “Equity Participant” as a defined term to encompass Equity participants who are not operators.
  - The AC asked Commissioner Camargo to clarify how the proposed term is distinct from Social Equity Program Participant (SEPP) or Economic Empowerment Priority Applicant (EEPA).
  - Commissioner Camargo explained that her concept is for a designation that allows for the participant to become certified year-round in the same vein as Social Equity Businesses (SEB).
  - The AC asked Commissioner Camargo to provide an example of when this designation might be utilized.
  - Commissioner Camargo explained that currently, a qualifying Equity Participant would have to wait for the start of a new Social Equity Program (SEP) cohort to receive the SEP participant designation and access any related benefits. She noted that the proposed concept would allow qualifying ancillary businesses to become certified at any time.
  - The AC asked to clarify if the purpose of the concept is to create opportunities for SEP-qualifying Equity participants in the intervening time between SEP cohort application windows.
  - Commissioner Camargo responded affirmatively.
  - AGC Carter offered to discuss and help further develop the concept with Commissioner Camargo at a later time.
- Commissioner Roy expressed concern around some of the qualifying language in the definition of Community Impact Fee to potentially prohibit “unquantifiable, generalized expenses, good faith estimates, general impacts, and prorated impacts.”
  - EC Lopez identified the language to be serviceable as written. She invited Commissioner Roy to restate her concerns during the regulatory discussion of



CIFs.

- The AC asked for any further questions or comments.
- AGC Carter identified edits to the language of 500.032. He noted that the edits have been made largely to ensure that the suitability tables are congruent with Chapter 180.
- Commissioner Roy asked if social consumption is in scope.
  - AGC Carter responded that it is, to the extent of the Pilot Program.
  - Commissioner Roy asked to clarify if the changes to the Pilot Program will be submitted for promulgation.
  - AGC Carter replied affirmatively.
- AGC Carter identified an edit to the language of 500.050(6)(a). He noted that the edit represents the effectuation of the body's decision to remove the Pilot Program.
- The AC asked for any questions or comments.
- AGC Carter identified an edit to the language of 500.101(1)(a)(8).
  - Commissioner Stebbins noted that language may need to be introduced to the section pertaining to an HCA Review Waiver.
  - AGC Carter indicated that he would flag the matter for revisiting.
- Commissioner Roy asked to clarify if there is a need to insert language concerning a Model HCA.
  - EC Lopez stated that the language refers to the agreement that the parties have made. She added that a Model HCA may inform the agreement but will not in and of itself be the HCA for the business and municipality.
- AGC Carter identified the addition of new language to 500.101(1)(a)(11).
- Commissioner Roy asked if the Commission would be working with the Social Equity Trust Fund to provide guidance to licensees around the available means of contributing to the fund.
  - AGC Carter expressed his support of the idea. He suggested there may be a need to provide clarity around compliance as well.
- AGC Carter identified edits to the language of 500.101(2)(a).
- The AC asked for questions or comments.
- Commissioner Camargo noted the correlation between the language and her proposed concept of an Equity Participant designation.
- The AC provided additional context about the HCA working group's thinking behind the pre-certification concept and regulatory language.
- Commissioner Stebbins raised the question of whether the Commission's definition of Social Equity Business is in alignment with that of Chapter 180.
  - EC Lopez clarified that the definitions are not in conflict. She offered context around the nuances of the language.
- AGC Carter identified an edit to the language of 500.101(2)(f)(3).
  - DOL Potvin noted that the language has been updated to reinforce that once an applicant is pre-certified, they will advance to the provisional license phase only when their application is deemed complete, as with non-EEP/SEP applicants.
  - Commissioner Roy raised the question of why the language refers to an application being deemed complete but not approved or denied.



- DOL Potvin cited 500.101(2)(a).
- Commissioner Roy clarified that the phrase “subject to Commission approval or denial” did not need to be added to the language.
- DOL Potvin responded that the addition was not needed.
- The AC provided additional context about the procedural distinction between a complete application and an approved application.
- Commissioner Roy suggested adding the language, “subject to Commission approval or denial”. She expressed that the language as written may lead to confusion.
- The AC invited the group to comment.
- DOL Potvin acknowledged the potential for confusion. He added that there has historically been confusion around the subject. He offered further information about the process of deeming an application complete and the efforts to mitigate any confusion.
- Commissioner Roy proposed adding language to convey that once an application is deemed complete, the Commission reserves the right to approve or deny the pre-certification. She elaborated on her concerns that applicants may conflate a complete application with an approved application.
- DOL noted that 501.102(1)-(2) might be a more logical place for incorporating additional language.
- The AC asked Commissioner Roy if she had language to propose.
- Commissioner Roy offered language.
- EC Lopez commented that the proposed language is acceptable but that she is unsure of the appropriate place for it.
- The AC echoed EC Lopez’s comment. She asked Commissioner Roy for input about where the language would best fit within the regulations.
- Commissioner Roy deferred to EC Lopez.
- EC Lopez stated that she would consult with the Legal department to determine the best fit.
- Commissioner Stebbins offered language. He proposed that be included in 500.101(2)(f)(3).
- EC Lopez expressed support of the language and placement.
- The AC asked for questions or comments.

Commissioner Roy moved to take a five-minute recess.

- Commissioner Camargo seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes



- Acting Chair Concepcion – Yes
- The Commission unanimously approved taking a five-minute recess, returning at 12:05 PM (02:05:44).
- AGC Carter identified an edit to the language of 500.101(2)(g)(9)(b).
  - Commissioner Stebbins noted that language may need to be introduced to this section pertaining to an HCA Review Waiver.
- The AC asked for any further questions or comments.
- AGC Carter identified an edit to the language of 500.101(2)(g)(9)(d).
- The AC asked for questions or comments.
- AGC Carter identified edits to the language of 500.101(4)(a).
  - Commissioner Roy raised the question of whether it may be necessary to incorporate language about the possible denial of an application to help prevent any confusion, as with 500.101(2)(f)(3).
  - Commissioner Camargo noted a statement submitted by Daniel Donahue, House Chair of the Joint Committee on Cannabis Policy, regarding the section in question. She suggested that the body take a moment to review it before proceeding.
  - The AC proposed reviewing the statement over the lunch break.

Commissioner Camargo moved to take a forty-five-minute recess for lunch and to review the correspondence by Chair Donahue.

- Commissioner Roy seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved taking a forty-five-minute recess, returning at 1:00PM (2:58:30).
- The AC called the meeting back to order. She formally recognized the statement by Chair Donahue. She added that Chair Donahue has been an invaluable ally in the creation and formation of Chapter 180. She read the statement aloud. She called for a motion to enter the statement into the record.
- Commissioner Stebbins moved to enter Chair Donahue’s submitted statement into the record.
- Commissioner Roy seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved entering the statement into the record.



- The AC asked for questions or comments.
- EC Lopez proposed changing the term “Verification” to “Pre-Verification” in the section title to offer clarity around the fact that these are individuals who are not yet SEBs in statutory terms but are seeking formal verification of their eligibility. She offered language.
  - The AC proposed additional clarifying edits to the language. She asked EC Lopez to read the section aloud with the proposed edits.
  - Commissioner Roy asked if the language should be amended to encompass verified individuals as well as pre-verified individuals.
  - DOL Potvin in turn asked to clarify if the intent of the body is to promulgate regulations that effectively allow the Pre-Verification process to apply to marijuana establishment applicants and not a business that has already been licensed.
  - The AC concurred.
  - DOL Potvin recommended highlighting that Pre-Verification can occur prior to licensure.
  - Commissioner Roy proposed language to clarify that the language pertains to SEB applicants.
  - Commissioner Stebbins raised concerns about conflicting language.
  - EC Lopez offered alternative language.
  - The AC identified edits to the language of 500.101(4)(b).
  - Commissioner Roy asked to confirm that an entity can be designated an SEB.
  - The AC responded affirmatively.
  - Commissioner Roy suggested amending the language to reflect that both individuals and entities can be designated as SEBs and adding the term Pre-Verification throughout.
  - The AC asked for additional questions or comments.
  - EC Lopez noted that while Pre-Verification is term defined in the regulations, the body is not restricted from using the word in other ways and applications, as long as it is not capitalized.
- The AC asked AGC Carter to read subsections (a) and (b) aloud.
  - EC asked to clarify the policy intent.
  - The AC clarified the intent.



- EC Lopez suggested that both subsections (a) and (b) may not be needed then.
- The AC concurred.
- EC Lopez urged the body to determine if the language of the section is intended to encompass solely non-licensed contingent or also EEP/SEP licensees.
- The AC noted that the intention of the working group was to encompass both.
- Commissioner Roy raised the question of a third group: EEP/SEP participants who are not licensed.
- The AC noted that those individuals would be encompassed under Pre-Certification which is distinct from Pre-Verification.
- DOL Potvin offered further context.
- Commissioner Stebbins cautioned against convoluting the matter. He proposed that language intended to encompass the third group be revisited during the Municipal Equity discussion.
- EC Lopez offered clarifying language to subsection (b).
  - The AC asked for any further questions or comments.
  - Commissioner Roy asked if the language addresses Chair Donahue’s question around how the applicants “stand to benefit”.
  - The AC responded that the question will be addressed during their discussion of the language around Municipal Equity.
- AGC Carter identified edits to the language of 500.101(4)(c).
  - EC Lopez raised the question of what group subsection (c) is intended to address.
  - The AC indicated that the language is meant to address any individual that no longer satisfied the established criteria.
  - Commissioner Stebbins expressed that there may be a need to elaborate on what may constitute a material change.
  - The AC explained that the working group’s rationale for not elaborating was that there is similar language in the existing regulations that speaks to material change.
  - DOL Potvin elaborated on what is encompassed by “material change” under subsection (c), specifically. He discussed how it has and may be interpreted in other contexts.
  - EC Lopez added that material change as a compliance standard can be found in 500.102(1)(e). She quoted the regulation.
  - Commissioner Stebbins recommended inserting clarifying language to underscore the consequentiality of the material change.
  - The AC proposed qualifying language.
  - Commissioner Roy asked how the language accounted for the discovery of untruthfulness with regards to material change.
  - EC Lopez noted that the untruthful submission of information qualifies as a material change standard.
  - DOL Potvin reflected on Commissioner Stebbins’ concerns and offered suggestions of terms to use in lieu of a “material change”.





- AGC Carter shared proposed language.
- Commissioner Roy expressed objection to the term “qualifying condition”. She opined that it may be conflated with the defined term Qualifying Condition as it relates to the Medical-Use program.
  - EC Lopez proposed the term “qualifying criteria”.
  - Commissioner Stebbins suggested an edit to simplify the language.
- Commissioner Roy asked a clarifying question about when the term Pre-Certified is used versus Pre-Verified.
  - DOL Potvin expressed concern about differentiating the processes. He recommended limiting the language to Pre-Verification and Verification to help thwart confusion.
  - EC Lopez concurred. She proposed clarifying amendments to the language of subsection (a).
- The AC asked for any questions or comments.
- AGC Carter identified edits to the language of 500.101(4)(d).
  - Commissioner Camargo asked to clarify the function of the subsection.
  - DOL Potvin responded that there is a requirement in Chapter 180 to notify the Department of Revenue (DOR) of those businesses that qualify as SEBs. He added that the term carries two definitions within Chapter 180. He provided and overview of the distinctions.
- The AC asked for any questions or comments.
- AGC Carter identified edits to the language of 500.102(1)(d).
- The AC asked for any questions or comments.
- AGC Carter identified edits to the language of 500.102(4).
- The AC asked for any questions or comments.
- Commissioner Stebbins asked if the language in subsection (4)(f), requiring a marijuana establishment to request an invoice from its Host Community, will apply under the new regulations around the verification of HCAs.
  - DOL Potvin opined that the language in subsection (4)(f) is redundant and proposed that it be stricken.
  - The AC noted a consensus to strike subsection (4)(f).
- AGC Carter identified an edit to the language of 500.105(1)(m)(3).
- The AC asked for questions or comments.

Commissioner Roy moved to take a ten-minute recess.

- Commissioner Camargo seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved taking a ten-minute recess, returning at 2:50PM (4:50:13).
- AGC Carter introduced 500.180. He reviewed subsection (1).





- The AC expressed that she would like to take the opportunity to highlight that the effective date of Chapter 180 was November 9, 2022.
- AGC Carter reviewed 500.180(2)(a)-(b).
- The AC asked for questions or comments.
- AGC Carter reviewed subsection 500.180(2)(c)1.
- Commissioner Roy explained that since one party of an HCA is a municipality, it is considered a municipal contract and therefore falls under the purview of the Comptroller. She suggested replacing the language of subsection (2)(b) with that from the Policies and Procedures of the Office of the Comptroller.
- Commissioner Camargo proposed striking subsections (2)(a)-(c). She opined that it gave the perception of offering unchecked power to Chiefs of Police to sign off on HCAs.
  - DOL Potvin expressed objection to broadly striking subsections (a)-(c). He noted that subsection (a) in particular is consistent with the existing, unchanged law.
  - EC Lopez clarified for the record that the process involving Chiefs of Police is initiated only when a licensee is seeking the waiver of a security requirement.
- Commissioner Stebbins raised the question of how the language of (2)(c) interplays with CIFs.
- AGC Carter responded that ultimately it would be a compliance determination as well as a policy decision for the board to contemplate. He added that the language as written does seem to allow for some discretion on the part of the agency.
- The AC asked Commissioner Stebbins to clarify his concerns and whether he is in agreement with Commissioner Camargo that the language should be stricken.
  - Commissioner Stebbins expressed support of Commissioner Camargo's argument. He echoed her concern about undue financial burden on licensees and noted that the Commission retains the authority to contest the suitability and reasonable relatedness of a condition. He raised the question of whether striking the language would impede the ability of a community to be innovative in its approach to Agreements.
- The AC asked Commissioner Camargo to elaborate on her concerns.
  - Commissioner Camargo opined that the current language may offer municipalities disproportionate leverage.
  - Commissioner Roy countered that the language introduces safeguards to avoid that.
  - The AC concurred.
  - Commissioner Camargo thanked Commissioner Roy for the added perspective. She suggested inserting conditions as a compromise. She offered suggested language. She reiterated her concerns about municipalities imposing undue financial burden on businesses.
  - The AC noted that the language provided by Commissioner Camargo appears to be effectively a combination of subsections (a) and (d). She asked Commissioner Camargo to restate her position.



- Commissioner Roy noted Commissioner Camargo’s concerns seem to revolve around CIFs and arbitrary fees. She added that the Commission will be privy to the terms of all HCAs going forward. She expressed that the proposed language may be duplicative.
- Commissioner Stebbins stated that per the language of subsection (c)(2) necessitates that both parties will enter into the HCA in mutual agreement with the terms.
- Commissioner Camargo noted that the proposed language adds an extra layer of protection. She cited anecdotal reports of predatory contracts as told during the public hearing session.
- Commissioner Roy voiced that those contracts were entered into during a period where there was no Commission oversight.
- The AC proposed tabling the matter.
- Commissioner Stebbins elaborated on his position.
- EC Lopez noted that Commissioner Camargo’s proposed language could present an enforceability challenge as it repeats the non-cannabis business condition which could invite unwanted lines of inquiry. She elaborated on the distinction between reasonableness standards and “reasonably related”.
- Commissioner Roy opined that the phrase “good faith estimate” is conceptually at odds with Chapter 180.
- Commissioner Camargo noted that the proposed language is a starting off point. She reiterated the need for safeguards.
- The AC raised the question of whether to table the matter or establish a position before proceeding.
- Commissioner Stebbins proposed tabling the matter pending the discussion on CIFs.
- The AC noted a consensus on tabling the matter.
- The AC asked for questions or comments regarding 500.180(2)(c)(2)e-g.
  - Commissioner Roy proposed exchanging the language of subsection (2)(f) with that around municipalities and contracts from M.G.L., c. 40 § 4.
  - EC Lopez asked if Commissioner Roy wanted to include the entirety of the language or just a portion of it.
  - Commissioner Roy responded that she would like to fully incorporate the language because it is more comprehensive.
  - EC Lopez offered a recommendation on how to incorporate the language.
  - The AC raised the question of whether to leave or strike subsection (f).
  - DOL Potvin explained that laws are sometimes in conflict. He therefore proposed alternative language to target conditions “inconsistent with any previous or conflicting provision of any general or special law”. He opined that the language requires additional specificity. He expressed concern that it otherwise may be inconsistent with existing case law.
  - Commissioner Roy asked if that could be addressed by amending the language to subsection (f) by injecting the phrase “previous or current law”.
  - DOL Potvin recommended the “precedent law” or “current established law”.



- AGC Carter asked DOL Potvin to expound on his concerns.
- DOL Potvin provided a supporting example and emphasized that additional clarity is required.
- EC Lopez offered alternative language.
- Commissioner Stebbins asked to clarify if there is any distinction between “agreement” and “contract” in this context. He noted that the Office of the Comptroller deals in the provision of goods, etc. He raised the question of whether the intent of their chosen language may be asynchronous with the policy objective.
- Commissioner Roy noted that “contract” is used in this instance as a verb and not a noun.
- The AC noted a consensus on the language. She asked for further questions or comments.
- The AC reviewed 500.180(2)(c)(3)-(5). She asked for questions or comments.
- The AC reviewed 500.180(2)(d)-(e).
- Commissioner Stebbins raised the question of whether “good compliance standing” should be defined.
  - EC Lopez advised against the Commission establishing a definition so as not to limit itself. She noted that it is generally defined as being in compliance with the regulations.
- Commissioner Camargo raised the question of what approval of HCAs means in the context of subsection (e).
  - The AC responded that approval in this context refers to the Commission’s approval of the HCA.
  - EC Lopez concurred. She added that it is conditioned on good compliance standing. She offered an example.
- The AC reviewed 500.180(2)(f)-(h).
- Commissioner Stebbins recommended striking the verbiage regarding a name change.
  - DOL Potvin acknowledged the burden of renegotiating a contract as the result of a name change. He added that contracts are agreements between named parties. He further added that, technically speaking, the only change required on the contract is the name change, though that route may conceivably lead to enforceability issues.
  - Commissioner Roy asked if a Change of Name Agreement could function in lieu of a new HCA.
  - DOL Potvin noted that an amendment to the HCA would be required at the very minimum, with both parties signing off.
  - The AC stated that the language does allow a “new or amended HCA”.
- Commissioner Stebbins proposed amended language for subsection (h) regarding a change of location within the same municipality.
  - Commissioner Camargo advocated for simplifying the language wherever possible.
  - EC Lopez added that a guidance document can be provided for simple name changes.



- Commissioner Stebbins maintained his concerns.
- Commissioner Camargo asked Commissioner Stebbins for an alternative option.
- Commissioner Stebbins proposed adding the language, “location change within the municipality”.
- DOL Potvin clarified that even with a simple name change amendment, the HCA becomes a new contract. He acknowledged that the language is not intuitive.
- The AC expressed support of EC Lopez’s name change guidance document recommendation. She asked Commissioner Stebbins how he would like to proceed.
- Commissioner Stebbins responded that he would like to ensure the language does not suggest that anyone seeking a name change will have to pursue a new HCA. He asked DOL Potvin if there is a need to offer guidance around whether a legal name change or name change request to the Commission should come first.
- DOL Potvin responded that under the new regulations the updated HCA would be required first, and the name change would be administrative on the part of the Commission.
- Commissioner Roy asked DOL Potvin if a name change constitutes a change of ownership.
- DOL Potvin responded that currently they are separate processes.
- Commissioner Stebbins again proposed adding the language, “location change within the municipality” to help thwart any confusion among licensees.
- EC Lopez noted that the intention of the HCA working group was to cover any change of location even within the same municipality. She offered to conduct additional legal assessment.
- DOL Potvin noted that this topic is especially important in larger municipalities.
- Commissioner Roy asked about the process to change the license type of an HCA.
  - DOL Potvin noted that per subsection (4), an HCA must specify the license operations permitted under the terms.
  - Commissioner Roy asked if a change in license operation would require an amendment.
  - DOL Potvin discussed the protocol in that instance.
- Commissioner Roy asked what would prevent a business from switching or adding license operations directly upon licensing or renewal.
  - DOL Potvin responded that licensees are required to ensure that the agency is up-to-date or risk compliance issues.
  - EC Lopez reflected on the controls, regulatory systems, and safeguards the agency has set in place.
  - The AC noted a consensus on the language as written.
- The AC reviewed 500.180(2)(i).
- Commissioner Roy proposed language for subsection (5).



- The AC noted a consensus on the language.
- The AC reviewed 500.180(2)(j)(1)-(3).
- Commissioner Roy asked the AC if the Department of Revenue submitted commentary.
  - The AC noted that it seemed their interpretation of the language was not consistent with the intent. She read the comment into the record.
  - DOL Potvin concurred with the ACs analysis. He added that their position is more applicable to Municipal Equity under 500.181.
- The AC reviewed 500.180(2)(j)(4).
  - Commissioner Roy asked if this is the appropriate area for inserting her proposed language for subsection (5) around what is excluded as an acceptable CIF.
  - EC Lopez noted that it could be included here as a new subsection or under the General Requirement section under CIFs.
- Commissioner Roy asked how generalized costs are identified unless a licensee submits a complaint.
  - The AC stated that the body will revisit the matter.
- The AC reviewed 500.180(2)(j)(6). She asked for questions or comments.
- Commissioner Roy noted for the public that she is seeking assurance that contractual vehicles such as Memorandums of Assurance (MOA), Memorandums of Understanding (MOU), etc. would be prohibited under the new regulations.
  - EC Lopez noted that the statute indicates HCAs will include all stipulations and responsibilities between the parties.
  - DOL Potvin concurred. He added that MOAs, MOUs, etc. could hypothetically be considered as part of the HCA, as they contain responsibilities and stipulations.
  - Commissioner Roy asked DOL Potvin to expound on his statement on MOAs and MOUs.
  - DOL Potvin noted that the possibility cannot be ruled out with certainty as a matter of law.
- The AC asked for questions or comments.

Commissioner Camargo moved to take a ten-minute recess.

- Commissioner Roy seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Concepcion – Yes
- The Commission unanimously approved taking a ten-minute recess, returning at 5:15PM (7:13:47).
- The body discussed the possibility of convening on Thursday, September 21, 2023.
- The AC reviewed 500.180(2)(j)(7)-(8). She asked for questions or comments.



- Commissioner Roy asked to clarify that the language around charitable contributions in subsection (8) and whether that encompasses contributions directly to municipalities.
  - Commissioner Stebbins noted that a monetary payment would be covered.

4) Next Meeting Date– 07:21:17

- The Acting Chair noted the next meeting would be on September 19, 2023.

5) Adjournment – 07:20:06

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



September 18, 2023

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

Dear Commissioners,

Thank you for your diligent effort to carry out the intent and spirit of Chapter 180 of the Acts of 2022 in the proposed Adult-Use and Medical Marijuana regulations. The hard work by the Cannabis Control Commission and its staff is evident in the improvements made thus far and in your extensive discussion during public meetings. I am submitting this comment following last week's hearing on the draft regulations to raise observations not addressed by public testimony and to emphasize key considerations. I hope these comments will aid in producing clear regulations that the Commission can administer effectively and efficiently.

Please note that the following comments represent my own observations and not those of the Joint Committee on Cannabis Policy. Further, I am aware that the legislature and administrative agencies have different roles to play, and I offer my comments as part of a good faith effort to advance our mutual goals.

All references to sections of the Code of Massachusetts Regulations are based on the sections as they are numbered in the Draft Regulations released by the Commission on August 16th, 2023.

## I. **Municipal Equity**

### a. Social Equity Businesses

I applaud the Commission in its efforts to ensure that a broad class of licensed businesses and License Applicants is deemed eligible to benefit from the new municipal equity standards set forth by the draft regulations. That said, there is room for improvement.

First, the regulatory definition of Social Equity Business is unnecessarily narrow. 935 CMR 500.002 defines Social Equity Business, in part, as a Marijuana Establishment comprised of at least 51 percent ownership of individuals who are Social Equity *Program Participants*, whereas the statutory definition introduced by Chapter 180 requires a 51 percent majority ownership of individuals *who are eligible* for the Social Equity Program. This discrepancy cuts off a large class of operators from municipal equity simply because their owners have not yet completed a program that, as the Commissioners themselves have acknowledged, is offered only seasonally. This problem can be remedied by simply aligning the Commission's definition of Social Equity Business with the statutory version.

Second, I would like to point out that some sections of the draft municipal equity regulations are difficult to parse. I understand that a new section (7) has been added to 935 CMR 500.101 so that the Commission can verify licensed Marijuana Establishments and certain License Applicants as Social Equity Businesses or Social Equity Businesses “once licensed” as Marijuana Establishments, respectively. I support the Commission’s intention to cast a wider net here. Without a means to designate some License Applicants as “potential” Social Equity Businesses, many of those disproportionately harmed by the prohibition on marijuana would be cut off from municipal equity. Nonetheless, when one reviews 935 CMR 500.181 in its entirety, uncertainties remain over when and how certain classes of entities and individuals stand to benefit.

For example, under 935 CMR 500.181(3), only Social Equity Businesses are included in the presumption, with no mention of entities verified under 935 CMR 500.101(7). Similarly, at 935 CMR 500.181(3)(b)(2)(a), a Host Community is required to encourage applications from businesses and individuals that would meet the definition of Social Equity Business, Social Equity Program Participants, and Economic Empowerment Priority Applicants, again without referencing those entities verified under 935 CMR 500.101(7). In contrast, 935 CMR 500.181(3)(b)(3) requires that a Host Community publish data about its applicant pool, identifying each Social Equity Business and License Applicant that has been designated as a Social Equity Program Participant or Economic Empowerment Priority Applicant, *or who have been pre-verified pursuant to 935 CMR 500.101(7)*. (The term “pre-verified” appears in the municipal equity section for the first time here, confusing matters further.<sup>1</sup>)

The use of the term “equity party” is not introduced until 935 CMR 500.181(4)(a), a section covering equity standards for Host Communities during HCA Negotiations with Social Equity Businesses, License Applicants, and individuals and entities pre-verified by the Commission. “Equity party” includes, among others, individuals and entities pre-verified pursuant to 935 CMR 500.101(7). Including this term earlier in the regulations – or even in the definitions section – and referencing it throughout the municipal equity section could create more consistency with regard to which entities and individuals should be covered by municipal equity policies.

It is imperative that the regulations be comprehensible as a matter of public policy, but in this case, the Commission should be especially mindful of both Social Equity Businesses -- as well as any penumbral entities and individuals -- and smaller municipalities, all of whom want to keep administrative and legal costs to a minimum.

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<sup>1</sup> The term “pre-verification” already exists in the definitions section at 935 CMR 500.002 for an unrelated process, so a new term might be called for.



b. Municipal Equity Presumption

I would like to endorse the inclusion of the presumption added by 935 CMR 500.181(3). With many smaller municipalities having expressed concerns over their ability to comply with the new municipal equity requirements, this presumption would offer a way to satisfy the requirements with less administrative legwork while also ensuring that more Social Equity Businesses are up and running. I would only ask that the means for satisfying the presumption be more clearly expressed, either in the form of publishing model language for a municipal ordinance or by-law, or through more fully fleshing out the requirements.

c. 3% CIF Mandatory Donation

Finally, I would like to respectfully disagree with the Commission's decision to require that 3% of each CIF be donated to the Cannabis Social Equity Trust Fund. The statute and regulations already require that CIFs be reasonably related to the actual costs imposed on a Host Community by a Marijuana Establishment, so requiring that a municipality surrender any portion of those fees seems at odds with the policy goal behind CIFs. My hope is that, as stated during a public meeting, this language was only included as a placeholder.

## II. **Host Community Agreement**

a. Model Host Community Agreement

With recognition that Section 14 (xxxii) of Chapter 180 of the Acts of 2022 empowers, but does not require, the Commission to make available a Model Host Community Agreement, I respectfully suggest that the Commission work swiftly to publish a model agreement as close in time to the final regulations as possible. This would help to allay the concerns of both operators and municipalities as they prepare to comply with the regulations, while also expediting the Commission's future review of HCAs.

Host Communities, Marijuana Establishments, and License Applicants may benefit from access to a Model Host Community Agreement, as it would allow for preparation well ahead of the deadline for compliance. The proposed regulations impose complex requirements containing some areas of ambiguity.<sup>2</sup> Timely publication is especially important for localities with limited staff and financial resources. Further, a clear example of a compliant HCA may reduce instances of deficiency and the need for revision, especially considering that resubmission

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<sup>2</sup> See, e.g., 935 CMR 500.180(2)(5). Considering the critical policy objectives at issue, the use of complex requirements is appreciated and understood, though it underscores the value of providing guidance documents to support the industry in achieving those goals.

requires the operator or License Applicant to wait up to an additional 90 days as the HCA is reviewed again.

Timely publication may also benefit the Commission. Considering the volume of Host Community Agreements which must be reviewed and the timeline the Commission has set to review them, advance guidance could allow for a more efficient review process by staff and prevent need for revision or further action by the Commission. Additionally, considering the novelty and complexity of the HCA requirements, it may be a helpful exercise for the Commission to draft an agreement that complies with the proposed regulations.

b. Equitable Remedies

Under 935 CMR 500.180(3)(c)(5), the Commission has listed potential equitable remedies that may be granted if a Host Community discontinues relations with a Marijuana Establishment, including (i) Extension of a License expiration date without incurring additional prorated fees; (ii) Waiver of a Change of Location fee; and (iii) other equitable relief as determined by the Commission.

Both municipalities and licensees have expressed concerns that the proposed remedies are insufficient. Additional review of this provision may be well advised considering the high-stakes implications for both parties should the listed remedies be applied. For a smaller business, picking up operations and moving to a different location could result in such exorbitant costs that closure would present the more reasonable path forward. For municipalities, the extension of license expiration date may be equally unworkable without a clear provision for expiration or expectation of consequences.

Further discussion of equitable remedies beyond the listed remedies and “other equitable relief” may be well advised to support the parties’ confidence in business and local planning. It may also aid in serving as a clear guide to the Commission and setting transparent expectations for operators and municipalities who find themselves in this position.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "D. M. Donahue".

Daniel M. Donahue

House Chair, Joint Committee on Cannabis Policy

CANNABIS CONTROL COMMISSION

September 20, 2023  
9:00 AM

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

PUBLIC MEETING MINUTES

**Documents:**

- Letter from Charlotte Hanna of Community Growth Partners
- [Meeting Packet](#)

**In Attendance:**

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

**Minutes:**

1) Call to Order

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

2) Commissioners' Comments & Updates – 00:01:09

- Commissioner Camargo noted her general excitement for the day's proceedings.
- Commissioner Roy likewise noted her excitement to continue with the regulatory work at hand.
- The Acting Chair (AC) echoed Commissioners Camargo and Roy's sentiments.

3) Commission Discussion and Votes – 00:01:55

1. Draft Adult Use and Medical Use of Marijuana Regulations

- Acting General Counsel Andrew Carter (AGC Carter) identified edits to the language of 501.180(4)(b)(1-2).
- Commissioner Stebbins asked a clarifying question about a perceived timeline discrepancy in the regulatory language versus Chapter 180 about when Community Impact Fees (CIF) are no longer assessed.
  - The AC clarified that subsection (2) speaks to the collection of CIFs, which is different than the assessment of CIFs.



- Commissioner Roy added that the CIF is assessed for the preceding year.
- Commissioner Camargo expressed that the protocol may lead to confusion among municipalities. She cited an inquiry on the matter by the Massachusetts Municipality Association. She asked if guidance would be provided.
  - The AC confirmed that there will be a guidance document created to offer more context around the regulations more broadly. She added that the word choice is intentional and should be interpreted according to its plain meaning.
  - Director of Licensing Kyle Potvin (DOL Potvin) concurred.
- Commissioner Camargo asked if the provision applies to Marijuana Establishments (ME) and Marijuana Treatment Centers (MTC) alike.
  - Enforcement Counsel Rebecca Lopez (EC Lopez) responded affirmatively.
- Commissioner Camargo asked how long the oldest MTC in the state has been in operation.
  - DOL Potvin responded that the first MTC received their final license in 2014 issued by the Department of Public Health (DPH).
  - EC Lopez noted the statute states two things: that the CIF is no longer effective after eight years of operations and that it cannot begin to be assessed any sooner than the ME/MTC is granted final licensure. CIF commences on the date the ME or MTC is granted a final license.
- AGC Carter identified edits to the language of 501.180(4)(b)(3-4).
- Commissioner Roy raised the question of addressing the assessment of CIFs in contractual vehicles such as Memorandums of Agreement (MOA) and Memorandums of Understanding (MOU).
- Commissioner Camargo stated that she would like to consult with the Legal department on her questions for this section. She requested to raise a motion to recess.
  - The AC obliged.

Commissioner Camargo moved to take a twenty-minute recess.

- Commissioner Roy seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Callender Concepcion – Yes
- The Commission unanimously approved taking a twenty-minute recess, returning at 9:40 AM (00:47:25)
- The AC asked Commissioner Roy for proposed language.
  - Commissioner Roy proposed language.
  - The AC asked for questions or comments.
  - The AC asked EC Lopez to assist with incorporating Commissioner Roy’s proposed language.
  - EC Lopez proposed inserting the language as the first section of subsection (4).



- The AC noted a consensus on the amended language.
- AGC Carter identified edits to the language of 501.180(4)(b)(5-6).
- AGC Carter identified edits to the language of 501.180(4)(c).
- Commissioner Stebbins proposed additional language for subsection (c).
  - The AC asked Commissioner Stebbins to expound on his rationale.
  - Commissioner Stebbins expressed a desire to lessen regulatory hurdles for certain municipalities as a means of positively reinforcing good faith efforts around HCAs and CIFs. He proposed allowing MEs and municipalities to submit a joint attestation of agreement to the amount due in lieu of the Invoice of Impact. He further noted the added positive impact to the Commission's resources.
  - Commissioner Roy noted statute dictates that any cost imposed on a Host Community shall be documented, transmitted to the ME and made part of the public record.
  - Commissioner Stebbins clarified that the normal invoicing process would proceed in the typical fashion, but that if both parties are in agreement, they could compel the Commission to waive the review process.
  - Commissioner Roy asked Commissioner Stebbins to confirm that either the Invoice or an attestation would be submitted to the Commission.
  - Commissioner Stebbins responded affirmatively.
  - The AC acknowledged the benefit of Commissioner Stebbins' proposal. She expressed concerns of added pressure on MEs to sign an attestation.
  - Commissioner Stebbins noted the number of safeguards in place to protect MEs.
  - DOL Potvin echoed Commissioner Roy's remarks that statute dictates invoices be submitted to the Commission. He stated that if the proposal is accepted, the statutory language around the Invoice of Impact would need amending. He added that the policy objective behind the regulation is to verify the information but also collect and publicize it through the open data platform and elsewhere. He further added that even if municipalities attest, the statutory requirement around CIFs needs to be fulfilled.
  - Commissioner Roy urged the body to contemplate how the proposed action may offer an unfair advantage to Multi-State Operators (MSO).
  - Commissioner Stebbins thanked Commissioner Roy and DOL Potvin for their perspectives. He reiterated his earlier statement about reinforcing good behavior on the part of municipalities and reducing the administrative burden on Commission staff.
  - The AC noted that a major crux of Chapter 180 was about the documentation component of previous laws. She quoted a former law about CIFs. She added that it has been made clear that the required documentation was never provided to a number of licensees. She further added that Chapter 180 not only requires documentation, but also grants the Commission the authority to review CIFs. She opined that Commissioner Stebbins' proposal is therefore not in alignment with the statute. She reflected on the Commission's duty to create a level playing field for all parties.



- Commissioner Stebbins asserted that his proposal does not absolve municipalities of their responsibility to document costs and transmit invoices.
- The AC stated that she could envision the measure having an unintended effect among MEs who may fear being seen as combative if they do not sign the attestation.
- Commissioner Stebbins countered that MEs have the ability to challenge elements of a CIF that they may not agree with and are therefore already faced with that predicament.
- Commissioner Roy reiterated her concerns about MSOs being given an unfair advantage because they have the capital to agree to potentially unfavorable terms to appease municipality. She opined that the proposal represents a step backward.
- Commissioner Camargo appreciated Commissioner Stebbins' proposed option. Perhaps for CIFs but not for HCAs.
- EC Lopez noted that under the proposed approach, a different standard of what constitutes a reasonably related expense may emerge that is inconsistent with the Commission's definition. She raised the question of what to do if an attestation is submitted but the Commission later determines that a CIF was improperly assessed.
- Commissioner Stebbins expressed the attestation tool might benefit the ME.
- AC asked Commissioner Stebbins a qualifying question regarding the attestation proposal; if the Commission receives the invoice, are we able to question the invoice if we deem something unreasonably related.
- Commissioner Roy applauded Commissioner Stebbins for wanting to recognize good behavior. She suggested that there is an alternate means of doing so by spotlighting those municipalities in good compliance standing via the open data platform.
- Commissioner Stebbins requested to revisit the topic at a later time in the meeting, pending consultation with the Legal department.
- AGC Carter identified edits to the language of 501.180(4)(c)(1-3).
- EC Lopez suggested switching subsections (2) and (3). She noted that doing so introduces the scope of circumstances under which the agency would make a final determination on gross annual sales. She added that it would help clarify for the public that the Commission making a determination on gross annual sales would only transpire under select circumstances.
  - The AC noted a consensus on the amendment.
- AGC Carter identified edits to the language of 501.180(4)(c)(4-6).
- Commissioner Camargo asked to clarify the legalities around when the law went into effect and how that informs the collection of improper CIFs.
  - AGC Carter responded that the new standards around CIFs and HCAs went into effect with the passing of Chapter 180 on November 9, 2022. He added that the new law authorized the Commission to promulgate regulations for the purposes of clarifying, administering, and enforcing the provisions.
  - Commissioner Camargo raised the question of how the Commission is



- signaling that the new laws are in effect and enforcing them accordingly.
- EC Lopez acknowledged that they are operating in a unique legal landscape. She noted that the preexisting laws set limitations on Host Communities with regard to assessing CIFs, which Chapter 180 added to in granting the Commission oversight. She further noted that the legislature put stakeholders on notice that the Commission would hold enforcement authority over HCAs and CIFs, and in turn gave the Commission a year to develop the framework for exercising that authority. She added that in November 2023, stakeholders will be put on notice again as to how enforcement will be carried out. She acknowledged that the agency's enforcement authority over violations that occurred during that one-year window is presently unclear.
  - The AC thanked EC Lopez for her insight and expressed a need to revisit the matter.
  - Commissioner Roy expressed concern over the language of subsection (6). She asked when the ME is expected to provide proof of payment to the Commission, whether or not it is being contested.
    - DOL Potvin responded that it would be due at the next point in the renewal application cycle, per the draft regulations.
    - Commissioner Roy suggested the need to reconsider. She detailed her concern that an unreasonable amount of time may elapse before the Commission receives proof of payment.
    - DOL Potvin advocated for keeping the policy as-is so that the Commission does not inadvertently introduce another administrative hurdle for MEs. He added that by the time the Commission receives the renewal application they have already received and certified the CIF.
    - EC Lopez noted that subsection (6) refers to CIFs that are the subject of a dispute. She asked Commissioner Roy to clarify her concern.
    - Commissioner Roy responded that in some instances it could take over a year to receive proof of payment and she wanted to be sure the body was okay with that.
    - DOL Potvin acknowledged Commissioner Roy's concerns. He added that the compliance element will be fulfilled at the renewal stage when the CIF is certified. He opined that administrative efficiency is a suitable tradeoff for the delay in receiving proof of payment. He deferred to the body.
  - Commissioner Stebbins proposed the addition of a subsection (7) to encompass instances where there is a dispute or resolution of a dispute, and the ME is found not to be liable for the CIF. He offered suggested language.
    - The AC raised the possibility of inserting the language into subsection (6). She noted a consensus on the intent and suggested revisiting the language at a later time.
  - Commissioner Roy asked if the Commission has the authority to designate a CIF as a business expense for tax purposes.



- AGC Carter remarked that the idea is novel and worthy of exploring, but that he was unsure if a regulatory discussion was the right context in which to do so as it seems to implicate the tax code. He raised the idea of potentially issuing a notice to make licensees aware of it.
  - The body concurred.
- AGC Carter identified edits to the language of 501.180(5)(a-f).
- Commissioner Roy asked if subsection (f) suggests that HCA Waivers are in effect in perpetuity once signed.
  - AGC Carter responded affirmatively.
  - EC Lopez noted that subsection (i) dictates that an HCA Waiver may be rescinded with Commission approval.
- AGC Carter identified edits to the language of 501.180(5)(g-i).
- Commissioner Roy asked if language should be incorporated to encompass electronic signatures.
  - AGC Carter responded that he would interpret the language to encompass both “wet” and electronic signatures.
  - EC Lopez concurred with AGC Carter’s interpretation.
  - DOL Potvin concurred with AGC Carter and EC Lopez. He added that, as a matter of contract law, any representation of a signature by a party in any form and manner can generally be considered their signature.
- AGC Carter identified edits to the language of 501.180(5)(j).

Commissioner Roy moved to take a five-minute recess.

- Commissioner Stebbins seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Callender Concepcion – Yes
- The Commission unanimously approved taking a 5-minute recess, returning at 11:30 AM. (02:23:41)
- The AC stated that the body will now contemplate any matters they previously agreed to revisit at a later time.
- EC Lopez asked the AC to affirm the body’s consensus on the amendment to 501.180(4)(c)(6) before proceeding.
  - The AC concurred and asked EC Lopez to restate the proposed language.
  - The AC asked Commissioner Stebbins if the proposed language sufficiently captures his intention.
  - Commissioner Stebbins responded affirmatively.
  - The AC noted a consensus on the amended language.
- AGC Carter suggested that it would be timely to revisit any tabled matters from earlier in the regulatory discussion throughout the week. He offered a brief overview of the talking points. He deferred to the AC as to how to proceed with the discussion.





- Commissioner Camargo directed the body to 500.180(2)(c)(2)(b-c). She stated that she would like to move to strike subsections (b) and (c). She reiterated her concerns.
  - Commissioner Roy stated that she interpreted the language of the subsections differently and believes it provides a system of checks and balances against unilateral decision making.
  - The AC offered additional context and perspective in support of retaining the subsections. She added that the language speaks to the fact that public health concerns vary from municipality to municipality.
  - DOL Potvin acknowledged Commissioner Camargo’s concerns. He likewise offered additional context and perspective.
  - Commissioner Stebbins proposed alternative language for the subsections to communicate in more definitive terms that the costs must be directly related to the operation of an ME.
  - Commissioner Camargo indicated that she would like to maintain her motion. She raised the possibility of adding conditions to the language.
  - The AC asked Commissioner Camargo to restate her proposed conditions.
  - Commissioner Camargo reviewed her proposed conditions. She maintained that if there is not a consensus to strike the subsections that the language should emphasize and make clear that the costs must be documented and reasonably related.
- Commissioner Roy raised the question of whether subsection (g) addresses the aforementioned concerns around checks and balances. She invited the ADGC Carter to comment.
  - AGC Carter noted that the matter is ultimately a policy decision for the board. He discussed his impression of how certain word choices impact the overall intent of the language. He ultimately recommended that the board arrive at a consensus or proceed with the language intact.
- The AC raised the possibility of combining the amendments proposed by Commissioners Camargo and Stebbins.
- Commissioner Roy invited DOL Potvin to remark on the potential administrative impact of the condition.
  - DOL Potvin opined that an addendum would conflict with the body’s determination to prohibit supplemental contractual vehicles. He recommended that any language needed to offer peace of mind around provisions involving a chief of police or public health official be stated and attested to within the HCA.
- Commissioner Roy asked DOL Potvin if the language proposed by Commissioner Stebbins would have the desired effect.
  - DOL Potvin responded affirmatively. He offered a reminder that every municipality has a contracting authority who will ultimately be responsible for signing off on the validity of the contract. He added that if the contracting authority attests that a provision of an HCA is necessary to ensure public safety, it could be presumed that the condition is reasonable.
- Commissioner Camargo underscored the need for information and data to justify the condition.



- Commissioner Stebbins expressed the desire to see the proposed language as part of an HCA versus as a standalone document. He likewise expressed the desire to incorporate a mention of chief fire officers alongside references to chief law enforcement authorities with regard to public safety. He noted there are situations in which Fire and Rescue may respond to an emergent situation at an ME and not just law enforcement.
  - EC Lopez remarked that from an Enforcement standpoint, the Commission need not concern itself with the language proposed by Commissioner Camargo being inconsistent with the expectation that an HCA cover all stipulation of responsibilities. She added that the separate document would not constitute a term or condition of the HCA, but rather a supporting document. She ultimately deferred to the board.
  - The AC raised a concern about the undue administrative burden on the Commission if both a provision embedded in an HCA and an attestation by a chief public health authority have to be reviewed.
  - EC Lopez clarified that the Enforcement department would be required to contemplate the chief law enforcement's input, with or without the determination being in writing.
  - Commissioner Stebbins reiterated that he would like to find a path forward to include the information within an HCA.
  - Commissioner Roy echoed prior sentiments about the administrative burden to the agency.
  - DOL Potvin acknowledged that, per statute, the HCA is the only document that can contain the stipulations and responsibilities between parties. He explained that if the agency received a letter (i) from a chief of police or public health authority; (ii) that established a requirement of an ME not in the HCA; and (iii) was signed off by the contracting authority, the Commission would not be under any obligation to follow it.
  - EC Lopez allowed that if a letter were to establish a requirement, it would not be something that the Commission would have to take into consideration. She clarified that the type of letter in question would seek an opinion provided voluntarily by the Host Community or licensee. She further clarified that the language on the table allows for the official in question to offer an opinion and does not call for the introduction of a new requirement.
  - Commissioner Camargo further emphasized her position.
  - The AC maintained that the Commission would still retain the authority to evaluate the conditions.
  - Commissioner Camargo raised the question of whether an authority would feel compelled to provide evidence to support their condition based on the language as it is written.
  - DOL Potvin proposed striking subsection (b) and (c) and amending the language of (a) to require that the condition be based on established public health and safety protocol. He suggested language.
- Commissioner Roy raised a concern about imposing the requirement of a written document for one condition over the rest.



- DOL Potvin clarified that a written component would not be required - just that the condition be based on established procedure.
- Commissioner Stebbins objected to the language on the basis that he perceived it to be consistent with the same treatment a municipality would give any other business. He asked to clarify if the language would encompass standard bylaws, ordinances, or regulations, or also any that a municipality has introduced to accommodate MEs in their community.
  - The AC noted that subsection (d) speaks to provisions that apply to non-marijuana businesses.
  - DOL Potvin clarified that all applicable rules would apply.
- Commissioner Camargo noted that EC Lopez provided alternative language. She quoted the language.
- Commissioner Roy shared that MEs are increasingly hosting in-person community events that sometimes draw hundreds to thousands of attendees. She added that part of the HCA is that the ME must have first responders onsite. She further added that the proposed language would preclude any discretion on the part of the municipality to require first responders because it would not already be in the bylaws.
  - AGC Carter responded that such discretion would typically be captured in the standard ordinances for a large event of any nature.
  - Commissioner Roy maintained that the language would preclude any ability to ensure public health and safety outside of the scope of established regulations. She added that the body cannot anticipate every single possible circumstance.
  - AGC Carter allowed that ultimately it would be a policy decision for the board.
  - Commissioner Camargo echoed AGC Carter's comments about Commissioner Roy's choice of example. She expounded on her concerns that the language as written provided the opportunity for authorities to demand arbitrary conditions and CIFs.
  - DOL Potvin opined that the language he proposed covers the hypothetical raised by Commissioner Roy with regard to local public health and safety rules and Standard Operating Procedures (SOP).
  - The AC asked DOL Potvin to read his proposed language aloud.
  - Commissioner Roy maintained that there will be scenarios that fall outside of the normal scope of oversight, such as odor mitigation, and that the proposed language precludes those unknown scenarios.
  - The AC noted that in his proposed language, DOL Potvin referenced the use of SOPs to cover things outside of the bylaws. She invited DOL Potvin to expound.
  - DOL Potvin offered an overview on how SOPs are developed and can be adapted acutely.
  - Commissioner Roy maintained that the language is limiting and could jeopardize public health and safety officials.
  - The AC asked Commissioner Roy if she is then in favor of maintaining the original language.



- Commissioner Roy responded that she is in favor of maintaining the original language along with the amendment proposed by Commissioner Stebbins.
- EC Lopez acknowledged the concerns being raised. She offered a reminder that if a condition is not on the sub-list, it is still subject to the Commission’s assessment of its reasonability. She added that even items on the list are subject to the reasonableness standard on a case-by-case basis. She proposed an amendment to the language set forth by DOL Potvin.
- The AC noted a consensus on replacing the word “promote” with “ensure” in subsections (b) and (c).
- Commissioner Roy asked why the Commission is requiring a written opinion if it will ultimately determine the reasonableness standard.
  - Commissioner Stebbins clarified the working group’s intention behind the language to ascertain extenuating circumstances
- Commissioner Camargo moved to maintain 500.180(2)(c)(2)(a) as written and amend subsections (b) and (c) according to the language proposed by Commissioner Stebbins, which reads as follows: (b) The condition has been deemed necessary to ensure public safety and proposed by the chief law enforcement authority and/or fire protection chief in a Host Community, with explanation and detail as to why the condition is necessary for public safety in a good faith estimate of the costs of such conditions. (c) The condition has been deemed necessary to ensure public health and proposed by the chief public health authority in a host community, with explanation in detail as to why the condition is necessary for public health and a good faith estimate of the cost of such a condition.
  - Commissioner Roy requested an amendment to strike “...and a good faith estimate of the cost of such conditions.”
  - Commissioner Camargo asked Commissioner Roy to clarify her rationale.
  - Commissioner Roy responded that it is a prohibited practice.
  - AGC Carter concurred.
  - The AC clarified Commissioner Roy’s proposed amendment.
  - Commissioner Camargo declined to amend the motion per Commissioner Roy’s request.
  - Commissioner Roy suggested that the condition should be based on actual costs.
  - Commissioner Stebbins countered that actual costs would likely not yet be available given the timeline of when the HCA would be signed.
  - Commissioner Roy noted that “actual costs” is in statute and that they would be going against the statute.
  - AGC Carter proposed alternative language. He offered a reminder that the ultimate determination falls with the Commission.
  - Commissioner Camargo expressed agreement with the language proposed by AGC Carter.
  - Commissioner Stebbins requested the word ensure be incorporated as opposed to the word promote.



- Commissioner Camargo moved to strike 500.180(2)(c)(2)(b-c) and replace with: (b) The condition has been deemed necessary to ensure public safety and proposed by the chief law enforcement authority and/or fire protection chief in a Host Community, with explanation in detail as to why the condition is necessary for public safety. (c) The condition has been deemed necessary to ensure public health and proposed by the chief public health authority in a Host Community, with an explanation in detail as to why the condition is necessary for public health.
- Acting Chair Concepcion seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Callender Concepcion – Yes
- The Commission unanimously approved motion language.

Commissioner Camargo moved to take a five-minute recess.

- Commissioner Stebbins seconded the motion.
- The Acting Chair took a roll call vote:
  - Commissioner Camargo – Yes
  - Commissioner Roy – Yes
  - Commissioner Stebbins – Yes
  - Acting Chair Callender Concepcion – Yes
- The Commission unanimously approved taking a five-minute recess, returning at 1:00 PM (03:50:26)
- AGC Carter stated that the next matter for contemplation is the May 1, 2024, deadline for applications for initial licensure or renewal to include an HCA that complies with 935 CMR 500.000 *et seq.*, or an HCA Waiver per 500.180(3)(b) and 500.101(3)(c).
- Commissioner Camargo discussed the financial implications faced by some applicants as a result of protracted HCA processing times. She acknowledged the potential administrative demands on both the agency and municipalities alike. She maintained that moving the May 1 date would be a net positive.
  - Commissioner Stebbins acknowledged the hardship that both applicants and MEs face by delayed implementation. He noted that the new Model HCA requirement is an important step in helping to expedite the negotiating of HCAs. He noted the important of remembering that many municipalities rely on outside counsel to draft and read Agreements. He opined that extending the deadline is a benefit for all parties involved. He raised the idea that the May 1 deadline may be different for an applicant than an operating ME.
- Commissioner Roy read a letter into the record from Charlotte Hanna of Community Growth Partners regarding the undue burden of the current deadline on her operation.
- Commissioner Camargo proposed a date of February 1, 2024.
  - Commissioner Stebbins asked Commissioner Camargo if the February 1 date would be for new applications as well as renewals.



- Commissioner Camargo responded that she would like the deadline to apply to both groups.
- Commissioner Stebbins expressed a desire for feedback from staff about the proposed deadline.
- DOL Potvin asked if Commissioner Stebbins is seeking to clarify what the effects of that action may be.
- Commissioner Stebbins acknowledged the staff's rationale for the original May 1 deadline. He noted that he is now trying to get a sense of the feasibility of the proposed date.
  - DOL Potvin stated that it is ultimately a policy decision to be determined by the Commissioners. He noted that it would result in a three-month reduction of a thoughtfully considered deadline. He offered an outline of potential outcomes and procedural challenges.
- Commissioner Roy thanked DOL Potvin for his insights. She noted that, with regard to DOL Potvin's concerns about the holiday season, both parties have the option to execute and sign an interim HCA that conforms with the model HCA until both parties can come to an agreement which would offer some remedy.
  - Commissioner Stebbins noted that the Model HCA still needs to be drafted and approved.
  - The AC noted that the working group has already contemplated the deadline. She expressed confidence that a Model HCA could be drafted in enough time.
  - Commissioner Roy noted that the body was directed to form a Model HCA but is not required to promulgate it, which will help with efficiency.
  - EC Lopez suggested that the agency begin drafting the Model HCA as soon as the draft regulations have been finalized.
  - Commissioner Stebbins proposed a March 1, 2024, date in consideration of DOL Potvin's remarks. He added that the benefit is for MEs as well.
- AGC Carter offered an outline of the promulgation timeline. He noted that Feb 1 gives municipalities effectively one month to negotiate.
  - The AC noted the distinction between promulgation and providing notice, which would take place when the draft regulations are finalized and entered into the public record. She suggested that the timeline is sufficient on this basis and would like for it to be taken into consideration.
  - Commissioner Stebbins noted that his proposed date of March 1 is likewise in consideration of the time needed to develop a serviceable Model HCA.
  - Commissioner Roy noted that the original proposed date was January 1. She suggested that March 1 may be the best compromise.
  - Commissioner Camargo commented that she would agree to a March 1 deadline.
  - The AC noted a consensus on the March 1 deadline.
  - AGC Carter indicated that the draft regulations have been updated to reflect the consensus.
- EC Lopez gave an overview of the remaining topics for contemplation.
- The AC stated that she would like to direct the discussion to the provision on





- requiring a new HCA in the event of a name change, per 501.180(2)(h).
- Commissioner Camargo offered her recollection of the body's previous discussion around the topic.
  - EC Lopez noted that the discussion left off with contemplating whether there is a legal problem with the licensee changing its name and if it would necessitate the submission of a new or amended HCA. She recognized Acting Associate Enforcement Counsel Olivia Koval (AAEC Koval) and Associate Enforcement Counsel Philip Schreffler (AEC Schreffler) for their assistance with researching the matter. She read a portion of their findings into the record. She stated that, given the findings, the Commission should not adopt a policy requiring the submission of a new or amended HCA as a result of a name change where it does not affect the rights or obligations of the parties.
    - The AC asked EC Lopez if she or the Enforcement team had amended language to propose.
    - EC Lopez responded that she would work on it and follow up.
  - The AC directed the discussion to the matter of CIF scope.
    - Commissioner Stebbins noted that he would like to first consult with Legal before revisiting the topic.
    - Commissioner Camargo asked ADGC Carter the best method of disseminating proposed language for consideration in advance.
    - AGC Carter responded that any Commissioner could send the language to Legal who could intern disseminate the language anonymously.
    - EC Lopez proposed language regarding her earlier recommendation on name changes.
    - Commissioner Stebbins raised the question of an ME providing notice of the name change to a Host Community.
    - DOL Potvin confirmed that the Commission required that an ME notify a Host Community of a name change. He asked to clarify that an updated HCA is required when there is an actual transfer of a license from one entity to another.
    - EC Lopez responded that whether a Notice of Change of updated HCA is required in that instance is a matter for the board to consider. She noted that if the objective is to streamline the process, then a notice would suffice. She added that if the Commission would seek an amended HCA in the event of a change of location, then she would modify the language accordingly.
    - DOL Potvin outlined the three instances in which the working group envisioned an amended HCA. He clarified that an amended HCA is a new contract. He further clarified that in instances of a change of location or complete change of ownership and control to new individuals and entities, the case law cited by EC Lopez would not be applicable and a new HCA would be required.
    - The AC noted that in the interest of time they would continue the discussion of the matter at the following day's meeting.



- The Acting Chair noted the next meeting would be on September 21, 2023.

5) Adjournment – 04:50:00

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





## Ivannia Corrales Solis

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**From:** Kimberly Roy  
**Sent:** Sunday, October 1, 2023 8:37 PM  
**To:** D'Mitri Agnes  
**Cc:** Ivannia Corrales Solis; Michael Baker  
**Subject:** RE: Letter from Charlotte Hannah

Good evening D'Mitri,

Per your request, please see letter below from the 9/20 public meeting. Feel free to reach out if I can be of further assistance.

Have a wonderful week.

**From:** Charlotte Hanna <charlotte@communitygrowthpartners.com>  
**Sent:** Monday, August 28, 2023 7:15 PM  
**To:** Cannabis Control Commission <commission@cccmaass.com>  
**Subject:** Public Comment - HCA Regulations

Dear Cannabis Control Commission,

I am the principal owner of Community Growth Partners Great Barrington Operations LLC dab Rebelle, which operates a retail establishment in Great Barrington, Massachusetts. As an independent operator competing against multi-state operators with deep pockets, my business faces a very uncertain financial future, and I am extremely concerned about the implications of the draft regulations related to the Host Community Agreements, which were released recently.

Most significantly, I note that the regulations do not address the most pressing problem I am facing with my business. Despite the recent passage of Chapter 180 of the Acts of 2022 regarding Host Community Agreements ("HCA") and Community Impact Fees ("CIFs"), my host community has not agreed to provide any relief from the burdens of my existing HCA. Moreover, based upon my reading of the draft regulations, the Commission is indicating that HCAs do not need to be compliant with the recent amendments to Massachusetts law until May 1, 2024, and CCC will not determine the propriety of impact fees asserted by host communities for the period prior to that date. Accordingly, my host community is likely to continue to try to collect fees under my existing HCA even with the new law which became effective on November 9, 2022. Based upon prior years, this will mean a six figure burden on my business which will significantly impair my chances of being profitable. Notably, the town of Great Barrington has told us consistently and definitively on their own letterhead every year since we've been open that they have incurred no additional expense as a result of our operation. And yet they continue to demand we pay the maximum 3% fee. This is wrong and crippling my small business.

I believe the intent of the recent amendments was to invalidate the improper provisions of HCAs as of November 9, 2022, however, the draft regulations appear to state otherwise. If I am correct in my reading of the draft regulations, I am likely to be faced with the choice of continuing to pay this community exorbitant fees well in excess of any impacts my business has on the community until at least May 1, 2024 or having the municipality terminate my HCA for non-payment. Simply put, given the current state of the industry in Massachusetts, I cannot afford these fees or the litigation costs needed to vindicate my position.

I would urge the Commission to revise these regulations to allow the Commission to review CIFs as of the November 9, 2022 effective date of the recent amendments to the law.

Very truly yours,

Charlotte Hanna



**Kimberly Roy**, Commissioner  
Cannabis Control Commission  
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2 Washington Square  
Worcester, MA 01604  
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**From:** D'Mitri Agnes <DMitri.Agnes@cccmass.com>  
**Sent:** Thursday, September 28, 2023 10:39 PM  
**To:** Kimberly Roy <Kimberly.Roy@cccmass.com>  
**Cc:** Ivannia Corrales Solis <Ivannia.Corrales.Solis@cccmass.com>; Michael Baker <Michael.Baker@cccmass.com>  
**Subject:** Letter from Charlotte Hannah

Commissioner Roy –

I hope you're well. This message is written to inquire about a letter from a Charlotte Hanna of Community Growth Partners that you referenced and entered into the record as part of the 9/20 public meeting. Would you please FWD that correspondence along to Ivannia for inclusion with the Meeting Documents? Thank you!

Warmly,



**D'Mitri Agnes**, *Temporary Legal Assistant*  
Pronouns: He, Him, His  
Cannabis Control Commission  
Union Station  
2 Washington Square  
Worcester, MA 01604  
[DMitri.Agnes@CCCMass.com](mailto:DMitri.Agnes@CCCMass.com)

[www.MassCannabisControl.com](http://www.MassCannabisControl.com)



**Curaleaf Massachusetts, Inc.**  
**0250-COO-03-1023**

**CHANGE OF OWNERSHIP AND CONTROL OVERVIEW**

1. Licensee Information:

Curaleaf Massachusetts, Inc.

License Number	License Type
MC281309	Cultivation
MP281318	Product Manufacturing
MR281263	Retail
MR282052	Retail
MR281309	Retail
MTC385	Medical Marijuana Treatment Center

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

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

Individual	Role
Mary Ferrier	Person with Direct or Indirect Control
Robert Sciarrone	Person with Direct or Indirect Control
Kevin Gilmore	Person with Direct or Indirect Control

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

Entity	Role
Lifebrook Investments Ltd.	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.



**Curaleaf North Shore, Inc.  
0251-COO-03-1023**

**CHANGE OF OWNERSHIP AND CONTROL OVERVIEW**

1. Licensee Information:

Curaleaf North Shore, Inc.

License Number	License Type
MC281255	Cultivation
MP281300	Product Manufacturing
MTC765	Medical Marijuana Treatment Center

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

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

Individual	Role
Mary Ferrier	Person with Direct or Indirect Control
Robert Sciarrone	Person with Direct or Indirect Control
Kevin Gilmore	Person with Direct or Indirect Control

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

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



**Curaleaf Processing, Inc.  
0251-COO-03-1023**

**CHANGE OF OWNERSHIP AND CONTROL OVERVIEW**

1. Licensee Information:

Curaleaf Processing, Inc.

License Number	License Type
RE281303	Research Facility

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
Mary Ferrier	Person with Direct or Indirect Control
Robert Sciarrone	Person with Direct or Indirect Control
Kevin Gilmore	Person with Direct or Indirect Control

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

Entity	Role
Lifebrook Investments Ltd.	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.



## GANESH WELLNESS, INC. MR282740

### CHANGE OF OWNERSHIP AND CONTROL OVERVIEW

1. Licensee Information:

Ganesh Wellness, Inc.

License Number	License Type
MR282740	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
Wayne Capolupo	Person with Direct or Indirect Control
George Haseltine	Person with Direct or Indirect Control
Bradley Kutcher	Person with Direct or Indirect Control
Thomas Regan	Person with Direct or Indirect Control
Jeffrey White	Person with Direct or Indirect Control

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

Entity	Role
191 Lafayette Rd Dispensary Company, LLC	Entity with Direct or Indirect Control
Fourteener, LLC	Entity with Direct or Indirect Control
Salisbury Cultivation and Product Manufacturing, LLC	Entity with Direct or Indirect Control
GBH, 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.



**In Good Health, Inc.**  
**0248-COO-03-1023**

**CHANGE OF OWNERSHIP AND CONTROL OVERVIEW**

1. Licensee Information:

In Good Health, Inc.

License Number	License Type
MC281273	Cultivator
MP281307	Product Manufacturer
MR282468	Retail
MR284655	Retail
MTC3305	Medical Marijuana Treatment Center
MTC105	Medical Marijuana Treatment Center

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

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

Individual	Role
David Noble	Person with Direct or Indirect Control
Kim Freid	Person with Direct or Indirect Control

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

Entity	Role
Gerald Freid 2023 Irrevocable Trust	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.



**Nature's Alternative, Inc.**  
**0249-COO-03-1023**

**CHANGE OF OWNERSHIP AND CONTROL OVERVIEW**

1. Licensee Information:

Nature's Alternative, Inc.

License Number	License Type
MR283325	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
Andrew Wilkes	Person with Direct or Indirect Control

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

Entity	Role
AW Funding, 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.



**Northeastcann, Inc.**  
**0225-COO-01-0423**

**CHANGE OF OWNERSHIP AND CONTROL OVERVIEW**

1. Licensee Information:

Northeastcann, Inc.

License Number	License Type
MR284438	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
Sabrina Ruz	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.



**Turnbuckle Consulting Inc.  
0258-COO-01-1123**

**CHANGE OF OWNERSHIP AND CONTROL OVERVIEW**

1. Licensee Information:

Turnbuckle Consulting Inc.

License Number	License Type
MC281770	Cultivator
MR281951	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
Nikitshia Bajardi	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.



## Marijuana Establishment Renewals

### Executive Summary

Commission Meeting: December 14, 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	Apothca, Inc	MR281447	MRR206692	Lynn	\$0.00
2	Apothca, Inc.	MR282730	MRR206706	Arlington	\$0.00
3	Aries Laboratories LLC	IL281325	ILR267926	Marlborough	\$0.00
4	Aspen Blue Cultures Inc.	MP281802	MPR243919	Attleboro	\$0.00
5	Aspen Blue Cultures Inc.	MC282515	MCR140403	Attleboro	\$0.00
6	ATOZ Laboratories, Inc.	IL281335	ILR267930	Hopkinton	\$0.00
7	Aunty Budz LLC	MB282396	MBR169322	Northampton	\$0.00
8	Aura Cannabis Company LLC	MC282387	MCR140557	Fall River	\$0.00
9	Aura Cannabis Company LLC	MR282487	MRR206637	Fall River	\$0.00
10	BB Botanics LLC	MR282084	MRR206661	Essex	\$0.00
11	BB Botanics LLC	MC282817	MCR140615	Essex	\$0.00
12	Cannabis Connection, Inc	MR281362	MRR206686	Westfield	\$0.00
13	Caregiver-Patient Connection	MC281254	MCR140616	Barre	\$0.00
14	Caregiver-Patient Connection LLC	MC282237	MCR140617	Barre	\$0.00
15	Community Growth Partners Northampton Operations LLC	MC282162	MCR140587	Northampton	\$0.00
16	Coyote Cannabis Corporation	MC283657	MCR140600	Uxbridge	\$0.00
17	Coyote Cannabis Corporation	MP282152	MPR244079	Uxbridge	\$0.00
18	D2N2,LLC	MR281517	MRR206675	Great Barrington	\$0.00
19	dba EMJ LLC	MC282135	MCR140610	Cummington	\$0.00
20	Emerald City Growers Incorporated	MC281618	MCR140368	Clinton	\$0.00



21	Four Trees Holyoke LLC	MR283237	MRR206660	Holyoke	\$0.00
22	Four Trees Holyoke LLC	MC282497	MCR140634	Holyoke	\$0.00
23	Gibby's Garden LLC	MB281347	MBR169323	Uxbridge	\$0.00
24	Good Chemistry Nurseries of Massachusetts, LLC	MP281816	MPR244014	Holliston	\$0.00
25	Good Chemistry Nurseries of Massachusetts, LLC	MC282540	MCR140527	Holliston	\$0.00
26	Green Adventure LLC	MR284489	MRR206678	Ware	\$0.00
27	Green Era LLC	MR282001	MRR206685	Fitchburg	\$0.00
28	Green Era LLC	MR282211	MRR206689	Fitchburg	\$0.00
29	Green Era LLC	MR282902	MRR206682	Mendon	\$0.00
30	Greencare Collective LLC	MR284476	MRR206666	Millbury	\$0.00
31	Highdration LLC	MP282070	MPR244067	Lowell	\$0.00
32	Holland Brands NA, LLC	MR283288	MRR206672	North Attleborough	\$0.00
33	Hudson Botanical Processing, LLC	MP282157	MPR244078	Hudson	\$0.00
34	Infused Element, LLC	MP282201	MPR244095	Holyoke	\$0.00
35	J&L Enterprises, Inc.	MC282392	MCR140622	Orange	\$0.00
36	KG Collective Brockton, LLC	MR281374	MRR206619	Brockton	\$0.00
37	KindRun Massachusetts, LLC	MD1270	MDR272557	Hudson	\$0.00
38	KRD Growers, LLC	MR282670	MRR206704	Clinton	\$0.00
39	KRD Growers, LLC	MC282173	MCR140637	Clinton	\$0.00
40	KRD Growers, LLC	MP281683	MPR244100	Clinton	\$0.00
41	Mass Yield Cultivation LLC	MC281392	MCR140543	Pittsfield	\$0.00
42	Matriline Farms LLC	MC282295	MCR140631	Douglas	\$0.00
43	Matriline Farms LLC	MP282084	MPR244099	Douglas	\$0.00
44	Mint Retail Facilities LLC	MR283295	MRR206680	Belmont	\$0.00
45	Mission MA, Inc.	MR281259	MRR206500	Worcester	\$0.00
46	Mission MA, Inc.	MR282028	MRR206501	Brookline	\$0.00
47	Mission MA, Inc.	MC281288	MCR140522	Worcester	\$0.00
48	MMM Transport, Inc.	MT281556	MTR263111	Northampton	\$0.00
49	Nature's Alternative, Inc.	MR283325	MRR206691	Wellfleet	\$0.00
50	New Leaf Enterprises, Inc.	MR283203	MRR206632	Fall River	\$0.00
51	New Leaf Enterprises, Inc.	MR283204	MRR206622	Fall River	\$0.00
52	Pepperell Roots, LLC	MC283252	MCR140614	Pepperell	\$0.00
53	Pepperell Roots, LLC	MP282002	MPR244077	Pepperell	\$0.00
54	PharmaCannis Massachusetts, Inc.	MR282298	MRR206670	Shrewsbury	\$0.00
55	Prime Tree LLC	MC283233	MCR140584	Salem	\$0.00
56	Prime Tree LLC	MP281993	MPR244069	Salem	\$0.00
57	QPS Massachusetts Holdings	 MP281696	MPR244038	Franklin	\$0.00

	LLC				
58	QPS Massachusetts Holdings LLC	MC281517	MCR140561	Franklin	\$0.00
59	Reverie 73 Beverly LLC	MR282952	MRR206676	Beverly	\$0.00
60	Reverie 73 Gloucester LLC	MR282315	MRR206677	Gloucester	\$0.00
61	SafeTiva Labs LLC	IL281354	ILR267931	Westfield	\$0.00
62	Sanctuary Medicinals, Inc.	MP281405	MPR244080	Littleton	\$0.00
63	Sanctuary Medicinals, Inc.	MC281308	MCR140596	Littleton	\$0.00
64	Seaside Joint Ventures, Inc.	MR284549	MRR206714	Orleans	\$0.00
65	Silver Therapeutics, Inc.	MR281271	MRR206683	Williamstown	\$0.00
66	TDMA LLC	MR282376	MRR206667	Worcester	\$0.00
67	The Blue Jay Botanicals, Inc.	DO100159	DOR5182964	Athol	\$0.00
68	The Heirloom Collective, Inc.	MR283029	MRR206711	Hadley	\$0.00
69	Treevit LLC	DO100105	DOR5182963	Athol	\$0.00
70	Western Front, LLC	MR281907	MRR206705	Chelsea	\$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: December 14, 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)
71	Apothca, Inc.	RMD1667	Fitchburg	Boston
72	Apothca, Inc.	RMD1065	Fitchburg	Lynn
73	Beacon Compassion Inc.	RMD1729	Attleboro	Framingham
74	FFD Enterprises MA, Inc.	RMD1165	West Tisbury	West Tisbury
75	Heka Incorporated	RMD1385	Westfield	Westfield
76	MD Holistics, Inc.	RMD1606	West Bridgewater	West Bridgewater
77	PharmaCannis Massachusetts, Inc.	RMD1688	Holliston	Newton
78	Resinate, Inc.	RMD1345	Douglas	Worcester

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.



## **617 Therapeutic Health Center, Inc.**

MC282414

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

617 Therapeutic Health Center, Inc.  
d/b/a 617 THC  
1073 Main Street, Millis, MA 02054

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

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

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

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 retail license under the name of 617 Therapeutic Health Care, Inc.

### **LICENSING OVERVIEW**

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

### **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): November 7,





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. Transportation

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

**RECOMMENDATION**



Commission staff recommend final licensure with the following conditions:

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

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

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



## Charles River Remedies, LLC

MR283511

### ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Charles River Remedies, LLC  
d/b/a Yamba Boutique  
31 Church Street, Cambridge, MA 02138

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

Retail

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

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 retail and marijuana delivery applications/licenses under the names of 1730 Mass Ave, Inc., 612 Studios, LLC and Home Grown 617, LLC.

### LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on June 17, 2021.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): October 10,



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.



**Grass Appeal, LLC**  
MC282123

**ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Grass Appeal, LLC  
d/b/a Blackston Valley Cannabis  
79 River Road, Uxbridge, MA 01569

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

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

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

Type	Status	Location
Retail	Commence Operations	Uxbridge
Product Manufacturing	Commence Operations	Uxbridge
MTC	Provisional License	Uxbridge-Uxbridge

**LICENSING OVERVIEW**

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

**INSPECTION OVERVIEW**

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. Cultivation Operation

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

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

d. Transportation

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

**RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:



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

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

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





## **Green Flash Delivery, LLC**

MD1298

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Green Flash Delivery, LLC  
225 Southampton Street, Boston, MA 02118

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

Marijuana Delivery Operator

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 14, 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): November 1, 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

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

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

**RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:

1. The licensee may 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.
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.



**Health Circle, Inc.**  
MC281787

**ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Health Circle, Inc.  
21 Commerce Road, Rockland, MA 02370

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

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

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

Type	Status	Location
Retail	Provisional License	Marshfield
Product Manufacturing	Provisional License	Rockland
Retail	Commence Operations	Rockland

**LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on April 25, 2019.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
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 19, 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. Transportation

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

**RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:



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

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

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



## **Hoop City Ventures, LLC**

MR284806

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Hoop City Ventures, LLC  
d/b/a Dazed  
399 Boston Road W, Monson, MA 01057

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 names of Tigertown, LLC, Flying Goose, LLC, and Dark Stream, LLC.

### **LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on August 10, 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): November 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. 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.



**MRM Industries, LLC**  
MP281798

**ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

MRM Industries, LLC  
420 West Street, Uxbridge, MA 01569

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

Product Manufacturing

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

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

Please note that individuals and/or entities associated with the proposed application(s) are also associated with other adult-use cultivation, product manufacturing, retail and marijuana delivery applications/licenses under the names of Healing Calyx, LLC, Stone's Throw Cannabis, LLC d/b/a Firebrand Cannabis, Holyoke 420, LLC, Mint Retail Facilities, LLC and Coyote Cannabis Corporation.

**LICENSING OVERVIEW**

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

**INSPECTION OVERVIEW**



8. Commission staff inspected the licensee's facility on the following date(s): November 7, 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

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



## **RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:

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

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

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



## Natural Agricultural Products, LLC

MR284177

### ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Natural Agricultural Products, LLC  
d/b/a Natural Agricultural Products  
1437 Bedford Street, Abington, MA 02351

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

Retail

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

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

### LICENSING OVERVIEW

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

### INSPECTION OVERVIEW

8. Commission staff inspected the licensee's facility on the following date(s): October 19, 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.



**Pioneer Valley Trading Company, LLC**  
MR284022

**ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Pioneer Valley Trading Company, LLC  
475 Southampton Road, Westfield, MA 01085

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

Retail

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

Type	Status	Location
Cultivation, Tier 5/Indoor (30,001 – 40,000 sq. ft.)	Provisional License	Westfield
Product Manufacturing	Provisional License	Westfield

**LICENSING OVERVIEW**

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on May 12, 2022.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
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): November 21, 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.



## Sweetgrass Botanicals, LLC

MP282058

MR284185

### ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Sweetgrass Botanicals, LLC  
635 Laurel Street, Lee, MA 01238

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

Product Manufacturing  
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 October 14, 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): November 8, 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. 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.



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 possess, prepare, produce, 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.



## Theory Wellness, Inc.

MR284150

### ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Theory Wellness, Inc.  
d/b/a Hi5  
162 Mystic Avenue, Medford, MA 02155

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	Commence Operations	Chicopee
Cultivation, Tier 10/Outdoor (80,001 – 90,000 sq. ft.)	Commence Operations	Sheffield
Cultivation, Tier 2/Indoor (5,001 – 10,000 sq. ft.)	Commence Operations	Bridgewater
Product Manufacturing	Commence Operations	Bridgewater
Retail	Commence Operations	Great Barrington
MTC	Commence Operations	Bridgewater-Chicopee
MTC	Commence Operations	Bridgewater-Bridgewater
MTC	Commence Operations	Bridgewater-Great Barrington

### LICENSING OVERVIEW

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



April 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 10, 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

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

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

**RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:

1. The licensee may possess 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.





## **Twisted Growers, LLC**

MC281714

MP281909

### **ESTABLISHMENT OVERVIEW**

1. Name and address of the Marijuana Establishment:

Twisted Growers, LLC  
418 Millennium Circle, Lakeville, MA 02347

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

Cultivation, Tier 11/Indoor (90,001 – 100,000 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 November 19, 2020.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license(s).
7. No new information has been discovered by Commission staff regarding the suitability of the licensees previously disclosed since the issuance of the provisional license(s).

### **INSPECTION OVERVIEW**

8. Commission staff inspected the licensee's facility on the following date(s): October 16, 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.



## Union Twist, Inc.

MR284038

### ESTABLISHMENT OVERVIEW

1. Name and address of the Marijuana Establishment:

Union Twist, Inc.  
259 Cambridge Street, Boston, MA 02134

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	Commence Operations	Boston
Retail	Provisional License	Framingham

### LICENSING OVERVIEW

4. The licensee was approved for provisional licensure for the above-mentioned license(s) on April 7, 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): November 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.



## Grass Appeal, LLC MTC3770

### ESTABLISHMENT OVERVIEW

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

Grass Appeal, LLC  
d/b/a Blackstone Valley Cannabis

Cultivation: 79 River Road, Uxbridge, MA 01569  
Product Manufacturing: 79 River Road, Uxbridge, MA 01569  
Dispensary: 79 River Road, Uxbridge, MA 01569

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

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

### LICENSING OVERVIEW

3. The licensee was approved for provisional licensure on October 13, 2023.
4. The licensee has paid all applicable license fees.
5. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license.
6. No new information has been discovered by Commission staff regarding the suitability of the licensee(s) previously disclosed since the issuance of the provisional license.

### INSPECTION OVERVIEW

7. Commission staff inspected the licensee's Medical Marijuana Treatment Center on the following date(s): October 18, 2023.



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

a. Security

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

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

b. Inventory and Storage

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

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

c. Cultivation Operation

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

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

d. Product Manufacturing Operation

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

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





e. Retail Operation

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

- i. Verification of identifications for access;
- ii. Layout of the sales floor;
- iii. Availability and contents of patient education materials; and
- iv. Policies to ensure dispensing limits are followed.

f. Transportation

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

**RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:

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

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

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



**Green Gold Group**  
MTC3831

**ESTABLISHMENT OVERVIEW**

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

Green Gold Group

Dispensary: 1140 Thorndike Street, Palmer, MA 01069

\*The licensee’s cultivation and product manufacturing operations have commenced operations previously under another MTC license.

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

Type	Status	Location
Retail	Provisional License	Palmer
Retail	Commence Operations	Marlborough
Retail	Commence Operations	Charlton
Cultivation, Tier 7/Indoor (50,001 – 60,000 sq. ft.)	Final License	North Brookfield
Product Manufacturing	Final License	North Brookfield
MTC	Commence Operations	North Brookfield-Charlton

**LICENSING OVERVIEW**

3. The licensee was approved for provisional licensure on February 9, 2023.
4. The licensee has paid all applicable license fees.
5. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license.
6. No new information has been discovered by Commission staff regarding the suitability of the licensee(s) previously disclosed since the issuance of the provisional license.

**INSPECTION OVERVIEW**



7. Commission staff inspected the licensee's Medical Marijuana Treatment Center on the following date(s): November 7, 2023.
8. The licensee's Medical Marijuana Treatment Center was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 501.000, as applicable.
9. No evidence was discovered during the inspection(s) that indicated the Medical Marijuana Treatment Center was not in compliance with all applicable state and local bylaws or ordinances.
10. Specific information from Commission staff's inspection is highlighted below:

a. Security

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

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

b. Inventory and Storage

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

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

c. Retail Operation

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

- i. Verification of identifications for access;
- ii. Layout of the sales floor;
- iii. Availability and contents of patient education materials; and
- iv. Policies to ensure dispensing limits are followed.

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.

## **RECOMMENDATION**

Commission staff recommend final licensure with the following conditions:

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

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

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



**CommCan, Inc.**  
MRN284925

**APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

CommCan, Inc.  
611 West St., Mansfield, MA 02084

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

Retail

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

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

Type	Status	Location
Retail	Commence Operations	Rehoboth
Retail	Commence Operations	Millis
Product Manufacturing	Commence Operations	Medway
Cultivation, Tier 3/Indoor (30,001 – 40,000 sq. ft.)	Commence Operations	Millis
MTC	Commence Operations	Medway-Millis
MTC	Commence Operations	Medway- Southborough
MTC	Provisional License	Medway-Mansfield

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

Individual	Role
Ellen Rosenfeld	Person Having Direct/Indirect Control
Jon Rosenfeld	Person Having Direct/Indirect Control
Marc Rosenfeld	Person Having Direct/Indirect Control



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

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

6. Applicant's priority status:

Expedited Applicant (Woman-Owned Business)

7. The applicant and municipality executed a Host Community Agreement on January 11, 2023.

8. The applicant conducted a community outreach meeting on March 30, 2023, and provided documentation demonstrating compliance with Commission regulations.

9. The Commission received a municipal response from the City/Town of Mansfield on November 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	Recruit at least 25% of its staff from Mansfield.
2	Provide a quarterly donation in the amount of \$1,000 to Mansfield's Food Pantry, Our Daily Bread.

**BACKGROUND CHECK REVIEW**

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

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

**MANAGEMENT AND OPERATIONS PROFILE REVIEW**

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

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

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



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

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

#	Goal
1	Increase the number of qualified, diverse individuals in management positions with a goal of minorities (10%), women (40%), veterans (5%), persons with disabilities (5%) and LGBTQ+ (10%) in management positions.
2	Contract with diverse businesses for the purchase of wholesale marijuana product with a goal of contracting with minority-owned (10%), woman-owned (40%), veteran-owned (5%), persons with disabilities-owned (5%), and LGBTQ+-owned (10%) business enterprises.
3	Recruit minorities (10%), women (40%), veterans (5%), persons with disabilities (5%) and LGBTQ+ (10%) for its hiring initiatives.

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. Final licensure is subject to the applicant ensuring that all remaining required individuals be fingerprinted pursuant to previous Commission notifications.
4. The applicant shall cooperate with and provide information to Commission staff.
5. Provisional licensure is subject to the payment of the appropriate license fee.

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



## Flora Holdings, LLC

MRN284981

### APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Flora Holdings, LLC  
221 Bear Hill Road, Waltham, MA 02451

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

Retail

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

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

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

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

Individual	Role
Kaitlyn Smith	Person Having Direct/Indirect Control / Capital Contributor
Erica Zimmerman	Person Having Direct/Indirect Control
Brian Zimmerman	Person Having Direct/Indirect Control / Capital Contributor
Patrick Smith	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 (Woman-Owned Business)

7. The applicant and municipality executed a Host Community Agreement on February 23,





2023.

8. The applicant conducted a community outreach meeting on June 8, 2023, and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent a municipal notice with a copy of the application to the City/Town of Waltham on 09/15/23. The Commission did not receive a response within 60 days pursuant to 935 CMR 500.102(1)(d).
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Recruit 25% of its employees from census tracts of Lowell and/or Massachusetts residents who have or have parents or spouses who have past drug convictions for its hiring initiatives.
2	Provide educational programs and informational sessions geared towards individuals from Lowell and/or Massachusetts residents who have, or have parents or spouses who have, past drug convictions that are interested in the cannabis industry, with specific focus on marijuana retailers and entrepreneurship at least twice a year.

### **BACKGROUND CHECK REVIEW**

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

### **MANAGEMENT AND OPERATIONS PROFILE REVIEW**

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

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

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



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

#	Goal
1	Recruit women (50%), minorities (20%), persons with disabilities (10%), veterans (5%), and LGBTQ+ (10%) for its hiring initiatives.
2	Offer 100% of opportunities for advancement to management and executive positions internally.
3	Ensure 100% of its employees receive training on diversity and sensitivity.

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.



## FreeMarketMA, LLC

MPN282279

### APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

FreeMarketMA, LLC  
118 Bayview Avenue, Berkley, MA 02779

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

Product Manufacturing

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

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

Type	Status	Location
Cultivation, Tier 2/Outdoor (5,001 – 10,000 sq. ft.)	Provisional License	Berkley

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

Individual	Role
Timothy Reed	Person Having Direct/Indirect Control / Capital Contributor
Travis Alahmar	Person Having Direct/Indirect Control / Capital Contributor
Nicholas Holt	Person Having Direct/Indirect Control / Capital Contributor
William Nixon	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:

General Applicant



7. The applicant and municipality executed a Host Community Agreement on May 3, 2023.
8. The applicant conducted a community outreach meeting May 18, 2023, and provided documentation demonstrating compliance with Commission regulations.
9. The Commission sent a municipal notice with a copy of the application to the City/Town of Berkley on September 8, 2023. The Commission did not receive a response within 60 days pursuant to 935 CMR 500.102(1)(d).
10. The applicant proposed the following goals for its Plan to Positively Impact Disproportionately Harmed People:

#	Goal
1	Donate \$1,500, no less than annually to The Family Pantry-Damien's Place, a food pantry that serves Wareham and New Bedford.

**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 one (1) month of receiving the provisional license(s).
14. The applicant's proposed hours of operation are the following:

Day(s)	Hours of Operation
Monday-Saturday	10:00 a.m. to 8:00 p.m.
Sunday	12:00 a.m. to 8:00 p.m.

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

#	Goal
1	Recruit minorities (50%), women (40%), veterans (3%), persons with disabilities (2%), LGBTQ+ (2%) for its hiring initiatives.



2	Contract with diverse business comprised of MBE (5%), WBE (5%), VBE (5%), LGBTQ+ business enterprise (5%) and Disability-Owned business enterprises (5%).
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**17.** Summary of products to be produced and/or sold (if applicable):

#	Product
1	Solventless Live Rosin

**RECOMMENDATION**

Commission staff recommend provisional licensure with the following conditions:

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

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



**New England Organics, LLC**  
MRN281936

**APPLICATION OF INTENT REVIEW**

1. Name and address of the proposed Marijuana Establishment:

New England Organics, LLC  
d/b/a Victory Gardens  
114 Mystic Ave, Medford, MA 02155

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

Retail

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

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

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

Please note that individuals and/or entities associated with the proposed license are also associated with other adult-use cultivation, product manufacturing, retail and marijuana delivery applications/licenses under the names of Verdant Medical, Inc. and Verdant Reparative, Inc.

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

Individual	Role
Tito Jackson	Person Having Direct/Indirect Control / Capital Contributor
Jason Zube	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:



General Applicant

- 7. The applicant and municipality executed a Host Community Agreement on July 29, 2022.
- 8. The applicant conducted a community outreach meeting on August 3, 2023 and provided documentation demonstrating compliance with Commission regulations.
- 9. The Commission received a municipal response from the City/Town of Medford on October 16, 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 25% of its workforce who are residents of census tracts of Boston and 20% of its workforce who have a drug-related CORI but are otherwise legally employable in a cannabis-related enterprise.
2	Conduct at least two (2) annual industry-specific educational seminars.
3	Provide at least one (1) annual employee seminar in financial literacy and financial mentoring services.
4.	Hold at least one (1) informational session regarding the process for sealing and expunging criminal records.

**BACKGROUND CHECK REVIEW**

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

**MANAGEMENT AND OPERATIONS PROFILE REVIEW**

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

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

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



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

#	Goal
1	Recruit women (50%), minorities (50%), LGBTQ+ (10%), veterans (10%), and people with disabilities (10%) for its hiring initiatives.
2	Provide training on finding, fostering, and promoting diverse employees at least two annual trainings.

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.





## Yellow House Cannabis, LLC

MRN284969

### APPLICATION OF INTENT REVIEW

1. Name and address of the proposed Marijuana Establishment:

Yellow House Cannabis, LLC  
405-409 Middlesex Road, Tyngsborough, MA 01879

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 cultivation, product manufacturing, and retail licenses under the name of Sanctuary Medicinals, Inc.

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

Individual	Role
Michael Allen	Person Having Direct/Indirect Control
Andreas Sowa	Person Having Direct/Indirect Control
Amadeus Sowa	Person Having Direct/Indirect Control

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

Entity	Role
Yellow HC, LLC	Entity Having Direct/Indirect Control
Trichome Industries, LLC	Entity Having Direct/Indirect Control

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



6. Applicant’s priority status:  
Expedited Applicant (Veteran-Owned Business)
7. The applicant and municipality executed a Host Community Agreement on August 1, 2023.
8. The applicant conducted a community outreach meeting on August 16, 2023 and provided documentation demonstrating compliance with Commission regulations.
9. The Commission received a municipal response from the City/Town of Tyngsborough on October 20, 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 5% of its staff that are residents of Lawrence and 5% of staff that are residents of census tracts of Lowell.
2	Host at least one (1) annual educational seminar for residents of Lawrence or census tracts of Lowell.

**BACKGROUND CHECK REVIEW**

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

**MANAGEMENT AND OPERATIONS PROFILE REVIEW**

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

Day(s)	Hours of Operation
Monday-Saturday	9:00 a.m. to 9:00 p.m.
Sunday	10:00 a.m. to 8:00 p.m.

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



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

#	Goal
1	Recruit women (30%), minorities (20%), LGBTQ+ (5%), veterans (5%), people with disabilities (5%) for its hiring initiatives.
2	Implement an annual training program for all employees regarding diversity, equity, and inclusion principles.
3	Create an inclusive work environment that has no less than an 85% employee satisfaction rate with its DEI initiatives and outcomes.

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.



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## Memorandum

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To: Commissioners  
Cc: Debra Hilton-Creek, Acting Executive Director (Acting ED); Cedric Sinclair, Chief Communications Officer (CCO); Ernesto Reyes Hernandez, Manager of Government Affairs and Policy (MGAP); Jessica Porter, Policy Analyst; Callie MacDonald, Policy Analyst  
From: Matt Giancola, Director of Government Affairs and Policy (DGAP)  
Date: October 27, 2023  
Subject: State-by-State Survey: Delivery License Type

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### PURPOSE:

To provide background for Commissioners on incidents in other jurisdictions who currently require only one agent in the vehicle in relation to adult-use cannabis delivery and medical cannabis delivery.

### BACKGROUND:

The Government Affairs and Policy team is actively engaging with cannabis regulators nationwide to compile valuable insights regarding incidents involving licensed Delivery Operators. This research has resulted in the accumulation of the following data in alphabetical order by state to provide perspective on the current landscape of regulatory concerns in the cannabis delivery sector.

#### Arkansas

Incidents. Arkansas allows delivery for medical patients only. They have received no reported incidents in either Business-to-Business deliveries or Business to Patient deliveries.

Exclusivity. Arkansas does not have a state social equity program or reserve any license types for social equity applicants.<sup>1</sup>

#### California

Incidents. California has had incidents involving licensed delivery operators dating back to 2021. Most suspects appear to be interested in cash and product thefts. Most recently, a licensed delivery driver was robbed at gunpoint in San Bernardino County where cash located in the center console and marijuana inside the trunk of the vehicle were both stolen.<sup>2</sup> In 2022, a

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<sup>1</sup> Minority Cannabis Business Association, [Arkansas](#)

<sup>2</sup> Will Conybeare, KTLA, [“2 men arrested for robbing cannabis delivery driver”](#) (July 25, 2023)

licensed delivery driver was robbed in the middle of his route when the suspects stole money and marijuana product.<sup>3</sup> In 2021, a series of carjackings occurred in Pasadena and surrounding counties, resulting in stolen vehicles containing marijuana products and cash.<sup>4</sup> In these incidents, the vehicles were recovered with product and money unaccounted for. Other reported incidents have included former employees robbing licensed delivery drivers<sup>5</sup> or licensed retailers with location specific delivery permits trying to deliver to municipalities where they do not have a delivery permit.<sup>6</sup>

Exclusivity. At the state level, California does not set any specific licenses aside for social equity operators nor is there any state level licensing priority given. In California, social equity benefits are disbursed at the local level and vary based on jurisdiction with some offering priority review to social equity applicants. Currently, Los Angeles is the only jurisdiction that provides exclusive delivery, retail, and cultivation licenses to Social Equity Applicants until January 1, 2025.<sup>7</sup>

## Colorado

Incidents. Colorado has not been informed of any delivery operator incidents or diversion attempts. Currently only five jurisdictions (Denver, Aurora, Longmont, Superior and Boulder) allow adult use marijuana delivery. Colorado does not have specific requirements regarding the number of agents needed in a delivery vehicle, but it does mandate the occupants are licensed agents who must also be listed on the delivery manifest. Colorado has also been collaborating with state and local law enforcement to monitor, oversee, and tackle illicit delivery operators.

Exclusivity. In Colorado, social equity exclusivity varies based on jurisdiction. Longmont, Superior and Boulder do not offer exclusive delivery permits to social equity applicants while the Cities of Denver and Aurora offer individual equity programs.

Denver, Colorado grants exclusive delivery permits to new or existing retail and medical marijuana transporter licensees who qualify as social equity licensees. Denver also reserves eight separate license types for social equity applicants and does not establish a cap on the number of licenses social equity applicants can hold.<sup>8</sup> This delivery permit exclusivity period, established in 2021, was set to expire in 2024 but was extended in 2022 to last through July 1, 2027. This extension was implemented due to the underwhelming amount of minority business owners in Denver, the limited number of retailers using delivery services, and as part of the city's effort to bring equitable access to the marijuana industry.

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<sup>3</sup> Martha Brennan, The Mercury News, "[Cannabis delivery driver robbed at gunpoint after Oakland delivery](#)" (December 3, 2022)

<sup>4</sup> Kristine de Leon, KTLA5, "[4 detained in connection with 2 separate carjackings of marijuana deliver drivers in Pasadena](#)" (February 26, 2021)

<sup>5</sup> Nate Gartrell, The Mercury News, "[Three Arrested in series of cannabis delivery robberies throughout the East Bay](#)", (October 21, 2020)

<sup>6</sup> Siera Sun Times, "[Three Dispensary Drivers Cited in Ventura County for Illegal Marijuana Delivery Operation into Thousand Oaks](#)" (September 8, 2023)

<sup>7</sup> City of Los Angeles Department of Cannabis Regulation, [General Overview](#) ; City of Los Angeles Department of Cannabis Regulation, [Application Processing](#)

<sup>8</sup> DenverGov.org, "[Frequently Asked Questions About Marijuana Licenses](#)"

Aurora, Colorado also offers delivery permits but it is not exclusive to social equity applicants. However, those who are social equity applicants can obtain a delivery permit and transporter license that will last three years, and they are eligible for licensing discounts. This differs from the usual timeframe for permits and licenses: Delivery Permits are valid for one year; Transporter Licenses are valid for two years. The special Social Equity Delivery Permits and Transporter Licenses are available for three years starting on February 1, 2021, but the discounts on applications and license fees was removed after two years in 2023.<sup>9</sup>

## Connecticut

Incidents. There have been no reported incidents from licensed medical delivery operators. In early 2022, Connecticut legalized adult-use cannabis deliveries with the first licensee obtaining licensure and commencing operations in 2023.<sup>10</sup> Currently there are four separate delivery companies offering recreational cannabis deliveries within the state.

Exclusivity. Connecticut will issue adult use delivery licenses through a lottery process. The applications were accepted between February 17, 2022 and May 18, 2022, with five general licenses and five Social Equity Licenses being awarded. Future lottery rounds will be announced but there is no requirement they will set licenses aside for social equity applicants.<sup>11</sup>

## Maine

Incidents. In 2020, Portland, Maine had three incidents where licensed marijuana delivery drivers were assaulted and robbed at gun point during normal marijuana deliveries.<sup>12</sup> In most of the incidents, the suspects used phone apps to order marijuana providing driver's licenses and medical marijuana cards that had been stolen.<sup>13</sup> In two of the three incidents, the address provided for delivery was not a real address causing confusion upon the agent arriving to deliver the product.<sup>14</sup>

Exclusivity. Maine does not have a state social equity program or reserve any license types for social equity applicants.<sup>15</sup>

## Michigan

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<sup>9</sup> Aurora Colorado, [Retail Marijuana Delivery and Social Equity](#)

<sup>10</sup> State of Connecticut, [Adult- Use Cannabis Delivery Service License](#) (January 20,2022)

<sup>11</sup> *Id.*

<sup>12</sup> Matt Byrne, Portland Press Herald, "[Marijuana delivery driver beaten, robbed at gunpoint in Portland](#)" (December 2, 2020)

<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

<sup>15</sup> ~~Minority Cannabis Business Association, [Maine](#)~~



Incidents. Michigan’s Cannabis Regulatory Agency (“CRA”) was unable to share exact data points or incident numbers for Delivery operators. However, the Michigan CRA released an advisory bulletin in January 2023 alerting marijuana businesses to a concerning pattern of increased, criminal activity relating to licensed delivery drivers.<sup>16</sup> Over the course of two months, the CRA noticed a recurring trend of thefts occurring at residential deliveries. These thirteen incidents sometimes involved the use of weapons, with both marijuana products and delivery vehicles being stolen, and delivery drivers being physically assaulted. On September 1, 2023, a news report announced an individual had been arrested who robbed two licensed marijuana delivery drivers. These two robberies occurred in August after 9 p.m. to the same apartment complex when the delivery driver was unable to make the delivery and was returning to their vehicle. During both incidents, only the product from the delivery was stolen.<sup>17</sup> In October, there were three armed robberies targeting marijuana dispensary drivers. No one was injured during the robberies and the suspected perpetrator has been arrested and charged.<sup>18</sup>

Exclusivity. Michigan does not set aside any license types or any portion of licenses for social equity applicants.<sup>19</sup>

Nevada

Incidents. Initially upon the licensing of delivery operators in 2018, Nevada saw a high number of thefts during licensed deliveries. Most thefts occurred when the individual receiving the product did not match the name on the order, and the recipient ran away with the product. From 2019 through early 2020, there were incidents where the vehicle was robbed, with employee negligence being the main reason for the theft. During the COVID-19 pandemic, Nevada allowed cannabis sales solely through licensed delivery operators which resulted in an increase in vehicle delivery thefts. In the past 6 months, there were four reported thefts during a licensed delivery, and during each the amount of product stolen was less than one ounce. The reported incidents have not resulted in bodily harm to the delivery drivers.

Exclusivity. Nevada does not set aside delivery operator licenses for social equity applicants.<sup>20</sup>

New York

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<sup>16</sup> Michigan Cannabis Regulatory Agency, [“Increased Criminal Activity Against Marijuana Delivery Drivers”](#) (January 17, 2023)

<sup>17</sup> WWJ Newsroom, [“Suspect Arrested in case of 2 cannabis delivery drivers robbed outside Shelby Township apartment complex”](#), (September 1, 2023)

<sup>18</sup> Ryan, Michigan Marijuana News [“15-Year-Old Faces Adult Charges in Macomb County Marijuana Robberies”](#) (October 25, 2023)

<sup>19</sup> Minority Cannabis Business Association, [Michigan](#)

<sup>20</sup> State of Nevada – Cannabis Compliance Board, [Social Equity](#)

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Incidents. New York does not have any delivery operators in operation yet therefore there have been no incidents.

Exclusivity. New York does not have an exclusivity period for delivery licenses however it will prioritize applications from social and economic equity applicants.<sup>21</sup>

#### New Jersey

Incidents. New Jersey does not have any delivery operators in operation yet therefore there have been no incidents. Applications for Delivery Operators commenced on September 27, 2023.

Exclusivity. New Jersey's Cannabis Regulatory Commission will allow social equity applicants a three-month exclusive application window starting on September 27, 2023, to apply for three license types: wholesalers, distributors and delivery services. On December 27, 2023, the application will open to diversely owned businesses and on March 27, 2024, the licenses will be available to all prospective business owners.<sup>22</sup> As of October, there have been no discussions to extend these exclusivity windows.

#### Oregon

Incidents. Oregon has allowed Delivery operators in both the adult use and medical market for years, however licensees are only allowed to deliver recreationally to residences within the jurisdiction they are licensed or in an adjacent jurisdiction that has opted to allow deliveries from other jurisdictions. Medical Deliveries can occur throughout the entire state without this restriction. Due to this restriction, there is a limited amount of delivery operators with few incidents being reported.

Exclusivity. Oregon does not have an exclusivity period for social equity delivery operators.

#### Rhode Island

Incidents. Rhode Island has not had significant incidents with home delivery. An official from the Office of Cannabis Regulation reported they had one minor reported incident where a delivery vehicle was struck by a bicyclist but there have been no diversion or theft attempts.

Exclusivity. Rhode Island does not have an exclusivity period for social equity delivery operators.

#### Washington, D.C.

Incidents. Washington, D.C. allows for medical cannabis deliveries and has reported no incidents regarding their licensed operators.

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<sup>21</sup> New York Office of Cannabis Management, "[What is in the Law: Social and Economic Equity](#)" (March 31, 2021)

<sup>22</sup> Kyle Jaeger, Marijuana Moment, "[New Jersey Regulators Announce New Marijuana Delivery, Wholesaler and Distributor Licenses, with Social Equity Businesses First In Line To Apply](#)" (September 8, 2023)



Exclusivity. At least 50% of all new medical courier licenses are required to be set aside for social equity applicants with no sunset period.<sup>23</sup>

**Overview of State-by-State Survey: Delivery License Type Reported Incidents**

	Type of Delivery	Required Agents	Incidents		Is Delivery Exclusive?
			B2C	B2B	
AR- Arkansas	Medical (2016)	2 Agents Required	0	0	No

<sup>23</sup> DC.gov, Alcoholic Beverage and Cannabis Administration, [“Medical Cannabis Courier License”](#)

CA- California	Adult Use (2016) & Medical (2016)	1 Agent Required	Multiple	Multiple	Los Angeles only until January 2025
CO- Colorado	Adult Use (2021) & Medical (2020)	No Specific Agent Requirement	0	0	In Part <i>(Only in Denver and Aurora)</i>
CT- Connecticut	Adult Use (2022) & Medical (2021)	1 Agent Required  2 Agents Required if the vehicle contains more than 2lbs of cannabis/plant material	0	0	In Part
<b>FL-</b> Florida	Medical (2017)	Medical Only	0	0	No
<b>IL-</b> Illinois	Adult Use (2019) & Medical (2013)	No Delivery Allowed			
ME- Maine	Adult Use (2022) & Medical (2018)	1 Agent Required	3	0	No
MI- Michigan	Adult Use (2019) & Medical (2018)	1 Agent Required	Multiple	0	No
NV- Nevada	Adult Use (2018) & Medical	1 Agent Required  2 if the value of the Marijuana and Products exceed \$25,000	Multiple	0	No
NY- New York	Adult Use (2023) & Medical (2023)	Regulations do not explicitly state 1 Agent however, agent is used in the singular and regulations allow for agent deliveries on bikes, scooters, walking. Therefore, it can be inferred from allowing bikes as a method of transportation that only 1 agent is required.	0*  <i>*No Licenses have been issued yet.</i>		No
NJ- New Jersey	Adult Use (2023) & Medical (2020)	1 Agent Required	0	0	Yes for 3 months
OR- Oregon	Adult Use (2016) & Medical (2018)	1 Agent Required	<i>No definitive answer as data is not divided by license type when reporting.</i>		No
RI- Rhode Island	Medical (2019)	2 Agents Required	1	0	No



Washington, D.C.	Medical (2020)	1 Agent Required	0	0	50% of all new licenses reserved for social equity applicants.
WA-Washington	Adult Use (2012) & Medical (1998)	No Delivery Allowed			

**CANNABIS CONTROL COMMISSION OF CENTRAL MA - JOB DESCRIPTION****JOB TITLE:** Director of Operations**DIVISION:** HR/Operations (Temporary Attachment)**DEPARTMENT:** Operations**REPORTS TO:** Chief People Officer**FLSA:** Exempt/Salary**FT/PT:** Full-Time – 37.5 hrs/wk**ISSUED:** December 2024**JOB SUMMARY**

Reporting to the Chief Human Resources Officer, the Director of Operations will manager all property requirements for the Agency, including the management and application of lease agreements, property maintenance, repairs, and upkeep, in addition, the Director of Operations will supervise administrative, facilities, and fleet management staff.

**CORE RESPONSIBILITIES**

- Works closely with the CPO to ensure the Agency’s commitment to Equity, Diversity, and Inclusion goals are clearly communicated, met, and modeled by all employees.
- Continuous research of possible available space to ensure funding for office space is efficiently utilized.
- Develops policies, procedures, and practices to provide clear guidance on the reservation of workspace at all Cannabis operated facilities.
- Works closely with external property management companies and landlords to manage the Agency’s lease agreements and ensures compliance with all lease requirements are met and maintained for applicable properties.
- Works closely with the Emergency Preparedness Team to ensure the safety and security of all Agency properties.
- Presents at new employee on-boarding sessions on fire drills, disaster management,
- Ensures all Agency lease requirements are met and that lease payments are processed in a timely manner.
- Monitors budget and track expenditures for Cannabis leased properties in collaboration with the Agency’s Budget Director and/or CFAO.
- Collaborates with the Human Resources and IT Departments to provide appropriate access to facilities is uniform across all Cannabis workspace and workplace locations.
- Participates in RTO and other facilities and fleet management meetings and provides appropriate updates where required.
- Works closely with Finance to manage the Agency’s procurement process and monitors all operational expenditures to ensure purchases are allocated according to budget.
- Collaborates with Agency’s parking facilities partners to provide reimbursements for employee parking at the Boston and Worcester workplace locations.
- Educates employees on parking access and reimbursement requirements.
- Manages Agency fleet vehicles in collaboration with the Fleet Manager, to ensure all vehicles are registered, insured, maintained, and are operating at an optimal level.
- Ensures all Cannabis facilities are well maintained, clean, and safe.

**PROFESSIONAL EXPECTATIONS****The Director of Operations:**

- Models the Agency’s mission, vision, and values
- Demonstrates the Agency’s commitment to maintaining Equity, Diversity, and Inclusion in all operational policies, practices, and activities.
- Demonstrates strong, clear, and respectful communication, teamwork, and collaboration,
- Demonstrates a high level of professionalism and ethical standards in communication and completion of work responsibilities.

*Note: The purpose of this job description is to provide an outline of the more significant work elements of the position and to organize and present the information in a standard manner. It is not intended to describe all the elements of the work that may be performed by every individual in this classification, nor should it serve as the sole basis for Human Resources decisions and actions.*

## COMPETENCIES, SKILLS, AND ATTRIBUTES

### The Operations Director must be able to:

- Communicate effectively and timely on a regular basis.
- Demonstrate consistent leadership in meeting the demands of the Agency's facilities and fleet management needs.
- Demonstrate the ability to manage contractual obligations and monitor expenditures.
- Manage in an ambiguous environment and juggles multiple priorities on a regular basis.
- Works under pressure and with tight deadlines.
- Effectively manage and organize workload, and deliver on critical tasks.
- Contributes to the overall strategic direction of the Agency.
- Ensures all state and federal regulatory reporting requirements are met annually and as otherwise required.

## QUALIFICATIONS AND REQUIREMENTS

- Bachelor's degree Business or other relevant field, with 5 years experience in a management or leadership role is required.
- 2+ years experience with procurement within large budget companies.
- Must understand licensure requirements and fleet management and maintenance processes.

## WORKING CONDITIONS

### Physical Demands:

- Must be able to lift, push, or pull up to 20 pounds.
- Must tolerate sitting, standing, or walking for extended periods of time.
- Must be sensitive to, and can manage frequent interruptions.
- Standard office environment with use of, and exposure to various office temperatures, and equipment such as computers, fax machines, copiers, etc.

## CANNABIS CONTROL COMMISSION OF CENTRAL MA – MISSION STATEMENT

The mission of the Cannabis Control Commission is to honor the will of the voters of Massachusetts by safely, equitably and effectively implementing and administering the laws enabling access to medical and adult-use marijuana in the Commonwealth.

The Commission will foster the creation of a safely regulated industry that will create entrepreneurial and employment opportunities and incremental tax revenues in and to communities across the state and which will be a best practice model for other states. The industry will be characterized by participation by small and larger participants and with full and robust participation by minorities, women and veterans. We will develop policies and procedures to encourage and enable full participation in the marijuana industry by people from communities that have previously been disproportionately harmed by marijuana prohibition and enforcement and positively impact those communities.

## OPERATING PRINCIPLES

The Commission promises to:

- Conduct all of our processes openly and transparently; and
- Engage in regular two-way communication with all concerned citizens, patients, health care providers and caregivers, partners, and other constituencies.

*Note: The purpose of this job description is to provide an outline of the more significant work elements of the position and to organize and present the information in a standard manner. It is not intended to describe all the elements of the work that may be performed by every individual in this classification, nor should it serve as the sole basis for Human Resources decisions and actions.*

Build a world-class state agency by:

- Committing to the highest level of constituent services using state-of-the-art technology and multiple media;
- Defining and publicly measuring our performance versus metrics regarding timely execution, accessibility, impact on public health and safety, impact on disproportionately harmed communities, and incremental tax revenue generation;
- Becoming self-funding and generating a revenue surplus; and
- Creating a great place to work.

Enhance and ensure public health and safety by:

- Developing and enforcing effective regulations;
- Developing and executing a program of continuing public education;
- Conducting and contributing to research on marijuana-related topics; and
- Using surplus funds to help address issues in these areas.

#### APPROVALS

<b>Executive Director</b>	<b>Date:</b>
<b>Chief People Officer</b>	<b>Date:</b>
<b>Chief Financial Officer</b>	<b>Date:</b>
<b>Employee's Supervisor</b>	<b>Date:</b>
<b>Employee's Signature:</b>	<b>Date:</b>

**COMPENSATION/PAY BAND:** The salary for this position falls within the Director range of: \$103k - \$130k

*Note: The purpose of this job description is to provide an outline of the more significant work elements of the position and to organize and present the information in a standard manner. It is not intended to describe all the elements of the work that may be performed by every individual in this classification, nor should it serve as the sole basis for Human Resources decisions and actions.*

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## Memorandum

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**To:** Commissioners  
**Cc:** Debra Hilton-Creek, Acting Executive Director; Cedric Sinclair, Chief Communications Officer  
**From:** Matt Giancola, Director of Government Affairs and Policy  
**Date:** December 14, 2023  
**Subject:** **December 2023 Government Affairs Update**

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### Municipal Update

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#### **Municipal Law Unit**

The Attorney General’s Municipal Law Unit (MLU) issued [two marijuana-related decisions](#) this past month:

Town of Hopedale: The MLU approved zoning by-laws which included a Marijuana Overlay District and map. The MLU did not approve an amendment regarding “curbside retail operations” because it conflicts with M.G.L. c. 94G, §1 and the Commission Regulations, 935 CMR 500. The provision allowed for the Police Chief to implement reasonable safety measures and other restrictions for curbside retail operations.

Town of Pembroke: The MLU approved an amendment to the zoning by-laws which created a Medical Marijuana Overlay District Zoning Map providing boundaries for where Registered Marijuana Dispensaries are allowed by special permit. The town has additional requirements to meet before the zoning map is effective however it is related to other bylaw provisions submitted by the town.



# Cannabis Control Commission

Monthly Public Meeting

December 14, 2023 at 10:00 a.m.

Via Microsoft Teams





# Agenda

1. Call to Order
2. Commissioners' Comments and Updates
3. Acting Chair Discussion and Vote
4. Minutes for Approval
5. Acting Executive Director and Commission Staff Report
6. Staff Recommendations on Changes of Ownership
7. Staff Recommendations on Renewals
8. Staff Recommendations on Provisional Licenses
9. Staff Recommendations on Final Licenses
10. Commission Discussion and Votes
11. New Business that the Chair did not Anticipate at the Time of Posting
12. Next Meeting Date and Adjournment

# Commission Updates

## **Evolution and Change**

- CCC as a Model Across the Country – High Performing Entity
- Redefine Leadership and Organizational Structure
- Appropriate Assignment of Talent
- Effective Use of Resources
- Implement Lean Principles
  
- **Development and Implementation of Short/Long Term Strategies**
- Stay True to Our Mission
- Revise/Set New Goals
- Transform Our Strategies Into “Projects”
- Measure/Evaluate Organizational Performance



# Commission Updates

## Development of an Organizational Training Plan

- Supports Effective Decision-Making
- Align Talent with Organizational Goals
- Effective Preparation to Pivot/Address Industry Changes
- Provides a Pathway to Improved Conflict Resolution

## Recruitment of Key Roles

### *Recruitment of the Executive Director*

- Deploy Commission Search Committee
- Develop New Job Description with High Level Qualifying Criteria
- **Internal Process:** Engage Commissioners/CPO/Senior Leadership Teams/EE Focus Groups
- **External Process:** Engage Executive Search Firm/Identify Networks as a Resource





# Commission Updates

## Recruitment of Key Roles (continued)

### **CIEO Recruitment**

- Review/Update Current Job Responsibilities
- May Require External Resources to Support the Process

### **DEI/EE Relations Director**

- New Role to the Agency, Critical to Our Success as a Collective Body

### Introduction and Welcome

- Acting CIEO

### Operations Director Job Description

- As the Agency grows, the need for this role becomes increasingly important.



# Update: Chapter 180 Regulations Implementation

## ➤ Steps Taken (As of December 7, 2023)

- Draft Charter Approved
- Staff Input on Draft Charter Being Received
- First Draft of Model HCA Complete – Under Additional Review
- Identification and Collection of Deliverables Underway (Originals)

## ➤ Draft Charter Highlights

- “All Hands-on Deck” Staff Approach
- Outline of Roles & Responsibilities
- Identification of Deliverables (@ 120 & Growing)
- General Timeline



# Update: Chapter 180 Regulations Implementation (cont.)

## ➤ Deliverables

- Around 120 deliverables have been identified so far—they fall into categories such as technology, policy/process documents, administrative notices/forms, internal/external communications, etc.
- Some priority deliverables include the following:
  - New and Modified MassCIP Applications
  - Data Capturing & Reporting
  - Guidance Documents
  - Model HCA
  - Website Updates

## ➤ Next Steps

- Acting ED's Approval of Final Charter
- Orientation/Formal Kick Off Meeting Tentatively Scheduled for 12/18/23





# Highlights from Licensing Data\*

- 4 applications awaiting first review
- 11 applications awaiting supplemental review
- 5 applications for Provisional License consideration
- 15 licensees for Final License consideration



# Licensing Applications | December 14, 2023

The totals below are number of approvals by stage.

Type	#
Pre-Certified/Delivery Endorsed Microbusiness	202
Provisionally Approved	134
Provisional License	533
Final License	56
Commence Operations	608
<b>Total</b>	<b>1,533</b>

➔ +31.6%

\* Note: This represents the percent increase since December 2022

*Provisionally approved means approved by the Commission but has not submitted license fee payment yet – provisional license has not started*





# Microbusiness Operations By Type | December 14, 2023

*The totals below reflect the operations types of all licensed Microbusinesses.*

Total Licensed Microbusinesses	Cultivation Only	Product Manufacturing Only	Cultivation and Product Manufacturing
30	9	3	18



# Minority-Owned Businesses (MBE) By Stage | December 14, 2023

*The total number of self-reported MBE licensees by stage.*

Provisional License	Final License	Commence Operations
83	8	53

# Non-Active Licenses By Stage | December 14, 2023

Type	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	1	0	0	1
Marijuana Courier License	3	1	2	6
Independent Testing Laboratory	0	0	0	0
Marijuana Cultivator	33	1	6	40
Marijuana Delivery Operator License	1	0	0	1
Marijuana Microbusiness	2	0	0	2
Marijuana Product Manufacturer	23	1	5	29
Marijuana Research Facility	0	0	0	0
Marijuana Retailer	20	0	3	23
Marijuana Transporter with Other Existing ME License	0	0	0	0
Microbusiness Delivery Endorsement	0	0	0	0
Third Party Transporter	0	0	0	0
Standards Laboratory	0	0	0	0
<b>Total</b>	<b>83</b>	<b>3</b>	<b>16</b>	<b>102</b>



# Licensing Applications | December 14, 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	11	N/A	0	1	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	2	1	15	21
Marijuana Cultivator	47	N/A	2	47	189	27	118	430
Marijuana Delivery Operator License	8	N/A	0	0	23	2	9	42
Marijuana Delivery Operator Pre-Certification	15	98	0	N/A	N/A	N/A	N/A	113
Marijuana Microbusiness	7	N/A	0	4	17	2	11	41
Marijuana Product Manufacturer	33	N/A	1	45	140	16	103	338
Marijuana Research Facility	5	N/A	0	1	1	0	0	7
Marijuana Retailer	54	N/A	2	32	141	7	333	569
Marijuana Transporter with Other Existing ME License	4	N/A	0	2	5	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
<b>Total</b>	<b>210</b>	<b>202</b>	<b>5</b>	<b>134</b>	<b>533</b>	<b>56</b>	<b>608</b>	<b>1,748</b>





# Staff Recommendations on Licensure

# Staff Recommendations: Changes of Ownership

1. Curaleaf Massachusetts, Inc.
2. Curaleaf North Shore, Inc.
3. Curaleaf Processing, Inc.
4. Ganesh Wellness, Inc.
5. In Good Health, Inc.
6. Nature's Alternative, Inc.
7. Northeastcann, Inc.
8. Turnbuckle Consulting Inc.



# Staff Recommendations: Renewals

1. Apothca, Inc (#MRR206692)
2. Apothca, Inc. (#MRR206706)
3. Aries Laboratories LLC (#ILR267926)
4. Aspen Blue Cultures Inc. (#MPR243919)
5. Aspen Blue Cultures Inc. (#MCR140403)
6. ATOZ Laboratories, Inc. (#ILR267930)
7. Aunty Budz LLC (#MBR169322)
8. Aura Cannabis Company LLC (#MCR140557)
9. Aura Cannabis Company LLC (#MRR206637)
10. BB Botanics LLC (#MRR206661)
11. BB Botanics LLC (#MCR140615)
12. Cannabis Connection, Inc (#MRR206686)
13. Caregiver-Patient Connection (#MCR140616)
14. Caregiver-Patient Connection LLC (#MCR140617)
15. Community Growth Partners Northampton Operations LLC (#MCR140587)
16. Coyote Cannabis Corporation (#MCR140600)
17. Coyote Cannabis Corporation (#MPR244079)
18. D2N2, LLC (#MRR206675)
19. dba EMJ LLC (#MCR140610)
20. Emerald City Growers Incorporated (#MCR140368)
21. Four Trees Holyoke LLC (#MRR206660)
22. Four Trees Holyoke LLC (#MCR140634)
23. Gibby's Garden LLC (#MBR169323)
24. Good Chemistry Nurseries of Massachusetts, LLC (#MPR244014)
25. Good Chemistry Nurseries of Massachusetts, LLC (#MCR140527)
26. Green Adventure LLC (#MRR206678)



# Staff Recommendations: Renewals

27. Green Era LLC (#MRR206685)
28. Green Era LLC (#MRR206689)
29. Green Era LLC (#MRR206682)
30. Greencare Collective LLC (#MRR206666)
31. Highdration LLC (#MPR244067)
32. Holland Brands NA, LLC (#MRR206672)
33. Hudson Botanical Processing, LLC (#MPR244078)
34. Infused Element, LLC (#MPR244095)
35. J&L Enterprises, Inc. (#MCR140622)
36. KG Collective Brockton, LLC (#MRR206619)
37. KindRun Massachusetts, LLC (#MDR272557)
38. KR D Growers, LLC (#MRR206704)
39. KR D Growers, LLC (#MCR140637)
40. KR D Growers, LLC (#MPR244100)
41. Mass Yield Cultivation LLC (#MCR140543)
42. Matriline Farms LLC (#MCR140631)
43. Matriline Farms LLC (#MPR244099)
44. Mint Retail Facilities LLC (#MRR206680)
45. Mission MA, Inc. (#MRR206500)
46. Mission MA, Inc. (#MRR206501)
47. Mission MA, Inc. (#MCR140522)
48. MMM Transport, Inc. (#MTR263111)
49. Nature's Alternative, Inc. (#MRR206691)
50. New Leaf Enterprises, Inc. (#MRR206632)
51. New Leaf Enterprises, Inc. (#MRR206622)
52. Pepperell Roots, LLC (#MCR140614)
53. Pepperell Roots, LLC (#MPR244077)
54. PharmaCannis Massachusetts, Inc. (#MRR206670)
55. Prime Tree LLC (#MCR140584)
56. Prime Tree LLC (#MPR244069)





# Staff Recommendations: Renewals

57. QPS Massachusetts Holdings LLC (#MPR244038)

58. QPS Massachusetts Holdings LLC (#MCR140561)

59. Reverie 73 Beverly LLC (#MRR206676)

60. Reverie 73 Gloucester LLC (#MRR206677)

61. SafeTiva Labs LLC (#ILR267931)

62. Sanctuary Medicinals, Inc. (#MPR244080)

63. Sanctuary Medicinals, Inc (#MCR140596)

64. Seaside Joint Ventures, Inc. (#MRR206714)

65. Silver Therapeutics, Inc. (#MRR206683)

66. TDMA LLC (#MRR206667)

67. The Blue Jay Botanicals, Inc. (#DOR5182964)

68. The Heirloom Collective, Inc. (#MRR206711)

69. Treevit LLC (#DOR5182963)

70. Western Front, LLC (#MRR206705)

71. Apothca, Inc. (#RMD1667)

72. Apothca, Inc. (#RMD1065)

73. Beacon Compassion Inc. (#RMD1729)

74. FFD Enterprises MA, Inc. (#RMD1165)

75. Heka Incorporated (#RMD1385)

76. MD Holistics, Inc. (#RMD1606)

77. PharmaCannis Massachusetts, Inc. (#RMD1688)

78. Resinate, Inc. (#RMD1345)



# Staff Recommendations: Provisional Licenses

1. CommCan, Inc. (#MRN284925), Retail
2. Flora Holdings, LLC (#MRN284981), Retail
3. FreeMarketMA, LLC (#MPN282279), Product Manufacturing
4. New England Organics, LLC (#MRN281936), Retail
5. Yellow House Cannabis, LLC (#MRN284969), Retail



# Staff Recommendations: Final Licenses

1. 617 Therapeutic Health Center, Inc. (#MC28414), Cultivation, Tier 2 / Indoor
2. Charles River Remedies, LLC (#MR283511), Retail
3. Grass Appeal, LLC (#MC282123), Cultivation, Tier 3 / Indoor
4. Green Flash Delivery, LLC (#MD1298), Marijuana Delivery Operator
5. Health Circle, Inc. (#MC281787), Cultivation, Tier 2 / Indoor
6. Hoop City Ventures, LLC (#MR284806), Retail
7. MRM Industries, LLC (#MP281798), Product Manufacturing
8. Natural Agricultural Products, LLC (#MR284177), Retail
9. Pioneer Valley Trading Company, LLC (#MR284022), Retail
10. Sweetgrass Botanicals, LLC (#MP282058), Product Manufacturing



# Staff Recommendations: Final Licenses

11. Sweetgrass Botanicals, LLC (#MR284185), Retail
12. Theory Wellness, Inc. (#MR284150), Retail
13. Twisted Growers, LLC (#MC281714), Cultivation, Tier 11 / Indoor
14. Twisted Growers, LLC (#MP281909), Product Manufacturing
15. Union Twist, Inc. (#MR284038), Retail
16. Grass Appeal, LLC (#MTC3770), Vertically Integrated Medical Marijuana Treatment Center
17. Green Gold Group (#MTC3831), Vertically Integrated Medical Marijuana Treatment Center





**The Commission is in recess  
until 11:40**



# Commission Discussion & Votes



# Regulatory Review Discussion: Delivery License Type

December 14, 2023

*Acting Chair Commissioner Concepcion and Commissioner Camargo*



# Agenda

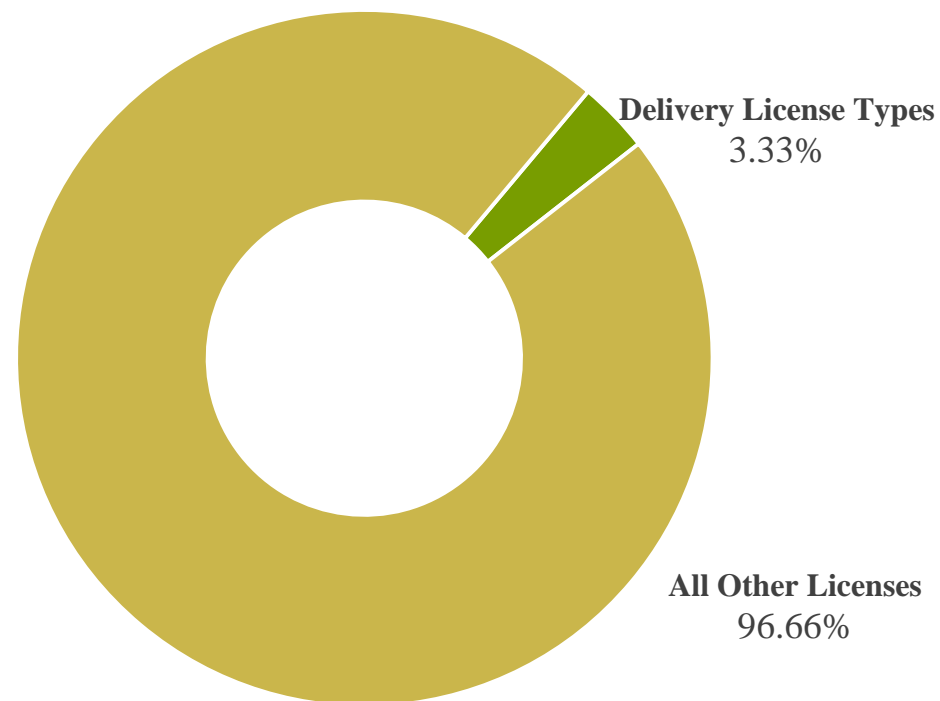
1. About the Delivery Licenses
2. Snapshot of Delivery Business Owners
3. Current Landscape of Delivery Applications
4. Cross-State Delivery Regulations & Reported Incidents
5. Policy Topics for Discussion
  - a) Two Agents in a Vehicle
  - b) License Caps
  - c) Repackaging for Delivery Operators
  - d) Delivery to "No" Towns
  - e) Delivery to Hotels - *(update)*



# About the Delivery License

- Massachusetts is the **only State** that exclusively offers certain Marijuana Establishment Licenses to equity applicants.
- Out of 600 Marijuana Establishments who have commenced operations, 20 are a Delivery, Courier or Microbusiness with Delivery Endorsement.
- The three-year *Exclusivity Period* began on April 1, 2022.

Delivery License Types vs. All Licenses  
*with Commence Operations*

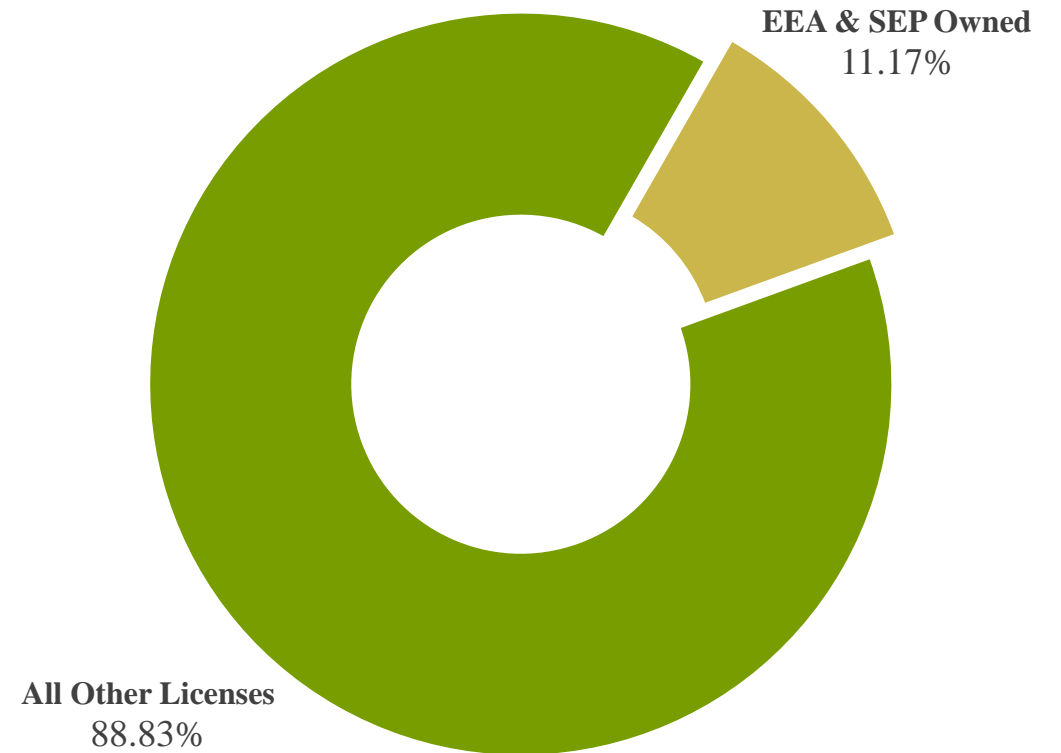


# SEP & EEA Licensed Businesses

## SEP & EEA Businesses with at least a Provisional License

Type of Business	Total
Craft Marijuana Cooperative	1
Marijuana Courier License	24
Independent Testing Laboratory	0
Marijuana Cultivator	38
Marijuana Delivery Operator	35
Marijuana Microbusiness	6
Marijuana Product Manufacturer	37
Marijuana Research Facility	0
Marijuana Retailer	78
Marijuana Transporter with Other Existing ME License	6
Microbusiness Delivery Endorsement	1
Third Party Transporter	0
Standards Laboratory	0

## EEA & SEP Businesses vs. All Businesses *with Commence Operations*



# Current Landscape of Delivery Licenses

*All Delivery, Courier and Microbusinesses Applications and Licenses as of December 1, 2023*

	Social Equity Participant	Economic Empowerment Applicant	Total
Pending Pre-Certification	9	3	13
Pre-Certified	186	46	237
Pending Application	18	4	22
Provisionally Approved	1	-	1
Provisional License	27	8	35
Final License	3	-	3
Commence Operations	14	6	21
Denied	-	-	0
Expired	2	-	2
<b>Total</b>	<b>260</b>	<b>67</b>	<b>334</b>

# Cross-State Delivery Agents and Reported Incidents

- Massachusetts is the only adult use state to **always require 2 agents** in the vehicle.
  - Connecticut- Requires 2 agents per vehicle only when vehicle contains more than 2 lbs. of cannabis plants or material.
  - Nevada- Requires 2 agents if the value of products exceeds \$25,000.
  - New Jersey- Deliveries may be conducted by a single person; provided another person, has access to real-time GPS tracking.
- The majority of other states with Delivery Operators, have reported minimal incidents involving Delivery Operations.
  - California & Michigan- Do not require body cameras on agents.
  - Nevada-
    - Employee negligence is the main cause of reported incidents.
    - In the past 6 months there were 4 thefts of less than an ounce.



# Policy Topics Recap and Discussion

1. Two Agents in a Vehicle
2. License Caps
3. Repackaging for Delivery Operators
4. Delivery to "No" Towns
5. Delivery to Hotels (*Update*)



# Policy Topics for Discussion

## Two Agents in a Vehicle

- **Current Regulations**
  - Two registered agents must be in the delivery vehicle when performing home deliveries.
  - One registered agent must always remain in the vehicle.
- **Current Security Measures**
  - Maximum retail value of product at any one time is limited to \$10,000.
  - Vehicles must be unmarked, contain a secure communication device, have a GPS, and secure locked storage compartment that is not easily removed from the vehicle.
  - Each Agent must wear a body camera that is turned on during all deliveries and footage retained for 30 days.

## License Caps

- Statute 94G §16  
No licensee shall be granted more than 3 marijuana retailer licenses, 3 medical marijuana treatment center licenses, 3 marijuana product manufacturer licenses or 3 marijuana cultivator licenses; provided, however, that a licensee may hold 3 marijuana retailer licenses, 3 medical marijuana treatment center licenses, 3 marijuana product manufacturer licenses and 3 marijuana cultivator licenses.
- Upon promulgation of regulations in 2020, the Commission prevented a single entity from holding direct or indirect control over more than two Marijuana Delivery Operator or Marijuana Courier licenses.



# Policy Topics for Discussion

## Repackaging for Delivery Operators

- Repackage means to uniformly wrap or seal Marijuana that has already been wrapped or sealed, into a ready-made product for retail sale, without combining, infusing, or changing the chemical composition of the Marijuana.
- Who can repackage Marijuana
  - Marijuana Retailers
  - Marijuana Treatment Centers

## Delivery to "No" Towns

- 124 out of 351 municipalities are considered "no delivery" towns.
- Current regulations allow for MTC delivery to "no delivery" towns.
- Maine, New Jersey, and California allow marijuana deliveries regardless of whether their municipality has opted in to permit operation of cannabis businesses within their community.





# Discussion



# Motion Language

1. Move to direct the sponsoring Commissioner to confer with Compliance, Legal, and Policy staff to develop and draft regulations modifying the Marijuana Courier, Marijuana Delivery Operator, and Marijuana Establishment with Delivery endorsement license types to allow these licensees the option of delivering marijuana and marijuana products to consumers, with one Marijuana Establishment agent in a vehicle at a time. The sponsoring Commissioner shall present the draft regulations at a future meeting for the full Commission's deliberation and vote.
2. Move to direct the sponsoring Commissioner to confer with Compliance, Legal, and Policy staff to develop and draft regulations modifying the ownership and control regulations for individuals and licensees to own and control no more than 3 Delivery Licenses. The sponsoring Commissioner shall present the draft regulations at a future meeting for the full Commission's deliberation and vote.

# Motion Language

3. Move to direct the sponsoring Commissioner to confer with Compliance, Legal, and Policy staff to develop and draft regulations modifying the Marijuana Delivery Operator license type to allow these licensees to repackage marijuana and marijuana products, subject to and in compliance with all current requirements of repackaging,. The sponsoring Commissioner shall present the draft regulations are a future meeting for the full Commission's deliberation and vote.

# Commission Discussion & Votes

## 2. COVID Administrative Orders

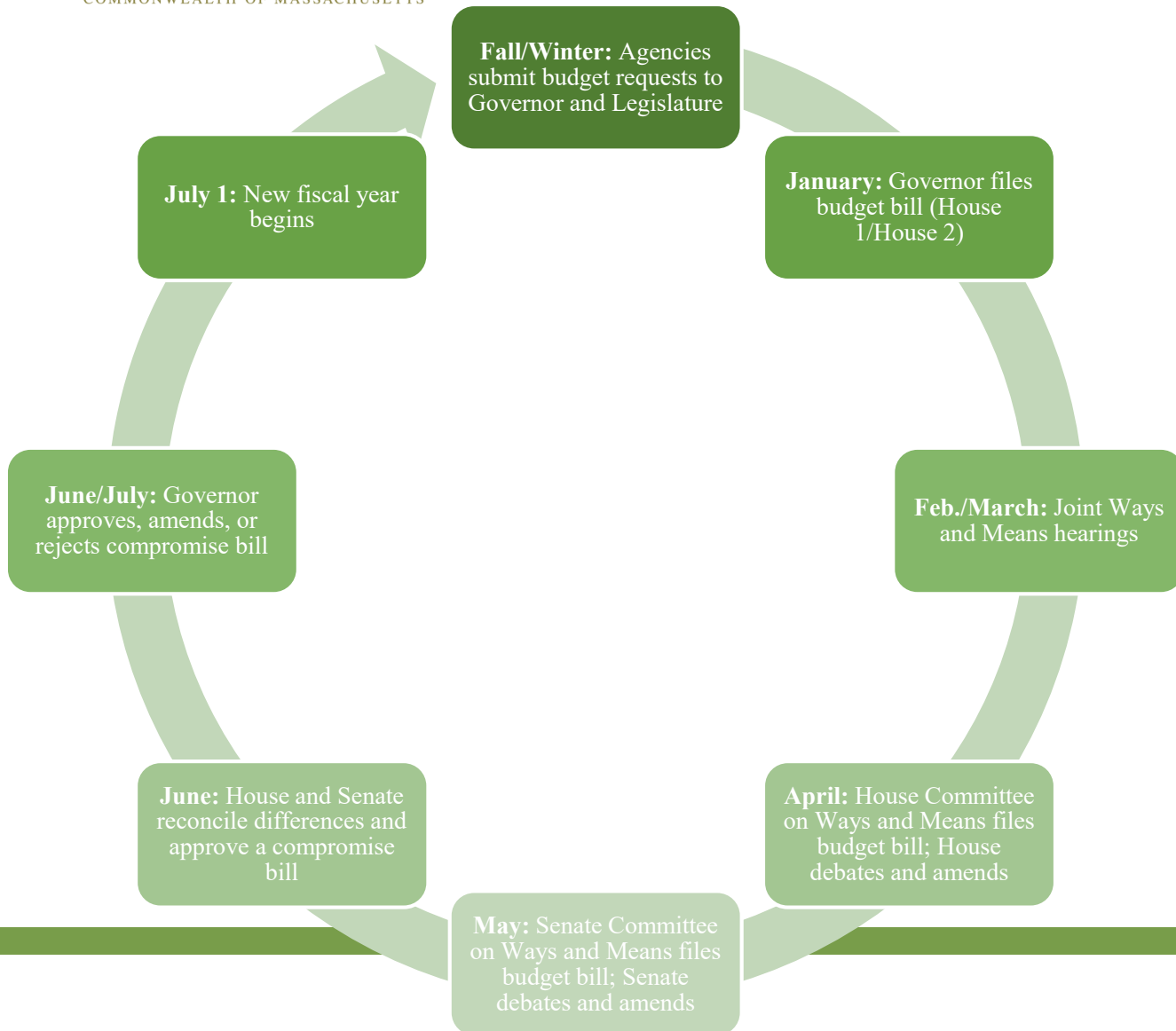




# FY25 Budget Request





December 2023

# State Operating Budget 101



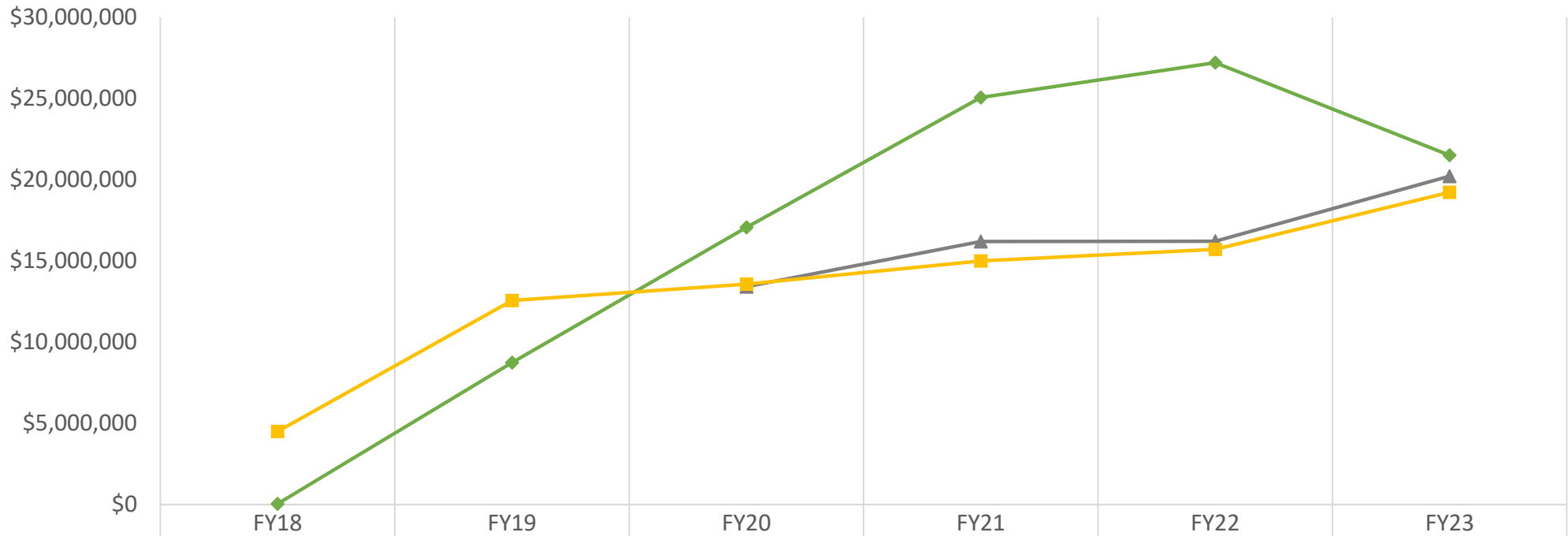
- The state fiscal year runs from July 1 to June 30.
- The budget planning process for each fiscal year kicks off in the fall/winter of the preceding calendar year, culminating in the final budget bill approved by the Legislature and the Governor before July 1.
- The Commission’s funding is drawn from the state’s operating budget; therefore, it is subject to this process every year.
- In preparation for the next fiscal year budget, the Commission submits spending and revenue estimates to the Governor’s and Legislature’s budget staff starting in October.
- During the year, the Commission may receive additional funds through supplemental budget bills.

# Internal Budget Process

Calculating FY25 baseline costs 	Also referred to as “ <b>maintenance</b> ,” the Finance department estimates the next fiscal year’s cost of maintaining staff, contracts, equipment, and other costs.
Gathering Department Head feedback on FY25 requests 	Based on Executive Director guidance, Department Heads submitted requests for FY25 staffing and non-payroll costs <b>over and above</b> baseline.
Gathering Commissioner feedback on FY25 requests 	The Acting Executive Director and former COO met with each Commissioner to discuss priorities for the FY25 budget.
Reviewing Department Head requests and Commissioner priorities 	The Acting Executive Director reviewed requests with members of leadership and Finance to discuss financial and practical implications.
Finalizing the FY25 budget request for Commission approval	The Acting Executive Director finalized decisions for the FY25 budget request for Commission consideration and approval.

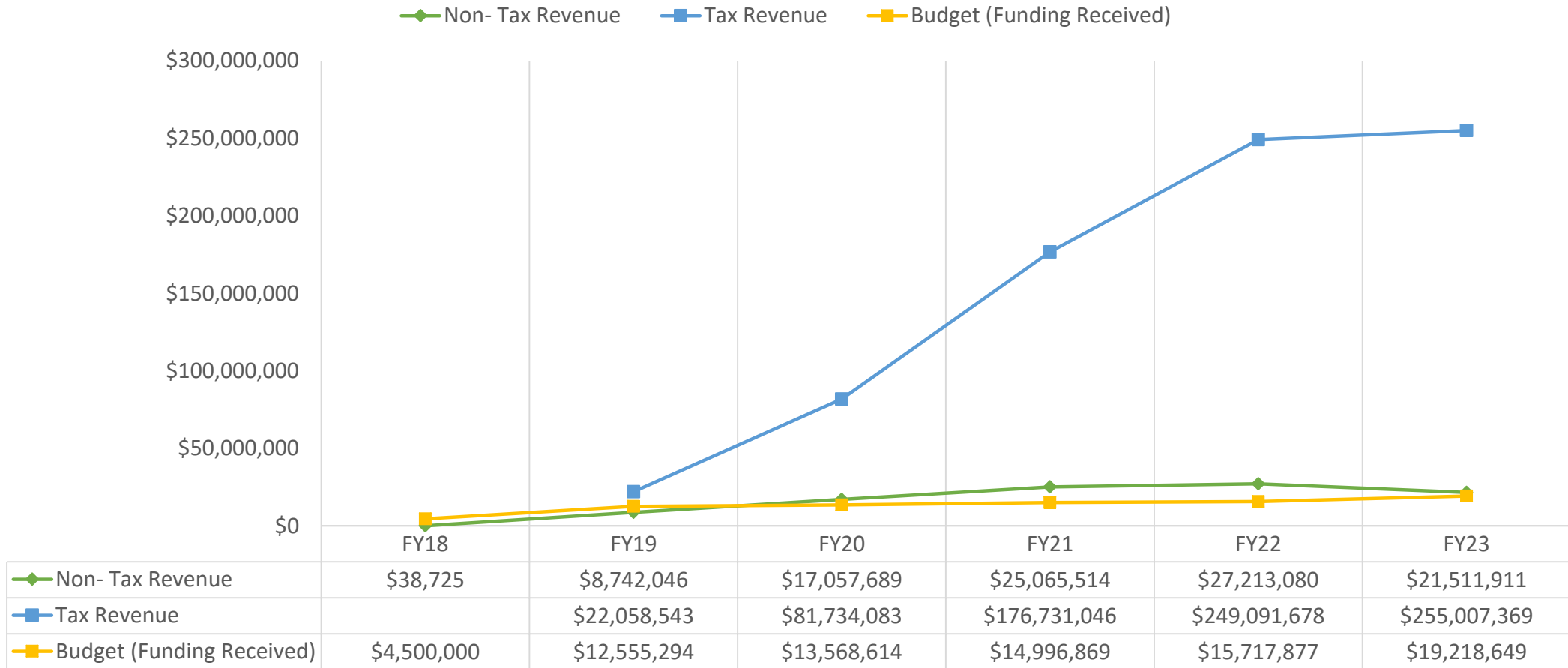
# Non-Tax Revenue Collections vs Funding

◆ Non- Tax Revenue   
 ▲ Budget Request   
 ■ Budget (Funding Received)



<span style="color: green;">◆</span> Non- Tax Revenue	\$38,725	\$8,742,046	\$17,057,689	\$25,065,514	\$27,213,080	\$21,511,911
<span style="color: gray;">▲</span> Budget Request			\$13,419,742	\$16,192,611	\$16,209,408	\$20,218,649
<span style="color: orange;">■</span> Budget (Funding Received)	\$4,500,000	\$12,555,294	\$13,568,614	\$14,996,869	\$15,717,877	\$19,218,649

# Revenue Collections vs Funding



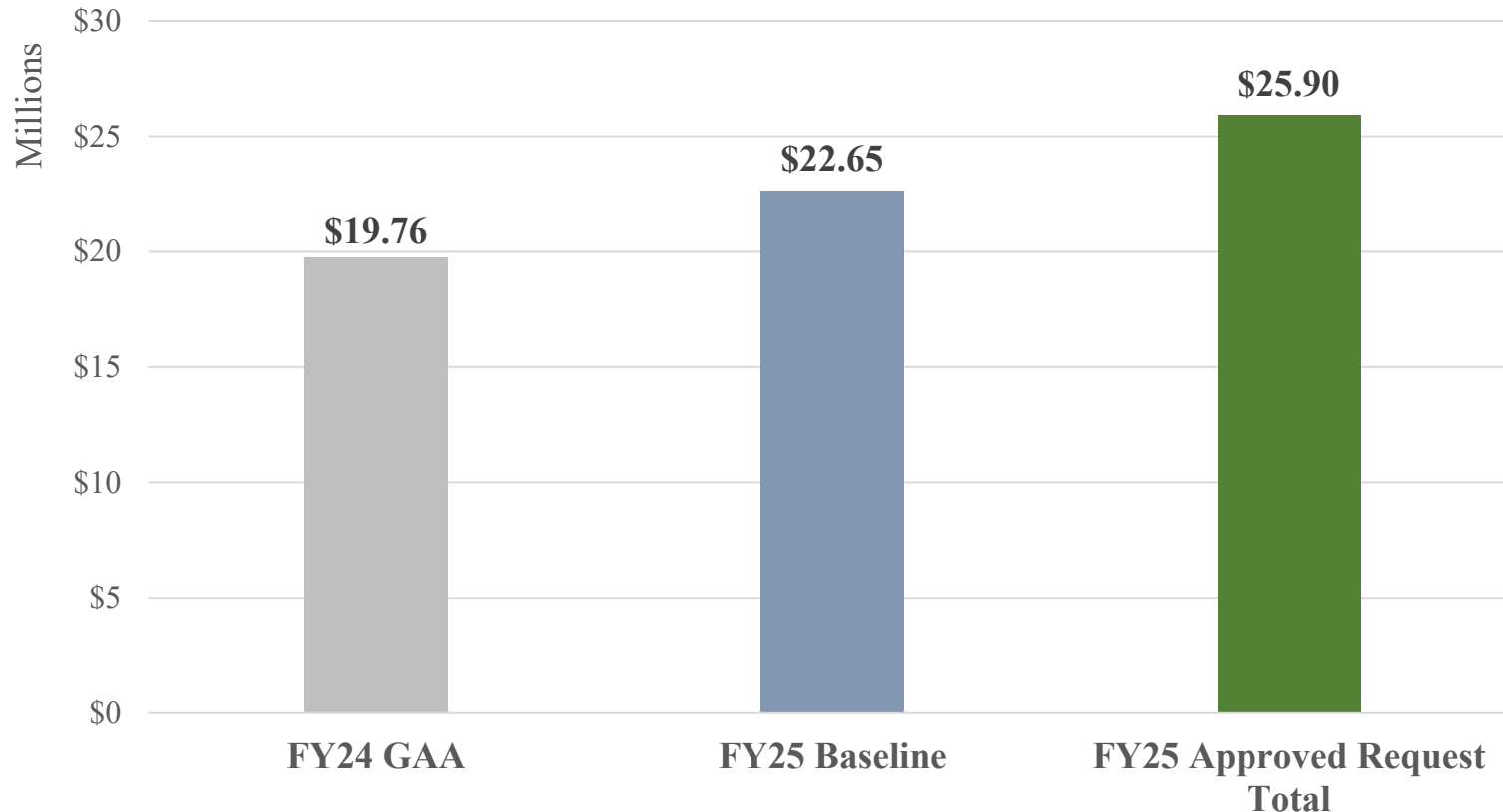


# Executive Director FY25 Guidance

- The Executive Director's guidance to Department Heads set the general focus of our FY25 budget:
  - **Technology Review** particularly adjustments to the following:
    - Re-competition of our seed-to-sale and licensing contracts
    - Continued implementation of case management
    - Starting an expanded open data program
    - Implementation of revised statute and regulations
- Executive Director asked Department Heads to consider:
  - How their requests impact other Departments, particularly capacity within IT and HR
  - Realistic timeframe for implementation, with a view towards planning for FY25-FY26
  - Implications of supporting regulatory requirements in FY24 into FY25
- Each Department Head developed the FY25 request based on Executive Director guidance and past and projected spending figures from Finance.

# FY25 Budget Request

**Commission's total budget request for FY25  
would be \$25.90 million.**



- This chart shows:
  - **FY24 GAA** – the total budget approved by the Legislature and Governor
  - **FY25 Baseline** – our maintenance estimate
  - **FY25 Acting Executive Director Approved Request Total** – the total budget as approved by the Executive Director
- Based on the Acting Executive Director’s decisions, the **total FY25 budget request is \$25.90 million.**

# FY25 Budget Request by Line Item

- The table below provides the breakdown of our budget figures by each line item.
  - The FY25 request for CNB Operations and Medical Use of Marijuana total **\$24.4M**
  - With the addition of the Public Education line item, the total request is \$25.9M
  - The FY25 request total of \$25.9M represents a \$6.1 million, or 31.1%, increase over FY24 GAA.\*
- \* Part of the increase is attributed to the addition of the Public Education line item, which was not funded in the FY24 budget.

Line Item	FY24 GAA	FY25 Maintenance	FY25 Request	Request vs. Maintenance	Request vs. FY24 GAA	% Request vs. FY24 GAA
<b>1070-0840, CNB Operations</b>	\$16,232,004	\$18,952,248	\$20,404,510	\$1,452,262	\$4,172,506	25.7%
<b>1070-0841, Public Education</b>	\$0	\$0	\$1,500,000	\$1,500,000	\$1,500,000	100.0%
<b>1070-0842, Medical-Use of Marijuana</b>	\$3,531,738	\$3,694,918	\$3,997,168	\$302,250	\$465,430	13.2%
<b>TOTAL</b>	<b>\$19,763,742</b>	<b>\$22,647,166</b>	<b>\$25,901,678</b>	<b>\$3,254,512</b>	<b>\$6,137,936</b>	<b>31.1%</b>

# FY25 Budget Request

- Commission staff therefore recommend the approval of the following FY 2025 budget request:

Line Item	FY25 Request
<b>1070-0840, CNB Operations</b>	\$20,404,510
<b>1070-0841, Public Education</b>	\$1,500,000
<b>1070-0842, Medical-Use of Marijuana</b>	\$3,997,168
<b>TOTAL</b>	<b>\$25,901,678</b>

# Commission Discussion & Votes

4. CY 2023 Secretary's Report

5. Job Description: Director of Operations





**The Commission is  
in Executive Session**



# Upcoming Meetings & Adjournment

# Upcoming Meetings and Important Dates

*Public Meeting dates are tentative and subject to change*

**Next Meeting Date**

**January 11, 2024**  
Monthly Public Meeting  
Remote via Teams  
10:00am

2024 Public Meetings*	
February 8	August 8
March 7	September 12
April 11	October 10
May 9	November 14
June 13	December 12
July 11	







# Additional Licensing Data

# Licensing Applications | December 14, 2023

*The totals below are all license applications received to date.*

Type	#
Pending	210
Withdrawn	1,320
Incomplete	7,969
Denied	5
Approved: Delivery Pre-certifications	198
Approved: Delivery Endorsements	5
Approved: Licenses	1,330
<b>Total</b>	<b>11,037</b>



# Licensing Applications | December 14, 2023

*The totals below are number of licenses approved by category.*

Type	#
Craft Marijuana Cooperative	4
Marijuana Courier	23
Marijuana Delivery Operator	34
Independent Testing Laboratory	20
Marijuana Cultivator	381
Marijuana Microbusiness	34
Marijuana Product Manufacturer	304
Marijuana Research Facility	2
Marijuana Retailer	513
Marijuana Third Party Transporter	5
Marijuana Transporter with Other Existing ME License	10
<b>Total</b>	<b>1,330</b>



# Licensing Applications | December 14, 2023

Status	#
Application Submitted: Awaiting Review	3
Application Reviewed: More Information Requested	192
Application Deemed Complete: Awaiting 3rd Party Responses	10
All Information Received: Awaiting Commission Consideration	5
Applications Considered by Commission (includes Delivery Pre-Cert)	1,538
<b>Total</b>	<b>1,748</b>



# Licensing Applications | December 14, 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)	11
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)	15
Marijuana Microbusiness	7
Marijuana Product Manufacturer	33
Marijuana Research Facility	5
Marijuana Retailer	54
Marijuana Transporter with Other Existing ME License	4
Microbusiness Delivery Endorsement	1
Third Party Transporter	9
<b>Total</b>	<b>210</b>



# Licensing Applications | December 14, 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	42	172	23	98	<b>373</b>
Marijuana Cultivator (Outdoor)	10	N/A	1	5	17	4	23	<b>60</b>
<b>Total</b>	<b>47</b>	<b>N/A</b>	<b>2</b>	<b>47</b>	<b>189</b>	<b>27</b>	<b>121</b>	<b>433</b>



# Licensing Applications | December 14, 2023

Of 1,533 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	24	134
Provisional License	32	89	107	533
Final License	2	5	6	56
Commence Operations	25	42	74	608
<b>Total</b>	<b>113</b>	<b>320</b>	<b>239</b>	<b>1,533</b>

0%

↑ 2%

0%

\* Note: This represents the increase since December 2022



# Licensing Applications | December 14, 2023

*The totals below are distinct license numbers that have submitted all required packets.*

**The 1,748 applications represent 988 separate entities**

Type	#
MTC Priority	255
Economic Empowerment Priority	133
Expedited Review	656
General Applicant	704
<b>Total</b>	<b>1,748</b>

Type	#
Expedited: License Type	80
Expedited: Social Equity Participant	325
Expedited: Disadvantaged Business Enterprise	194
Expedited: Two or More Categories	57
<b>Total</b>	<b>656</b>





# Licensing Applications – EE Only | December 14, 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	31	0	N/A	N/A	N/A	N/A	33
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	15	0	N/A	N/A	N/A	N/A	16
Marijuana Microbusiness	0	N/A	0	0	0	0	0	0
Marijuana Product Manufacturer	1	N/A	0	4	2	0	2	9
Marijuana Research Facility	1	N/A	0	0	0	0	0	1
Marijuana Retailer	5	N/A	0	4	17	2	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
<b>Total</b>	<b>17</b>	<b>46</b>	<b>0</b>	<b>12</b>	<b>32</b>	<b>2</b>	<b>25</b>	<b>134</b>



# Licensing Applications – SEP Only | December 14, 2023

Type	Pending Application	Pre-Certified Endorsement	Initial License Declined	Provisionally Approved	Provisional License	Final License	Commence Operation	Total
Craft Marijuana Cooperative	1	N/A	0	0	1	0	0	2
Marijuana Courier License	7	N/A	0	1	7	1	7	23
Marijuana Courier Pre-Certification	8	92	0	N/A	N/A	N/A	N/A	100
Independent Testing Laboratory	0	N/A	0	0	0	0	0	0
Marijuana Cultivator	4	N/A	0	7	18	0	6	35
Marijuana Delivery Operator License	5	N/A	0	0	20	2	7	34
Marijuana Delivery Operator Pre-Certification	11	94	0	N/A	N/A	N/A	N/A	105
Marijuana Microbusiness	1	N/A	0	0	5	0	1	7
Marijuana Product Manufacturer	6	N/A	0	6	15	1	7	35
Marijuana Research Facility	1	N/A	0	0	0	0	0	1
Marijuana Retailer	15	N/A	1	4	21	1	12	54
Marijuana Transporter with Other Existing ME License	1	N/A	0	1	2	0	1	5
Microbusiness Delivery Endorsement	1	5	0	0	0	0	1	7
Third Party Transporter	4	N/A	0	0	0	0	0	4
Standards Laboratory	0	N/A	0	0	0	0	0	0
<b>Total</b>	<b>65</b>	<b>191</b>	<b>1</b>	<b>19</b>	<b>89</b>	<b>5</b>	<b>42</b>	<b>412</b>



# Cultivation Applications | December 14, 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	5	37	6	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.)	6	2	9	42	3	20	82
Cultivation Tier 4 (20,001-30,000 sq. ft.)	1	0	4	13	3	11	32
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	0	6	21
Cultivation Tier 7 (50,001-60,000 sq. ft.)	2	0	1	4	1	4	12
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
<b>Total</b>	<b>47</b>	<b>0</b>	<b>50</b>	<b>195</b>	<b>28</b>	<b>124</b>	<b>446</b>
<b>Total Maximum Canopy (Sq. Ft.)</b>	<b>1,735,000</b>	<b>40,000</b>	<b>1,620,000</b>	<b>4,965,000</b>	<b>575,000</b>	<b>3,640,000</b>	

+61%

+12%

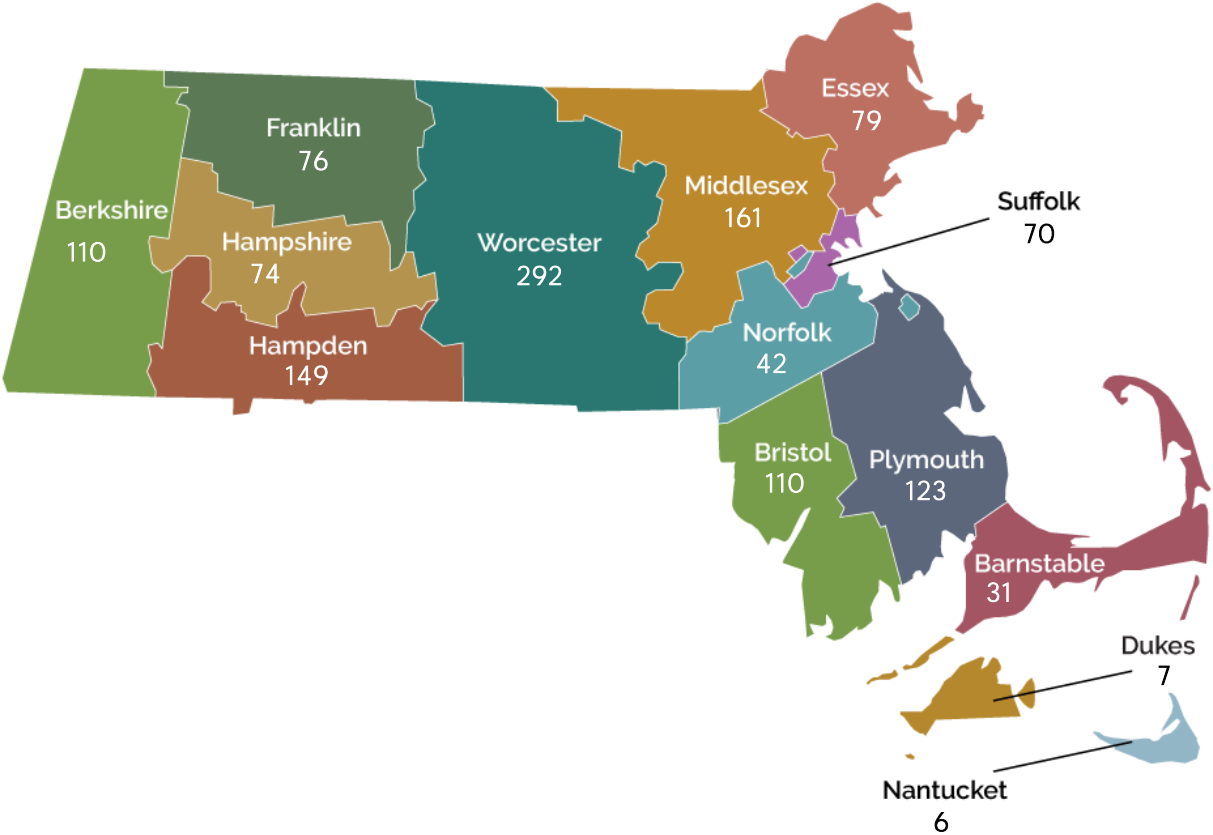
\* Note: percentage is of “Total” commence operations licenses



# Marijuana Establishment Licenses | December 14, 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	0
Hampshire	74	0
Middlesex	161	2
Nantucket	6	0
Norfolk	42	0
Plymouth	123	1
Suffolk	70	0
Worcester	292	0
<b>Total</b>	<b>1,330</b>	<b>3</b>



# MMJ Licensing and Registration Data | December 14, 2023

*The numbers below are a snapshot of the program for the month of December.*

MTC Licenses	#
Provisional	26
Final	1
Commence Operations	<b>103</b>
License Expired	61
<b>Total</b>	<b>191</b>

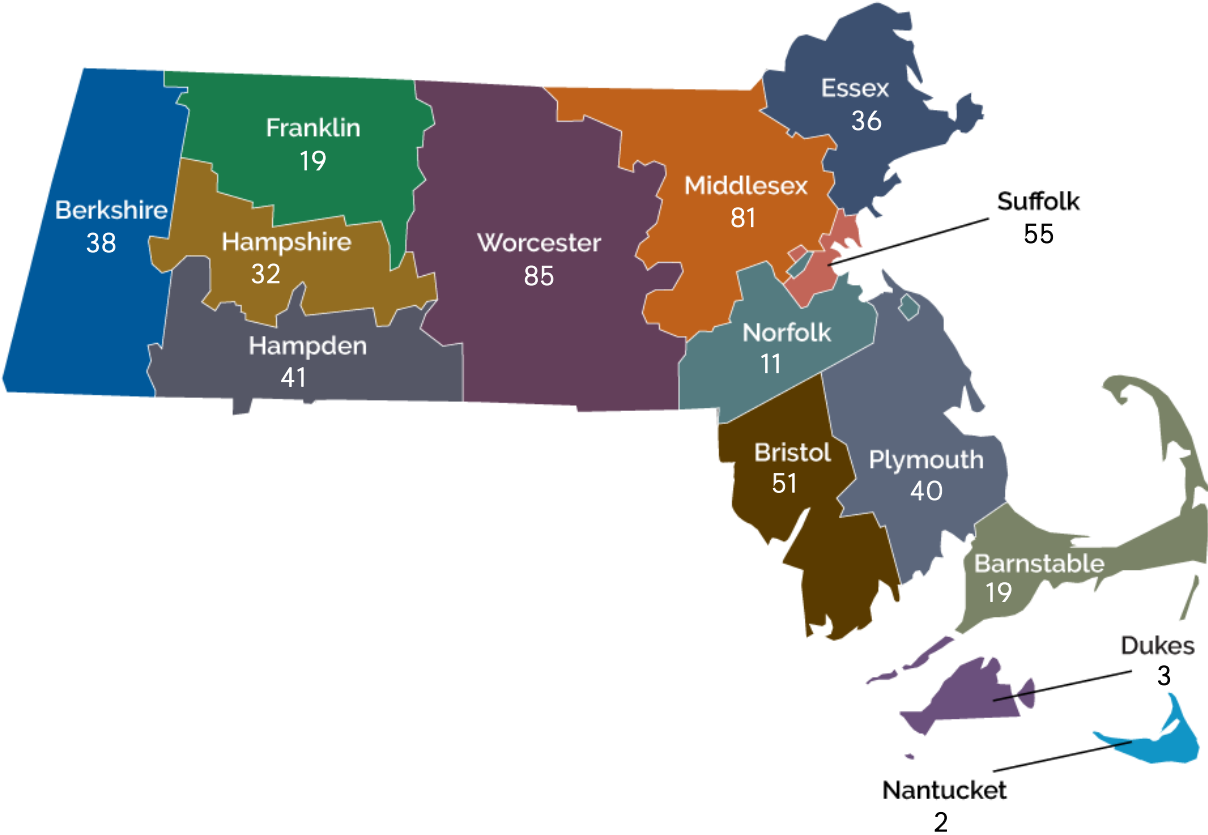
MMJ Program	#
Certified Patients	97,865
Certified Active Patients	92,243
Active Caregivers	7,065
Registered Certifying Physicians	324
Registered Certifying Nurse Practitioners	118
Registered Physician Assistants	1
Ounces Sold	95,931



# Marijuana Retailer Licenses | December 14, 2023

The totals below are the total number of retail licenses by county.

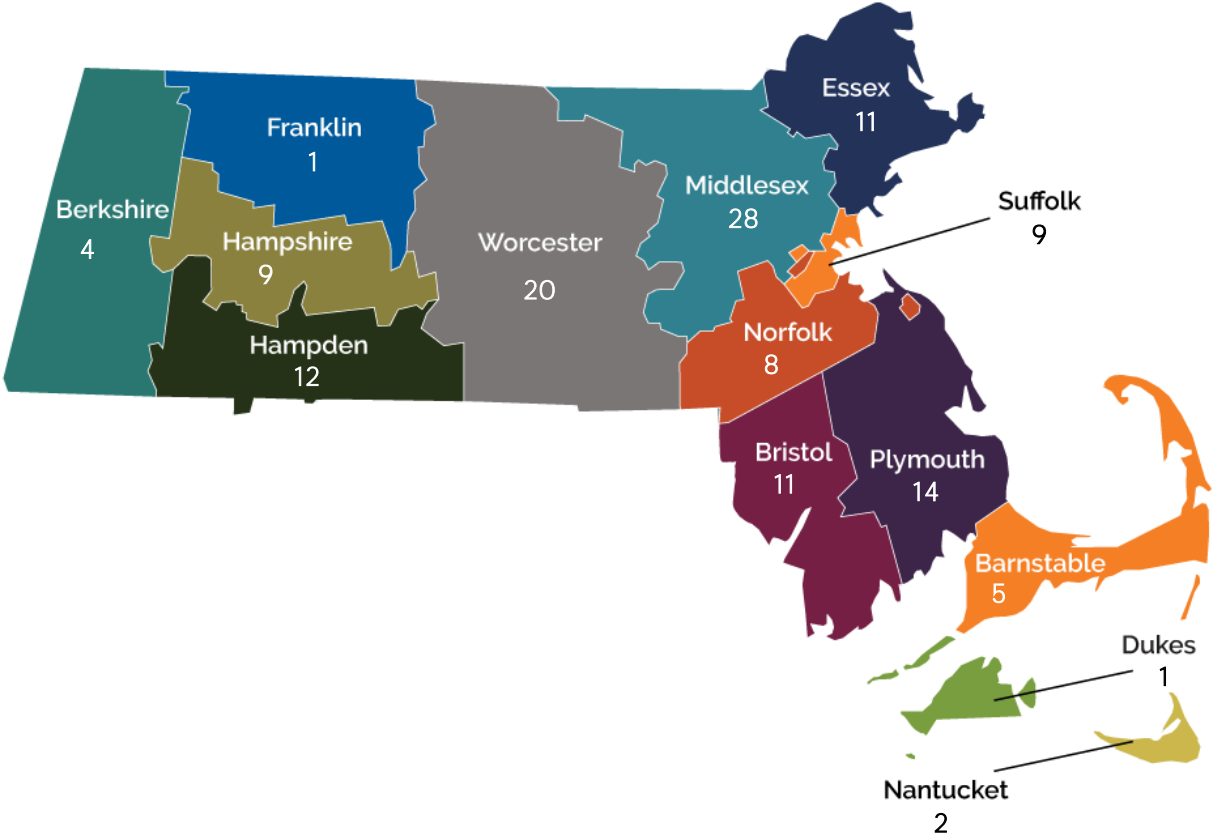
County	#	+/-
Barnstable	19	0
Berkshire	38	0
Bristol	51	0
Dukes	3	0
Essex	36	0
Franklin	19	0
Hampden	41	0
Hampshire	32	0
Middlesex	81	2
Nantucket	2	0
Norfolk	11	0
Plymouth	40	1
Suffolk	55	0
Worcester	85	0
<b>Total</b>	<b>513</b>	<b>3</b>



# Medical Marijuana Treatment Center Licenses (Dispensing) December 14, 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
<b>Total</b>	<b>135</b>

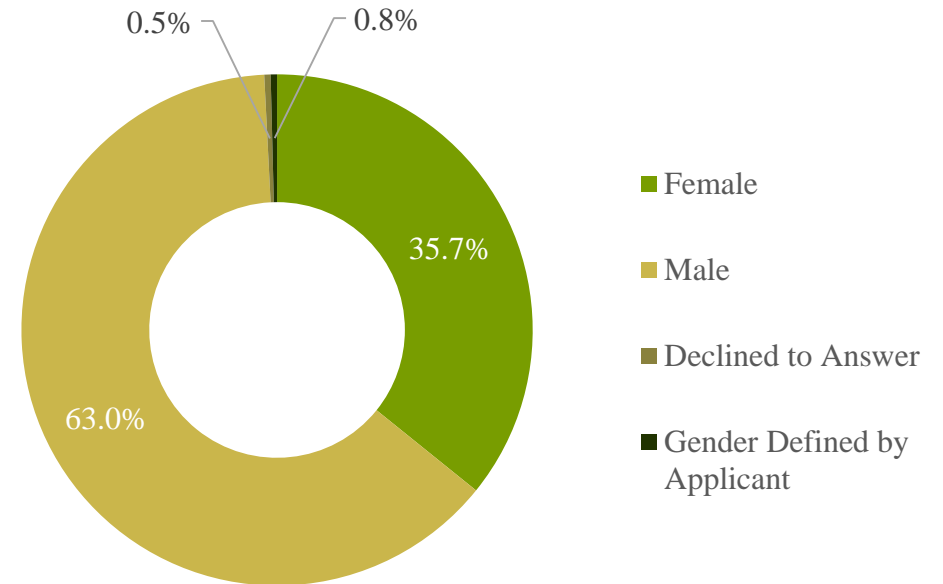


# Agent Applications | December 14, 2023

*Demographics of Approved and Pending Marijuana Establishment Agents*

Gender	#	%
Female	8,076	35.7%
Male	14,279	63.0%
Declined to Answer	176	0.8%
Gender Defined by Applicant	104	0.5%
<b>Total</b>	<b>22,635</b>	<b>100.0%</b>

Gender of Approved and Proposed Agents



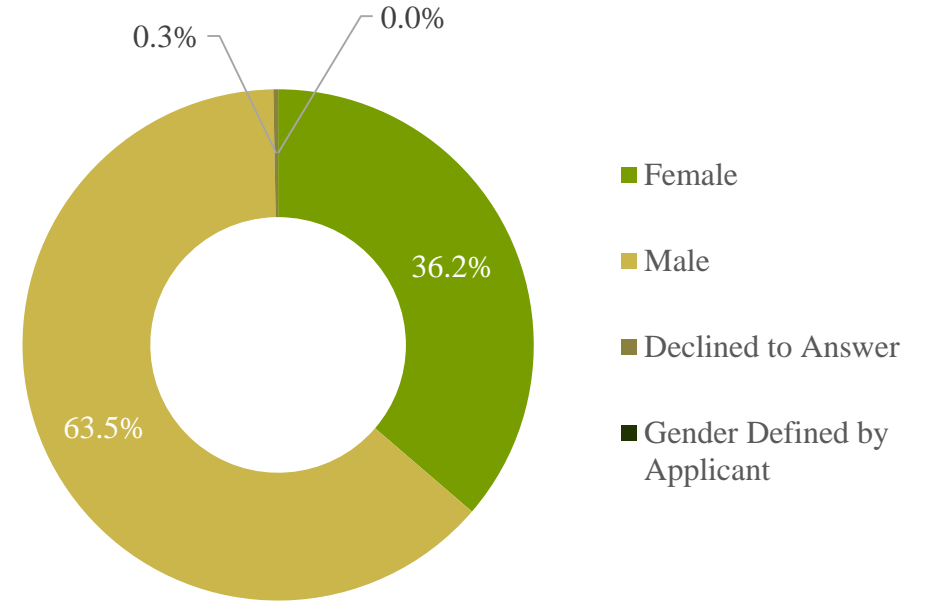


# Agent Applications | December 14, 2023

*Demographics of Approved and Pending Medical Marijuana Treatment Center Agents*

Gender	#	%
Female	2,717	36.2%
Male	4,762	63.5%
Declined to Answer	26	0.3%
Gender Defined by Applicant	0	0.0%
<b>Total</b>	<b>7,505</b>	<b>100.0%</b>

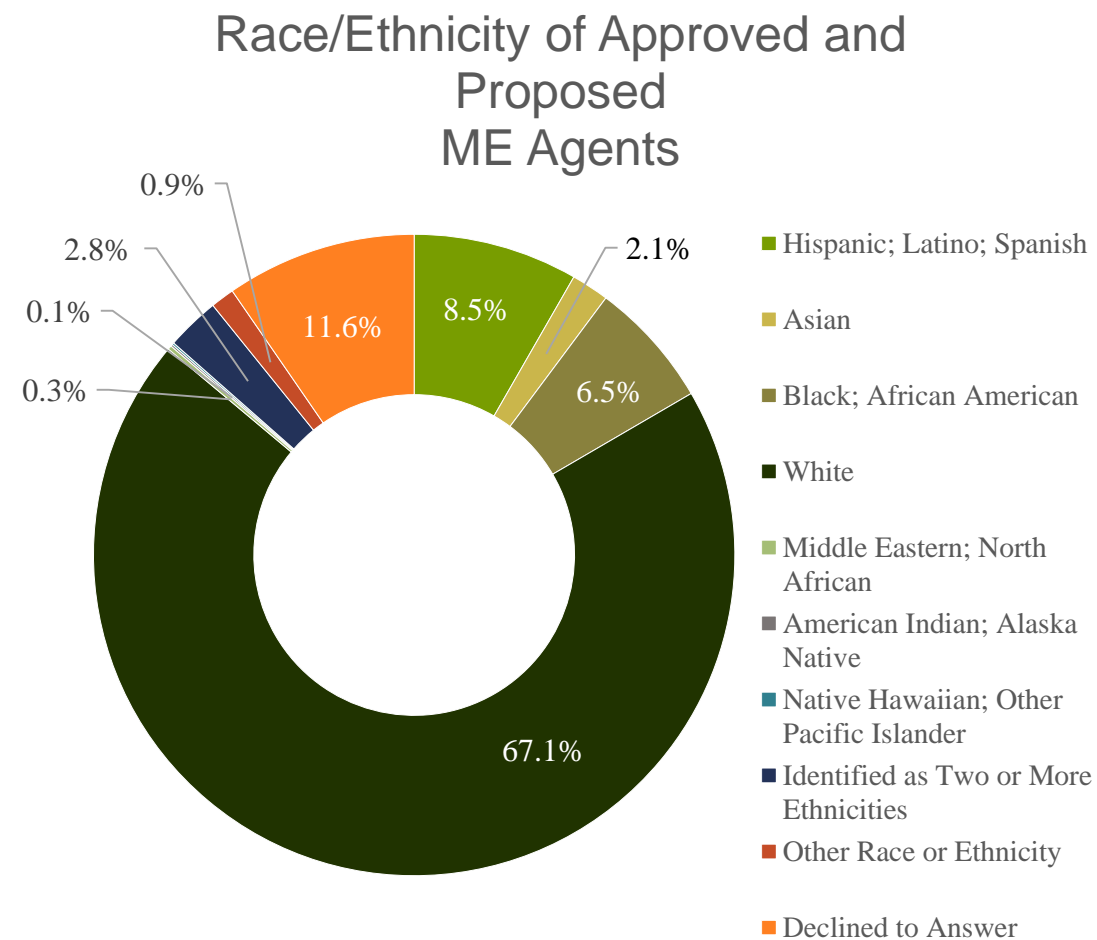
Gender of Approved and Proposed MTC Agents



# Agent Applications | December 14, 2023

*Demographics of Approved and Pending Marijuana Establishment Agents*

Race/Ethnicity	#	%
Hispanic; Latino; Spanish	1,928	8.5%
Asian	471	2.1%
Black; African American	1,477	6.5%
White	15,180	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	641	2.8%
Other Race or Ethnicity	211	0.9%
Declined to Answer	2,621	11.6%
<b>Total</b>	<b>22,635</b>	<b>100.0%</b>

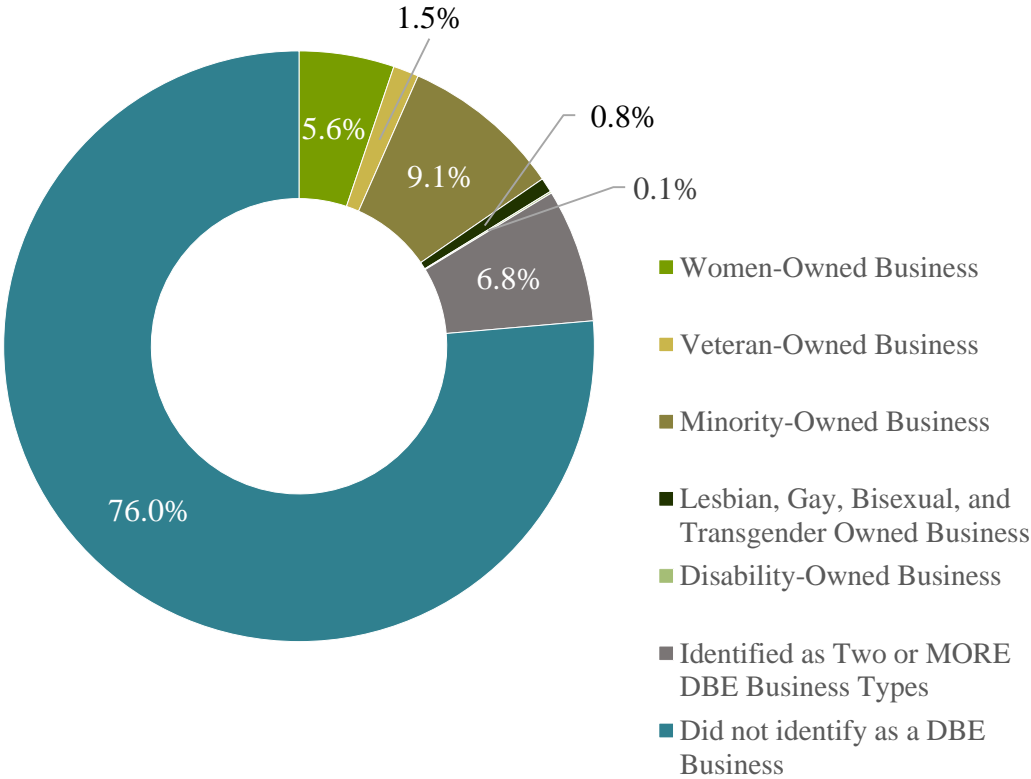


# Licensing Applications | December 14, 2023

*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	140	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	6.8%
Did not identify as a DBE Business	1,165	76.0%
<b>Total</b>	<b>1,533</b>	<b>100.0%</b>

DBE Statistics Approved Licensees

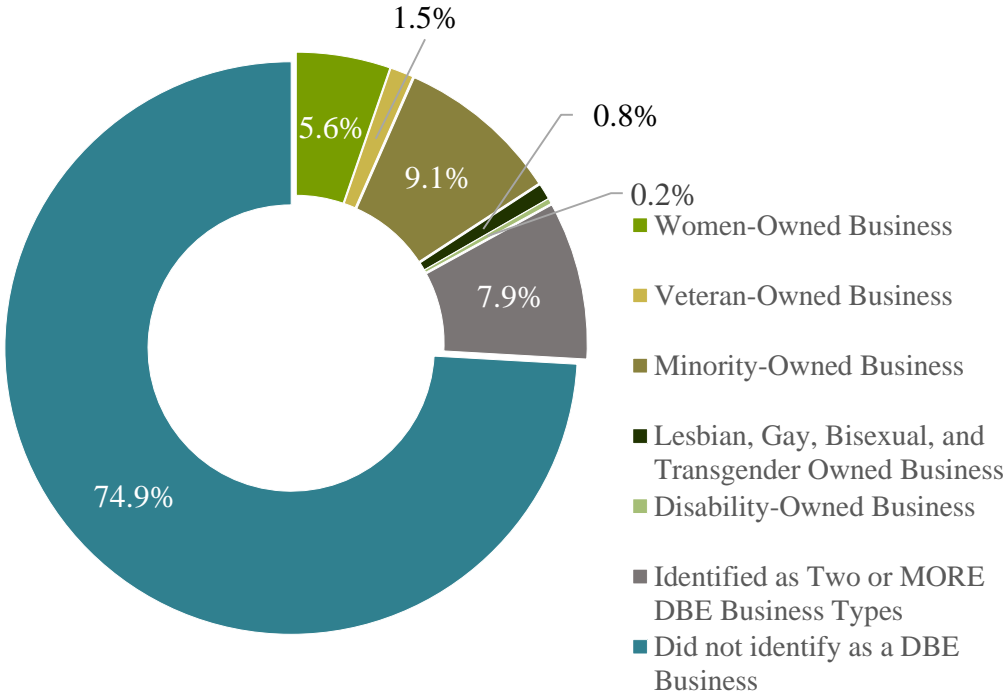


# Licensing Applications | December 14, 2023

*Disadvantaged Business Enterprise (DBE) Statistics for Pending and Approved License Applications*

Type	#	% of Group
Women-Owned Business	98	5.6%
Veteran-Owned Business	26	1.5%
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	138	7.9%
Did not identify as a DBE Business	1,305	74.9%
<b>Total</b>	<b>1,743</b>	<b>100.0%</b>

DBE Statistics for Pending & Approved License Applications



# Adult Use Agent Applications | December 14, 2023

## 68,393 Total Agent Applications:

- 143 Total Pending
  - 130 Pending Establishment Agents
  - 13 Pending Laboratory Agents
- 3,262 Withdrawn
- 2,583 Incomplete
- 4,572 Expired
- 35,334 Surrendered
- 6 Denied / 1 Revoked
- **22,492 Active**

## Of the 143 Total Pending:

- 3 not yet reviewed
- 130 CCC requested more information
- 10 awaiting third party response
- 0 review complete; awaiting approval



# Medical Use Agent Applications | December 14, 2023

*The total number of MTC agent applications received by status.*

MTC Agent Application	#
Pending MTC Agent Applications	6
Pending Laboratory Agent Applications	0
Incomplete	39
Revoked	13
Denied	31
Surrendered	17,558
Expired	2,782
Active	7,499
<b>Total</b>	<b>27,928</b>

